FINAL ENVIRONMENTAL IMPACT REPORT

(RESPONSE TO COMMENTS)

FOR THE

TRACY COSTCO DEPOT ANNEX PROJECT

(SCH # 2020080531)

SEPTEMBER 2024

Prepared for:

City of Tracy
Planning Division
333 Civic Center Plaza
Tracy, CA 95376

Prepared by:

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 580-9818

De Novo Planning Group

A Land Use Planning, Design, and Environmental Firm

RESPONSE TO COMMENTS

FOR THE

TRACY COSTCO DEPOT ANNEX PROJECT
(SCH # 2020080531)

SEPTEMBER 2024

Prepared for:

City of Tracy
Planning Division
333 Civic Center Plaza
Tracy, CA 95376

Prepared by:

De Novo Planning Group
1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 580-9818

RESPONSE TO COMMENTS

Chapter — Page Number

Executive Summary ES-1

1.0 Introduction 1.0-1

1.1 CEQA Requirements for Responses to Comments 1.0-1

1.2 Environmental Review Process 1.0-2

1.3 Organization of the Response to Comments 1.0-4

2.0 Comments on DEIR & RDEIR and Responses 2.0-1

2.1 Introduction 2.0-1

2.2 List of Commenters 2.0-1

2.3 Comments and Responses 2.0-1

3.0 Revisions 3.0-1

3.1 Revisions to the Draft EIR 3.0-1

Tables — Page Number

Table 2.0-1: List of Commenters on Draft EIR and Recirculated Draft EIR 2.0-1

Appendices

Appendix A: Costco Facilities Project Plans

Appendix B: 2017 Kittelson Transportation Impact Analysis

Appendix C: Earthwork Quantity

Appendix D: Chapter 1.0, Introduction

This page left intentionally blank.

INTRODUCTION

The City of Tracy (City) determined that a project-level environmental impact report (EIR) was required for the proposed Tracy Costco Depot Annex (Specific Plan) pursuant to the requirements of the California Environmental Quality Act (CEQA).

The project-level analysis considers the broad environmental effects of the proposed Project.

This EIR has been prepared as a Project-level EIR, described in State CEQA Guidelines § 15161 as: "The most common type of EIR (which) examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation. The project-level analysis considers the broad environmental effects of the proposed Project.

PROJECT DESCRIPTION

The following provides a brief summary and overview of the Project. Chapter 2.0 of the Recirculated Draft EIR includes a detailed description of the Project, including maps and graphics. The reader is referred to Chapter 2.0 for a more complete and thorough description of the components of the Project.

The Project site includes two distinct planning boundaries defined below. The following terms are used throughout this Draft EIR to describe the planning boundaries within the Project site:

- **Project Site** (or **Annexation Area**) – totals 104.46 acres and includes the whole of the Project, including the proposed 103.0-acre Development Area, and 1.46 acres of land along the Delta Mendota Canal (which would not be developed as part of the proposed Project).
- **Development Area** – includes a 103.0-acre parcel (Assessor's Parcel Number [APN] 209-230-02) that is intended for the development of up to 1,736,724 square feet (sf) of industrial uses.

The Project would include the construction and subsequent operation of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a Direct Delivery Center (DDC). The two buildings (approximately 543,526 sf for Building 1 and 1,193,198 sf for Building 2) total approximately 1,736,724 sf on the Project site. The smaller Building 1 is anticipated to serve as the annex by providing additional storage for high-turnover merchandise processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a DDC, an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery through Market Delivery Operations (MDO) located in various smaller cities in the Northern California region. DDC

warehouses distribute ordered goods to the MDOs for delivery (by appointment) to the members. Cold storage would not be provided as part of the proposed Project.[1]

The principal objective of the proposed Project is the approval and subsequent construction and operation of the Costco depot annex and DDC warehouse facility.

The Project site is designated as Agriculture by San Joaquin County's General Plan Land Use Map and is zoned as AG-40 Agriculture by the County. The site is within the City's Sphere of Influence 10-Year Planning Horizon and currently has a City General Plan land use designation of Industrial (I). The San Joaquin County Local Agency Formation Commission (LAFCO) will require the Project site to be pre-zoned by the City of Tracy in conjunction with the proposed annexation. The City's pre-zoning will include the Light Industrial (M-1) zoning designation for the Project site. Additionally, the proposed Project would result in the annexation of the Annexation Area into the City.

Refer to Chapter 2.0, Project Description, for a more complete description of the details of the proposed project.

ALTERNATIVES TO THE PROJECT

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a reasonable range of alternatives to the project or to the location of the project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the Specific Plan. Three alternatives to the proposed Project were developed based on input from City staff, various outside agencies during the NOP review period, and the technical analysis performed to identify the environmental effects of the proposed Project. The alternatives analyzed in this EIR include the following three alternatives in addition to the proposed Project.

- **No Project (No Build) Alternative**: Under this alternative, development of the Project site would not occur, and the Project site would remain in its current existing condition and not be annexed into the City.
- **Reduced Project Alternative:** Under this alternative, the proposed Project would be developed with the same types of industrial uses as described in the Project Description, but the amount of developed land and industrial square footage would each decrease by 25 percent.
- **Agriculture Protection Alternative:** Under this alternative, the proposed Project would be developed in such a way to protect some of the on-site Important Farmland by reducing the overall footprint of the developed areas to a greater extent than the Reduced Project Alternative.

A comparative analysis of the Project and each of the Project alternatives is provided in Table ES-1 of the EIR. As shown in Table ES-1 of the EIR, the No Project (No Build) Alternative is the

[1] That is, there would be no refrigerated warehouse operations or transport refrigeration units (TRUs) as part of the Project. If the Project is approved, the City would include a condition of approval precluding cold uses for the Project.

environmentally superior alternative. However, as required by CEQA, when the No Project (No Build) Alternative is the environmentally superior alternative, the environmentally superior alternative among the remaining alternatives must be identified. The Reduced Project Alternative would have equal impacts in two areas, slightly less impacts in seven areas, and less impacts in six areas. The Agriculture Protection Alternative would have greater impacts in one area, equal impacts in eight areas, slightly less impacts in one area, and less impacts in four areas. Therefore, the Reduced Project Alternative would be the next environmentally superior alternative. It is noted that the Reduced Project Alternative would not fully meet all of the Project objectives.

COMMENTS RECEIVED

On August 28, 2020, the City published a Notice of Preparation (NOP) for the proposed Project. During the NOP process, several comments were received related to the analysis that should be included in the Draft EIR. These comments are included as Appendix A of the Draft EIR and were considered by the City during its preparation of the Draft EIR.

On September 16, 2022, the City publicly circulated a Draft EIR for the proposed Project, inviting comment from the general public, agencies, organizations, and other interested parties. A Notice of Availability (NOA) was filed with the State Clearinghouse (SCH # 2020080531) and the County Clerk and published in a local newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR addressed environmental impacts associated with the Project that were known to the City and were identified during the NOP process and during preparation of the Draft EIR, including potentially significant impacts associated with aesthetics, agricultural resources, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gases and energy, hazards and hazardous materials, hydrology and water quality, land use, noise, public services, transportation and circulation, utilities, and wildfire. The Draft EIR was available for public review and comment from September 16, 2022 through October 31, 2022. The City received eight (8) comment letters on the Draft EIR from public agencies and other parties. All of these comment letters are identified in Table 2.0-1 of this Response to Comments (RTC) document.

Based on comments received on the Draft EIR, on December 22, 2023, the City modified certain sections of the Draft EIR and published a Recirculated Draft EIR (RDEIR) for the Project, inviting comments on the modified sections of the Draft EIR that comprised the RDEIR. A NOA for the RDEIR was filed with the State Clearinghouse (SCH # 2020080531) and the County Clerk and published in a local newspaper pursuant to the public noticing requirements of CEQA. The RDEIR was available for public review and comment from December 22, 2023 through February 5, 2024. The City received five (5) comment letters on the RDEIR. All of these comment letters are identified in Table 2.0-1 of this Response to Comments (RTC) document.

Pursuant to CEQA requirements, the comments received on the Draft EIR and RDEIR are addressed in this RTC document.

This page left intentionally blank.

This Response to Comments document was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Tracy (City) is the lead agency for the environmental review of the Tracy Costco Depot Annex (Project) and has the principal responsibility for approving the Project. This Response to Comments document responds to comments received on the Draft Environmental Impact Report (Draft EIR) and Recirculated Draft EIR (RDEIR).

1.1 PURPOSE AND INTENDED USES OF THE EIR

CEQA REQUIREMENTS FOR RESPONSES TO COMMENTS

This Response to Comments document for the Project has been prepared in accordance with the State CEQA Guidelines. State CEQA Guidelines Section 15132 requires the following:

- the Draft EIR or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Final EIR consists of the Draft EIR, the RDEIR and this Responses to Comments document.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the Project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

PURPOSE AND USE

The City, as the lead agency, has prepared the Response to Comments document to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from approval, construction, and operation of the Project. Responsible and trustee agencies that may use the EIR are identified in Chapters 1.0 and 2.0 of the RDEIR.

The environmental review process enables interested parties to evaluate the Project in terms of its environmental consequences, to examine and recommend methods to eliminate or reduce potential adverse impacts, and to consider a reasonable range of alternatives to the Project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead

agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all aspects of construction and operation of the Project. The details and operational characteristics of the Project are identified in Chapter 2.0, Project Description, of the RDEIR (December 2023).

1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

NOTICE OF PREPARATION AND INITIAL STUDY

The City of Tracy circulated an Initial Study (IS) and Notice of Preparation (NOP) of an EIR for the proposed Project on August 28, 2020 to the State Clearinghouse, State Responsible Agencies, State Trustee Agencies, and other public agencies, organizations and interested persons. A public scoping meeting was held during the Planning Commission meeting on September 9, 2020 to present the project description to the public and interested agencies, and to receive comments from the public and interested agencies regarding the scope of the environmental analysis to be included in the Draft EIR. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The IS, NOP, and comments received on the NOP by interested parties are presented in Appendix A of the Draft EIR.

NOTICE OF AVAILABILITY AND DRAFT EIR

The City published a public Notice of Availability (NOA) for the Draft EIR on September 16, 2022, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2020080531) and the County Clerk, and was published in a local newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review and comment from September 16, 2022 through October 31, 2022.

The Draft EIR contains a description of the Project, description of the environmental setting, identification of Project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of Project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less-than-significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

NOTICE OF AVAILABILITY AND RECIRCULATED DRAFT EIR

Upon review of certain comments received on the Draft EIR during the Draft EIR public comment period, the City concluded that the air quality and greenhouse gas quantitative analyses should be revised to employ more conservative assumptions concerning the distance that project trucks may

travel. A RDEIR was prepared employing models of emissions that assumed that the average trip length for all project truck trips is 29 miles. This reflects the average truck trip length within the county transportation model. The county model is actually a three-county model covering San Joaquin, Stanislaus and Merced Counties, all of which are within the San Joaquin Valley Air Pollution Control District boundaries. The Sierra Club, in its comments on the Draft EIR, had suggested that the Draft EIR assume average truck trip lengths of 25 miles, so the assumptions within the RDEIR are more conservative than that suggestion. Because the increased truck travel distances resulted in air quality impacts that would be substantially more severe than indicated in the Draft EIR, the City prepared the RDEIR.

In addition, the Project applicant responded to the comments on the Draft EIR (received during the September 16, 2022 through October 31, 2022 comment period) by incorporating into the proposed Project numerous new and additional measures and strategies to reduce emissions and vehicle trips.[1] The RDEIR reflected such Project commitments, as well as other Project refinements (such as construction schedule, etc.).

In accordance with CEQA Guidelines Section 15088.5 (c), if the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that contain significant new information. The RDEIR included the following chapters:

- Chapter 1.0: Introduction
- Chapter 2.0: Project Description
- Section 3.3: Air Quality
- Section 3.7: Greenhouse Gases, Climate Change and Energy
- Chapter 4.0: Other CEQA-Required Topics
- Chapter 5.0: References

Those RDEIR chapters substitute for and supersede those contained in the previously-circulated Draft EIR. Those chapters and sections of the Draft EIR that are not listed above remain operative and effective parts of the overall Final EIR.

Upon completion of the RDEIR, the City of Tracy prepared and publicly circulated the RDEIR for the proposed Project on December 22, 2023, inviting comment from the general public, agencies, organizations, and other interested parties. An NOA was filed with the State Clearinghouse (SCH # 2020080531) and the County Clerk, and was published in a local newspaper pursuant to the public noticing requirements of CEQA. The RDEIR was available for public review and comment from December 22, 2023 through February 5, 2024. Additionally, City's Environmental Sustainability Commission conducted a public meeting on January 25, 2024 and a follow-up special meeting on February 1, 2024. The intent of these Commission meetings were to solicit and provide comments on the RDEIR. The comments from the Commission are included in this Response to Comments (see Chapter 2.0).

[1] See letter from Christine Lasley, Costco, to Victoria Lombardo, City of Tracy, November 28, 2023.

During the 2022 Draft EIR comment period, the City received eight comment letters regarding the Draft EIR from public agencies and other parties. During the 2023/2024 RDEIR comment period, the City received five comment letters regarding the RDEIR from private companies and other parties. All of these comment letters are identified in Table 2.0-1 of this Response to Comments document. In accordance with CEQA Guidelines Section 15088, this Response to Comments document responds to the written comments received on the Draft EIR, as required by CEQA. All comments received during the Draft EIR and RDEIR review processes are addressed within this Response to Comments document.

As indicated in the RDEIR, as to the chapters of the Draft EIR that were superseded by replacement chapters within the Recirculated Draft EIR, the City is under no obligation to respond to comments received on the Draft EIR pertaining to those chapters. However, in the interest of full disclosure and robust public review and response, though not required by CEQA, the lead agency has opted in this document to prepare a written response to all comments received on the Draft EIR, including those directed at superseded chapters. To be meaningful, the responses to such comments are framed so as to respond to the issues presented in the subject comments within the Final EIR as a whole, including the data in the later-published, superseding RDEIR chapters.

This Response to Comments document also contains minor edits to the RDEIR, which are included in Chapter 3.0, Revisions. This document, as well as the RDEIR as amended herein, constitute the Final EIR.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The Tracy Planning Commission and City Council will review and consider the Final EIR. If the City Council finds that the Final EIR is "adequate and complete," the Council may certify the Final EIR in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

1) The EIR shows a good faith effort at full disclosure of environmental information; and

2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project which intelligently take account of environmental consequences.

Upon review and consideration of the certified Final EIR, the City Council may take action to approve, revise, or reject the Project. A decision to approve the Project, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. A Mitigation Monitoring and Reporting Program, as described below, would also be adopted in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097 for mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment. This Mitigation Monitoring and Reporting Program has been designed to ensure that these measures are carried out during Project implementation, in a manner that is consistent with the EIR.

1.3 ORGANIZATION OF THE RESPONSE TO COMMENTS

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

CHAPTER 1.0 – INTRODUCTION

Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Response to Comments document.

CHAPTER 2.0 – COMMENTS ON DEIR & RDEIR AND RESPONSES

Chapter 2.0 provides a list of commenters, copies of written and electronic comments made on the Draft EIR (coded for reference), RDEIR, and responses to those written comments.

CHAPTER 3.0 – REVISIONS

Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments received on the Draft EIR.

This page left intentionally blank.

2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR or the RDEIR for the Project, were raised during the respective comment periods. Responses to comments received during the respective comment periods do not involve any new significant impacts or add "significant new information" that would require recirculation of the RDEIR or further recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.*

Sections 2.0 and 3.0 of this RTC document include information that has been added to the EIR since the close of the public review period in the form of responses to comments and revisions.

2.2 LIST OF COMMENTORS

Table 2.0-1 lists the comments on the Draft EIR that were submitted to the City during the 45-day public review period for the Draft EIR (2022). Additionally, the table includes one late comment letter received after the 45-day (2022) review period ended. Further, the table includes the comments on the RDEIR that were submitted to the City during the 45-day (2023/2024) review period for the RDEIR. The assigned comment letter or number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed. Letters received are coded with letters (A, B, etc.).

TABLE 2.0-1 LIST OF COMMENTORS ON DRAFT EIR AND RECIRCULATED DRAFT EIR

RESPONSE LETTER	*INDIVIDUAL OR SIGNATORY*	*AFFILIATION*	*DATE*
A	Gary Ho	Blum, Collins & Ho LLP	10-31-22
B	Tom Dumas	California Department of Transportation	10-31-22
C	Peter Minkel	Central Valley Regional Water Quality Control Board	10-20-22
D	John Tocchini	Resident of Tracy	10-21-22
E	Stephen Velyvis	Project Applicant – Costco Wholesale (Burke, Williams, and Sorensen LLP)	10-31-22
F	Laurel Boyd	San Joaquin Council of Governments	9-22-22
G	Winter King	Shute Mihaly & Weinberger LLP	10-31-22
H	Brian Clements	San Joaquin Valley Air Pollution Control District	11-1-22
I	Gary Ho	Blum, Collins & Ho LLP	2-5-24
J	Jose Antonio Lopez	Chevron	1-8-24
K	N/A	City of Tracy Environmental Sustainability Commission	2-5-24
L	Winter King	Shute, Mihaly & Weinberger LLP	2-5-24
M	Tamara Bartlett	Resident	1-10-24

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DEIR AND RDEIR

CEQA Guidelines Sections 15088 and 15088.5 require that lead agencies evaluate and respond to all comments on the Draft EIR and RDEIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. The written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commentor, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204(a)).

CEQA Guidelines Section 15204 recommends that commentors provide detailed comments that focus on the sufficiency of the EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commentors provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064(f), an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Sections 15088 and 15088.5 also recommend that revisions to the Draft EIR and RDEIR be noted either as revisions in the Draft EIR/RDEIR or as a separate section of the Final EIR. Chapter 3.0 of this RTC document identifies all revisions to the Tracy Costco Depot Annex Draft EIR and RDEIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR and RDEIR are reproduced on the following pages, along with responses to those comments. During the 2022 Draft EIR comment period, the City received eight comment letters regarding the Draft EIR from public agencies and other parties. During the 2023/2024 RDEIR comment period, the City received five comment letters regarding the RDEIR from private companies and other parties. All of these comment letters are identified in Table 2.0-1. In accordance with CEQA Guidelines Sections 15088 and 15088.5, this RTC document responds to the written comments received on the Draft EIR and the RDEIR, as required by CEQA. All comments received during the Draft EIR and RDEIR review processes are addressed within this RTC document, even though the chapters of the Draft EIR that were recirculated in the RDEIR were superseded by the new RDEIR chapters.

This RTC document also contains minor edits to the RDEIR, which are included in Chapter 3.0, Revisions. This RTC document, the Draft EIR, and the RDEIR constitute the Final EIR.

To assist in referencing comments and responses, the following coding system is used:

- Each letter is lettered (i.e., Letter A) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

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

October 31, 2022

VIA EMAIL

Genevieve Federighi, Associate Planner
City of Tracy Development Services
333 Civic Center Plaza
Tracy, CA 95376
Genevieve.Federighi@cityoftracy.org

SUBJECT: COMMENTS ON COSTCO DEPOT ANNEX EIR (SCH NO. 2020080531)

Dear Ms. Federighi:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Costco Depot Annex Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. A-1

1.0 Summary

The project proposes the construction and operation of of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a Direct Delivery Center. The two buildings (approximately 543,326 sf for Building 1 and 1,201,726 sf for Building 2) total approximately 1,745,052 sf on the Project site. The smaller Building 1 is anticipated to serve as the annex by providing additional storage for high-turnover merchandise processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a Direct Delivery Center (DDC), an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery through Market Delivery Operations (MDO) located in various smaller cities in the Northern California region. DDC warehouses distribute ordered goods to the MDOs for delivery (by appointment) to the members. A-2

The Project site is designated as Agriculture by San Joaquin County's General Plan Land Use Map and is zoned as AG-40 Agriculture by the County. The site currently has a City General Plan land use designation of Industrial (I). The San Joaquin County Local Agency Formation Commission (LAFCO) will require the Project site to be pre-zoned by the City of Tracy in conjunction with the proposed annexation. The City's pre-zoning will include the Light Industrial (M-1) zoning designation for Project site. Additionally, the proposed Project would result in the annexation of the Annexation Area into the City of Tracy.

A-2 cont'd

2.0 Project Description

The EIR does not include a floor plan, grading plan, elevations, or detailed site plan for the proposed project. The basic components of a Planning Application include a detailed site plan, floor plan, grading plan, elevations, and written narrative. The site plan provided in Figure 2.0-4 has been edited to remove pertinent information from public review during the CEQA process. Figure 2.0-4 does not provide any detailed information such as the earthwork quantity notes, site coverage, floor area ratio, etc. All of these items are standard information that are depicted on a site plan by an Architect or designer. The edited version of the site plan inserted for public review is meaningless and provides no useful information.

A-3

The EIR has excluded this information and all required application items from public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as these documents contribute directly to analysis of the problem at hand. Providing a grading plan is vital as the EIR utilizes uncertain language in stating that "The *estimated* cut and fill amounts for the Project are 259,000 cubic yards (cy) cut and 253,000 cy fill (for a total export [cut] of 6,000 cy of material)," and there is no method for the public to verify this information. The EIR must be revised to include a wholly accurate and unedited full set of plans, including a complete grading plan to determine the amount of soils/materials to be imported/exported from the site. These grading truck hauling trips must be included for analysis in all portions of environmental analysis, including Air Quality, Energy, Greenhouse Gas Emissions, Noise, and Transportation.

2.1 Effects Found Not to be Significant - Population and Housing

The NOP/IS analysis regarding Population and Housing is inaccurate and does not provide meaningful evidence to support its conclusions. The NOP/IS states that "the project site is located in the City of Tracy SOI and has a City land use designation of Industrial; therefore, the employment growth associated with the proposed project was considered as part of the City's General Plan and associated EIR process" and that "the project does not exceed the employment

A-4

growth estimates for the site under the City's Industrial land use designation." However, the EIR does not provide any meaningful evidence, including calculation of the project's employment generation, to support these claims.

Further, Table 2-7: Development Anticipated Within Years 1-10 and Within Years 11-30 of the City's 2019 Municipal Services Review[1] (MSR) states that Planning Subarea 1 (which encompasses the proposed project site) will generate 480 jobs during years 1-10 and 184 jobs during years 11-30. The 10-Year Horizon of the MSR spans from 2019 to 2029 and the 30-Year Horizon addresses 2029 to 2049. The Project Description states that all phases of the project will be constructed within two years of permit issuance. The Project Goals include "Create approximately 150 to 250 full time jobs," which is 52% of the employment growth anticipated and planned during the 10-Year Horizon. Further, the project will generate 1,745 employees utilizing the General Plan EIR's calculation of 1 employee per 1,000 square feet of industrial space. This is more than 2.5 times the 30-Year Horizon of 664 jobs. This information is not discussed or presented for analysis in the EIR and must be included as part of a revised and recirculated EIR for public review. A finding of significance must be made as the employment growth generated by the proposed project exceeds the growth capacity of the 2019 Municipal Services Review. A-4 cont'd

SJCOG's Population, Household, and Employment Projections[2] notes that the City will add approximately 6,102 jobs between 2020 - 2045. Utilizing the General Plan EIR methodology calculation of 1,745 employees, the project represents 28.5% of the City's employment growth from 2020 - 2045. SJCOG's Growth Forecast notes that the City's population will increase by 42,744 residents between 2020 - 2045. Utilizing Appendix J's calculation of 3,354 employees, the project represents 4% of the City's population growth from 2020 - 2045. A single project accounting for this amount of the projected employment and/or population over 29 years represents a significant amount of growth. Further, the October 2022 industrial development pipeline's[3] 10,886 employees represents 180% of the City's employment growth and 25% of the City's population growth from 2020 - 2045. The proposed project in combination with the current industrial development pipeline (the October 2022 report may not include all applicable projects, such as those with finished construction) vastly exceeds the projected employment growth and is a significant portion of its population growth. The EIR must be revised to include this analysis and also provide a cumulative analysis of projects approved since 2020 and projects "in the

[1] City of Tracy 2019 Municipal Services Review https://www.sjgov.org/docs/default-source/local-agency-formation-commission-documents/municipal-services-and-spheres-of-influence/cities/tracy---july-2019.pdf?sfvrsn=aa988a63_2

[2] SJCOG's 2018 RTP/SCS Appendix R- Population, Household, and Employment Projections https://www.sjcog.org/DocumentCenter/View/3722/Final-2018-RTPSCS-Technical-Appendix-R---Population-Household-and-Employment-Projections?bidId=

[3] Tracy October 2022 Industrial Development Report https://www.cityoftracy.org/home/showpublisheddocument/14087/638016799846970000

pipeline" to provide an adequate and accurate analysis to determine if the project will exceed SJCOG's employment and population growth forecasts for the City. A-4 cont'd

3.3 Air Quality, 3.6 Energy, and 3.8 Greenhouse Gas Emissions

This letter attaches a comprehensive air quality analysis by SWAPE.

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0, CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6077005207) ranks worse than 53% of the rest of the state overall in pollution burden. The surrounding community, including Kimball High School and residences to the east, and adjacent SB 535 Census Tract 6077005206 (north), bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for groundwater threats. People who live near contaminated groundwater may be exposed to chemicals moving from the soil into the air inside their homes[4]. The census tract ranks in the 88th percentile for hazardous waste impacts. Contamination of air, water and soil near hazardous waste generators and facilities can harm the environment as well as people[5]. The census tract also ranks in the 53rd percentile for contaminated drinking water impacts. Poor communities and people in rural areas are exposed to contaminants in their drinking water more often than people in other parts of the state[6]. A-5

The project census tract also ranks in the 61st percentile for ozone burden and the 70th percentile for traffic related impacts, which are attributed to heavy vehicular activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[7]. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births[8].

Further, the census tract is a diverse community including 33% Asian-American, 4% African-American, and 27% Hispanic residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 60% of the census tract over age 25 has not attained a high school diploma, which is an indication that they

[4] OEHHA Groundwater Threats https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats
[5] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[6] OEHHA Contaminated Drinking Water https://oehha.ca.gov/calenviroscreen/drinking-water
[7] OEHHA Air Quality: Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[8] OEHHA Traffic Impacts https://oehha.ca.gov/calenviroscreen/indicator/traffic-density

may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 59th percentile for incidence of cardiovascular disease and 58th percentile for incidence of low birth weights.

California's Building Energy Code Compliance Software (CBECC) is the State's only approved energy compliance modeling software for non-residential buildings in compliance with Title 24[9]. CalEEMod is not listed as an approved software. The CalEEMod-based modeling used in the Energy Calculations (Appendix B.2 within Appendix B) does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using the approved software (CBECC) must be circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not the approved software. A-5 cont'd

It must also be noted that the City and/or SJCOG are not listed as a jurisdictions with local energy standards approved by the CA Energy Commission[10]. According to the CA Energy Commission, "Local jurisdictions are required to apply to the Energy Commission for approval, documenting the supporting analysis for how the local government has determined that their proposed Standards will save more energy than the current statewide Standards and the basis of the local government's determination that the local standards are cost-effective." Therefore, compliance with the City's General Plan, Sustainability Action Plan, and/or SJCOG's 2018 RTP/SCS does not comply with CA Energy Commission standards or AB 32/SB 32. The EIR is misleading to the public and decision makers by stating compliance with these standards when the local jurisdiction standards have not been approved by the CA Energy Commission. A revised EIR must be prepared with adequate analysis of project impacts utilizing an approved modeling software in order to be a reliable informational document in compliance with CEQA.

The EIR analyzes the potentially significant impacts from Greenhouse Gas Emissions in a qualitative manner pursuant to CEQA Guidelines Section 15064.4. However, the consistency analysis provided is erroneous and does not demonstrate a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from the project and its significance. Table 3.7-4: Consistency With A-6

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

[10] Local Ordinances Exceeding the 2019 CA Energy Code https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-3

SJCOG's 2018 RTP/SCS[1] only provides analysis with the eight policies within the document and none of the associated implementation strategies. Further, the analysis provided in Table 3.7-4 does not accurately describe the proposed project and its significant impacts, which is erroneous misleading to the public and decision makers. For example, the EIR concludes the project is consistent with Policy 8: Improve the Quality of Life for Residents because the project is not "sited in an area that would be highly sensitive to the physical environmental impacts associated with the proposed Project, thereby maintaining quality of life for residents in the City of Tracy and the region." However, the EIR concludes that the project will have significant and unavoidable cumulatively considerable environmental impacts to Aesthetics, Agricultural Resources, Air Quality, Noise, and Transportation (VMT), which will degrade the environment and worsen quality of life for residents in Tracy and the region. The project's 12,272 MTCO2e annual emissions is underestimated in the project EIR due to inaccurate modeling, does not further the State's goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050, and obstructs the State from attaining these goals. This is also not consistent with the following Policies and Strategies of the 2018 RTP/SCS: A-6 cont'd

1. Policy 1: Enhance the Environment for Existing and Future Generations and Conserve Energy
2. Strategy 1: Encourage efficient development patterns that maintain agricultural viability and natural resources
3. Strategy 3: Improve air quality by reducing transportation-related emissions
4. Policy 2: Maximize Mobility and Accessibility
5. Strategy 4: Improve regional transportation system efficiency
6. Policy 3: Increase Safety and Security
7. Strategy 9: Facilitate projects that reduce the number of and severity of traffic incidents
8. Policy 4: Preserve the Efficiency of the Existing Transportation System
9. Strategy 12: Optimize existing transportation system capacity through available and/or innovative strategies
10. Strategy 13: Support the continued maintenance and preservation of the existing transportation system
11. Policy 8: Improve the Quality of Life for Residents
12. Strategy 26: Improve the connection between land use and transportation
13. Strategy 27: Enhance public health through active transportation projects

Further, due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, the proposed project has not been adequately analyzed to fully disclose the extent of potentially significant environmental impacts. For example, the Project Description in the Initial Study stated that "the warehouses may include cold storage for Costco's A-7

[1] SJCOG 2018 RTP/SCS https://www.sjcog.org/DocumentCenter/View/4156/Final-Compiled-RTPSCS-2018

meat processing plant in Tracy, as well as food processing and canning," but this statement was removed from the EIR Project Description and 0 square feet of the proposed project were modeled in the CalEEMod output sheets as refrigerated warehousing. Nonetheless, the Air Quality section states that "Truck Refrigeration Units (TRUs) are expected to be in use on approximately 15% of the heavy-duty trucks that travel to and from the Project site for building 2 (the warehouse for high turnover merchandise sold at warehouse stores and as a pallet repair and a Return to Vendor (RTV) facility), and no trucks for building 1 (the regional ecommerce fulfillment distribution center primarily for large and bulky items)." If 15% of the the heavy-duty trucks at Building 2 have Truck Refrigeration Units, they must also have refrigerated space inside the building for the merchandise on the trucks. The EIR revised to include accurate modeling in accordance with project operations and a consistency analysis with all policies/strategies of the RTP/SCS.

A-7 cont'd

3.10 Land Use and Planning

The EIR does not provide a consistency analysis with any General Plan goals, policies, and objectives that the project has significant potential to conflict with due to errors in modeling, modeling without supporting evidence, and the EIR's determination that the project will have significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, Noise, and Transportation (VMT), including but not limited to:

1. Objective LU-8.1 Policy 3 The City shall support existing San Joaquin County agricultural land use designations in the Planning Area and strongly oppose changes that result in increased urbanization.
2. Goal AQ1 Improved air quality and reduced greenhouse gas emissions.
3. Goal LU-9 Leadership in environmental, economic and social sustainability.
4. Objective LU-9.1 Undertake measures to reduce greenhouse gas emissions and improve the sustainability of actions by City government, residents and businesses in Tracy.
5. Objective AQ-1.1 Improve air quality and reduce greenhouse gas emissions through land use planning decisions.
6. AQ-1.1 Policy 1. The City shall promote land use patterns that reduce the number and length of motor vehicle trips.
7. AQ-1.1 Policy 2. To the extent feasible, the City shall maintain a balance and match between jobs and housing.
8. AQ-1.1 Policy 4. Employment areas should include a mix of support services to minimize the number of trips.
9. Objective AQ-1.2 Promote development that minimizes air pollutant and greenhouse gas emissions and their impact on sensitive receptors as a result of indirect and stationary sources.
10. AQ-1.2 Policy 2. The City shall assess through the CEQA process any air quality impacts of development projects that may be insignificant by themselves, but cumulatively significant.
11. AQ-1.2 Policy 3. Developers shall implement best management practices to reduce air pollutant emissions associated with the construction and operation of development projects.
12. AQ-1.2 Policy 6. Installation of solar voltaic panels on new homes and businesses shall be encouraged.

A-8

13. AQ-1.2 Policy 12. New sources of toxic air pollutants shall prepare a Health Risk Assessment as required under the Air Toxics "Hot Spots" Act and, based on the results of the Assessment, establish appropriate land use buffer zones around those areas posing substantial health risks.
14. AQ-1.2 Policy 13. Dust control measures consistent with San Joaquin Valley Air Pollution Control District rules shall be required as a condition of approval for subdivision maps, site plans, and all grading permits.
15. AQ-1.2 Policy 14. Developments that significantly impact air quality shall only be approved if all feasible mitigation measures to avoid, minimize or offset the impact are implemented.
16. AQ-1.2 Policy 15. Encourage businesses to electrify loading docks or implement idling-reduction systems so that trucks transporting refrigerated goods can continue to power cab cooling elements during loading, layovers, and rest periods.
17. Objective AQ-1.4 Support local and regional air quality improvement efforts.
18. Goal CIR-1 A roadway system that provides access and mobility for all of Tracy's residents and businesses while maintaining the quality of life in the community
19. Objective CIR-1.3 Adopt and enforce LOS standards that provide a high level of mobility and accessibility, for all modes, for residents and workers.
20. CIR-1 Policy 1. To the extent feasible, the City shall strive for LOS D on all streets and intersections, with the LOS standard for each facility to be defined in the Transportation Master Plan in accordance with the opportunities and constraints identified through the traffic projections and analysis performed for that Plan.
21. CIR-1 Policy 10. Exclusive right turn lanes in and out of major residential, commercial, industrial and office developments shall not reduce the width of public or private landscaping requirements.

A-8 cont'd

Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, and the project's significant and unavoidable cumulatively considerable Aesthetics, Agricultural Resources, Air Quality, Noise, and Transportation (VMT) impacts, the proposed project is directly inconsistent with the goals, policies and objectives listed above adopted with the purpose of avoiding or mitigating an environmental effect. The EIR must be revised to include a consistency analysis with all General Plan goals, policies and objectives in order to provide an adequate and accurate environmental analysis.

This is especially vital as Appendix F: Traffic Analysis concludes that the following intersections will operate at unacceptable levels of service:

1. Intersection #6 – Hansen Rd & Old Schulte Rd (PM Peak Hour)
2. Intersection #10 – Pavilion Pkwy & Old Schulte Rd (PM Peak Hour)
3. Intersection #13 - Lammers Rd & Valpico Rd (PM Peak Hour)

The EIR must be revised to analyze the project and its significant and unavoidable impacts in accordance with any and all General Plan goals, policies, and objectives in order to provide an adequate and accurate environmental analysis.

Additionally, the EIR notes that the City of Tracy last prepared a Municipal Services Review (MSR) for the San Joaquin LAFCo in 2019." However, the MSR is not included for public review.

A-9

CEQA § 15150 (f) states that incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The MSR contributes directly to the analysis of the problem at hand. Not including the MSR as an attachment for public review is in violation of CEQA § 15150 (f). The EIR must be revised and recirculated for public review including the MSR as an attachment. This is especially vital because the project's employment growth will exceed the MSR 10-Year horizon growth forecast as discussed above in the Population and Housing analysis.

A-9 cont'd

3.13 Transportation and Circulation

The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or the project's potential to result in inadequate emergency access. The EIR has not provided any exhibits depicting the available truck/trailer turning radius at the intersection of the project driveways to determine if there is enough space available to accommodate heavy truck maneuvering. Further, there are no exhibits providing on-site analysis regarding available space to accommodate heavy truck maneuvering. Notably, Figure 25: STAA Truck Turning Template and the professional consultant conclusions within Appendix F state that:

1. STAA trucks are unable to perform northbound right turn at Driveway #1. Design modifications to the proposed curb are required to allow STAA trucks to perform necessary movements to access the site.
2. STAA trucks are unable to perform eastbound and northbound right turns at Driveway #3. Design modifications to the proposed curb are required to allow STAA trucks to perform necessary movements to access the site.
3. A westbound left turn must be provided at Driveway #3 and it must accommodate a STAA truck turning template.

A-10

Further, there is no exhibit depicting emergency access to the project site and Figure 2.0-4 Site Plan does not depict any of these required improvements. Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared for the proposed project with a finding of significance due to these impacts.

Further, Table 6: Trip Generation within Appendix F states that "Trip generation is provided by Kittleson's Tracy Costco Depot Transportation Impact Analysis Report (August 28, 2017)." However, the 2017 Kittleson Tracy Costco Depot Transportation Impact Analysis Report is not included for public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)).

Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the 2017 Kittleson Transportation Analysis contributes directly to analysis of the problem at hand. A revised EIR must be prepared to include the 2017 Kittleson Transportation Analysis. Notably, any analysis completed for the proposed project in 2017 as part of a separate development project is project piecemealing in violation of CEQA. CEQA Guidelines Section 15378 requires that environmental documents analyze "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." Piecemealing a known and planned construction project into separate, smaller development projects or development areas presents unduly low environmental impacts.

A-10 cont'd

4.0 Other CEQA Considerations

CEQA Guidelines Section 15126 requires that "all phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation. The subjects listed below shall be discussed as directed in Sections 15126.2, 15126.4 and 15126.6, preferably in separate sections or paragraphs of the EIR. If they are not discussed separately, the EIR shall include a table showing where each of the subjects is discussed.

A) Significant Environmental Effects of the Proposed Project.
B) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented.
C) Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented.
D) Growth-Inducing Impact of the Proposed Project.
E) The Mitigation Measures Proposed to Minimize the Significant Effects.
F) Alternatives to the Proposed Project.

A-11

The EIR has not provided discussion and analysis regarding required topics (c) and (d). The EIR must be revised in order to provide this analysis as required by CEQA Guidelines Section 15126.

5.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6.) The only alternatives chosen for analysis include the CEQA required "No Project" alternative and only two other alternatives - a Reduced Project Alternative and an Agriculture Protection Alternative. The EIR does not evaluate a reasonable range of alternatives as only two alternatives beyond the required No Project alternative are analyzed. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This could include alternatives such as development of the site with a project that

A-12

reduces all of the proposed project's significant and unavoidable impacts to less than significant levels, or a mixed-use project that provides affordable housing and local-serving commercial uses, which may reduce VMT, GHG emissions, and improve Air Quality.

A-12 cont'd

Conclusion

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

A-13

Sincerely,



Gary Ho
Blum Collins & Ho, LLP

Response to Letter A: Blum, Collins & Ho LLP

Response A-1: The commentor requests to be added to the public interest list regarding this Project. The commentor has been added to the City's public interest list for this Project.

Response A-2: The commentor correctly summarizes the proposed Project. This comment serves as an introduction to the comment letter.

Response A-3: The commentor states that the EIR does not include a floor plan, grading plan, elevations, or detailed site plan. The commentor states that the edited version of the site plan inserted for public review is meaningless and provides no useful information. The commentor further states that the site plan shown in Figure 2.0-4 in Chapter 2.0, Project Description, of the Draft EIR shows the building sizes, building locations, overall site layout, parking areas, bio-retention areas, site access points, parking areas, and other Project details. Additionally, the stormwater quality control plan is included as Appendix I (Stormwater Quality Control Plan) of the Draft EIR. The stormwater quality control plan shows further details regarding the bio-retention areas, as well as typical sections of stormwater treatment planters and drainage area calculations. The preliminary grading and drainage plan is included in Appendix J (Costco Depot Project Planning Submittal Review for Drainage and Flood).

It is also noted that Chapter 2.0, Project Description, of the Recirculated Draft EIR (which superseded the Draft EIR Chapter 2) includes a site plan, preliminary landscape plan, and stormwater quality control plan. See Figures 2.0-4 through 2.0-6 of the Recirculated Draft EIR.

The Project Description satisfies CEQA's requirements for meaningful disclosure. The Draft EIR complies with CEQA Sections 15121, 21003(b), and 15150 (f).

Response A-4: The proposed Project would result in an increase in employment opportunities on the Project site, which is designated by the City's General Plan for industrial use. As noted in the Draft EIR, the proposed project is anticipated to generate between 150 and 250 full-time employees. It would be speculative to identify where these employees currently reside (i.e., whether the employees currently reside in Tracy or would move to Tracy to be employed at the Project site).

The Project would result in 150 to 250 jobs within the City's Planning Subarea 1. The Project would not result in 1,745 employees, as stated in the comment. This amount of jobs (150 to 250) is within the forecast of 664 jobs within 30-years. As noted throughout the Recirculated Draft EIR and Draft EIR, the Project site is within the Tracy Sphere of Influence (SOI) 10-Year Planning Horizon and is immediately adjacent to the Tracy city limits to the north of the site.

It is also noted that Planning Subarea 1 is largely already developed with urban uses. For example, the area west of Mountain House Parkway and east of Interstate 580 within this

Subarea is currently developed and has been developed since prior to the adoption of the City's 2019 MSR. The Project site is one of the few undeveloped parcels within Subarea 1.

Further, the Project site is designated for industrial development by the City's General Plan. As such, employment-generating uses have been assumed for the site by the City since the General Plan was adopted in 2011.

It is also noted that impacts related to population and housing are discussed in the Initial Study, which is included as Appendix A of the Draft EIR. As discussed on page 47 of the Initial Study, " According to the 2018 U.S. Census population estimates, the population in Tracy is 91,812 people. The proposed project would result in the construction of two Costco warehouse and distribution buildings that would generate additional employment opportunities. The additional employees may come from Tracy or surrounding communities. The project would not directly introduce new residents to the City as no housing is proposed as part of the project. It is noted, however, that some portion of the proposed project employees would become Tracy residents."

Response A-5: See comment responses to Comment I-4 and I-5.

It should be noted that specific responses to the SWAPE attachment to this DEIR comment letter are not provided herein, since such comments have been superseded by the SWAPE attachment provided in the Blum, Collin & Ho LP comment letter to the RDEIR. See our responses to the Comment Letter I (specifically, our responses to the SWAPE comment letter to the RDEIR are provided under comment responses I-15 through I-20).

Response A-6: See comment response to comment I-8, below, for a response to this comment (i.e. A-6).

Response A-7: The proposed Project does not include cold storage. This has been updated appropriately within the text of the Recirculated Draft EIR, as well as within the assumptions of the Health Risk Assessment included with the Recirculated Draft EIR.

Response A-8: A General Plan policy consistency analysis has been added to Section 3.10, Land Use, of the Draft EIR. See Chapter 3.0, Revisions, of this Response to Comments document for the additional discussion. In accordance with CEQA dictates, transportation impacts have been evaluated applying vehicle miles traveled (VMT) as the threshold of significance rather than levels of service (LOS) at intersections; thus, whether or not intersections operate at acceptable levels does not affect the EIR's impact conclusions. It is noted that LOS standards may be used by the City to impose conditions of approval to maintain the City's LOS standards.

Response A-9: The latest Municipal Services Review or MSR is available online here: https://www.sjlafco.org/files/c0af4bab6/tracy---july-2019.pdf

Contrary to the commentor's claim, the Draft EIR neither intended nor attempted to formally incorporate the MSR by reference into the Draft EIR but rather, simply listed the MSR together with all of the other background information and source documents in

Chapter 7.0 as permitted under CEQA Guidelines Section 15148. Accordingly, the Draft EIR complies with Public Resources Code Section 21003(b) as well as CEQA Guidelines Sections 15121, 15148, and 15150 (f).

Response A-10: The 2017 Kittleson Tracy Costco Depot Transportation Impact Analysis Report (2017 Report) is included as Appendix B of this Response to Comments document. The 2017 Report was prepared to assess the potential effects of changes to the then existing Costco Depot campus located at 25501 Gateway Blvd, Tracy, CA 95377. In 2017, Costco was considering expanding the then existing depot building and constructing a new e-commerce building on the campus. The e-commerce building would replace an existing Costco e-commerce facility located at that time at 25149 S Schulte Road. The report does not pertain to the Depot Annex but rather provided Costco-specific trip information that was used for the Traffic Study. Since the 2017 Report does not evaluate any component of the Project, revision and recirculation of the Transportation Section of the EIR is not required.

As noted on page 3.13-19 of Section 3.13, Transportation and Circulation, of the Draft EIR, the Project does not propose any new roadways or transportation facilities that would be inconsistent with applicable design standards for the City of Tracy. The Project proposes an increased land use density, which would result in increased travel activity, including vehicle (cars and trucks), bicycle, pedestrian, and potentially transit trips. In order to provide access to and from the Project site, the accesses along West Schulte Road will be designed to serve automobiles, bicyclists, pedestrians, and Surface Transportation Assistance Act (STAA) vehicles. The Project design would also be subject to the City's Engineering Design & Construction Standards, which includes a section for Street Design Standards. These Project-generated trips would be served by existing and planned facilities that are constructed to applicable design standards to serve these travel modes. Therefore, the proposed Project would not result in a change to the vehicle mix or speed of traffic that is not compatible with the design of existing or planned roadways and transportation facilities. Impacts related to increases in hazards due to a geometric design feature or incompatible uses would be less than significant.

Additionally, as discussed on pages 3.13-19 and 3.13-20, implementation of the proposed Project would not create roadway and transportation facilities that impede access for emergency response vehicles. The proposed site accessways, improvements to the West Schulte Road and Bud Lyons Way intersection, and internal transportation network is designed to maintain levels of accessibility for police and fire response times, which ensures vehicles have the necessary access when responding to an emergency. The internal circulation is designed to meet City code for emergency vehicle access and would maintain high levels of emergency vehicle accessibility and mobility, which ensures vehicles have the necessary access when responding to an emergency. Emergency vehicles arriving from West Schulte Road will have unimpeded access to the Project site. Therefore, impacts related to emergency access would be less than significant

Further, as noted on page 3.13-19 of Section 3.13, Transportation and Circulation, of the Draft EIR, in order to provide access to and from the Project site, the accesses along West Schulte Road will be designed to serve automobiles, bicyclists, pedestrians, and STAA vehicles. The Project design would also be subject to the City's Engineering Design & Construction Standards, which includes a section for Street Design Standards. These Project-generated trips would be served by existing and planned facilities that are or would be constructed to applicable design standards to serve these travel modes (including STAA vehicles). It is also noted that, since the Draft EIR was released, the site plan has been revised to address the STAA comments. According to Kimley-Horn, the driveway turn templates were provided and reviewed during the off-site improvement plan check process and all comments related to this topic were addressed.

Response A-11: Impacts associated with significant irreversible environmental changes that would be involved in the proposed action should it be implemented are discussed on pages 4.0-25 and 4.0-26 of Chapter 4.0, Other CEQA-Required Topics, of the Draft EIR. The following shows an excerpt of the discussion:

> CEQA Section 15126.2(c) and Public Resources Code Sections 21100(b)(2) and 21100.1(a), require that the EIR include a discussion of significant irreversible environmental changes which would be involved in the proposed action should it be implemented. Irreversible environmental effects are described as:
>
> - The project would involve a large commitment of nonrenewable resources;
> - The primary and secondary impacts of a project would generally commit future generations to similar uses (e.g., a highway provides access to previously remote area);
> - The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
> - The phasing of the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).
>
> Determining whether the proposed Project would result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed such that there would be little possibility of restoring them. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.
>
> Implementation of the proposed Project would result in the conversion of the approximately 103.0-acre Development Area, which is comprised of vacant land previously used for agricultural purposes and a small portion of land used as an overflow outlet for the Delta-Mendota Canal for the development of industrial uses. Development of the proposed Project would constitute a long-term commitment to these uses. It is unlikely that circumstances would arise that would justify the return of the land to its previous condition as agricultural or vacant rural land.

A variety of resources, including land, energy, water, construction materials, and human resources would be irretrievably committed for the initial construction, infrastructure installation and connection to existing utilities, and its continued maintenance. Construction of the proposed Project would require the commitment of a variety of other non-renewable or slowly renewable natural resources such as lumber and other forest products, sand and gravel, asphalt, petrochemicals, and metals.

Additionally, a variety of resources would be committed to the ongoing operation and life of the proposed Project. The introduction of industrial uses to the Project site will result in an increase in area traffic over existing conditions. Fossil fuels are the principal source of energy and the proposed Project will increase consumption of available supplies, including gasoline and diesel. These energy resource demands relate to initial Project construction, Project operation and site maintenance and the transport of people and goods to and from the Project site.

Section 15126.2(d) of the CEQA Guidelines requires an EIR to "discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth..." In general terms, a project may result in a significant growth inducing impact if it individually or cumulatively with other projects results in any of the actions described in the following examples:

- The project removes an obstacle to growth, such as: the establishment of an essential public service, the provision of new access to an area, or a change in zoning or general plan designation.
- The project results in economic expansion, population growth or the construction of additional housing occurs in the surrounding environment in response to the project, either directly or indirectly.

Chapter 4.0, Other CEQA-Required Topics, of the Recirculated Draft EIR discusses growth-inducing impacts. See pages 4.0-26 and 4.0-27 of the Recirculated Draft EIR. As discussed, existing storm drain, sewer, water, and gas lines/pipes are currently located along West Schulte Road. The Project would be served by existing sewer, water and other utility services that have been established on the Project site and in the Project area. Access to the Project would be provided by existing roads and proposed roadways. The main entry and exit point for employee vehicles would be located at the center of the site, at the existing signalized Bud Lyons Way intersection. A second employee entry would be located east of the Bud Lyons Way intersection and would be right-in and right-out only. The third access driveway located at the Project site's northeast boundary includes a new signalized intersection and a deceleration lane for trucks traveling eastbound on West Schulte Road. Therefore, the proposed Project would not require an extension of public services that have the potential to result in or facilitate unplanned growth in the Project area.

The proposed Project would provide employment opportunities for City and County residents on a site that has been planned for industrial development by the City of Tracy General Plan and associated EIR. Overall, the additional industrial uses in the City would not have the long-term effect of inducing population growth.

The Project would result in an increase in employment opportunities by creating full-time job positions. The Project would also generate short-term construction employment opportunities, but these opportunities would not result in substantial population growth in the project region. Therefore, the proposed Project would not result in significant growth inducing impacts.

Response A-12: As discussed on page 5.0-18 of Chapter 5.0, Alternatives to the Proposed Project, CEQA requires that an environmentally superior alternative be identified among the alternatives that are analyzed in the EIR. If the No Project (No Build) Alternative is the environmentally superior alternative, an EIR must also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). The environmentally superior alternative is that alternative with the least adverse environmental impacts. The Reduced Project Alternative would reduce impacts related to VMT, GHG emissions, and air quality. The alternatives suggested by the commenter would still result in significant and unavoidable impacts related to Prime Farmland. The alternative which would avoid this unavoidable impact to Prime Farmland would be to never develop the site with any uses.

Response A-13: The commentor states that they believe the EIR is flawed and a revised EIR should be prepared. A Recirculated Draft EIR for the Project was completed and circulated for public comment. The commentor has been added to the public interest list for the Project.

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

OFFICE OF THE DISTRICT 10 DIRECTOR
P.O. BOX 2048 | STOCKTON, CA 95201
(209) 948-7943 | FAX (209) 948-7179 TTY 711
www.dot.ca.gov

October 20, 2022

10-SJ-580-PM 12.062
Tracy Costco Depot
SCH#2020080531
DEIR

Genevieve Federighi
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376

Dear Ms. Federighi:

The California Department of Transportation appreciates the opportunity to review the DEIR and Traffic Impact Study (TIS) for the Tracy Costco Depot Annex. The Project would include the construction and subsequent operation of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a Direct Delivery Center. The two buildings total approximately 1,745,052 sf on the Project site. The Project site is located at 16000 West Schulte Road. The Department has the following comments: B-1

1. If the applicant wishes to use STAA trucks at the project site, the applicant will be responsible for making the needed improvements to the highway and acquiring the appropriate STAA Terminal Access approvals.
    a. The Terminal Access Application letter must be submitted to Jaime Quesada of Caltrans District 10 Freeway & Highway Operations. All local agencies involved in the proposed STAA routes must be CC'd when the application letter is submitted.
    b. The application letter must include a map showing all the planned routes for STAA trucks accessing the facility, including local roads and internal circulation. Off-tracking analysis must be submitted for review.
    c. This application should be submitted as early as possible so that Caltrans can evaluate the proposed STAA routes.
    d. Terminal Access application procedures can be found at the following link: https://dot.ca.gov/programs/traffic-operations/legal-truck-access/ta-process

B-2

2. Caltrans recommends the establishment of programs or methods to reduce VMT such as carpooling and appropriate bicycle, pedestrian, and transit infrastructure.
    a. The Department also recommends bus stops near the development to serve employees.
    b. Secure bicycle storage facilities, such as bicycle racks, should also be included.

B-3

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

3. The TIS that was submitted does not use the latest version of the ITE Trip Generation Manual (11th Edition). It is strongly suggested that future studies use the latest version. B-4
4. Table 3.13-1 does not include daily trip generation, which is needed for the VMT analyses. B-5
5. Appendix F (Traffic Analysis) shows 250 employees, which does not match the 400 employees in the IS-NOP document. B-6
6. Appendix F, the information on Tables 1 and 2 are exactly the same as Tables 5 and 6. What is the reason for this redundancy? B-7
7. Please verify that this value of 806.0 is correct in Appendix F-Tables 2 and 6, as is not used in the VMT calculation or referenced anywhere else in the document. B-8
8. In section 3.13 TRANSPORTATION AND CIRCULATION, under VMT Significance Criteria, the statement, "For the surrounding industrial land use area, the City's Draft threshold is 9.4 VMT per employee." This threshold appears to be too low, which indicates an average of 11 VMT per employee for industrial land uses. For this to be the case, practically all such employees would need to come from within Tracy. In reality, at least a portion (even a large portion) of the industrial employees is believed to commute from other communities with cheaper housing costs (e.g., Stockton, Modesto, etc.). Most industrial land uses in Tracy are warehouses/distribution centers, like the Costco Depot project. Therefore, the type of employees should also be similar with similar commute patterns. This calls into suspect the big discrepancy between the threshold and the VMT/employee generated by the project (24.8). B-9
9. The study should include an explanation of how the $633.11 fee/VMT is calculated. B-10
10. A list of the projects in the VMT Banking Fee Program should be provided along with the cost and the amount of VMT that each project can be expected to reduce. B-11
11. It is stated that the project is not required to mitigate the full VMT impact. If this is supported by OPR or any other CEQA document, please provide a citation. The quoted CAPCOA statement only suggests that up to 15% of the VMT can be reasonably expected to be reducible via TDM measures; it does not mean the project is only required to mitigate 15% of the VMT generated above the threshold. B-12
12. The appendix labeling and order are not the same as listed in the table of content in the latest EIR (September 2022). B-13
13. The TIS shown on page 711 out of 1935 in the DEIR is dated December 16, 2021 and contains highlighted missing information that should be filled. However, the TIS shown in Appendix F is dated September 12, 2022 and contains the completed information. Please make sure that the TIS shown in the main body of the DEIR and the TIS shown in the Appendices are consistent. B-14

If you have any questions, please contact me at 209-483-2582 or Nicholas Fung at (209) 986-1552. B-15

Sincerely,

Nicholas Fung
FOR

Tom Dumas
Chief, Office of Metropolitan Planning

Response to Letter B: California Department of Transportation

Response B-1: The commentor summarizes the proposed Project. This comment serves as an introduction to the comment letter.

Response B-2: The Project site is located at 16000 West Schulte Road. West Schulte Road in the vicinity of the Project site is a STAA truck route from the intersection with Mountain House Parkway to 16900 W. Schulte Road, which is west of the Project site. Costco would comply with the Terminal Access application procedures set forth by Caltrans to extend the STAA truck route on West Schulte Road and support STAA truck access to the Project site

Response B-3: As discussed in Impact 3.13-1 in Section 3.13, Transportation and Circulation, of the Draft EIR, the Project would be required to prepare and implement a Transportation Demand Management (TDM) Plan. As part of Mitigation Measure 3.13-1, the proposed Project would be required to monitor and evaluate the effectiveness of the Project's TDM Plan and provide the results to the City of Tracy. Based on the results of the evaluation, modifications to the TDM Plan may be required by the City in order to improve effectiveness toward achieving the home-based work VMT per worker target. A list of TDM measures is included in Table 3.13-2 in Section 3.13 of the Draft EIR.

Mitigation Measure 3.13-1 was revised as part of this Response to Comments document to include eight additional TDM strategies. See Chapter 3.0 of this Response to Comments document for the final mitigation language.

It is also noted that Section 3.3, Air Quality, of the Recirculated Draft EIR includes several mitigation measures that promote bicycle and electric vehicle use. See below:

Mitigation Measure 3.3-18*: The Project applicant shall provide electrical outlets for charging of employee e-bikes.*

Mitigation Measure 3.3-25*: The Project applicant shall ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) shall be electric or zero-emission vehicles. The Project applicant shall provide on-site electrical charging facilities to adequately service such electric vehicles.*

Mitigation Measure 3.3-26*: The Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).*

Mitigation Measure 3.3-29*: The Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.*

Response B-4: The trip generation estimates presented in the Draft EIR are conservative based on the expected activity for this Project. The Draft EIR assumes that the Project buildings could be used for high turnover, high volume merchandise. Costco intends to use the larger of the two Project buildings (Building 2) as a Direct Delivery Center primarily for large and bulky items ordered online by Costco members for direct delivery through smaller Market Delivery Operations facilities located in various smaller cities in the Northern California region. Costco plans to deploy the smaller of the two Project buildings (Building 1) as an annex to the nearby Costco Depot, providing additional storage for merchandise processed through the Depot, a pallet repair facility, and a return-to-vendor facility. Given these planned uses, if Project-specific assumptions were used, the number of trips generated by the Project would be less than that reported in the Draft EIR. The information and data below were developed by Kittelson & Associates, Inc. on behalf of Costco.

- The Draft EIR reports on page 3.13-10, "the proposed Project was calculated using the e-Commerce trip generation rates provided by the Tracy Costco Depot Transportation Impact Analysis Report (Kittelson and Associates, August 28, 2017). These rates were then split into passenger car and truck trips based on ITE guidance for high-cube and warehousing facilities. These rates were compared against the City trip rates and ITE trip rates. The e-commerce rates from Costco are higher than the City and ITE trip rates."

- The e-commerce daily trip rate used in the Draft EIR is 2.17 trips per 1,000 square feet (KSF).

- The daily trip rate for a Costco DDC is 0.38 based on data collected at Costco DDCs in Stockton, CA, Gouldsboro, PA, and Romeoville, IL.

- The daily trip rate for ITE Trip Generation Manual, 10th Edition Land Use Code 150 (Warehousing) is 1.74.

- Trip generation rates for Costco Direct Delivery Centers are lower than the Costco e-commerce trip generation rates documented in the 2017 Tracy Costco Depot Transportation Impact Analysis Report. ITE Land Use Code 150 (Warehousing) trip generation rates are lower than Costco e-commerce trip generation rates. Therefore, the trip generation estimates for the Project are higher and more conservative than would be expected for this Project and the activities anticipated on the site.

- For passenger car trip generation, the transportation analysis assumes 2,576 daily passenger car trips. Using Project-specific data, 950 daily trips would be expected. This represents 1,627 fewer daily trips (a 63% reduction).

- For truck trip generation, the transportation analysis assumes 1,224 daily truck trips. Using Project-specific data, 451 daily truck trips would be expected. This represents 773 fewer daily truck trips (a 63% reduction).

- The combined reductions of expected daily passenger car trips would result in fewer vehicle miles traveled than reported in the Draft EIR. The extent to which the Project would exceed the City's VMT threshold would be lessened commensurate with the reduction in passenger car trips, thereby considerably reducing the Project's transportation impact.

Response B-5: Please see Response B-4. The Draft EIR does employ daily trip rates and reports on page 3.13-10, "the proposed Project was calculated using the e-Commerce trip generation rates provided by the Tracy Costco Depot Transportation Impact Analysis Report (Kittelson and Associates, August 28, 2017). These rates were then split into passenger car and truck trips based on Institute of Transportation Engineers' (ITE) guidance for high-cube and warehousing facilities. These rates were compared against the City trip rates and ITE trip rates. The e-commerce rates from Costco are higher than the City and ITE trip rates."

The e-commerce daily trip rate used in the Draft EIR is 2.17 trips per 1,000 square feet (KSF). Using this trip rate and the total square footage for the Project (approximately 1,736,724 sf), the Project would generate approximately 3,768.7 daily trips.

Response B-6: As discussed on page 2.0-3 of Chapter 2.0, Project Description, of the Recirculated Draft EIR, it is anticipated that during operation of the Project facilities there will be approximately 150 to 250 fulltime employees that would work from between 4 a.m. to 11 p.m. daily. The Project is anticipated to generate approximately 400 jobs during the construction phase.

Response B-7: Tables 1 and 2 of Appendix F show the TDM measures and VMT banking fees calculation. These tables are included in the Executive Summary of Appendix F. Tables 5 and 6 also show the TDM measures and VMT banking fees calculation. These tables are included in the VMT Analysis section of Appendix F. The tables are repeated in the Executive Summary as this section of the appendix summarizes the results of the VMT analysis and associated VMT mitigation.

Response B-8: The value of 806 is correct (250*24.8 = 6,200, 13%*6,200 = 806.0). This value (806) is used to calculate the potential VMT banking fee program contribution.

Response B-9: The VMT data is based on census and longitudinal employer-household dynamics information. VMT for the City's VMT Tool was determined based on a hybrid approach using the SJCOG Model and StreetLight Big Data. The population, employment, vehicle trips, mode choice, and vehicle occupancy were used from the SJCOG Model. Trip lengths were determined from the StreetLight Big Data. It is noted that, if the threshold noted by the commenter was used in the Draft EIR, the impact would likely be less and would remain significant and unavoidable.

Response B-10: As discussed on page 3.13-16 of Section 3.13, Transportation and Circulation, of the Final EIR (see Chapter 3.0: Revisions, for detail) (note: this calculation has been updated in the

Final EIR), since there are 250 employees, each employee's VMT needs to be reduced by 0.744 VMT at a cost of $633.11 per VMT the calculation is as follows:

VMT Banking Fee = 250 employees x 0.744 VMT per employee x $633.11 per VMT.

The Draft VMT Banking Fee Program calculated a fix cost per VMT reduction of $633.11 per VMT (this is a fixed value identified by the City in their Draft VMT Banking Fee Program). The 250 employees are estimated by the Project applicant. And the 0.744 VMT per employee was estimated based on the difference between the 15% reduction in VMT per employee required per SB 743 guidelines and the CEQA guidelines, and the 12% reduction in VMT per employee from the TDM measures included within the Final EIR.

Response B-11: The VMT Banking Fee calculation is based on the City's draft VMT Banking Fee. The draft VMT Banking Fee was developed as part of the City's draft VMT threshold program. Caltrans commented on the draft VMT banking program. The draft banking fee program is located on page 66 of the City's Transportation Management Plan, available here: https://www.cityoftracy.org/home/showpublisheddocument/13913/637994669600230000. Table 2.12 of the City's Transportation Management Plan shows the VMT Banking Projects that the Banking Fees would contribute funds to. These project names include: Legacy Fields Connector, Rail Trails, Channel Trails, Existing Trails Enhancements, Ace Station Connector Trail, Safe Routes to School, and Mobility Hub. See Table 2.12 for the Transportation Management Plan for the descriptions of these projects, cost estimates, etc.

The City's VMT Banking Fee has not yet been adopted. The adoption date is anticipated for late 2024/early 2025.

Response B-12: The EIR includes mitigation for a TDM Program for the Project which would reduce VMT to the extent feasible.

Page 3.13-16 of the Draft EIR states the following:

> Mitigation Measure 3.13-1, which requires travel demand management (TDM) strategies, would be required. Implementation of Mitigation Measure 3.13-1 is feasible because it is within the applicant's purview to implement and the TDM measures have been found effective in previous academic studies. However, the precise effectiveness of specific TDM strategies can be difficult to accurately measure due to a number of external factors such as employee responses to strategies and changes to technology.
>
> As part of Mitigation Measure 3:13-1, the proposed Project would be required to monitor and evaluate the effectiveness of the Project's TDM Plan and provide the results to the City of Tracy. Based on the results of the evaluation, modifications to the TDM Plan may be required by the City in order to improve effectiveness toward achieving the home-based work VMT per worker target.

Based on the above, even with the implementation of Mitigation Measure 3.13-1, the impact would remain significant and unavoidable when compared to the City of Tracy's VMT threshold of significance.

In summary, the Project would continue to be significant and unavoidable, even with implementation of the TDM strategies and fee payment.

Additionally, per Chart 6-2 of the CAPCOA *Quantifying Greenhouse Gas Mitigation Measures* (August 2010), a global maximum reduction for a suburban area can be 15%. No other feasible mitigation strategies to reduce VMT have been identified or suggested by the commenter.

Response B-13: The commentor states that the appendix labeling and order are not the same as listed in the table of contents in the September 2022 Draft EIR.

The Table of Contents contains the following appendix list:

Appendix A: Initial Study, Notice of Preparation, and NOP Comments
Appendix B: Air Quality, Greenhouse Gas, and Energy Appendices
- Appendix B.1: CalEEMod Outputs
- Appendix B.2: Energy Outputs
- Appendix B.3: Health Risk Assessment
- Appendix B.4: Analysis of Models and Tools to Correlate Project-Generated Pollutant Emissions to Health End Points
- Appendix B.5: Greenhouse Gas Efficiency Metric Methodology

Appendix C: Geotechnical Review
Appendix D: Phase I Environmental Site Assessment
Appendix E: Environmental Noise Assessment
Appendix F: Traffic Analysis
Appendix G: Water Supply Assessment
Appendix H: Costco Depot Wastewater Letter Report
Appendix I: Stormwater Quality Control Plan
Appendix J: Costco Depot Project Planning Submittal Review for Drainage and Flood

With the exception of Appendix B.5, all of the appendices listed in the Table of Contents were provided as part of the 2022 Draft EIR. There is no Appendix B.5 in the Draft EIR. However, as part of the Recirculated Draft EIR, new appendices were provided related to air quality, greenhouse gases, and energy modeling and calculation. See Appendix A of the Recirculated Draft EIR which replaces Appendix B of the 2022 Draft EIR.

Response B-14: Appendix A was included as part of the Recirculated Draft EIR to include the more recent version of the TIS (dated September 12, 2022). An earlier draft version of the TIS was unintentionally added as an appendix to the HRA. This does not affect the conclusions of the HRA. It is noted, however, that as part of the Recirculated Draft EIR, new appendices

were provided related to air quality, greenhouse gases, and energy modeling and calculation. See Appendix A of the Recirculated Draft EIR.

Response B-15: This comment is noted. This comment serves as a conclusion to the comment letter.

Water Boards

GAVIN NEWSOM, GOVERNOR
YANA GARCIA, SECRETARY FOR ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

31 October 2022

Genevieve Federighi
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
Genevieve.Federighi@cityoftracy.org

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, TRACY COSTCO DEPOT ANNEX PROJECT, SCH#2020080531, SAN JOAQUIN COUNTY

Pursuant to the State Clearinghouse's 16 September 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Tracy Costco Depot Annex Project, located in San Joaquin County.

C-1

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

C-2

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

C-2 cont'd

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

C-3

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

C-4

Clean Water Act Section 404 Permit
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

C-5

Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

C-6

Waste Discharge Requirements – Discharges to Waters of the State
If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

C-7

Dewatering Permit
If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge. C-8

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit
If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: C-9
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit
If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/ C-10

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov. C-11

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

Response to Letter C: Central Valley Regional Water Quality Control Board

Response C-1: This comment serves as an introduction to the letter and does not warrant any further response.

Response C-2: The comment provides background information regarding the responsibilities of the Central Valley Regional Water Quality Control Board (RWQCB). This information further elaborates on the regulatory setting information provided in Section 3.9, Hydrology and Water Quality, of the Draft EIR. The Water Quality Control Plan for the Central Valley Region (Basin Plan) is the guiding document for water quality and sustainable groundwater management in the region.

Response C-3: The comment provides information regarding "Antidegradation Considerations," including the Basin Plan's policy and analysis requirements for National Pollutant Discharge Elimination System (NPDES) and Waste Discharge Requirement (WDR) permitting. Project impacts to groundwater and surface water quality are addressed in Section 3.9, Hydrology and Water Quality, of the Draft EIR. Impacts were determined to be less than significant or less than significant with mitigation. The Draft EIR adequately analyzes the potential impacts to groundwater and surface water quality.

Response C-4: The comment identifies construction storm water permit requirements for projects that disturb one or more acres of soil or are part of a larger plan that in total disturbs one or more acres of soil. As described in Section 3.9, Hydrology and Water Quality, of the Draft EIR, the Project applicant would be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. To do so, the applicant(s) must prepare a Project-specific Stormwater Pollution Prevention Plan (SWPPP), which would incorporate BMPs in order to prevent or reduce to the greatest extent feasible adverse impacts to water quality from erosion and sedimentation. Therefore, the proposed Project would comply with the General Construction Stormwater Permit from the Central Valley RWQCB. The Draft EIR adequately reflects the information provided in the comment.

Response C-5: The commentor provides information regarding Section 404 of the Clean Water Act which contains permitting requirements for projects that will involve the discharge of dredged or fill material in navigable waters or wetlands. This information further elaborates on regulatory setting information provided in Section 3.4, Biological Resources, of the Draft EIR. Additionally, as discussed on page 3.4-40 of Section 3.4 of the Draft EIR, the Project site does not contain protected wetlands or other jurisdictional areas and thus there is no need for permitting associated with the federal or state Clean Water Acts. The Project site has historically been used for agricultural uses like orchards, and more recently for crops. At times the Project site is fallow, and forms an annual grassland composed of non-native annuals, before it is disked for weed abatement on-site. The small basin in the northeast corner of the site is dry most of the year, and is used to collect water runoff. The basin is

exempt from federal or state Clear Water Act jurisdiction due to it being a manmade agricultural ditch/basin. As such, a Section 404 permit is not required for the Project.

Response C-6: The commentor provides information regarding Section 401 of the Clean Water Act which contains additional requirements for projects that will involve the discharge of dredged or fill material in navigable waters or wetlands. This information further elaborates on regulatory setting information provided in Section 3.4, Biological Resources, of the Draft EIR. Additionally, as discussed in Response C-5, the Project site does not contain protected wetlands or other jurisdictional areas and there is no need for permitting associated with the federal or state Clean Water Acts. As such, a Section 401 permit is not required for the Project.

Response C-7: The commentor provides information regarding discharges to waters of the State and related Waste Discharge Requirement (WDR) permits. The commentor also discusses requirements for projects involving excavation of fill activities impacting less than 0.2 acres or 400 linear feet of non-jurisdictional waters of the State and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the State. Project impacts to groundwater and surface water quality are addressed in Section 3.9, Hydrology and Water Quality, of the Draft EIR. Impacts were determined to be less than significant or less than significant with mitigation. The Draft EIR adequately analyzes the potential impacts to groundwater and surface water quality.

Response C-8: Dewatering is not anticipated to be required as a result of construction of the proposed Project. However, should groundwater be encountered during construction and dewatering become necessary, the applicant would be required to seek the proper NPDES permit for dewatering activities.

Response C-9: As noted in Response C-8, dewatering is not anticipated to be required as a result of construction of the proposed Project. However, should groundwater be encountered during construction and dewatering become necessary, the applicant would be required to seek the proper NPDES permit for dewatering activities.

Response C-10: The comment provides information regarding requirements for NPDES and WDR permitting. Project impacts to groundwater and surface water quality are addressed in Section 3.9, Hydrology and Water Quality, of the Draft EIR. Impacts were determined to be less than significant or less than significant with mitigation. The Draft EIR adequately analyzes the potential impacts to groundwater and surface water quality.

Response C-11: This comment simply serves as a conclusion to the letter and does not raise any environmental issues.

From: wendy Tocchini <wattwendy@hotmail.com>
Sent: Friday, October 21, 2022 3:58 PM
To: Genevieve Federighi <Genevieve.Federighi@cityoftracy.org>
Subject: Costco Depot Annex Project

Genevieve

Tracy Planning Division,

My name is John Tocchini, a homeowner in the Santos ranch community. I belong to the LPA (Lammersville Preservation Association). This is an organization looking out for the safety and quality of life in this area. The present expansion of Prologis has created an infrastructure nightmare for this community. The addition of the Costco Depot Project would just compound the present unsafe diving conditions we are already experiencing. The LPA worked with the County and city to look at permanently closing Hansen Road at the south side I205 overpass. The county voted to close the road and are ready to move forward. We want the Hansen Road closed prior to staring the Costco Depot Annex Project. Please work with the county and help facilitate the closure of Hansen Road ASAP. D-1

Thank You,

John Tocchini

Sent from Mail for Windows

https://mail.google.com/mail/u/1/?ik=802be77d6b&view=pt&search=all&permthid=thread-f%3A1747888240472892128&simpl=msg-f%3A1747888240… 1/1

Response to Letter D: John Tocchini

Response D-1: The comments raised in this comment do not raise any significant environmental issues and are related instead to policy decisions concerning the City's and County's transportation and circulation system. While the comment does not raise questions about the adequacy of the Draft EIR, or a CEQA topic, the policy concerns raised in this comment will be forwarded to the decision makers for their consideration of topics beyond CEQA related environmental impacts.

BURKE, WILLIAMS & SORENSEN, LLP
1 California Street - Suite 3050
San Francisco, California 94111-5432
Voice 415.655.8100 - fax 415.655.8099
www.bwslaw.com

Direct No.: 415.655.8133
Our File No.: 07500.0005
svelyvis@bwslaw.com

October 31, 2022

Via e-mail genevieve.federighi@cityoftracy.org

City of Tracy
Planning Division
Attn: Associate Planner Genevieve Federighi
333 Civil Center Plaza
Tracy, CA 95376

Re: Costco Wholesale's Comments on the Draft Environmental Impact Report for the Tracy Costco Depot Annex Project

Dear Ms. Federighi:

Thank you for providing us the opportunity to review and comment on the Draft Environmental Impact Report ("Draft EIR" or "DEIR") prepared for the Tracy Costco Depot Annex Project, State Clearinghouse Number 2020080531. We represent and provide the comments included herein on behalf of the Project applicant, Costco Wholesale. We have carefully reviewed the Draft EIR, and find that its thorough and comprehensive analysis complies with all requirements of the California Environmental Quality Act ("CEQA"). Moreover, as explained in greater detail under the topical headings below, the Draft EIR's assumptions and analysis in several important areas are conservative such that the Project's actual, on-the-ground impacts will likely be much less than projected in the Draft EIR. While we are not advocating that any of the DEIR's conclusions be altered, the information herein bolster's the conservative analysis and conclusions of the DEIR. E-1

Executive Summary and Project Description

We would like to highlight two additional project features that are not explicitly mentioned within the Project Description, and ask that they be included as warranted:

- PG&E Solar Choice: For the Project, electrical power will be supplied by PG&E and the Project will participate in the PG&E "Solar Choice" program, which is PG&E's program to provide 100% solar electricity to customers. E-2

- Tier 3 Construction Equipment: The Project construction contractor plans to use at least Tier 3 construction equipment during construction of the Project.

E-2 cont'd

Also, the Executive Summary and Project Description sections contain a few very minor, numerical deviations in acreage. For example, the pre-Project gross acreage of the Project Site/Annexation Area totals 104.36 acres (not 101.71, 101.78 or 104.46 as indicated in the Draft EIR), which includes not only the proposed 103-acre Development Area, but also the 1.36 acres (not 1.46 acres) of federal land along the Delta Mendota Canal. These acreage figures could be corrected in the EIR, though they are inconsequential to the document's impact analyses.

Transportation and Circulation

The trip generation estimates presented in the DEIR are conservative based on the expected activity for this Project. It appears that the DEIR assumes that the Project buildings could be used for high turnover, high volume merchandise. Costco intends to use the larger of the two Project buildings (Building 2) as a Direct Delivery Center primarily for large and bulky items ordered online by Costco members for direct delivery through Market Delivery Operations located in various smaller cities in the Northern California region. Costco plans to deploy the smaller of the two Project buildings (Building 1) as an annex to the nearby Costco Depot, providing additional storage for merchandise processed through the Depot, a pallet repair facility, and a return-to-vendor facility. Given these planned uses, if Project-specific assumptions were used, the number of trips generated by the Project would be less than that reported in the DEIR. The information and data below were developed by Kittelson & Associates, Inc. on behalf of Costco.

E-3

- The DEIR reports on page 3.13-10, "the proposed Project was calculated using the e-Commerce trip generation rates provided by the Tracy Costco Depot Transportation Impact Analysis Report (Kittelson and Associates, August 28, 2017). These rates were then split into passenger car and truck trips based on Institute of Transportation Engineers' (ITE) guidance for high-cube and warehousing facilities. These rates were compared against the City trip rates and ITE trip rates. The e-commerce rates from Costco are higher than the City and ITE trip rates."

- The e-commerce daily trip rate used in the DEIR is 2.17 trips per 1,000 square feet (KSF).

- The daily trip rate for a Costco DDC is 0.38 based on data collected at Costco DDCs in Stockton, CA, Gouldsboro, PA, and Romeoville, IL.

- The daily trip rate for ITE Trip Generation Manual, 10th Edition Land Use Code 150 (Warehousing) is 1.74.

- Trip generation rates for Costco Direct Delivery Centers are lower than the Costco e-commerce trip generation rates documented in the 2017 Tracy Costco Depot Transportation Impact Analysis Report. ITE Land Use Code 150 (Warehousing) trip generation rates are lower than Costco e-commerce trip generation rates. Therefore, the trip generation estimates for the Project are higher and more conservative than would be expected for this Project and the activities anticipated on the site.

- For passenger car trip generation, the transportation analysis assumes 2,576 daily passenger car trips. Using Project-specific data, 950 daily trips would be expected. This represents 1,627 fewer daily trips (a 63% reduction).

- For truck trip generation, the transportation analysis assumes 1,224 daily truck trips. Using Project-specific data, 451 daily truck trips would be expected. This represents 773 fewer daily truck trips (a 63% reduction).

E-3 cont'd

- The combined reductions of expected daily passenger car trips would result in fewer vehicle miles traveled than reported in the DEIR. The extent to which the Project would exceed the City's VMT threshold would be lessened commensurate with the reduction in passenger car trips, thereby considerably reducing the Project's transportation impact.

In addition, the text on Draft EIR page 3.13-18 describing the vehicle ingress/egress points to/from the Project site along West Schulte Road and the length and truck queueing capacity of the truck-only third access driveway is inconsistent with the Project Description and should be revised. Draft EIR page 3.13-18 specifies only two points of vehicular ingress/egress along West Schulte Road and states that the two inbound truck-only lanes at the Project Site's northeast boundary will be 1,600 feet long and hold 42 trucks. As accurately stated in the Project Description section, the Project will provide three points of vehicle ingress/egress to/from the Project site along West Schulte Road and the two inbound truck-only lanes will each be 2,300 feet long, allowing approximately 61 trucks to queue within those lanes without spilling back to the new signalized intersection. Since this small clarification merely indicates that there will

be more capacity than described in the Transportation section, the DEIR's conclusions would not be affected by the change. E-3 cont'd

Air Quality

The Air Quality section of the DEIR is thorough and grounded in sound science and technical concepts. The points below, developed by Ramboll on behalf of Costco, indicate that the analysis and conclusions are conservative in nature.

As indicated above, the trip generation estimates presented in the DEIR are conservative based on the expected activity for this Project. If Project-specific assumptions were used, the emissions would be less than that reported in the DEIR, as follows:

- For passenger car trip generation, the air quality analysis assumes 2,576 daily passenger car trips. Using Project-specific data, the number of passenger car trips is expected to be 950 daily trips. This represents a 63% reduction to passenger car trips. As an estimate, the operational passenger mobile emissions presented in the DEIR's air quality analysis would correspondingly reduce by approximately 63%.

- For truck trip generation, the air quality analysis assumes 1,224 daily truck trips. Using Project-specific data, the number of truck trips is expected to be 451 daily trips. This represents a 63% reduction to truck trips. This would lead to a reduction to the operational mobile criteria air pollutant emissions and operational diesel particulate matter (DPM) emissions from trucks presented in the DEIR air quality emissions inventory and health risk analysis. As an estimate, the operational truck mobile emissions presented in the DEIR's air quality analysis would correspondingly reduce by approximately 63%. E-4

- With these reduced trips, the operational mobile NOx emissions would drop by 63% from 16.9 tons/year to 6.2 tons/year. This reduction would drop the overall unmitigated operational NOx emissions in Table 3.3-10 in the DEIR from 17.4 tons/year to 6.7 tons/year, which would mean the NOx emissions would no longer exceed the significance threshold.

The Air Quality section of the DEIR is also conservative in that it appears to overestimate emissions related to Transport Refrigeration Units (TRUs) based on the current regulatory requirements:

- New regulatory requirements became effective October 1, 2022, which establish that beginning December 31, 2023, TRU owners shall turn over at least 15 percent of their truck TRU fleet (defined as truck TRUs operating in California) to zero-emission technology each year (for seven years). All truck TRUs operating in California shall be zero-emission by December 31, 2029.

- The implications of these regulatory requirements will mean reduced DPM emissions from TRUs in 2024 and beyond, and also a reduction in the health risk from Project emissions.

The Project criteria air pollutant emissions were estimated using CalEEMod 2020.4.0, which uses mobile emission factors from EMFAC2017, which conservatively overestimates the Project's emissions. CARB's EMFAC2021 incorporates the latest understanding of statewide and regional vehicle activities, emissions, and recently adopted regulations such as Advanced Clean Trucks (ACT), Heavy Duty Inspection & Maintenance, and Heavy-Duty Omnibus.

- Incorporation of the rules that have been adopted since EMFAC2017 emission factors were established (and are included in EMFAC2021) would reduce the Project emissions from trucks. The assumption in EMFAC2017 for San Joaquin County in 2025 is that heavy-heavy duty truck VMT is 99.9% diesel, with just 0.1% natural gas, whereas in EMFAC2021, the heavy-heavy duty truck VMT assumption is 98% diesel, with 1.2% natural gas and 0.6% electric.

- The penetration of electric and plug-in hybrid vehicles has been updated in EMFAC2021. For San Joaquin County in 2025, the percentage of VMT that is electric is 5% and VMT that is plug-in hybrid is 3% for light-duty automobiles versus the EMFAC2017 assumption that VMT for this vehicle class is just 2.8% electric.

- In addition, there have been regulations passed after EMFAC2021 was released, including the Advanced Clean Cars II (ACC II) Regulations. Regulations such as this will reduce emissions from passenger vehicles in future years, thus reducing the Project emissions relative to those presented in the DEIR.

The Project construction air quality analysis is also conservative as it assumes that a default mix of tiered off-road equipment is utilized throughout construction, whereas the construction is planned to be conducted using at least Tier 3 construction

E-4 cont'd

equipment. Use of this higher tier of equipment will result in lower on-site off-road equipment criteria air pollutant emissions during Project construction.

Finally, the DEIR analysis does not include reductions to reflect compliance with San Joaquin Valley Air Pollution Control District (SJVAPCD)'s Regulation VIII – Fugitive PM10 Prohibitions. In compliance with these rules, the Project would water exposed area at least twice daily to reduce fugitive dust by 55 percent. If this assumption were incorporated into the DEIR, the fugitive dust emissions (i.e., construction PM10 and PM2.5 emissions) would be lower than that represented in the DEIR's air quality analysis. E-4 cont'd

Energy

The proposed Project is anticipated to consume approximately 7,939,980 kWh of electricity per year. Participation in PG&E's Solar Choice program would mean that this electricity use is provided by renewable energy.

Also, as noted above, the trip generation estimates presented in the DEIR are conservative based on the expected activity for this Project. Accordingly, the operational mobile fuel usage (gasoline and diesel) is expected to be less than that presented in the DEIR's energy analysis. E-5

Greenhouse Gases

Numerous conservative assumptions discussed above also indicate that the GHG analysis within the Draft EIR comes to conservative conclusions. Based on the expected trip activity for the Project, the GHG mobile emissions would drop from 9,386 MT CO2e/year to 3,459 MT CO2e/year (a 63% reduction). Similarly, use of EMFAC2021 would be expected to reduce the mobile GHG emissions relative to what is presented in the DEIR based on new regulations that have been adopted since the time of the emission factors used in the preparation of the GHG analysis. In addition, regulations passed after EMFAC2021 was released, including the Advanced Clean Cars II (ACC II) Regulations, are expected to increase electric vehicle penetration in later years. Regulations such as this will improve emissions from passenger vehicles, thus reducing the Project emissions relative to those presented in the DEIR. Furthermore, participation in PG&E's Solar Choice program, if presented quantitatively, would reduce the Project's GHG emissions from electricity by approximately 742 MT CO2e/year. E-6

Noise

The Draft EIR concludes that the potential increase in nighttime noise during Project operations will result in significant adverse impacts to the adjacent residential uses on the farm property west of the Project site. The Project's actual operational noise impact is likely to be much less than the Draft EIR's conservative analysis projects, and perhaps even less than significant.

First, the DEIR's operational noise impact analysis employs noise measurements from a cold storage grocery warehouse facility that were collected during one of the busiest times of the year for grocery warehouses (i.e., during the week of Thanksgiving) and included refrigeration trucks. Costco's Project depot facilities are not expected to generate such a constant level of noise or use as many refrigeration trucks.

Second, the DEIR applies the County's stricter noise impact thresholds rather than using the City's thresholds. While the City's choice to apply County thresholds given that the property to the west is currently located within the County is an appropriate conservative approach, the noise impacts would have been less severe than reported had the City used its own noise thresholds. E-7

Finally, the adjacent farm property to the west of the Project site is within the City's sphere of influence, is designated for industrial land uses in the City's General Plan and its owner has submitted a similar application to annex into the City and to construct a warehouse for industrial uses. It is appropriate for the DEIR to assume that the residential uses on the adjacent property will remain in place. However, it is quite possible that the existing residences will not be present and occupied once the Project is developed and operational. If that proves true, the Draft EIR's identified operational noise impact will not occur.

We appreciate the chance to comment on the exceptional, well-crafted and technically solid Draft EIR, and look forward to participating in the CEQA and entitlement process for the Project as it moves forward.

BURKE, WILLIAMS & SORENSEN, LLP

Sincerely,

Stephen E. Velyvis

SEV:pmr

SF #4867-5995-5260 v1

Response to Letter E: Project Applicant – Costco Wholesale (Burke, Williams, and Sorensen LLP)

Response E-1: This comment serves as an introduction to the comment letter.

Response E-2: The commentor highlights two additional project features that are not mentioned in the Draft EIR:

- PG&E Solar Choice: For the Project, electrical power will be supplied by PG&E and the Project will participate in the PG&E "Solar Choice" program, which is PG&E's program to provide 100% solar electricity to customers.
- Tier 3 Construction Equipment: The Project construction contractor plans to use at least Tier 3 construction equipment during construction of the Project.

The commentor also notes incorrect acreages in the Executive Summary. These additional project features were added to Chapter 2.0, Project Description. See Chapter 3.0, Revisions, of this Response to Comments document. The acreages in Chapter ES, Executive Summary, are consistent with the acreages discussed throughout the Draft EIR. The acreages were confirmed by GIS staff. As noted in the comment, the one-tenth of an acre difference is inconsequential to the document's impact analysis.

Furthermore, Costco has committed to several new mitigation measures as part of the Final EIR. For example, Mitigation Measure 3.3-2 requires the Project applicant to supply 100% of project electricity from renewable sources, as well as procure power from a combination of onsite solar generation and direct source renewable purchased energy. Additionally, Mitigation Measure 3.3-30 requires the Project applicant to ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines. Further, Mitigation Measure 3.3-31 requires the Project applicant to ensure that provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators shall be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%. Lastly, Mitigation Measure 3.3-32 requires that the Project must ensure that heavy-duty diesel hauling trucks that access the Project site for construction shall be model year 2010 or newer, so long as such trucks are reasonably available.

Response E-3: The commentor states that the trip generation estimates presented in the Draft EIR are conservative based on the expected activity for this Project. The commentor also discusses the intended uses of the two warehouse buildings. The commentor states that the information and data below were developed by Kittelson & Associates, Inc. on behalf of Costco.

- The Draft EIR reports on page 3.13-10, "the proposed Project was calculated using the e-Commerce trip generation rates provided by the Tracy Costco Depot

Transportation Impact Analysis Report (Kittelson and Associates, August 28, 2017). These rates were then split into passenger car and truck trips based on Institute of Transportation Engineers' (ITE) guidance for high-cube and warehousing facilities. These rates were compared against the City trip rates and ITE trip rates. The e-commerce rates from Costco are higher than the City and ITE trip rates."

- The e-commerce daily trip rate used in the Draft EIR is 2.17 trips per 1,000 square feet (KSF).
- The daily trip rate for a Costco DDC is 0.38 based on data collected at Costco DDCs in Stockton, CA, Gouldsboro, PA, and Romeoville, IL.
- The daily trip rate for ITE Trip Generation Manual, 10th Edition Land Use Code 150 (Warehousing) is 1.74.
- Trip generation rates for Costco Direct Delivery Centers are lower than the Costco e-commerce trip generation rates documented in the 2017 Tracy Costco Depot Transportation Impact Analysis Report. ITE Land Use Code 150 (Warehousing) trip generation rates are lower than Costco e-commerce trip generation rates. Therefore, the trip generation estimates for the Project are higher and more conservative than would be expected for this Project and the activities anticipated on the site.
- For passenger car trip generation, the transportation analysis assumes2,576 daily passenger car trips. Using Project-specific data, 950 daily trips would be expected. This represents 1,627 fewer daily trips (a 63% reduction).
- For truck trip generation, the transportation analysis assumes 1,224 daily truck trips. Using Project-specific data, 451 daily truck trips would be expected. This represents 773 fewer daily truck trips (a 63% reduction).
- The combined reductions of expected daily passenger car trips would result in fewer vehicle miles traveled than reported in the Draft EIR. The extent to which the Project would exceed the City's VMT threshold would be lessened commensurate with the reduction in passenger car trips, thereby considerably reducing the Project's transportation impact.

Further, the commentor's request that information regarding truck queuing capacity and ingress/egress should corrected has been addressed in Section 3.13. See Chapter 3.0 of this Response to Comments document for the correction regarding truck queuing.

Response E-4: The commentor states that the Air Quality section of the DEIR is thorough and grounded in sound science and technical concepts and provides evidence that the analysis and conclusions provided in the EIR relating to air quality are conservative in nature. For example, the commentor states that the number of passenger car trips and trucks are

expected to be approximately 63% less than that analyzed in the DEIR. The commentor also states that the DEIR is conservative in that it appears to overestimate emissions related to TRUs based on current regulatory requirements. The commentor also cites additional reasons why the air quality analysis in the DEIR was conservative.

Response E-5: The commentor states that participation in PG&E's Solar Choice program would mean that Project electricity use would be provided by renewable energy. The commentor also notes that the trip generation estimates presented in the DEIR are conservative based on the expected activity for the Project. The commentor therefore states that the operational mobile fuel usage (gasoline and diesel) is expected to be less than presented in the DEIR's analysis.

Furthermore, Costco has committed to several new mitigation measures as part of the Final EIR. For example, Mitigation Measure 3.3-2 requires the Project applicant to supply 100% of project electricity from renewable sources, as well as procure power from a combination of onsite solar generation and direct source renewable purchased energy.

Response E-6: The commentor explains and demonstrates why numerous assumptions related to the Project's energy use (i.e., operational electricity and mobile fuel use) within the DEIR are conservative.

Response E-7: The commentor summarizes the Draft EIR conclusions regarding operational noise and explains why the Draft EIR's noise impact analysis and conclusions are conservative. The commentor states that the noise measurements were taken for a cold storage grocery warehouse facility and were collected during one of the busiest times of year, the week of Thanksgiving.[1] The commentor also states that the stricter County noise thresholds were used for impacts within the County, located west of the site. The commentor further states that the adjacent property to the west will not be present and occupied once the Project is developed and operational because a similar application to annex the property into the City and to construct an industrial warehouse or industrial parking facility was submitted by the property owner.

The project application mentioned in the comment, the Schulte Warehouse/Annexation, is shown on the City's Industrial and Commercial Pipeline Report (January 2024).[2] The Schulte Warehouse/Annexation Project is located immediately adjacent/west of the Project site.

[1] It should be noted that the Project would not have any cold storage as part of its operations.

[2] Available at: https://www.cityoftracy.org/our-city/departments/planning

S J C O G, Inc.

555 East Weber Avenue • Stockton, CA 95202 • (209) 235-0600 • FAX (209) 235-0438

San Joaquin County Multi-Species Habitat Conservation & Open Space Plan (SJMSCP)

SJMSCP RESPONSE TO LOCAL JURISDICTION (RTLJ)
ADVISORY AGENCY NOTICE TO SJCOG, Inc.

To: Genevieve Federighi, City of Tracy, Planning Division

From: Laurel Boyd, SJCOG, Inc. Phone: (209) 235-0574 Email: boyd@sjcog.org

Date: September 22, 2022

-Local Jurisdiction Project Title: Tracy Costco Depot Annex Project

Assessor Parcel Number(s): 209-230-02

Local Jurisdiction Project Number: N/A

Total Acres to be converted from Open Space Use: Unknown

Habitat Types to be Disturbed: Agricultural Habitat Land

Species Impact Findings: Findings to be determined by SJMSCP biologist.

Dear Ms. Federighi:

SJCOG, Inc. has reviewed the project referral for the Notice of Availability Tracy Costco Depot Annex – Draft Environmental Impact Report. This project consists of the construction and subsequent operation of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5 miles to the west of the Project and as a Direct Delivery Center. The two buildings (approximately 543,326 square feet for Building 1 and 1,201,726 square feet for building 2, total approximately 1,745,052 square feet on the project site. The smaller Building 1 is anticipated to serve as the annex by providing additional storage for high-turnover merchandise processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a Direct Delivery Center (DDC), an ecommerce distribution center primariliy for large and bulky items ordered online by Costco members for direct delivery through Market Delivery Operations (MDO) located in various smaller cities in the Northern California region. DDC warehouses distribute ordered goods to the MDO's for delivery to members. The project site is located east of Hansen Road and south of Schulte Road, Tracy (APN/Address: 209-230-02/16000 W. Schulte Road, Tracy). F-1

The City of Tracy is a signatory to San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Participation in the SJMSCP satisfies requirements of both the state and federal endangered species acts, and ensures that the impacts are mitigated below a level of significance in compliance with the California Environmental Quality Act (CEQA). The LOCAL JURISDICTION retains responsibility for ensuring that the appropriate Incidental Take Minimization Measure are properly implemented and monitored and that appropriate fees are paid in compliance with the SJMSCP. Although participation in the SJMSCP is voluntary, Local Jurisdiction/Lead Agencies should be aware that if project applicants choose against participating in the SJMSCP, they will be required to provide alternative mitigation in an amount and kind equal to that provided in the SJMSCP.

This Project is subject to the SJMSCP. This can be up to a 30 day process and it is recommended that the project applicant contact SJMSCP staff as early as possible. It is also recommended that the project applicant obtain an information package. http://www.sjcog.org

Please contact SJMSCP staff regarding completing the following steps to satisfy SJMSCP requirements:

- Schedule a SJMSCP Biologist to perform a pre-construction survey ***prior to any ground disturbance***
- SJMSCP Incidental take Minimization Measures and mitigation requirement:

F-2

1. Incidental Take Minimization Measures (ITMMs) will be issued to the project and must be signed by the project applicant prior to any ground disturbance but no later than six (6) months from receipt of the ITMMs. If ITMMs are not signed within six months, the applicant must reapply for SJMSCP Coverage. Upon receipt of signed ITMMs from project applicant, SJCOG, Inc. staff will sign the ITMMs. This is the effective date of the ITMMs.
2. Under no circumstance shall ground disturbance occur without compliance and satisfaction of the ITMMs.
3. Upon issuance of fully executed ITMMs and prior to any ground disturbance, the project applicant must:

a. Post a bond for payment of the applicable SJMSCP fee covering the entirety of the project acreage being covered (the bond should be valid for no longer than a 6 month period); or
b. Pay the appropriate SJMSCP fee for the entirety of the project acreage being covered; or
c. Dedicate land in-lieu of fees, either as conservation easements or fee title; or
d. Purchase approved mitigation bank credits.

4. Within 6 months from the effective date of the ITMMs or issuance of a building permit, whichever occurs first, the project applicant must:
   a. Pay the appropriate SJMSCP for the entirety of the project acreage being covered; or
   b. Dedicate land in-lieu of fees, either as conservation easements or fee title; or
   c. Purchase approved mitigation bank credits.

Failure to satisfy the obligations of the mitigation fee shall subject the bond to be called.

- Receive your Certificate of Payment and release the required permit

It should be noted that if this project has any potential impacts to waters of the United States [pursuant to Section 404 Clean Water Act], it would require the project to seek voluntary coverage through the unmapped process under the SJMSCP which could take up to 90 days. It may be prudent to obtain a preliminary wetlands map from a qualified consultant. If waters of the United States are confirmed on the project site, the Corps and the Regional Water Quality Control Board (RWQCB) would have regulatory authority over those mapped areas [pursuant to Section 404 and 401 of the Clean Water Act respectively] and permits would be required from each of these resource agencies prior to grading the project site.

If you have any questions, please call (209) 235-0600.

F-2 cont

Response to Letter F: San Joaquin Council of Governments

Response F-1: This comment summarizes the proposed Project's details as well as the City of Tracy's responsibilities pursuant to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP).

Response F-2: The SJMSCP is discussed in Section 3.4, Biological Resources, of the Draft EIR. Tables 3.4-1 and 3.4-2 on pages 3.4-7 through 3.4-21 of Section 3.4 include columns that show whether each plant or animal species that has potential to occur on the Project site is covered by the SJMSCP. Background information and implementation strategies associated with the SJMSCP are also discussed on pages 3.4-25 through 3.4-27 of the Draft EIR. Mitigation Measure 3.4-1 on page 3.4-30 of the Draft EIR requires the Project proponent to 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 of incidental take and minimization Measures (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.

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

WINTER KING
Attorney
king@smwlaw.com

October 31, 2022

Via E-Mail

Genevieve Federighi, Associate Planner
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
Genevieve.Federighi@cityoftracy.org

Re: Comments on the Tracy Costco Depot Annex Draft EIR, State Clearinghouse No. 2020080531

Dear Genevieve Federighi:

On behalf of the Sierra Club, Delta Sierra Group of the Motherlode Chapter, we have reviewed the Draft Environmental Impact Report ("DEIR") prepared in connection with the proposed Tracy Costco Depot Annex Project ("Project"). The Sierra Club has serious concerns about the environmental impacts of the Project as currently proposed. As discussed in more detail below, the DEIR substantially understates, and fails to fully analyze, the severity and extent of significant project-related effects on air quality, greenhouse gas ("GHG") emissions, and public health. The environmental documentation for the Project is thus inadequate as an informational document and violates the minimum standards of adequacy under the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA "Guidelines," California Code of Regulations, title 14, § 15000 et seq. Moreover, the DEIR identifies virtually no mitigation measures to reduce the Project's impacts, even though such measures are readily available, feasible, and commonly required. The DEIR found that impacts to air quality and greenhouse gas emissions from the project were significant and unavoidable, but that does not allow the DEIR or the City to simply conclude that nothing else be done. CEQA requires that the most effective and feasible measures to reduce the impacts be adopted, even if they do not result in reducing the impacts to a less than significant level. This DEIR is woefully deficient in that regard. G-1

The proposed Project would implement construction and operation of two large warehouse buildings that would serve as an annex to the existing Costco Depot located

approximately 1.5-miles to the west of the Project and as a Direct Delivery Center. The two buildings (approximately 543,326 sf for Building 1 and 1,201,726 sf for Building 2) and related infrastructure (such as parking areas) would develop almost the entire 104-acre agricultural site with impervious surfaces. The property is currently designated as Agriculture and zoned as AG-40 Agriculture by San Joaquin County. The project includes proposed annexation of the property into the City of Tracy and pre-zoning by the City to a Light Industrial (M-1) zoning designation.

G-1 cont'd

For the reasons set forth below, it is our opinion that the DEIR does not comply with the requirements of CEQA, and must be revised and recirculated for further public review and comment. Referenced throughout these comments is an air quality report prepared by Baseline Environmental Consulting ("Baseline Report"), which is attached as Appendix A and is incorporated herein by reference. Please refer to this report for further detail and discussion of the DEIR's inadequacies with regard to impacts on air pollution and related health risks. We request that the City respond to both the comments in this letter and to each of the comments in the Baseline Report.

I. The Project Description Fails to Adequately Describe All Aspects of the Project.

Under CEQA, the inclusion in the DEIR of a clear and comprehensive description of the proposed project is critical to meaningful public review. *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193 ("*Inyo II*"). The court in *Inyo II* explained why a thorough project description is necessary:

> "A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance."

G-2

Id. at 192-93. Thus, "[a]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient DEIR." *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 830.

Here, the Project description fails to include sufficient detail about the proposed use of the facility, devoting just a couple of sentences to this topic:

> "The smaller Building 1 is anticipated to serve as an annex by providing additional storage for high-turnover merchandise

> processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor (RTV) facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a Direct Delivery Center (DDC), which is an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery. "

DEIR at 2.0-3.

G-2 cont'd

More information is needed for the public and decisionmakers to consider the Project's potential environmental impacts. For example, the Project Description must disclose how many trucks will visit the site each day, where they will be coming from, and what types of materials they will be transporting. In addition, more information is needed about where materials will be unloaded/loaded and what will be done with the materials and goods inside the warehouse (e.g., will there be construction-type work (including noise and potential odors/dust) at the pallet repair facility?), how long trucks will remain on site, what nighttime activities will occur, etc.

The Project Description also mentions in passing that the applicant is also requesting "a Conditional Use Permit to allow for food processing and canning in the proposed M-1 zoning district." DEIR at 2.0-9. But these uses are not included in the description of the intended uses of the two proposed buildings, and the DEIR fails to describe the extent of these uses. For example, there is no discussion of whether these uses would rely on refrigerated truck or storage facilities; whether they would emit odors; or where the food to be processed would be coming from. This missing information is critical to an adequate EIR, because food processing/canning facilities have different potentially significant environmental impacts than facilities that are used to transport and store non-refrigerated items. For example, the air quality and greenhouse gas emissions associated with refrigerated facilities are much higher than non-refrigerated facilities. Additionally, the noise and odor impacts associated with food processing facilities can vary widely and can be a significant environmental concern. Without having information on the specifics of how large the food processing facility might be, hours of operation, specific equipment employed for the use, etc., the impacts cannot adequately be studied.

G-3

Lastly, the figures at the end of the Project Description chapter are misleading and confusing. For example, Figure 2.0-4 does not provide a legible diagram of ingress/egress, and no diagram legibly shows where the stormwater detention basin will be. Figure 2.0-5 and 2.0-6 are confusing because they purport to show existing and proposed land uses on the same diagram. The DEIR must contain separate diagrams

G-4

showing existing and proposed uses so the public and decisionmakers can understand what is being depicted and compare existing and proposed.

G-4 cont'd

II. The DEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts.

Air pollution from significant activities in the San Joaquin Valley Air Basin includes a variety of industrial-based sources as well as on- and off-road mobile sources. These sources, coupled with geographical and meteorological conditions unique to the area, stimulate the formation of unhealthy air. DEIR at 3.3-1. San Joaquin County is in non-attainment of Ozone, PM_{10} and $PM_{2.5}$ State air quality standards. DEIR at 3.3-10. Breathing in particulate matter (PM_{10} and $PM_{2.5}$) and ground-level ozone can trigger a variety of health problems. Heavy-duty trucks are key sources of diesel pollution and toxic air contaminants (TACs) and are therefore a focus of air quality impacts. Diesel trucks emit large volumes of particulate matter (a.k.a. diesel particulate matter, or DPM), therefore contributing to health problems that include cardiovascular problems, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death.[1]

G-5

The public health risks associated with these pollutants are severe, as the DEIR acknowledges:

> "The reactivity of O3 causes health problems because it damages lung tissue, reduces lung function and sensitizes the lungs to other irritants. Scientific evidence indicates that ambient levels of O3 not only affect people with impaired respiratory systems, such as asthmatics, but healthy adults and children as well. Exposure to O3 for several hours at relatively low concentrations has been found to significantly reduce lung function and induce respiratory inflammation in normal, healthy people during exercise. This decrease in lung function generally is accompanied by symptoms including chest pain, coughing, sneezing and pulmonary congestion."

DEIR at 3.3-4.

[1] Storing Harm: the Health and Community Impacts of Goods Movement Warehousing and Logistics, January 2012, available at: https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Storing-Harm.pdf; accessed June 2, 2021.

> "Some studies indicate that DPM poses the greatest health risk among the TACs listed above. A 10- year research program demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk. In addition to increasing the risk of lung cancer, exposure to diesel exhaust can have other health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. Diesel exhaust is a major source of fine particulate pollution as well, and studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems."

G-5 cont'd

DEIR at 3.3-22.

Given these existing air quality problems and severe public health consequences, the City needs to do everything in its power to ensure new development does not exacerbate the problem. Unfortunately, the DEIR does not adequately analyze or mitigate the Project's impacts. As stated in the attached comments from Baseline Environmental Consulting (Appendix A), there are flaws in the DEIR analysis used to support the significance determinations, such as unsubstantiated and incomplete calculations for evaluating air pollutant emissions during project operation.

In addition, though the DEIR estimates the Project will generate "2,576 passenger vehicle trips and 1,224 heavy-duty truck trips per day," DEIR at 3.3-31, there is currently no proposed condition of approval limiting operations to that level. The City should impose a condition limiting the number of trucks. If the applicant wishes to increase operations in the future, they could come back to modify that condition—and conduct necessary additional CEQA review at that time.

The DEIR's evaluation of potential mitigation measures is equally flawed, if not more so. CEQA requires that (1) a project's significant impacts be fully disclosed in detail, (2) mitigation be fully enforceable and not improperly deferred, (3) the City adopt all feasible mitigation to mitigate a Project's impacts, and (4) the DEIR provide for an adequate mitigation monitoring and reporting program. Here, Tracy's General Plan provides sound guidance as well: "Developments that significantly impact air quality shall only be approved if all feasible mitigation measures to avoid, minimize or offset the impact are implemented." DEIR 3.3-13 (citing General Plan Policy AQ-1.2-P14). And to

G-6

confirm conformity with the Air District's Air Quality Attainment Plan, the California Air Resources Board requires that any new project "contain in its design all reasonably available and feasible air quality control measures." DEIR 3.3-28.

It is not clear from the DEIR what project features are incorporated, or what mitigation measures are required, to reduce the Project's air quality impacts. Instead, there are multiple references to other entities regulations: "The Project incorporates various policy and rule-required implementation measures that would reduce related emissions, including all of the current Air District rules and regulations." DEIR at 3.3-28. Additionally, the DEIR refers to the completion of a future Air Impact Assessment (compliance with San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 9510) and other regulatory compliance requirements. Such oblique references undermine CEQA's core informational purpose. Moreover, many of the regulations cited in the DEIR would not apply directly to this project, but rather apply to truck and equipment manufacturers. The USEPA Clean Trucks Plan and CARB Omnibus Low-NOx Rule are two of these rules, which are outside of the control of the Project to implement or enforce. DEIR at 3.3-22.

G-6 cont'd

These oblique references also obscure deferred mitigation measures. Feasible mitigation measures must be identified and analyzed in this DEIR. If mitigation measures are deferred until after Project approval or are so undefined that it is impossible to evaluate their effectiveness, the EIR violates CEQA. Mitigation measures may not be deferred when their effectiveness is uncertain or when deferral would prevent the DEIR from disclosing the potentially significant impacts of those measures. *Sacramento Old City Ass'n v. City Council of Sacramento*, 229 Cal.App.3d 1011, 1027-29 (1991). Uncertainties regarding the mitigation of impacts must be resolved before a lead agency may make the required CEQA findings; an agency may not rely on mitigation measures of uncertain efficacy or feasibility. *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 727 (1990). An agency may defer preparation of a plan or completion of a study only when the agency commits itself and/or the project proponent to satisfying specific performance standards that will ensure avoidance of any significant effects. *Id.*

Here, the DEIR fails to follow these mandates. For example, the DEIR refers to the indirect source rule (ISR or Rule 9510), but fails to describe how this Project will comply with it, or what any mitigation fees will be used to fund. DEIR at 3.3-15. Similarly, the DEIR refers to a requirement to submit an Employer Trip Reduction Implementation Plan (ETRIP), but does not provide any information about what this applicant has proposed to include or any means to ensure that there are meaningful results from the program. DEIR at 3.3-17.

The DEIR must be revised to identify all of the project features, external regulations, and mitigation measures designed to reduce the Project's air quality impacts, along with an analysis of how well those measures are anticipated to work. It's not enough to declare that impacts are significant and unavoidable without any analysis of how they were determined to be significant. CEQA requires that an EIR set forth, in detail, all of a project's potentially significant environmental impacts. Without this, decision makers and the public are left with no real idea as to the severity and extent of environmental impacts. See, e.g., *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1370-71; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1123; *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831 (a lead agency may not simply jump to the conclusion that impacts would be significant without disclosing to the public and decision makers information about how adverse the impacts would be). Only after describing the impacts can the DEIR identify all feasible mitigation measures for each significant impact. *Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, 653 (citing Pub. Resources Code § 21100(b)). This sequence—analyze impacts first, then identify mitigation—is crucial, as "[o]nly by [the agency] making this disclosure can others, be they courts or constituents, intelligently analyze the logic of the [agency's] decision." *Id.* at 654 (citation omitted).

G-6 cont'd

Given the project's acknowledged significant air quality impacts, the DEIR must also identify (and the City must require) additional mitigation measures to minimize these impacts. There are many examples of feasible and responsible measures to improve air quality and it is surprising that a company as progressive as Costco Wholesale has not incorporated more of these into their standard facility design. The proposed project already includes designing the proposed buildings to structurally accommodate future installation of a rooftop solar system. As such, the design of the proposed project would facilitate the future commitment to renewable energy resources. DEIR at 3.7-31. The structural aspect of rooftop solar is already being incorporated and those funds are being spent, yet the project fails to include installation of the photovoltaic system now to mitigate for the project's emissions. Similarly, the project proposes to include the infrastructure for electric vehicle charging stations but not the stations themselves. Including these charging stations is another feasible air quality mitigation measure that must be included.

The SJVAPCD published a list of measures designed to reduce air quality impacts associated with development projects, which should be consulted for application to this project. These measures are attached as Appendix B and are incorporated herein by reference. Some of the relevant measures identified by the SJVAPCD include the following:

- Adopt operational zero or near-zero (0.02 g/bhp-hr NOx) emission Heavy Duty (HHD) fleets.
- Use of on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc. from development projects to utilize zero-emissions technologies as feasible.
- Use of a "Construction Clean Fleet" that will reduce construction emissions by 20% for oxides of nitrogen (NOx) and 45% for particulate matter of 10 microns or less in size (PM_{10}) from the statewide average as estimated by the Air Resource Board ARB. A Construction Clean Fleet for a project includes all the pieces of construction equipment that are greater than 50 horse power and generate emissions from the use of an internal combustion engine related to construction activity. On average a mix of construction fleet with engine model years five (5) years or newer from the current calendar year would likely achieve the required reduction for NOx and PM_{10}.

In addition to the local air district's suggested measures, the State published additional measures in the California Sustainable Freight Initiative (a project of the California Air Resources Board). This document is attached as Appendix C and is incorporated herein by reference. Several of the measures applicable to the Costco Depot Annex project include: G-6 cont'd

- Incorporate on-site renewable energy production—solar, wind, etc.—into project design; coordinate with utility providers prior to submitting permitting applications and integrate necessary infrastructure.
- Integrate renewable energy storage to ensure adequate storage capacities, including surplus margins, to provide alternative emergency backup power.
- Commit to fully operate with zero-emissions and invest in infrastructure to support zero emission equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.
- Prioritize clean heavy duty truck parking and install zero-emission infrastructure to limit unnecessary idling, and electrify loading docks servicing trucks with TRUs or APUs.
- Incorporate fueling infrastructure to support zero-emission operations into the project to the maximum extent possible; coordinate construction plans

and activities with utility providers prior to submitting permitting applications.

- In contracting, implement a rate structure that incentivizes trucking, rail, and marine companies that utilize the lowest emitting transport technologies.

Lastly, there is a recent example of a warehouse project that is incorporating additional air quality mitigation measures into their site and building design. In Contra Costa County, the CenterPoint Properties Warehouse Distribution Facility project in North Richmond is a 555,000 square foot project on 31.5 acres. The project was approved by the County with additional conditions of approval related to minimizing air quality impacts, reducing greenhouse gas emissions, electrifying the truck fleet, and reducing energy consumption in the buildings. The final Conditions of Approval for the CenterPoint Project are attached as Appendix D and are incorporated herein by reference. G-6 cont'd

The CenterPoint project illustrates that there are multiple feasible measures available to mitigate the Project's significant air quality and greenhouse gas emissions impacts. In addition, the State Attorney General has published "Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act", attached as Appendix E and incorporated herein by reference. Lastly, the Sierra Club has drafted a list of suggested mitigation measures that should also be considered for incorporation into the DEIR, attached as Appendix F and incorporated herein by reference.. Appendices B, C, D, E, and F all contain examples of measures that are suitable for this project, and they showcase measures that are being included as commonly-utilized best practices for warehouse development. These measures address clean energy production to power the facility, moving towards electrification of truck fleets, construction BMPs to control dust, and reducing vehicle trips to the site. There is no reason that this project should not also implement these measures and bring a better project forward for the City of Tracy.

III. The DEIR's Transportation Analysis for the Project Is Inaccurate and Inadequate.

Under CEQA, a lead agency must analyze a project's transportation impacts. Pursuant to Public Resources Code Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." In particular, an EIR must address whether the Project will: G-7

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);

c. Substantially increase hazards due to a geometric design feature; or

d. Result in inadequate emergency access.

In addition, numerous General Plan policies also require new development to safely handle new traffic, ensure bicycle and pedestrian safety, connect trails, etc. Tracy General Plan, Policies CIR-1.2-P3 ("New development shall be designed to provide vehicular, bicycle and pedestrian connections with adjacent developments."); CIR-3.1-P6 ("New development shall include pedestrian and bicycle facilities internal to the development and that connect to city-wide facilities, such as parks, school, and recreational corridors, as well as adjacent development and other services."); CIR-3.1-P7 ("New development sites for commercial, employment, educational, recreational, and park-and-ride land uses shall provide bicycle parking and/or storage facilities."); CIR-4.1-P5 ("The City shall require development to provide for transit and transit-related increased modal opportunities, such as adequate street widths and curb radii, bus turnouts, bus shelters, park-and-ride lots and multi-modal transit center through the development and environmental review processes, if appropriate."). G-7 cont'd

The DEIR fails to comply with this CEQA requirement and also fails to demonstrate that the Project complies with the aforementioned General Plan requirements.[2] In particular, the DEIR analysis shows that the Project would generate 24.8 VMT per employee, exceeding the City's average VMT by *164%*. DEIR at 3.13-12. Nonetheless, the measures identified to reduce VMT would only do so by 15% (in a best-case scenario where all measures were as effective as possible). DEIR at 3.13-13. In fact, in order to reduce impacts to less than significant, the Project would have to reduce VMT to 15% below the local average.[3]

Making matters worse, the "mitigation" relied on by the DEIR is entirely hypothetical and largely deferred. As the DEIR admits, the VMT mitigation banking program has not yet been established. If it is not in place by the time mitigation is G-8

[2] Failure to comply with these General Plan requirements violates State Planning and Zoning law.
[3] Based on guidance from the Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018)

required, the DEIR simply states "the TDM program will need to achieve the full 15 percent." DEIR 3.13-13. But there is no evidence to support the conclusion that a TDM program could reduce VMT by 15%, much less reduce it below the City's Draft VMT threshold of 9.4 VMT per employee.

In fact, Table 3.13-2 seems to show the applicant's position that only two measures on the list of possible TDM measures are feasible. While that is clearly incorrect (e.g., a number of measures simply require the financial support, and there is no evidence suggesting those are infeasible), it definitely calls into question the conclusion that the City and applicant can come up with replacement measures to reduce VMT if the banking program is not in place. As noted above, an agency may defer the development of actual, specific mitigation measures only if it meets three separate requirements: (1) the EIR contains "performance standards" that will govern future actions implementing the mitigation, (2) the agency has assurances that the future mitigation will be both "feasible and efficacious," and (3) practical considerations preclude developing the mitigation before project approval. *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93-95 ("*CBE*") (rejecting "the perfunctory listing of possible mitigation measures … [that] are nonexclusive, undefined, untested and of unknown efficacy"). This standard is not met here. G-8 cont'd

In reality, there are feasible mitigation measures the City and applicant can implement now to reduce VMT. These measures include establishing an employee ride-sharing program, providing end of trip facilities such as showers and locker rooms for employees riding bikes, offering new employee commute orientation, providing preferential carpool and electric vehicle parking program, establishing an employer-sponsored vanpool from a central location determined by participating employees, employer-sponsored shuttle to/from key transit station(s) or other transit hub, four-day work week to reduce travel, and offering carpool/vanpool ride-matching services. While the DEIR states that applicants typically do not like measures that require an ongoing commitment to implement, that preference is not a valid reason under CEQA to reject a mitigation measure.

The Project must also be revised to comply with General Plan requirements for including bike storage, maintaining trail connectivity, etc. There is no evidence to suggest such measures would be infeasible.

In sum, the transportation analysis must be re-done to comply with CEQA and the General Plan. The threshold of significance must be revised to require VMT reduction below existing average VMT, additional mitigation measures and project components must be considered, and the DEIR must be recirculated for public review.

IV. The DEIR's Analysis of Project-Related Greenhouse Gas Emissions and Energy Impacts Is Flawed.

Climate Change is the defining issue of our time and we are at a defining moment. From shifting weather patterns that threaten food production, to rising sea levels that increase the risk of catastrophic flooding, the impacts of climate change are global in scope and unprecedented in scale.[4]

CEQA serves as one of the State's frontline tools in combatting climate change; careful attention to analyzing and mitigating the air quality impacts and greenhouse gas emissions of projects are paramount to improving community conditions on the local scale and combating climate change at every level. As the Supreme Court found in *Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204 ("*Newhall Ranch*"), it may not make sense to translate a general standard (in that case AB 32's requirement to reduce emissions to 1990 levels by 2020) to a specific project. In fact, *Newhall Ranch* noted that new projects—such as this Project—may require a greater level of emission reduction because "[d]esigning new buildings and infrastructure for maximum energy efficiency and renewable energy use is likely to be easier, and is more likely to occur, than achieving the same savings by retrofitting of older structures and systems." *Newhall Ranch*, 62 Cal.4th at 226. G-9

Since 2010, it has become clear from a scientific perspective that any additional GHG emissions will contribute to a serious and growing climate crisis.[5] Recognizing this reality, in 2018 Governor Brown signed Executive Order 55-18 calling for the state to achieve carbon neutrality as soon as possible and no later than 2045.[6] Given these facts on the ground, the DEIR should establish a net zero threshold for new emissions. See e.g., CARB 2017 Scoping Plan at 101 ("Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.")[7] Not only does the DEIR neglect to reference EO 55-

[4] United Nations: https://www.un.org/en/global-issues/climate-change#:~:text=Climate%20Change%20is%20the%20defining,scope%20and%20unprecedented%20in%20scale.

[5] Summary for Policymakers (SPM) presents key findings of the Working Group I (WGI) contribution to the Intergovernmental Panel on Climate Change (IPCC): https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf

[6] Executive Order to Achieve Carbon Neutrality: https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf

[7] California's 2017 Climate Change Scoping Plan: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery

18, it also fails to explain why this project should not be judged by a significance threshold requiring *no* net increase in GHG emissions, since that is the standard necessary to comply with the State's climate change plans and policies.

Here, as described in the attached comments from Baseline Environmental Consulting, the DEIR failed to comply with CEQA's requirements for analysis and mitigation. Instead, it omitted essential information about the Project's GHG impacts, understated those impacts that were disclosed, and failed to adopt even the most routine mitigation measures. Specifically, the Baseline report found the following flaws in the analysis:

a. Underestimated Emissions from Warehouse Vehicle Trips. The default trip lengths used to model GHG emissions were countywide averages for all vehicle and land use types, which are not representative of the vehicle trips generated at a warehouse. The Air Quality analysis did not provide substantial evidence to support this approach, which has resulted in a significant underestimation of the total vehicle miles travelled (VMT) and associated criteria air pollutant and GHG emissions.

b. Incomplete Analysis of Emissions from Refrigeration. The Project Description (DEIR at 2.0-4) refers to refrigeration systems in the warehouses. Additionally, the DEIR indicated that Truck Refrigeration Units (TRUs) are expected to be in use on approximately 15% of the heavy-duty trucks that travel to and from the project site for the Annex (DEIR at 3.3-33). Yet, the DEIR Air Quality analysis modeled emissions from an *unrefrigerated* warehouse. As a result, the Air quality analysis likely underestimated the operational criteria air pollutant and GHG emissions associated with energy use at a refrigerated warehouse. In addition, the air quality analysis did not include estimated criteria air pollutant and GHG emissions from the engines of TRUs during project operation. Therefore, the DEIR's analysis on operational criteria air pollutants and GHG emissions is incomplete.

G-9 cont'd

c. Inadequate Mitigation for Significant and Unavoidable Impact. The DEIR Air Quality analysis concluded that the project would have a significant and unavoidable impact for criteria air pollutant emissions. The only mitigation measure identified was MM 3.3-1, which requires the use of trucks that have a 2010 model year or newer engines. The effectiveness of this mitigation measure was not evaluated in the Air Quality analysis "*due to the difficulty in modeling the emissions...* ". This is not difficult to model and should have been provided in the DEIR analysis. It is also not clear in the DEIR if Costco would own all the trucks accessing the Costco warehouses. If some trucks are owned and operated by a third party, then MM 3.3-1 does not identify how the engine year for 3rd party truck fleets would be effectively monitored and enforced. The DEIR also discussed that the project's operational baseline NOx emissions will be

reduced by 33.3% over a period of 10 years based on an Air Impact Assessment (AIA) that will need to be prepared to comply with SJVAPCD Rule 9510. While this may be a regulatory requirement, it cannot serve as evidence of mitigation for this project, because the DEIR does not identify any feasible mitigation measures beyond MM 3.3-1 that could be included in the AIA to reduce the adverse effects of criteria air pollutant emissions. The DEIR also does not evaluate if it is feasible to reduce NOx emissions beyond 33.3% and potentially below the threshold of significance. G-9 cont'd

d. Inadequate Analysis of GHG Emissions. Based on the California Supreme Court findings for *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, a project's GHG emissions should be evaluated based on its effect on California's efforts to meet the State's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its "fair share" of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change. *Id.* at 220-23.

The DEIR analysis only evaluated the project's consistency with measures from the 2017 Scoping Plan and Regional Transportation Plan and Sustainable Communities Strategy. Demonstrating consistency with these plans does not provide evidence that an individual project would contribute its "fair share" of what will be required to achieve the State's long-term climate goals. Furthermore, these plans only address the Statewide climate goal for 2030 and do not consider California's long-term climate goal of carbon neutrality by 2045. G-10

To determine an individual project's "fair share," the DEIR analysis should focus on the design elements that need to be incorporated into the project to support carbon neutrality by 2045. The primary sources of GHG emissions from the project warehouses would be from building energy use and transportation; therefore, the DEIR should evaluate if the project can be designed to ensure it will be carbon neutral by 2045.

In addition to the issues raised in the Baseline letter, the DEIR improperly assumes that the State will handle all necessary GHG emission reductions to achieve Executive Order S-3-05's goals:

> "Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that operation of the project would be required to comply with whatever

> measures are enacted that State lawmakers decide would lead to an 80 percent reduction below 1990 levels by 2050."

DEIR at 3.7-28.

But such assumptions violate CEQA. Rather than assuming, with no evidentiary support, that the environmental problem will be handled by someone else, the DEIR needs to identify specific, feasible mitigation to reduce this Project's potential GHG impacts now. This is especially true because the Project, if approved, will be built and operational long before many of the anticipated state laws will have had time to take effect. (E.g., California Air Resource Board's Advanced Clean Truck regulation, which applies to truck manufacturers and will depend on fleet turnover to reduce emissions and transition from the conventional combustion technologies to zero emission trucks over time.)

Similarly, the DEIR's conclusion that the Project would be consistent with climate change plans and policies, and therefore would have less than significant climate change impacts, is not supported by substantial evidence. It is undisputed that this project will generate approximately 3,800 new daily vehicle trips. DEIR 3.7-30. Transportation is one of the biggest emitters of GHGs at 27% of total U.S. emissions by economic sector.[8] Yet, the DEIR adopts no mitigation to reduce GHG emissions from these trips, even though mitigation is plainly feasible. Without this mitigation, the Project will continue to be served by diesel trucks and gasoline cars, potentially for decades to come. As noted in the Air Quality section of this letter above, there are numerous feasible mitigation measures that could reduce the Project's climate change impacts that should be implemented into this EIR.

G-10 cont'd

This refusal to identify or require any mitigation for these impacts also undermines the DEIR's conclusion that the Project will have less than significant energy impacts. A project will have significant energy impacts if the Project will:

> a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

[8] US Environmental Protection Agency's Sources of Greenhouse Gas Emissions: https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions#:~:text=The%20primary%20sources%20of%20greenhouse,share%20of%20greenhouse%20gas%20emissions.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Because the project includes such minimal energy efficiency measures and doesn't incorporate renewable energy production on site despite ample opportunity to do so, it cannot be assumed that the project's energy impacts would be less than significant. In fact, *League to Save Lake Tahoe et al. v. County of Placer* (2022) 75 Cal.App.5th 63 held that that project's energy analysis was deficient because the EIR failed to analyze the project's potential use of renewable energy. The requirement to analyze renewable energy is thus a procedural requirement of CEQA.

Here, the Project will use approximately 353,602 gallons of gasoline and 817,549 gallons of diesel per year], 7,939,980 kWh of electricity per year, which is enough electricity to power over 1,100 average California homes annually[9]. The project would also use approximately 10,557,560 kBTU of natural gas per year. By failing to analyze the project's potential use of renewable energy such as solar, the DEIR is also failing to assess whether the energy needs of the project could be served by electricity generated on site and either eliminate or reduce the need for natural gas usage on site, further reducing greenhouse gas emissions by eliminating/reducing gas combustion. Yet the DEIR concludes that the Project's operational energy use would not be wasteful because "[t]he proposed Project would be responsible for conserving energy, including through the mitigation measures provided throughout this EIR, as well as through the implementation of statewide and local measures." DEIR at 3.7-33. Without a list of actual mitigation measures and state and local measures requiring conservation of energy, and an analysis of their effects, there is absolutely no support for the DEIR's conclusion that operational energy use would have less than significant impacts.

G-10 cont'd

The DEIR's analysis of construction energy use is even wobblier. That "analysis" relies on an unsupported assumption to conclude energy use will not be wasteful or inefficient:

> "[I]t is reasonable to assume that the overall construction schedule and process would be designed to be as efficient as feasible in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for

[9] U.S. Energy Information Administration: https://www.eia.gov/consumption/residential/reports/2009/state_briefs/pdf/ca.pdf

> further future efficiency gains during construction are limited."

DEIR at 3.7-32.

This assumption is not reasonable, nor is it supported by substantial evidence, which is defined as "the degree of relevant evidence which a reasonable person, considering the record as a whole, might accept as adequate to support a conclusion, even though other reasonable persons might disagree. The best way to reduce these energy impacts would be to require use of low-emissions, electric or zero emissions equipment. There is no reason to assume that the applicant will acquire and use such efficient equipment absent enforceable requirements to do so (i.e., mitigation measures). G-10 cont'd

With respect to transportation, the project could be designed to provide sufficient electric vehicle (EV) charging stations for cars as well as for heavy-duty trucks to support the shift to EVs. The DEIR does not evaluate these potential energy mitigation measures, contrary to CEQA.

In short, CEQA requires more when it comes to analyzing a project's energy impacts and identifying mitigation measures that would support a "less-than-significant" conclusion. Here, the Project would clearly use very large amounts of energy, and there are numerous feasible mitigation measures referenced earlier in this letter and included as Appendices C, D, E and F that could make the Project more efficient. As a result, the DEIR must be revised to consider these mitigation measures and their effect.

V. The Project Does Not Comply with the Tracy General Plan

As noted in previous sections of this letter, the Project is inconsistent with numerous mandatory General Plan policies including Policies: AQ-1.2-P3 ("Developers shall implement best management practices to reduce air pollutant emissions associated with the construction and operation of development projects."); AQ-1.2-P14 ("Developments that significantly impact air quality shall only be approved if all feasible mitigation measures to avoid, minimize or offset the impact are implemented."); AQ-1.2-P15. ("Encourage businesses to electrify loading docks or implement idling-reduction systems so that trucks transporting refrigerated goods can continue to power cab cooling elements during loading, layovers, and rest periods."); AQ-1.4-P3. ("The City shall be proactive in reducing greenhouse gas emissions from City operations as well as new or renovated development."); CIR-1.2-P3 ("New development shall be designed to provide vehicular, bicycle and pedestrian connections with adjacent developments."); CIR-3.1-P6 ("New development shall include pedestrian and bicycle facilities internal to the development and that connect to city-wide facilities, such as parks, school, and G-11

recreational corridors, as well as adjacent development and other services."); CIR-3.1-P7 ("New development sites for commercial, employment, educational, recreational, and park-and-ride land uses shall provide bicycle parking and/or storage facilities."); and CIR-4.1-P5 ("The City shall require development to provide for transit and transit-related increased modal opportunities, such as adequate street widths and curb radii, bus turnouts, bus shelters, park-and-ride lots and multi-modal transit center through the development and environmental review processes, if appropriate."). The DEIR fails to analyze the Project's consistency with these policies, and such inconsistencies mean the City cannot, legally, approve the Project.

The State Planning and Zoning Law (Gov't Code § 65000 et seq.) requires that development decisions be consistent with the jurisdiction's general plan. See Gov't Code §§ 65860 (requiring consistency of zoning to general plan), 66473.5 & 66474 (requiring consistency of subdivision maps to general plan), and 65359 and 65454 (requiring consistency of specific plan and other development plan and amendments thereto to general plan). Thus, "[u]nder state law, the propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." *Resource Defense Fund v. County of Santa Cruz* (1982) 133 Cal.App.3d 800, 806. Accordingly, "[t]he consistency doctrine [is] the linchpin of California's land use and development laws; it is the principle which infuses the concept of planned growth with the force of law." *Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1336. G-11 cont'd

It is an abuse of discretion to approve a project that "frustrate[s] the General Plan's goals and policies." *Napa Citizens for Honest Gov't v. Napa County* (2001) 91 Cal.App.4th 342, 379. The project need not present an "outright conflict" with a general plan provision to be considered inconsistent; the determining question is instead whether the project "is compatible with and will not frustrate the General Plan's goals and policies." *Napa Citizens*, 91 Cal.App.4th at 379. Here, the proposed Project does more than just frustrate the General Plan's goals. It is directly inconsistent with numerous policies in the General Plan. Consequently, the Project cannot be approved in its current form. Conflict with General Plan policies also presents an environmental impact requiring further CEQA analysis in that the Project does indeed 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 (CEQA Guideline Appendix G Land Use and Planning section).

VI. Conclusion

As set forth above, the DEIR does not come close to satisfying CEQA's requirements. At a fundamental level, it fails to provide an adequate and complete G-12

analysis of Project impacts and feasible mitigation measures. For these reasons, the Sierra Club respectfully requests that the City deny the Tracy Costco Depot Annex as proposed. All of these impacts must be more fully analyzed and mitigated before the City may approve the Project.

On a broader scale, the Sierra Club is monitoring warehouse project development in the cities of Stockton, Tracy, Lathrop, and Manteca and we will be submitting similar comments on all upcoming projects throughout these jurisdictions. In Tracy, according to the City's website, there are several large warehouse projects that are "being reviewed by the City." The Club will monitor and submit comments on these upcoming projects and their environmental analyses. Our hope is that the City of Tracy will agree to apply similar effective mitigation measures for all warehouse projects, so that all applicants are playing on a level field. The Sierra Club wishes to meet with City Staff to discuss this at your earliest convenience. G-12 cont'd

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Winter King

Appendices:
Appendix A: Baseline Environmental Consulting letter with Attachment A, dated October 27, 2022
Appendix B: San Joaquin Valley Air Pollution Control District Land Use Design Element and Mitigation Measures (undated)
Appendix C: California Sustainable Freight Initiative Freight Handbook Concept Paper (December 2019)
Appendix D: Conditions of Approval for CenterPoint Properties (May 22, 2022)
Appendix E: State Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act
Appendix F: Suggested Mitigation Measures

cc: Sierra Club, Delta Sierra Group of the Motherlode Chapter

Appendix A

BASELINE ENVIRONMENTAL CONSULTING

27 October 2022
22221-00

Carmen J. Borg
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421

Subject: **Review of Air Quality and Greenhouse Gas Impacts Analyzed in the Draft DEIR for the Tracy Costco Depot Annex Project**

Dear Ms. Borg:

Baseline Environmental Consulting (Baseline) has reviewed the Draft Environmental Impact Report (DEIR) for the Tracy Costco Depot Annex Project (project) in the City of Tracy to determine whether potential environmental impacts related to air quality and greenhouse gas (GHG) emissions are appropriately evaluated. Based on our review, we have identified flaws in the DEIR analysis used to support the significance determinations, such as unsubstantiated and incomplete calculations for evaluating air pollutant emissions during project operation. The specific concerns identified in the DEIR analysis for potential environmental impacts related to air quality and GHG emissions are described in detail below. G-13

Incomplete and Unsubstantiated Analysis of Criteria Air Pollutant and GHG Emissions from Operation of the Proposed Project

The DEIR estimated the project's criteria air pollutant and GHG emissions from warehouse operations using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. The predominant source of emissions from warehouse operations are from vehicle trips. CalEEMod estimates emissions based on the total vehicle miles travelled (VMT) for each type of vehicle trip generated by the project. The VMT and associated emissions are estimated in CalEEMod based on trip generation rates and travel distances for each vehicle type. Nitrogen oxides (NOx) and GHG emissions are considered the most common air pollutants of concern for warehouse projects due to the relatively high volume of diesel trucks generated by facility operations. G-14

Underestimated Emissions from Warehouse Vehicle Trips

Based on page 710 of the DEIR, the total daily trip generation rate for the project was calculated using the AM and PM peak hour E-commerce trip generation rates provided by Kittlesons' *Tracy Costco Depot Transportation Impact Analysis Report and Trip generation* (2017) and the daily trip generation rate to AM plus PM peak hour trip generation rate ratio from ITE 154 - High-Cube Transload & Short-Term Storage Warehouse. The total daily trip G-15

388 17th Street, Suite 230, Oakland, CA 94612 | P: (510) 420-8686 | www.baseline-env.com

generation rates were then split into passenger car and truck trips based on ITE guidance for high-cube and warehousing facilities (percentage of passenger car vehicles: 67.8%). The project includes the construction and subsequent operation of two warehouse buildings that would serve as an annex (Annex) to the existing Costco Depot located approximately 1.5-miles to the west of the project and as a Direct Delivery Center (DDC). The traffic analysis used the same trip generation rate and fleet mix for these two warehouse buildings despite the difference in the proposed uses.

Based on the CalEEMod output files in Appendix B.1 of the DEIR, the DEIR Air Quality analysis used numerous CalEEMod default parameters (e.g., trip length, trip type, and trip percentage) to estimate VMT, and assumed that all passenger vehicle trips and heavy-duty truck trips would travel about 10.6 miles per trip on average. The CalEEMod's default trip lengths are countywide averages for all vehicle and land use types, which are not representative of the vehicle trips generated at a warehouse. The Air Quality analysis did not provide substantial evidence to support this approach, which has resulted in a significant underestimation of the total vehicle miles travelled (VMT) and associated criteria air pollutant and GHG emissions.

G-15 cont'd

Trip characteristics more representative of the proposed project are discussed below:

- **Trip lengths**. For passenger vehicles, the traffic analysis estimated that the project would generate 24.8 VMT per employee per day. Therefore, the one-way trip length for a worker commute trip would be 12.4 miles. For heavy-duty truck trips, based on the average distance to other nearby Costco warehouses[1] that could be supported by the proposed project, it would be reasonable to assume trucks travel an average of about 28 miles per trip for the DDC. It is assumed that the trip length for the Annex is the same as the DDC due to the lack of specific trip length information provided for the Annex.

- **Trip Percentage**. The DEIR Air Quality analysis used the CalEEMod default trip type percentages for both worker commute trips and heavy-duty truck trips: 59% of the trips were commercial-work trips (commuting) and 41% of the trips were commercial-nonwork trips (delivery). The DEIR Air Quality analysis provides no explanation or justification for not differentiating trip types based on vehicle types. Based on the proposed use of the warehouse, it would be reasonable to assume that 100% of the passenger vehicle trips will be worker commute trips and 100% of the heavy-duty truck trips will be delivery trips.

The project's daily VMT estimations were updated using the same trip generation rates from the DEIR Air Quality analysis and the suggested trip lengths and trip percentages described above. As shown in **Table 1**, the updated average daily VMT for passenger vehicles is about 17%

[1] Distances to Costco warehouses in nearby cities: Manteca (14 miles away), Modesto (26 mile), Stockton (30 miles), and Turlock (42 miles).

higher than what was estimated in the DEIR. The updated average daily VMT for trucks is about 164% higher than the truck VMT estimated in the DEIR Air Quality analysis. The average daily VMT for trucks is greatly underestimated in the DEIR.

Table 1. Project Trip Generation Assumptions and VMT Estimates

Land Use	Vehicle Type	Daily Trip Rate (Trips/KSF)	Trip Length (Miles/Trip)	Daily Trips	Daily VMT Estimated by CalEEMod	Total Daily VMT Estimated by CalEEMod
DEIR[A]						
Costco Ecommerce Warehouse	Passenger	1.48	10.6	2,576	27,267	40,222
	Truck	0.70	10.6	1,224	12,956	
Updated Analysis[B]						
Costco Ecommerce Warehouse	Passenger	1.48	12.4	2,576	31,855	66,033
	Truck	0.70	28	1,224	34,178	

Notes: KSF = thousand square feet; VMT = vehicle miles travelled

[A] Trip generation rate and travel distance were derived from page 710 and page 621 of the DEIR. The traffic analysis in the DEIR used the same trip generation rate and fleet mix for the proposed two warehouse buildings. Therefore, the two warehouses' trips are combined in the analysis. The trip generation rates for passenger vehicles and trucks used in the DEIR were calculated by dividing the overall trip generation rate by the percentage of passenger vehicles and trucks reported in the DEIR. The average one-way trip lengths used in the DEIR were calculated by dividing the annual VMT by the total trips per day and 365 days per year.

[B] The one-way travel distance for passenger cars is based on the VMT per employee provided in the traffic analysis. It was assumed that 100% of the passenger vehicle trips and heavy-duty truck trips will be worker commute trips and delivery trips, respectively. The DEIR traffic analysis did not specify one-way travel distance for heavy-duty trucks. The travel distance for trucks is assumed to be 28-mile based on the use of the project. All trips are modeled as primary trips.

G-15 cont'd

Baseline has prepared an updated analysis of the NOx emissions from vehicle trips that would be generated by the proposed warehouses based on the updated VMT estimates. The same version of CalEEMod (version 2020.4.0) was used to provide an updated estimate of the project's maximum daily NOx emissions from warehouse passenger trips and truck trips. A copy of the CalEEMod report for the updated analysis is included as **Attachment A**. As shown in **Table 2**, the updated estimate of the project's annual NOx emissions from warehouse vehicle trips is about 37.0 tons per year, which is about 19.6 tons higher than the annual NOx emissions estimated in the DEIR Air Quality analysis and exceeds the San Joaquin Valley Air Pollution Control District's (SJVAPCD's) threshold of significance (10 tons per year) by about 27.0 tons. As a result, the overall NOx emissions from project operation would be about 113% higher than emissions estimated in the DEIR Air Quality analysis. Similarly, the other criteria air pollutants and GHG emissions from vehicle trips have also be underestimated in the DEIR analysis.

BASELINE ENVIRONMENTAL CONSULTING

Table 2. Annual NOx Emissions (tons per year) at the Project Site

Source	DEIR[A] (tons/year)	Baseline's Updated Analysis[B] (tons/year)
Area	<0.01	Same as DEIR
Energy Source	0.52	Same as DEIR
Mobile - Warehouse Passenger Trips	16.9	0.51
Mobile - Warehouse Truck Trips		36.5
Total Annual Emissions	17.4	37.0
SJVAPCD Threshold	**10**	**10**
Threshold Exceeded?	**Yes**	**Yes**

Notes: NOx = nitrogen oxides; tons/year =tons per year; -- = not reported; SJVAPCD = San Joaquin Valley Air Pollution Control District

[A] DEIR NOx emissions are based on page 605 of the DEIR.

[B] Mobile NOx emissions are updated based on suggested traffic inputs for warehouse operations.

G-15 cont'd

Incomplete Analysis of Emissions from Refrigeration

The project description (page 42 of the DEIR) indicates that there would be refrigeration systems in the warehouses. Additionally, the DEIR indicated that Truck Refrigeration Units (TRUs) are expected to be in use in approximately 15% of the heavy-duty trucks that travel to and from the project site for the Annex (Page 123 of the DEIR). For the Annex, the DEIR Air Quality analysis modeled emissions from an unrefrigerated warehouse. As a result, the Air quality analysis likely underestimated the operational criteria air pollutant and GHG emissions associated with energy use at a refrigerated warehouse. In addition, the air quality analysis did not include estimate criteria air pollutant and GHG emissions from the engines of TRUs during project operation. Therefore, the DEIR's analysis on operational criteria air pollutants and GHG emissions is incomplete.

G-16

Inadequate Mitigation for Significant and Unavoidable Impact

The DEIR Air Quality analysis concluded that the project would have a significant and unavoidable impact for criteria air pollutant emissions. The only mitigation measure identified was MM 3.3-1, which requires the use of trucks that have a 2010 model year or newer engines. The effectiveness of this mitigation measure was not evaluated in the Air Quality analysis "*due to the difficulty in modeling the emissions…*". This is not difficult to model and should have been provided in the DEIR analysis. It is also not clear in the DEIR if Costco would own all the trucks accessing the Costco warehouses. If some trucks are owned and operated by a 3rd party, then MM 3.3-1 does not identify how the engine year for 3rd party truck fleets would be effectively monitored and enforced.

G-17

The DEIR also discussed that the project's operational baseline NOx emissions will be reduced by 33.3% over a period of 10 years based on an Air Impact Assessment (AIA) that will need to be prepared to comply with SJVAPCD Rule 9510. While this is a regulatory requirement, it appears to be acting as deferred mitigation. The DEIR does not identify any feasible mitigation measures beyond MM 3.3-1 that could be included in the AIA to reduce the adverse effects of criteria air pollutant emissions. The DEIR also does not evaluate if it is feasible to reduce NOx emissions beyond 33.3% and potentially below the threshold of significance.

Under CEQA, a project must evaluate all feasible mitigation measures to reduce the adverse effects of a significant an unavoidable impact to the maximum extent. For example, the running NOx emissions from heavy-duty trucks that have a 2014 model year engine are about 77% lower than the running NOx emissions from heavy-duty trucks with a 2010 model year engine. The DEIR doesn't provide justification to support the use of 2010 model year engines in MM 3.3-1 when the use of 2014 or later model engine years is feasible and would provide a substantially greater reduction in criteria air pollutant emissions. The DEIR does not evaluate other potential mitigation measures, such as providing electrical hookups at loading docks to power TRUs or installing electric vehicle supply equipment and/or 'EV Ready Spaces' to service future heavy-duty vehicles. As a result, the DEIR provided an inadequate analysis of mitigation measures that can reduce the significant adverse effects of criteria air pollutant emission to the maximum extent feasible.

G-17 cont'd

Inadequate Analysis of GHG Emissions

Based on the California Supreme Court findings for *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), a project's GHG emissions should be evaluated based on its effect on California's efforts to meet the State's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its "fair share" of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223).

The DEIR analysis only evaluated the project's consistency with measures from the 2017 Scoping Plan and Regional Transportation Plan and Sustainable Communities Strategy. Demonstrating consistency with these plans does not provide evidence that an individual project would contribute its "fair share" of what will be required to achieve the State's long-term climate goals. Furthermore, these plans only address the Statewide climate goal for 2030 and do not consider California's long-term climate goal of carbon neutrality by 2045.

G-18

To determine an individual project's "fair share," the DEIR analysis should focus on the design elements that need to be incorporated into the project to support carbon neutrality by 2045. The primary sources of GHG emissions from the project warehouses would be from building

BASELINE ENVIRONMENTAL CONSULTING

energy use and transportation; therefore, the DEIR should evaluate if the project can be designed to ensure it will be carbon neutral by 2045.

With respect to building energy use, the project could replace natural gas with electric power which will support California's transition away from fossil fuel–based energy sources and will bring the project's GHG emissions associated with building energy use down to zero as the electric supply becomes 100 percent carbon free. With respect to transportation, the project could be designed to provide sufficient electric vehicle (EV) charging infrastructure for heavy-duty trucks to support the shift to EVs. The DEIR does not evaluate the use of all-electric buildings or EV charging infrastructure for heavy-duty trucks. Therefore, the DEIR analysis of the project's impact from GHG emissions on the environment relative to meeting the State's long-term climate action goal of carbon neutrality by 2045 is inadequate.

G-18 cont'd

Attachment A

CalEEMod Outputs

Type text here

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Tracy Costco Warehouse - Passenger trips

San Joaquin Valley Unified APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	1,745.06	1000sqft	40.06	1,745,060.00	0
Other Asphalt Surfaces	62.94	Acre	62.94	2,741,666.40	0

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.7	**Precipitation Freq (Days)**	45
Climate Zone	2			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total warehouse building area: 543,330 (bldg 1) +1,201,730 (bldg 2)=1,745,060 square feet.

Construction Phase - Information obtained from DEIR Appendix B.1

Trips and VMT -

Grading -

Vehicle Trips - Trip generation rate based on the daily trip generation rate and fleet mix reported in Appenix B.3 Appendix 2. Non-Res C-W Trip length was back calculated using the project generated VMT per employee provided in the traffic analysis.

Fleet Mix - Assumed passenger trips are 100% LDA, heavy-duty truck trips are 100% HHD

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.00
tblFleetMix	LDA	0.52	1.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFleetMix	LDT1	0.05	0.00
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.4230e-003	0.00
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.16	0.00
tblFleetMix	MH	3.3950e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	6.4900e-004	0.00
tblFleetMix	SBUS	1.4390e-003	0.00
tblFleetMix	UBUS	3.1300e-004	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TL	14.70	12.40
tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	1.74	1.48
tblVehicleTrips	SU_TR	1.74	1.48
tblVehicleTrips	WD_TR	1.74	1.48

2.0 Emissions Summary

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4171	1,775.4171	0.1712	0.0977	1,808.8132
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0668	1,468.0669	0.0808	0.0881	1,495.8531
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4171**	**1,775.4171**	**0.1712**	**0.0977**	**1,808.8132**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4165	1,775.4165	0.1712	0.0977	1,808.8126
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0667	1,468.0667	0.0808	0.0881	1,495.8530
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4165**	**1,775.4165**	**0.1712**	**0.0977**	**1,808.8126**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2023	3-31-2023	0.9746	0.9746
2	4-1-2023	6-30-2023	1.1386	1.1386
3	7-1-2023	9-30-2023	1.4177	1.4177
4	10-1-2023	12-31-2023	2.0382	2.0382
5	1-1-2024	3-31-2024	1.9374	1.9374
6	4-1-2024	6-30-2024	0.5283	0.5283
7	7-1-2024	9-30-2024	3.9234	3.9234
		Highest	3.9234	3.9234

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,298.0353	1,298.0353	0.1297	0.0247	1,308.6476
Mobile	0.4699	0.5134	8.5648	0.0310	4.2982	0.0182	4.3164	1.1417	0.0168	1.1585	0.0000	2,931.3599	2,931.3599	0.0578	0.0867	2,952.6894
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.7914	1.0311	9.0162	0.0341	4.2982	0.0576	4.3558	1.1417	0.0562	1.1979	461.0045	4,431.4608	4,892.4653	33.0482	0.4059	5,839.6120

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,298.0353	1,298.0353	0.1297	0.0247	1,308.6476
Mobile	0.4699	0.5134	8.5648	0.0310	4.2982	0.0182	4.3164	1.1417	0.0168	1.1585	0.0000	2,931.3599	2,931.3599	0.0578	0.0867	2,952.6894
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.7914	1.0311	9.0162	0.0341	4.2982	0.0576	4.3558	1.1417	0.0562	1.1979	461.0045	4,431.4608	4,892.4653	33.0482	0.4059	5,839.6120

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2023	5/5/2023	5	120	
2	Grading	Grading	5/8/2023	9/8/2023	5	310	
3	Building Construction	Building Construction	9/9/2023	4/5/2024	5	3100	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	Paving	Paving	4/8/2024	6/28/2024	5	220	
5	Architectural Coating	Architectural Coating	6/29/2024	12/13/2024	5	220	

Acres of Grading (Site Preparation Phase): 180

Acres of Grading (Grading Phase): 930

Acres of Paving: 62.94

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 2,617,590; Non-Residential Outdoor: 872,530; Striped Parking Area: 164,500 (Architectural Coating – sqft)

OffRoad Equipment

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

Trips and VMT

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	1,884.00	735.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	377.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5281	150.5281	0.0487	0.0000	151.7452
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5281**	**150.5281**	**0.0487**	**0.0000**	**151.7452**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5280	150.5280	0.0487	0.0000	151.7451
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5280**	**150.5280**	**0.0487**	**0.0000**	**151.7451**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4084	245.4084	0.0794	0.0000	247.3927
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4084**	**245.4084**	**0.0794**	**0.0000**	**247.3927**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0497
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0497**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4082	245.4082	0.0794	0.0000	247.3924
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4082**	**245.4082**	**0.0794**	**0.0000**	**247.3924**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0487
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0487**

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7219	92.7219	0.0221	0.0000	93.2733
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7219**	**92.7219**	**0.0221**	**0.0000**	**93.2733**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2800e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7218	92.7218	0.0221	0.0000	93.2732
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7218**	**92.7218**	**0.0221**	**0.0000**	**93.2732**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2900e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1472	81.1472	0.0192	0.0000	81.6269
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1472**	**81.1472**	**0.0192**	**0.0000**	**81.6269**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1471	81.1471	0.0192	0.0000	81.6268
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1471**	**81.1471**	**0.0192**	**0.0000**	**81.6268**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0796	60.0796	0.0194	0.0000	60.5654
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0796**	**60.0796**	**0.0194**	**0.0000**	**60.5654**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0795	60.0795	0.0194	0.0000	60.5653
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0795**	**60.0795**	**0.0194**	**0.0000**	**60.5653**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4699	0.5134	6.5649	0.0310	4.2992	0.0182	4.3164	1.1417	0.0169	1.1585	0.0000	2,931.359 9	2,931.359 9	0.0578	0.0867	2,952.669 4
Unmitigated	0.4699	0.5134	6.5649	0.0310	4.2992	0.0182	4.3164	1.1417	0.0169	1.1585	0.0000	2,931.359 9	2,931.359 9	0.0578	0.0867	2,952.669 4

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	2,576.01	2,576.01	2576.01	11,627,087	11,627,087
Total	2,576.01	2,576.01	2,576.01	11,627,087	11,627,087

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	12.40	6.60	6.60	100.00	0.00	0.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.517111	0.052324	0.170960	0.155671	0.027786	0.007423	0.013424	0.026160	0.000649	0.000313	0.023324	0.001439	0.003395
Unrefrigerated Warehouse-No Rail	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
NaturalGas Mitigated	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
NaturalGas Unmitigated	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

6.0 Area Detail

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Unmitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2704					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.5300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2794					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.6300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	**8.2645**	**1.5000e-004**	**0.0166**	**0.0000**		**6.0000e-005**	**6.0000e-005**		**6.0000e-005**	**6.0000e-005**	**0.0000**	**0.0323**	**0.0323**	**9.0000e-005**	**0.0000**	**0.0344**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	330.0596	13.1822	0.3145	753.3210
Unmitigated	330.0596	13.1822	0.3145	753.3210

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	332.9783	19.6785	0.0000	824.9395
Unmitigated	332.9783	19.6785	0.0000	824.9395

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

9.0 Operational Offroad

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Tracy Costco Warehouse - Heavy-duty Truck trips

San Joaquin Valley Unified APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	1,745.06	1000sqft	40.06	1,745,060.00	0
Other Asphalt Surfaces	62.94	Acre	62.94	2,741,666.40	0

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.7	**Precipitation Freq (Days)**	45
Climate Zone	2			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total warehouse building area: 543,330 (bldg 1) +1,201,730 (bldg 2)=1,745,060 square feet.

Construction Phase - Information obtained from DEIR Appendix B.1

Trips and VMT -

Grading -

Vehicle Trips - Trip generation rate based on the daily trip generation rate and fleet mix reported in Appenix B.3 Appendix 2. Assumed 30 miles per truck trip.

Fleet Mix - Assumed passenger trips are 100% LDA, heavy-duty truck trips are 100% HHD

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	1.00
tblFleetMix	LDA	0.52	0.00

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFleetMix	LDT1	0.05	0.00
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.4230e-003	0.00
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.16	0.00
tblFleetMix	MH	3.3950e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	6.4900e-004	0.00
tblFleetMix	SBUS	1.4390e-003	0.00
tblFleetMix	UBUS	3.1300e-004	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblVehicleTrips	CNW_TL	6.60	26.00
tblVehicleTrips	CNW_TTP	41.00	100.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	1.74	0.70
tblVehicleTrips	SU_TR	1.74	0.70
tblVehicleTrips	WD_TR	1.74	0.70

2.0 Emissions Summary

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4171	1,775.4171	0.1712	0.0977	1,808.8132
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0668	1,468.0669	0.0808	0.0881	1,495.8531
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4171**	**1,775.4171**	**0.1712**	**0.0977**	**1,808.8132**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4165	1,775.4165	0.1712	0.0977	1,808.8126
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0667	1,468.0667	0.0808	0.0881	1,495.8530
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4165**	**1,775.4165**	**0.1712**	**0.0977**	**1,808.8126**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2023	3-31-2023	0.9746	0.9746
2	4-1-2023	6-30-2023	1.1386	1.1386
3	7-1-2023	9-30-2023	1.4177	1.4177
4	10-1-2023	12-31-2023	2.0382	2.0382
5	1-1-2024	3-31-2024	1.9374	1.9374
6	4-1-2024	6-30-2024	0.5283	0.5283
7	7-1-2024	9-30-2024	3.9234	3.9234
		Highest	3.9234	3.9234

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,298.0353	1,298.0353	0.1297	0.0247	1,308.6476
Mobile	0.5534	38.4804	6.6821	0.1722	5.3332	0.3703	5.7035	1.4659	0.3543	1.8202	0.0000	16,557.4948	16,557.4948	0.0652	2.6036	17,334.9781
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.8748	37.0081	7.1334	0.1753	5.3332	0.4097	5.7429	1.4659	0.3937	1.8598	461.0045	19,057.5957	18,518.8003	33.0555	2.9427	20,221.9207

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,298.0353	1,298.0353	0.1297	0.0247	1,308.6476
Mobile	0.6534	38.4804	6.6821	0.1722	5.3333	0.3703	5.7035	1.4659	0.3543	1.8202	0.0000	16,557.4948	16,557.4948	0.0652	2.6036	17,334.9781
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.8748	37.0081	7.1334	0.1753	5.3332	0.4097	5.7429	1.4659	0.3937	1.8598	461.0045	19,057.5957	18,518.8003	33.0555	2.9427	20,221.9207

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2023	5/5/2023	5	120	
2	Grading	Grading	5/8/2023	9/8/2023	5	310	
3	Building Construction	Building Construction	9/9/2023	4/5/2024	5	3100	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	Paving	Paving	4/8/2024	6/28/2024	5	220	
5	Architectural Coating	Architectural Coating	6/29/2024	12/13/2024	5	220	

Acres of Grading (Site Preparation Phase): 180

Acres of Grading (Grading Phase): 930

Acres of Paving: 62.94

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 2,617,590; Non-Residential Outdoor: 872,530; Striped Parking Area: 164,500 (Architectural Coating – sqft)

OffRoad Equipment

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

Trips and VMT

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	1,884.00	735.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	377.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5281	150.5281	0.0487	0.0000	151.7452
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5281**	**150.5281**	**0.0487**	**0.0000**	**151.7452**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5280	150.5280	0.0487	0.0000	151.7451
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5280**	**150.5280**	**0.0487**	**0.0000**	**151.7451**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4084	245.4084	0.0794	0.0000	247.3927
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4084**	**245.4084**	**0.0794**	**0.0000**	**247.3927**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0497
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0497**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4082	245.4082	0.0794	0.0000	247.3924
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4082**	**245.4082**	**0.0794**	**0.0000**	**247.3924**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0487
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0487**

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7219	92.7219	0.0221	0.0000	93.2733
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7219**	**92.7219**	**0.0221**	**0.0000**	**93.2733**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2800e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7218	92.7218	0.0221	0.0000	93.2732
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7218**	**92.7218**	**0.0221**	**0.0000**	**93.2732**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2900e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1472	81.1472	0.0192	0.0000	81.6269
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1472**	**81.1472**	**0.0192**	**0.0000**	**81.6269**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1471	81.1471	0.0192	0.0000	81.6268
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1471**	**81.1471**	**0.0192**	**0.0000**	**81.6268**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0796	60.0796	0.0194	0.0000	60.5654
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0796**	**60.0796**	**0.0194**	**0.0000**	**60.5654**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0795	60.0795	0.0194	0.0000	60.5653
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0795**	**60.0795**	**0.0194**	**0.0000**	**60.5653**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SOC	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.5534	36.4804	6.6821	0.1722	5.3332	0.3703	5.7035	1.4859	0.3543	1.8202	0.0000	16,557.49 48	16,557.49 48	0.0652	2.6035	17,334.87 81
Unmitigated	0.5534	36.4804	6.6821	0.1722	5.3332	0.3703	5.7035	1.4869	0.3543	1.8202	0.0000	16,557.48 48	16,557.49 48	0.0652	2.6035	17,334.87 81

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,224.01	1,224.01	1,224.01	12,475,065	12,475,065
Total	1,224.01	1,224.01	1,224.01	12,475,065	12,475,065

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	14.70	6.60	28.00	0.00	0.00	100.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.517111	0.052324	0.170960	0.155671	0.027786	0.007423	0.013424	0.026160	0.000649	0.000313	0.023324	0.001439	0.003395
Unrefrigerated Warehouse-No Rail	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
NaturalGas Mitigated	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
NaturalGas Unmitigated	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

6.0 Area Detail

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Unmitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2704					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.5300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2794					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.6300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	**8.2645**	**1.5000e-004**	**0.0166**	**0.0000**		**6.0000e-005**	**6.0000e-005**		**6.0000e-005**	**6.0000e-005**	**0.0000**	**0.0323**	**0.0323**	**9.0000e-005**	**0.0000**	**0.0344**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	330.0596	13.1822	0.3145	753.3210
Unmitigated	330.0596	13.1822	0.3145	753.3210

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	332.9783	19.6785	0.0000	824.9395
Unmitigated	332.9783	19.6785	0.0000	824.9395

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

9.0 Operational Offroad

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Appendix B

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

Land-Use Design Elements and Mitigation Measures

The San Joaquin Valley Air Pollution Control District (District) has prepared the following Tables, listing mitigation measures to help land use agencies and developers identify ways to reduce air impacts associated with development projects occurring within the San Joaquin Valley Air Basin. Please note that this is not an exhaustive list, and both land use agencies and developers are encouraged to suggest new mitigation measures to add to the Tables.

Table 1: Mitigation Measures by Project Type

Project	Impact	Mitigation
General plan updates, large specific plans, new towns	Regional ozone impact, PM10 impact, CO hot spots, toxic air emissions, odors	• Adopt air quality element/general plan air quality policies/specific plan policies. • Discuss the feasibility of Voluntary Emission Reduction Agreements (VERAs) for certain types of projects. • Adopt air quality enhancing design guidelines or standards. • Designate pedestrian and transit oriented development areas on general and specific plan land use maps. • Adopt ordinance limiting wood burning appliances and fireplace installations. • Coordinate fugitive dust regulation enforcement with the SJVAPCD. • Adopt energy efficiency incentive programs. • Adopt local alternative fuels programs. • Coordinate location of land uses to separate odor generators and sensitive receptors. • Adopt operational zero or near-zero (0.02 g/bhp-hr NOx) emission Heavy Duty (HHD) fleets. • Adopt buffer distances associated with various types of common sources (e.g. distribution centers, chrome platers, gasoline dispensing facilities, etc.) based on the California Air Resources' (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*. Document can be found at: https://ww3.arb.ca.gov/ch/handbook.pdf. • Adopt best practices designed to address air pollution impacts as defined in the *CARB Freight Handbook*. Document can be found at: https://ww2.arb.ca.gov/resources/documents/concept-paper-freight-handbook. • Adopt the use of Construction Clean Fleets.

G-19

1

Land-Use Design Elements and Mitigation Measures

Table 1: Mitigation Measures by Project Type (continued)

Project	Impact	Mitigation
General plan amendments, small specific plans, and some zone changes	Potential regional Ozone impact, Cumulative impacts, CO hot spots, toxic air emissions, odors	• Apply general plan policies, local ordinances, and programs from above to the project site or adopt similar site specific programs. • Restrict residential traditional wood fireplaces, and incentivize natural gas fireplaces or inserts. • Encourage pedestrian/transit oriented project designs. • Discuss the feasibility of VERAs for certain types of projects. • Commit to on-site improvements, bikeways, transit infrastructure, and pedestrian enhancements. • Provide traffic flow improvements for areas impacted by development projects. • Adopt operational zero or near-zero (0.02 g/bhp-hr NOx) emission Heavy Duty (HHD) fleets. • Adopt buffer distances associated with various types of common sources (e.g. distribution centers, chrome platers, gasoline dispensing facilities, and etc.) based on the California Air Resources' (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective.* Document can be found at: https://ww3.arb.ca.gov/ch/handbook.pdf. • Adopt best practices designed to address air pollution impacts as defined in the *CARB Freight Handbook.* Document can be found at: https://ww2.arb.ca.gov/resources/documents/concept-paper-freight-handbook. • Adopt the use of Construction Clean Fleets.
Tentative maps, site plans, conditional use permits	Cumulative ozone impacts, CO, toxic air emissions, odors	• Apply general plan policies, local ordinances, and programs from above to the project site. • Encourage pedestrian/transit oriented site designs. • Provide on-site improvement: bikeways, transit infrastructure, pedestrian enhancements. • Contribute to Air Quality Mitigation Fee Fund. • Energy conservation measures above and beyond requirements. • Require residences to install natural gas fireplaces or inserts in lieu of traditional open hearth wood fireplaces. • Pay for fleet vehicle conversions to alternative fuels.

G-19 cont'd

2

Land-Use Design Elements and Mitigation Measures

Table 2: Regulation VIII Control Measures for Construction PM10 Emissions

Regulation VIII Control Measures - The following controls are required to be implemented at all construction sites
• All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover. • All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. • All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. • When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. • All operations shall remove the accumulation of mud or dirt from adjacent public streets at the end of each workday *(the use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden)*. • Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. • Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site. • An owner/operator of any site with 150 or more vehicle trips per day, or 20 or more vehicle trips per day by vehicles with three or more axles shall implement measures to prevent carryout and trackout.
Enhanced Control Measures. The following measures should be implemented at construction sites when required to mitigate significant PM10 impacts
• Post speed limit signs on unpaved roads limiting traffic to no more than 15 mph. • Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
Additional Control Measures. The following control measures are strongly encouraged at construction sites that are large in area, located near sensitive receptors, or for any other reason warranting additional emissions reductions
• Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site. • Construct and maintain wind barriers sufficient to limit visible dust to 20% opacity. • Suspend excavation and grading activity when winds exceed 20 mph. • Limit the size of areas subject to excavation, grading, and other construction activity occurring at any one time.

G-19 cont'd

3

Table 3: Construction Equipment Mitigation Measures

Emissions Source	Mitigation Measure
Heavy duty equipment (scrapers, graders, trenchers, earth movers, etc.)	• Use of alternative fueled or catalyst equipped diesel construction equipment. • Minimize idling time (e.g., 5 minute maximum). • Limit the hours of operation of heavy duty equipment and/or the amount of equipment in use. • Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). • Curtail construction during periods of high ambient pollutant concentrations. This may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways. • Implement activity management (e.g. rescheduling activities to reduce short-term impacts).

Table 4: Infrastructure-Based Mitigation Measures – Transit Enhancements

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide transit enhancing infrastructure that includes: transit shelters, benches, street lighting, route signs and displays, and bus turnouts	• Type of transit service (heavy rail, light rail, bus) – rail attracts more riders • Distance from home to transit station and transit station to work - ridership 2-4 times higher within ½ mile • Density of land use - higher densities provide greater ridership • Mix of uses at either end of transit trip - mixed use increases transit use • Pedestrian accessibility to transit system
Provide a Bus Rapid Transit (BRT) System	• Design features for high quality and cost effective transit service

G-19 cont'd

Table 5: Infrastructure-Based Mitigation Measures – Reducing Vehicle Miles Traveled (VMT)

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide park and ride lots and/or satellite telecommuting centers	• Distance to employment centers - long commute attracts park and ride users and telecommuters • Degree of congestion on routes to employment centers • Availability of high occupant vehicle (HOV) lanes, express transit, rail, rideshare incentives • Type of employers - information based jobs have higher telecommuting potential
Market Commute Trip Reduction Options	• Market strategies to reduce commute trips (e.g. new employee orientation of trip reduction and alternative mode options, event promotions, and publications)

4

Table 6: Infrastructure-Based Mitigation Measures – Pedestrian Enhancements

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide pedestrian enhancing infrastructure that includes: sidewalks and pedestrian paths, direct pedestrian connections, street trees to shade sidewalks, pedestrian safety designs/infrastructure, street furniture and artwork, street lighting, and/or pedestrian signalization and signage	• Degree of sidewalk/path coverage within walking distance. • Mixture of uses to attract pedestrians within walking distance. • Pedestrian circulation provides direct access (streets interconnected/pedestrian shortcuts). • Degree of street tree coverage along most used routes. • Street system designed to enhance pedestrian safety (traffic calming, signalization, separation from traffic, limited curb cuts, etc.). • Pedestrian routes provide safety from crime (eyes on the street, high activity levels, lack of gangs). • Walking routes to important destinations provide visual interest for pedestrians.

Table 7: Infrastructure-Based Mitigation Measures – Bicycle Enhancements

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide bicycle enhancing infrastructure that includes: bikeways, paths connecting to a bikeway system, secure bicycle parking, and/or employee lockers and showers	• Degree area within bicycling distance (5 miles max.) is served by interconnected bikeways. • Degree area within bicycling distance has wide paved shoulders and limited curb cuts. • Speed limits on routes to frequent destinations - low speed limits enhance cycling. • Presence of college or university within cycling distance. • Mixture of uses that attract bicyclists within cycling distance. • Availability of bicycle parking within cycling distance - communities with bike parking ordinance tend to have high availability.

G-19 cont'd

Table 8: Operational Mitigation Measures – Ridesharing

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Implement carpool/ vanpool program e.g., carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.	• Employer provides support measures such as carpool/vanpool subsidies, preferential parking, guaranteed ride home program, etc. • Coordinate with regional ridesharing organizations, e.g., Commute Connection, Central Valley Ridesharing, Kern Rideshare. • Multiple smaller worksites coordinate programs. • Limited parking supply and/or implementation of parking fees or parking cash-out.

5

Land-Use Design Elements and Mitigation Measures

Table 9: Operational Mitigation Measures – Employee Services

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide on-site shops and services for employees, such as cafeteria, bank/ ATM, dry cleaners, convenience market, etc.	• Sufficient number of employees at worksite, or cooperation among multiple worksites. • Safe, direct pedestrian access between employment and retail areas. • Jurisdiction provides density bonuses, other incentives to encourage mixed land uses.
Provide on-site child care, or contribute to offsite child care within walking distance	• Sufficient number of employees at worksite, or cooperation among multiple worksites.

Table 10: Operational Mitigation Measures – Shuttle Services

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Establish mid-day shuttle service from worksite to food service establishments and commercial areas	• Sufficient number of employees at worksite, or cooperation among multiple worksites. • Commercial area located within 3 miles. • Frequent, scheduled service during lunch hours. • Coordination among multiple employers, e.g., at business parks. • Provide commute shuttle to transit station, use same vehicle for mid-day shuttle.
Provide shuttle service to transit stations and multimodal centers	• Major transit facility/multimodal center located within 3 miles of project. • Transit use incentives for employees, e.g., on-site distribution of passes, subsidized transit passes, etc. • Frequent, scheduled service during peak commute periods • Coordination among multiple employers, e.g., at business parks. • Free or subsidized service. • Provide mid-day shuttle to commercial areas, use same vehicle for commute shuttle.

G-19 cont'd

6

Table 11: Operational Mitigation Measures – Parking Strategies

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide preferential parking (e.g. near building entrance, sheltered area, etc.) for carpool and vanpool vehicles	• Most effective if parking supply is limited and/or located far from building entrance.
Implement parking fees for single occupancy vehicle commuters	• Reduced or waived fees for carpools and vanpools. • Complemented by transit, ridesharing programs, other commute alternatives. • Revenues used to support commute alternatives. • Provisions in place to avoid off-site parking spillover.
Implement parking cash-out program for employees (i.e., non-driving employees receive transportation allowance equivalent to value of subsidized parking)	• Complemented by transit, ridesharing programs, other commute alternatives. • Implement at worksites not subject to state parking cash-out requirements. • Tax benefits if travel allowance offered as transit / ridesharing subsidy. • Provisions in place to avoid off-site parking spillover.

G-19 cont'd

Table 12: Operational Mitigation Measures – Transit Services

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Provide transit incentives	• Transit use incentives for employees, e.g., on-site distribution of passes, subsidized transit passes, etc. • Transit route maps and schedules posted at worksite. • Design and locate buildings to facilitate transit access, e.g., locate building entrances near transit stops, eliminate building setbacks, etc.

Table 13: Other Operational Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Implement compressed work week schedule (e.g. 4/40, 9/80)	• Consult with employees prior to program implementation.
Implement home-based telecommuting program	• Participation increased if employer provides/assists with provision of equipment (modem, computer, etc.). • Especially effective if employee commute trips are long.
Implement School Bus Program	• Restore or expand school bus service in project area and local community by working with school districts.

Land-Use Design Elements and Mitigation Measures

Table 13: Other Operational Mitigation Measures (continued)

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Unbundle Parking Costs from Property Costs	• Separate parking from property costs requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. • This removes the burden from those who do not wish to utilize a parking space.
Implement Market Price Public Parking (On Street)	• Implement pricing strategy for parking by pricing all central business district/employment center/retail center on street parking • It will be priced to encourage 'park once' behavior. • The benefit of this measure above that of paid parking at the project only is that it deters parking spillover from project-supplied parking to other public parking nearby, which undermine the vehicle miles traveled benefits of project pricing.
Integrate Affordable and Below Market Rate Housing	• Strategy encourages building a greater percentage of smaller units that allow a greater number of families to be accommodated on infill and transit-oriented development sites within a given footprint and height limit. • Lower income families tend to have a lower level of auto ownership, allowing buildings to be designed with less parking.
Implement NEV Network	• Create local 'light' vehicle network such as NEV networks • NEV are classified as 'low speed vehicles' and are electric powered and must conform to applicable federal automobile safety standards. • NEV offer an alternative to traditional vehicle trips and can legally be used on roadways with speed limits of 35 mph or less, ideal for short trips up to 30 miles in length. • Project will implement necessary infrastructure, including NEV parking, charging facilities, striping, and educational tools. • NEV routers will be implemented throughout the project and will double as bicycle routes.
Clean Operational Zero or Near-Zero Fleet	• Use of operational fleets that utilize the cleanest available HHD truck technologies, including near-zero (0.02 g/bhp-hr NOx) technologies as feasible. • Use of on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc. from development projects to utilize zero-emissions technologies as feasible.

G-19 cont'd

Table 13: Other Operational Mitigation Measures (continued)

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Buffer Distances	• Use of recommended buffer distances associated with various types of common sources (e.g. distribution centers, chrome platers, gasoline dispensing facilities, and etc.) as identified in the California Air Board Resources' (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*. Document can be found at: https://ww3.arb.ca.gov/ch/handbook.pdf.
Best Freight Practices	• Use of best practices which apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities as identified in the CARB *Freight Handbook*. Document can be found at: https://ww2.arb.ca.gov/resources/documents/concept-paper-freight-handbook.

Table 14: Area Source Mitigation Measures

Mitigation Measures	Supporting Factors to Enhance Effectiveness
Residential Water Heaters	• Use solar or low-emission water heaters (beyond Rule 4902). • Use central water heaters.
Residential Energy Efficiency	• Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs. • Increase wall and attic insulation beyond Title 24 requirements.
Commercial Water Heaters	• Use solar or low-emission water heaters. • Use central water heating systems.
Commercial Energy Efficiency	• Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs. • Increase wall and attic insulation beyond Title 24 requirements.
Industrial Heating	• Orient buildings to take advantage of solar heating and natural cooling and use passive solar designs.
Landscape Maintenance	• Provide electric maintenance equipment.
Residential Heating	• Eliminate or limit the amount of traditional fireplaces installed (i.e. natural gas fireplaces/inserts or at least EPA certified wood stoves or inserts instead of open hearth fireplaces).

G-19 cont'd

Land-Use Design Elements and Mitigation Measures

Additional Mitigation Measures

1. Increase residential density.
2. Designate a portion of residential units as deed-restricted below-market-rate (BMR) housing; Affordable Housing.
3. Provide Class I and Class II bicycle parking/storage facilities on-site. Bicycle parking facilities should be near destination points and easy to find. At least one bicycle parking space for every 20 vehicle parking spaces.
4. Provide shower and locker facilities to encourage employees to bike and/or walk to work, typically one shower and three lockers for every 25 employees.
5. Provide Class I bicycle parking at apartment complexes or condos without garages.
6. Install Class I or II bike lanes on arterial/collector streets, or where a suitable route exists.
7. Provide building access and paths which are physically separated from street parking lot traffic and that eliminate physical barriers such as walls, berms, landscaping and slopes that impede the use of pedestrians, bicycle facilities, or public transportation vehicles.
8. Provide continuous sidewalks separated from the roadway by landscaping and on-street parking.
9. Provide on and off-site pedestrian facility improvements such as trails linking them to designated pedestrian commuting routes and/or on-site overpasses and wider sidewalks.
10. Link cul-de-sacs and dead-end streets to encourage pedestrian and bicycle travel.
11. Provide traffic reduction modifications to project roads, such as: narrower streets, speed platforms, bulb-outs and intersection modifications designed to reduce vehicle speeds and to encourage pedestrian and bicycle travel.
12. Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.
13. Provide pedestrian access between bus service and major transportation points and to destination points within the project.
14. Provide a display case or kiosk displaying transportation information in a prominent area accessible to employees, residents, or visitors.

G-19 cont'd

10

Land-Use Design Elements and Mitigation Measures

15. Display Bike Route Maps, Bus Schedules, and any other transportation information such as carpooling, car sharing.

16. Utilize project design models by the Local Government Commission (LGC) such as: street block patterns that form an interconnected grid, short block faces, numerous alleys and narrow streets (https://www.lgc.org/resources/community-design)

17. Develop and implement parking pricing strategies, such as charging parking lot fees to low occupancy (single occupant vehicles) vehicles.

18. Provide preferential parking spaces near the entrance of buildings for those who carpool/vanpool/rideshare and provide signage.

19. Install efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units beyond Title 24 requirements (see Title 24, Part 6, Energy Efficiency Standards for Residential and Nonresidential Buildings: http://www.energy.ca.gov/title24)

20. Improve the thermal integrity/efficiency of buildings, and reduce the thermal load with automated and timed temperature controls or occupant sensors.

21. Incorporate solar power systems as an emission reduction strategy.

22. Install high efficiency Energy Star heating or ground source heat pump.

23. Install energy efficient interior lighting.

24. Install built-in energy efficient appliances.

25. Install electrical outlets on the exterior walls of both the front and back of residences or all commercial buildings to promote the use of electric landscape maintenance equipment.

26. Install electric vehicle recharging stations in parking garages and parking lots.

27. Install a gas outlet for use with outdoor cooking appliances, and in any proposed fireplaces, including outdoor recreational fireplaces or pits.

28. Install HEPA (High Efficiency Particulate Air) filters.

29. Install "whole-house" or "fresh-air" ventilation systems.

30. Reduce the use of Wood Burning Fireplaces and/or Woodstoves beyond that required by District Rule 4901.

31. Provide guaranteed ride home for employees.

11

G-19 cont'd

Land-Use Design Elements and Mitigation Measures

32. Provide carpool support system.

33. Implement a rideshare program.

34. Provide incentives to employees to carpool/vanpool, take public transportation, telecommute, walk, bike, etc.

35. Provide transit pass subsidy (100%) and/or commute alternative allowances.

36. Provide an employer subsidized shuttle service to connect to existing transit sites.

37. Implement a lunchtime shuttle to reduce single occupant vehicle trips.

38. Provide electric shuttle or minibus service to transit stops.

39. Provide free transfers between all shuttles and transit.

40. Operation of a shuttle bus to shopping, health care, public services sites, etc. to reduce automobile use.

G-19 cont'd

41. Implement alternative work schedules such as compressed workweek schedules where weekly work hours are compressed into fewer than five days. Examples of these options are: 9/80, 4/40, 3/36.

42. Project provides and/or requires use of electric maintenance equipment; including, but not limited to electric lawn mowers, electric leaf blowers, etc.

43. Prohibit gas powered landscape maintenance equipment within developments.

44. Replace diesel fleet with alternative fuel engine technology and infrastructure.

45. Retrofit existing equipment to reduce emissions using methods such as particulate filters, oxidation catalysts, or other approved technologies.

46. Adopt a Vehicle Idling Policy requiring all vehicles under company control to adhere to a 5 minute idling policy.

47. Add-on control devices, e.g., particulate traps, catalytic oxidizers on construction equipment.

48. Repower/Retrofit heavy-duty diesel fleet with cleaner diesel engine technology and/or diesel particulate filter after-treatment technology.

49. Replace auxiliary power units with cleaner engine technology, alternative fuels, or require electric connection while at loading dock.

12

Land-Use Design Elements and Mitigation Measures

50. Replace diesel fleet vehicles with cleaner fueled low emission vehicles (i.e. school buses, buses, on- and off- road heavy duty vehicles, lighter duty trucks and passenger vehicles).

51. Improve destination accessibility such as locating the project within 12 miles from the downtown or a job center.

52. Use of a "Construction Clean Fleet" that will reduce construction emissions by 20% for oxides of nitrogen (NOx) and 45% for particulate matter of 10 microns or less in size (PM10) from the statewide average as estimated by the Air Resource Board ARB. A Construction Clean Fleet for a project includes all the pieces of construction equipment that are greater than 50 horse power and generate emissions from the use of an internal combustion engine related to construction activity. On average a mix of construction fleet with engine model years five (5) years or newer from the current calendar year would likely achieve the required reduction for NOx and PM10. Please note, the construction start year, fleet engine year mix, equipment type, and the number of hours used by each piece of equipment all can affect the ability to achieve the required reductions.

G-19 cont'd

13

Appendix C

CALIFORNIA
SUSTAINABLE FREIGHT INITIATIVE

Concept Paper for the Freight Handbook

Release date: December 12, 2019
Comments due: February 28, 2020

CALIFORNIA AIR RESOURCES BOARD

Disclaimer

This Concept Paper has been prepared by the staff of the California Air Resources Board. Publication does not signify that the contents reflect the views and policies of the California Air Resources Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

This page deliberately left blank.

Concept Paper for the Freight Handbook

Document Availability

Electronic copies of this document and related materials can be found at: https://ww2.arb.ca.gov/our-work/programs/sustainable-freight-transport. Alternatively, paper copies may be obtained from our Public Information Office, 1001 I Street, 1st Floor, Visitors and Environmental Services Center, Sacramento, California, 95814, (916) 322-2990.

Versiones en Español de este documento y materiales relacionados estarán disponibles en: https://ww2.arb.ca.gov/our-work/programs/sustainable-freight-transport

Special Accommodation Request

If you need this document in an alternative format (i.e. Braille, large print) or another language, please contact Christopher Garcia at (916) 322-8382, or freight@arb.ca.gov G-20

Para solicitar estas comodidades especiales o necesidades de otro idioma, favor de contactar a Stephen Cutts al (916) 323-1603 o freight@arb.ca.gov.

Contacts

To receive electronic notices of meetings and available materials, please sign up for the Sustainable Freight Transport Initiative list serve at: Sustainable Freight Transport Initiative List Serve

For questions, please contact: Mr. Andre Freeman, Manager
Freight Policy Section
Freight Transportation Branch
Transportation and Toxics Division
(916) 322-8382

Comments

We welcome written comments sent to: freight@arb.ca.gov. Please provide any written comments on this Concept Paper by February 28, 2020.

This page deliberately left blank

TABLE OF CONTENTS

INTRODUCTION I

CONCEPTS FOR THE FREIGHT HANDBOOK 1

I. CONTEXT FOR ACTION 1

A. Roles and Responsibilities 2
B. Need to Accelerate Air Quality Progress 3
1. Near-Source Health Risks 5
2. More Protective Air Quality Standards 5
3. Ambitious Climate Change Targets 6
C. State Vision for Sustainable Freight 6

II. HOW THE FREIGHT HANDBOOK CAN INFORM LAND USE PLANNING AND DEVELOPMENT DECISIONS 7

III. ADDRESSING THREE LAND USE SCENARIOS FOR FREIGHT FACILITIES 7

A. New and Expanding Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors 7
1. Preliminary Distances for Establishing Transition Zones 9
2. Proposed Approach for Determining Transition Zone Distances 10
B. Existing Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors 14
C. New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors near Existing Freight Facilities 15

IV. SUMMARY OF POTENTIAL PRACTICES 15

A. Broad-Based Practices 16
B. Priority Project-Specific Practices 16
C. Additional Practices and Mitigation 16
D. Resources for Development of Potential Practices 16

CONCEPTS FOR WAREHOUSE FACILITIES 31

LIST OF RESOURCE DOCUMENTS 48

LIST OF TABLES

Table 1. Potential Practices for Siting New or Expanded Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors ... 8

Table 2. Illustration of Transition Zone Distances Around New or Expanded Freight Facilities ... 11

Table 3. CARB Activities Supporting California's Efforts to Reduce Impacts from Existing Freight Facilities Near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors ... 14

Table 4. Potential Practices for New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors Near Existing Freight Facilities ... 15

Table 5. Summary of Potential Practices to Minimize Community Health Impacts from Freight Facilities ... 19

Table 6. Summary of Potential Practices at Warehouses and Distribution Centers ... 33

LIST OF FIGURES

Figure 1. Freight Emission Inventory Statewide for 2000 and 2035 ... 4

Figure 2. Normalized Downwind Diesel PM Concentration and Associated 30-Year Cancer Risk by Distance ... 13

INTRODUCTION

To support public review, discussion, and feedback, this Concept Paper shares the California Air Resources Board (CARB or Board) staff's preliminary thoughts for the Freight Handbook. CARB is developing a Freight Handbook as an informational resource for community advocates, local decision makers, and freight facility developers, owners, and operators. The document will frame efforts to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities.

In recognition that specific communities in California are heavily impacted by air pollution, the California Legislature passed Assembly Bill 617 (AB 617) to reduce emissions directly from sources contributing to cumulative exposure burdens within and directly surrounding such communities. To implement AB 617, CARB established the Community Air Protection Program. In September 2018, the Board selected a set of initial communities to create Community Emissions Reduction Plans (CERPs), and will annually consider the selection of additional impacted communities. Freight facilities are one of the primary areas of concern in a number of communities currently developing CERPs. New actions proposed by these communities include increased engagement with local land use and transportation agencies to help minimize impacts from freight activities. Many of the actions and ideas summarized in this Concept Paper build off and support these AB 617 activities.

G-20 cont'd

Prior to engaging in the AB 617 process, CARB initiated additional work on freight activities, through increased reviews of California Environmental Quality Act (CEQA) documents for proposed facilities, creation of the Sustainable Freight: Pathways to Zero and Near-Zero Emissions (April 2015) document, and development of the multi-agency California Sustainable Freight Action Plan (July 2016). Also, CARB staff have met frequently with residents and advocates for communities impacted by air pollution from freight operations and heard a consistent request for guidance that identifies possible local actions that could minimize freight facility emissions and related community exposure to air pollution.

The Governor's 2019 Executive Order N-19-19 furthered the State's commitment to transition towards a healthier, sustainable, and more inclusive economy. This includes addressing direct tailpipe emissions from diesel equipment and vehicles through strong public investments. California has prioritized billions of dollars in annual transportation spending for the construction, operation, and maintenance of infrastructure to help reverse the trend of increased fuel consumption and decrease vehicle miles traveled. The State also continues its effort to accelerate zero-emission vehicle sales through incentive programs, grants, and regulatory actions.

This Concept Paper supports the relevant freight-related actions proposed by communities developing CERPs through the Community Air Protection Program, ideas we've heard from communities, the recommendations we've included in our CEQA comment letters on proposed freight facilities, and other existing resources. This Concept Paper is intended to aid and encourage public participation to help shape the Freight Handbook. CARB staff will continue to collaborate with communities,

i

agencies, industry and other stakeholders through a public process, and will integrate public feedback into the creation a Freight Handbook that will provide a detailed discussion of the concepts introduced in this Concept Paper. This will include framing how practices may apply in a given scenario and the roles that local government, freight facility developers, owners, and operators, and the public have in land use planning and development review processes.

CARB is seeking robust engagement from community, public, and private industry participants. We encourage you to share your thoughts and expertise in this effort. In addition to any comments you would like to provide, CARB staff can greatly benefit from focused comments that:

G-20 cont'd

- Suggest other land use scenarios that should be highlighted;
- Identify implementation challenges for practices listed in Tables 5 and 6;
- Propose other practices that can be undertaken to support the goals of the Freight Handbook;
- Clearly identify the specific issues on which you are commenting and provide a citation;
- Explain why you agree or disagree with a proposed practice. Where you disagree, please suggest an alternative and consider potential trade-offs as well as opposing views;
- Describe your assumptions and support assertions with factual information by providing technical data, or specific examples, where possible.

CONCEPTS FOR THE FREIGHT HANDBOOK

I. Context for Action

This Concept Paper introduces preliminary thoughts for a Freight Handbook. This Concept Paper serves as a starting point for local, regional, and State discussions about freight facility siting, design, construction, and operational decisions that can minimize near-source exposure to air pollution from new, existing, and expanding freight facilities, and promote clean, healthy air for existing and future Californians and its millions of annual visitors. CARB's intent is to encourage land use planners and local officials, community advocates, and freight facility developers, owners, and operators to integrate emission reduction practices and information about freight facilities into local plans and ordinances, facility-based decisions, and community advocacy.

California's freight transport system is vital to our State economy. California is the nation's largest gateway for international trade and domestic commerce, with an interconnected system of ports, railroads, highways, and roads that allow freight from around the world to move throughout the State and nation. This system is responsible for approximately one-third of the State's economic production, with jobs from freight-dependent industries accounting for over $700 billion in revenue and over 5 million jobs. California's vast transportation system connects the estimated nearly 40 million residents and supports a vibrant economy with nearly $3 trillion in annual gross domestic product. The trucks and equipment that congregate at freight facilities are essential components of the statewide freight system which transports and delivers food, household products, electronics, vehicles, toys, and medicines to the consumer market, both in California and the country. Traditional routes of moving freight face increasing competition from across the globe, and California's system must anticipate and stay ahead of these changes. As California's freight transport system continues to grow under pressure to serve our growing population and satisfy dynamic market demands, other locations in the United States and across the world are competing for this economic activity.

G-20 cont'd

Although the freight system plays an important role in everyday life, communities near freight facilities are burdened by air pollution—specifically toxic air contaminants like diesel particulate matter in the form of exhaust—from the construction and operational activities at freight facilities. Where freight movement increases from new and existing facilities over time, communities may experience increased exposure to higher emissions of toxic and criteria air pollutants. Increased exposure to these emissions have public health implications such as increased risk of premature death, lung cancer, heart and lung diseases, and asthma.

To achieve its air quality, climate, efficiency and economic competitiveness goals, California must transition to a more efficient, zero-emission transportation system for both passenger and freight movement. This is a complex and challenging undertaking. Meeting the State's goals will require the combined efforts of public and

1

private stakeholders taking action and investing resources across a wide range of sectors that include: energy and fuels, advanced technology, housing and land use, infrastructure, health, the environment, and the economy. Industries operating in California have already made substantial investments in cleaner diesel fuels, vehicles and equipment, reducing diesel particulate matter and other pollutants. Progress is being made in many of these sectors in the form of State regulation, policy and funding, local actions, private innovation, investments supporting communities and exploring new technologies, and more.

The Concept Paper for the Freight Handbook will initiate a new dialogue to identify a set of practices that can be implemented to support flexibility, efficiency, and business practices through policies and programs that support the economy, while working with industry to mitigate the environmental and health inequities certain communities experience due to emissions from freight activities.

A. Roles and Responsibilities

A more efficient, zero and near-zero emission modern freight system will demand not only new vehicles, equipment, and fuels, but also new transportation infrastructure, communications, and industry operating practices. California will need workers trained to build, maintain, and operate this advanced equipment and communications systems. To help fund these efforts, California's logistics industry must remain profitable in the face of increasing competition from other North American seaports and supply chains. The ability to readily adapt to changing trends and expand operations is key to improving the competitiveness of the system. Community acceptance of industry expansion often depends on the prospects for new local jobs, clean air, and safe operations. G-20 cont'd

The transition to this modern freight system relies on public and private funds invested in infrastructure projects, vehicle and equipment purchases, technological applications, and system management approaches. It also requires the new regulatory and incentive programs underway to spur zero-emission and other clean technology development and deployment. To ensure effective implementation of these actions, many groups must come together to successfully achieve the needs of California's communities from public health, economic, and environmental standpoints.

Local governments that make land use decisions related to freight facilities are on the forefront of the transition to zero-emission operations. They must carefully consider a range of sometimes competing priorities for economic development and jobs, the critical need for affordable housing and infill development, public health, and quality of life for community residents. The owners and operators of new or expanded freight facilities play key roles in leading this transition and are positioned to make cost-effective investments in infrastructure while designing and building projects. Community residents and their advocates need a greater voice in freight facility siting, design, construction, and operation choices so the end result supports or enhances their environment, safety, and opportunities for employment.

2

B. Need to Accelerate Air Quality Progress

To control and reduce emissions, CARB gathers and analyzes data for updating its mobile source emissions inventories.[1] The inventories assess population, activities, and emissions from mobile sources operating in and around the State. Periodically, these inventories are updated to support the latest air quality plans and regulations. CARB compiles emissions data for on- and off-road mobile sources including off-shore emissions to prepare a statewide freight inventory.

The emissions from the heavy equipment that transports freight in California contributes to elevated ambient levels of criteria pollutants such as fine particulate matter and ozone, as well as localized health impacts near freight facilities. Freight transport accounts for about half of toxic diesel particulate matter (diesel PM) and emissions of nitrogen oxides that form ozone and fine particulate matter in the atmosphere, and six percent of the greenhouse gas emissions in California. These numbers include emissions from trucks, ships, locomotives, aircraft (cargo portion), harbor craft, and all types of equipment used to move freight across the State.

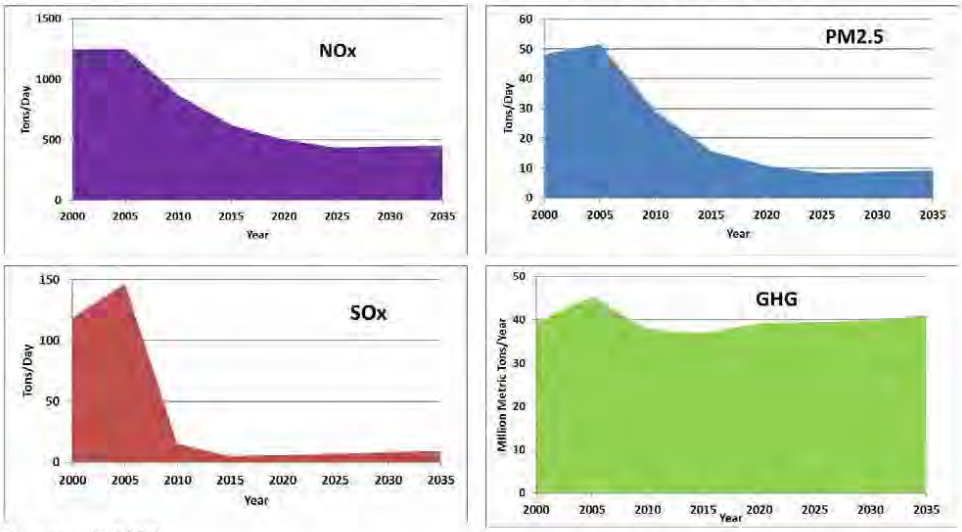
G-20 cont'd

Figure 1 summarizes freight emissions statewide from CARB 2000 inventories projected to 2035. As illustrated in the graphs, CARB strategies for reducing criteria pollutants and greenhouse gas emissions have been effective. However, the State must continue to implement programs and develop new strategies to achieve its air quality goals.

[1] CARB. See, Mobile Source Emissions Inventory.

3

Figure 1. Freight Emission Inventory Statewide for 2000 and 2035



Source: CARB

G-20 cont'd

Together with our local, regional, and state government partners, we have accelerated extensive changes towards cleaner technologies across the State. Truck owners, ocean carriers, terminal operators, and railroads have made substantial investments to transition their diesel freight equipment to cleaner models, while refineries retooled to produce cleaner diesel fuels. We are seeing the real-world benefits of those investments resulting in measurably cleaner air in communities near seaports and rail yards over the last decade. For example, these combined actions have cut toxic diesel PM at the State's largest seaports by more than 80 percent over the last decade.

However, California must accelerate implementation of air quality programs for the protection of public health. The State must continue to develop policies and make investments in technologies that result in greater emission reductions to achieve its air quality and public health goals. To that end, California is pursuing both incentive and regulatory approaches to reduce the high near-source cancer risk from freight facilities to community members, increase the sustainability of the freight system to meet targets in the State Implementation Plan, and reshape the freight system to achieve our long-term climate goals.

This need is especially acute in specific communities that are exposed to high cumulative levels of air pollution. To reduce this burden, and in response to Assembly Bill 617 (C. Garcia, Chapter 136, Statutes of 2017), CARB established the Community Air Protection Program. Through this program, the Board annually considers for selection impacted communities to collaborate with to develop and implement new locally-focused Community Emissions Reduction Plans (CERPs). Freight facilities are

4

one of the primary areas of concern in a number of communities currently developing CERPs due to their substantial toxic and criteria air pollution emissions. CARB staff have already begun working closely with local air districts, community groups, community members, environmental organizations, and regulated industries to identify emission reduction practices for freight facilities within the affected communities.

1. Near-Source Health Risks

Despite substantial progress over the last decade, the ongoing use of diesel-fueled trucks and equipment continue to impact communities near major freight facilities. The diesel-fueled equipment operating in and around freight facilities is the most significant source of diesel PM, a toxic air contaminant that can substantially increase the risk of developing cancer and other health problems such as increased respiratory illnesses, risk of heart disease, and premature death. Exposure to diesel PM is a health hazard to people of all ages, but particularly to children whose lungs are still developing and the elderly, who may have other serious health problems. The diesel PM emissions from freight facilities impact communities located adjacent to those operations, as well as people living and working miles away.

In the last decade, advances in science have shown that early-life exposures to air toxics contribute to an increased lifetime risk of developing cancer, or other adverse health effects, compared to exposures that occur in adulthood. This research has shown that children and infants are more sensitive to the harmful effects of exposure to air toxics, like those emitted from freight equipment, than we previously understood.

G-20 cont'd

In March 2015, the California Office of Environmental Health Hazard Assessment released an update to its recommended methodology for conducting health risk assessments in California. The methodology addresses this greater sensitivity and incorporates the most recent data on childhood and adult exposure to air toxics. Health risk assessments conducted by or available to CARB staff show the potential for elevated exposures to diesel PM in communities near freight facilities.

2. More Protective Air Quality Standards

Current control programs are reducing emissions, but the State Implementation Plans required by federal law to demonstrate our path to attain ozone and fine particle ambient air quality standards compel significant additional emission reductions in the South Coast and San Joaquin Valley. At the same time, these two regions, and the San Francisco Bay Area, are experiencing tremendous growth in warehousing and distribution facilities due to e-commerce. The growth in the development of these facilities may increase air pollution from construction and their day-to-day operational activities.

5

3. Ambitious Climate Change Targets

New efforts in response to climate change are ramping up the pressure for further progress in the 2030 and 2050 timeframes to reduce greenhouse gases and short-lived climate pollutants, like black carbon from diesel-fueled equipment. California has set aggressive targets for reducing greenhouse gas emissions by 40 percent below 1990 levels by 2030, and then 80 percent below 1990 levels by 2050. California also committed to achieve zero-carbon electricity by 2045. Without action, greenhouse gases from the freight sector are projected to grow, driven by increases from freight movement. To curb emissions, the freight industry should accelerate efforts to integrate zero-emission, renewable energy technologies into facility operations to cut petroleum use.

C. State Vision for Sustainable Freight

In 2016, six State agencies, departments, and offices developed the California Sustainable Freight Action Plan. The plan identified State policies, programs, and investments to ensure progress toward a sustainable freight system.

G-20 cont'd



Vision for a Sustainable Freight Transport System

Utilize a partnership of federal, State, regional, local, community, and industry stakeholders to move freight in California on a modern, safe, integrated, and resilient system that continues to support California's economy, jobs, and healthy, livable communities. Transporting freight reliably and efficiently by zero-emission equipment everywhere feasible, and near-zero emission equipment powered by clean, low-carbon renewable fuels everywhere else.

As part of that work, the State is dedicating considerable resources to modernize the freight transport system with a priority to integrate zero and near-zero emission technologies. These and other technologies have the potential to greatly reduce impacts from freight activities on nearby communities and regional air quality, as well as climate change. The benefits of reducing diesel PM emissions and near-source exposure, protecting public health, and achieving systematic reductions in climate pollution cannot be overstated.

6

II. How the Freight Handbook Can Inform Land Use Planning and Development Decisions

The Freight Handbook will describe practices that reduce diesel PM emissions and near-source exposure, nitrogen oxides, greenhouses gases, and black carbon. We identified potential practices for inclusion in this Concept Paper because they have the potential to increase community participation and minimize community air pollution impacts from freight facilities.

III. Addressing Three Land Use Scenarios for Freight Facilities

This section provides an overview of staff's approach to frame the Freight Handbook. For each of the three land use scenarios, we identify potential practices that local government, freight facility developers, owners, and operators could implement with greater community involvement.

The scenarios are:

A. New and expanding freight facilities near existing residences, schools, health care facilities, and other sensitive receptors

B. Existing freight facilities near existing residences, schools, health care facilities, and other sensitive receptors

C. New residences, schools, health care facilities, and other sensitive receptors near existing freight facilities

G-20 cont'd

A. New and Expanding Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

In response to changing market demands, new freight facilities are being built and many existing freight facilities are expanding physical footprints or increasing operational activities, particularly in the warehousing and distribution center sector. As more freight facilities are built, air pollutant emissions may increase from construction and operational activities over the baseline conditions on a development site. The Freight Handbook will describe practices that can minimize air pollutant emissions and community exposure. Table 1 summarizes some key potential practices for siting new or expanded freight facilities near existing residences, schools, health care facilities, and other sensitive receptors.

7

Table 1. Potential Practices for Siting New or Expanded Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

1. Maximize operation of zero-emission trucks and equipment
2. Provide a "transition zone" between new or expanded freight facility and existing residences, schools, health care facilities, and other sensitive receptors
3. Identify and implement exposure reduction approaches (air filters, trees, and walls)
4. Develop and implement truck routes and safety programs

Staff is also identifying potential practices for local governments to consider when preparing or updating land use documents and zoning codes. These include planning documents that identify impacted areas and zoning that supports practices that new and expanding freight facility projects can implement.

G-20 cont'd

Practices for freight facility developers could include use of the lowest emitting construction equipment, routing truck hauling and delivery activities away from neighbors, and locating on-site operations to minimize the air pollution, safety, and nuisance impacts on neighbors. Once built, freight facility owners and operators can utilize zero-emission trucks and equipment on-site. Where zero-emission operations are not yet feasible, owners and operators can use and allow on site near-zero emission technologies utilizing renewable energy, with a plan for transitioning to zero in the future. Owners and operators can also install vegetated barriers, contribute to funding programs for installing and maintaining adequate air filtration on buildings that house sensitive receptors, designate truck delivery routes, and appropriately locate truck access points and loading areas.

Potential community advocacy practices include engagement in land use planning and development review processes, monitoring facility activities, and reporting any concerns. This may include attending community workshops, public events and hearings, and monitoring implementation efforts.

8

1. Preliminary Distances for Establishing Transition Zones

As described in prior CARB documents, studies show that public exposure to air pollution can be substantially elevated near freight facilities with diesel-fueled vehicles and equipment. And that same pollution decreases sharply with distance from the source because of how particles move and deposit on surfaces. For that reason, CARB will continue to encourage space that separates new or expanded freight facilities served by diesel and other combustion vehicles and equipment from sensitive receptors.



CARB's 2005 Air Quality and Land Use Handbook discussed siting new sensitive receptors a minimum distance away from existing air pollution sources of all types. This Concept Paper discusses siting new or expanded freight facilities away from existing residences, schools, health care facilities, and other sensitive receptors.

G-20 cont'd

In this Concept Paper, we refer to this space as a "transition zone" to separate land use zones for new or expanded freight facilities away from sensitive land uses such as residences, schools, health care facilities, and other sensitive receptors. Transition zones are important because increasing the distance between an emission source and sensitive receptor is a particularly effective means of protecting vulnerable people (children, the elderly, and medically compromised individuals) from exposure to air pollution from freight facilities. Transition zones might contain green space, or revenue-producing uses like commercial office buildings or retail. The key is to find uses that would naturally limit the duration of time that people are exposed to air pollution from the nearby freight facility.

We plan to identify minimum transition zone distances for new and expanded freight facilities to protect the health of communities near these facilities. Through a collaborative public process, CARB will work with community advocates, local decision makers, and freight facility owners, operators, and developers to design and evaluate the technical analysis needed to determine appropriate distances. We encourage you to share your thoughts and expertise in this effort.

Transition zone recommendations in the Freight Handbook will be intended to provide non-binding guidance to local land use decision makers regarding zoning, permitting,

9

and project approval actions for new or expanded freight facilities. They should not be used as a substitute for site-specific assessments of emissions and health impacts for proposed freight facilities, including those analyses required or recommended as part of federal or State environmental review processes. Additionally, they should not be used as an indicator of a safe level of exposure to emissions from freight facilities, as health risks may exist beyond distances identified.

Freight facilities are often strategically placed in response to the logistic chain or purpose they serve; therefore, each freight facility often has its own activity profile and configuration. Community exposure to diesel PM can vary depending on the proximity to, and the geographic location of, a freight facility.

Regardless of the size of a new freight facility or its operational characteristics, we strongly recommend that new freight facilities be designed and built for eventual full zero-emission operation. Multiple types and models of zero-emission or near zero-emission operation freight vehicles and equipment are available today. Many others are in development or demonstration phases. To support the goal of a zero-emission freight system, CARB is pursuing an ambitious agenda to require vehicles, equipment, and facilities to make the transition to zero-emission options. Building a new freight facility with the infrastructure to power this equipment is more cost effective and less disruptive to operations than retrofitting a facility later.

G-20 cont'd

Even if a new or expanded freight facility is sited consistent with an identified transition zone, the facility should still reduce its air pollutant emissions and mitigate impacts to the maximum extent possible. This is critical to continue California's progress to reduce local air toxics emissions and near-source exposure, achieving and maintaining regional air quality goals, and combatting climate change.

Lastly, a facility would be subject to local ordinances that address other potential impacts such as noise, vibration, light pollution, and water pollution. The local agency would review a proposed freight facility to ensure compliance with applicable standards, rules, and regulations including adequate distances to avoid or reduce an impact.

2. Proposed Approach for Determining Transition Zone Distances

The practices to be provided in the Freight Handbook are intended to reduce air pollution at freight facilities. But the transition zone concept specifically focuses on the proximity of new diesel vehicles and equipment to people, and the associated near-source cancer risks to community members. This section discusses the data and an approach that could be used to develop the distances for the transition zones.

The transition zone distances for new or expanded freight facilities with diesel vehicles or equipment would be based on both technical analysis and discussions within a collaborative public process. The intent of the analysis would be to evaluate the

general diesel PM-related exposure trends for freight facilities based on current practices and pollution control technology. The public discussions would help inform the selection of distances, based on a review of the technical analysis. The technical analysis and discussion would not be intended to identify a distance that should be interpreted to correspond to a safe level of exposure to diesel PM. For all facility types using diesel equipment that we have previously evaluated, the analysis shows that excess cancer risk remains unless zero-emission technology is used. This is important because there is currently no safe level identified for exposure to diesel exhaust.

A freight facility with zero on-site emissions does not present the same issues with near-source cancer risk or other localized health impacts to sensitive receptors as a facility with combustion-related air pollution. However, we are aware that there may be concerns from residents about other factors (e.g. noise, vibration, odor, glare, etc.) associated with freight operations that support a transition zone even around a zero-emission facility. Here, we suggest 500 feet from existing residences, schools, health care facilities, or other sensitive receptors as a potential distance.

G-20 cont'd

We do not propose 500 feet is appropriate distance for a zero-emission freight facility in every instance. Rather, we suggest 500 feet in order to avoid implying zero-emission facilities would not result in any potential impact. We are seeking input to determine an appropriate transition zone for freight facilities with zero on-site emissions.

Table 2 serves to illustrate how CARB staff proposes to display minimum transition zone distances for new and expanded freight facilities. The top value of each range (X and Y) will be the minimum transition zone distance for freight facilities with diesel vehicles and equipment on site, while the 500 foot transition zone assumes zero on-site emissions.

Table 2. Illustration of Transition Zone Distances Around New or Expanded Freight Facilities

Facility Type	Preliminary Distance from Facility
Warehouse/ Distribution Centers > [TBD] square feet	500 feet to X
Cold Storage Warehouses	500 feet to Y

Source: CARB

11

a. Analytical Approach

An analytical approach could focus on evaluating dispersion modeling results from published Health Risk Assessment (HRA) studies or modeling of a representative facility and the associated cancer risk estimates[2]. Through a collaborative public process, we could identify representative facility characteristics or a representative study for a high-activity freight facility that includes all diesel vehicles and equipment typically operating at that freight facility. This approach would provide the most appropriate and health-protective analysis for this purpose.

The projected ground-level concentrations of diesel PM in the downwind direction for each selected freight facility study could be extracted, with adjustments if needed based on emission changes, and updated estimates of the associated potential excess cancer risks would be generated.

b. Emissions, Exposure, and Cancer Risk

G-20 cont'd

Generally, emissions from a facility depend on the emission level of the equipment, and the number and activity level of the equipment. Since existing studies focus on facility operations and emissions from different years, the facility emissions from different HRAs could be updated to the same reference year, without changing the original activity levels to develop a consistent baseline for a transition zone. We could also assume that the physical location of emission sources would not change from the original analyses. The intent of such an analysis would be to provide a series of reference points that illustrate the relationship between cancer risks, air pollutant concentrations, and distance.

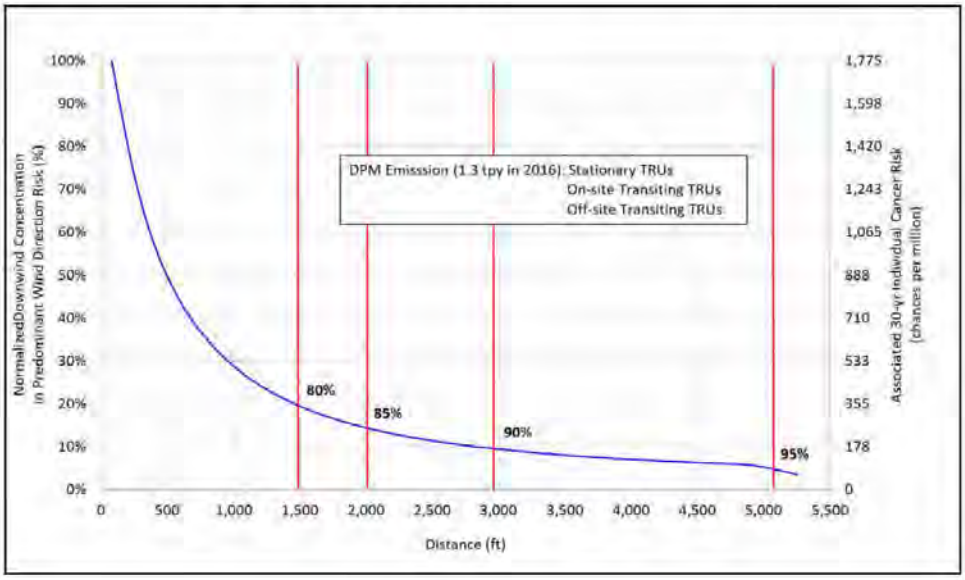
The result of such an analysis would be a series of graphs that would include reference points where the diesel PM concentration and cancer risk decrease, compared to the highest near-source risk level to community members (i.e. the "maximum exposed individual").

For example, Figure 2 illustrates a preliminary analysis of normalized diesel PM concentrations for a high-activity cold-storage warehouse. The red lines in the graph represent the distances downwind from the highest off-site risk value where the diesel PM concentration (left axis) and the associated cancer risks (right axis) are reduced by 80, 85, 90, and 95 percent.

[2] Using the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hotspots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance)

12

Figure 2. Normalized Downwind Diesel PM Concentration and Associated 30-Year Cancer Risk by Distance



G-20 cont'd

c. Factors in Identifying Distances

To identify a health-protective distance for the transition zones, CARB staff could provide modeling expertise and scientific judgement, and would work with stakeholders to consider the most relevant factors. Since CARB's 2005 Air Quality and Land Use Handbook recommended distances based on reducing exposure and cancer risk by 80 percent, we could start with that approach. However, in most cases an 80 percent reduction in cancer risk would still result in high residual cancer risks for most facility types, based on the latest health science and health risk assessments in development applications CARB has reviewed. Staff therefore suggests examining, at minimum, the distances needed to achieve an 85, 90, and 95 percent reduction in concentration and cancer risk.

In discussions and further analysis, CARB proposes that all of these factors should be considered to develop reasonable transition zone distances for local land use planners to consider when making zoning and project approval decisions for new and expanded freight facilities. We expect and welcome public feedback on these concepts.

13

B. Existing Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

In many communities, existing freight facilities are located in proximity to existing residencies, schools, health care facilities, and other sensitive receptors. To address health impacts related to emissions from freight facilities, a collective effort among State, regional, and local officials is needed. Table 3 summarizes some of CARB's activities to support efforts that reduce air quality impacts from freight facilities. CARB and air districts continue working to reduce air pollution through regulations and permitting while local agencies primarily address truck routing and parking issues. Together, the combination of actions can minimize air pollution and reduce negative health impacts from existing freight facilities.

Table 3. CARB Activities Supporting California's Efforts to Reduce Impacts from Existing Freight Facilities Near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

1. Strengthen CARB statewide regulations for new and in-use diesel-fueled equipment, plus charging/fueling infrastructure at freight facilities
2. Petition the federal government for stricter emission standards
3. Use incentives to demonstrate and deploy zero-emission technology and install freight infrastructure, with a focus on communities near freight facilities
4. Support air district Indirect Source Review rules at freight facilities
5. Encourage cities to develop/enforce local truck routing, idling limits, and parking requirements
6. Encourage Caltrans, other government agencies, and industry stakeholders to expand safe and clean truck parking, and reduce truck idling.

G-20 cont'd

Existing and new CARB regulations in development will further reduce air pollution from trucks and equipment. CARB staff plans to propose regulations that strengthen regulations for new and in-use diesel equipment, zero and near-zero emission equipment and charging/fueling infrastructure at freight facilities. CARB currently provides incentives to support demonstration projects that deploy zero-emission technologies, with a focus on communities near freight facilities.

We also advocate with other agencies at all levels for stricter national and international emission standards, zero-emission requirements, new air district rules for freight facilities, and methods to reduce truck impacts. Local governments can designate truck routes and restrict parking near sensitive land uses. Local air districts continue to develop methods for quantifying emissions, new rules to control emissions, and offer an array of financial incentives. State agencies continue to implement and update the California Sustainable Freight Action Plan, with commitments from Caltrans, the Energy Commission, CARB, and others to develop regulations, funding opportunities, and demonstration projects targeted at improving the statewide freight system.

14

C. New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors near Existing Freight Facilities

The State recognizes the critical need for affordable housing, infill development, and greenhouse gas reductions. The Freight Handbook will describe practices that could be implemented through land use policies and permitting to support development while minimizing pollution. Table 4 lists some examples of positive steps that development projects placing sensitive receptors near existing freight facilities can take.

Table 4. Potential Practices for New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors Near Existing Freight Facilities

1. Health impact disclosures to prospective occupants within transition zone
2. Exposure reduction strategies (air filters, trees, and walls)
3. Developer installation and replacement of air filtration devices through covenants, conditions, and restrictions recorded against the developed property to ensure existing and future owners comply with air filtration requirements throughout the life of the structure
4. Initiate a public process to address and implement truck routing, idling, parking and safety programs

G-20 cont'd

Development proposals can incorporate strategies to reduce exposure like maintaining vegetated walls and barriers between the project site and freight facilities. New freight projects can be designed to minimize community exposure to diesel exhaust along truck routes. Developers can disclose the potential health impacts to prospective occupants within transition zones, install and maintain air filters, and contribute to local investments that reduce emissions from nearby freight facilities.

Freight facility owners and operators can collaborate with local agencies on ways to minimize air pollution from existing operations. This may include upgrading diesel or other combustion equipment and providing operational data to inform land use decisions. Community residents can participate in land use planning and development review processes. To strengthen that participation, community members may wish to organize and engage local officials through advisory committees on solutions to address neighborhood concerns.

IV. Summary of Potential Practices

In the Freight Handbook, CARB staff will describe practices that may apply to one or more of the three land use scenarios. This Concept Paper introduces our approaches in several categories: broad-based, priority project-specific, and additional practices and mitigation. Tables 5 and 6 summarize the potential practices for implementing

entities: local government and air districts; freight facility developers, owners, and operators; and the public.

A. Broad-Based Practices

Local governments can address air pollution from freight facilities on a project-by-project basis and through a broader planning approach. The Freight Handbook will discuss broad-based practices that we are developing from a review of land use documents, ordinances, and conditions of approval as well as relevant land use planning policies and local implementation programs. Broad-based practices aim to help local governments address air pollution through land use documents. The Freight Handbook will encourage local officials to collaborate with air districts and community-based organizations on the development of land use policies.

B. Priority Project-Specific Practices

CARB has established a variety of programs, regulations, incentives, and policies designed to support the State's transformation toward a more sustainable freight system. These include a range of actions to minimize the community health impacts from freight facilities. The Freight Handbook will identify project-specific practices that local governments and freight facility developers, owners, and operators can implement. Community members and organizations are encouraged to provide early input to ensure goals are set that meet community expectations, monitor implementation and report any ongoing concerns.

G-20 cont'd

C. Additional Practices and Mitigation

Freight facilities can deploy additional practices that accelerate the transition to zero-emission operations, reduce the exposure of communities to air pollution, and minimize emissions from their activity and workforce commuting. Potential practices and mitigation include: vegetative walls and other solid barriers, air filtration devices, development programs, and lease agreements.

D. Resources for Development of Potential Practices

CARB staff routinely review and comment on environmental analyses prepared for individual freight facility projects pursuant to CEQA. Comments generally focus on the need for accurate characterization of a project's air pollutant emissions, appropriate modeling assumptions and results, health risk analysis, and mitigation to reduce air quality impacts. We post these comment letters on our website and encourage local governments, freight facility developers and owners, and the public to periodically check for updates to influence project design or mitigation.[3]

[3] California Air Resources Board, California Environmental Quality Act Comment Letters on Freight Facility Projects.

16

We drew from these letters, staff technology assessments and regulatory requirements, public comments at prior community meetings, and more than 50 documents prepared by other government agencies and advocacy organizations to identify potential practices, as summarized in this Concept Paper and being considered for the Freight Handbook. Many of the identified practices describe existing local government practices while others encourage collaboration between local agencies, freight facilities owners and operators, and the public. Land use planning and decision-making is a complex process. While the authority to regulate land use is primarily vested in local governments, air districts account for, and depend upon, local land use decisions when preparing air quality planning documents and conducting rule-making processes. For that reason, local governments and air districts should consider the identified practices when updating and implementing their planning efforts.

G-20 cont'd

Table 5 presents a list of potential practices to minimize community health impacts from freight facilities. We are sharing this list to signal the range of practices we are considering for inclusion in the Freight Handbook. A refined list of potential practices specific to warehouses, distribution centers, and cold-storage facilities is summarized in Table 6. We are seeking input on the general substance of all potential practices as well as what level the Freight Handbook should describe practices and appropriate methods to implement a practice.

This page deliberately left blank.

18

Table 5. Summary of Potential Practices to Minimize Community Health Impacts from Freight Facilities

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
BROAD-BASED			
Local Freight Committee	Convene a local freight committee comprised of community members and freight representatives to solicit input on land use policies that provide a framework for assessing air quality impacts and addressing community exposure from freight facility projects.	Facility or industry representatives participate on a local freight committee to incorporate community suggestions, gather or provide information, and consider feedback to inform the siting and design of freight facility projects before submitting permit applications.	Form or participate in a freight committee, to help organize and advocate for changes to planning processes and permitting of freight facility projects.
Economic Development Coalition	Establish a coalition of community members, industry stakeholders, and local economic development entities to identify approaches to providing economic and public health benefits to communities near freight facilities.	Facility or industry representatives participate in the coalition to provide operations information and inform cost effectiveness discussions supporting an efficient and strategic deployment of cleaner freight vehicles and equipment.	Building off existing community air protection efforts, participate in the coalition and identify community-specific priorities that determine the balance of economic and public health considerations.

G-20 cont'd

19

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Land Use Policies	Develop land use policies for addressing and minimizing community exposure to air pollution from increased development of freight-related projects when updating land use planning documents.	Design freight facility projects that are consistent with land use policies intended for addressing community exposure prior to submitting permit applications.	Participate in local processes to update land use documents by advocating and proposing land use policies.
Local Ordinances	Update ordinances (i.e., site design standards and operational standards in zoning ordinances) and associated permitting conditions consistent with updated ordinance standards that require freight projects to achieve zero-emission operations.	Integrate zero-emission technologies to the maximum extent feasible and incorporate project design features that minimize community exposure prior to submitting permit applications.	Engage local agencies during the development of ordinances and permitting conditions.

G-20 cont'd

20

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Rezone and Remove Nonconforming Uses	Update or adopt an ordinance to phase out freight facilities or operations in close proximity to sensitive receptors when updating the General Plan and zoning code.	Phase out freight facility operations adjacent to sensitive receptors or phase out older equipment and, where possible, avoid siting new and expanding freight facilities in proximity to sensitive receptors.	Advocate and support local officials in adopting or updating ordinances that restrict or phase out freight operations in areas of the community impacted by existing freight facilities.
Improvement and Financing Districts	Create improvement and/or financing districts to generate revenue for infrastructure that supports zero-emission technologies at freight facilities.	Collaborate with local agencies to identify financing needs for supporting needed infrastructure improvements at freight facilities; commit to investments that achieve zero-emission operations.	Participate in processes to form financing districts that link investments in fully zero-emission operations with benefits to the community.

G-20 cont'd

21

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Development Programs and Agreements	Require freight facilities to establish or contribute towards publically administered Development Programs that help fund projects for reducing community exposure to air pollution from freight.	Negotiate with local agencies and community organizations to establish or contribute towards publically administered development programs that reduce community exposure to air pollution.	Participate in processes to establish or administer development programs in support of activities that fund appropriate projects that reduce community air pollutant exposure.
Cumulative Analysis Criteria	Establish screening criteria to evaluate a freight facility's contribution to a cumulatively considerable air quality impact including but not limited to identifying impacted areas, adopting local thresholds of significance, and developing standardized modeling parameters.	Consider a freight facility's surrounding air quality conditions to inform siting decisions and implementing all feasible practices for reducing air pollution and community exposure before submitting permit applications.	Advocate for planning agencies to collaborate with air districts when developing cumulative thresholds, impact significance criteria, and mitigation to address cumulative impacts from freight facilities.

G-20 cont'd

22

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
PRIORITY PROJECT-SPECIFIC			
Health Protective Siting	Zone freight activities with consideration of avoiding health impacts to sensitive receptors when updating the General Plan and zoning code.	Prioritize development at properties with adequate distances from sensitive receptors and design projects to minimize community exposure.	Inform zoning and permitting decisions to ensure adequate distances are provided for protecting nearby sensitive receptors.
Zero-Emission Technology	Adopt or update site design and operational standards, consistent with updated standards and associated conditions of approval, that require freight facility projects to operate fully with zero-emissions everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Commit to fully operate with zero-emissions and invest in infrastructure to support zero-emission equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else, when designing or updating a freight facility.	Inform local processes to develop conditions of approval, monitor implementation and report any ongoing concerns.

G-20 cont'd

23

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Zero-Emission Infrastructure	Adopt or update site design and operational standards, consistent with updated ordinance standards, and associated conditions of approval to require infrastructure for freight projects that support full zero-emission operation at the facility.	Commit to investments in zero-emission technologies and infrastructure for all facility operations and service providers, and coordinate with utility companies to provide zero-emission infrastructure when developing site design.	Advocate for land use decisions that help expedite the development of the zero-emission charging/ fueling infrastructure in California.
Clean Heavy-Duty Truck Parking	Establish a heavy-duty truck parking program that provides clean, safe, and affordable truck parking with support for zero-emission technologies.	Reserve land for clean heavy-duty truck parking and install zero-emission infrastructure to eliminate truck and TRU emissions while parked.	Inform land use decisions to identify heavy-duty truck parking, monitor implementation and report any ongoing concerns.
Truck Routing	Designate all truck routes, within community input, that service freight facilities to avoid sensitive receptors when updating land use planning documents and permitting conditions.	Inform local agencies and community members to design truck routes to serve freight facility needs and minimize exposure to air pollution.	Inform land use decisions to designate truck routes, and monitor implementation and report any ongoing concerns.

G-20 cont'd

24

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Residential Project Design	Update or adopt ordinances that require site design and operational standards and associated conditions of approval for buildings with sensitive receptors located downwind of freight facilities to require practices that reduce sensitive receptors' exposure to the freight facility's emissions when permitting new development.	Coordinate with local agencies to identify financial tools that accelerate or support investments in zero-emission technology.	Support land use decisions that ensure local agencies consider all applicable practices and permitting conditions that will result in reductions in exposure.
Freight Facility Design	Update or adopt ordinances that require site design and operational standards and associated conditions of approval that require site design features for reducing air pollution and minimizing community exposure during development review.	Design freight facility access points and operational activities to minimize community exposure prior to submitting permit applications.	Support land use decision processes that ensure local agencies consider all applicable practices and permitting conditions that will support reductions in exposure to local communities.

G-20 cont'd

25

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
ADDITIONAL PRACTICES AND MITIGATION			
Vegetation and Other Barriers	Establish a program that requires freight facility owners to maintain vegetated walls or other appropriate barriers that separate facility operations from sensitive receptors when permitting freight facilities.	Dedicate land and resources to construct and maintain vegetated barriers or other appropriate tools to cut exposure when designing freight facilities.	Support land use decisions that ensure local agencies require freight facilities to construct and maintain vegetated walls or other barriers, where appropriate.
Air Filtration Devices	Partner with regional planning agencies and air districts to develop a program for installing and maintaining high-efficiency air filtration devices in existing and new sensitive receptors in proximity to freight facilities.	Support programs to install and maintain high efficiency air filters in existing buildings with sensitive receptors in proximity of freight facilities.	Collaborate with residential property owners and management organizations to promote the deployment, maintenance, and repair of air filtration systems through covenants, conditions, and restrictions.

G-20 cont'd

26

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Implement Required Clean Technology Early	Collaborate with CARB or the local air district on local actions to accelerate implementation of cleaner technologies required by State or district regulation at new freight facilities.	Commit to fund and develop a schedule for early compliance with CARB or district regulations.	Monitor implementation of clean technology programs and report any ongoing concerns.
Rate Structures	Adopt or update conditions of approval that require a rate structure that incentivizes freight facilities to contract with trucking, rail, and marine companies that utilize the lowest emitting transport technologies.	Implement a rate structure and charge more for access by higher emitting trucks, locomotives, or other equipment, and include a fee rate for zero-emission technologies.	Support the development and adoption of rate structures that support the accelerated deployment of zero-emission equipment.
Community Benefit Agreements	Support or administer community benefit agreements to address air quality impacts from freight facility projects and community exposure to air pollution.	Establish or support community benefit agreements to implement practices that provide air pollutant reductions at facilities and provide local benefits to impacted communities.	Negotiate with local agencies and developers to establish and implement community benefit agreements that address community air pollutant exposure from freight activities; monitor implementation and report any ongoing concerns.

G-20 cont'd

27

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Lease Agreements	Adopt or update conditions of approval for permitting that require freight facilities to use the cleanest commercially available technologies.	Include contractual language in lease agreements that requires zero-emission technologies everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Advocate for the development of freight facility agreements that incorporate commitments for deployment of clean technologies.
Advanced Technologies	Require freight facilities to conduct periodic reviews of operations to identify opportunities to upgrade or phase out older equipment, as part of Development Agreements.	Conduct periodic reviews and commit to purchase, or require tenants to utilize zero-emission technologies or near zero-emission technologies if zero is not yet feasible.	Monitor implementation and report any ongoing concerns.
Mitigation Monitoring Reporting Program	Develop mitigation monitoring and reporting programs (MMRPs) to require periodic data and operational information to demonstrate compliance.	Post MMRPs and supporting documentation for public review with periodic updates that describe efforts to implement applicable practices.	Participate in development of MMRPs, follow implementation and report any ongoing concerns.

G-20 cont'd

28

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Public Contracting	Include requirements in public contracting document (i.e., Request for Proposals and Request for Qualifications) to specify that bidders implement practices that reduce air quality impacts and address community exposure to air pollution.	Submit proposals that meet or exceed the minimum set criteria for bidders to implement practices that reduce air quality impacts and address community exposure to air pollution.	Monitor implementation and report any ongoing concerns.
Employee Commuting	Establish or update program guidelines with sufficient resources to support alternative commute modes for freight facilities with more than 50 employees.	Commit to fund transit pass subsidies and support incentive programs for other forms of commuting; provide travel data to inform future program updates.	Participate in commuter programs, monitor implementation, and report any ongoing concerns.

G-20 cont'd

29

This page deliberately left blank.

30

CONCEPTS FOR WAREHOUSE FACILITIES

The Freight Handbook will include practices for the siting, design, construction, and operations of warehouse facilities. Warehouses and other facilities (distribution centers, cold storage, etc., referred to collectively as "warehouse facilities") operate under similar conditions with primarily combustion-powered vehicles and equipment. As of 2019, most freight vehicles and equipment at warehouses run on diesel fuel.

In many communities, warehouse facilities are sited near existing transportation networks to access regional markets. Siting new warehouse facilities within or in close proximity to a neighborhood can compound air quality impacts from other air pollutant sources such as high-volume roadways and existing freight facilities nearby.

We are developing warehouse practices to serve as an informational resource to help communities, decision-makers, and warehouse facility developers, owners, and operators identify and implement practices to minimize community exposure to air pollution from these facilities. As described in CEQA comment letters, CARB staff continues to support building these facilities to achieve full zero-emission operation, implementing zero-emission technologies everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.

Table 6 lists potential practices at warehouse facilities. The potential practices below compliment or expand upon potential practices listed in Table 5. As discussed above, local governments and air districts should consider these potential practices when permitting projects and when updating and implementing planning efforts. We are seeking input on the substance of potential practices as well as what level CARB should describe practices and appropriate methods to implement practices for warehouse facilities.

G-20 cont'd

31

This page deliberately left blank.

Table 6. Summary of Potential Practices at Warehouses and Distribution Centers

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
PLANNING, REVIEW, AND PERMITTING			
Update Zoning	Review and update, or adopt, a zoning ordinance (site design and operational standards) to ensure warehousing activities are permitted in areas based on health risks from the warehouse's operational air pollution emissions, an appropriate distance from sensitive receptors.	Identify development opportunities that allow facility operations, or design facility projects, at appropriate distances; utilize air dispersion modeling, as necessary, to estimate exposure risk and inform design-level decisions prior to identifying air pollutant mitigation.	Engage local agencies and participate in review and updates to zoning ordinances for minimizing community exposure to air pollutant emissions.
Zero-Emission Operations: Land Use Policies and Standard Permitting Conditions of Approval	During permit review process, and through standard permitting conditions, to require freight facilities fully operate with zero-emissions equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Design projects to integrate zero-emission technologies to the extent feasible prior to submitting permit applications; commit to contractual obligations that fully require tenants to zero-emission equipment operations everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Support local agencies' adoption of land use policies and standard permitting conditions that will result in the deployment of cleaner technologies.

G-20 cont'd

33

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Zero-Emission Infrastructure: Land Use Policies and Standard Permitting Conditions of Approval	Adopt or update ordinances that require site design and operational standards and associated standard permitting conditions to provide needed infrastructure for zero-emission operation.	Commit to investments in zero-emission infrastructure at the project-design stage; deploy zero-emission technologies and incorporate contractual language requiring tenants to utilize zero-emission technologies to the maximum extent possible.	Review and provide input into project designs and monitor implementation and report any ongoing concerns.
Zero-Emission Infrastructure: Investment Plan	Update or adopt permit conditions that require facility developers and owners to establish an investment plan supporting zero-emission infrastructure.	Establish an investment plan and adopt a timeline for making investments in zero-emission technologies; and anticipate emerging technologies becoming commercially available.	Review and assess project designs, monitor implementation and report any ongoing concerns.
Regulatory Compliance, Idling Limits and Dock Electrification	Help enforce mobile and off-road source regulations to limit unnecessary idling, and electrify loading docks serviced by trucks with transport refrigeration units (TRU) or auxiliary power units (APU).	Commit to implementing zero-emission technologies and incorporate contractual language to require tenants demonstrate compliance with mobile and off-road source regulations, limit unnecessary idling, and electrify loading docks servicing trucks with TRUs or APUs.	Review project proposals, and monitor implementation and report any ongoing concerns.

G-20 cont'd

34

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Development Programs and Agreements	Require owners and operators to contribute or establish Development Agreements that fund projects for reducing community exposure to air pollution from freight.	Negotiate with local agencies and community organizations to establish or contribute towards publically administered development programs that reduces community exposure to air pollution.	Participate in processes to establish and administer development programs that fund projects that result in a reduction in community air pollutant exposure.
ZERO EMISSION TECHNOLOGY			
Zero and Near-Zero Emission Technologies for All Project Phases	Condition permit approval of warehouse proposals to integrate zero-emission technologies during construction and operational phases everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Incorporate zero-emission technologies into business decisions, financial planning, and contractual language for construction phases, operational activities, and tenant lease agreements.	Collaborate with freight facility developers and owners, monitor implementation, and report any ongoing concerns.

G-20 cont'd

35

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Upgrade On-site Service Equipment	As a permitting condition, require all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) to fully operate with zero-emissions, where possible.	Install necessary infrastructure to support zero-emission technologies and contractually obligate tenants to deploy commercially available zero-emission technologies to the maximum extent possible.	Monitor implementation, and report any ongoing concerns.
Intermodal Facility Transport Activities	Organize a committee to collaborate with warehousing facilities owners and operators to maximize cargo transport efficiency of cargo handling, and long-haul truck activities	Integrate operation systems using cleanest available technologies; coordinate management systems to maximize operational efficiency for minimizing unnecessary idling of all diesel engines.	Monitor implementation and report any ongoing concerns.
Fueling Infrastructure for Zero-Emission Operations	Condition permit approval of warehouse facilities to install fueling infrastructure (electric charging and hydrogen fueling stations) for maximizing on-site zero-emission operations.	Incorporate fueling infrastructure to support zero-emission operations into project to the maximum extent possible; coordinate construction plans and activities with utility providers prior to submitting permitting applications.	Monitor implementation and report any ongoing concerns.

G-20 cont'd

36

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
On-Site Renewable Energy Generation	Encourage through adoption of general plan policies and goals or through conditioning permit approval of warehouse facilities to incorporate renewable energy resources into project designs or exceed applicable green building standards for warehouses.	Incorporate on-site renewable energy production—solar, wind, etc.—into project design; coordinate with utility providers prior to submitting permitting applications and integrate necessary infrastructure.	Advocate for local governments to develop requirements and incentives for the usage of renewable energy at facilities.
On-Site Microgrid Energy Storage	Coordinate integration of on-site microgrid energy deployment between facilities and utility providers.	Integrate microgrids into project designs to help reduce electricity costs, distribute on-site energy demand across, and increase storage capacities.	Monitor implementation and report any ongoing concerns.
On-Site Energy Storage	Review permitting practices for opportunities to streamline review processes to encourage on-site energy storage solutions for supporting fully zero-emission operations.	Integrate renewable energy storage to ensure adequate storage capacities, including surplus margins, to provide alternative emergency backup power.	Advocate for local governments to develop efficient permitting processes that allow for deployment of energy storage systems.

G-20 cont'd

37

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
WAREHOUSE FACILITY DESIGN			
Establish Truck Routes	Design routing programs in the General Plan to address congestion, provide adequate truck parking capacity, and account for delivery schedules to avoid peak commute periods with a goal of directing trucks around sensitive receptors.	Inform local agencies and community members to establish truck route programs that service facility needs while prioritizing routes that minimize community exposure to air pollution.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.
Provide Truck Parking	Condition permit approval of warehouse facilities to provide adequate space for truck parking, staging, and loading activities with incentivizes for zero-emission delivery vehicles.	Collaborate with local agencies and utility providers to provide necessary infrastructure for supporting zero-emission delivery vehicles.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.
Adequate Truck Route Signage	Condition permit approval of warehouse facilities in coordination with Caltrans to install adequate wayfinding strategies along truck routes from highways to facility parking areas.	Provide trainings to inform employee and tenants on proper truck routing and parking programs.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.

G-20 cont'd

38

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Provide Multimodal Commuter Pathways	Condition permit approval of warehouse projects to provide or promote alternative transportation modes for reducing vehicular commuter dependence.	Integrate multimodal design into and around facility access points with the existing transportation infrastructure including connections to existing and planned pedestrian and bicycle pathways.	Review and assess project proposals, monitor implementation, and report any ongoing concerns.
Funding for Freight Transport Infrastructure	Apply and match Federal, State, and local funding sources to support freight transport infrastructure that improves freight facility connectivity and maximizing operational efficiency.	Maximize public funding opportunities to improve facility operations through siting, access, and connectivity to established freight transport corridors.	Advocate for project proposals maximizing public investments in freight transportation planning efforts that improve freight efficiency.
Building Codes for Zero-Emission Charging Stations	Update local codes to require infrastructure for electrification or fueling stations, or adopt State building code for medium and heavy-duty zero-emission infrastructure, as available.	Design or modify facilities to integrate charging station infrastructure; coordinate with utility providers to maximize on-site potential for supporting zero-emission vehicles.	Monitor implementation and report any ongoing concerns.

G-20 cont'd

39

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Design Guidelines for Minimizing Community Exposure	Update or adopt site design standards to locate entrance gates, loading docks, staging areas, and parking facilities away from sensitive receptors.	Incorporate design features that demonstrably reduce a community's exposure from loading, staging, and parking activities.	Monitor implementation and report any ongoing concerns.
Vegetative and Other Solid Barriers	Update or adopt site design standards to promote vegetative or other solid barriers for reducing community exposure to air pollution from nearby roadway and on-site activities.	Identify potential air pollutant sources on-site and access routes that may impact nearby communities for informing the location of vegetative or solid barriers, with appropriate design parameters to reduce particulate matter.	Monitor implementation and report any ongoing concerns.
Design Features to Maximize On-Site Truck Maneuvering Efficiency	Review or adopt site design standards to encourage facility designs that maximize efficiency of on-site trucking and loading activities including: turning radii, simultaneous container loading and unloading, and connectivity to site access and roadways.	Design facilities to maximize available space for trucking and loading activities including: turning radii, simultaneous container loading and unloading, and connectivity to site access and roadways.	Monitor implementation and report any ongoing concerns.

G-20 cont'd

40

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Multimodal Facility Design	Reduce air quality impacts associated with multimodal facility projects by maximizing transiting efficiencies between transport modes for distributing containers and truck trailers.	Integrate access and loading operations into existing intermodal freight systems for maximizing capacities and operational efficiency.	Monitor implementation and report any ongoing concerns.
WAREHOUSE FACILITY CONSTRUCTION			
Construction Emissions Minimization Plan	Update or adopt an ordinance to establish minimum criteria for construction emissions minimization plans that apply to projects in impacted communities.	Coordinate with local agencies to identify projects in impacted areas and incorporate plan criteria into contractual language for minimizing emissions from all construction-related activities to the extent feasible.	Monitor implementation and report any ongoing concerns.

G-20 cont'd

41

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Electrify Low Kilowatt Equipment	Update or adopt ordinances that require site design and operational standards and associated permit conditions to require electrifying all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers, etc.) wherever possible.	Integrate needed electrical infrastructure and hookups into construction planning; include contractual language that requires all contractors to electrify low kilowatt equipment wherever possible.	Monitor implementation and report any ongoing concerns.
Accelerate Regulatory Compliance	Encourage or condition permit approvals of warehouse proposals to maximize commercially available clean-engine technologies for heavy-duty trucks servicing the site.	Include contractual language that requires all contractors to utilize commercially available clean-engine technologies for heavy-duty trucks everywhere possible.	Monitor implementation and report any ongoing concerns.
Minimize Engine Idling	Update or adopt ordinances that require site design and operational standards and associated permit conditions to minimize diesel engine idling for no more than two minutes.	Inform contractors servicing the site of diesel engine idling limits by posting signage at access points, monitoring delivery activities, and training employees to maximize equipment efficiency.	Monitor implementation and report any ongoing concerns.

G-20 cont'd

42

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Utilize Generators Utilizing Renewable Fuels	Enforce permit conditions that require generators utilizing renewable fuels to be used, where electrification is infeasible.	Electrify equipment to the maximum extent feasible with connections to the power grid, utilize renewable fuels everywhere else.	Monitor implementation and report any ongoing concerns.
WAREHOUSE FACILITY OPERATIONS			
Minimize Refrigerants	Condition permit approval of warehouse proposals that include cold storage facilities to use low Global Warming Potential (GWP) refrigerants.	Use low GWP refrigerants at cold storage facilities. (e.g. <150 GWP, ammonia, CO_2, Hydrocarbons).	Support proposals that use low GWP refrigerants at cold storage facilities; and monitor implementation.
Minimum Green Building Standards	Update or adopt design guidelines that require facility operations to exceed standard green building criteria for reducing on-site air pollution and nearby community exposure.	Incorporate green building features that demonstrably address on-site air pollution source or minimize nearby community exposure through design and modified operational activities.	Support proposals for applicable green building features, monitor implementation, and report any ongoing concerns.

43

G-20 cont'd

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Truck Service Efficiency	Support facility owners and operators to integrate new technologies for improving efficiency of trucking activities to minimize queuing and in-terminal waiting periods.	Coordinate techniques and methods to improve truck delivery and loading activities using available software packages; train service providers on methods to group, streamline, or otherwise maximize facility efficiency during heavy delivery periods.	Collaborate with facility owners and operators to implement technologies, monitor implementation, and report any ongoing concerns.
Container Yard Management Efficiency	Support facility owners and operators to incorporate technologies for operational activities or on-site practices that improve equipment management practices and increase goods movement efficiency.	Coordinate yard management techniques and methods using available software packages to virtualize container loading areas for improving on-site exchanges between import and export activities.	Monitor implementation and report any ongoing concerns.
Coordinate Neighboring Purchasing and Deliveries	Support facility logistics for minimizing duplicative supply deliveries to minimize daily truck visits.	Coordinate supply needs and delivery service contacts with neighboring facilities to maximize supply receiving and shipping activities.	Monitor implementation and report any ongoing concerns.

G-20 cont'd

44

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Freight Traffic Information Systems	Collaborate with public agencies to develop and implement a "push" freight traffic information system through a public platform for data sharing that improves logistics planning and truck delivery scheduling.	Support development and implementation of a "push" freight traffic information system by providing trucks servicing a facility with real-time traffic data.	Monitor implementation and report any ongoing concerns.
FINANCING, GRANTS, AND INCENTIVES			
Grants for Zero-Emission Infrastructure and Equipment, Renewable Fuels, and Efficiency	Utilize grants for zero-emission vehicles and equipment, renewable fuel production, charging, and hydrogen fueling infrastructure, and efficiency improvement technologies.	Maximize investments to integrate and deploy zero-emission vehicles and equipment, produce and store renewable fuels, provide charging and fueling infrastructure, and implement efficiency improvements.	Monitor implementation and report any ongoing concerns.

45

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Funding for Zero-Emission Technology	Support and fund zero-emission TRU and APU technology to modernize existing facilities and support integrating with proposals for new facilities.	Maximize investments in zero-emission technologies and incorporate contractual language for tenants and service providers to deploy vehicles with TRUs or APUs capable of integrating with electrified loading docks.	Monitor implementation and report any ongoing concerns. G-2 cont'd
Joint Public and Private Investment Opportunities	Identify local opportunity areas to support clean-technology investments through Property and Business Improvement Districts (PBID) or Enhanced Infrastructure Financing Districts (EIFD).	Collaborate with local agencies to establish and support PBIDs or EIFDs; coordinate with neighboring facilities to maximize investments in business opportunities that support fully zero-emission operations.	Support local agencies and facility owners and operators to establish PBIDs and EIFDs for financing fully zero-emission operations; monitor implementation and report any ongoing concerns.
Projects to Demonstrate Emerging Technologies	Support funding opportunities for demonstrating zero-emission technology technologies for existing and new freight facilities.	Maximize investment opportunities and implement zero-emission demonstration projects in all applicable facility operations.	Support local agency and facility owners and operators to identify opportunities; monitor implementation and report any ongoing concerns.

G-20 cont'd

46

This page deliberately left blank.

LIST OF RESOURCE DOCUMENTS

CARB staff reviewed an extensive selection of resource documents to inform development of the Concept Paper for the Freight Handbook and identify practices for the siting, design, construction, and operation of freight facilities to minimize the resulting air pollution impacts on nearby communities. Some of these documents are listed below. In addition to these documents, this Concept Paper reflects public input CARB gathered through developing and implementing state-level programs related to freight. CARB has also considered the feedback received from local workshops to develop community monitoring and emission reduction plans, the Pathways to Zero and Near-Zero Emissions document, and the Sustainable Freight Action Plan, as well as updated information posted on State and local agency websites.

- Bay Area Air Quality Management District (BAAQMD). *California Environmental Quality Act Air Quality Guidelines* (2017).
- BAAQMD. *Improving Air Quality & Health in Bay Area Communities: Community Air Risk Evaluation Program Retrospect & Path Forward* [2004 - 2013] (2014).
- BAAQMD. *Planning Healthy Places: A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning* (2016).
- BAAQMD. *Regulation 11, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities* (2017).
- Bay Conservation and Development Commission, Metropolitan Transportation Commission (MTC). *San Francisco Bay Area Seaport Plan* (2017).
- CARB. *Air Quality and Land Use Handbook: A Community Health Perspective* (2005).
- CARB. *Let's Clear the Air: A Public Participation Guide to Air Quality Decision Making in California* (2005).
- CARB. *Sustainable Freight: Pathways to Zero and Near-Zero Emissions* (2015).
- CARB. *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways* (2017).
- California Department of Transportation (Caltrans). *California Freight Mobility Plan* (2014).
- Caltrans. *Mitigating Freight Impacts on Nearby Communities – Preliminary Investigation* (2015).
- Caltrans, CARB, *et. al. California Sustainable Freight Action Plan* (2016).
- California Air Pollution Control Officers Association. *Health Risk Assessments for Proposed Land Use Projects* (2009).
- California Governor's Office of Planning and Research (Cal OPR). *State of California General Plan Guidelines* (2017).
- Cal OPR. *The Planner's Guide to Specific Plans* (2001).
- City of Oakland. *West Oakland Truck Management Plan* (2018).
- City of Riverside. *Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities* (2008).

G-20 cont'd

48

- Biggs, D., Stansbery, S., and Nance, M. American Planning Association. *100 Great Community Engagement Ideas* (2018).
- Environmental Defense Fund. *Green Freight Handbook* (2014).
- Institute for Local Government. *Effective Public Engagement through Strategic Communication* (2015).
- Institute for Local Government. *What is Public Engagement and Why Should I Do It?* (2016).
- Los Angeles County Metropolitan Transportation Authority, Caltrans. *Healthy Communities and Healthy Economy* (2009).
- MTC, Bay Area Goods Movement Collaborative. *Community Collaborative for Sustainable Freight* (2014).
- MTC. *San Francisco Bay Area Goods Movement Plan* (2016).
- MTC, *et. al. Freight Emissions Reduction Action Plan* [for Plan Bay Area 2040] Final Supplemental Report (2017).
- MTC, *et. al. Plan Bay Area 2040, Draft Environmental Impact Report* (SCH# 2016052041) (2017).
- National Center for Sustainable Transportation. *Freight Efficiency Whitepapers* (2016).
- Natural Resources Defense Council. *Clean Cargo: A Guide to Reducing Diesel Air Pollution from the Freight Industry in Your Community* (2012).
- Natural Resources Defense Council. *Defend Your Air* (2012).
- PolicyLink. *The Sustainable Communities Initiative: The Community Engagement Guide for Sustainable Communities* (2012).
- Port of Long Beach. "Air Quality Programs" (website 2018).
- Port of Long Beach. *Port Master Plan, Update 1990* (As amended, 2005).
- Ports of Long Beach and Los Angeles. *San Pedro Bay Ports Clean Air Action Plan* (2017).
- Port of Los Angeles. *Port Master Plan* (2018).
- Port of Oakland. *Growth With Care: Port of Oakland Strategic Business Plan* 2018-2022 (2018).
- San Diego Unified Port District. *Port Master Plan* (2017).
- San Diego Association of Governments. *2050 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2010041061) (2011).
- San Diego Unified Port District. *Port Master Plan* (2017).
- San Joaquin Council of Governments. *2018 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2017032042) (2018).
- San Joaquin Valley Unified Air Pollution Control District (SJVAPCD). *Guidance for Assessing and Mitigating Air Quality Impacts* (2015).
- SJVAPCD. *Guidance for Assessing and Mitigating Air Quality Impacts* (2015).
- SJVAPCD. *Rule 3180: Administrative Fees for Indirect Source Review* (Adopted 2005, as amended 2018).

G-20 cont'd

- SJVAPCD. *Rule 9150: Indirect Source Review* (Adopted 2005, as amended 2017).
- Transportation Research Board, National Cooperative Freight Research Program. *Guidebook for Understanding Goods Movement* (2012).
- Southern California Association of Governments (SCAG). *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2015031035) (2015).
- SCAG. *Industrial Warehousing in the SCAG Region* (2018).
- South Coast Air Quality Management District (SCAQMD). *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005).
- SCAQMD. *Model Air Quality Element* (Reviewed, 2019).
- SCAQMD. *Rule 1402: Control of Toxic Air Contaminants from Existing Sources* (Adopted 1994, as amended 2016).
- Transportation Research Board, National Cooperative Highway Research Program. *Guide to Deploying Clean Truck Freight Strategies* (2017).
- Transportation Research Board, National Cooperative Freight Research Program. *Issues Identified and Lessons Learned from NCFRP 24 - Smart Growth and Urban Goods Movement* (2013).
- Transportation Research Board, National Cooperative Freight Research Program. *Background Research Material for Freight Facility Location Selection: A Guide for Public Officials* (2011).
- United States Department of Transportation, Federal Highway Administration. *Freight and Air Quality Handbook* (2012).
- United Sates Environmental Protection Agency, SmartWay. *Vision 2020: A New Era of Freight Sustainability* (2015).
- West Oakland Environmental Indicators Project. *Clearing the Air: Reducing Diesel Pollution in West Oakland* (2003).
- Western Riverside Council of Governments. *Transportation Uniform Mitigation Fee Program* (2019).

G-20 cont'd

50

Appendix D

CONDITIONS OF APPROVAL FOR CENTERPOINT PROPERTIES (Applicant/Owner): COUNTY FILE #'s CDDP18-03007 and CDMS19-00009,

Project Approval:

1. Development is APPROVED as generally described in the application materials received by the Department of Conservation and Development/Community Development Division (CDD) on August 28, 2018, (including Tentative Map submitted October 29, 2019), and subject to the conditions below.

Compliance Review:

2. At least 30 days prior to issuance of a building permit, the applicant shall provide a permit compliance report to CDD for review and approval. The report shall identify all conditions of approval that are administered by CDD. The report shall document the measures taken by the applicant to satisfy all relevant conditions. Copies of the permit conditions may be obtained from CDD. Unless otherwise indicated, the applicant will be required to demonstrate compliance with the conditions of this permit prior to requesting County issued permits.

   The permit compliance review is subject to staff time and materials charges, with an initial deposit of $1,000 which shall be paid at the time of submittal of the compliance report. G-21

3. At least 30-days prior to occupancy, any proposed tenant shall submit a Property Use Verification (PUV) application to CDD staff in order to verify consistency with this permit. The PUV will be necessary to obtain any required business licenses from the County Tax Collector's Office.

General Provisions:

4. Any deviation from or expansion beyond the limits of this permit approved under this application may require the filing of a request for modification of the Development Plan Permit.

5. A publicly visible sign shall be posted on the property with the telephone number and person to contact regarding construction-related complaints. This person shall respond and take corrective action within 24 hours. The CDD phone number to call in complaints shall also be visible to ensure compliance with applicable regulations.

6. Applicant shall make best efforts to hire employees, workers, and subcontractor components for jobs from the Richmond/North Richmond community.

7. At least 30 days prior to submittal of a building permit for signage, a detailed sign program shall be submitted for the review and approval of CDD.

8. The applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $125,000 as its fair share contribution towards the cost of a General Plan/Zoning Ordinance update for the North Richmond area.

Aesthetics:

9. At least 30 days prior to applying for a building permit, the applicant shall submit for review and approval by the Contra Costa County Department of Conservation and Development staff a Final Lighting Plan. Light standards shall be low-lying and exterior lights on the buildings shall be deflected so that lights shine onto the applicant's property. **(Mitigation Measure (MM) AES – 1)**

Air Quality:

10. The project applicant shall ensure, at minimum, the use of equipment that meets the United States Environmental Protection Agency's (EPA) Tier 4 Interim emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower for all site preparation, grading, and building construction activities, unless it can be demonstrated, to the Contra Costa County Department of Conservation and Development's satisfaction, that such equipment is not available. Any emission control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 4 Interim emissions standards for a similarly sized engine, as defined by the California Air Resources Board (ARB) regulations.

    Prior to the issuance of building or grading permits, the project applicant shall ensure that all construction (e.g., demolition and grading) plans clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment over 50 horsepower for the specific activities stated above.

    During construction, the project applicant shall ensure that a list of all operating equipment in use on the construction site is maintained on-site for verification by the Contra Costa County Department of Conservation and Development. The construction equipment list shall state the makes, models, Equipment Identification Numbers, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the

G-21 cont'd

manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. **(MM AIR-2a)**

11. The project's construction contractor shall comply with the following Bay Area Air Quality Management District (BAAQMD) Best Management Practices (BMPs) for reducing construction emissions of PM_{10} and $PM_{2.5}$:

    - Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour (mph). Reclaimed water should be used whenever possible.
    - To control dust, pave, apply water twice daily or as often as necessary, or apply (nontoxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
    - Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
    - Sweep daily with water sweepers (using reclaimed water if possible) or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
    - Sweep public streets daily (with water sweepers using reclaimed water if possible) or as often as needed in the vicinity of the project site to keep streets free of visible soil material.
    - Hydroseed or apply nontoxic soil stabilizers to inactive construction areas.
    - Enclose, cover, water twice daily, or apply nontoxic soil binders to exposed stockpiles (e.g., dirt, sand, etc.).
    - Limit vehicle traffic speeds on unpaved roads to 15 mph.
    - Replant vegetation in disturbed areas as quickly as possible.
    - Install sandbags or other erosion control measures to prevent silt runoff from public roadways. **(MM AIR-2b)**

G-21 cont'd

12. Prior to issuance of the certificate of occupancy, Contra Costa County shall require future tenants proposing operations that have potential to emit nuisance odors to prepare an odor management plan that identifies project design features, measures, and control technologies to ensure compliance with Bay Area Air Quality Management District (BAAQMD) Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. Facilities that have the potential to generate nuisance odors include, but are not limited to:

    - Composting, green waste, or recycling facilities
    - Fiberglass manufacturing facilities
    - Painting/coating operations
    - Large-capacity coffee roasters
    - Laboratory operations
    - Food-processing facilities

    The odor management plan for the proposed facility shall be submitted to the County prior to the issuance of the certificate of occupancy. During operation of the proposed facility, the County shall conduct periodic evaluation of on-site odors per the schedule and reporting requirements outlined in the odor management plan. **(MM AIR-4)**

G-21 cont'd

Zero Emission Vehicle Requirements:

13. The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all on-going operational responsibilities.

    a. The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.

    "Domiciled at the project site shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission heavy-duty trucks which require service can be temporarily replaced with model year 2014 or later trucks. Replacement trucks shall be used for only the minimum time required for servicing fleet trucks.

b. The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2027.

"Domiciled at the project site" shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission vehicles which require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles.

G-21 cont'd

The property owner/tenant/lessee shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the project site.

c. The property owner/tenant/lessee shall make all reasonable efforts to procure the zero emission vehicles/trucks required to meet the "clean fleet" requirements in (a) and (b) above. In the event that there is a disruption in the manufacturing of zero emission vehicles/trucks or that sufficient vehicles/trucks are not commercially available for the intended application, the "clean fleet requirements" may be adjusted as minimally as possible by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks. The property owner/tenant/lessee shall provide all necessary documentation describing efforts made to meet clean fleet requirements as part of any adjustment request. The CDD staff may seek the recommendation of the California Air Resources Board in determining whether there has been a manufacturing disruption or insufficient vehicles/trucks commercially available for the intended application.

d. The property owner/tenant/lessee shall ensure all on-site equipment and vehicles (e.g., yard hostlers, yard equipment, forklifts, yard trucks and tractors, and pallet jacks) used within the project site are zero-emission from start of operations.

e. The property owner/tenant/lessee shall use the cleanest technologies available and provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on-site.

f. At least 30 days prior to applying for building permits, the property owner/tenant/lessee shall submit plans for review and approval of CDD staff, which include the necessary infrastructure for future use of zero emission vehicles, including both heavy-duty and delivery trucks (e.g., installation of conduit specifically designated for truck charging equipment in the future).

g. Idling is strictly prohibited on the subject property and adjacent streets in the Richmond/San Pablo area. The property owner/tenant/lessee shall inform all truck drivers associated with the business of this prohibition.

h. Applicant/tenant/lessee shall periodically sweep the property to remove road dust, tire wear, brake dust and other contaminants in parking lots.

G-21 cont'd

i. Applicant/tenant/lessee shall not use diesel back-up generators on the property unless absolutely necessary. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Applicant/tenant/lessee shall make every effort to utilize emergency back-up generators that meet CARB's Tier 4 emission standards or have the least emissions.

j. The property owner/tenant/lessee shall monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.

k. The operation of Transportation Refrigeration Units (TRUs) is prohibited on the subject site. Any proposed use of TRUs at the subject location will require submittal of a Development Plan modification application.

l. The property owner shall add this Condition of Approval, Air Quality 15, a through l, as part of contractual lease agreement language to ensure the tenant/lessee is informed of all on-going operational responsibilities.

14. Within 30-days of occupancy, applicant/tenant shall demonstrate to the satisfaction of CDD staff, that the required zero emission vehicle requirements are being met.

Solar Power Generation:

15. At least 30-days prior to applying for a building permit, the applicant shall submit evidence to the CDD staff for review and approval, demonstrating that the subject building(s) have been designed to be solar ready by meeting or exceeding the current California Building Code (e.g., structurally able to support solar panels on roofs, appropriately sized electrical panels and conduit, etc.).

16. The project sponsor shall include with the building permit application, sufficient solar panels to provide power for the operation's base power use at the start of operations and as power use demand increases. Project sponsor shall include analysis of (a) projected power requirements at the start of operations and as power demand increases corresponding to the implementation of the "clean fleet" requirements, and (b) generating capacity of the solar installation. G-21 cont'd

    CDD shall verify the size and scope of the solar project based upon the analysis of the projected power requirements and generating capacity as well as the available solar panel installation space.

    In the event sufficient space is not available on the subject lot to accommodate the needed number of solar panels to produce the operation's base or anticipated power use, the applicant shall demonstrate how all available space has been maximized (e.g., roof, parking areas, etc.). Areas which provide truck movement may be excluded from these calculations unless otherwise deemed acceptable by the supplied reports.

    In the event utility provider review/approval delays do not allow installation/operation of the CDD approved solar panels at the time of final building inspection (occupancy), the project sponsor shall provide documentation to the CDD for review and approval, demonstrating how all reasonable and normal efforts have been made to procure the necessary permits and install the solar panels.

17. Prior to issuance of the initial building permit, the applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $500,000 as its fair share contribution

towards the cost of planning and/or constructing a Solar Project for the benefit of the North Richmond area. The Solar Project must benefit North Richmond residents as mitigation for the construction of a warehouse project with its associated emissions and truck traffic. The County will work with the District One Supervisor and the North Richmond Community to define and develop the Solar Project.

Biological Resources:

Nesting Bird Surveys

18. Construction work shall take place outside of the February 15 to September 15 bird nesting seasonal window to the maximum extent practicable. If construction is to be conducted during the nesting season, the project applicant is responsible for ensuring that the project does not result in any violation of the Migratory Bird Treaty Act (MBTA) or Fish and Game Code. A qualified Biologist shall conduct focused pre-construction nesting bird surveys throughout the project area no more than 5 days prior to the initiation of on-site project-related activities. Surveys shall be conducted in all potential habitat located at, and adjacent to, project work sites and in staging and storage areas. The minimum survey radii surrounding the work area will be the following: (1) 250 feet for passerines; and (2) 1,000 feet for raptors such as *Buteo spp.* In the event that there is a lapse in construction activities for 7 days or more, a qualified Biologist shall conduct additional focused pre-construction nesting bird surveys in areas of potential habitat again before project activities can be reinitiated. If an active nest is found, the qualified Biologist may consult with the California Department of Fish and Wildlife (CDFW) if needed regarding appropriate action to comply with the Fish and Game Code.

G-21type cont'd

- **Active Nest Buffers**. Active nest sites and protective buffer zones will be designated as "ecologically sensitive areas" where no project-related activities or personnel may enter (while occupied or in use for the season in the case of multi clutch bearing species) during the course of nesting bird season with the establishment of a fence barrier or flagging surrounding the nest site. The qualified Biologist shall determine the necessary buffer, in consultation with CDFW if needed, to protect nesting birds based on existing site conditions, such as construction activity, topography, and line of sight, and shall increase buffers as needed to provide sufficient protection of nesting birds and their natural behaviors.

- **Active Nests**. A qualified Biologist will observe any identified active nests prior to the start of any project-related activities to establish a behavioral

baseline of the adults and any nestlings. Once project activities commence, all active nests shall be continuously monitored by a qualified Biologist to detect any signs of disturbance and behavioral changes as a result of the project. In addition to direct impacts, such as nest destruction, nesting birds might be affected by noise, vibration, odors and movement of workers or equipment. If signs of disturbance and behavioral changes are observed, the qualified Biologist shall halt project activities causing that change until the nestlings have fledged, and the nest is determined to be inactive. **(MM BIO-1a)**

19. General Minimization Measures
    - **Harassment of Animals**. No project personnel or motorized equipment shall harass, herd, or drive any wildlife. Harass is defined as an intentional act that disrupts an animal's normal behavior patterns, including but is not limited to, breeding, feeding, or sheltering. Project personnel and equipment shall not cause displacement of wildlife into roadways or open areas lacking cover from predators.
    - **Allow Wildlife to Leave Unharmed**. Project staff shall allow any wildlife encountered during the course of project activities to leave the project area unharmed.
    - **Temporary Flagging, Fencing, and Barriers**. The permittee shall remove all temporary flagging, fencing, and/or barriers from the project area upon completion of project activities.
    - **Open Pipes Restriction**. All pipes, culverts, signposts, poles, or similar structures that are staged, stored, or installed at the project area for one or more overnight periods shall be thoroughly inspected for wildlife prior to use in project activities.
    - **Open Trenches**. Wildlife escape ramps shall be installed, constructed of wood, or installed as an earthen slope in each open trench, hole, or pit that is capable of allowing large (e.g., deer, coyote) and/or small (e.g., frogs, snakes) wildlife to escape on their own volition. Open trenches, pits, or holes shall be inspected for wildlife prior to the initiation of project activities each day. If wildlife is discovered, it shall be allowed to leave on its own volition, or if necessary, moved by biological staff if applicable. Special-status species shall not be handled without prior consultation from CDFW.

G-21 cont'd

- **Signpost Restriction**. Signposts installed permanently throughout the course of the project shall have the top capped and/or the top three post holes covered or filled with screws or bolts to prevent the entrapment of wildlife.
- **Fencing Restriction**. All fencing installed temporarily or permanently throughout the course of the project, shall not be constructed of materials deleterious to wildlife (e.g., sharp edges exposed at the top or bottom of chain-link fencing, braided wire where birds may become entangled, etc.). No barbed wire, or equivalent, shall be allowed where it may result in harm to birds and other wildlife.
- **Restriction of Nighttime Construction and Artificial Lighting**. Except for construction activities that involve the pouring of concrete and require the use of nighttime lighting, all other project activities shall be terminated 30 minutes before sunset and shall not resume until 30 minutes after sunrise. The permittee shall use sunrise and sunset times established by the Federal Aviation Administration (FAA) found at: https://avcams.faa.gov/sunrise_sunset.php.

No permanent or unattended temporary outdoor lighting shall be used during the course of construction.

G-21 cont'd

Cultural Resources and Tribal Cultural Resources:

20. Worker Training, Archaeological Monitoring, and Halt Construction Upon Encountering Historical or Archaeological Materials

Prior to the initiation of construction activities, an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology shall provide Worker Environmental Awareness Program (WEAP) training to construction personnel with an overview of applicable laws, project mitigation measures, and procedures to be followed with regards to historical and/or archaeological resources that may be encountered over the course of the project. An Archaeologist should be present to monitor all ground-disturbance activities. In the event a potentially significant historical and/or archaeological resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until an Archaeologist has evaluated the situation. The applicant for the proposed project (CenterPoint Properties) shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Potentially significant cultural resources consist

of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. The Archaeologist shall make recommendations concerning appropriate measures that shall be implemented to protect the resource, including but not limited to excavation and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Any previously undiscovered resources found during construction within the project site shall be recorded on appropriate California Department of Parks and Recreation (DPR) 523 forms and shall be submitted to Contra Costa County Department of Conservation and Development, the Northwest Information Center (NWIC), and the California Office of Historic Preservation (OHP), as required. **(MM CUL-1)**

21. Stop Construction upon Encountering Human Remains

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and Section 5097.98 shall be followed. If during the course of project construction, there is accidental discovery or recognition of any human remains, the following steps shall be taken:

G-21 cont'd

Type te

1. There shall be no further excavation or disturbance within 100 feet of the remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, 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.

2. Where the following conditions occur, the landowner or his or her authorized representative shall work with the Coroner to rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD if available or on the project site or off-site where the reburial would not be subject to further subsurface disturbance:

    - The NAHC is unable to identify an MLD or the MLD failed to make a

recommendation within 48 hours after being notified by the NAHC.

- The descendant identified fails to make a recommendation.
- The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner. **(MM CUL-3)**

22. Native American Construction Monitoring

To minimize the potential for destruction of or damage to existing or previously undiscovered burials, archaeological and Tribal Cultural Resources (TCRs) and to identify any such resources at the earliest possible time during project-related earthmoving activities, the project applicant and its construction contractor(s) shall implement the following measures:

- Native American Monitors from culturally affiliated Native American Tribes shall be invited to monitor the vegetation grubbing, stripping, grading or other ground-disturbing activities in the project area to determine the presence or absence of any cultural resources. Native American representatives from cultural affiliated Native American Tribes shall act as a representative of their Tribal Government and shall be consulted before any cultural studies or ground-disturbing activities begin.

G-21 cont'd

- Native American representatives and Native American Monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted, or slowed if such sites or objects are identified within the direct impact area. Only a Native American representative can recommend appropriate treatment of such sites or objects.
- If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or bone, are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until an Archaeologist who meets the Secretary of the Interior' s qualification standards can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the County, the California Office of Historic Preservation (OHP), and other appropriate agencies. Appropriate treatment measures may include development of avoidance or protection methods, archaeological excavations to recover important information about the resource, research, or other actions determined during consultation. **(MM CUL-4a)**

23. Avoidance and Preservation in place of Tribal Cultural Resources

Should Tribal Cultural Resources (TCRs) be discovered during project construction, avoidance and preservation in place is the preferred manner of mitigating impacts to TCRs and shall be accomplished by several means, including:

- Planning construction to avoid TCRs, archaeological sites and/ or other resources; incorporating sites within parks, green-space, or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity. As noted in Mitigation Measure CUL-4a, appropriate treatment measures may include archaeological excavations to recover information about the resource. Recommendations for avoidance of cultural resources shall be reviewed by the CEQA Lead Agency representative (Contra Costa County), interested Native American Tribes and the appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. If feasible, avoidance and design alternatives may include realignment within the project area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource. Native American representatives from interested Native American Tribes shall be allowed to review and comment on these analyses and shall have the opportunity to meet with the CEQA Lead Agency (Contra Costa County) representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.

G-21 cont'd

- If the resource can be avoided, the construction contractor(s), with Native American Monitors from culturally affiliated Native American Tribes present, shall install protective fencing outside the site boundary, including a buffer area, before construction restarts. The construction contractor(s) shall maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area shall be demarcated as an "Environmentally Sensitive Area." Native American representatives from interested Native American Tribes and the CEQA Lead Agency (Contra Costa County) representative shall

also consult to develop measures for long-term management of the resource and routine operation and maintenance within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional cultural properties and cultural landscapes, in accordance with State and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties); National Park Service Preservation Brief 36 (Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes) and using the Advisory Council on Historic Preservation (ACHP) Native American Traditional Cultural Landscapes Action Plan for further guidance. Use of temporary and permanent form of protective fencing shall be determined in consultation with the Native American representatives from interested Native American Tribes. **(MM CUL-4b)**

Geology and Soils:

G-21 cont'd

24. Prepare Grading and Construction Plans that Incorporate Geotechnical Investigation Recommendations

Prior to issuance of the grading permits for the proposed project, development of the final grading, foundation, and construction plans shall incorporate the site-specific earthwork, foundation, floor slab, finished grades, underground utilities, and pavement design recommendations, as detailed in the Geotechnical Investigation prepared by Cornerstone Earth Group dated August 22, 2018. The applicant shall coordinate with the County Department of Conservation and Development and County Geologist to tailor the grading and foundation plans, as needed, to reduce risk related to known soil and geologic hazards. The final grading, foundation, and construction plans for the proposed project shall be reviewed by the County Department of Conservation and Development and County Geologist. Grading operations shall meet the requirements of the recommendations included in the Preliminary Geotechnical Investigation prepared by Cornerstone Earth Group. During construction, the County Department of Conservation and Development shall monitor construction of the proposed project to ensure the earthwork operations are properly performed. **(MM GEO-1a)**

25. Prepare Final Construction Report

    The Project Geotechnical Engineer shall prepare a final report that documents the field observations and testing services provided during construction as well as provide a professional opinion on the compliance of construction with the recommendations in the Geotechnical Investigation. The final report can be segmented into an as-graded report that is issued at the end of rough grading, but prior to the installation of the foundations, and a second letter commenting on the inspections made during installation of foundations/parking lot/drainage facilities. The County Department of Conservation and Development will place a hard hold on the final inspection, to ensure that the Geotechnical Engineer's grading-foundation inspection letter-report is provided prior to requesting the final building inspection for each building. **(MM GEO-1b)**

Greenhouse Gas Emissions:

26. Prior to the issuance of building permits, the project applicant/developer shall demonstrate (e.g., provide building plans) to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed buildings are designed and will be built to, at minimum, meet the Tier 2 advanced energy efficiency requirements of the Nonresidential Voluntary Measures of the California Green Building Standards Code, Division A5.2, Energy Efficiency, as outlined under Section A5.203.1.2.2. **(MM GHG-1a)**

G-21 cont'd

27. Prior to issuance of occupancy permits, the project applicant/developer shall demonstrate to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed parking areas for passenger automobiles are designed and will be built to accommodate electric vehicle (EV) charging stations. At minimum, the parking shall be designed to accommodate a number of EV charging stations equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2. **(MM GHG-1b)**

28. Prior to issuance of occupancy permits, the project applicant/developer shall demonstrate to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed parking areas for passenger automobiles are designed and will be built to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces for passenger automobiles shall equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.1.2. **(MM GHG-1c)**

29. To reduce idling emissions from transport trucks, which places restrictions on idling, the project applicant/developer shall have signage placed at truck access gates, loading docks, and truck parking areas that clearly notes idling is strictly prohibited on the subject property. In coordination with Contra Costa County, the project applicant/developer shall also place similar signs in the adjacent streets in the Richmond/San Pablo area. At minimum, each sign placed outside the interior premises of the subject property shall note the idling prohibition on the adjacent streets and include telephone numbers of the building facilities manager and the California Air Resources Board (ARB) to report violations. All signage shall be made of weather-proof materials. All site and architectural plans submitted to the Contra Costa County Department of Conservation and Development shall note the locations of these signs. Prior to issuance of occupancy permits, the Contra Costa County Department of Conservation and Development shall verify compliance with these requirements herein. **(MM GHG-1d)**

30. All landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the Contra Costa County Department of Conservation and Development to verify, to the County's satisfaction, that all landscaping equipment utilized will be electric-powered. **(MM GHG-1e)**

31. Prior to the issuance of grading and building permits for the proposed project, the project applicant shall provide Contra Costa County with documentation demonstrating that the rooftop photovoltaic system will satisfy 100 percent of operational electricity consumed by the project, including the electricity demand resulting from the electric vehicle (EV) fleet.

    If the rooftop photovoltaic system will not be able to supply the additional electricity demand resulting from the EV fleet charging requirements, the project applicant shall, prior to the issuance of the certificate of occupancy for the proposed project, provide Contra Costa County with documentation demonstrating that the additional electricity demand will be supplied with 100 percent carbon-free electricity sources. These sources may include, but are not limited to, Pacific Gas and Electric Company (PG&E) 100 Percent Solar Choice electricity service option or Marin Clean Energy's (MCE) Deep Green 100 percent renewable electricity service option. This documentation shall also demonstrate that 100 percent carbon-free electricity sources will be utilized for the first 30 years of operation.

G-21 cont'd

To monitor and ensure that 100 percent of electricity demand generated by the proposed project is supplied with 100 percent carbon-free electricity sources, the project applicant shall maintain records of all electricity consumption and supply associated with the proposed project's operation for five years and make these records available to the County upon request. **(MM GHG-f)**

32. Prior to the issuance of the certificate of occupancy for the proposed project, the project applicant shall provide the County with documentation demonstrating the purchase of voluntary carbon credits pursuant to the following performance standards and requirements: the carbon offsets shall achieve real, permanent, quantifiable, verifiable, additional and enforceable reductions as set forth in California Health and Safety Code Section 38562(d)(1) and (d)(2) and 17 California Code of Regulations § 95802(a); and one carbon offset credit shall mean the past reduction or sequestration of one metric ton (MT) of carbon dioxide equivalent (CO2e) that is "not otherwise required" (CEQA Guidelines § 15126.4(c)(3)). Such credits shall be purchased through a verified greenhouse gas (GHG) emissions credit broker and (i) shall be registered with, and retired by an Offset Project Registry, as defined in 17 California Code of Regulations § 95802(a), approved by ARB, such as, but not limited to the Climate Action Reserve, American Carbon Registry, or Verra, and (ii) shall be subject to protocols that are ARB-approved as required in 17 California Code of Regulations § 95970 (a)(1)-(2). Such credits shall be in an amount sufficient to offset operational GHG emissions of no less than 3,688 MT CO2e per year starting in 2021, 3,384 MT CO2e per year starting in 2023, 530 MT CO2e per year starting in 2025, 371 MT CO2e per year starting in 2027, and 2,205 MT CO2e per year starting in 2045 for the first 30 years of project operations, based on current estimates of the project related GHG emissions. Alternatively, the project applicant may purchase the total amount estimated over the lifetime of the proposed project (30 years), which is estimated to be 35,112 MT CO2e. The purchase shall be verified as occurring prior to approval of occupancy permits. Copies of emission estimates and offset purchase contract(s) shall be provided to the County for review and approval prior to the issuance of the certificate of occupancy for the proposed project.

G-21 cont'd

Should the project applicant fail to meet the County's conditions of approval for the proposed project as described in Chapter 2, Project Description, of the Draft EIR, the project applicant shall recalculate the MT CO2e generated by project operation and purchase carbon credits equal to no less than the amount necessary to ensure that project emissions do not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the first year

of operation (2021), then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2023, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2025, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2027, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. All carbon credits purchased to offset project emissions shall meet the standards and requirements stated in this mitigation measure and documentation proving the purchase of carbon credits which meet these standards and requirements shall be provided to the County for review and approval. **(MM GHG-1g)**

G-21 cont'd

33. Prior to issuance of the initial building permit, the applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $500,000 as its fair share contribution towards the cost of funding an air quality improvement related project(s) for the benefit of the North Richmond area. The project(s) must benefit sensitive receptors within the North Richmond area as mitigation for the construction of a warehouse project with its associated emissions and truck traffic. The County will work with the District One Supervisor and the North Richmond Community to fund the project(s).

Hazards and Hazardous Materials:

34. Prepare Soil Management Plan and Health and Safety Plan

Prior to issuance of grading permits, the applicant shall retain a licensed professional to prepare and submit a Soil Management Plan and Health and Safety Plan for review and approval by Contra Costa Environmental Health. These plans shall include the following:

- Site control procedures to control the flow of personnel, vehicles, and materials in and out of the project site.
- Measures to minimize dust generation, stormwater runoff, and tracking soil off-site.
- If excavation de-watering is required, protocols to evaluate water quality and discharge/disposal alternative should be described.
- Protocols for conducting earthwork activities in areas where impacts soil, soil vapor, and/or groundwater are present or suspected. Worker training requirements, health and safety measures, and soil handling procedures shall be described.
- Protocols to be implemented if buried tanks, structures, wells, debris, or unidentified areas of impacted soils are encountered during construction activities.
- Protocols to evaluate the quality of soil suspected of being contaminated so that appropriate mitigation, disposal or reuse alternatives, if necessary, can be determined.
- Procedures to evaluate and document the quality of any soil imported to the project site. Soil containing chemicals exceeding residential (unrestricted use) screening levels or typical background concentrating of metals should not be accepted.
- Methods to monitor excavations for the potential presence of volatile chemical vapors. **(MM HAZ-1)**

G-21 cont'd

Hydrology and Water Quality:

35. Prepare Final Drainage Plan Prior to Grading

- In accordance with Division 914 of the Contra Costa County Ordinance Code, the project applicant shall collect and convey all stormwater entering and/or originating on this property, without diversion and within an adequate storm drainage facility, to a natural watercourse having definable bed and banks, or to an existing adequate public storm drainage system that conveys the stormwater to a natural watercourse. Any proposed diversions of the watershed shall be subject to hearing body approval. Prior to issuance of a grading permit, the applicant shall submit improvement plans for proposed drainage improvements, and a drainage report with hydrology and hydraulic calculations to the Engineering Services Division of the Public Works Department for review and approval that demonstrates the adequacy of the on-site drainage system and the downstream drainage system. The applicant shall verify the adequacy at any downstream drainage facility accepting stormwater from this project prior to discharging runoff. If the downstream system(s) is not adequate to handle the Existing Plus Project condition for the required design storm, improvements shall be constructed to make the system adequate. The applicant shall obtain access rights to make any necessary improvements to off-site facilities.

G-21 cont'd

- In accordance with Division 1014 of the Contra Costa County Ordinance Code, the applicant shall comply with all rules, regulations, and procedures of the National Pollutant Discharge Elimination System (NPDES) for municipal, construction and industrial activities as promulgated by the California State Water Resources Control Board, or any of its Regional Water Quality Control Boards (San Francisco Bay—Region 2); and

- Submit a Final Stormwater Control Plan and a Stormwater Control Operation and Maintenance Plan (O&M Plan) to the Public Works Department, which shall be reviewed for compliance with the County's NPDES Permit and shall be deemed consistent with the County's Stormwater Management and Discharge Control Ordinance (Division 1014) prior to issuance of a building permit. Improvement Plans shall be reviewed to verify consistency with the Final Stormwater Control Plan and compliance with the Contra Costa Stormwater C.3 Guidebook of the County's NPDES Permit and the County's Stormwater Management and Discharge Control Ordinance (Division 1014) and be designed to discourage prolonged standing/ponding of water on-site. **(MM HYD-3)**

Noise:

36. Implement Noise Reduction Measures During Construction

    - The construction contractor shall ensure that grading activities shall be restricted to the hours between 7:30 a.m. and 5:30 p.m., Monday through Friday. **(MM NOI-1)**

Transportation:

37. Prior to issuance of the certificate of occupancy, the applicant shall retain a qualified transportation consultant to prepare a project-specific Transportation Demand Management (TDM) Program that could incorporate the following measures, where feasible. The TDM Program shall be reviewed and approved by the County, and the applicant shall implement all approved TDM measures.

    - Commute Trip Reduction Program
    - Ride-sharing Program
    - End of Trip Facilities
    - Last Mile Services
    - New Employee Commute Orientation
    - Preferential Parking Program
    - Employer-Sponsored Vanpool
    - Transportation Network Company (TNC) Partnership
    - Employer-Sponsored Shuttle to/from BART Station(s) or Other Transit Hub
    - Carpool and Vanpool Ride-Matching Services **(MM TRANS-1)**

38. Prior to issuance of the certificate of occupancy for the proposed project, the applicant shall install a median and bulb-outs on Fred Jackson Way along the project frontage, stop signs at the project driveways, and signage prohibiting vehicles from turning left out of the project driveways. **(MM TRANS-2a)**

39. Prior to issuance of the building permit, the applicant shall (1) pay the North Richmond Area of Benefit (AOB) fee and (2) commit to installing one of the following improvements on Fred Jackson Way, Market Avenue, or Chesley Avenue prior to project occupancy:

    - Bulb-outs
    - Elevated crosswalks
    - Speed tables
    - Chicanes **(MM TRANS-2b)**

G-21 cont'd

40. Prior to the issuance of the certificate of occupancy, the applicant shall install curb ramps where required at all pedestrian walkways and pedestrian connections between the three buildings. The applicant shall install pedestrian crossings on all four approaches of Fred Jackson Way and Brookside Drive (including ADA-compliant pedestrian landing islands). The applicant shall install pedestrian crossings on all four approaches of Fred Jackson Way and Pittsburg Avenue (including ADA-compliant pedestrian landing islands). **(MM TRANS-4a)**

41. Prior to the issuance of the certificate of occupancy, the applicant shall install long-term bicycle parking consistent with County Code Section 82-16.412 and other bicycle amenities (showers, changing rooms, bike repair tools/station, etc.) in a convenient location. **(MM TRANS-4b)**

Landscaping:

42. Final Landscaping Plan: At least 30 days prior to CDD stamp-approval of plans for issuance of a building permit, a final landscape and irrigation plan shall be submitted to the CDD for review and approval. The landscaping plan shall conform to the State's Model Water Efficient Landscape Ordinance or the County's Ordinance, if one is adopted. Prior to requesting a final inspection, the approved landscaping shall be installed and evidence of the installation (e.g., photos) shall be provided for the review and approval of CDD.

G-21 cont'd

43. Restitution for the removal of (7) code-protected tree:

    a. Planting and Irrigation Plan: Prior to issuance of a grading or building permit, whichever occurs first, the applicant shall submit a tree planting and irrigation plan prepared by a licensed arborist or landscape architect for the review and approval of the Department of Conservation and Development, Community Development Division (CDD). *See the North Richmond Design Guidelines for species and size requirements.*

    b. Required Security to Assure Completion of Plan Improvements: A security shall be provided to ensure that the approved planting and irrigation plan is implemented. Prior to issuance of a building permit, the applicant shall submit a security that is acceptable to the CDD.

44. The Final Landscaping Plan shall include sufficient plantings along the southern property boundary to establish a vegetative screening aimed at blocking dust and particulate matter from migrating southward unabated. The vegetative screening shall include fast growing, tall species (e.g., Italian and Leyland cypress) with a density that will accomplish the goal of capturing the maximum amount of dust and particulate matter feasible (e.g., two or three rows of trees

offset from one another and appropriately spaced).

45. Any proposed tree alteration, removal, or encroachment within a drip line of code-protected trees that are not identified with this permit approval will require submittal of a Tree Permit application for review and consideration by CDD.

46. The applicant shall comply with California Model Water Efficient Landscape Ordinance (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495) and/or any applicable State mandated landscape/water related requirements applicable at the time of landscaping installation for the project. To the maximum extent feasible, the project proponent shall use drought tolerant vegetation for the development.

    Project sponsors should be aware that Section 31 of the East Bay Municipal Utility District's (EBMUD) Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense. Any questions regarding these requirements can be directed to EBMUD Water Service Planning at (510) 287-1365.

G-21 cont'd

General Construction:

Construction Period Restrictions and Requirements

47. During construction, the following mitigation measures shall be implemented:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.

- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Bay Area Air Quality Management District (BAAQMD) phone number shall also be visible to ensure compliance with applicable regulations.

48. Implement the following Emission Reduction Measures into the final design of the project:

- The project sponsor shall require their contractor and subcontractors to fit all internal combustion engines with mufflers which are in good condition.

- A dust and litter control program shall be submitted for the review and approval of the Community Development Division staff. Any violation of the approved program or applicable ordinances shall require an immediate work stoppage. Construction work shall not be allowed to resume until, if necessary, an appropriate construction bond has been posted.

- The applicant shall make a good-faith effort to avoid interference with existing neighborhood traffic flow.

- Transporting of heavy equipment and trucks shall be limited to weekdays between the hours of 8:30 A.M. and 4:30 P.M. and prohibited on Federal and State Holidays.

- The site shall be maintained in an orderly fashion. Following the cessation of construction activity, all construction debris shall be removed from the site.

- All construction activities shall be limited to the hours of 7:00 A.M. to 6:00

G-21 cont'd

P.M., Monday through Friday, and shall be prohibited on state and federal holidays on the calendar dates that these holidays are observed.

- Prohibit unnecessary idling of internal combustion engines.
- Locate stationary noise generating equipment as far from surrounding residential properties as possible.
- Saturday work may be permissible upon review and approval by CDD staff of a written request by the contractor/developer indicating the circumstances warranting such Saturday work and the nature of the work to be performed.

Debris Recovery:

49. At least 15 days prior to the issuance of a building permit the developer shall demonstrate compliance with the debris recovery program, which requires at least 50 percent of the jobsite debris generated by construction projects of 5,000 square feet or greater to be recycled, or otherwise diverted from landfill disposal.
50. Dumpsters or refuse areas shall be screened from view from any roadway.
51. The Development Plan application was subject to an initial deposit of $116,880.80 that was paid with the application submittal, plus time and material costs if the application review expenses exceed the initial deposit. Any additional fee due must be paid prior to issuance of a building permit, or 60 days of the effective date of this permit, whichever occurs first. The fees include costs through permit issuance and final file preparation. Pursuant to Contra Costa County Board of Supervisors Resolution Number 2013/340, where a fee payment is over 60 days past due, the application shall be charged interest at a rate of ten percent (10%) from the date of approval. The applicant may obtain current costs by contracting the project planner. A bill will be mailed to the applicant shortly after permit issuance in the event that additional fees are due.

G-21 cont'd

PUBLIC WORKS CONDITIONS OF APPROVAL FOR PERMIT CDDP18-03007 and SUBDIVISION CDMS19-00009

Applicant shall comply with the requirements of Title 8, Title 9 and Title 10 of the Ordinance Code. Any exception(s) must be stipulated in these Conditions of Approval. Conditions of Approval are based on the site plan submitted to the Department of Conservation and Development on August 28, 2018 and Tentative Map received October 29, 2019.

UNLESS OTHERWISE SPECIFIED, COMPLY WITH THE FOLLOWING CONDITIONS OF APPROVAL PRIOR TO ISSUANCE OF A BUILDING PERMIT.

General Requirements:

52. Improvement plans prepared by a registered civil engineer shall be submitted to the Public Works Department, Engineering Services Division, along with review and inspection fees, and security for all improvements required by the Ordinance Code or the conditions of approval of this permit. Any necessary traffic signing and striping shall be included in the improvement plans for review by the Transportation Engineering Division of the Public Works Department.

53. The Parcel Map merging the underlying properties into three parcels shall be approved by the County Board of Supervisors and filed at the County Recorder's Office.

Roadway Improvements:

Fred Jackson Way

G-21 cont'd

54. Applicant shall construct curb, 8-foot wide concrete sidewalk (exclusive of curb width if constructed monolithically) street lights, longitudinal and transverse drainage infrastructure, stormwater management facilities, signage, striping and pavement conforms to existing improvements. In general, the face of curb for these improvements shall be 32-feet east of the ultimate centerline of Fred Jackson Way.

55. The project is limited to a total of three driveways along the Fred Jackson Way frontage: a main driveway opposite the intersection at Pittsburg Avenue, one between Pittsburg Avenue and Brookside Drive, and one between Pittsburg Avenue and Da Villa Road. Driveways designated for truck access shall be 40-50 feet wide. All others shall be 26 feet wide. Exact location of these northern and southern driveways are subject to review and approval of Public Works.

56. Install curb bulb-outs at the intersection of Pittsburg Avenue, as well as "pork chop" medians and signage near the driveways left-turnout movements from the project site to direct traffic north along Fred Jackson Way or west along Pittsburg Avenue toward Richmond Parkway. **MM TRANS-2a, MM TRANS-2b**

57. Install traffic signals at the intersections of Fred Jackson Way with both Brookside Drive and Pittsburg Avenue. The traffic signal at the Brookside Drive intersection shall allow full turning movements at all approaches. The signal at Pittsburg Avenue will include a separate southbound to west bound right turn

lane, permitted left turns on the northbound and southbound approaches and split phases on the eastbound and westbound approaches. The applicant shall install pedestrian crossings on all four approaches of both signalized intersections, including ADA-compliant pedestrian landing islands as applicable. Construction costs for installation of these signals would be credited against the project's North Richmond AOB fee obligation. **MM TRANS-4**

58. The applicant shall submit a preliminary "sketch" plan to the Public Works Department for review showing all required improvements to the Fred Jackson Way frontage, signalized intersections and nearby offsite County roadway conforms. The sketch plan shall be to scale, show horizontal alignments, transitions, curb lines, and lane striping. It shall provide sight distance at the project driveways for a design speed of 40 miles per hour. Truck turning exhibits should also be included to show accessibility to/from project driveways and potential turning movement conflicts. The plan shall extend a minimum of 175 feet beyond the limits of the proposed work. Final alignment and driveway locations will be subject to Public Works approval based on compatibility with existing and proposed right of way dedications and improvements on adjacent and nearby properties.

G-21 cont'd

Brookside Drive

59. Applicant shall construct curb, minimum 5-foot sidewalk (excluding width of curb), necessary longitudinal and transverse drainage, stormwater management facilities, street lighting, signage striping, pavement widening and transitions along the entire project frontage of Brookside Drive. Applicant shall construct face of curb 20 feet from the ultimate road centerline.

60. The project is limited to a total of three driveways along Brookside Drive frontage Driveways designated for truck access shall be 40-50 feet wide. All others shall be 26 feet wide. Exact location of these driveways are subject to review and approval of Public Works. Driveways shall incorporate signage and turn restrictions to discourage cut through traffic in residential neighborhoods.

61. The applicant shall submit a preliminary "sketch" plan to the Public Works Department for review showing all required improvements to the Brookside Drive frontage and nearby offsite conforms. Format of said "Plan" shall be as described above relative to Fred Jackson Way.

Off-Site Traffic Mitigation

62. In 2017, the North Richmond Area of Benefit (AOB) traffic mitigation fee program was updated to require new developments within North Richmond to

contribute towards traffic calming strategies to reduce cut-through truck traffic in the neighborhood. Pursuant to Mitigation Measure TRANS-2b, the applicant will be required to develop traffic calming measures for review and approval by the Public Works Department, execute an agreement and post security to construct the identified improvement(s) prior to filing the Parcel Map for the project. The cost of the off-site traffic calming improvements would be counted as work completed and would be provided credit towards the North Richmond AOB fee obligation. As noted above, the two signals required along Fred Jackson Way will be credited to this obligation.

Miscellaneous

63. Any cracked and displaced curb, gutter, and sidewalk within the project's limits of work shall be removed and replaced. Concrete shall be saw cut prior to removal. Existing lines and grade shall be maintained. New curb and gutter shall be doweled into existing improvements.

Access to Adjoining Property:

Proof of Access

G-21 cont'd

64. Applicant shall furnish proof to the Public Works Department of the acquisition of all necessary rights of way, rights of entry, permits and/or easements for the construction of off-site, temporary or permanent, public and private road and drainage improvements.

65. Applicant shall furnish proof to the Public Works Department that legal access to the property is available from Fred Jackson Way and Brookside Drive.

Encroachment Permit

66. Applicant shall obtain an encroachment permit from the Application and Permit Center, if necessary, for construction of improvements within the right of way of Fred Jackson Way, Brookside Drive and Pittsburg Avenue.

Abutter's Rights:

67. Applicant shall restrict access along the Fred Jackson Way and Brookside Drive frontages of this property, with the exception of the access points shown on the applicant's site plan, as specifically approved under these conditions of approval. Owner shall relinquish abutter's rights of access along both frontages with the exception of the access points shown.

Road Dedications:

68. Property Owner shall convey to the County, by Offer of Dedication, a minimum of ten feet of right of way along the entire Brookside Drive frontage for the planned future half-width of 30 feet from the ultimate centerline. Additional right of way may be necessary to accommodate public utilities.

69. If the applicant opts to separate public street stormwater runoff from the on-site runoff by constructing dual stormwater management facilities, the infrastructure associated with runoff from the public right of way may necessitate additional right of way along Fred Jackson Way and/or Brookside Drive. Property Owner shall convey to the County, by Offer of Dedication, any additional right-of-way necessary for operation and maintenance of stormwater management facilities associated with treatment of runoff from the public right of way.

Access & Utility Easements:

70. Proposed Private Access and Utility Easements between the three subdivision parcels should be delineated on the Parcel Map to provide for internal circulation and access to common driveways and utilities. G-21 cont'd

Da Villa Road

71. Owner shall grant a (generally) 15-foot wide Access and Utility Easement ("PAUE") to the property currently identified as Assessors' Parcel No. 409-300-002 (541 Da Villa Road). Said easement shall lie contiguous to the south property line of the project site (coincident with the north line of the Da Villa Road) and extend from the grantee's property westerly to Fred Jackson Way. To eliminate angle points in the easement, additional easement area may be required to create a centerline alignment for what will effectively be a 40-foot wide Da Villa Road easement that conforms to County collector road standards.

72. Coincident with the above PAUE, owner shall dedicate a non-exclusive Access and Drainage Easement to the Contra Costa County Flood Control and Water Conservation District ("District") to supplement the District's existing access along Da Villa Road and encumber any portions of Line A of Drainage Area 19A to be constructed by this project.

Countywide Street Light Financing:

73. Applicant shall annex to the Community Facilities District (CFD) 2010-1 formed for Countywide Street Light Financing.

Landscaping:

74. If applicable, the applicant shall install and guarantee all SWCP landscaping and automatic irrigation facilities within the public-right-of-way, to be maintained by the County. The landscape facilities shall be maintained by the developer: a) for a minimum of 180 days after installation and b) until the plants have become established.

75. If applicable, the applicant shall submit four sets of landscape and automatic irrigation plans and cost estimates, prepared by a licensed landscape architect, for all SWCP landscaping and automatic irrigation facilities to be maintained by the County to the Public Works Department for review approval, prior to issuance of building permits. Applicant shall pay appropriate fees in accordance with County Ordinance. Landscaping shall meet the requirements of the Contra Costa County Public Works Department Landscaping Design, Construction and Maintenance standards and Guidelines for County Maintained Facilities.

76. All landscaping to be maintained by the property owner shall be submitted to the CDD for review and approval.

77. Applicant shall apply to the Public Works Department for annexation to the Community Facilities District (CFD) No. 2006-1 (North Richmond Area Maintenance Services) for the future maintenance of area wide medians and landscaping. The annexation of property into the CFD must be completed prior to occupancy and the applicant should be aware that the annexation process may take approximately 60 days.

G-21 cont'd

Pedestrian Access:

78. Applicant shall design all public and private pedestrian facilities in accordance with Title 24 (Handicap Access) and the Americans with Disabilities Act. This shall include all sidewalks, paths, driveway depressions, and curb ramps.

79. Curb ramps and driveways shall be designed and constructed in accordance with current County standards. A detectable warning surface (e.g. truncated domes) shall be installed on all curb ramps. Adequate right-of-way shall be dedicated at the curb returns to accommodate the returns and curb ramps; accommodate a minimum 4-foot landing on top of any curb ramp proposed.

Parking:

80. "No Parking" signs shall be installed along Fred Jackson Way and Brookside Drive subject to the review of the Public Works Department and the review and approval of the Board of Supervisors.

Utilities/Undergrounding:

81. Applicant shall underground all new and existing utility distribution facilities, including those along the frontage of Fred Jackson Way and Brookside Drive, including the remnant of the overhead utilities on the north side of Brookside Drive east of Fred Jackson Way. The developer shall provide joint trench composite plans for the underground electrical, gas, telephone, cable television and communication conduits and cables including the size, location and details of all trenches, locations of building utility service stubs and meters and placements or arrangements of junction structures as a part of the Improvement Plan submittals for the project. The composite drawings and/or utility improvement plans shall be signed by a licensed civil engineer.

Drainage Improvements:

Collect and Convey

82. The applicant shall collect and convey all stormwater entering and/or originating on this property, without diversion and within an adequate storm drainage system, to *an adequate* natural watercourse having definable bed and banks, or to an existing adequate public storm drainage system which conveys the stormwater to *an adequate* natural watercourse, in accordance with Division 914 of the Ordinance Code. G-21 cont'd

    The nearest public drainage facilities are Lines A and B of Drainage Area 19A located along the west side of Fred Jackson Way that will convey stormwater run-off from the site to the Wildcat Creek and San Pablo Creek respectively. The Drainage Study included in the DEIR and supplemental documentation reviewed by Public Works indicates these lines have sufficient capacity to satisfy the Ordinance Code requirements. Staff concurs with this preliminary analysis, pending final assessment in conjunction with review of the final construction drawings and documents. **MM HYD-3**

Miscellaneous Drainage Requirements:

83. Applicant shall prevent storm drainage from draining across the sidewalk(s) and driveway(s) in a concentrated manner.

84. Private storm drain easements conforming to the width specified in Section 914-14.004 of the County Ordinance Code, shall be conveyed across any storm drain conveyance or management facilities that serve more than one parcel.

85. Applicant shall dedicate Public Storm Drain Easements over any portions of Lines A or B (DA 19A) that traverse the project site that are not otherwise

encumbered in the easement dedicated to the District for the widening of Da Villa Road as described above.

National Pollutant Discharge Elimination System (NPDES):

86. The applicant shall be required to comply with all rules, regulations, and procedures of the National Pollutant Discharge Elimination System (NPDES) for municipal, construction, and industrial activities as promulgated by the California State Water Resources Control Board, or any of its Regional Water Quality Control Boards (San Francisco Bay –Region II).

    Compliance shall include developing long-term best management practices (BMPs) for the reduction or elimination of storm water pollutants. The project design shall incorporate wherever feasible, the following long-term BMPs in accordance with the Contra Costa Clean Water Program for the site's storm water drainage:

    - Minimize the amount of directly connected impervious surface area.
    - Install approved full trash capture devices on all catch basins (excluding catch basins within bioretention basins) as reviewed and approved by Public Works Department. Trash capture devices shall meet the requirements of the County's NPDES permits.
    - Place advisory warnings on all catch basins and storm drains using current storm drain markers.
    - Construct concrete driveway weakened plane joints at angles to assist in directing run-off to landscaped/pervious areas prior to entering the street curb and gutter.
    - Filtering Inlets.
    - The applicant shall sweep the paved portion of the site at least once a year between September 1st and October 15th utilizing a vacuum type sweeper. Verification (invoices, etc.) of the sweeping shall be provided to the County Clean Water Program Administrative Assistant at 255 Glacier Drive, Martinez, CA 94553; (925)313-2238.
    - Trash bins shall be sealed to prevent leakage, OR, shall be located within a covered enclosure.
    - Other alternatives comparable to the above as approved by the Public Works Department. **MM HYD-1**

G-21 cont'd

Stormwater Management and Discharge Control Ordinance:

87. The applicant shall submit a FINAL Storm Water Control Plan (SWCP) and a Stormwater Control Operation and Maintenance Plan (O+M Plan) to the Public Works Department, which shall be reviewed for compliance with the County's National Pollutant Discharge Elimination System (NPDES) Permit and shall be deemed consistent with the County's Stormwater Management and Discharge Control Ordinance (§1014) prior to issuance of certificate of occupancy. To the extent required by the NPDES Permit, the Final Stormwater Control Plan and the O+M Plan will be required to comply with NPDES Permit requirements that have recently become effective that may not be reflected in the preliminary SWCP and O+M Plan. All time and materials costs for review and preparation of the SWCP and the O+M Plan shall be borne by the applicant. **MM HYD-3**

    - Improvement Plans shall be reviewed to verify consistency with the final SWCP and compliance with Provision C.3 of the County's NPDES Permit and the County's Stormwater Management and Discharge Control Ordinance (§1014).
    - Stormwater management facilities shall be subject to inspection by Public Works Department staff; all time and materials costs for inspection of stormwater management facilities shall be borne by the applicant.
    - Prior to filing the Parcel Map the property owner(s) shall enter into a standard Stormwater Management Facility Operation and Maintenance Agreement with Contra Costa County, in which the property owner(s) shall accept responsibility for and related to operation and maintenance of the stormwater facilities, and grant access to relevant public agencies for inspection of stormwater management facilities.
    - Prior to filing the Parcel Map the property owner(s) shall annex the subject property into Community Facilities District (CFD) No. 2007-1 (Stormwater Management Facilities), which funds responsibilities of Contra Costa County under its NPDES Permit to oversee the ongoing operation and maintenance of stormwater facilities by property owners.
    - Any proposed water quality features that are designed to retain water for longer than 72 hours shall be subject to the review of the Contra Costa Mosquito & Vector Control District.

G-21 cont'd

Area of Benefit Fee Ordinance:

88. The applicant shall comply with the requirements of the Bridge/Thoroughfare Fee Ordinance for the WCC Transit/Pedestrian, WCCTAC Bridge/Road, and North Richmond Areas of Benefit as adopted by the Board of Supervisors. These fees will be collected prior to issuance of building permits on this site.

89. Prior to constructing any public improvements, the applicant, shall contact Public Works Department to determine the extent of any eligible credits or reimbursements against the area of benefit fees.

Drainage Area Fee Ordinance:

90. The applicant shall comply with the drainage fee requirements for Drainage Area 19A as adopted by the Board of Supervisors prior to initiation of the use requested with this application.

91. Certain improvements required by the Conditions of Approval for this development or the County Subdivision Ordinance may be eligible for credit or reimbursement against the drainage area fee. The developer should contact the Public Works Department to determine the extent of any credit or reimbursement for which the developer may be eligible. Any credit or reimbursements shall be determined prior to issuance of a Building Permit or as approved by the Flood Control District.

G-21 cont'd

ADVISORY NOTES

ADVISORY NOTES ARE NOT CONDITIONS OF APPROVAL; THEY ARE PROVIDED TO ALERT THE APPLICANT TO ADDITIONAL ORDINANCES, STATUTES, AND LEGAL REQUIREMENTS OF THE COUNTY AND OTHER PUBLIC AGENCIES THAT MAY BE APPLICABLE TO THIS PROJECT.

A. NOTICE OF OPPORTUNITY TO PROTEST FEES, ASSESSMENTS, DEDICATIONS, RESERVATIONS OR OTHER EXACTIONS PERTAINING TO THE APPROVAL OF THIS PERMIT.

Pursuant to California Government Code Section 66000, et seq., the applicant has the opportunity to protest fees, dedications, reservations or exactions required as part of this project approval. To be valid, a protest must be in writing pursuant to Government Code Section 66020 and must be delivered to the Community Development Division within a 90-day period that begins on the date that this project is approved. If the 90th day falls on a day that the Community Development Division is closed, then the protest must be submitted by the end of the next business day.

B. The applicant may be required to comply with the requirements of the Bridge/Thoroughfare Fee Ordinance for the North Richmond, West Contra Costa

Transportation Advisory Committee (WCCTAC) Bridges/Roads, and WCCTAC Transit/Pedestrian Areas of Benefit Area of Benefit as adopted by the Board of Supervisors.

C. This project may be subject to the requirements of the Department of Fish and Wildlife. It is the applicant's responsibility to notify the California Department of Fish and Wildlife, Bay Delta Region (Region 3), 825 Cordelia Road, Suite 100, Fairfield, CA 94534 of any proposed construction within this development that may affect any fish and wildlife resources, per the Fish and Wildlife Code.

D. This project may be subject to the requirements of the Army Corps of Engineers. It is the applicant's responsibility to notify the appropriate district of the Corps of Engineers to determine if a permit is required, and if it can be obtained.

E. Prior to applying for a building permit, the applicant is strongly encouraged to contact the following agencies to determine if additional requirements and/or additional permits are required as part of the project:

- Contra Costa County Building Inspection Division
- Contra Costa County Grading Division
- Contra Costa County Environmental Health Division
- Contra Costa County Consolidated Fire Protection District
- East Bay Municipal Utility District
- West County Wastewater District
- LAFCO
- City of Richmond
- DTSC

G-21 cont'd

Appendix E

XAVIER BECERRA
Attorney General

State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's comment letters, collecting knowledge gained from the Bureau's review of hundreds of warehouse projects across the state. It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[3] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, the overwhelming majority of which have been adapted from actual warehouse projects in California.

G-22

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[4] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. For example, in 2014, 40 percent of national container cargo flowed through Southern California, which was home to nearly 1.2 billion square feet of warehouse facilities.[5] In the Inland Empire alone, 150 million square feet of new industrial space was built over the last decade,[6] and 21 of the largest 100 logistics leases signed in 2019 nationwide were in the Inland

[1] https://oag.ca.gov/environment/justice.
[2] https://oag.ca.gov/environment/ceqa/letters; *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).
[3] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.
[4] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short or long term basis for later distribution to businesses and/or retail customers.
[5] Industrial Warehousing in the SCAG Region, Task 2. Inventory of Warehousing Facilities (April 2018), http://www.scag.ca.gov/Documents/Task2_FacilityInventory.pdf at 1-1, 2-11.
[6] Los Angeles Times, *When your house is surrounded by massive warehouses*, October 27, 2019, https://www.latimes.com/california/story/2019-10-27/fontana-california-warehouses-inland-empire-pollution.

Empire, comprising 17.5 million square feet.[7] This trend has not slowed, even with the economic downturn caused by COVID-19, as e-commerce has continued to grow.[8] Forecasts predict that the Central Valley is where a new wave of warehouse development will go.[9]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_X)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[10] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[11] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents. These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts.

G-22 cont'd

[7] CBRE, *Dealmakers: E-Commerce & Logistics Firms Drive Demand for Large Warehouses in 2019* (January 23, 2020), https://www.cbre.us/research-and-reports/US-MarketFlash-Dealmakers-E-Commerce-Logistics-Firms-Drive-Demand-for-Large-Warehouses-in-2019; *see also* CBRE, *E-Commerce and Logistics Companies Expand Share Of Largest US Warehouse Leases, CBRE Analysis Finds* (Feb. 25, 2019), https://www.cbre.us/about/media-center/inland-empire-largest-us-warehouse-leases (20 of the largest 100 warehousing leases in 2018 were in the Inland Empire, comprising nearly 20 million square feet).

[8] CBRE, 2021 U.S. Real Estate Market Outlook, Industrial & Logistics, https://www.cbre.us/research-and-reports/2021-US-Real-Estate-Market-Outlook-Industrial-Logistics; Kaleigh Moore, *As Online Sales Grow During COVID-19, Retailers Like Montce Swim Adapt And Find Success*, FORBES (June 24, 2020), *available at* https://www.forbes.com/sites/kaleighmoore/2020/06/24/as-online-sales-grow-during-covid-19-retailers-like-montce-swim-adapt-and-find-success/.

[9] New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[10] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (DPM).

[11] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically address warehouse development, we encourage governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and guide sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take any number of forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors can help avoid conflicts between warehouse facilities and residential communities.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[12]

G-22 cont'd

The Bureau is aware of four good neighbor policies in California: Riverside County, the City of Riverside, the City of Moreno Valley, and the Western Riverside Council of Governments.[13] These policies provide minimum standards that all warehouses in the jurisdiction must meet. For example, the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors, and it requires a number of design features to reduce truck impacts on nearby sensitive receptors. The Riverside County policy requires vehicles entering sites during both construction and operation to meet certain California Air Resources Board (CARB) guidelines, and it requires community benefits agreements and supplemental funding contributions toward additional pollution offsets.

The Bureau encourages jurisdictions to adopt their own local ordinances and/or good neighbor policies that combine the most robust policies from those models with measures discussed in the remainder of this document.

---

[12] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.

[13] https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (Riverside County); https://riversideca.gov/planning/pdf/good-neighbor-guidelines.pdf (City of Riverside); http://qcode.us/codes/morenovalley/view.php?topic=9-9_05-9_05_050&frames=on (City of Moreno Valley); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (Western Riverside Council of Governments).

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The information should be in a format that is easy to navigate and understand for members of the affected community.
- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community relations officer to the surrounding community.

G-22 cont'd

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local

communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[14]
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

G-22 cont'd

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers

[14] California Air Resources Board (CARB), Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted under varying scenarios; this document may be found on CARB's website and is entitled: "California Sustainable Freight Initiative: Concept Paper for the Freight Handbook" (December 2019).

5

should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as regulations tighten and demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation. CEQA Guidelines § 15369.
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is a baseline expectation.
- Fully analyzing impacts from truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin. Emissions beyond the air basin are not speculative, and, because air pollution is not static, may contribute to air basin pollution. Moreover, any contributions to air pollution outside the local air basin should be quantified and their significance should be considered.
- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

G-22 cont'd

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable

bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.
- Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

G-22 cont'd

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all

7

dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.

- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.

G-22 cont'd

8

- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

G-22 cont'd

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if

truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

G-22 cont'd

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.

- Using full cut-off light shields and/or anti-glare lighting.
- Using cool pavement to reduce heat island effects.
- Installing climate control in the warehouse facility to promote worker well-being.
- Installing air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

G-22 cont'd

Appendix F

SUGGESTED MITIGATION MEASURES

Measures Related to Building and Site Design

1. Prior to the issuance building permits for the proposed project, the building permit applicant/developer shall provide the City with documentation demonstrating that one or more photovoltaic systems will satisfy 100 percent of operational electricity consumed by the proposed project building(s), including the electricity demand resulting from the associated electric vehicle (EV) fleet. The photovoltaic system shall include a battery storage system to serve the facility in the event of a power outage to the extent required by the 2022 or later California Building Standards Code.

   The developer or tenant, or qualified solar provider engaged by the developer or tenant, shall: (1) include an application to construct this photovoltaic system(s) with its building permit application for the proposed project building(s), (2) submit an interconnection application for the system to the utility prior to submitting the building permit application and diligently respond to any requests for additional information or studies by the utility and timely submit all required documents for the utility to continue to process the application to approval, and (3) order the PV panels prior to submitting the building permit application. G-23

   The developer or tenant, or qualified solar provider engaged by the developer or tenant shall install the system when the City has approved building permits and the necessary equipment has arrived. The developer or tenant shall commence operation of the system when it has received permission to operate from the utility. The photovoltaic system owner shall be responsible for maintaining the system(s) at not less than 80% of the rated power for 20 years. At the end of the 20-year period, the building owner shall install a new photovoltaic system meeting the capacity and operational requirements of this measure, or continue to maintain the existing system, for the life of the project.

   If the photovoltaic system will not be able to supply the additional electricity demand resulting from the EV fleet charging requirements, the applicant shall, prior to the issuance of the certificate of occupancy for the proposed project, provide the City with documentation demonstrating that the additional electricity demand will be supplied with 100 percent carbon-free electricity sources. These sources may include, but are not limited to, Pacific Gas and Electric Company (PG&E) 100 Percent Solar Choice electricity service option. This documentation shall also demonstrate that 100 percent carbon-free electricity sources will be utilized for the first 30 years of operation.
2. To monitor and ensure that 100 percent of electricity demand generated by the proposed project is supplied with 100 percent carbon-free electricity sources, the applicant shall maintain records of all electricity consumption and supply associated with the proposed project's operation for five years and make these records available to the City and to the public upon request.
3. Project construction shall be subject to all adopted City building codes, including the adopted Green Building Standards Code, version July 2022 or later. Prior to the issuance

of building permits, the applicant/developer shall demonstrate (e.g., provide building plans) that the proposed buildings are designed and will be built to Leadership in Energy and Environmental Design (LEED) Silver standards. Within 18 months of Final Occupancy applicant/developer shall provide a third-party certification document that this standard has been met.

4. Prior to issuance of occupancy permits, the applicant/developer shall demonstrate to the satisfaction of the City, that the proposed parking areas for employee passenger automobiles are designed and will be built to accommodate electric vehicle (EV) charging stations, at no cost to employees. At minimum, the parking shall be designed to accommodate and will provide a number of EV charging stations equal the Tier 1 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2.
5. Prior to issuance of occupancy permits, the applicant/developer shall demonstrate to the satisfaction of the City, that the proposed parking areas for passenger automobiles are designed and will be built to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces for passenger automobiles shall equal the Tier 1 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.1.2.

G-23 cont'd

Measures Related to Construction

6. Prior to the issuance of the first building permit, the applicant/developer shall demonstrate compliance with District Rule 9510 (Indirect Source Review) to reduce growth in both NOx and PM10 emissions.
7. Architectural and industrial maintenance coatings (e.g., paints) applied on the project site shall have volatile organic compound levels of less than 10 g/L.
8. The applicant/developer shall require contractor to establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to construction workers.
9. The applicant/developer shall require contractor to provide information on transit and ridesharing programs and services to construction employees.
10. The applicant/developer shall comply with SJVAPCD Dust Regulation VIII (Fugitive Dust PM_{10} Prohibitions).

Measures Related to Low Impact, Zero Emissions Trucks, BMPs, and Equipment for Project Operations/Tenants

11. The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all on-going operational responsibilities.
    a. The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.

2

A zero-emission vehicle shall be considered commercially available if a vehicle capable of serving the intended purpose is included in California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, https://californiahvip.org/ or listed as available in the US on the Global Commercial Vehicle Drive to Zero inventory, https://globaldrivetozero.org/. A zero-emission vehicle shall be considered not commercially available if California Air Resources Board staff has determined the required vehicle configuration is "unavailable," as part of its implementation of an Advanced Clean Fleet regulation, or otherwise.

"Domiciled at the project site" shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission heavy-duty trucks which require service can be temporarily replaced with model year 2014 or later trucks. Replacement trucks shall be used for only the minimum time required for servicing fleet trucks.

b. The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2027.

G-23 cont'd

"Domiciled at the project site" shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission vehicles which require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles.

The property owner/tenant/lessee shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the project site.

c. The property owner/tenant/lessee shall procure the zero emission vehicles/trucks required to meet the "clean fleet" requirements in (a) and (b) above. In the event that there is a disruption in the manufacturing of zero emission vehicles/trucks or that sufficient vehicles/trucks are not commercially available for the intended application, the "clean fleet requirements" may be adjusted as minimally as possible by the City to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks. The City shall quantify

3

the air pollution and GHG emissions resulting from any modification of this condition. Within 12 months of failing to meet a "clean fleet" requirement the property owner/tenant/lessee shall implement a Voluntary Emissions Reduction Agreement (VERA) providing pound for pound mitigation of the criteria pollutant, toxic air contaminants, and GHG emissions quantified by the City through a process that develops, funds, and implements emission reduction projects, with the Air District serving a role of administrator of the emission reduction projects and verifier of the successful mitigation effort. The VERA shall prioritize projects in the South Stockton and surrounding area. Property owner/tenant/lessee shall continue to fund the VERA each year in an amount necessary to achieve pound for pound mitigation of emissions resulting from not meeting the clean fleet requirements until the owner/tenant/lessee fully complies. Any modification of this condition shall only permit the delayed adoption of 100% electric vehicles for the shortest time period necessary to ensure the 100% electrification requirement can be achieved. The property owner/tenant/lessee shall annually provide to the City all necessary documentation to verify that it is meeting the "clean fleet" requirements in (a) and (b) above, and such documentation shall be publicly available to the community. City staff may seek the recommendation of the California Air Resources Board in determining whether there has been a manufacturing disruption or insufficient vehicles/trucks commercially available for the intended application.

G-23 cont'd

The property owner/tenant/lessee shall annually provide to the City all necessary documentation to verify that it is meeting the "clean fleet" requirements in (a) and (b) above, and such documentation shall be publicly available to the community. The City Community Development Director shall consider a report from the property owner/tenant/lessee on compliance with this condition during the annual Development Agreement review hearing and shall make a determination as to whether the project is in compliance with it at a public hearing on an annual basis until total compliance with this condition is achieved. Notice of that hearing shall be provided to all properties located within 1,000 feet of the project site and through the ASK Stockton list serve.

d. The property owner/tenant/lessee shall ensure all on-site equipment and vehicles (e.g., yard hostlers, yard equipment, forklifts, yard trucks and tractors, and pallet jacks) used within the project site are all electric-powered or zero-emission from start of operations.

e. The property owner/tenant/lessee shall provide the necessary infrastructure, including electrical charging stations to adequately support all zero-emission/all-electric vehicles and equipment that will be operating on-site.

f. At least 30 days prior to applying for building permits, the property owner/tenant/lessee shall submit plans for review and approval of City staff, which include the necessary infrastructure for future use of zero emission vehicles, including both heavy-duty and delivery trucks (e.g., installation of conduit specifically designated for truck charging equipment in the future).

4

g. Applicant/tenant/lessee shall periodically sweep the property to remove road dust, tire wear, brake dust and other contaminants in parking lots.

h. Applicant/tenant/lessee shall not use diesel back-up generators on the property unless absolutely necessary. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Applicant/tenant/lessee shall utilize emergency back-up generators that meet CARB's Tier 4 emission standards or have the least emissions.

i. The property owner/tenant/lessee shall monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.

12. Within 30-days of occupancy, applicant/tenant shall demonstrate to the satisfaction of City staff, that the required zero emission vehicle requirements are being met.

13. To reduce idling emissions from transport trucks, the applicant/developer shall have signage placed at truck access gates, loading docks, and truck parking areas that clearly notes idling for more than three minutes is strictly prohibited on the subject property, subject to exceptions defined by CARB. If approved by the County after communication by the City, the applicant/developer shall fund placement of similar signs in the adjacent streets used for access (other than by emergency vehicles, i.e., Mariposa Road). Each sign placed outside the interior premises of the subject property should note the idling prohibition on the adjacent streets and include telephone numbers of the building facilities manager and the California Air Resources Board (ARB) to report violations. All signage should be made of weather-proof materials. All site and architectural plans submitted to the City shall note the locations of these signs.

14. Demonstrate compliance with SB 1383 requirements regarding organic waste and edible food recovery. SB 1383 requires all businesses to separate organics and recyclable materials from trash and either subscribe to the required collection services or self-haul organics to an appropriate facility for diversion. It also requires some businesses to donate excess edible food to feed people in addition to starting an organics collection service.

G-23 cont'd

Other Measures Related to Tenants

15. If the project site were to have any tenants, the applicant/developer shall include contractual language in tenant lease agreements that requires the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), and the Statewide Truck and Bus Regulation.

16. If the project site were to have any tenants, the applicant/developer shall include contractual language in tenant lease agreements that requires tenant to shall construct electric light- and heavy-duty truck charging station(s) onsite with adequate capacity and

5

the capability to charge all electric vehicles using the site subject to the lease. If applicant/developer operates the site, it shall install the charging stations. Charging station(s) shall be installed prior to the City issuing certificates of occupancy.

17. Construction of cold storage facilities are prohibited on the project site. If the project site were to have any tenants, the applicant/developer shall include contractual language in tenant lease agreements that prohibit the construction of cold storage facilities and any transport refrigeration units (TRUs) entering the project-site. Any future proposal to construct cold storage facilities and/or use TRUs on the project site shall require submittal of a commission use permit application and be subject to review under the California Environmental Quality Act and applicable Municipal Code requirements.
18. If the project site were to have any tenants, the applicant/developer will require tenant to establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to tenant workers.
19. If the project site were to have any tenants, the applicant/developer will require tenant to provide transit and ridesharing information for construction workers.
20. If the project site were to have any tenants, the applicant/developer shall ensure that tenants enroll in the United States Environmental Protection Agency's SmartWay program, and require tenants to use carriers that are SmartWay carriers.

G-23 cont'd

Response to Letter G: Shute Mihaly & Weinberger

Response G-1: The commentor provides introductory statements regarding the Draft EIR, and summarizes their concerns, which are detailed in Comments G-2 through G-12. This comment serves as an introduction to the comment letter. Please see Responses G-2 through G-12.

As suggested by the commentor, the Draft EIR was revised and recirculated for an additional public review period (i.e. the Recirculated DEIR or RDEIR). This Response to Comments document responds to the Baseline Report. See responses to comments G-13 through G-18.

Response G-2: As described in Chapter 2.0, Project Description, of the Recirculated Draft EIR, the Project would include the construction and subsequent operation of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a DDC. The two buildings (approximately 543,526 sf for Building 1 and 1,193,198 sf for Building 2) total approximately 1,736,724 sf on the Project site. The smaller Building 1 is anticipated to serve as the annex by providing additional storage for high-turnover merchandise processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a Direct Delivery Center (DDC), an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery through Market Delivery Operations (MDO) located in various smaller cities in the Northern California region. DDC warehouses distribute ordered goods to the MDOs for delivery (by appointment) to the members. Cold storage would not be provided as part of the proposed Project.

Costco anticipates that approximately 100 trucks and 300 trailers typically would be parked on site, with the typical truck size being approximately 70 feet long for double-axle trailers. Trucks would enter the site from West Schulte Road at the eastern driveway. The proposed eastern driveway would provide two inbound lanes at West Schulte Road that widen to three lanes within the site, each of approximately 2,300 feet, providing on-site storage capacity for up to 90 trucks awaiting processing at the security gate.

It is anticipated that the Project facilities will employ approximately 150 to 250 full-time employees during operation that would work from between 4 a.m. to 11 p.m. daily. The Project is anticipated to generate approximately 400 jobs during the construction phase.

Once products are delivered to the buildings, operational activities would be contained within the buildings.

Response G-3: The RDEIR does not include cold storage or any food processing activities (see the RDEIR Chapter 2.0: Project Description, for further detail).

Response G-4: The full plan set for the Project is included in Appendix A of this document.

The site plan shown in Figure 2.0-4 in Chapter 2.0, Project Description, of the RDEIR, shows the building sizes, building locations, overall site layout, parking areas, bio-retention areas, site access points, parking areas, and other Project details. Additionally, the stormwater quality control plan is included as Appendix I (Stormwater Quality Control Plan) of the Draft EIR. The stormwater quality control plan shows further details regarding the bio-retention areas, as well as typical sections of stormwater treatment planters and drainage area calculations. The preliminary grading and drainage plan is included in Appendix J (Costco Depot Project Planning Submittal Review for Drainage and Flood). Further, Figure 25 in Appendix F (Traffic Analysis) illustrates STAA truck turning templates.

Figures 2.0-5 and 2.0-6 correspond to the discussion on page 2.0-9 of Chapter 2.0, Project Description, of the RDEIR. As discussed, the Project site is designated as Agriculture by the County's General Plan Land Use Map. The site is within the City's Sphere of Influence 10-Year Planning Horizon and currently has a City General Plan land use designation of Industrial (I). Figure 2.0-5 shows the existing City and County land use designations on the left (as denoted by "EXISTING" in the bottom left corner), and proposed City land use designation on the right (as denoted by "PROPOSED" in the bottom right corner).

The Project site is currently within the jurisdiction of San Joaquin County. As noted above, current county zoning for the Project site is AG-40. The San Joaquin County Local Agency Formation Commission (LAFCO) will require the Project site to be pre-zoned by the City of Tracy prior to the proposed annexation. The City's pre-zoning will include the Light Industrial (M-1) zoning designation for the Project site. The pre-zoning would go into effect upon annexation into the City of Tracy. The proposed pre-zoning for the Project site is shown on Figure 2.0-6. Similar to Figure 2.0-5, Figure 2.0-6 shows the existing County zoning on the left (as denoted by "EXISTING" in the bottom left corner), and proposed City zoning on the right (as denoted by "PROPOSED" in the bottom right corner).

Response G-5: Since this comment was submitted, the Project Description was updated to include myriad Project Features/Sustainability Measures, the air quality and GHG analyses were revised with more conservative and more accurate assumptions and a Recirculated Draft EIR underwent public review and comment. Responses to the Baseline Report are provided in responses to comments G-13 through G-18. This Response to Comments document has revised the EIR to include far more feasible mitigation measures than were set forth in the Recirculated Draft EIR. Those measures will be included as conditions of any Project approval and monitored through the Mitigation Monitoring and Reporting Program. The preparation of CEQA documents relies upon reasonable assumptions, including on such items as the number of vehicles associated with the project. In this instance, the assumptions appear conservative (for instance, see the applicant's comment letter indicating the much smaller number of truck trips expected than the EIR assumes) and thus they fully capture expected Project effects.

Response G-6: The Project is required to comply with San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 9510. Rule 9510 requires the applicant to pay off-site mitigation fees, if the mitigation measures associated with the project are insufficient to meet the criteria

pollutant reduction requirements associated with Rule 9510. However, it is impossible to know exactly what those off-site fees will fund. See further detail in our Response to the more recent Schute, Mihaley & Weinberger comment on this topic, in comment responses L-12 and L-13.

Furthermore, for additional responses to each of the concerns identified by the commentor relating to the various appendices provided by this comment letter (i.e. Appendices B through F), see comment responses G-19 through G-23, respectively.

With regard to the commentor's claim that additional mitigation is required, a total of 35 new air quality-related mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. The EIR has not deferred the formulation of any mitigation measures, nor does the commentor specify where it believes deferral has occurred. Specifically, the following changes have been made to pages 3.3-32 through page 3.3-35 of Section 3.3: Air Quality of the Recirculated Draft EIR (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.):

> MITIGATION MEASURE(S)
>
> ***Mitigation Measure 3.3-1:*** *During Project operation, operators of heavy-duty trucks that travel to and from the Project site are required to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment.*
>
> ***Mitigation Measure 3.3-2****: The Project applicant shall supply 100% of project electricity from renewable sources. The Project applicant shall procure power from a combination of onsite solar generation and direct source renewable purchased energy; however, at no time shall the Project site be supplied with any greater than 3.4 megawatts of direct source renewable purchased energy.*
>
> ***Mitigation Measure 3.3-3****: Upon Project opening, the Project applicant shall generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site. Such facilities may include solar photovoltaic panels on the roofs of the buildings or elsewhere on site (e.g., awnings, canopies or "solar trees" in parking area).*
>
> ***Mitigation Measure 3.3-4****: The Project shall be designed and constructed to allow future expansion of solar facilities on site as electricity demand increases. The Project applicant shall, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.*
>
> ***Mitigation Measure 3.3-5****: The Project applicant shall ensure that no natural gas service shall be supplied to the site.*
>
> ***Mitigation Measure 3.3-6****: The Project applicant shall ensure that diesel generators shall not be used on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.*
>
> ***Mitigation Measure 3.3-7****: The Project applicant shall ensure that, during Project operation, for trucks owned or operated by Costco that access the site, only ultra-low*

sulfur diesel fuel or biodiesel blended with sulfur content of 15 ppm or less shall be used, so long as such fuel is commercially available.

***Mitigation Measure 3.3-8**: The Project applicant shall install and maintain perimeter landscaping that includes vegetation and a tree canopy (which may include structural solar canopies).*

***Mitigation Measure 3.3-9**: The Project applicant shall ensure the Project building(s) exceeds applicable Title 24 Building Envelope Energy Efficiency Standards by at least 1%.*

***Mitigation Measure 3.3-10**: The Project applicant shall install Energy Star certified appliances or equivalent.*

***Mitigation Measure 3.3-11**: The Project applicant shall install energy efficient lighting that meets or exceeds Title 24 requirements.*

***Mitigation Measure 3.3-12**: The Project applicant shall install roofs with a reflectivity factor of at least 78 to the extent that such roofs do not interfere with photovoltaics installed on roofs.*

***Mitigation Measure 3.3-13**: The Project applicant shall ensure that construction plans require that architectural and industrial maintenance coatings (e.g., paints) applied on the Project site shall be consistent with a VOC content of <50 g/L. However, the Project applicant shall not be expected to exercise control over materials painted offsite by a third party.*

***Mitigation Measure 3.3-14**: The Project applicant shall devise and implement a property maintenance plan during Project operation that includes sweeping parking lots regularly to remove road dust, tire wear, brake dust, and other contaminants.*

***Mitigation Measure 3.3-15**: The Project applicant shall Install High Efficiency MERV filters within the HVAC systems.*

***Mitigation Measure 3.3-16**: The Project applicant shall install a separate employee parking area accessible by its own curb cut entry and a flashing lit sidewalk that connects the employee parking with the buildings.*

***Mitigation Measure 3.3-17**: The Project applicant shall provide bicycle parking for employee bicycles at the front entry of each building. Bicycle parking shall be secure and shall be located indoors or be covered. Provide locker/shower facilities for employees who commute via bicycle.*

***Mitigation Measure 3.3-18**: The Project applicant shall provide electrical outlets for charging of employee e-bikes.*

***Mitigation Measure 3.3-19**: The Project applicant shall provide no more than the minimum number of parking spaces required by City code.*

***Mitigation Measure 3.3-20**: The Project applicant shall participate in an existing, agency-run employee rideshare program, such as dibs by the San Joaquin Council of Government or another similar program, and promote ridesharing among its employees.*

***Mitigation Measure 3.3-21**: The Project applicant shall provide food and drink service for sale onsite to provide meal options to operations employees in a consistent manner.*

Mitigation Measure 3.3-22*: The Project applicant shall take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site shall be required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.*

Mitigation Measure 3.3-23*: The Project applicant shall train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.*

Mitigation Measure 3.3-24*: The Project applicant shall Designate efficient truck routes for trucks owned and operated by Costco.*

Mitigation Measure 3.3-25*: The Project applicant shall ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) shall be electric or zero-emission vehicles. The Project applicant shall provide on-site electrical charging facilities to adequately service such electric vehicles.*

Mitigation Measure 3.3-26*: The Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).*

Mitigation Measure 3.3-27*: The Project applicant shall ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs).*

Mitigation Measure 3.3-28*: The Project applicant shall provide priority parking for employee carpool vehicles.*

Mitigation Measure 3.3-29*: The Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.*

Mitigation Measure 3.3-30*: The Project applicant shall ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines.*

Mitigation Measure 3.3-31*: The Project applicant shall provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators shall be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%.*

Mitigation Measure 3.3-32*: The Project applicant shall ensure that heavy-duty diesel hauling trucks that access the Project site for construction shall be model year 2010 or newer, so long as such trucks are reasonably available.*

Mitigation Measure 3.3-33*: The Project applicant shall prepare and implement a construction traffic control plan during the Project's construction phase.*

Mitigation Measure 3.3-34*: The Project applicant shall, during construction, install signage on any unpaved primary construction accessways onsite on the project site to limit vehicle speeds to no more than 15 mph.*

Mitigation Measure 3.3-35*: Project construction plans and specifications shall require the contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide food service in a consistent manner.*

Mitigation Measure 3.3-36*: The Project applicant shall employ the following strategies during construction to minimize noise:*

(a) Concrete delivery vehicles shall have low frequency back up beepers that meet Cal-OSHA requirements.

(b) All fleet equipment shall have mufflers and noise-minimizing devices.

(c) Personal radios shall not be allowed onsite.

Response G-7: Impacts related to the four CEQA Guidelines questions listed in this comment are analyzed in Section 3.13, Transportation and Circulation, of the Draft EIR. A General Plan consistency table was added to Section 3.10, Land Use, of the Draft EIR. See Chapter 3.0 of this Responses to Comments document for the consistency analysis, including for policies mentioned in this comment.

See Response G-8 regarding the VMT mitigation. Project impacts related to VMT would be significant and unavoidable. Page 3.13-16 of the Draft EIR states the following:

Mitigation Measure 3.13-1, which requires travel demand management (TDM) strategies, would be required. Implementation of Mitigation Measure 3.13-1 is feasible because it is within the applicant's purview to implement and the TDM measures have been found effective in previous academic studies. However, the precise effectiveness of specific TDM strategies can be difficult to accurately measure due to a number of external factors such as employee responses to strategies and changes to technology.

As part of Mitigation Measure 3:13-1, the proposed Project would be required to monitor and evaluate the effectiveness of the Project's TDM Plan and provide the results to the City of Tracy. Based on the results of the evaluation, modifications to the TDM Plan may be required by the City in order to improve effectiveness toward achieving the home-based work VMT per worker target.

Based on the above, even with the implementation of Mitigation Measure 3.13-1, the impact would remain significant and unavoidable when compared to the City of Tracy's VMT threshold of significance.

Response G-8: Since the release of the 2022 Draft EIR, the applicant has agreed to several additional TDM measures. See Chapter 3.0 of this Response to Comments document for the revisions to Table 3.13-2 and Mitigation Measure 3.13-1. The TDM strategies aim to achieve a feasible maximum of 12 percent VMT reduction, with the opportunity for 3 percent VMT reduction coming from the VMT Banking Fee Program. If the VMT banking

fee has not been adopted by the time the Project is built, the applicant would not have to pay into the VMT banking fee program because there would be no such fee program to implement. In this case, the applicant would be required to take all actions needed to reduce VMT by 15% with TDM measures.

It is also noted that the State Office of Planning and Research guidance was utilized as part of the VMT analysis for the Project.

Response G-9: With regard to the commentor's claim that the Project underestimated emissions from warehouse vehicle trips, it should be noted that, in the absence of more specific information on the trip lengths associated with a project, default CalEEMod modeling trip lengths are employed, as described in the CalEEMod User's Guide. The default trip lengths account for the land use type selected within the model (unrefrigerated warehouse). Since specific information on estimated vehicle trip lengths was not available, it was appropriate to utilize the default trip lengths as provided in CalEEMod. Nevertheless, within the Recirculated Draft EIR, the HHD truck travel trip length has been revised to be 29 miles, within the Recirculated Draft EIR. Specifically, heavy-duty operational truck trips were assumed to travel 29 miles per one-way trip, on average, consistent with San Joaquin County's travel demand model. This is a longer trip length than recommended by the Baseline Report, as discussed further in the response to comment G-15.

With regard to the claim that there was an incomplete analysis of emissions from refrigeration, the Project does not include cold storage. The HRA for the Draft EIR assumed that 15% of trucks would have Transport Refrigeration Units (TRUs), for the sake of a conservative analysis; however, the Project would not include the usage of TRUs, since the Project does not contain refrigeration. The revised HRA contained in the Recirculated EIR has removed analysis of TRUs, since they would not be part of this project. Moreover, Mitigation Measure 3.3-27 requires the Project applicant to ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs).

Regarding the commentor's claim that there was inadequate mitigation for the significant and unavoidable air quality impact, it should be noted that 36 mitigation measures were included in Section 3.3: Air Quality of the Recirculated Draft EIR. See comment response G-6 for further detail. With regard to the 33.3% reduction associated with Rule 9510, this is a reduction assumed based on the requirements of Rule 9510; it is not based on mitigation.

Response G-10: It should also be noted that the Recirculated Draft EIR substitutes for the Draft EIR, with regard to greenhouse gas emissions and energy. Ultimately, the project's consistency with the CARB's latest Scoping Plan and the SJCOG's latest RTP/SCS ensure that the project would contribute what is required to achieve the State's long-term climate goals. Since the Project is consistent with these plans, as analyzed in the Recirculated Draft EIR, the Project would not be considered to generate greenhouse gas 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 greenhouse gases. In addition, revisions to and an expansion of Table 3.7-5 (the table that includes an analysis of the Project's consistency with the SJCOG's RTP/SCS) have been included in this Final EIR (see Chapter 3.0: Revisions, of this Final EIR, for detail). Furthermore, see Table 3.7-4 for the analysis of the Project's consistency with the 2022 Scoping Plan.

Furthermore, as described within the Recirculated DEIR, the project's energy impacts would be less than significant, and no mitigation measures are required. Therefore, implementation of the mitigation measure recommended by the commentor are not required. Nevertheless, an additional 35 mitigation measures have been added in Section 3.3: Air Quality of the Recirculated Draft EIR, most of which would reduce greenhouse gas emissions and energy impacts as well. See Comment Response to G-6 above, for further detail. Additionally, see Comment Response G-11, below, for a description of some examples of mitigation measures that have been added to the Recirculated Draft EIR, to address the concerns identified in this comment.

Lastly, please refer to our comment responses to the Schute, Mihaly & Weinberger comment letter on the Recirculated Draft EIR (e.g. see the comment response to Comment L-9, for further detail).

Response G-11: A General Plan consistency table was added to Section 3.10, Land Use, of the Draft EIR. See Chapter 3.0 of this Responses to Comments document for the consistency analysis, including for policies mentioned in this comment.

With respect to Policy AQ-1.2-P3, the Project applicant would implement best management practices to reduce air emissions associated with construction and operation. A list of such practices included as Project components is provided in Chapter 2.0, Project Description, of the Draft EIR. See pages 2.0-3 through 2.0-5.

Moreover, the Final EIR has added an additional 35 air-quality related mitigation measures, beyond what was included in the RDEIR. Many of these mitigation measures would reduce air emissions associated with construction and operation. For example, Mitigation Measure 3.3-2 requires the Project applicant to supply 100% of project electricity from renewable sources. The Project applicant is also required to procure power from a combination of onsite solar generation and direct source renewable purchased energy. Mitigation Measure 3.3-3 requires the Project applicant to generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site. Further, Mitigation Measure 3.3-4 requires the Project applicant to, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.

Furthermore, Mitigation Measure 3.3-5 requires the Project applicant to ensure that no natural gas service shall be supplied to the site. Mitigation Measure 3.3-6 requires the Project applicant to ensure that diesel generators shall not be used on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.

Mitigation Measure 3.3-7 requires the Project applicant to ensure that, during Project operation, for trucks owned or operated by Costco that access the site, only ultra-low sulfur diesel fuel or biodiesel blended with sulfur content of 15 ppm or less shall be used, so long as such fuel is commercially available. Mitigation Measure 3.3-27 requires the Project applicant to ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs). Mitigation Measure 3.3-22 requires the Project applicant shall take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site would be required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.

Moreover, Mitigation Measure 3.3-26 requires the Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).

Examples of mitigation that would reduce emissions during Project construction include Mitigation Measure 3.3-30, which requires the Project applicant to ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower would have final Tier IV-compliant or better engines. Additionally, Mitigation Measure 3.3-31 requires the Project applicant to provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators must be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%. Additionally, as provided under Mitigation Measure 3.3-32, The Project is required to ensure that heavy-duty diesel hauling trucks that access the Project site for construction must be model year 2010 or newer, so long as such trucks are reasonably available. Additional Mitigation Measures are provided in Chapter 3.0: Errata.

With respect to Policy AQ-1.2-P14, as previously stated, there are 36 mitigation measures included in Section 3.3: Air Quality of Final EIR (of which 35 are new to the Final EIR), which would ensure that the developer is implementing best management practices to reduce air pollutant emissions associated with the construction and operation of development projects.

With respect to Policy AQ-1.2-P15, which encourages businesses to electrify loading docks or implement idling-reduction systems so that trucks transporting refrigerated goods can continue to power cab cooling elements during loading, layovers, and rest periods, the new Mitigation Measure 3.3-26 of the Final EIR requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck

docks to serve electric trucks in the future. Such conduit is required to be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or docking stations).

With respect to Policy AQ-1.4-P3, which requires the City to be proactive in reducing greenhouse gas emissions from City operations as well as new or renovated development, as previously stated, there are 36 mitigation measures included in Section 3.3: Air Quality of the Final EIR. Most of these mitigation measures would also reduce greenhouse gas emissions.

With respect to Policy CIR-1.2-P3, which encourages new developments to be designed to provide vehicular, bicycle and pedestrian connections with adjacent developments, the Project would provide for (vehicular, bicycle, and pedestrian) connections with the adjacent roadway along Schulte Road, as appropriate. There would also be a traffic light at the Project intersection. However, as a warehouse project, the Project is not anticipated to include any additional connections to nearby developments, since such connections would not be applicable to a warehouse project, since warehouse projects include heavy-duty truck traffic; therefore, the Project site would not be suitable as a land use that connects to adjacent developments.

With respect to Policy CIR-1.3-P6, which encourages new development to include pedestrian and bicycle facilities internal to the development and that connect to city-wide facilities, such as parks, school, and recreational corridors, as well as adjacent development and other services, an ADA-compliant pedestrian pathway would extend from each building to the northern property boundary, where it would connect to West Schulte Road. Additionally, bicycle parking would be provided in the employee parking lot and at the front entry of each building. There are no parks, schools, or recreational corridors in the Project vicinity.. Nevertheless, Mitigation Measure 3.3-17, which is included in the Final EIR, requires the Project applicant to provide bicycle parking for employee bicycles at the front entry of each building. Bicycle parking is also required to be secure and must be located indoors or be covered. Locker/shower facilities for employees who commute via bicycle would also be provided per Mitigation Measure 3.13-1.

With respect to Policy CIR-3.1-P7, the Project would include bicycle parking and electric bicycle charging stations, as described by Mitigation Measure 3.3-17 and Mitigation Measure 3.3-18, respectively.

Policy CIR-4.1-P5 requires development to provide for transit and transit-related increased modal opportunities, such as adequate street widths and curb radii, bus turnouts, bus shelters, park-and-ride lots and multi-modal transit center through the development and environmental review processes, if appropriate. The Project would not conflict with this policy. As described in the Environmental Setting of Section 3.13 of the Draft EIR, there is currently no existing pedestrian, bicycle, or transit service/facility within

the undeveloped Project area. The Project site is not an appropriate location in the City for transit opportunities because transit does not currently extend to the study area.

Response G-12: This comment serves as a conclusion to the letter. Please see Responses G-1 through G-11 for specific responses to the various concerns summarized in this portion of the comment letter.

Response G-13: This comment serves an introduction to Appendix A of this comment letter. Specific responses to the individual concerns identified by Appendix A of this comment letter are provided in comment responses G-14 through G-18 below.

Response G-14: The commentor states various facts relating to the air quality emissions modeling associated with the Project. No specific concern is identified by this comment.

Response G-15: As described under comment response G-9, with regard to the commentor's claim that the Project underestimated emissions from warehouse vehicle trips, it should be noted that, in the absence of more specific information on the trip lengths associated with a project, default CalEEMod modeling trip lengths are employed, as described in the CalEEMod User's Guide. The default trip lengths account for the land use type selected within the model (unrefrigerated warehouse). Since specific information on estimated vehicle trip lengths was not available, it was appropriate to utilize the default trip lengths as provided in CalEEMod. Nevertheless, within the Recirculated Draft EIR, the average HHD truck travel trip length has been revised to be 29 miles. Specifically, heavy-duty operational truck trips were assumed to travel 29 miles per one-way trip, on average, consistent with San Joaquin County's travel demand model. This is a conservative factor, since some vehicles would be traveling to and from a nearby Costco facility only 1.5 miles away. Moreover, this is a longer trip length than recommended in comment G-15.

With regard to the trip type percentages, given that trip lengths were made the same length for the purposes of modeling (trip lengths were determined to be a weighted average distance of 21.37224776 miles, based on the default trip distances for passenger vehicles and the assumed conservative estimate of 29 mile distance for heavy-duty truck trips, weighted by total trips per vehicle type), differentiating trip types based on vehicle types per the commentor's suggestion would not change the numerical results of the analysis. The different trip types were already accounted for by the model via other means (specifically, heavy-duty truck trips were accounted for via the fleet mix parameter, consistent with the data proved by the traffic consultant, Kimley-Horn and Associates). Therefore, the trip type percentages identified by the commentor were not included within the model since they do not affect the modeling outputs one way or the other. This is further discussed under comment response L-1 (in response to a comment by the Sierra Club on the Recirculated Draft EIR.)

Response G-16: As described under comment response G-9, the Project does not include cold storage. The HRA for the Draft EIR assumed that 15% of trucks would have Transport Refrigeration Units (TRUs), for the sake of a conservative analysis; however, the Project would not

include the usage of TRUs, since the Project does not contain refrigeration. The revised HRA contained in the Recirculated EIR has removed analysis of TRUs, since they would not be part of this project. Moreover, Mitigation Measure 3.3-27 requires the Project applicant to ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs).

Response G-17: With regard to the commentor's claim regarding lack of adequate mitigation, as previously described in Response G-6, a total of 35 new air quality-related mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR.

With regard to the commentor's concern regarding Mitigation Measure 3.3-1, the commitment was incorporated consistent with guidelines and recommendations from the California Attorney General. Additionally, although not required by Mitigation Measure 3.3-1, Costco may choose to require some or all 3rd party trucks to be 2010 or later, through contracts. Moreover, since the average life of a heavy-duty truck is approximately 15 years[3], most heavy-duty trucks would be newer than 2010 anyhow. Further, the addition of 35 additional air quality-related mitigation measures ensures that all feasible mitigation strategies for air quality emissions are included within the Final EIR.

Separately, the reduction of 33.3% of the Project's operational baseline NOx emissions is a representation of the compliance requirement of Rule 9510, and is not a mitigation measure. Thus, it is not deferred mitigation.

The Rule 9510 compliance can be met in a variety of ways, including by accounting for the various project design features or mitigation measures associated with the Project (including those mitigation measures that were not quantified within the RDEIR itself, due to the difficulty in modeling the emissions reductions that would be associated with implementation of Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36) and/or through fees paid to the Air District to fund off-site improvements. Many of the 35 new additional air quality-related mitigation measures would help the Project achieve such a reduction. Compliance with Rule 9510 is required so the Project would not be allowed to be developed without approval from SJVAPCD that Rule 9510 has been satisfied. Therefore, assuming that the Project would meet the requirements of Rule 9510 is appropriate approach for CEQA disclosure. Additionally, the Project applicant has prepared and submitted an AIA application to SJVAPCD to meet the requirements of Rule 9510.

Response G-18: As described in comment response L-6 (to the Shute, Mihaly & Weinberger letter provided on the RDEIR), the analysis provided throughout Section 3.7: Greenhouse Gases, Climate Change, and Energy describes how the Project would in fact be consistent with the State's fair share contribution to GHG impacts. The commentor's claim that a "net zero" threshold should be established for the Project is baseless. Specifically, a "net zero" threshold is not set forth within any of the state or SJVAPCD suggested thresholds; lead

[3] See: https://www.tristatetruck.com/blog/posts/what-is-the-average-lifespan-of-a-long-haul-truck

agencies have flexibility to employ the thresholds they believe are appropriate; lastly, the threshold used here was specifically embraced within the cited *Center for Biological Diversity v. California Dept. of Fish & Wildlife (2015) 62 Cal.4th 204 ("Newhall Ranch")* case.

Further, as described in comment response L-8 (to the Shute, Mihaly & Weinberger letter provided on the RDEIR), overall, as stated in Section 3.7 of the RDEIR, the proposed Project would be consistent with relevant plans, policies, and regulations associated with GHGs, notably the most recent version of the CARB's Scoping Plan, and the SJCOG's 2022 RTP/SCS. This would ensure that the proposed Project would be consistent with, and would not impair, the State's carbon neutrality standard by year 2045 as established under AB 1279. Since the Project would be consistent with State GHG Plans, it would not impede the State's goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and of achieving carbon neutrality by 2045. The proposed Project would make a reasonable fair share contribution to the State's GHG reduction goals, by implementing a wide array of Project features, as well as a wide array of GHG-related mitigation measures, that would reduce GHG emissions and therefore, the proposed Project's GHG emissions would be considered to have a less than significant impact. Simply because a development project would increase GHGs in comparison to the existing scenario, does not mean that a Project would not be consistent with the CARB's Scoping Plan, and the SJCOG's 2022 RTP/SCS.

Furthermore, an analysis of the Project's consistency with the goals associated with year 2045 are also provided in the RDEIR's Section 3.7: Greenhouse Gas Emissions, Climate Change, and Energy.

Moreover, Mitigation Measure 3.3-5 requires the Project applicant to ensure that no natural gas service shall be supplied to the site. Additionally, Mitigation Measure 3.3-26 requires Costco to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. The conduit will serve 50% of the number of truck docking stations.

Response G-19: The commentor provides a list of potential additional mitigation measures identified by the Air District as potential mitigation measures for development projects in general. As previously stated under comment response G-6, a total of 35 new air quality-related mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR.

Response G-20: The commentor submitted the California Air Resources Board (CARB) Concept Paper for the Freight Handbook, which does not specifically comment on the proposed Project or the contents of the EIR. In addition, the Project is not one of the three types of land use projects that the Handbook suggests should receive special consideration as to siting and mitigation strategies. However, many of the mitigation measures added to the Final EIR to address Air Quality impacts are consistent with and advance the goals and suggestions within the Handbook. Indeed, as previously stated under comment response G-6, a total

of 35 new air quality-related mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR.

Response G-21: The commentor submitted a copy of Conditions of Approval for the Centerpoint Project located in a different jurisdiction. The comment does not address or directly pertain to the proposed Project or the contents of the EIR. However, many of the mitigation measures added to the Final EIR to lessen Air Quality impacts are consistent with conditions within the comment.

Response G-22: While this comment does not address or pertain to the proposed Project or the EIR, responses to the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" are provided below. Section I of the comment provides background only; Section II concerns planning level decisions, and the City of Tracy has already designated the Project site as Industrial. Each of the bullet points below is quoted from the comment, with responses immediately following.

III. Community Engagement

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.

Response: The City has provided a number of opportunities for public comment, including in response to the EIR Notice of Preparation, at Planning Commission EIR Scoping Meeting, during 45-day review periods for both the Draft and Recirculated EIRs, at the Planning Commission for the Draft EIR and at the Environmental Sustainability Commission meeting for the RDEIR. Additional public hearings will be held at the Planning Commission and City Council to accept public input.

- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The information should be in a format that is easy to navigate and understand for members of the affected community.

Response: The City has a link to project information under the Costco Depot Annexation Project that includes the Notice of Preparation, Notice of Availability, the Draft EIR, and the Recirculated Draft EIR. Included with these documents are the project description, maps and drawings, and the documents outline ways for the public to provide input (see link at https://www.cityoftracy.org/our-city/departments/planning/specific-plans-environmental-impact-reports-and-initial-studies/-folder-77). In addition, the City has an online Industrial and Commercial Pipeline report that is updated on a monthly basis, which provides information on the status of current project applications under review.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.

Response: Public hearings are required for all Development Review applications. The City of Tracy requires a public notice of the hearing to be sent to all property owners within 300 feet of the subject property and posted in a local newspaper. As discussed above, members of the public have had and will have the opportunity to comment on Costco's proposal and the EIR during public hearings and the public process.

- Providing translation or interpretation in residents native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.

Response: As discussed above, a link has been provided on the City's website, which provides information related to the project and outlines ways in which the public can provide input on the project.

- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.

Response: A community benefits agreement is not necessary in that Costco has indicated its willingness to adopt additional mitigation measures as identified herein that will benefit the local community and further sustainability goals of the City and the State. In addition, the project is expected to beneficially contribute to the local economy through increased sales taxes and property taxes.

- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.

Response: Local residents have had the opportunity to review and provide feedback on the project through the Draft EIR, the Recirculated Draft EIR, and public hearings related to each document and concerning the project.

- Identifying a person to act as a community liaison concerning on-site construction activity and operations and providing contact information for the community liaison to the surrounding community.

Response: Costco has indicated its commitment to identify a contact person to serve as a liaison for on-site construction activity and operations, and to provide the contact data for such person to the City's Community Development Department.

- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

Response: Costco has indicated its commitment to provide on-site signage identifying a contact person for community feedback that will be answered within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.

Response: There is one residence and outbuildings within 600' of the western property boundary. There is a current application (A/P21-0001 D21-0020) with the City of Tracy to construct on that land an industrial warehouse, which is currently under City review. If approved, the residence(s) and outbuildings would be removed. Additionally, this residence was evaluated in the construction and operational HRA as discussed in Appendix A.3 of the Recirculated DEIR. In the event that this residence and outbuildings are not removed, evaluation of health risks at this location indicates that health risks at this location are expected to be less than significant.

A second residence is located approximately 800 feet from the southeast property line. This residence was evaluated in the construction and operational HRA as discussed in Appendix A.3 of the RDEIR, and evaluation of health risks at this location indicates that health risk impacts are expected to be less than significant. Further, the EIR has identified various mitigation measures that are expected to further reduce the impact to this sensitive receptor, such as measures to minimize impacts from diesel trucks and facilitate the transition to electric vehicles.

It is also noteworthy that the CARB guidance that this is based on is from 2005. The guidance was created primarily based on concern about diesel emissions from trucks. Since that time, the emissions from diesel trucks have reduced due to improved diesel engine technology. The analysis included in the outdated CARB guidance is also conservative based on the assumptions incorporated into the calculations, and those analyses do not account for the specific meteorology in this area. Thus, the overall recommended separation in the CARB guidance is conservative. The CARB guidance also specifically states that the recommendations are "only guidelines and are not designed to substitute for more specific information if it exists." The Project-specific HRA is more accurate information to represent the potential health risk impacts from the Project and, consistent with the guidelines, demonstrates that an adequate separation exists between

the Project and the nearest sensitive receptors. Furthermore, Costco is committed to owning and using exclusively electrically-powered yard goats, pallet jacks, and forklifts. Mitigation Measure 3.3-25 ensures that this will occur.

- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.

Response: The site plan depicts adequate on-site parking for both trucks and other vehicles. The proposed eastern driveway will provide two inbound lanes at West Schulte Road that widen to three lanes (approximately 2,300 feet long) within the site. This will provide more than adequate on-site queuing capacity for approximately 98 trucks (considerably more than are expected at any time) awaiting processing and will eliminate parking and idling of trucks on public streets.

- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.

Response: Due to the function and operation of the Costco warehouse facilities, placing dock doors on only one side of the facilities is not a viable option. The EIR has analyzed the potential impacts associated with noise, air quality, and evaluation of health risks for the proposed building and loading dock configuration. The analysis indicates that health risk impacts would be less than significant.

- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.

Response: All public entry and exit points from the project to the public streets for vehicles and trucks are located on the north edge of the project, away from sensitive receptors. The EIR has analyzed the potential impacts associated with noise and air quality, which indicates that health risk impacts are expected to be less than significant.

- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only. Separate employee parking areas with physical landscape planters and curb barriers from heavy duty fleet trucks.

Response: The proposed site plan separates the employee parking areas from heavy duty fleet trucks by locating them on separate parts of the project site, separated by landscaped planting islands and curbed barriers.

- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.

Response: The proposed security building located at the eastern driveway will provide two inbound lanes from West Schulte Road that widen to three lanes within the site. Each of the three truck lanes is approximately 2,300 feet in queuing length before the security processing building. Based on the criteria set forth in the comment, Costco will exceed the outlined queuing length and provide ample truck queuing for trucks awaiting processing at the security gate. This will eliminate spillover of truck parking onto and idling of trucks on public streets. The following calculations outline the number of loading docks and corresponding queuing spaces provided:

Queuing

- 350 total loading docks
- 140' of space for queuing (2 spaces)
- 350 – 50 = 300 loading docks
- 300/20 = 15 truck queuing spaces
- Total queuing spaces required under parameters in comment: 17
- Total queuing spaces provided: 98

- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.

Response: All entry and exit points for heavy duty truck use are on West Schulte Road, a STAA (Surface Transportation Assistance Act) truck route, which is the street classification required for commercial-rated heavy duty truck usage.

- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.

Response: Mitigation Measure 3.11-2 requires a minimum 6-foot tall sound wall and/or landscaped berm to be constructed along the western Project boundary and requires noise barrier walls to be constructed of concrete masonry units, earthen berms, or any combination of these materials. Additionally, the project perimeters will be landscaped with trees and understory planting. The project frontage along Schulte Road will have additional setbacks and landscaping along the street and within the parking lot to meet CalGreen shading requirements and to reduce pollutant and noise dispersion.

- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.

Response: As upsizing trees does not ensure faster maturity, 24-inch box trees have been selected for the project site. These are most likely to adapt to site conditions, acclimating faster and potentially growing larger than 36-inch box trees over time.

- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.

Response: Costco intends to provide landscape maintenance through annual inspection, including review of the irrigation system, tree and vegetation health, and replacement of any dead or unhealthy landscape.

- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.

Response: Signs will be posted at the designated exit and entry points from the public street to designate separate entries and exits for trucks and for employee/service vehicles.

- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.

Response: Signs and drive aisle pavement markings will be included to clearly identify onsite circulation for trucks and employee/service vehicles.

- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

Response: Signs will be posted indicating that parking and maintenance of trucks must be conducted within designated on-site areas.

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.

Response: Mitigation Measure 3.3-30 requires Costco to ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines.

- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.

Response: Mitigation Measure 3.13-2 requires Costco, prior to the start of construction, to prepare and submit a Construction Traffic Control Plan to be implemented during construction of the project, which will include restriction on permitted construction hours. Costco has indicated that construction would typically occur within a 10-hour timeframe, either from 6 AM-4 PM or 7 AM-5 PM.

- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.

Response: Mitigation Measure 3.3-25 requires Costco to ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) are electric or zero-emission vehicles, and to provide on-site electrical charging facilities to adequately service such electric vehicles. Mitigation Measure 3.3-31 requires Costco to provide electric hookups for construction equipment. If diesel generators are needed during construction, the mitigation measure requires such generators to be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%.

- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.

Response: Mitigation Measures 3.3-25 requires Costco to provide on-site electrical charging facilities to adequately service on-site electric vehicles and Mitigation Measure 3.3-31 requires Costco to provide electric hookups for construction equipment.

- Limiting the amount of daily grading disturbance area.

Response: Mitigation Measure 3.2-1 requires Costco to demonstrate, prior to the approval of a grading permit for each phase of the Project, that the Project site plans include adequate measures to buffer adjacent agricultural uses from urban uses on the Project site and to reduce adverse impacts to neighboring agricultural uses. Costco has indicated its commitment to limit the amount of daily grading disturbance to the best of its ability. The Project will only perform the necessary grading on the site as needed.

- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.

Response: The Project will conduct grading activities consistent with SJVAPCD fugitive dust regulations. This includes employing various control measures for construction, excavation, extraction, and other earthmoving activities, as well as a requirement to

cease outdoor construction activities whenever visible dust emissions exceed 20% opacity.

- Forbidding idling of heavy equipment for more than three minutes.

Response: Mitigation Measure 3.3-22 requires Costco to take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance more than five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site will be required to be equipped with engine idle shutdown timers and (b) the developer will inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas. Further, Mitigation Measure 3.3-23 requires Costco to train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.

- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.

Response: During construction, all required records will be maintained on-site.

- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.

Response: The project's construction manager and contractor will verify compliance with construction mitigation measures, and the City will verify implementation through the Mitigation Monitoring and Reporting Program.

- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.

Response: Mitigation Measure 3.3-13 requires Costco to ensure that architectural and industrial maintenance coatings (e.g., paints) applied on the Project site shall be consistent with a VOC content of <50 g/L.

- Providing information on transit and ridesharing programs and services to construction employees.

Response: Construction employees will be employed by Costco's general contractor and subcontractors and not by Costco directly. The employers of such personnel would be responsible for communicating with their employees concerning any transit options.

- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Response: Mitigation Measure 3.3-35 requires the construction contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide food service in a consistent manner.

- Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.

Response: The Project does not include vehicles engaged in drayage. Nevertheless, the Project will comply with state regulations on the transition of heavy-duty trucks to zero-emission technologies.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.

Response: Mitigation Measure 3.3-25 requires all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) to be electric or zero-emission vehicles and requires Costco to provide on-site electrical charging facilities to adequately service such electric vehicles.

- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.

Response: The applicant is the sole owner and operator with no tenants. Costco-owned light duty vehicles will be electric. For more information, refer to the Costco Sustainability website (https://www.costco.com/sustainability-introduction.html).

- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.

Response: Mitigation Measure 3.3-22 requires Costco to take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance more than five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site will be required to be equipped with engine idle shutdown timers and (b) the developer will inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas. Further, Mitigation Measure 3.3-23 requires Costco to train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.

- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.

Response: Mitigation Measure 3.3-22 requires the developer to inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.

- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.

Response: Mitigation Measure 3.3-3 requires Costco to generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site, such as solar photovoltaic panels on the roofs of the buildings or elsewhere on site (e.g., awnings, canopies or "solar trees" in parking area). Mitigation Measure 3.3-4 requires Costco to install a battery storage system with enough capacity to power the project's basic building functions for 48 hours. If the solar photovoltaic system does not fulfill the building's energy needs, Mitigation Measure 3.3-2 requires Costco to supply 100% of project electricity from renewable sources. Mitigation Measure 3.3-5 prohibits natural gas service to the site.

- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.

Response: Mitigation Measure 3.3-3 requires Costco to install solar photovoltaic panels on the roof of buildings and/or elsewhere on site. Costco has also designed project building roofs to accommodate the future installation of solar panels.

- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.

Response: Mitigation Measure 3.3-26 requires Costco to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. The conduit will serve 50% of the number of truck docking stations.

- Running conduit to designated locations for future electric truck charging stations.

Response: Mitigation Measure 3.3-26 requires Costco to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. The conduit will serve 50% of the number of truck docking stations.

- In order to construct electric plugs for electric transport refrigeration units at every dock door and require truck operators with transport refrigeration units to use the electric plugs when at loading docks, the owner of the facility would be required to record a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space.

- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.

Response: Costco has indicated that electrical facilities associated with the Project will be sized to accommodate future installation of charging infrastructure.

- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance).

Response: Mitigation Measure 3.3-29 requires Costco to install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.

- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.

Response: The project will comply with Title 24 electric vehicle (EV) charging requirements, including requirements for the installation of EV charging stations as well as EV capable spaces that will facilitate future expansion of EV charging stations as demand for them increases.

- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.

Response: The surrounding area is designated in the City General Plan for industrial use and significant impacts to sensitive receptors are not anticipated as a result of the Project, as discussed in the DEIR and RDEIR. Costco will comply with local SJVAPCD requirements to minimize impacts to nearby receptors.

- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.

Response: The surrounding area is designated in the City General Plan for industrial use. The EIR has analyzed the potential impacts associated with noise and air quality, including an evaluation of health risks which indicates that health risk impacts would be less than significant.

- Requiring all stand-by emergency generators to be powered by non-diesel fuel.

Response: Mitigation Measure 3.3-6 prohibits the use of diesel generators on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.

- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

Response: Mitigation Measure 3.3-23 requires Costco to train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.

- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.

Response: Mitigation Measure 3.3-20 requires Costco to participate in an existing, agency-run employee rideshare program, such as dibs by the San Joaquin Council of Government or another similar program, and to promote ridesharing among its employees.

- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.

Response: Mitigation Measure 3.3-17 requires Costco to provide secure, indoor (or covered) bicycle parking for employee bicycles at the front entry of each building, and to provide locker/shower facilities for employees who commute via bicycle. Mitigation Measure 3.3-29 requires Costco to install six electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls. Costco will adhere to Building Code requirements pertaining to EV charging facilities.

- Designing to LEED green building certification standards.

Response: The proposed Project will be designed to be LEED-certified equivalent.

- Providing meal options onsite or shuttles between the facility and nearby meal destinations.

Response: Mitigation Measure 3.3-21 requires Costco to provide food and drink service for sale onsite to provide meal options to operations employees in a consistent manner.

- Posting signs at every truck exit driveway providing directional information to the truck route.

Response: Mitigation Measure 3.3-24 requires Costco to designate efficient truck routes for trucks owned and operated by Costco. Additionally, Costco has committed to posting signs at the designated exit points to the public street for trucks and service vehicles to inform drivers that trucks are not allowed in residential neighborhoods and to providing information to both owned and non-owned truck operators on truck access routes to and from the warehouse facility.

- Improving and maintaining vegetation and tree canopy for residents in and around the project area.

Response: Mitigation Measure 3.3-8 requires Costco to install and maintain perimeter landscaping that includes vegetation and a tree canopy (which may include structural solar canopies).

- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

Response: Costco will comply with applicable laws and regulations, including those referenced.

- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.

Response: The US EPA SmartWay program is a voluntary public-private program intended to assist with the tracking, documenting, and sharing of information about fuel usage and freight emissions across supply chains. In particular, freight shippers, carriers, logistics companies, and other stakeholders can partner with EPA to provide information on logistics operations to identify how to best meet sustainability goals. This measure is not applicable to the Project, as Costco's operations are not similar to that of a logistics center or freight carrier. Additionally, the Project is not expected to serve tenants, as Costco is the sole owner/operator of this site.

- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

Response: Mitigation Measure 3.3-23 requires Costco to train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.

- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

Response: The Carl Moyer Program and Voucher Incentive Program are two examples of incentive funding opportunities intended to encourage the replacement of older heavy-duty diesel to cleaner or zero-emission alternatives earlier than what could be achieved through regulation alone. While the Project is not expected to serve tenants as Costco is the sole owner/operator of this site, Costco is committed to the transition of its fleet to cleaner equipment.

VI. Noise Impacts Analysis and Mitigation

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.

Response: There are no residential "neighborhoods" in the immediate area of the Project site. However, there are three existing rural/farm residences located on the adjacent parcel to the west. An additional existing rural/farm residence is located farther away from the Project site to the southeast. As discussed in chapter 3.11 of the EIR, operational noise from the Project will not result in any impacts to the residence to the southeast. While there will be occasional impacts from operational noise to the closest of the three residences to the west, Mitigation Measure 3.11-2 requires the construction of a minimum 6-foot tall sound wall and/or landscaped berm along the western Project boundary to reduce potential operational noise impacts during Project operation. Noise barrier walls will be constructed of concrete masonry units, earthen berms, or any combination of these materials. Furthermore, the owner of the adjacent parcel to the west containing those three rural/farm residences submitted an application to the City of Tracy (A/P21-0001 D21-0020) seeking approvals to construct an industrial warehouse project. If approved, those existing rural/farm residences and outbuildings would be removed and the identified mitigation measure would not be necessary or required.

- Planning and enforcing truck routes that avoid passing sensitive receptors.

Response: Signs will be posted at the designated exit points to the public street for trucks and service vehicles to inform drivers that trucks are not allowed in residential neighborhoods. In addition, Costco has committed to providing information to both owned and non-owned trucks on truck access routes to and from the warehouse facility.

- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.

Response: Costco has committed to coordinating with the construction contractor to locate on-site construction equipment as far as possible from sensitive receptors. The EIR has analyzed the potential impacts associated with construction noise and air quality; the RDEIR p. 3.3-33 concludes that the Project's construction-related pollutant emissions impacts would be less than significant, and DEIR p. 3.11-16 concludes that the Project's construction-related noise impacts would be less than significant with the implementation of mitigation measures.

- Verifying that construction equipment has properly operating and maintained mufflers.

Response: Mitigation Measure 3.11-1 requires all construction equipment powered by internal combustion engines to be muffled and maintained.

- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier

Response: Mitigation Measure 3.11-1 requires all construction equipment powered by internal combustion engines to be muffled and maintained. The DEIR, p. 3.11-16, concluded that with implementation of Mitigation Measure 3.11-1, temporary construction noise impacts would be less than significant.

- Limiting operation hours to daytime hours on weekdays.

Response: Typical operation of the facility is between 4 a.m. to 11 p.m. daily. The EIR assumes such operations such that all analyses and conclusions within the EIR take the full operation into account.

- Paving roads where truck traffic is anticipated with low noise asphalt.

Response: DEIR p. 3.11-16 concludes that impacts resulting at existing receptors from increased traffic noise would be considered less-than-significant.

- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

Response: The surrounding area is designated in the City General Plan for industrial use. However, the EIR fully analyzes operational noise impacts and includes mitigation for project noise that could be audible beyond the property line.

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.

Response: Designated truck routes will be identified and provided to trucks owned and operated by Costco and also provided to independent trucks with the preferred circulation routes to avoid residential neighborhoods. In addition, signs will be posted at the designated exit points to the public street for trucks and service vehicles to provide additional information to further limit trucks from utilizing routes that could impact residential neighborhoods.

- Installing signs in residential areas noting that truck and employee parking is prohibited.

Response: Costco intends to post signs onsite indicating that all parking of trucks and employee vehicles must be conducted on-site and not within the surrounding community. Furthermore, the site plan includes sufficient parking for all project needs.

- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and

parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

Response: Designated truck routes will be identified and provided to trucks owned and operated by Costco and also provided to independent trucks with the preferred circulation routes to avoid residential neighborhoods. In addition, signs will be posted at the designated exit points to the public street for trucks and service vehicles to provide additional information to further limit trucks from utilizing routes that could impact residential neighborhoods. As described in other responses, adequate truck queuing space would be provided onsite and the site plan includes sufficient parking for truck and employee use.

- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.

Response: At this time, there is no transit within the vicinity of the project due to lack of rider demand. A 12' Class 1 bike lane is located on the north side of West Schulte Road and crosswalks are included at the Intersection of Bud Lyons Way to the project to provide for safe pedestrian crossing.

- Consulting with the local public transit agency and securing increased public transit service to the project area.

Response: At this time, no transit route exists along W. Schulte Rd or in the vicinity of the project site due to inadequate rider demand to support a transit route.

- Designating areas for employee pickup and drop-off.

Response: The proposed development locates employee parking at the north end of the site near the office entrances and away from the truck parking and circulation areas. Employee drop off and pick up would occur within the employee lot.

- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.

Response: A transportation impact analysis (traffic study) of the proposed development was performed by the City. The study identified no traffic safety impacts resulting from the project. The traffic study identified transportation infrastructure improvements to address the effects of the project on the transportation network, including signal timing changes and roadway restriping.

- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.

Response: Proposed access is on W. Schulte Rd, a four-lane parkway, with development in the vicinity of the project composed of agricultural land and light industrial facilities similar to that of the proposed project. Limited residential uses are located on parcels to the west and southeast of the project site, but no homes are directly located on W. Schulte Road.

- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.

Response: Trucks accessing the site would travel from the nearby I-580/Patterson Pass Rd interchange along W. Schulte Rd and from the I-205/International Pkwy interchange along Mountain House Pkwy-International Blvd and W. Schulte Rd. These direct routes from the freeways serve the light industrial uses in this area of Tracy and are away from neighborhoods and other such areas with concentrations of sensitive receptors.

- Constructing roadway improvements to improve traffic flow.

Response: A transportation impact analysis (traffic study) of the proposed development was performed by the City. The traffic study identified transportation infrastructure improvements to address the effects of the project on the transportation network, including signal timing changes and roadway restriping. In addition, the project will improve W Schulte Rd along the project frontage.

- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

Response: Mitigation Measure 3.13-2 requires that, prior to the start of construction, Costco must prepare and submit a Construction Traffic Control Plan. Such a plan will include locations of equipment staging, material stockpiles, proposed road closures, and hours of operation to minimize traffic impacts.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

- Appointing a compliance officer who is responsible for implementing all mitigation measures and providing contact information for the compliance officer to the lead agency, to be updated annually.

Response: Costco has committed to identifying a compliance employee who will track and monitor mitigation measures approved with the project. Contact information of the compliance staff member will be provided to the City on an annual basis.

- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.

Response: Costco will comply with laws and regulations, including those of the SJVAPCD that require off-setting emissions, as well as with the mitigation measures identified in the EIR as being necessary to minimize or alleviate significant environmental effects.

- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.

Response: Mitigation Measure 3.13-2 requires Costco to prepare a Construction Traffic Control Plan that will include provisions for street sweeping to remove construction-related debris on public streets. Costco will also implement fugitive dust control measures consistent with SJVAPCD regulations.

- Directing all lighting at the facility into the interior of the site.

Response: Lighting will be designed to be directed to the interior of the site so as to limit light spillage onto adjacent properties.

- Using full cut-off light shields and/or anti-glare lighting.

Response: Lighting will use light shields and/or anti-glare lighting.

- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.

Response: Mitigation Measure 3.3-8 requires Costco to maintain perimeter landscaping that includes vegetation and a tree canopy. Mitigation Measure 3.3-14 requires Costco to devise and implement a property maintenance plan during Project operation that includes sweeping parking lots regularly to remove road dust, tire wear, brake dust, and other contaminants.

- Using cool pavement to reduce heat island effects.

Response: The project has been designed to shade 50% of the employee vehicle parking area pavement per CalGreen requirements to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.

Response: The project has been designed to shade 50% of the employee vehicle parking area pavement per CalGreen requirements to reduce heat island effects.

- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.

Response: The project includes an air-conditioned employee break area/lounge within the warehouse portion of each building. The break area/lounge will include bathrooms and food vending machines. In addition, one outside break area at each building will provide outdoor space with shade trees, seating areas, and tables.

- Designing skylights to provide natural light to interior worker areas.

Response: Costco has indicated that it will evaluate the potential for skylights to be placed on the roofs, but any skylights must be coordinated with the installation of solar panels, which are planned to offset carbon emissions and are considered to have a higher level of importance over skylights.

- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

Response: Mitigation Measure 3.3-15 requires Costco to install High Efficiency MERV filters within the HVAC systems. The project includes climate control and air filtration within the office areas, employee break areas, and within the warehouse space for employee comfort.

Response G-23: The commentor provides a list of suggested mitigation measures. As previously stated under comment response G-6, a total of 35 new air quality-related mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR, many of which overlap with the suggested mitigation measures listed in this Appendix item. See comment response to comment G-6 for further detail.

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

November 1, 2022

Genevieve Federighi
City of Tracy
Planning Division
333 Civic Center Plaza
Tracy, CA 95376

Project: Draft Environmental Impact Report for Tracy Costco Depot Annex Project

District CEQA Reference No: 20221332

Dear Mr. Federighi:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (Draft EIR) from the City of Tracy (City) for the project mentioned above. Per the Draft EIR, the project consists of the construction and operation of two Costco warehouse buildings totaling approximately 1,745,052 square feet (Project). Building 1 will consist of 543,326 square feet and will serve as an additional storage for high-turnover merchandise processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor (RTV) facility for large items returned to a Costco warehouse. Building 2 will consist of 1,201,726 square feet and will serve as a Direct Delivery Center (DDC), which is an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery. The Project is located at 16000 West Schulte Road in Tracy, CA. H-1

The District offers the following comments regarding the Project:

1) Project Related Emissions

1a) Construction Emissions

The District recommends, to reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment, including the latest tier equipment. H-2

Samir Sheikh
Executive Director/Air Pollution Control Officer

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

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

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

www.valleyair.org www.healthyairliving.com

1b) Operational Emissions

Per Appendix B-1 (*CalEEMod Outputs*) of the Draft EIR, the California Emissions Estimator Model (CalEEMod) analysis includes a 6.6 mile trip length for quantifying Project operational emissions from Heavy-Heavy Duty (HHD) truck travel. The Project consists of an ecommerce distribution center which is expected to result in approximately 1,224 HHD truck trips per day (page 3.3-31 of Draft EIR), that generally travel further distances (e.g. trip length) for distribution. Without sufficient project-specific justification in the Draft EIR to support the 6.6 mile trip length, the analysis may be underestimating the Project's operational emissions. Therefore, the District recommends the Draft EIR be revised to either justify the use of a 6.6 mile trip length for this Project or reflect an appropriate trip length distance that is supported by project-specific factors and include a qualitative discussion in the Draft EIR for consistency. H-3

2) <u>Recommended Mitigation to Reduce Operational Air Quality Impacts</u>

Per the Draft EIR, specifically Table 3.3-12 (*Operational Project Generated Emissions, Tons Per Year – Mitigated*) demonstrates Project operational emissions are expected to exceed the District's significance thresholds. Therefore, the District recommends the Draft EIR be revised to include a Voluntary Emission Reduction Agreement (VERA) for this Project.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of old farm tractors. H-4

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document

includes an assessment of the feasibility of implementing a VERA. H-4 cont'd

3) Industrial/Warehouse Emission Reduction Strategies

The District recommends the City consider the feasibility of incorporating emission reduction strategies that can reduce potential harmful health impacts, such as those listed below:

- Ensure solid screen buffering trees, solid decorative walls, and/or other natural ground landscaping techniques are implemented along the property line of adjacent sensitive receptors
- Orient loading docks away from sensitive receptors unless physically impossible
- Locate loading docks a minimum of 300 feet away from the property line of sensitive receptor unless dock is exclusively used for electric trucks
- Incorporate signage and "pavement markings" to clearly identify on-site circulation patterns to minimize unnecessary on-site vehicle travel
- Locate truck entries on streets of a higher commercial classification H-5
- Ensure all portions of roof tops that are not covered with solar panels are constructed to have light colored roofing material with a solar reflective index of greater than 78
- Ensure rooftop solar panels are installed and operated to supply 100% of the power needed to operate all non-refrigerated portions of the development project
- Ensure power sources at loading docks for all refrigerated trucks have "plugin" capacity, which will eliminate prolonged idling while loading and unloading goods
- Incorporate bicycle racks and electric bike plug-ins
- Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Prohibit the use of non-emergency diesel-powered generators during construction
- Inform the project proponent of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the Project

4) Truck Routing

Truck routing involves the assessment of which roads HHD trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors. The Project consists of an ecommerce distribution center, which is expected to result in an increased amount of H-6

truck trips.

The District recommends the City evaluate HHD truck routing patterns for the Project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality. H-6 cont'd

5) Reduce Idling of Heavy-Duty Trucks

The goal of this strategy is to limit the potential for localized PM2.5 and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel exhaust from idling has the potential to impose significant adverse health and environmental impacts.

The Draft EIR includes measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) in order to limit the amount of idling, especially near sensitive receptors. Since the Project consists of an ecommerce distribution center, which is expected to result in an increased amount of truck trips, the District recommends the City consider the feasibility of implementing a more stringent 3-minute idling restriction and requiring appropriate signage and enforcement of idling restrictions. H-7

6) Electric On-Site Off-Road and On-Road Equipment

Since the Project consists of an ecommerce distribution center, the Project may have the potential to result in increased use of off-road equipment (e.g., forklifts) and on-road equipment (e.g., mobile yard trucks with the ability to move materials). The District recommends that the Draft EIR include requirements for project proponents to utilize electric or zero emission off-road and on-road equipment. H-8

7) Vegetative Barriers and Urban Greening

There are sensitive receptors (e.g. residence) located adjacent to the Project site. The District suggests the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors.

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the update of gaseous H-9

pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery. H-9 cont'd

8) On-Site Solar Deployment

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the City consider incorporating solar power systems as an emission reduction strategy for the Project. H-10

9) Electric Vehicle Chargers

To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District recommends that the City and project proponents install electric vehicle chargers at project sites, and at strategic locations. H-11

Please visit www.valleyair.org/grants/chargeup.htm for more information.

10) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes. H-12

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm. To identify other District rules or regulations that apply to future projects, or to obtain information about

District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (209) 557-6446. H-12 cont'd

10a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT). H-13

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (209) 557-6446.

10b) District Rule 9510 - Indirect Source Review (ISR)

The Project is subject to District Rule 9510 because it will receives a project-level discretionary approval from a public agency and will equal or exceed 25,000 square feet of light industrial space.

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions. H-14

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA application for this Project. Please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510. One AIA application should be submitted for the entire Project. It is preferable for the applicant to submit an AIA application as early as possible in the City's

approval process so that proper mitigation and clean air design under ISR can be incorporated into the City's analysis.

Information about how to comply with District Rule 9510 can be found online at: http://www.valleyair.org/ISR/ISRHome.htm. H-14 cont'd

The AIA application form can be found online at: http://www.valleyair.org/ISR/ISRFormsAndApplications.htm.

District staff is available to provide assistance and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

10c) District Rule 9410 (Employer Based Trip Reduction)

The Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees. H-15

Information about District Rule 9410 can be found online at: www.valleyair.org/tripreduction.htm.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

10d) District Rule 4601 (Architectural Coatings)

The Project may be subject to District Rule 4601 since it may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: http://www.valleyair.org/rules/currntrules/r4601.pdf H-16

10e) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, H-17

specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950. H-17 cont'd

The application for both the Construction Notification and Dust Control Plan can be found online at:
https://www.valleyair.org/busind/comply/PM10/forms/DCP-Form.docx

Information about District Regulation VIII can be found online at:
http://www.valleyair.org/busind/comply/pm10/compliance_pm10.htm

10f) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). H-18

11) District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent. H-19

If you have any questions or require further information, please contact Harout Sagherian by e-mail at Harout.Sagherian@valleyair.org or by phone at (559) 230-5860.

Sincerely,

Brian Clements
Director of Permit Services



For: Mark Montelongo
Program Manager

Response to Letter H: San Joaquin Valley Air Pollution Control District

Response H-1: The commentor summarizes the proposed Project. This comment serves as an introduction to the comment letter.

Response H-2: Mitigation Measure 3.3-30 would require the project applicant to ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines. Note that the Project construction emissions are less than the Air District thresholds without mitigation, this mitigation measure is not required. Furthermore, various air quality mitigation measures have been added to the Final EIR. Specifically, the following changes have been made to pages 3.3-32 through page 3.3-35 of Section 3.3: Air Quality of the Recirculated Draft EIR (these changes are provided in revision marks with <u>underline for new text</u> and ~~strike out for deleted text~~.):

> MITIGATION MEASURE(S)
>
> ***Mitigation Measure 3.3-1:*** *During Project operation, operators of heavy-duty trucks that travel to and from the Project site are required to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment.*
>
> <u>***Mitigation Measure 3.3-2****: The Project applicant shall supply 100% of project electricity from renewable sources. The Project applicant shall procure power from a combination of onsite solar generation and direct source renewable purchased energy; however, at no time shall the Project site be supplied with any greater than 3.4 megawatts of direct source renewable purchased energy.*</u>
>
> <u>***Mitigation Measure 3.3-3****: The Project applicant shall generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site. Such facilities may include solar photovoltaic panels on the roofs of the buildings or elsewhere on site (e.g., awnings, canopies or "solar trees" in parking area).*</u>
>
> <u>***Mitigation Measure 3.3-4****: The Project shall be designed and constructed to allow future expansion of solar facilities on site as electricity demand increases. The Project applicant shall, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.*</u>
>
> <u>***Mitigation Measure 3.3-5****: The Project applicant shall ensure that no natural gas service shall be supplied to the site.*</u>
>
> <u>***Mitigation Measure 3.3-6****: The Project applicant shall ensure that diesel generators shall not be used on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.*</u>
>
> <u>***Mitigation Measure 3.3-7****: The Project applicant shall ensure that, during Project operation, for trucks owned or operated by Costco that access the site, only ultra-low sulfur diesel fuel or biodiesel blended with sulfur content of 15 ppm or less shall be used, so long as such fuel is commercially available.*</u>

Mitigation Measure 3.3-8*: The Project applicant shall install and maintain perimeter landscaping that includes vegetation and a tree canopy (which may include structural solar canopies).*

Mitigation Measure 3.3-9*: The Project applicant shall ensure the Project building(s) exceeds applicable Title 24 Building Envelope Energy Efficiency Standards by at least 1%.*

Mitigation Measure 3.3-10*: The Project applicant shall install Energy Star certified appliances or equivalent.*

Mitigation Measure 3.3-11*: The Project applicant shall install energy efficient lighting that meets or exceeds Title 24 requirements.*

Mitigation Measure 3.3-12*: The Project applicant shall install roofs with a reflectivity factor of at least 78 to the extent that such roofs do not interfere with photovoltaics installed on roofs.*

Mitigation Measure 3.3-13*: The Project applicant shall ensure that construction plans require that architectural and industrial maintenance coatings (e.g., paints) applied on the Project site shall be consistent with a VOC content of <50 g/L. However, the Project applicant shall not be expected to exercise control over materials painted offsite by a third party.*

Mitigation Measure 3.3-14*: The Project applicant shall devise and implement a property maintenance plan during Project operation that includes sweeping parking lots regularly to remove road dust, tire wear, brake dust, and other contaminants.*

Mitigation Measure 3.3-15*: The Project applicant shall Install High Efficiency MERV filters within the HVAC systems.*

Mitigation Measure 3.3-16*: The Project applicant shall install a separate employee parking area accessible by its own curb cut entry and a flashing lit sidewalk that connects the employee parking with the buildings.*

Mitigation Measure 3.3-17*: The Project applicant shall provide bicycle parking for employee bicycles at the front entry of each building. Bicycle parking shall be secure and shall be located indoors or be covered. Provide locker/shower facilities for employees who commute via bicycle.*

Mitigation Measure 3.3-18*: The Project applicant shall provide electrical outlets for charging of employee e-bikes.*

Mitigation Measure 3.3-19*: The Project applicant shall provide no more than the minimum number of parking spaces required by City code.*

Mitigation Measure 3.3-20*: The Project applicant shall participate in an existing, agency-run employee rideshare program, such as dibs by the San Joaquin Council of Government or another similar program, and promote ridesharing among its employees.*

Mitigation Measure 3.3-21*: The Project applicant shall provide food and drink service for sale onsite to provide meal options to operations employees in a consistent manner.*

Mitigation Measure 3.3-22*: The Project applicant shall take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks*

owned or operated by Costco that access the project site shall be required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.

***Mitigation Measure 3.3-23**: The Project applicant shall train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.*

***Mitigation Measure 3.3-24**: The Project applicant shall Designate efficient truck routes for trucks owned and operated by Costco.*

***Mitigation Measure 3.3-25**: The Project applicant shall ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) shall be electric or zero-emission vehicles. The Project applicant shall provide on-site electrical charging facilities to adequately service such electric vehicles.*

***Mitigation Measure 3.3-26**: The Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).*

***Mitigation Measure 3.3-27**: The Project applicant shall ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs).*

***Mitigation Measure 3.3-28**: The Project applicant shall provide priority parking for employee carpool vehicles.*

***Mitigation Measure 3.3-29**: The Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.*

***Mitigation Measure 3.3-30**: The Project applicant shall ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines.*

***Mitigation Measure 3.3-31**: The Project applicant shall provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators shall be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%.*

***Mitigation Measure 3.3-32**: The Project applicant shall ensure that heavy-duty diesel hauling trucks that access the Project site for construction shall be model year 2010 or newer, so long as such trucks are reasonably available.*

***Mitigation Measure 3.3-33**: The Project applicant shall prepare and implement a construction traffic control plan during the Project's construction phase.*

***Mitigation Measure 3.3-34**: The Project applicant shall, during construction, install signage on any unpaved primary construction accessways onsite on the project site to limit vehicle speeds to no more than 15 mph.*

***Mitigation Measure 3.3-35**: Project construction plans and specifications shall require the contractor to establish one or more locations for food or catering truck service to*

construction workers and to cooperate with food service providers to provide food service in a consistent manner.

***Mitigation Measure 3.3-36**: The Project applicant shall employ the following strategies during construction to minimize noise:*

(a) Concrete delivery vehicles shall have low frequency back up beepers that meet Cal-OSHA requirements.

(b) All fleet equipment shall have mufflers and noise-minimizing devices.

(c) Personal radios shall not be allowed onsite.

Response H-3: Based on this and other comments, the HHD truck travel trip length has been revised within the Recirculated Draft EIR to be 29 miles. Specifically, heavy-duty operational truck trips were assumed to travel 29 miles per one-way trip, on average, consistent with San Joaquin County's travel demand model.

Response H-4: A VERA is a voluntary emissions reduction program, and therefore is not required to be implemented. Nevertheless, the Final EIR has added 35 new mitigation measures associated with reductions in air quality emissions. See the comment Response H-2, above, for the full list of such additional mitigation measures. Furthermore, the Project is also required to implement Rule 9510. As part of Rule 9510, a development project must reduce construction NOx and PM10 emissions by 20% and 45%, respectively, as well as reduce operational NOx and PM10 emissions by 33.3% and 50%, respectively, compared to Project unmitigated emissions. Emission reduction requirements can be satisfied through a combination of project design elements and/or off-site fees paid directly to the District to fund off-site emission reduction projects. Costco will comply with all requirements of Rule 9510.

Response H-5: The applicant has considered the feasibility of the emissions reduction strategies that are listed by the commentor. Based on this comment, as well as other comments, additional mitigation measures have been added to the Recirculated Draft EIR in this document. See Chapter 3.3. Specifically, 35 new mitigation measures have been added to pages 3.3-32 through 3.3-35 of the Draft EIR (in addition to the Mitigation Measure 3.3-1, which was included in the Recirculated Draft EIR), as provided in comment Response H-2, above. These mitigation measures incorporate the vast majority of the applicant's proposed Project sustainability features as mitigation measures. Please refer to the comment responses to Comment Letter K and Comment Letter I, for further detail.

Specifically, the recommendations have been addressed as follows:

- With regard to the recommendation to include screen buffering trees or solid decorative walls, the new Mitigation Measure 3.3-8 requires the Project applicant to install and maintain perimeter landscaping that includes vegetation and a tree canopy.
- With regard to the recommendation to orient loading docks away from sensitive receptors, while no specific mitigation measure has been added to reflect this

recommendation, other mitigation measures that would reduce the impact on sensitive receptors have been added, such as Mitigation Measure 3.3-22, which requires the Project applicant to take reasonable measures to restrict truck idling.

- With regard to the recommendation to locate loading docks away from the property line of sensitive receptors unless a dock is used for electric trucks, additional mitigation measures have been added to reduce potential impacts associated with sensitive receptors, such as Mitigation Measure 3.3-22, which requires the Project applicant to take reasonable measures to restrict truck idling. Moreover, Mitigation Measure 3.3-27 requires the Project applicant to ensure that trucks owned or operated by Costco that access the Project site do not include TRUs. Further, Mitigation Measure 3.3-32 requires the Project applicant to ensure that heavy-duty diesel hauling trucks that access the Project site for construction shall be model year 2010 or newer, so long as such trucks are reasonably available.
- With regard to the recommendation to clearly identify on-site circulation patterns, although this is not included as a mitigation measure, this is anticipated to be incorporated into Project site design. Moreover, truck idling would be limited on-site through Mitigation Measure 3.3-22, which requires the Project applicant to take reasonable measure to restrict truck idling.
- With regard to the recommendation to located truck entries on streets of a higher commercial classification, although this is not included as a mitigation measure, the entry locations for the Project site have been designed according to all applicable engineering requirements. Moreover, Mitigation Measure 3.3-24 requires the Project applicant to designated efficient truck routes for trucks owned and operated by Costco.
- With regard to the recommendation to ensure roof tops include solar panels and/or to include light colored roofing materials, Mitigation Measure 3.3-2 requires the Project applicant to supply 100% of project electricity from renewable sources, including from on-site solar. Additionally, Mitigation Measure 3.3-3 requires the Project applicant to generated approximately 3.8 megawatts of renewable electricity from solar facilities located on site. Additionally Mitigation Measure 3.3-4 requires the Project site to be designed and constructed to allow future expansion of solar facilities on site as electricity demand increases. Lastly, Mitigation Measure 3.3-12 requires the Project applicant shall install roofs with a reflectivity factor of at least 78 to the extent that such roofs do not interfere with photovoltaics installed on roofs.
- With regard to the recommendation to ensure power sources at loading docks for all refrigerated trucks have “plugin” capacity, Mitigation Measure 3.3-26 requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit is required to be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations). Additionally,

Mitigation Measure 3.3-27 required the Project applicant to ensure that trucks owned or operated by Costco that access the Project site do not include active Transport Refrigeration Units (TRUs).

- With regard to the recommendation to incorporated bicycle racks and electric bike plug-ins, Mitigation Measure 3.3-17 requires the Project applicant to provide bicycle parking for employee bicycles. Additionally, Mitigation Measure 3.3-18 requires the Project applicant to provide electrical outlets for charging of employee e-bikes.
- With regard to the recommendation to use of low-VOC coatings, Mitigation Measure 3.3-13 requires the Project applicant to ensure that construction plans require that architectural and industrial maintenance coatings (e.g., paints) applied on the Project site shall be consistent with a VOC content of <50 g/L.
- With regard to the recommendation to prohibit the use of non-emergency diesel-powered generators during construction, Mitigation Measure 3.3-31 requires the Project applicant is required to provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators must be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%.
- With regard to the recommendation to inform the Project proponent of the incentive program to reduce air emissions from the Project, although a specific mitigation measure in this regard is not included, the Project proponent has been made aware of the various incentive programs available to reduce Project air emissions.

Response H-6: Fehr & Peers evaluated HHD truck routing patterns according to their latest modeling software and the applicable regional travel demand model(s).

It should also be noted that the Project site is located close to major freeways and there are no neighborhoods between the closest freeway exits and the project site. Furthermore, Mitigation Measure 3.3-24, which has been added to the RDEIR as part of this Final EIR, would require the Project applicant to designate efficient truck routes for trucks owned and operated by Costco.

Response H-7: On July 26, 2007, the CARB adopted a regulation to reduce DPM and NOx emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. The regulation limits idling to no more than five consecutive minutes, requires reporting and labeling, and requires disclosure of the regulation upon vehicle sale.

Additionally, Mitigation Measure 3.3-22, which has been added to the Recirculated Draft EIR, requires the Project applicant to take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site shall be required to be equipped with

engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.

Separately, Mitigation Measure 3.3-23 requires the Project applicant to train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.

Response H-8: Mitigation Measure 3.3-25, which has been added to the Recirculated Draft EIR, requires the Project applicant to ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) must be electric or zero-emission vehicles, and that the Project applicant must also provide on-site electrical charging facilities to adequately service such electric vehicles.

Response H-9: Mitigation Measure 3.3-8, which has been added to the Recirculated Draft EIR, requires the Project applicant shall install and maintain perimeter landscaping that includes vegetation and a tree canopy (which may include structural solar canopies).

Response H-10: Mitigation Measure 3.3-3, which has been added to the Recirculated Draft EIR, requires the Project applicant to generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site. Such facilities may include solar photovoltaic panels on the roofs of the buildings or elsewhere on site (e.g., awnings, canopies or "solar trees" in parking area). Additionally, Mitigation Measure 3.3-2 requires the Project applicant to supply 100% of project electricity from renewable sources. Additionally, this mitigation measure requires the Project applicant to procure power from a combination of onsite solar generation and direct source renewable purchased energy.

Response H-11: Mitigation Measure 3.3-29, which has been added to the Recirculated Draft EIR, requires the Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.

Response H-12: The commentor provides a list of Air District rules and regulations that may apply to the Project. The Project will comply with applicable rules and regulations.

Response H-13: The commentor identifies District Rules 2010 and 2201 as rules that may apply to the Project. The Project will comply with applicable rules and regulations.

Response H-14: The commentor identifies District Rule 9510 – Indirect Source Review (ISR) as a rule that applies to the Project. The Project will comply with applicable rules and regulations.

Response H-15: The commentor identifies District Rule 9410 – Employer Based Trip Reduction as a rule that may apply to the Project. The Project will comply with applicable rules and regulations.

Response H-16: The commentor identifies District Rule 4601 – Architectural Coatings as a rule that may apply to the Project. The Project will comply with applicable rules and regulations.

Response H-17: The commentor identifies District Regulation VIII (Fugitive PM10 Prohibitions) as a regulation that may apply to the Project. The Project will comply with applicable rules and regulations.

Response H-18: The commentor states that other rules and regulations may apply to the Project, such as Rule 4102 (Nuisance) and Rule 4641 (Cutback, Clow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). The Project will comply with applicable rules and regulations.

Response H-19: The commentor requests their letter be provided to the Project proponent. This comment letter has been provided to the Project proponent.

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

February 5, 2024

Genevieve Federighi
Associate Planner
City of Tracy Development Services
333 Civic Center Plaza
Tracy, CA 95376

VIA EMAIL TO:
Genevieve.Federighi@cityoftracy.org

Subject: Comments on Costco Depot Annex Revised EIR (SCH NO. 2020080531)

Dear Ms. Federighi,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Costco Depot Annex Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. I-1

1.0 Summary

The project proposes the construction and operation of of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a Direct Delivery Center. The two buildings (approximately 543,526 sf for Building 1 and 1,193,198 sf for Building 2) total approximately 1,736,724 sf on the Project site. The smaller Building 1 is anticipated to serve as the annex by providing additional storage for high-turnover merchandise processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a Direct Delivery Center (DDC), an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery through Market Delivery Operations (MDO) located in various smaller cities in the Northern California region. DDC warehouses distribute ordered goods to the MDOs for delivery (by appointment) to the members. I-2

The Project site is designated as Agriculture by San Joaquin County's General Plan Land Use Map and is zoned as AG-40 Agriculture by the County. The site currently has a City General Plan land

use designation of Industrial (I). The San Joaquin County Local Agency Formation Commission (LAFCO) will require the Project site to be pre-zoned by the City of Tracy in conjunction with the proposed annexation. The City's pre-zoning will include the Light Industrial (M-1) zoning designation for Project site. Additionally, the proposed Project would result in the annexation of the Annexation Area into the City of Tracy. I-2 cont'd

2.0 Project Description

The Recirculated EIR does not include a floor plan, grading plan, elevations, or detailed site plan for the proposed project. The basic components of a Planning Application include a detailed site plan, floor plan, grading plan, elevations, and written narrative. The site plan provided in Figure 2.0-4 has been edited to remove pertinent information from public review during the CEQA process. Figure 2.0-4 does not provide any detailed information such as the earthwork quantity notes, site coverage, floor area ratio, etc. All of these items are standard information that are depicted on a site plan created by an Architect or designer. The edited version of the site plan inserted for public review is meaningless and provides no useful information.

I-3

The Recirculated EIR has excluded this information and all required application items from public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as these documents contribute directly to analysis of the problem at hand. Providing a grading plan is vital as the Recirculated EIR does not provide any meaningful evidence to support the claim that, "The project is designed to have balanced earthwork with no offhaul of excess or import of additional soil needed. The anticipated earthwork quantity will be approximately 424,280 cubic yards of both cut and fill for the construction of both phases, Buildings 1 and 2, and all of that soil will be maintained/utilized on the project site." There is no method for the public to verify this information. The Recirculated EIR must be revised to include a wholly accurate and unedited full set of plans, including a complete grading plan to determine the amount of soils/materials to be imported/exported from the site. These grading truck hauling trips must be included for analysis in all portions of environmental analysis, including Air Quality, Energy, Greenhouse Gas Emissions, Noise, and Transportation.

3.3 Air Quality

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

The Recirculated EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According I-4

to CalEnviroScreen 4.0, CalEPA s screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project s census tract (6077005207) ranks worse than 53% of the rest of the state overall in pollution burden. The surrounding community, including Kimball High School and residences to the east, and adjacent SB 535 Census Tract 6077005206 (north), bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for groundwater threats. People who live near contaminated groundwater may be exposed to chemicals moving from the soil into the air inside their homes[1]. The census tract ranks in the 88th percentile for hazardous waste impacts. Contamination of air, water and soil near hazardous waste generators and facilities can harm the environment as well as people[2]. The census tract also ranks in the 53rd percentile for contaminated drinking water impacts. Poor communities and people in rural areas are exposed to contaminants in their drinking water more often than people in other parts of the state[3].

I-4 cont'd

The project census tract also ranks in the 61st percentile for ozone burden and the 70th percentile for traffic related impacts, which are attributed to heavy vehicular activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[4]. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births[5].

Further, the census tract is a diverse community including 33% Asian-American, 4% African-American, and 27% Hispanic residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 60% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 59th percentile for incidence of cardiovascular disease and 58th percentile for incidence of low birth weights. The Recirculated EIR does not address that the cumulative impacts of development and environmental impacts in the project area are disproportionately impacting the surrounding communities. The negative environmental, health, and quality of life impacts resulting form a saturation of the industrial, warehousing, and logistics industry in the City have become distinctly inequitable. The severity of significant and unavoidable impacts particularly on the project census tract must be included for analysis as part of a revised EIR. ts.

I-5

[1] OEHHA Groundwater Threats https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats
[2] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[3] OEHHA Contaminated Drinking Water https://oehha.ca.gov/calenviroscreen/drinking-water
[4] OEHHA Air Quality: Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[5] OEHHA Traffic Impacts https://oehha.ca.gov/calenviroscreen/indicator/traffic-density

3.7 Greenhouse Gases, Climate Change and Energy

The State of California lists three approved compliance modeling softwares[6] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod-based modeling used in the Energy Calculations (Appendix B.2 within Appendix B) does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project s significant Energy impacts and fuel consumption to the public and decision makers. Since the Recirculated EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project s significant environmental impacts. This is vital as the Recirculated EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not an approved software. I-6

It must also be noted that the City and/or SJCOG are not listed as a jurisdictions with local energy standards approved by the CA Energy Commission for either the 2019[7] or 2022[8] Energy Code. According to the CA Energy Commission, Local jurisdictions are required to apply to the Energy Commission for approval, documenting the supporting analysis for how the local government has determined that their proposed Standards will save more energy than the current statewide Standards and the basis of the local government s determination that the local standards are cost-effective." Therefore, compliance with the City's General Plan, Sustainability Action Plan, and/or SJCOG's 2018 RTP/SCS does not comply with CA Energy Commission standards or AB 32/SB 32. The Recirculated EIR is misleading to the public and decision makers by stating compliance with these standards when the local jurisdiction standards have not been approved by the CA Energy Commission. A revised EIR must be prepared with adequate analysis of project impacts utilizing an approved modeling software in order to be a reliable informational document in compliance with CEQA. I-7

The Recirculated EIR analyzes the potentially significant impacts from Greenhouse Gas Emissions in a qualitative manner pursuant to CEQA Guidelines Section 15064.4. However, the consistency analysis provided is erroneous and does not demonstrate a good-faith effort, based to the extent I-8

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

[7] Local Ordinances Exceeding the 2019 CA Energy Code https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-3

[8] Local Ordinances Exceeding the 2022 CA Energy Code https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-0

possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from the project and its significance. Table 3.7-5: Consistency With SJCOG s 2022 RTP/SCS[9] only provides analysis with the eight policies within the document and none of the associated implementation strategies. Further, the analysis provided in Table 3.7-5 does not accurately describe the proposed project and its significant impacts, which is erroneous misleading to the public and decision makers. For example, the Recirculated EIR concludes the project does not conflict with Policy 8: Improve the Quality of Life for Residents because the project "would provide additional shopping options for local and regional residents, thereby improving the quality of life for residents." The project is not a retail shopping center or open to the public, so it is unclear how this statement supports the consistency between the proposed project and Policy 8. I-8 cont'd

Additionally, the Recirculated EIR concludes the project does not conflict with Policy 1: Enhance the Environment for Existing and Future Generations and Conserve Energy because the project, "would utilize electricity provided by Pacific Gas & Electric (PG&E) which is required to meet the future year renewable portfolio performance standards. In addition, future development associated with Project implementation would be required to meet the applicable requirements of the 2022 (or more current) Title 24 Building Energy Efficiency Standards." However, as stated above, the Recirculated EIR has not demonstrated that the proposed project meets Title 24 Building Energy Efficiency Standards. The consistency analysis is misleading and does not meaningfully support the conclusion that the proposed project is consistent with the policy. I-9

Further, the Recirculated EIR has excluded analysis of the proposed project with the Strategies within SJCOG's 2022 RTP/SCS, including Strategy 3 to improve air quality by reducing transportation-related emissions, Strategy 4 to improve regional transportation system efficiency, and Strategy 8 to improve major transportation corridors to minimize impacts on rural roads. Due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, and the project's significant and unavoidable Air Quality, GHG, and Transportation (VMT) impacts, the proposed project is directly inconsistent with the Strategies listed above. I-10

Notably, the project will have significant and unavoidable cumulatively considerable environmental impacts to Aesthetics (DEIR), Agricultural Resources (DEIR), Air Quality, Noise (DEIR), and Transportation (VMT) (DEIR), which will degrade the environment and worsen quality of life for residents in Tracy and the region. The project's 25,134 MTCO2e annual emissions during project operations is underestimated in the Recirculated EIR due to inaccurate I-11

[9] SJCOG 2022 RTP/SCS https://www.sjcog.org/608/Adopted-2022-RTPSCS-Plan

modeling, does not further the State s goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050, and obstructs the State from attaining these goals. This is also not consistent with the following Policies and Strategies of the 2022 RTP/SCS:

1. Policy 1: Enhance the Environment for Existing and Future Generations and Conserve Energy
2. Strategy 1: Encourage efficient development patterns that maintain agricultural viability and natural resources
3. Strategy 3: Enhance the connection between land use and transportation choices through projects supporting energy and water efficiency.
4. Strategy 4: Improve air quality by reducing transportation-related emissions
5. Policy 2: Maximize Mobility and Accessibility
6. Strategy 9: Promote safe and efficient strategies to improve the movement of goods.
7. Policy 3: Increase Safety and Security
8. Strategy 9: Facilitate projects that reduce the number of and severity of traffic incidents
9. Policy 4: Preserve the Efficiency of the Existing Transportation System
10. Strategy 13: Support the continued maintenance and preservation of the existing transportation system
11. Policy 8: Improve the Quality of Life for Residents
12. Strategy 30: Enhance public health through active transportation projects

I-11 cont'd

4.0 Other CEQA Considerations

4.4 Growth-Inducing Impacts

The analysis of growth-inducement through the removal of development obstacles must be revised to discuss the project's required annexation of the Annexation Area into the City of Tracy. There is no analysis of the proposed project with the City's 2019 Municipal Services Review[10] (MSR). The MSR reviews the City's ability to provide services to residents and businesses within its existing boundaries as well as the future residents and businesses within 10-Year and 30-Year Horizons by providing land use analysis, buildout projections, and growth forecasts. Table 2-7: Development Anticipated Within Years 1-10 and Within Years 11-30 of the City's 2019 Municipal Services Review[11] (MSR) states that Planning Subarea 1 (which encompasses the proposed project

I-12

[10] City of Tracy 2019 Municipal Services Review https://www.sjgov.org/docs/default-source/local-agency-formation-commission-documents/municipal-services-and-spheres-of-influence/cities/tracy---july-2019.pdf?sfvrsn=aa988a63_2

[11] City of Tracy 2019 Municipal Services Review https://www.sjgov.org/docs/default-source/local-agency-formation-commission-documents/municipal-services-and-spheres-of-influence/cities/tracy---july-2019.pdf?sfvrsn=aa988a63_2

site) will generate 480 jobs during years 1-10 and 184 jobs during years 11-30. The 10-Year Horizon of the MSR spans from 2019 to 2029 and the 30-Year Horizon addresses 2029 to 2049. The Project Description states that all phases of the project will be constructed within two years of permit issuance. The Project Goals include "Create approximately 150 to 250 full time jobs," which is 52% of the employment growth anticipated and planned during the 10-Year Horizon. Further, the project will generate 1,745 employees utilizing the General Plan EIR's calculation of 1 employee per 1,000 square feet of industrial space. This is more than 2.5 times the 30-Year Horizon of 664 jobs. This information is not discussed or presented for analysis in the Recirculated EIR and must be included as part of a revised and recirculated EIR for public review. A finding of significance must be made as the employment growth generated by the proposed project exceeds the growth capacity of the 2019 Municipal Services Review. I-12 cont'd

The Recirculated EIR has not provided any quantified analysis of the proposed project's employment and population growth in relation to City General Plan buildout, the City's 2019 MSR, or any other growth forecasts. Further, the October 2022 industrial development pipeline's[12] 10,886 employees represents a significant amount of employment growth. The proposed project in combination with the current industrial development pipeline (the October 2022 report may not include all applicable projects, such as those with finished construction) vastly exceeds projected employment growth from the General Plan and 2019 MSR and is a significant portion of its population growth. This number increases exponentially when the City's other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include an accurate cumulative analysis on this topic and include a finding of significance. The Recirculated EIR must also be revised to provide a cumulative analysis of projects approved since General Plan adoption and projects "in the pipeline" to provide an adequate and accurate analysis to determine if the project will exceed the buildout scenario/employment projections of the City's General Plan, 2019 MSR, and SJCOG.

Conclusion

For the foregoing reasons, GSEJA believes the Recirculated EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this I-13

[12] Tracy October 2022 Industrial Development Report
https://www.cityoftracy.org/home/showpublisheddocument/14087/638016799846970000

project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. | I-13 cont'd

Sincerely,



Gary Ho
Blum, Collins & Ho LLP

Attachments:
1. SWAPE Technical Analysis

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

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

February 5, 2022

Gary Ho
Blum Collins LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the Tracy Costco Depot Annex Project (SCH No. 2020080531))

Dear Mr. Ho,

We have reviewed the December 2023 Recirculated Draft Environmental Impact Report ("RDEIR") for the Tracy Costco Depot Annex Project ("Project") located in the City of Tracy ("City"). The Project proposes to construct 1,736,724-square-feet ("SF") of warehouse space, 576 parking spaces, and 600 truck and trailer stalls on the 104.46-acre site. I-14

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

Air Quality

Failure to Provide Complete CalEEMod Output Files

Land use development projects under the California Environmental Quality Act ("CEQA") typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model ("CalEEMod").[1] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be I-15

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

justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are used in calculating the Project's air pollutant emissions and demonstrate which default values are changed. Justifications are provided for the selected values.

According to the RDEIR, CalEEMod Version 2022.1 is relied upon to estimate Project emissions (p. 3.3-26). However, this poses a problem as the version of CalEEMod 2022.1 currently available is described as a "soft release" which fails to provide complete output files.[2] Specifically, the "User Changes to Default Data" table no longer provides the quantitative counterparts to the changes to the default values (see excerpt below) (Appendix A.1, pp. 264-265):

I-15 cont'd

Screen	Justification
Land Use	Land uses consistent with site plan. 103.0 acres total of Development Area.
Construction: Construction Phases	No demolition. Construction phases and phase lengths as provided by Project applicant. 6 days per week of construction activity, as provided by Project applicant. Note that two additional paving phases are included in separate CalEEMod model runs, since CalEEMod only allows one paving phase per model run.
Operations: Fleet Mix	Revised fleet mix to reflect fleet mix provided in Traffic Study (Kimley Horn, 2022). Also trip rates and VMT revised to reflect what is provided in Traffic Study (Kimley Horn, 2022). 29 mile trip length was assumed for HHD vehicles: 17.7478024 trip length (conservative assumption based on largest default CalEEMod assumed trip length value) was assumed for all other vehicles, for a weighted average trip length of 21.37224776 miles. Fleet mix is adjusted to reflect heavy-duty truck mix of 32.21% (as provided by Kimley Horn).
Operations: Consumer Products	Revised General Category consumer products emissions factor to reflect CARB adjustments applied to their Consumer and Commercial Product Survey Emission data, made after the 2008 consumer products emissions factor. Adjustment made to reflect average adjustment factor. See for further detail: https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-emissions-0.0000107
Operations: Vehicle Data	Trip rates revised to reflect that the heavy-duty truck trips would average approximately 29 miles per trip. The trip distances for passenger vehicles provided by the defaults in the CalEEMod model were averaged (weighted) with the heavy-duty truck trip distance of 29 miles. This equals a weighted average travel distance of 21.37224776 miles. Trip rate is 2.177313971251136 and 2.177693824736013 per 1000 sf per day, for each of the two buildings (smaller building and larger building), respectively consistent with what was provided by Kimley Horn.
Construction: Dust From Material Movement	Per Project Applicant, during Grading phase, up to approx. 70,000 cubic yards of soil could be imported. Acres graded represents the default CalEEMod value (note that, according to CalEEMod, "Multiple passes with grading equipment may be required to properly grade a piece of land").
Construction: Off-Road Equipment	Off-road equipment detail as provided by Project applicant.
Construction: Trips and VMT	Hauling trips as provided by Project applicant (note: adjusted upwards to reflect 6 days per week of construction activity).

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

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

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

I-15 cont'd

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

Unsubstantiated Input Parameters Used to Estimate Project Emissions

As previously discussed, the RDEIR relies on CalEEMod Version 2022.1 to estimate the Project's air quality emissions and fails to provide the complete output files required to adequately evaluate model's analysis (p. 3.3-26). Regardless, when reviewing the Project's CalEEMod output files, provided in the Air Quality, Greenhouse Gas, and Energy Appendices ("AQ & GHG Analysis") as Appendix A to the RDEIR, we were able to identify a model input that is inconsistent with information disclosed in the RDEIR. Consequently, the Project's construction and operational emissions may be underestimated. A revised EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

I-16

Incorrect Application of Tier 4 Final Mitigation

Review of the CalEEMod output files demonstrates that the "Poplar South Distribution Center Project - Vehicles and Light Duty Truck Trips" model includes changes to the default off-road equipment parameters (see excerpt below) (Appendix A.1, pp. 265).

I-17

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

Screen	Justification
Land Use	Land uses consistent with site plan. 103.0 acres total of Development Area.
Construction: Construction Phases	No demolition. Construction phases and phase lengths as provided by Project applicant. 6 days per week of construction activity, as provided by Project applicant. Note that two additional paving phases are included in separate CalEEMod model runs, since CalEEMod only allows one paving phase per model run.
Operations: Fleet Mix	Revised fleet mix to reflect fleet mix provided in Traffic Study (Kimley Horn, 2022). Also trip rates and VMT revised to reflect what is provided in Traffic Study (Kimley Horn, 2022). 29 mile trip length was assumed for HHD vehicles; 17.7478024 trip length (conservative assumption based on largest default CalEEMod assumed trip length value) was assumed for all other vehicles, for a weighted average trip length of 21.37224776 miles. Fleet mix is adjusted to reflect heavy-duty truck mix of 32.21% (as provided by Kimley Horn).
Operations: Consumer Products	Revised General Category consumer products emissions factor to reflect CARB adjustments applied to their Consumer and Commercial Product Survey Emission data, made after the 2008 consumer products emissions factor. Adjustment made to reflect average adjustment factor. See for further detail: https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-emissions-i 0.0000107
Operations: Vehicle Data	Trip rates revised to reflect that the heavy-duty truck trips would average approximately 29 miles per trip. The trip distances for passenger vehicles provided by the defaults in the CalEEMod model were averaged (weighted) with the heavy-duty truck trip distance of 29 miles. This equals a weighted average travel distance of 21.37224776 miles. Trip rate is 2.17731397125136 and 2.17769382473601 per 1000 sf per day, for each of the two buildings (smaller building and larger building), respectively, consistent with what was provided by Kimley Horn.
Construction: Dust From Material Movement	Per Project Applicant, during Grading phase, up to approx. 70,000 cubic yards of soil could be imported. Acres graded represents the default CalEEMod value (note that, according to CalEEMod, "Multiple passes with grading equipment may be required to properly grade a piece of land").
Construction: Off-Road Equipment	Off-road equipment detail as provided by Project applicant.
Construction: Trips and VMT	Hauling trips as provided by Project applicant (note: adjusted upwards to reflect 6 days per week of construction activity).

I-17 cont'd

As a result, the model assumes that the Project's off-road construction equipment fleet would meet Tier 4 final emissions standards (see excerpt below) (Appendix A.1, pp. 244-248).

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	8.00	84.0	0.37
Site Preparation	Off-Highway Trucks	Diesel	Tier 4 Final	2.00	8.00	376	0.38
Phase 1 - Site Finishing	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	84.0	0.37
Phase 1 - Site Finishing	Skid Steer Loaders	Diesel	Tier 4 Final	1.00	8.00	71.0	0.37
Phase 1 - Site Finishing	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50
Phase 2 - Site Finishing	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	84.0	0.37
Phase 2 - Site Finishing	Skid Steer Loaders	Diesel	Tier 4 Final	1.00	8.00	71.0	0.37
Phase 2 - Site Finishing	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	84.0	0.37
Grading	Scrapers	Diesel	Tier 4 Final	6.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Grading	Off-Highway Trucks	Diesel	Tier 4 Final	3.00	8.00	376	0.38
Grading	Other Construction Equipment	Diesel	Tier 4 Final	2.00	8.00	82.0	0.42
Off-site Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Off-site Grading	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Off-site Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	8.00	84.0	0.37

Note: Screenshot does not include all the applicable changes.

4

As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.[5] According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is:

> "Off-road equipment detail as provided by Project applicant" (Appendix A.1, pp. 244).

Furthermore, the RDEIR states:

> "The following additional non-default CalEEMod model assumptions were utilized, based on information provided by the Project applicant: [...]
>
> - Off-road construction equipment to utilize "Tier IV" diesel engines, for equipment with a horsepower greater than 50 horsepower..." (p. 3.3-27).

However, the assumption that the Project's off-road construction equipment fleet would meet Tier 4 emissions standards remains unsupported for two reasons. First, the RDEIR fails to explicitly require these standards through a formal mitigation measure. According to the Association of Environmental Professionals ("AEP") *CEQA Portal Topic Paper* on mitigation measures: I-17 cont'd

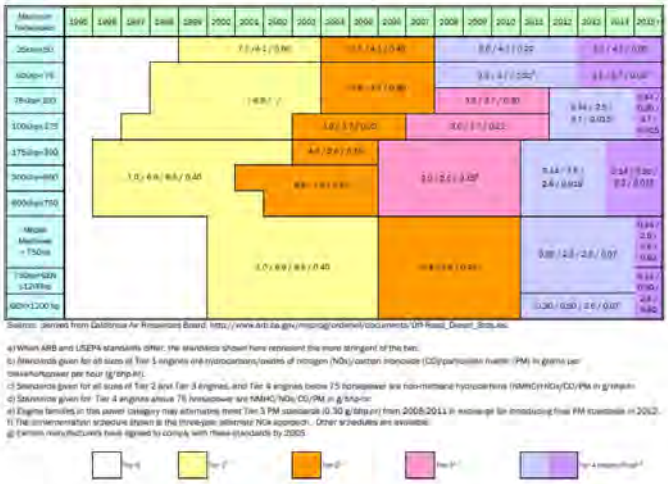
> "While not 'mitigation', a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact" (emphasis added).[6]

As demonstrated in the excerpt above, measures that are not formally included in the mitigation monitoring and reporting program ("MMRP") may be eliminated from the Project's design altogether. As the use of construction equipment with Tier 4 emissions standards is not formally included as a mitigation measure, we cannot guarantee that it would be implemented, monitored, and enforced on the Project site. Consequently, the model's assumption that the off-road construction equipment fleet would adhere to Tier 4 emissions standards is incorrect.

Second, the inclusion of Tier 4 ***Final*** emissions standards remains unsupported. As demonstrated above, the DEIR fails to specify that the more efficient Tier 4 Final emission standards would be utilized. The United States Environmental Protection Agency ("U.S. EPA") has slowly adopted more stringent standards to lower the emissions from off-road construction equipment. Since 1994, Tier 1, Tier 2, Tier 3, Tier 4 Interim, and Tier 4 Final construction equipment have been phased in over time. Tier 4 Final

[5] "CalEEMod User's Guide Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.
[6] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.

represents the cleanest burning equipment and therefore has the lowest emissions compared to other tiers, including Tier 4 Interim equipment (see excerpt below):[7]



As demonstrated in the figure above, Tier 4 Interim equipment has higher emission levels than Tier 4 Final equipment. By modeling construction emissions assuming a full Tier 4 Final equipment fleet, the RDEIR fails to account for higher emissions that may occur as a result of the use of Tier 4 Interim equipment. Since the RDEIR fails to specify whether the Project would use Tier 4 Interim or Tier 4 Final equipment, it is incorrect to model emissions assuming that the more efficient Tier 4 Final equipment would be implemented. Until a revised EIR is prepared requiring Tier 4 Final engines in a formal mitigation measure, the model should not be relied upon to determine Project significance.

I-17 cont'd

Diesel Particulate Matter Emissions Inadequately Evaluated

The RDEIR conducts a health risk analysis ("HRA") evaluating impacts from exposure to diesel particulate matter ("DPM") emissions during Project construction and operation. Specifically, the RDEIR estimates that the maximum cancer risk posed to nearby, existing residential sensitive receptors as a result of Project construction and operation would be 1.66 in one million (see excerpt below) (p. 3.3-39, Table 3.3-15).

I-18

[7] "San Francisco Clean Construction Ordinance Implementation Guide for San Francisco Public Projects." August 2015, *available at:* https://www.sfdph.org/dph/files/EHSdocs/AirQuality/San_Francisco_Clean_Construction_Ordinance_2015.pdf, p. 6.

TABLE 3.3-15: SUMMARY OF MAXIMUM HEALTH RISKS

RISK METRIC	MAXIMUM RISK	SIGNIFICANCE THRESHOLD	IS THRESHOLD EXCEEDED?
OPERATIONAL			
Residential Cancer Risk (70-year exposure)	0.72 per million	20 per million	No
Workplace Cancer Risk (40-year exposure)	0.74 per million	20 per million	No
Chronic (non-cancer)	<0.01	Hazard Index ≥1	No
Acute (non-cancer)[1]	0	Hazard Index ≥1	No
CONSTRUCTION			
Residential Cancer Risk (2-year exposure)	0.94 per million	20 per million	No
Workplace Cancer Risk (2-year exposure)	0.07 per million	20 per million	No
Chronic (non-cancer)	<0.01	Hazard Index ≥1	No
Acute (non-cancer)[1]	0	Hazard Index ≥1	No
TOTAL			
Residential Cancer Risk (Aggregrate)	1.66 per million	20 per million	No
Workplace Cancer Risk (Aggregrate)	0.81 per million	20 per million	No
Chronic (non-cancer)	<0.01	Hazard Index ≥1	No
Acute (non-cancer)[1]	0	Hazard Index ≥1	No

SOURCES: AERMOD 11.2.0 (LAKES ENVIRONMENTAL SOFTWARE, 2023); AND HARP-2 AIR DISPERSION AND RISK TOOL (VERSION 22118).

I-18 cont'd

However, the RDEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for two reasons.

First, the RDEIR's HRA is incorrect, as it relies upon emissions estimates from a flawed air model. As previously discussed, upon review of the Project's CalEEMod output files, provided in the AQ & GHG Analysis as Appendix A to the RDEIR, we found that the model incorrectly accounts for the use of Tier 4 Final emissions standards for off-road construction equipment greater than 50 horsepower. Therefore, the HRA relies on an underestimated DPM concentration to calculate the health risk associated with Project construction. As a result, the RDEIR's HRA and the resulting cancer risk should not be relied upon to determine Project significance.

Second, the RDEIR fails to mention or provide the exposure assumptions for the HRA, such as the age sensitivity factors ("ASF") or fraction of time at home ("FAH") values, whatsoever. Until the RDEIR substantiates the use of correct exposure assumptions, the HRA may underestimate the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation. Furthermore, according to the *Risk Assessment Guidelines* provided by the Office of Environmental

Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, the Addendum's models should have used the following equation:[8]

A. **Equation 8.2.4 A:** $RISK_{inh\text{-}res} = DOSE_{air} \times CPF \times ASF \times ED/AT \times FAH$

7. $RISK_{inh\text{-}res}$ = Residential inhalation cancer risk
8. $DOSE_{air}$ = Daily inhalation dose (mg/kg-day)
9. CPF = Inhalation cancer potency factor ($mg/kg\text{-}day^{-1}$)
10. ASF = Age sensitivity factor for a specified age group (unitless)
11. ED = Exposure duration (in years) for a specified age group
12. AT = Averaging time for lifetime cancer risk (years)
13. FAH = Fraction of time spent at home (unitless)

I-18 cont'd

However, the RDEIR and associated documents fail to include a dose and risk equation to calculate the Project's cancer risk. As such, we cannot verify that the RDEIR's HRA is accurate, and the Project's cancer risk may be underestimated.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

In regard to the Project's greenhouse gas ("GHG") impacts, the RDEIR states:

> "The proposed Project would be consistent with relevant plans, policies, and regulations associated with GHGs, notably the most recent version of the CARB's Scoping Plan, and the SJCOG's 2022 RTP/SCS. This would ensure that the proposed Project would be consistent with, and would not impair, the State's carbon neutrality standard by year 2045 as established under AB 1279. The State is making progress toward reducing GHG emissions in key sectors such as transportation, industry, and electricity. Since the Project would be consistent with State GHG Plans, it would not impede the State's goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and of achieving carbon neutrality by 2045. The proposed Project would make a reasonable fair share contribution to the State's GHG reduction goals, by implementing a wide array of Project features that would reduce GHG emissions (see the list of Project features listed within the Project Sustainability Features discussion, above) and therefore, the proposed Project's GHG emissions would be considered to have a less than significant impact" (p. 3.7-31 – 3.7-32).

I-19

As discussed, the RDEIR claims that the "Project would make a reasonable fair share contribution to the State's GHG reduction goals, by implementing a wide array of Project features that would reduce GHG emissions." Specifically, some of the Project Sustainability Features that the RDEIR proposes to include are listed below:

[8] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-7 Equation 8.2.4.

"CONSTRUCTION

- Construction equipment would use Tier IV-compliant engines or better for off-road construction equipment greater than 50 horsepower.
- Through the use of construction worker training and/or signage, Costco would limit heavy duty construction equipment idling to no more than 2 minutes, and in no instance shall such idling exceed 5 minutes.
- Through the use of signage, vehicle speeds on unpaved roads would be limited to < 15 mph.
- Electric hookups would be provided to reduce the need for diesel generators for electric construction equipment and, should diesel generators be needed, all such diesel generators would be equipped with emission control technology verified by EPA and/or CARB to reduce PM emissions by a minimum of 85%..." (p. 2.0-4 – 2.0-7).

However, the RDEIR's above-mentioned Project Design Features ("PDFs") are inadequate, as the RDEIR should have incorporated the PDFs as formal mitigation measures. As previously stated, according to the Association of Environmental Professionals ("AEP") *CEQA Portal Topic Paper* on mitigation measures: I-19 cont'd

> "While not "mitigation", a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact."[9]

As discussed, PDFs that are not formally included as mitigation measures may be eliminated from the Project's design altogether. As the PDFs described in the RDEIR are not formally included as mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. As a result, until the PDFs are included as mitigation measures, the RDEIR's air quality analysis should not be relied upon to determine Project significance.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or I-20

[9] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at:* https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.

otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties. | I-20 cont'd

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Attachment A: Matt Hagemann CV
Attachment B: Paul Rosenfeld CV

Response to Letter I: Blum, Collins & Ho LLP

Response I-1: This comment serves as an introduction to the comment letter and requests that Golden State Environmental Justice Alliance be added to the public interest list regarding the project. The Golden State Environmental Justice Alliance has been added to the public interest list for the project.

Response I-2: The commentor correctly summarizes the proposed Project.

Response I-3: The commentor asserts that the Recirculated EIR does not include a floor plan, grading plan, elevations, or detailed site plan for the proposed project. The commentor also claims that Figure 2.0-4 does not provide detailed information such as the earthwork quantity notes, site coverage, floor area ratio, and that there is no way for the public to verify the earthwork information.

The available Project plans were included in the Draft EIR, as required by CEQA. CEQA does not require all possible Project plans to be included in an EIR. Rather, CEQA requires an analysis and disclosure of a Project's environmental impacts according to the CEQA Guidelines.

In addition, the grading plan showing earthwork quantities has been included as Appendix C of this Response to Comments document. It is noted that the air quality and greenhouse gas emissions modeling includes the earthwork information (in fact, the air quality and greenhouse gas emissions modeling assumed an estimate of net import of 70,000 cubic yards of soil, which represents a highly conservative estimate of soil import and export, since soil import and export is anticipated to be balanced on-site, thereby requiring no soil import or export). As provided and confirmed by the Project applicant, the soil import and export would be balanced on-site with 424,280 cubic yards of both cut and fill and thus no need for soil import or export.

Response I-4: See comment response to comment I-5, below, for a response to both this comment (i.e. Comment I-4) and Comment I-5.

Response I-5: The topics of "environmental justice" or "fair treatment" are not referenced in the CEQA Guidelines and are not required CEQA impact categories or thresholds of significance. Social and economic impacts that are not related to physical impacts are not considered within an environmental analysis. The RDEIR, however, does provide an analysis of environmental topics revolving around pollution (i.e. air quality pollution, water quality pollution, etc.) to inform elected officials of potential Project impacts as they deliberate on entitlement requests and their impacts on the community.

The RDEIR has evaluated each of the proposed Project's environmental impacts against the relevant significance thresholds and considered consistency with applicable plans. Moreover, the RDEIR has incorporated mitigation measures where applicable and feasible, made appropriate significance determinations, and evaluated cumulative impacts. As noted earlier in this response, CEQA does not use the terms "fair treatment"

or "environmental justice". Rather, CEQA centers on whether a project may have a significant effect on the existing physical environment, regardless of socioeconomic conditions, including income levels of the residents. For instance, air quality impacts are measured against a threshold established for the region, which is not weighted or modified up or down based on a socioeconomic condition. The threshold itself is a metric by which an analyst can make a determination of the physical environmental impact caused by a project. The thresholds are established by the Air District, whose responsibility is to maintain and/or improve ambient air quality conditions to state and federal levels for all people.

Nevertheless, CEQA does require a lead agency to consider whether a project's effects, while individually limited, are "cumulatively considerable" and therefore significant when combined with other projects. The RDEIR has appropriately analyzed the Project's cumulative impacts. See Chapter 4.0: Other CEQA Required Topics of the Recirculated Draft EIR for further detail.

Response I-6: CalEEMod was used (in part) to estimate Project energy usage; CalEEMod is the Air District's recommended model for estimating Project criteria air pollutant and greenhouse gas emissions for CEQA projects, and therefore makes logical sense to also use to estimate energy emissions.[4] It is noted that the Air District reviewed the proposed Project, and included a comment provided herein. Nowhere in its comment did the Air District suggest that a different model should be used for this analysis. There are no "approved energy compliance modeling softwares" for calculating energy consumption for the purposes of CEQA. California's Building Energy Code Compliance Software (CBECC), identified by the commentor, is not relevant to estimating energy consumption under CEQA. Rather, CBEEC software is intended to demonstrate compliance with T24 Non-Residential Building Energy Efficiency Standards and is not a required software tool for purposes of evaluating potential energy usage for CEQA.

Moreover, the latest version of CalEEMod (CalEEMod Version 2022.1), which was used (in part) to estimate Project energy usage, accounts for the California 2019 Energy Efficiency Standards, according to Appendix A of the CalEEMod guidance,[5] in contrast to the commentor's comment that CalEEMod does not comply with the California Building Energy Efficiency Standards. Moreover, since the 2019 Energy Efficiency Standards are less stringent than the latest 2022 Energy Efficiency Standards, the energy impacts associated with the proposed Project may be overestimated in comparison to their actual impacts, since at least part of the Project is anticipated to be built according to the 2022 Energy Efficiency Standards or later standards.

[4] See here: https://www.valleyair.org/transportation/ceqaanalysislevels.htm

[5] See here: http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6

Response I-7: Regardless of whether the City of Tracy and/or SJCOG are or are not listed as jurisdictions with local energy standards approved by the CA Energy Commission for either the 2019 or 2022 Energy Code, the proposed Project is required to comply with the applicable version of the Energy code, as provided within RDEIR Chapter 3.7: Greenhouse Gases, Climate Change, and Energy. Moreover, full analysis of the Project's consistency with AB 32 and SB 32 is provided within RDEIR Chapter 3.7: Greenhouse Gases, Climate Change, and Energy.

Response I-8: It should be noted that the eight 2022 RTP/SCS policies analyzed in the Recirculated Draft EIR represent core policies of the RTP/SCS; therefore, consistency with these policies would demonstrate consistency with the entirety of the 2022 RTP/SCS. An analysis of the Project's consistency with each of the implementation strategies that are under the core policies is not required. Nevertheless, in response to this comment, an analysis of the Project's consistency with the SCJOG's 2022 RTP/SCS strategies is also provided as a revision to the Recirculated Draft EIR (see below). Specifically, the following changes are made to page 3.7-29 of Section 3.3: Air Quality of the RDEIR (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.):

TABLE 3.7-5: PROJECT CONSISTENCY WITH THE SJCOG'S 2022 RTP/SCS

POLICY/STRATEGY	*PROJECT CONSISTENCY*
Policy 1: Enhance the Environment for Existing and Future Generations and Conserve Energy	No Conflict. The Project would supply 100% of project electricity from renewable resources, as provided under Mitigation Measure 3.3-2. As also described under Mitigation Measure 3.3-2, the Project applicant shall procure power from a combination of onsite solar generation and direct source renewable purchased energy. Furthermore, consistent with Mitigation Measure 3.3-4, the Project applicant would, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours~~utilize electricity provided by Pacific Gas & Electric (PG&E) which is required to meet the future year renewable portfolio performance standards~~. In addition, Project development would be required to meet the applicable requirements of the Title 24 Building Energy Efficiency Standards.
Strategy No. 1: Encourage efficient development patterns that maintain agricultural viability and natural resources.	No Conflict. While the Project is located on land that was formerly used for agricultural activities, the Project represents an efficient use of land, and is located an in area that has been planned for industrial and commercial development. Therefore, the Project provides for an efficient development pattern that does not notably disrupt agricultural viability and natural resources. To offset any potential long-term impacts to the agricultural vitality of the region, the Tracy Municipal Code (Chapter 13.28) establishes the City's Agricultural Mitigation Fee Program, which authorizes the collection of development fees to offset costs associated with the loss of productive agricultural lands converted to urban uses (including residential, commercial, industrial, or other urban uses) within the City by permanently protecting agricultural lands planned for agricultural use and by working with farmers who voluntarily wish to sell or restrict their land in exchange for fair compensation. Agricultural mitigation fees are collected by the

POLICY/STRATEGY	*PROJECT CONSISTENCY*
	City at the time that building permits are issued and may be used to conserve existing agricultural land by securing farmland conservation easements, farmland deed restrictions, or other agreements.
Strategy No. 2: Encourage preservation of natural resources.	No Conflict. The Project would not notably reduce or eliminate access to natural resources.
Strategy No. 3: Enhance the connection between land use and transportation choices through projects supporting energy and water efficiency.	No Conflict. The Project includes a wide array of sustainability features and mitigation measures (see Mitigation Measure 3.3-1 through 3.3-36 in Section 3.3: Air Quality) that would greatly support energy and water efficiency. For example, as described on page 3.3-29 of the RDEIR, the Project would install high-efficiency restroom fixtures, which conserve water by achieving a 40% decrease over U.S standards. Furthermore, gas water heaters would be direct vent and 94% efficient or greater.
Strategy No. 4: Improve air quality by reducing transportation-related emissions.	No Conflict. The Project includes a wide array of sustainability features and mitigation measures (see Mitigation Measure 3.3-1 through 3.3-36 in Section 3.3: Air Quality) that would greatly limit air quality impacts by reducing transportation-related emissions. Moreover, the Project would replace an existing warehouse, thereby partially offsetting some existing transportation-related air quality emissions. Moreover, as described under Mitigation Measure 3.3-22, the Project would take reasonable measures to restrict truck idling, thereby limiting transportation-related emissions associated with idling. Mitigation Measure 3.3-23 would also reduce idling by increasing training associated with efficient schedule and load management to minimize queuing and idling of trucks. In addition, Mitigation Measure 3.3-27 requires that trucks owned or operated by Costco that access the Project site would not include TRUs. Lastly, electric vehicle chargers would be provided within the Project site.
Policy 2: Maximize Mobility and Accessibility	No Conflict. The Project would support the use of zero-emission and low-emission vehicles, by design to facilitate conversion of truck docks to serve electric trucks. Electric charging infrastructure will be installed on the property to facilitate the conversion of the truck fleet to zero-emission electric trucks once commercially available. In addition, the Project would support EV-ready charging spaces, consistent with the requirements of the Title 24 Building Energy Efficiency Standards. In addition, although this Project is not a transportation improvement project, the Project is located in a city where regional transit improvements are planned. Moreover, the proposed Project would include many project features that improve mobility and accessibility, including providing pedestrian network improvements, providing bicycle parking, and providing rideshare information to employees.
Strategy No. 5: Optimize the public transportation system to provide efficient and convenient access for users of all income levels.	No Conflict. The proposed Project would not disrupt or hinder the public transportation system.
Strategy No. 6: Encourage infill developments and development near transit, including transit-oriented development to maximize existing transit investments.	No Conflict. The proposed Project would be a warehouse project located in an area that is not currently in use. Such projects do not lend themselves well to transit. Nevertheless, the proposed Project would not conflict with this strategy.

POLICY/STRATEGY	*PROJECT CONSISTENCY*
Strategy No. 7: Provide transportation improvements to facilitate nonmotorized travel, including incorporation of complete streets elements as appropriate.	No Conflict. The proposed Project is a warehouse project that would include development of additional features that would facilitate nonmotorized travel. For example, the Project includes bicycle parking and electric outlets for the charging of employee e-bikes and will provide lockers/showers for employees that commute via bicycle.
Strategy No. 8: Improve freight access to key economic centers.	No Conflict. The Project will centralize Costco depot operations to more efficiently supply goods to members.
Strategy No. 9: Promote safe and efficient strategies to improve the movement of goods by water, rail, and truck.	No Conflict. Although the Project is not a transportation project, it would advance this strategy by developing a warehouse that would facilitate the efficient movement of goods.
Policy 3: Increase Safety and Security	No Conflict. The Project would be developed using the latest State and local requirements relating to safety and security. Development of the Project site would include public utility infrastructure, public and private roadways, curb/gutters/sidewalks, other pedestrian facilities, private parking, street lighting, and street signage, which would enhance the safety and security of the site and its surroundings.
Strategy No. 10: Facilitate projects that reduce the number and severity of traffic incidents.	No Conflict. The Project would be developed according to applicable City and State traffic standards. Moreover, the Project is located in an area of the City that is designed for industrial and commercial projects. Therefore, the Project is anticipated to be consistent with this strategy.
Strategy No. 11: Support local and state efforts for transportation network resiliency, reliability and climate adaptation.	No Conflict. The Project includes various sustainability features and mitigation measures, such as Mitigation Measure 3.3-1 through 3.3-36, which would help to minimize the Project's impact on the transportation network and increase resiliency and sustainability; such measures include actions to advance EV vehicles and trucks.
Policy 4: Preserve the Efficiency of the Existing Transportation System	No Conflict. The Project would not interfere with the efficiency of any existing transportation system and would advance the efficiency of movement of goods to Costco members.
Strategy No. 12: Prioritize projects that make more efficient use of the existing road network.	No Conflict. The Project would make highly efficient use of the nearby road network, as the Project is located near the existing freeways, which would minimize the amount of local roads utilized to transport good to and from the Project site.
Strategy No. 13: Support the continued maintenance and preservation of the existing transportation system.	No Conflict. The Project is required to implement road improvements and to pay applicable transportation impact fees and therefore would help to maintain and preserve the existing transportation system.
Strategy No. 14: Promote electric power, alternative fuels and autonomous technologies for freight and agriculture.	No Conflict. Mitigation Measure 3.3-26 requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).
Strategy No. 15: Manage the adoption of electric vehicles and private connected and autonomous vehicles.	No Conflict. The proposed Project is not a transportation project. Nevertheless, the proposed Project would include electric vehicle charging. For example, Mitigation Measure 3.3-29 requires the Project applicant to install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls; in addition, Mitigation Measure 3.3-26 requires the Project applicant to install

POLICY/STRATEGY	*PROJECT CONSISTENCY*
	conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).
Strategy No. 16: Promote electric power, alternative fuels and autonomous technologies for public transit.	Not Applicable. The proposed Project is not a public transportation project.
Policy 5: Support Economic Vitality	No Conflict. The proposed Project would create local jobs as well as provide new shopping options for local and regional residents, thereby supporting economic vitality (by allowing for Costco to expand its available customer inventory and to efficiently supply goods to Costco members).
Strategy No. 17: Support transportation improvements that improve economic competitiveness, revitalize commercial corridors and strategic economic centers, and enhance travel and tourism opportunities.	No Conflict. The Project would provide economic development within the City of Tracy, help promote economic competitiveness in the region, and would install road improvement and pay its fair share for traffic improvements.
Strategy No. 18: Support workforce training across industries, particularly transportation-related industries.	No Conflict. The Project would include workforce training, including Mitigation Measure 3.3-23, which requires the Project applicant to train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks. In addition, Project employees would naturally gain skills within the freight movement industry.
Strategy No. 19: Encourage and/or strengthen small business, while supporting large employer recruitment.	No Conflict. The Project would not conflict with this strategy.
Strategy No. 20: Invest in high-speed internet infrastructure to support e-business and reduce commuting.	No Conflict. The Project is not an infrastructure project. Nevertheless, the Project would not conflict with this strategy. The Project supports online shopping as the Costco Direct Delivery Center serves online orders of large items.
Policy 6: Promote Interagency Coordination and Public Participation for Transportation Decision-Making and Planning Efforts	Not applicable. This is not a transportation planning or improvement project and the policy is therefore not applicable.
Strategy No. 21: Provide equitable access to transportation planning.	Not applicable. The Project is not a transportation project. Nevertheless, the Project would not conflict with this strategy.
Strategy No. 22: Engage the public early, clearly, and continuously.	No Conflict. The Project is subject to CEQA, including the preparation of an Environmental Impact Report. Early, clear, and continuous public engagement has been part of the entire CEQA process. Therefore, the Project does not conflict with this strategy.
Strategy No. 23: Use a variety of methods to engage the public, encouraging representation from diverse income and ethnic background.	No Conflict. The Project is subject to CEQA, including the preparation of an Environmental Impact Report. A variety of methods to engage the public have been utilized throughout the entire CEQA process, including public scoping meetings and commission hearings. Therefore, the Project does not conflict with this strategy.
Policy 7: Maximize ~~the~~ Cost Effectiveness	No Conflict. The proposed Project would be developed based on market demand.
Strategy No. 24: Support efforts to	No Conflict. The proposed Project would not conflict with this

POLICY/STRATEGY	*PROJECT CONSISTENCY*
streamline the development process.	strategy.
Strategy No. 25: Support the use of state and federal grants to supplemental local funding and pursue discretionary grant funding opportunities from outside the region.	No Conflict. The proposed Project is a private warehouse development that would not use grant funding. The proposed Project would not conflict with this strategy.
Strategy No. 26: Support projects that maximize cost effectiveness.	No Conflict. The proposed Project is a warehouse development that would support economic competitiveness in the region. The proposed Project would not conflict with this strategy.
Strategy. No 27: Maximize funding of existing transportation options.	No Conflict. The proposed Project is a warehouse development that would pay its fair share of transportation impact fees and provide roadway improvements. The proposed Project would not conflict with this strategy.
Policy 8: Improve the Quality of Life for Residents	No Conflict. The proposed Project would provide warehousing that would allow for additional shopping options for local and regional residents (by allowing for Costco to expand its available customer inventory and to efficiently supply goods to Costco members), thereby improving the quality of life for residents.
Strategy No. 28: Promote a broader range of housing types.	Not applicable. The Project is not a residential project and therefore this strategy is not applicable.
Strategy No. 29: Support the development of a regional trust fund dedicated to addressing housing issues.	Not applicable. The Project is not a residential project, nor does it result in housing need effects and therefore this strategy is not applicable.
Strategy No. 30: Enhance public health through active transportation projects.	Not applicable. The Project is not a transportation project and therefore this strategy is not applicable.

SOURCE: SJCOG 2022 RTP/SCS

In contrast to the commentor's claim that the modeling for the project is erroneous and/or does not include supporting evidence, the modeling was conducted for the Project correctly and with adequate supporting evidence.

Response I-9: See comment response to comment I-8, above, for a response to this comment.

Response I-10: See comment response to comment I-8, above, for a response to this comment.

Response I-11: In contrast to the commentor's claim, the Project's emissions were not underestimated; such a claim is unsubstantiated. See the responses to the SWAPE technical comments (i.e., comment responses I-14 through I-21) for further detail. Separately, see the response in Comment Response I-8, which analyzes Project consistency with each of the RTP/SCS strategies and policies . Lastly, since the Project would be consistent with the CARB's latest Scoping Plan, and since the Scoping Plan aligns with State goals, the Project would not obstruct any State goals relating to GHGs, including those goals cited by the commentor.

Response I-12: The commentor questions the adequacy of the Draft EIR's analysis of growth-inducement.

Chapter 4.0, Other CEQA-Required Topics, of the Recirculated Draft EIR adequately discusses growth-inducing impacts. See pages 4.0-26 and 4.0-27 of the Recirculated Draft EIR.

The proposed annexation area includes the proposed Project site only.

The Project would result in 150 to 250 jobs within Planning Subarea 1. The Project would not result in 1,745 employees, as stated in the comment. This amount of jobs (150 to 250) is within the forecast of 664 jobs within 30-years. As noted throughout the Recirculated Draft EIR and Draft EIR, the Project site is within the Tracy Sphere of Influence (SOI) 10-Year Planning Horizon and is immediately adjacent to the Tracy city limits to the north of the site.

It is also noted that Planning Subarea 1 is largely already developed with urban uses. For example, the area west of Mountain House Parkway and east of Interstate 580 within this Subarea is currently developed and has been developed since prior to the adoption of the City's 2019 MSR. The Project site is one of the few undeveloped parcels within Subarea 1.

The Draft EIR complies with all CEQA requirements associated with the analysis of growth-inducing impacts.

Response I-13: The commentor Golden State Environmental Justice Alliance has been added to the public interest list for the project. See Responses I-2 through I-12 (as well as additional detail in Responses I-14 through I-21) for specific responses to the concerns in the comment letter. None of the data implicate new or substantially more severe significant impacts than examined in the Draft EIR as updated through the Recirculated Draft EIR, nor do any other circumstances exist that would trigger additional public review; thus, no further revisions to the EIR requiring public review are warranted.

Response I-14: The commentor provides an introduction to their attachment.

Detailed responses to each of the individual comments in the attachment are provided in Responses I-15 through I-20, below.

Response I-15: The commentor states that the Project fails to provide complete CalEEMod files. The commentor specifically states:

> **"***Land use development projects under the California Environmental Quality Act ("CEQA") typically evaluate air quality impacts and calculate potential criteria air pollutant emissions using the California Emissions Estimator Model ("CalEEMod"). CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but CEQA requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's*

construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters are used in calculating the Project's air pollutant emissions and demonstrate which default values are changed. Justifications are provided for the selected values

According to the RDEIR, CalEEMod Version 2022.1 is relied upon to estimate Project emissions (p. 3.3-26). However, this poses a problem as the version of CalEEMod 2022.1 currently available is described as a "soft release" which fails to provide complete output files. Specifically, the "User Changes to Default Data" table no longer provides the quantitative counterparts to the changes to the default values (see excerpt below) (Appendix A.1, pp. 264-265):

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

In contrast to the commentor's claim that current CalEEMod version 2022.1 is a "soft release", this version of the software is recommended by both CAPCOA and the San Joaquin Air Pollution Control District (SJVAPCD), as it represents the latest version of CalEEMod. With regard to providing the commentor with the mode's ".JSON" model file, this is neither a requirement of CEQA nor typical. A ".JSON" file is the modeling file associated with CalEEMod, which includes the modeling data associated with the modeling of the Project in CalEEMod. Only the output files, which were included as part of the RDEIR Appendix, are appropriate to include as part of an EIR. That is, the output files are sufficient under CEQA, as they disclose the main parameters selected within the model, as well as the results of the modeling. Moreover, the parameters associated with the CalEEMod modeling were included on page 3.3-27 of Section 3.3: Air Quality of the RDEIR. Therefore, inclusion of the .JSON files are not necessary. Nevertheless, based on this comment, the ".JSON" file has been provided to the commentor, in an email on July 30, 2024.

Furthermore, based on this comment, additional disclosure of Project CalEEMod modeling parameters has been added to Section 3.3: Air Quality. Specifically, the following changes have been made to page 3.3-27 of Section 3.3: Air Quality of the RDEIR (these changes are provided in revision marks with <u>underline for new text</u> and ~~strike out for deleted text~~.):

The following additional non-default CalEEMod model assumptions were utilized, based on information provided by the Project applicant:

- Soil import of 70,000 cubic yards during the Project's Grading phase;
- Off-road construction equipment to utilize "Tier IV" diesel engines, for equipment with a horsepower greater than 50 horsepower;
- Project Specific Equipment mix was provided:
    - Site Preparation:
        - 2 Rubber Tired Dozer
        - 2 Tractors/Loaders/Backhoes
        - 2 Off-Highway Trucks (Water Truck)
    - Grading:
        - 1 Grader
        - 2 Excavators
        - 1 Tractors/Loaders/Backhoes
        - 6 Scrapers
        - 1 Rubber Tired Dozer
        - 3 Off-Highway Trucks (Water Trucks)
        - 2 Other Construction Equipment (Soil Pulverizer)
    - Off-Site Grading
        - 1 Grader
        - 3 Excavators
        - 2 Tractors/Loaders/Backhoes
        - 1 Scraper
        - 1 Rubber Tired Dozer
        - 1 Forklift
        - 2 Off-Highway Trucks (Water Truck)
        - 1 Skid Steer Loader
    - Off-Site Improvements
        - 1 Forklift
        - 6 Tractors/Loaders/Backhoes
    - Off-Site Paving
        - 2 Paver
        - 2 Paving Equipment
        - 2 Rollers
    - Phase 1 Building Construction
        - 8 Aerial Lifts
        - 6 Forklifts
        - 4 Generator Sets
        - 1 Crane
        - 1 Welder
        - 3 Tractors/Loaders/Backhoes
    - Site Finishing (Phase 1)
        - 1 Skid Steer Loader
        - 1 Tractors/Loaders/Backhoes
        - 1 Trencher
    - Paving (Phase 1):
        - 2 Pavers

        - 2 Paving Equipment
        - 2 Rollers
    - Phase 2 Building Construction
        - 8 Aerial Lifts
        - 4 Forklifts
        - 2 Generator Sets
        - 1 Crane
        - 1 Welder
        - 3 Tractors/Loaders/Backhoes
    - Site Finishing (Phase 2)
        - 1 Skid Steer Loader
        - 1 Tractor/Loader/Backhoe
        - 1 Trencher
    - Paving (Phase 2)
        - 2 Pavers
        - 2 Paving Equipment
        - 2 Rollers
- Daily on-road construction haul trucks trips as follows:
    - Grading phase: 61 haul trips
    - Phase 1 Site Finishing: 48 haul trips
    - Phase 2 Site Finishing: 73 haul trips
    - Off-site Paving: 12 haul trips
    - Off-site Improvements: 11 haul trips
    - Phase 1 Paving: 41 haul trips
    - Phase 2 Paving: 146 haul trips
- Heavy-duty operational truck trips were assumed to travel 29 miles per one-way trip, on average, consistent with San Joaquin County's travel demand model;
- The overall average trip distance during Project operation was estimated to be approximately 21.37 miles, based on a 29 mile trip length that was assumed for heavy-duty vehicles; and an approximately 17.75 trip length (conservative assumption based on largest default CalEEMod assumed trip length value) that was assumed for all other vehicles, for a weighted average trip length of approximately 21.37 miles.
- Fleet mix was adjusted to reflect Project-specific traffic information as provided by the Traffic Study. Specifically, the heavy-duty (i.e. HDD) fleet mix was adjusted from the CalEEMod default (of approximately 1.745%) to reflect an HHD fleet mix of 32.211% of all vehicle trips (consistent with the proportion of HDD trips as a proportion of overall trips, as provided by Kimley Horn). The fleet mix percentages for each of the other (i.e. non-HHD) vehicles was adjusted downward from the CalEEMod defaults, proportionally (to account for the increased proportion of HHD vehicles as a proportion of the overall fleet mix).
- The 'General Category' consumer products emissions factor was revised to reflect the CARB adjustments applied to their Consumer and Commercial Product Survey Emission

data, made after the 2008 consumer products emissions factor (the adjustment made to reflect the average adjustment factor).[6]

The following quantified Project sustainability features relevant to air quality emissions were quantitatively accounted for:

- Construction: Water Exposed Surfaces Twice Daily;
- Energy: Require Energy Efficient Appliances (commercial refrigerator).

The Project applicant committed to the following on-site solar Photovoltaic (PV):

- 3 MW (note: this would translate into an approximate reduction of 4,936,921 kWh per year of on-site solar generation).[7]

Response I-16: This statement serves as an introduction to the comment that is provided under Comment I-17. See the comment response to Comment I-17, below.

Response I-17: Consistent with the recommendation provided by the commentor in this comment letter, a mitigation measure has been added to ensure that the Project's off-road construction equipment fleet would meet Tier 4 final emissions standards. Specifically, Mitigation Measure 3.3-30, which has been added to the Response to Comments document, would require the project applicant to ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines. This additional mitigation measure is fully consistent with the commentor's request.

Response I-18: The commentor's claim that the RDEIR's evaluation of the Project's potential health risk impacts underestimates risk is incorrect. First, as stated in previous comment responses, the air modeling is not flawed. For example, in response to the commentor's claim, the model correctly accounts for the use of Tier 4 final emissions standards for off-road construction equipment greater than 50 horsepower. This is consistent with Mitigation Measure 3.3-30, as described under the response to Comment I-17, which has been added to the Response to Comments document. Mitigation Measure 3.3-30 requires the Project applicant to ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines.

Second, the use of additional exposure assumptions, such as age sensitivity factors, is inappropriate, as such age sensitivity factors are already accounted for by within the California Air Resource Board's Hot Spots Analysis & Reporting Program (HARP2) model used for modeling the Project's health risks. That is, the HARP2 model itself already internally calculates age sensitivity factors, based on the parameters selected within the

[6] See for further detail: https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-emissions-inventory-and-temporal 0.0000107

[7] Annual energy generation for a 3 MW system was calculated based on PVWatts tool using the system size and Project location. Available here: https://pvwatts.nrel.gov/. Accessed: January 2024.

model. These parameters were selected in accordance with SJVAPCD guidance. For example, residential cancer risk in HARP2 was evaluated for an individual over a 70 year lifespan, starting in the third trimester. Additionally, workplace cancer risk in HARP 2 was evaluated for an individual over 40 years, starting at age 16. This approach is in alignment with the California Office of Environmental Health and Hazard Assessment (OEHHA) guidelines[8], as cited by the commentor in this comment. This document is the appropriate guidance manual for assessing air toxics health risks in California (and also consistent with SJVAPCD guidance). Ultimately, the equation provided by the commentor is already 'baked into' the model utilized to calculate Project health risks, that is, the appropriate calculations were correctly calculated internally within the HRA computer model itself (i.e., HARP2); to do so separately with an additional calculation, outside of the model, would be mathematically duplicative and therefore mathematically incorrect. Therefore, the commentor's claims are not relevant or correct.

Response I-19: Based on this comment and the applicant's commitments, a wide array of mitigation measures has been added to pages 3.3-31 through 3.3-34 of the RDEIR. Specifically, 35 new mitigation measures have been added. These mitigation measures incorporate the vast majority of the Project sustainability features as mitigation measures. See Chapter 3.0 of this Response to Comments for further detail. Particularly in light of the fact that the Project features relied upon within the GHG analysis have been transformed into formal mitigation measures, the implementation of such measures is appropriately assumed within the GHG analysis.

Response I-20: The commentor provides a closing disclaimer. No response to this comment is needed.

Response I-21: The commentor provides their resumes. For reference, resumes of the De Novo Planning Group team who prepared the RDEIR are provided below.

Steve McMurtry is a Principal with De Novo Planning Group and is responsible for project management, preparation of environmental documents, land use plans, air quality modeling, biological assessments, LESA modeling, regulatory permitting, litigation support, and expert witness testimony. He has successfully led multidisciplinary teams to complete hundreds of environmental, land use planning, and development projects in 32 California counties. Mr. McMurtry's experience includes service in engineering and planning firms, as well as in the building industry. He has served as the project manager for thirteen RTP EIRs in California and is known as an expert in transportation environmental planning. His environmental experience encompasses public outreach/facilitation, policy/program development, document writing/processing, and permitting. Mr. McMurtry has extensive experience preparing environmental documents and obtaining regulatory permits for state and federally funded projects, including projects within the State Highway System. Because of his expertise, he has been called on for litigation support and expert witness testimony relative to environmental and CEQA issues.

[8] See: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

Elise Laws is a Senior Planner with De Novo. She has over 10 years of environmental consulting experience completing both CEQA and NEPA documentation in the public and private sectors, as well as collaborating on long-rang planning documents. Elise has worked on a variety of projects throughout California, including large-scale, controversial development projects, Specific and Master Plans, and General Plan Updates. Examples include the West Davis Active Adult Community EIR (City of Davis), Eastview Specific Plan and Annexation EIR (City of Galt), College Park EIR (City of Rocklin), Sebastopol Zoning Code Update (City of Sebastopol), and City of Campbell General Plan Update. Her other skills include air quality modeling using the California Emissions Estimator Model (CalEEMod), California Natural Diversity Database and RareFind research, public outreach and facilitation, and project organization and management.

Josh Smith, AICP, is a Senior Planner with De Novo. He has twelve years of experience and is responsible for the preparation of CEQA/NEPA documents (Initial Studies, Negative Declaration, Environmental Impact Reports, and Environmental Assessments), the development of air quality and greenhouse gas technical plans and reports, and climate change planning for local governments. Josh has extensive experience with air quality, greenhouse gas, and energy modeling, including criteria air pollutant and air dispersion modeling. Josh also has substantial experience developing Climate Action Plans, Energy Action Plans, and toxic air contaminant (TAC) Health Risk Assessments. He served as the primary technical analyst on the Pleasanton, Oakdale, and Hughson Climate Action Plans, and has managed EIRs such as the Manteca Annexation #1 EIR, Placer County RTP EIR, and Amador County RTP EIR. Josh has additional expertise utilizing best-practice standards for developing greenhouse gas (GHG) inventories and context-specific GHG mitigation measures, as well as developing custom air pollutant emissions calculators for complex projects.

Jose Antonio Lopez, Jr.
Sr. Land Representative, Land Department

January 8, 2024

Via E-mail

City of Tracy Development Services – Planning Division
c/o Genevieve Federighi
333 Civic Center Plaza
Tracy, CA 95376
Genevieve.fedrighi@cityoftracy.org

Re: Notice Of Availability (Costco RDEIR)
CPL File Number: 2023-076

Dear Ms. Federighi,

Chevron Pipe Line Company has reviewed your correspondence regarding the proposed project named **Notice Of Availability (Costco RDEIR)**. The project proposes the construction and subsequent operation of two warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a Direct Distribution Center (DDC). The two buildings (approximately 543,526 sf for Building 1 and 1,193,198 sf for Building 2) total approximately 1,736,724 sf on the Project site. The smaller Building 1 is anticipated to serve as the annex by providing additional storage for high-turnover merchandise processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a DDC, an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery through Market Delivery Operations (MDO) located in various smaller cities in the Northern California region. DDC warehouses distribute ordered goods to the MDOs for delivery (by appointment) to the members. Cold storage would not be provided as part of the proposed Project. The Project also would include the required circulation, parking, and utility improvements. J-1

Cursory reviews of available records indicate that there are no Chevron Pipe Line Company-owned/operated facilities within the area in question.

Please remember to notify Underground Service Alert at (800) 227-2600, at least two working days before starting any excavation.

If you have any questions or need any additional information, please contact me at (925) 753-2002. When inquiring, please refer to the above-referenced file number 2023-076.

Regards,

Jose Antonio Lopez, Jr

Jose Antonio Lopez, Jr. (Tony)
Sr. Land Representative
Chevron Pipe Line Company
Office - (925) 753-2002
E-mail – tonylopez@chevron.com

Chevron Pipe Line Company
2360 Buchanan Rd, Pittsburg, CA 94565
Tel 925-753-2002
tonylopez@chevron.com

Response to Letter J: Chevron

Response J-1: The commentor correctly summarizes the proposed Project description and reports that a review of available records indicates that there are no Chevron Pipe Line Company facilities within the area. The commentor further requests that the Underground Service Alert be notified at least two working days before starting any excavation.

The Underground Service Alert would be notified at least two working days before starting excavation.

ENVIRONMENTAL SUSTAINABILITY COMMISSION

Nicholas Sese, Chair — James Damasco, Vice-Chair

COMMISSIONERS

Antonio Acosta, Navjot Kahlon, Leah Shoaito, Anthony Wahhab, Jenny Wood

Planning Division
City of Tracy
333 Civic Center Drive
Tracy, CA 95376

February 5, 2024

RE: PUBLIC COMMENT FOR THE RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (RDEIR) FOR THE TRACY COSTCO DEPOT ANNEX PROJECT SCH#2020080531

With the purpose of advising the Council on the issues related to the sustainability, environment stewardship, and opportunities for advancement on those fronts; and acting as an advocate for protecting, preserving, and enhancing the environment as it relates to issues under consideration by the City Council and Planning Commission, the City of Tracy Environmental Sustainability Commission appreciates the opportunity to give recommendations (R), comments (C), and ask clarifying questions (Q) regarding the RDEIR. After thoughtful research and discussion, the Commission have the following questions, comments, and recommendations, to be submitted to Genevieve Federighi, Associate Planner, Planning Division, and look forward to responses to these items in the Final Draft EIR. K-1

Draft EIR Page 22: (Key Findings

- Net Increase of a Criteria Pollutant (Impact 3.3-1) and Cumulative Net Increase (Impact 3.3-2).
  Q. What specific criteria pollutant is expected to increase, and what are the potential health and environmental impacts associated with this increase?
  R. The Project should address and mitigate the net increase in criteria pollutants and their cumulative effects on air quality. K-2

- Cumulative Impact on Agricultural Resources (Impact 4.4)
  Q. How does the cumulative impact affect the long-term viability of agricultural resources in the region?
  Q. Will there be runoff associated with this project?
  Q. Will there be impacts to the water sources nearby?
  R. The Project implement strategies to offset or mitigate the cumulative impact on agricultural resources and water sources. K-3

- Tree Canopy and Noise Reductions
  Q. Are the tree canopy requirements referred to in the Costco Letter equivalent to the Urban Forest Management Plan (UFMP)?
  Q. Where are the neighborhoods that are impacted by noise and how will this measure resolve those impacts. K-4

Think Inside the Triangle™

R. Make sure that tree canopy requirements are consistent with the Urban Forest Management Plan (UFMP)
R. The tree layering should form a landscaping barrier that addresses noise and the overall tree canopy. K-4 cont'd

- Landscaping
  R. All landscaping should be native plants that are non-invasive for Tracy, CA.

- LED Lighting
  Q. Will the proposed energy efficiency lighting installed be LED? K-5

- Organic Waste Reduction SB1383
  Q. What measures specifically will be taken for compliance with organic waste reduction?
  Q. Will there be a food waste bin for composting?
  R. Compliance with SB1383 for businesses K-6

- Electric Vehicle and Bicycle
  Q. Will there be Electric Bicycle storage and charging onsite?
  R. Provide charging stations for electric bicycles.
  Q. How many and locations of electric bicycle parking?
  R. Provide traffic calming mitigation that includes bicycle safety and encourages the use of bicycle travel offsite.
  R. Provide storage facilities for electric bicycles close to entrance of facility. K-7

- Onsite Food – Remaining onsite during mealtime
  Q. Will there be nutritional considerations for food in vending machines as well as by vendors onsite?
  Q. Will there be alternative sources of food which would encourage employees to not travel during mealtimes?
  Q. Will there be both indoor and outdoor seating?
  R. Provide additional options for food choices including outside vendors (food trucks) and provide outdoor seating. K-8

- Electric Vehicle Charging Stations
  Q. Why are they only located near ADA and Van Pool parking?
  Q. Is there consideration to add additional EV Chargers in the future?
  R. Give electric vehicles privileged parking and provide charging stations near the entrance. K-9

- Costco Letter #41-47, 51,54-55
  Q. Are there existing City ordinances or policies in place that provide standards for items regulated by the SJVAPCD?
  Q. Could staff provide a side-by-side comparison of City Ordinances and SJVAPCD regulations and policies?
  R. Provide language that requires compliance at a higher standard with Air Quality Standards by either the City ordinance or SJVAPCD, whichever is the stricter or higher and most current. K-10

- Construction – prior to and during

Q. Do you provide a landscaping example plan prior to permits being issued for construction?
Q. Is it possible to include exhibits showcasing this in the RDEIR?
Q. Dust control by higher standards of either City Ordinance or SJVSPCD?
Q. Do you revegetate the soil after construction?
Q. Do you comply with SWPPP requirements?
R. Compliance with SWPPP requirements.

K-11 cont'd

- Rule 9510
  C. Please provide a summary of Rule 9510.
  R. Costco should comply with the most current emission standards.

K-12

- Overall compliance
  Q. How will the mitigation strategies and project features be monitored to ensure compliance?

K-13

- Section 3.3 "Air Quality
  C. The RDEIR states that the NOx emissions will exceed the SJVSPCD Rule 9510 by more than fifty percent (50%) in its Operational Project Generated Emissions. Mitigation measure 3.3-1 stipulates the use of trucks that have a 2010 model year or newer engines that meet the CARBs 2010 engine emission standards.
  Q. When would the City begin to enforce this new measure for compliance?
  R. Given that there is a new CARB standard, the Low NOx Heavy Duty Omnibus Regulation, released in August 2020 and in effect 2024, it is strongly recommended that Costco be held to this new higher standard.

K-14

- GHG Reductions
  Q. What are Costco's plans to continue to reduce GHG emissions at this site post2020, per CARBs Strategies in the sectors of energy, transportation, water and wastewater management?
  R. Strongly recommended that Costco implement the suggestions that are included on page 112 of the RDEIR.

K-15

- Agricultural Mitigation Measures
  Q. Regarding the loss of "Prime Farmland' as a result of this project, the RDEIR mentions the City's Agricultural Mitigation Fee program and the SJMSCP required ag per-acre fees. How much is Costco paying to the City and to the SJMSCP?
  Q. How, specifically, will the City use the fees that are collected?
  Q. What specific conservation easements on Ag Land will be purchased and what will be done on those lands?

K-16

- Impact 4.14 – Cumulative Noise
  Q. What is being done to reduce the number of trucks at night and the noise that is generated by them both traveling and idling?
  R. It is strongly recommended that Costco build a noise barrier/sound wall and implement other practices to reduce nighttime noise to surrounding residences.

K-17

- Impact 4.17 – Vehicle Miles Traveled
  Q. Why is it so difficult to measure the effect of travel demand management?

K-18

R. Strongly recommended that Costco implement further strategies as outlined in Kimley/Horne study report beginning on page 644 of the RDEIR and include items a through g of that report which are:
a. Coordinating with the City transit agency to put in a transit stop and provide a bus route to this are, which already has other industrial hubs
b. Provide transit subsidies to use this local transit
c. Implement a Travel Behavior Change program to educate and incentivize employees to change their travel behaviors
d. Use promotions and marketing to promote awareness of the TDM strategies and have an on-site coordinator to monitor the Travel Behavior Change program
e. Implement an Emergency Ride Home program for employees using alternative transportation who need a ride home at times that transportation is not provided
f. Offer telecommuting and alternative work schedules where possible, such as a Four-Ten work schedule that results in 20% weekly VMT reduction, 10% trip reduction and 15% VMT reduction
g. On-site childcare to remove the need to drive a child to daycare at a separate location

K-18 cont'd

- Parking Requirements
  Q. Page 705 of the RDEIR is a diagram of the parking proposed at the Project. Given that the estimated number of employees is 250 and that the mitigation strategies include reducing the number of parking spaces to the minimum, why are there 611 parking slots?
  Q. If this is due to the City minimum, what is that number?
  Q. What studies were performed to determine the actual mitigation of limited parking?
  Q. Does the study show that the mitigation actually provides less miles traveled?
  R. It is strongly recommended that Costco reduce the number of parking spots for employees and one guest.

K-19

- Ride Share Program
  Q. How will Costco implement this?
  R. Work with City to make this a bus stop. Provide Tracer credit. Provide shuttle service with electric bus.
  R. Costco provide its own shuttle service with electric vehicle.

K-20

- Solar PV
  Q. What study(s) were done on the carbon impacts for the addition of solar?
  Q. How much of the roof space is being utilized and what is the portion of their energy that will be mitigated by solar installation and collection?

K-21

- Mobile TDM – Costco Mitigations
  Q. #15 and #16, are these measures for offsite or onsite?
  Q. #21-23, how will this become a mitigation measure? How will it be implemented and enforced to resolve the impact?
  Q. #24 and 26, how will this be enforced onsite? How will this become a mitigation measure and how will you show it resolved the impact?
  Q. #32 Truck Idling - What studies were conducted that show this mitigation will result in measurable reductions in noise? How will it be enforced?
  Q. #36 how will this be implemented and how will it be enforced? Who has oversight to ensure compliance?

K-22

Q. #40 - Construction of idling of vehicles: how will this become a mitigation measure? Who monitors this during construction?
Q. #50 - Speed: how will this become a mitigation measure? Who monitors this to show this mitigation is met? Is this onsite or offsite?
Q. #53 – Noise mitigation during construction. Need to consider safety over noise reduction for backup truck sounds. How will this mitigation measure be implemented and who will enforce it?
Q. #28 what is the mitigation measure to facilitate this change. How do they see implementation?
R. Use Hydrogen power trucks with fuel from hydrogen power plant in Tracy.

K-22 cont'd

It is our hope that the City of Tracy and Costco work together to ensure that construction and operation of this Project protect, preserve, and enhance the environment. It is important to this Commission, the City, and its residents that all of the impacts in this RDEIR considered "significant" should be mitigated to a point where they are "less than significant" and thus not as severe an impact on the environment or the health and well-being of our City's residents and wildlife. The Commission is of the belief that with further effort on the part of Costco, this is able to happen and will better ensure the protection of our local environment overall.

Thank you again for this opportunity to make these comments, ask questions, and provide recommendations.

K-23

The Environmental Sustainability Commission

Response to Letter K: City of Tracy Environmental Sustainability Commission

Response K-1: The comment serves as an introduction to the more detailed recommendations, comments, and questions discussed in Comments K-2 through K-22 and addressed/responded to below in Responses K-2 through K-22.

Response K-2: The commentor asks what specific criteria pollutant is expected to increase, and what are the potential health and environmental impacts associated with this increase.

As provided on page 3.3-35 of the RDEIR, Project operational NOx emissions are anticipated to be above the applicable SJVAPCD 10 tons per year threshold and the health and environmental impacts are discussed fully in the RDEIR. The Project includes a wide variety of sustainability features, mitigation measures, and regulatory requirements that would minimize the Project's criteria pollutant emissions. Specifically, 35 new mitigation measures have been added and are discussed on pages 3.3-31 through 3.3-34 of the RDEIR. These mitigation measures incorporate the Project sustainability features as mitigation measures. See Chapter 3.0 of this Response to Comments for further detail. While these additional mitigation measures are expected to substantially reduce the Project's emissions, the RDEIR conservatively assumes that operational NOx emissions will remain above the applicable SJVAPCD 10 tons per year threshold after mitigation, primarily due to the difficulty of quantifying the emissions reductions that would result from the Project's sustainability features, mitigation measures, and regulatory requirements.

Response K-3: Impacts associated with cumulative agricultural resources are discussed on pages 4.0-5 and 4.0-6 of Chapter 4.0 of the Recirculated Draft EIR. As discussed, development of the proposed Project would result in a permanent conversion of 101.78 acres of Prime Farmland to non-agricultural use. The loss of Important Farmland as classified under the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) is considered a potentially significant environmental impact.

The proposed conversion of the Project site from agricultural to industrial uses is consistent with the City's overall planning vision, as the Tracy General Plan acknowledges that the Project site is within the City's Sphere of Influence (10-year Horizon) and designates the Project site as Industrial with the understanding that the site would be developed for such uses. The City's General Plan EIR anticipated development of the Project site as part of the overall evaluation of the build out of the City. To offset any potential long-term impacts to the agricultural vitality of the region, the Tracy Municipal Code (Chapter 13.28) establishes the City's Agricultural Mitigation Fee Program, which authorizes the collection of development fees to offset costs associated with the loss of productive agricultural lands converted to urban uses (including residential, commercial, industrial, or other urban uses) within the City by permanently protecting agricultural lands planned for agricultural use and by working with farmers who voluntarily wish to sell or restrict their land in exchange for fair compensation. Agricultural mitigation fees are collected by the City at the time that building permits are issued and may be used to

conserve existing agricultural land by securing farmland conservation easements, farmland deed restrictions, or other agreements. Though the Project site is not in active agricultural operation and has not been for some time, Costco would still be responsible for payment of these fees to remain compliant with the code and also to provide support for the agricultural vitality of the broader region.

Separately, the Project is considered a Hydromodification Management Project because it would result in the development of one acre or more of impervious surface. Hydromodification Management Projects are required to prepare and submit a Project Stormwater Quality Control Plan for review and approval by the City that demonstrates the Project incorporates best management practices (BMPs) and site design measures, landscape features, and engineered treatment facilities (typically bioretention facilities) that will achieve the following:

- Minimize impervious surface area
- Retain or detain stormwater
- Slow runoff rates
- Reduce pollutants in post-development runoff

The requirement for this plan is documented in and ensured by Mitigation Measure 3.9-2. Mitigation Measure 3.9-1 requires the Project to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) to reduce erosion and sedimentation pursuant to BMPs to be approved by the City and the Regional Water Quality Control Board. Implementation of Mitigation Measures 3.9-1 and 3.9-2 would ensure the Project is consistent with regulatory requirements, which would ensure that the proposed Project would have a less than significant impact on development-related water quality. Thus, there will be no impacts to water sources nearby.

Response K-4: The Project would provide tree planting in the employee vehicle parking areas and at the perimeter of the site. This will contribute to the Urban Forest Management Plan (UFMP) city-wide goal of achieving 15% canopy cover by 2040.

Layering of tree planting along West Schulte Road would form a landscape barrier and contribute to the overall tree canopy coverage requirement identified in the UFMP. Layer one would include street trees planted adjacent to the West Schulte Road. Layer two would provide tree planting where there are no solar structures within the vehicle parking areas and along the perimeter of the site. The tree planting in the vehicle parking area will still achieve a 50% shading of the pavement area as required by CalGreen. Finally, layer three would include tree planting adjacent to the building to assist in softening the mass of the warehouse building.

There are no residential “neighborhoods” in the immediate area of the Project site; therefore, neighborhood noise impacts would not be a concern. However, there are three existing rural/farm residences located on the adjacent parcel to the west. An additional existing rural/farm residence is located farther away from the Project site to the

southeast. As discussed in chapter 3.11 of the RDEIR and depicted in Figures 3.11-1, 3.11-2, 3.11-3 and 3.11-4 within that chapter, operational noise from the Project would not result in any impacts to the residence to the southeast, and while there would be occasional impacts from operational noise to the closest of the three residences to the west, implementation of Mitigation Measure 3.11-2 requires a minimum 6-foot tall sound wall and/or landscaped berm will help reduce those impacts. Perhaps more importantly, however, the owner of the adjacent parcel to the west containing those three rural/farm residences submitted an application to the City of Tracy (A/P21-0001 D21-0020) seeking approvals to construct a 214,400 square feet industrial warehouse. If that project is approved, those existing rural/farm residences and outbuildings would be removed. The RDEIR acknowledges this and notes that should those residences be vacated, demolished, and rezoned to industrial use, Mitigation Measure 3.11-2 and the sound wall/landscaped berm specified therein would not be required.

Plant material specified for the Project would consist of 20% California natives and 80% non-invasive Mediterranean plant species suitably adapted to both local and regional climate conditions for the City of Tracy. These plant types would enhance the overall Project aesthetic while also creating a sustainable, low maintenance, and reduced water demand landscape.

Response K-5: The proposed energy efficient lighting will be LED. As discussed in Chapter 2.0, Project Description, of the Recirculated Draft EIR, the employee parking lot and truck and trailer parking areas would be illuminated with standard downward pointing lights, each containing two LED fixtures affixed to a 38-foot foot light pole. The lighting fixtures would be of a "shoe-box" style. Parking lot light standards would be designed to provide even light distribution for vehicle and pedestrian safety as well as site and building security without causing light to spill onto adjacent properties. LED Lighting fixtures also would be located approximately every 40 feet around the exterior of the warehouse buildings to provide additional lighting for safety and security.

Additionally, impacts related to lighting are discussed on pages 3.1-11 and 3.1-12 of the RDEIR. Impacts were determined to be less than significant and no mitigation is warranted. The Project would be subject to the City's existing lighting requirements. As discussed, the City of Tracy Standard Plan #140 establishes street light standards, and requirements for light illumination to assist in reducing light impacts. Additionally, City of Tracy Standard Plan #154 establishes standards for lighting parking areas, requiring that illuminated parking facilities provide a minimum 1-foot candle. Further, Section 10.08.400 of the Municipal Code specifies that the site plan and architectural review package includes an exterior lighting standards and devices review.

Response K-6: As discussed in Chapter 2.0, Project Description, building organic waste (i.e., plastics, green waste, wood waste, food waste and fibers such as paper and cardboard) would be recycled to the maximum extent possible and in full compliance with Senate Bill 1383. Costco will continue its existing local robust efforts to recycle all cardboard, wood pallets,

and plastic. Further, Costco will comply with State mandates concerning organic waste reduction as enacted through SB 1383.

Response K-7: As noted on page 2.0-6 of Chapter 2.0 of the Recirculated Draft EIR, bicycle parking would be provided in the employee parking lot and at the front entry of each building. Further, Costco has committed to providing secure bicycle parking/storage either indoors or in a covered area outdoors, making e-bike charging facilities available for employees as needed and providing locker/shower facilities for employees who commute via bicycle. And Mitigation Measure 3.3-18 requires that electrical outlets be provided for the charging of employee e-bikes. Finally, Costco's site plan separates truck circulation from circulation for employee vehicles and bicycles such that no further traffic calming measures are needed.

Response K-8: These questions and recommendations do not directly address the adequacy of the RDEIR or any CEQA-related topics. Nevertheless, as noted in Chapter 2.0, Project Description, on-site meal options would be provided for employees (e.g., micro market vending machines that offer drink and food for sale to employees, or food trucks [as regulated by Section 10.08.3193 – Mobile Food Vendors of the City's Municipal Code]) to minimize off-site employee trips during shifts. Indeed, Costco has committed to providing food and drink service for sale onsite to provide meal options to operations employees. Food options available will include fresh fruits and vegetables. Seating would also be provided for employee enjoyment of meals both indoors and outdoors. In addition, during construction, the contractor would work with food vendors to provide on-site meal options to construction personnel.

Response K-9: As noted in Chapter 2.0, Project Description, of the RDEIR, Costco would install EV capable (i.e., pre-wired) parking spaces as well as parking stalls with active EV charging stations per the California Building Code. EV-designated stalls in an amount required by the applicable building code will include all the electrical infrastructure necessary to support the future installation of charging stations, and the project will immediately activate such EV charging stations as required by the building code. The proposed EV charging stations are located near the ADA and carpool parking spaces because those spaces are in preferred, convenient locations nearest to building entrances to incentivize EVs and assist those with disabilities. Costco intends to install conduit at the outset that will allow it to expand the number of active EV charging stations over time as employee demand for such spaces increases.

Response K-10: The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the regional governmental entity formed and empowered to implement air quality management strategies to protect public health. SJVAPCD prepares and implements an air quality plan and adopts and enforces regulations to evaluate and minimize pollutant emissions. It is our understanding that the City of Tracy relies on the SJVAPCD to fulfill its mission, and the City has not enacted different or more stringent air quality standards or requirements. In any event, Costco will adhere to all applicable laws and regulations. Thus, to the extent

that any City ordinance imposed more restrictive air quality standards or requirements, Costco would follow such applicable local laws.

Response K-11: As part of its application for Project approval, Costco has submitted a landscaping plan to the City. It will be considered by the Planning Commission and City Council as part of the entitlement package. As part of the Project construction process, Costco would revegetate the soil and install landscaping consistent with the approved landscape plan. Also during construction, as required by Mitigation Measures 3.9-1, Costco would adhere to all applicable dust control requirements and comply with all stormwater requirements, including requirements pertaining to SWPPPs.

Response K-12: Costco will comply with applicable emission rules. Rule 9510, enacted by SJVAPCD, is SJVAPCD's Indirect Source Program, which is designed to encourage developers to incorporate project measures to address air quality impacts and reduce emissions of NOx and PM10 from new development. As part of Rule 9510, a development project must reduce construction NOx and PM10 emissions by 20% and 45%, respectively, as well as reduce operational NOx and PM10 emissions by 33.3% and 50%, respectively, compared to baseline emissions. Emission reduction requirements can be satisfied through a combination of project design elements and/or off-site fees paid directly to the District to fund off-site emission reduction projects. Costco will comply with all requirements of Rule 9510.

Additionally, new mitigation measures relating to air quality have been added, and are designed to reduce emissions (including emissions of NOx and PM10). Examples of such new mitigation measures are provided below.

- ***Mitigation Measure 3.3-6****: The Project applicant shall ensure that diesel generators shall not be used on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.*
- ***Mitigation Measure 3.3-7****: The Project applicant shall ensure that, during Project operation, for trucks owned or operated by Costco that access the site, only ultra-low sulfur diesel fuel or biodiesel blended with sulfur content of 15 ppm or less shall be used, so long as such fuel is commercially available.*
- ***Mitigation Measure 3.3-14****: The Project applicant shall devise and implement a property maintenance plan during Project operation that includes sweeping parking lots regularly to remove road dust, tire wear, brake dust, and other contaminants.*
- ***Mitigation Measure 3.3-22****: The Project applicant shall take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site shall be required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.*

- ***Mitigation Measure 3.3-23****: The Project applicant shall train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.*
- ***Mitigation Measure 3.3-25****: The Project applicant shall ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) shall be electric or zero-emission vehicles. The Project applicant shall provide on-site electrical charging facilities to adequately service such electric vehicles.*
- ***Mitigation Measure 3.3-27****: The Project applicant shall ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs).*
- ***Mitigation Measure 3.3-30****: The Project applicant shall ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines.*
- ***Mitigation Measure 3.3-31****: The Project applicant shall provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators shall be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%.*
- ***Mitigation Measure 3.3-32****: The Project applicant shall ensure that heavy-duty diesel hauling trucks that access the Project site for construction shall be model year 2010 or newer, so long as such trucks are reasonably available.*
- ***Mitigation Measure 3.3-34****: The Project applicant shall, during construction, install signage on any unpaved primary construction accessways onsite on the project site to limit vehicle speeds to no more than 15 mph.*

Response K-13: All mitigation measures identified in the RDEIR and imposed as conditions of approval will be set forth within a mitigation monitoring and reporting program (MMRP), as required by CEQA. The City will monitor implementation of all mitigation measures pursuant to timing and responsible party details in the MMRP. With Costco's consent, the City has transformed all of Costco's sustainability commitments into formal mitigation measures that have been added to the EIR and the MMRP.

Response K-14: The Low NOx Heavy Duty Omnibus Regulation establishes engine manufacturer standards. Costco will comply with this regulation for all engines purchased subject to this regulation, as requested in the comment. More information can be found at the California Air Resources Board website.[9] .

Response K-15: As indicated on page 3.7-30 of the RDEIR, many existing initiatives and regulations will by their nature continue to reduce the Project's projected GHG emissions. These include improvements in energy efficiency and production of renewable energy (note that the Project would use 100% renewable energy); improved vehicle efficiency and low carbon

[9] See: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox

fuels; better water conservation technologies; and improvements in the waste management sector.

Also, pursuant to its Sustainability Commitment and Climate Action Plan published on its website,[10] Costco is deeply committed to sustainability, including reducing the emissions that lead to GHGs. Costco's Climate Action Plan provides that it has committed to an ambitious Scope 1 and Scope 2 emission reduction target: 39% absolute reduction by 2030 compared to its 2020 base year. Costco has also committed to power its operations with 100% clean energy by 2035. To achieve these ambitious targets, Costco is evaluating, piloting and implementing a range of initiatives in its warehouses, expanding its procurement of clean energy and enhancing its framework to measure and monitor progress toward its goals.

Response K-16: Costco will abide by the requirements of the City's Agricultural Mitigation Fee ordinance codified in Chapter 13.28 of the Municipal Code. As noted on page 3.2-10 of Section 3.2 of the Draft EIR, Tracy Municipal Code Chapter 13.28, establishes the City's Agricultural Mitigation Fee Program, which authorizes the collection of development impact fees to offset costs associated with the loss of productive agricultural lands converted for private urban uses (including residential, commercial, industrial, or other urban uses) within the City. Agricultural mitigation fees are collected by the City at the time that building permits are issued. Fees collected under Chapter 13.28 may be used for the preservation of farmland or open space within or adjacent to the Tracy planning area or its adopted sphere of influence (beyond the land deemed necessary for development), to establish an urban boundary or open space buffer zone, or within San Joaquin County. The use of the fee may include outreach, the purchase of land or easements, transaction costs, easement monitoring and enforcement of regulations on the land, and reasonable general administrative costs. Farmland conservation easements should be permanent and the fees may not be used to purchase land or easements already subject to another conservation easement. In addition, and in fulfillment of Mitigation Measure 3.4-1, Costco will provide compensation for any potential biological impacts per the terms of the San Joaquin Multi Species Conservation Plan (SJMSCP). According to the SJMSCP 2024 updated habitat fees[11], agriculture habitat types are required to pay $17,833 per acre. Using this fee amount and applying it to the 103-acre Development Area, the fees paid by the applicant would total $1,836,799. As noted on page 3.4-27 of Section 3.4 of the Draft EIR, the appropriate fees are collected by the City and remitted to SJCOG for administration. SJCOG uses the funds to preserve open space land of comparable types throughout the County, often coordinating with other private or public land trusts to purchase conservation easements or buy land outright for preservation.

[10] Costco's Sustainability Commitment can be found at https://www.costco.com/sustainability-introduction.html and Costco's Climate Action Plan is located at https://mobilecontent.costco.com/live/resource/img/23w10059/5a-ClimateActionPlan_2023.pdf.

[11] https://www.sjcog.org/DocumentCenter/View/9000/2024-Habitat-Fees

Response K-17: As analyzed in the EIR, only one nearby residential use could be adversely affected by Project operational noise, and it lies to the west of the Project site. The property occupied by the residential use is currently proposed for conversion to industrial use. If that does not occur, then in accordance with Mitigation Measure 3.11-2, Costco will construct a 6-foot tall sound wall and/or landscaped berm to minimize those noise effects.

See also Response K-4 regarding operational noise at the adjacent residence. With respect to construction noise, the following mitigation measures would reduce construction noise to the extent feasible:

> Mitigation Measure 3.3-36: The Project applicant shall employ the following strategies during construction to minimize noise:
>
> (a) Concrete delivery vehicles shall have low frequency back up beepers that meet Cal-OSHA requirements.
>
> (b) All fleet equipment shall have mufflers and noise-minimizing devices.
>
> (c) Personal radios shall not be allowed onsite.
>
> Mitigation Measure 3.11-2: To reduce potential operational noise impacts during Project operation, a minimum 6-foot tall sound wall and/or landscaped berm shall be constructed along the western Project boundary. Noise barrier walls shall be constructed of concrete masonry units, earthen berms, or any combination of these materials. Should the adjacent west residential use be vacated, demolished, and rezoned to industrial before the proposed Project is completed, a sound wall shall not be required. These requirements shall be included in the improvements plans prior to their approval by the City's Public Works Department.

Response K-18: A challenge to measuring the effectiveness of TDM measures is human behavior and human travel choice changing from day to day or year to year as household and community circumstances change. The way a person organizes their life schedule, and therefore their travel patterns, is influenced by many factors, including characteristics of their household schedule, work state, obligations in life, and viable travel mode options. A business can provide incentives for employees to make environmentally conscientious commute choices, and those incentives may seem promising. However, if the travel options cannot reasonably allow a person to fulfill their obligations in life (e.g., like dropping off children at school or daycare on the way to work), then incentives to carpool to work, take transit to work, and the like will have limited effect if the travel options do not first go by the children's school or daycare. In-kind measures such as providing on-site childcare become effective only when the scale of an employer is sufficiently large to employ enough people with families with young children to both make a childcare facility financially viable and to be developed as a professional childcare facility with child development programming and activities that are competitive with other childcare options available in the surrounding community. Moreover, household circumstances

evolve over time, making employee travel choices a dynamic feature of a project over the years of its operations.

Another challenge to measuring the effectiveness of TDM measures is the practicality of observing or measuring what people do on a recurring basis. In the case of businesses, surveys of employees can provide general insight as to people's travel choices, but frequent, on-going information gathering becomes impractical.

Since the circulation of the original Draft EIR in 2022, Costco has further considered and embraced additional TDM measures beyond those identified in the Draft EIR. The list of TDM measures Costco has embraced is reflected in changes made to Table 3.13-2 of the Draft EIR and as shown in revised Mitigation Measure 3.23-1, which has been modified to read as follows (modifications shown in underlined text):

> ***Mitigation Measure 3.13-1:*** *The Project applicant shall implement feasible Transportation Demand Management (TDM) strategies, which would decrease the VMT generated by the Project by 15 percent. Specific potential TDM strategies include, but are not limited to, the following:*
>
> - *Reduce Parking Supply*
> - *Travel Behavior Change Program*
> - *Promotions and Marketing*
> - *Emergency Ride Home (ERH) Program*
> - *Ride Share Program*
> - *Designated Parking Spaces for Car Share Vehicles*
> - *Include Bike Parking Per City Code*
> - *Include Secure Bike Parking and Showers*
> - *Bicycle Repair Station/Services*
> - *Pedestrian Network Improvements*
> - *Provide On-Site Meals*
>
> *The TDM Plan shall be submitted to the City for review prior to approval of improvement plans, and the effectiveness of the TDM Plan shall be evaluated, monitored, and revised, if determined necessary by the City. The TDM Plan shall include the TDM strategies that will be implemented during the lifetime of the proposed Project and shall outline the anticipated effectiveness of the strategies. The anticipated effectiveness of the TDM Plan may be monitored through annual surveys to determine employee travel mode split and travel distance for home-based work trips, and/or the implementation of technology to determine the amount of traffic generated by and home-based work miles traveled by employees, which shall be determined in coordination with the City. The frequency and duration of the anticipated effectiveness would depend on the ultimate strategy determined in coordination with the City. Additionally, should the initial TDM Plan submitted to the City for review be projected to fall short of achieving a 15 percent decrease in VMT, the Project applicant shall pay any VMT banking fee in effect at the time of building permit issuance to secure VMT credits of a total of 15 percent for the subject building, taking into account the stated percent efficacy for the TDM measures above. Should the initial TDM Plan submitted to the City for review be projected to fall short of achieving a 15 percent decrease in VMT and a VMT banking fee is not in effect at the time of building permit issuance,*

the Project applicant shall make a one-time contribution to the City of Tracy transit service provider, TRACER, equal to the amount that would be calculated using the City's draft VMT banking fee of $633.11 per VMT, as documented in the Transportation and Circulation section of the Draft EIR, to enable opportunity of transit services that would benefit the Tracy community in perpetuity and overcome the TDM Plan's shortfall in projected VMT reduction.

Together, these TDM measures are expected to achieve a 12% reduction in employee VMT, compared to the 2% reduction in employee VMT documented in the Draft EIR. Some of the TDM measures mentioned by the Commission are included in the revised TDM measure list while others were considered and excluded for reasons discussed here:

Transit route and bus stop. The Project would not pursue a bus route to serve the Project area. TRACER Bus Service is the fixed route transit service in Tracy. Transit providers set service routes based on factors such as ridership demand along the full route, not just at an endpoint or short segment of a route, continuous and sizable demand over the course of several hours of the day, ridership demand in other parts of the service area, and overall agency funding constraints. Given the location of the Project site and its vicinity, ridership demand in this area along W. Schulte Rd. would be low relative to other areas in the city and would not generate sufficient ridership to justify the allocation of transit agency resources to provide a transit route to the area.

Transit subsidies. The Project would not provide transit subsidies to employees. A TRACER bus route does not exist on W. Schulte Rd. nor is one expected to be provided in the vicinity of the Project site. Provision of transit subsidies would not support employees traveling to work since there would not be a bus to ride.

Travel behavior change program. Costco is committing to provide a travel behavior change program to educate employees of travel choice options and promote awareness of the impacts of their travel choices and the opportunities to alter their habits.

Emergency ride home. Costco is committing to provide an emergency ride home program for employees using alternative transportation who need a ride home at times that transportation is not provided.

Telecommuting. The Project would not provide telecommuting or four-ten work schedules due to the nature of the Depot Annex business operations. Work in the main warehouse component of the operations entails hands-on work with products and inherently cannot be performed from home or another location. Administrative staff engage directly with warehouse operations staff and participate frequently in on-site activity and therefore could not perform their duties from home or another location.

On-site childcare. The Project would not provide on-site childcare. As stated previously, providing on-site childcare becomes effective only when the scale of

an employer is sufficiently large to employ enough people with families with young children to both make a childcare facility financially viable and to be developed as a professional childcare facility with child development programming and activities that are competitive with other childcare options available in the surrounding community. Moreover, household circumstances evolve over time, and children grow and mature and develop different care needs, making a childcare program untenable for a project of this scale given the number of employees. Furthermore, the Project facilities and uses are not compatible with a daycare operation.

Response K-19: Parking is not a CEQA issue. Nonetheless, Costco has committed to including in the Project no more than the number of parking spaces needed to meet the City Code's minimum requirement of 576 spaces. No known research has demonstrated a link between providing fewer parking stalls at an industrial site in a relatively remote area and a reduction in employee VMT. Moreover, providing insufficient parking at such a facility that does not have viable alternative modes of travel, such as the Project, would lead to people driving to work and then parking somewhere else, such as along W. Schulte Rd. Therefore, providing fewer parking stalls would not influence the Project VMT.

Response K-20: Costco has committed to and pursuant to Mitigation Measure 3.3-29 will participate in the San Joaquin County Transit District "dibs" program[12] or another similar existing program that partners with employers to provide transportation options, incentives, tips, and emergency rides home and assist in connecting independent vanpool participants together.

TRACER Bus Service is the fixed route transit service in Tracy. As noted above, transit providers set service routes based on factors such as ridership demand along the full route (not just at an endpoint or short segment of a route), continuous and sizable demand over the course of several hours of the day, ridership demand in other parts of the service area, and overall agency funding constraints. Given the location of the Project site and its vicinity, ridership demand in this area along W. Schulte Rd. would be low relative to other areas in the city.

A shuttle service is viable in situations where employees have similar travel patterns that can be further supported by riding on a shuttle. Examples are employees who take a train for much of their journey to work and could benefit from riding together in a shuttle from the train station to their workplace. BART in the Bay Area and Amtrak's Capital Corridor are examples of such commuter rail services that give people similar commute routes. Costco's employees live throughout the greater Tracy area and do not have similar travel patterns or the option to take a train to work. Therefore, a shuttle service is impractical for this Project as there would not be a hub or location employees have in common to "catch the shuttle" to work, and the time needed for a shuttle to pick up workers near

[12] https://dibsmyway.com/

their homes would make the time spent on the journey to/from work burdensome to employees. However, employees could choose to form carpools or vanpools and, as outlined above, would have available to them information about how to do so.

Response K-21: The GHG emission reductions from the installation of solar were evaluated in the RDEIR using the California Emissions Estimator Model (CalEEMod). The RDEIR calculates that for every MWh of solar supplied to the site, approximately 204 lbs of CO2 would be reduced based on the utility-specific electricity greenhouse gas emission factors. One hundred percent of the Project's electricity will come from renewable sources. Costco estimates that up to 3.4 MW of its electricity needs for the Project will be supplied through a direct purchase contract with a renewable energy supplier and that the remainder of the project's electricity needs will be met by solar power generated and stored in batteries onsite by solar panels to be placed on building roofs and walls and on parking lot structures.

Response K-22: As noted above, should the City's VMT banking fee not be adopted, it is possible that some of the commentor's suggested measures would be implemented as part of the TDM program. The pedestrian network and traffic calming elements within Costco's Project commitments are planned for the Project site. The same is true for low speeds on unpaved onsite routes during construction. Costco's contractors have assured us that the concrete delivery trucks can employ low frequency back up beepers without compromising safety. As to requiring that Costco adhere to its Project commitments, as noted above, Costco has agreed and the City is imposing Costco's commitments/Project features as formal mitigation measures to be included within the EIR and the MMRP.

Costco has stated that it is committed to complying with the State's GHG emission reduction goals through the transition to an electric truck fleet. This is consistent with the State's direction of encouraging the transition to zero-emission vehicles (ZEV), as can be seen in regulations such as the Advanced Clean Fleets and Advanced Clean Trucks regulations, which aim to accelerate the market towards ZEVs, focusing on fleets that are well-suited for electrification. Due to the existing commitment towards transitioning to electric trucks, Costco is limited in its ability to incorporate other zero-emission technologies into its fleet such as hydrogen. Hydrogen-powered trucks run on entirely different engine systems with widely different maintenance requirements. Furthermore, the related fueling infrastructure is completely different from that for electric trucks. Thus, it would be infeasible for Costco to prepare for both electric and hydrogen-powered vehicles in our own fleet. Nonetheless, Costco's buildings will allow access from third party trucks that use hydrogen power.

Response K-23: This comment serves as a conclusory statement. No response to this comment is warranted.

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

WINTER KING
Attorney
king@smwlaw.com

February 5, 2024

Via E-Mail Only

Genevieve Federighi, Associate Planner
City of Tracy, Planning Division
333 Civic Center Plaza
Tracy, CA 95376
genevieve.federighi@cityoftracy.org

Victoria Lombardo, Senior Planner
City of Tracy, Planning Division
333 Civic Center Plaza
Tracy, CA 95376
victoria.lombardo@cityoftracy.org

Re: Comments on the Tracy Costco Depot Annex Recirculated Draft EIR, State Clearinghouse No. 2020080531

Dear Genevieve Federighi and Victoria Lombardo:

On behalf of the Sierra Club, Delta Sierra Group of the Mother Lode Chapter, we have reviewed the Recirculated Draft Environmental Impact Report ("RDEIR") prepared in connection with the proposed Tracy Costco Depot Annex Project ("Project"). Since the release of the RDEIR, we have been in discussions with the Applicant's attorneys regarding the additional Project design features proposed by Costco and the potential to add additional features and/or mitigation measures to minimize the impacts of this important regional project. However, we are obliged to point out that the RDEIR still retains some of the same inadequate analysis and mitigation measures that plagued the original DEIR released in September 2022. L-1

The proposed Tracy Costco Depot Annex Project involves the construction and operation of two large warehouse buildings that would serve as an annex to the existing Costco Depot located approximately 1.5-miles to the west of the Project and as a Direct Delivery Center. The two buildings (approximately 543,526 SF for Building 1 and 1,193,198 SF for Building 2) and related infrastructure (such as parking areas) would develop almost the entire 104-acre agricultural site with impervious surfaces. The property is currently designated in the General Plan as Agriculture and zoned AG-40 Agriculture by San Joaquin County. The Project includes proposed annexation of the property into the City of Tracy and pre-zoning by the City to a Light Industrial (M-1) zoning designation. L-2

The RDEIR summarizes the following as key changes to the original DEIR:

- Increased assumed average trip length for all Project truck trips to 29 miles, which reflects the average truck trip length within the county transportation model. *See* REDIR at 1.0-1.
- Included new and additional sustainability measures and strategies to reduce emissions and vehicle trips into the Project, as provided by the Project Applicant. The Project Description chapter and the other sections were updated to reflect such Project commitments, as well as other Project refinements (such as construction schedule, etc.). *See* RDEIR at 1.0-1 and 1.0-2.
- Clarified that refrigerated warehouse space is not a part of the Project and that trucks with TRUs will not be delivering to this site. The RDEIR revised Project Description also removed "food processing/canning facility" from the Project Description so the Project no longer requires a Conditional Use Permit.

L-2 cont'd

The RDEIR states that "[f]ollowing the close of the public comment period on this Recirculated Draft EIR, the City will prepare responses to (a) the comments received during the original Draft EIR public review period on all sections of the Draft EIR not contained within this Recirculated Draft EIR and (b) all comments received on this Recirculated Draft EIR concerning the sections in this recirculated document." *See* RDEIR at 1.0-2 and 1.0-3. It is unfortunate that the City has chosen to ignore all previous comments received on the original Air Quality and GHG analyses. To ensure that all comments are addressed, we have incorporated into this letter many of the same comments on air quality and greenhouse gas emissions that were previously submitted. However, in an effort to make sure that all original and new comments are addressed, we are also attaching the original letter to this submittal. The letter dated October 31, 2022 (included as Attachment A) is incorporated herein by reference.

L-3

We continue to assert that the air quality and greenhouse gas analysis and conclusions reached in this RDEIR are inadequate and fail to meet CEQA requirements, for many of the same reasons we stated in our original letters. Most importantly, neither the original DEIR nor this RDEIR have meaningful and feasible mitigation measures to reduce identified impacts.

L-4

For the reasons set forth below, it is our opinion that the RDEIR must be revised and recirculated for further public review and comment, despite the changes listed above.

I. The RDEIR Fails to Adequately Analyze and Properly Mitigate the Project's Air Quality, Energy, and Greenhouse Gas Impacts.

The RDEIR states that "[a]lthough the Project's air quality impacts are more severe than evaluated in the Draft EIR and the Project is expected to generate a higher quantity of greenhouse gas emissions, the significance determinations for all impacts have not changed compared to those in the Draft EIR." *See* RDEIR at 1.0-2. In completing the updated assessments for the RDEIR, it was determined that the air quality impacts and GHG emissions of the Project are worse than calculated in the DEIR. However, instead of identifying measures to reduce these impacts, the RDEIR doubles down on the inadequate approach of the DEIR by (1) continuing to identify only one weak mitigation measure for the significant air quality impacts, and (2) continuing to assert that the GHG emissions impacts are less than significant, and by doing so, fails to mitigate the impacts created by the Project. L-5

The environmental documentation for the Project is thus inadequate as an informational document and violates the minimum standards of adequacy under the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA "Guidelines," California Code of Regulations, title 14, § 15000 et seq. The RDEIR identifies virtually no mitigation measures to reduce the Project's impacts, even though such measures are readily available, feasible, and commonly required. The RDEIR continues to find that impacts to air quality from the Project are significant and unavoidable, but that does not allow the RDEIR or the City to simply conclude that nothing else be done. CEQA requires that the most effective and feasible measures to reduce the impacts be adopted, even if they do not result in reducing the impacts to a less than significant level. The RDEIR remains deficient in that regard.

A. The RDEIR's Analysis of the GHG Impacts is Insufficient and the Conclusion that Impacts are Less Than Significant is Unsupported.

The RDEIR continues to assert that the greenhouse gas (GHG) emissions impacts from the Project would be less than significant despite the fact that GHG emissions were quantified and are substantial. The RDEIR asserts that because the City of Tracy does not have an adopted quantitative GHG threshold, and because the Air District does not have an adopted threshold that has been updated, a simple consistency assessment with relevant plans is sufficient to reach a conclusion of less than significant and ignore the 25,134 metric tons of Project-generated GHG emissions released on an annual basis into the San Joaquin Valley air basin. *See* RDEIR at 3.7-21 and 3.7-26. This conclusory approach does not work. *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1109 ("in preparing an EIR, the agency must L-6

consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect") dictates that the lead agency can't simply turn away from the volume of GHG emissions generated by the Project. The Project generates substantial GHG emissions, is not in conformance with the City of Tracy Sustainability Action Plan, and the RDEIR makes no attempt to establish a threshold of significance against which the project can be measured. The lead agency's responsibility here cannot be ignored.

By ignoring that the Project's emissions are significant, the RDEIR fails to adopt even the most routine mitigation measures to reduce GHG emissions and contribute the Project's "fair share" of what will be required to achieve long-term climate goals for the State. Since 2010, it has become clear from a scientific perspective that any additional GHG emissions will contribute to a serious and growing climate crisis.[1] Recognizing this reality, in 2018 Governor Brown signed Executive Order 55-18 calling for the state to achieve carbon neutrality as soon as possible and no later than 2045.[2] Given these facts on the ground, the EIR should establish a net zero threshold for new emissions. *See* e.g., CARB 2017 Scoping Plan at 101 ("Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.")[3] Not only does the EIR neglect to reference EO 55-18, it also fails to explain why this project should not be judged by a significance threshold requiring *no* net increase in GHG emissions, since that is the standard necessary to comply with the State's climate change plans and policies. L-6 cont'd

As the Supreme Court found in *Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204 ("*Newhall Ranch*"), new projects—such as this Project—may require a greater level of emission reduction because "[d]esigning new buildings and infrastructure for maximum energy efficiency and renewable energy use is likely to be easier, and is more likely to occur, than achieving the same savings by retrofitting of older structures and systems." *Newhall Ranch*, 62 Cal.4th at 226.

---

[1] Summary for Policymakers (SPM) presents key findings of the Working Group I (WGI) contribution to the Intergovernmental Panel on Climate Change (IPCC): https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf

[2] Executive Order to Achieve Carbon Neutrality: https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf

[3] California's 2017 Climate Change Scoping Plan: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery

Meanwhile, the RDEIR asserts that the sustainability measures included with the City of Tracy Sustainability Action Plan (SAP) do not apply to land use projects. *See* RDEIR at 3.7-21. The RDEIR uses the above statement to suggest that the Project should not be subject to conformance with the SAP, which is a completely unsupported assertion. The SAP includes community and municipal GHG reduction targets, and no stated reason that the Project shouldn't be in conformance with, and a party to, achieving these targets. Specifically, the SAP states:

"This Sustainability Action Plan includes a community and municipal target for greenhouse gas (GHG) emissions by 2020, as listed below. In addition, the targets in each of the subsections below will support the overall reduction targets for GHG emissions. The GHG emission targets are as follows:

- Target #1: 15 percent reduction in per capita emissions from the 2006 baseline of 11.6 metric tons of carbon dioxide equivalent.
- Target #4a: 15 percent reduction in community energy consumption from 2006 baseline levels." *See* City of Tracy SAP[4] at 4-1.

L-7

To comply with CEQA's dictates and the City of Tracy SAP, the EIR must include an analysis of the project's per capita GHG emissions and whether it is achieving a 15% reduction from the City's 2006 baseline. If not, the RDEIR must be revised and recirculated to conclude the Project is not in conformance with the SAP and therefore has significant GHG impacts. As a result, the Project must also be required to incorporate all feasible mitigation measures, including, but not limited to: (1) clean fleet and clean construction equipment requirements, (2) extensive use of on-site solar photovoltaic panels, and (3) installation of electric vehicle charging infrastructure.[5] Proven feasible measures are attached to this letter.

With regard to the qualitative analysis, the RDEIR incorrectly and without support asserts the Project would not be inconsistent with the 2022 CARB Scoping Plan. *See* RDEIR at 3-7.28. However, the unconvincing conclusion of consistency is based on no substantial evidence.

L-8

For "Transportation Electrification" the RDEIR concludes that there is "No Conflict" with the 2022 Scoping Plan and further states: "While this goal is not

[4] City of Tracy Sustainability Action Plan (2011): https://www.cityoftracy.org/home/showpublisheddocument/2950/637514921184370000
[5] *See* San Joaquin Valley Air Pollution Control District, *Emission Reduction Clean Air Measures*, https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf.

applicable to an individual commercial development project, the Project includes an EV parking requirement and includes two (2) installed EV spaces. Further, the Project would be designed to facilitate conversion of truck docks to serve electric trucks. Electric charging infrastructure would be installed on the property to facilitate the conversion of the truck fleet to zero-emission electric trucks once commercially available." *See* RDEIR at 3-7.27. Is the RDEIR suggesting that in this project of 1.7 million square feet of building with 576 parking stalls, there are only 2 EV parking spaces provided? This should be clarified. Also, how exactly will the Project be designed to "facilitate the conversion of truck docks to serve electric trucks?" If the RDEIR is relying on this fact to assert conformance with the Scoping Plan, this commitment must be included as an enforceable mitigation measure. L-8 cont'd

The RDEIR then offers the following weak justification for the assertion that the GHG impacts are less than significant, again without citing any substantial evidence: "The proposed Project would be consistent with relevant plans, policies, and regulations associated with GHGs, notably the most recent version of the CARB's Scoping Plan, and the SJCOG's 2022 RTP/SCS. This would ensure that the proposed Project would be consistent with, and would not impair, the State's carbon neutrality standard by year 2045 as established under AB 1279. The State is making progress toward reducing GHG emissions in key sectors such as transportation, industry, and electricity. Since the Project would be consistent with State GHG Plans, it would not impede the State's goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and of achieving carbon neutrality by 2045. The proposed Project would make a reasonable fair share contribution to the State's GHG reduction goals, by implementing a wide array of Project features that would reduce GHG emissions (see the list of Project features listed within the Project Sustainability Features discussion, above) and therefore, the proposed Project's GHG emissions would be considered to have a less than significant impact." *See* RDEIR at 3.7-31 and 3-7.32. But these conclusory statements provide no evidence showing how a project that adds tens of thousands of tons of GHG emissions every year could be consistent with the goal of reducing GHG emissions 40 percent below 1990 levels by 2030. Moreover, reliance on voluntary "project features" to support a less-than-significant determination is problematic because, unless these features are required as mitigation, there is no guarantee their implementation will be successful. L-9

B. The RDEIR's Analysis of Air Quality Impacts Is Incomplete.

The RDEIR (and DEIR) both identify significant and unavoidable impacts for only two air quality issues: impacts of nitrogen oxides (NOx) emissions during operations and impacts related to the Project's conflicts with adopted air quality plans. The RDEIR includes an updated analysis of truck travel assumptions to match the countywide model. The updated analysis indicates that the severity of the impacts related to diesel truck L-10

particulate and other emission is greater than previously identified in the original DEIR. However, the new analysis in the RDEIR Air Quality chapter has not resulted in any additional mitigation measures. L-10 cont'd

A letter from air quality experts Baseline Environmental Consulting was included with our original DEIR comment letter. Some of the issues identified in the Baseline letter (Attachment B) have been addressed in the RDEIR analysis, including the truck trip length, but many of the deficiencies of the original air quality analysis remain. The air quality analysis contains unsubstantiated and incomplete calculations for evaluating air pollutant emissions during Project operation. The RDEIR (and DEIR) Air Quality analysis used the CalEEMod default trip type percentages for both worker commute trips and heavy-duty truck trips: 59% of the trips were commercial-work trips (commuting) and 41% of the trips were commercial-nonwork trips (delivery). The Air Quality analysis provides no explanation or justification for not differentiating trip types based on vehicle types. Based on the proposed use of the warehouse, it would be reasonable to assume that 100% of the passenger vehicle trips will be worker commute trips and 100% of the heavy-duty truck trips will be delivery trips. L-11

Also, the RDEIR analysis, just as the previous DEIR analysis, fails to include preparation of an Air Impact Assessment (AIA) report to comply with the Indirect Source Rule 9510 required by the San Joaquin Valley Air Pollution Control District. The AIA requires applicants to identify the specific measures incorporated into the Project to meet the standards set by the District for warehouses. The RDEIR states unequivocally that "To determine how an individual project would satisfy Rule 9510, each project would submit an air quality impact assessment (AIA) to the SJVAPCD as early as possible, but no later than prior to the project's final discretionary approval, to identify the project's baseline unmitigated emissions inventory for indirect sources: on-site exhaust emissions from construction activities and operational activities from mobile and area sources of emissions (excludes fugitive dust and permitted sources)." (*See* RDEIR at 3-3.17. L-12

Rather than preparing the AIA now and including it in the RDEIR with appropriate mitigation measures to meet the regulatory goals set by the SJVAPCD, the RDEIR states weakly that "In accordance with SJVAPCD Rule 9510, an Air Impact Assessment (AIA) shall be prepared based on the applicability and exemption criteria of Rule 9510.13. The rule includes general mitigation requirements for construction and/or operational emissions. Per the general mitigation requirements of Rule 9510, the Project shall reduce the Project's operational baseline NOx emissions by 33.3% over a period of ten years as quantified in the approved AIA. The Project shall pay any off-site fees in full by the invoice due date or prior to generating the emissions associated with the Project or any phase thereof, whichever occurs first. *See* RDEIR at 3-3.36.

Failing to include this critical information in the RDEIR's analysis amounts to deferring mitigation needed to reduce impacts to a later time, which is in violation of CEQA statutes and case law. The AIA, if completed now, could yield information that could lead to measures to reduce NOx emissions and therefore reduce Project impacts. Therefore, it must be completed now and included in a recirculated EIR along with necessary mitigation measures. L-12 cont'd

Also as we noted in our October 30, 2022 letter on the original DEIR, the RDEIR states - without substantial evidence - that the Project's operational baseline NOx emissions will be reduced by 33.3% over a period of 10 years based on this future Air Impact Assessment. While this may be a regulatory requirement, it cannot serve as evidence of mitigation for this Project, because the DEIR does not identify any feasible mitigation measures beyond MM 3.3-1 that could be included in the AIA to reduce the adverse effects of criteria air pollutant emissions. The DEIR also does not evaluate if it is feasible to reduce NOx emissions beyond 33.3% and potentially below the threshold of significance. The RDEIR must be revised to include an AIA and specific mitigation measures that prove the emissions reduction goal will be met. L-13

C. The RDEIR's Analysis of Energy Impacts Is Inadequate, Flawed, and Unsupported.

For the energy analysis, the RDEIR states that the Project is anticipated to consume approximately 11,040,127 kWh of electricity per year and approximately 9,693,520 kBTU per of natural gas per year, which is an increase in both values from the 2021 DEIR. But the RDEIR still concludes that these impacts are less than significant.

The applicant has apparently committed to generating 3 megawatts (MW) of on-site solar energy. The RDEIR states that "Solar PV panels would be installed on the roof of the buildings and/or elsewhere on site (e.g., awnings or canopies in parking areas) to generate approximately 3 Megawatts (MW) of renewable electricity for use on site. Batteries would also be installed to store some of that electricity for on-site energy needs. *See* RDEIR at 3-7.23. L-14

However, no analysis of how that amount compares to the total base operational demand of the Project is provided. The RDEIR should be amended to include that analysis.

Moreover, the RDEIR asserts that the Project intends to supply 100 percent of its electricity demand from renewable sources associated with a combination of onsite generation and direct source renewable purchased energy. Specifically, the Project applicant has entered into direct source renewable purchase contracts sufficient to supply L-15

these needs. *See* RDEIR at 3.7-36. However, this commitment "to supply 100 percent of its electricity demand from renewable sources" is not included in the list of "Project Design/ Sustainability Features". Nor is it included as a required, enforceable mitigation measures. L-15 cont'd

As noted above, we have informed the applicant of the need to commit to the same solar measure that three recent Stockton projects have agreed to: namely, include sufficient solar panels on the roofs of the Project's building or in the parking lot to provide power for the operation's base power use at the start of operations and increase as base power use demand increases. Enough solar panels to power each individual building must be constructed at the same time as the building is finished, and they must be in operation prior to the first occupancy permit issued by the City. L-16

In addition, the Project must be conditioned to include enough batteries on site to provide electricity in the event of a 48-hour blackout, augmented with green energy from a local producer if needed. As noted in our earlier letter, the City must impose as mitigation all of the measures incorporated in the settlement agreement between Sierra Club and the City of Stockton to reduce energy, air quality and GHG impacts. *See* Attachment E (prior letter and final settlement agreement). The fact that the City of Stockton agreed to such measures is, of course, evidence of their feasibility.

Without providing any evidence, the RDEIR asserts that "[t]he proposed Project would comply with all existing energy standards and would not be expected to result in significant adverse impacts on energy resources. For these reasons, the proposed Project would not cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the energy-related thresholds as described by the CEQA Guidelines. This is a less than significant impact." *See* RDEIR at 3-7.36.

This refusal to identify Project impacts as significant and to require any mitigation for these energy impacts is contrary to CEQA. A project will have significant energy impacts if the Project will: L-17

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Because the RDEIR fails to quantify the energy efficiency measures that *may* be incorporated (the "green power" contracts and the solar), it cannot be assumed that the

project's energy impacts would be less than significant. In fact, *League to Save Lake Tahoe et al. v. County of Placer* (2022) 75 Cal.App.5th 63 held that that project's energy analysis was deficient because the EIR failed to analyze the project's potential use of renewable energy. The requirement to analyze renewable energy is thus a procedural requirement of CEQA. L-17 cont'd

By failing to analyze and quantify the Project's use of renewable energy as compared to the base power need for operations, the RDEIR is also failing to assess whether the total energy needs of the Project could be served by electricity generated on site and either eliminate or reduce the need for natural gas usage on site, further reducing greenhouse gas emissions by eliminating/reducing gas combustion. Yet the RDEIR concludes that the Project's operational energy use would not be wasteful because "[t]he proposed Project would be responsible for conserving energy, including through Project sustainability features, the mitigation measures provided throughout this EIR, as well as through the implementation of statewide and local measures." *See* RDEIR at 3.7-36. Again, without any assessment of how much energy these measures and features would conserve, there is no basis for the RDEIR's conclusion. L-18

Without a list of actual mitigation measures and state and local measures requiring conservation of energy, and an analysis of their effects, there is absolutely no support for the RDEIR's conclusion that operational energy use would have less than significant impacts.

D. The RDEIR Errs by Not Including an Updated Transportation Analysis or Transportation Chapter.

The RDEIR still retains references to the Transportation/Circulation chapter in the original DEIR, a chapter which is not included in the RDEIR. For example, on pages 3-7.33 and -34 the RDEIR states "Moreover, as discussed in Section 3.13: Transportation and Circulation, the proposed project would be required to implement various Transportation Demand Management (TDM) strategies that would contribute to fuel savings through incentives for project staff to utilize non-motorized transportation modes. Thus, transportation fuel consumption would not be wasteful, inefficient, or unnecessary." L-19

The RDEIR does not indicate any change to the Transportation/Circulation chapter of the original DEIR. Will this chapter be significantly updated as part of the Final EIR to reflect the increased truck trip length assumptions? The updated analysis of truck trips should be recirculated for public review.

With the recirculated Transportation/Circulation chapter, additional Transportation Demand Management (TDM) measures should be considered. The previous comments that we provided on this Chapter still apply. The revised Transportation/Circulation chapter must also include an updated mitigation measure to set a VMT Mitigation Banking Fee. In the original DEIR, as we noted in our previous letter, the calculation of this fee was seriously flawed. L-19 cont'd

E. The RDEIR Ignores the Need for, and Fails to Identify, Adequate Mitigation Measures to Reduce Project Impacts

CEQA requires lead agencies to adopt all feasible mitigation measures to reduce impacts of a development project, even if the environmental analysis finds that the impacts are significant and unavoidable. Even with the mitigation measures included in this EIR, significant and unavoidable impacts to air quality remain, and the impacts of GHG emissions and energy resources remain inaccurately characterized. For the air quality impacts, a conclusion of significant and unavoidable impacts does not allow the EIR or the City to simply conclude that nothing else can be done. CEQA mandates that an agency adopt the most effective and feasible measures to reduce a project's impacts, even if they do not reduce the impacts to a less than significant level. *See* Pub. Res. Code § 21002 (CEQA mitigation includes measures that would "substantially lessen the significant environmental effects" of a project); *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-25 ("Even when a project's benefits outweigh its unmitigated effects, agencies are still required to implement *all* mitigation measures unless those measures are truly infeasible.") (emphasis added). L-20

There are examples up and down the State of California of warehouse/fulfillment center projects that have been approved and constructed with feasible, effective, and robust measures designed to minimize the impacts of greenhouse gas emissions, reduce the effects of particulate matter and air quality degradation, and increase transportation and energy efficiency.

One of the most egregious examples of how inadequate the RDEIR's proposed mitigation measures are involves mitigation for nitrous oxide diesel truck emissions. The RDEIR includes only one weak air quality measure: requiring heavy duty trucks operating at the Project to have diesel engines that are year 2010 or newer. As detailed in the Baseline letter, the running NOx emissions from heavy-duty trucks that have a 2014 model year engine are about 77% lower than the running NOx emissions from heavy-duty trucks with a 2010 model year engine. The RDEIR doesn't provide justification to support the use of 2010 model year engines in MM 3.3-1 when the use of 2014 or later model engine years is feasible and would provide a substantially greater reduction in criteria air pollutant emissions. . L-21

With this one measure, the RDEIR concludes that "Criteria pollutant emissions generated by the proposed Project during operation would exceed applicable thresholds after compliance with all rules and regulations, even after implementation of Mitigation Measure 3.3-1. No other feasible mitigation measure exists to reduce the applicable operational criteria pollutant impacts to below the applicable SJVAPCD thresholds. Therefore, this impact would be significant and unavoidable." *See* RDEIR at 3.3-37. The RDEIR contains no factual analysis of why the inclusion of more aggressive air quality mitigation measures could not meet SJVAPCD thresholds. L-21 cont'd

In fact, Mitigation Measure AIR-1 could and must be modified to require the use of heavy-duty trucks equipped with 2014 or later model engine years when using trucks that meet a Low-NOx Standard is not immediately feasible. Furthermore, the RDEIR should also adopt mitigation requiring the phasing in of zero-emission electric trucks as they become increasingly available to further reduce criteria air pollutant emissions to the greatest extent feasible. Finally, the RDEIR should include mitigation to reduce emissions from all light and medium-duty trucks by requiring an all-electric clean fleet at the time of the start of operations. These air quality mitigation measures have already been agreed to by recent warehouse applicants in San Joaquin County and in other parts of California.

The State published additional measures in the California Sustainable Freight Initiative (a project of the California Air Resources Board). Several of the measures are applicable to the Costco Depot Annex project and should be included as mitigation measures for the Project's significant air quality impacts, including:

- Incorporate on-site renewable energy production—solar, wind, etc.—into project design; coordinate with utility providers prior to submitting permitting applications and integrate necessary infrastructure. In the case of this Project, on site solar is proposed, but a larger array should be considered to provide base power needs for the facility. This would include integrating renewable energy storage to ensure adequate storage capacities, including surplus margins, to provide alternative emergency backup power. L-22
- Commit to fully operate with zero-emissions and invest in infrastructure to support zero emission equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.
- Prioritize clean heavy duty truck parking and install zero-emission infrastructure to limit unnecessary idling, and electrify loading docks servicing trucks with TRUs or APUs.

- Incorporate fueling infrastructure to support zero-emission operations into the project to the maximum extent possible; coordinate construction plans and activities with utility providers prior to submitting permitting applications.

- In contracting, implement a rate structure that incentivizes trucking, rail, and marine companies that utilize the lowest emitting transport technologies.

L-22 cont'd

As previously noted, CEQA requires lead agencies to adopt all feasible mitigation measures to reduce impacts of a development project, even if the environmental analysis finds that the impacts are "significant and unavoidable." [*See* Pub. Res. Code § 21002 (CEQA mitigation includes measures that would "substantially lessen the significant environmental effects" of a project); *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-25 ("Even when a project's benefits outweigh its unmitigated effects, agencies are still required to implement *all* mitigation measures unless those measures are truly infeasible.") (emphasis added).

Air quality and other impacts of warehouse projects have come to the attention of the California State Attorney General's Office (AG), who has published a guide, updated in 2022, called "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act," included as Attachment C. In addition to guidance from the AG, below are examples of recent projects that were approved with more air quality and GHG minimization measures than are proposed in the RDEIR. Their approval documents with the measures to be implemented are included as attachments to this letter:

- CenterPoint Properties Warehouse Project: Buildings totaling approximately 555,537 square feet on a 31.48-acre site in the unincorporated North Richmond area of Contra Costa County. Approved May 2022. *See* CenterPoint Properties Warehouse Project Conditions of Approval (Attachment D).

L-23

- Mariposa 1 Industrial Park: Buildings totaling approximately 3.6MSF on 203 acres in the unincorporated Stockton area of San Joaquin County. Approved December 2022. *See* Mariposa Industrial Park Settlement Agreement (Attachment E).

Three major warehouse distribution projects, including the Mariposa project, that have been recently approved, or are pending approval, in south Stockton include measures that require the projects' heavy duty trucks to be equipped with diesel engines that are model year 2014 or newer, as well as other measures to hasten the transition of

dirty heavy duty diesel truck fleets to all-electric vehicles. The same or similar measures have been recommended by the AG and state regulatory agencies such as the California Air Resources Board (CARB) for the Mariposa 1 and 2 projects, and the South Stockton Commerce Center project, including:

- The project shall adopt standards to provide 100% electrification under the clean fleet requirements The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.

- The property owner/tenant/lessee shall utilize a "clean fleet" of 100% electric vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations.

- At all times during project operation, owners, operators or tenants shall be required to provide electric charging facilities on the project site sufficient to charge employee vehicles, electric bikes or scooters that are used for commuting, and all electric trucks domiciled on the site. Such facilities shall be made available for all electric vehicles that use the project site.

- The project shall include sufficient solar panels on the roofs of the project's building or in the parking lot to provide power for the operation's base power use at the start of operations and as base power use demand increases. This is equal to enough solar panels and batteries to power each individual building that must be constructed at the same time the building is finished, and in operation prior to the first occupancy permit issued by the City.

L-23 cont'd

The RDEIR must be revised to include the same or similar measures for the Project.

The executed Settlement Agreement between the Sierra Club, the City of Stockton, and Greenlaw Development, LLC (developer of the approved 203-acre Mariposa Industrial Park in the South Stockton area) is included as Attachment E to this letter. The City of Stockton and the developer agreed to include all of the mitigation measures noted above, as well as numerous other measures. In additions, the AG signed a separate Memorandum of Understanding with the City of Stockton and the developer which includes the same measures that were included in the Sierra Club settlement (Attachment F).

L-24

II. The RDEIR Is Missing Relevant Information.

In addition to the substantive content missing from the RDEIR identified in the sections above, the RDEIR also suffers from procedural flaws. The RDEIR includes only the following chapters, noting that "[t]hese chapters will substitute for and supersede those contained in the previously-circulated Draft EIR." *See* RDEIR at 1.0-2.

Chapter 1.0: Introduction
Chapter 2.0: Project Description
Section 3.2: Air Quality
Section 3.7: Greenhouse Gases, Climate Change and Energy
Chapter 4.0: Other CEQA-Required Topics
Chapter 5.0: References

L-25

RDEIR Chapter 1.0 Introduction, which now supplants the previous DEIR 1.0 Introduction, does not include all of the sections of the original DEIR (1.1 Purpose and Intended Uses of the EIR, 1.2 Type of EIR, 1.3 Known Responsible and Trustee Agencies, 1.4 Environmental Review Process, 1.5 Organization, and 1.6 Comments Received on the Notice of Preparation). In the RDEIR, this information no longer exists, which is needed in accordance with CEQA Guidelines Section 15124(d).

The RDEIR adds "Project Design/Sustainability Features" to the Project Description, but fails to quantify their effectiveness in order to conclude that impacts can be considered less than significant with the implementation of these features. The RDEIR also fails to explain how implementation of these Project Design/Sustainability Features could be enforced by the City to ensure that they are installed/operated as intended to ensure that they will minimize impacts in the way they are being characterized in the RDEIR. Would the operational details of these features be included in Project conditions of approval? Would the details of these features be included on the construction drawings that are submitted for building permits? At a minimum, the RDEIR should include an air quality mitigation measure to restate all Project Design/Sustainability Features identified in the RDEIR that are related to energy efficiency, emissions reductions, and equipment operation. The measure should state that the features will be shown on the Project plans and the measure will require the features' ongoing implementation and operation.

L-26

III. The Project Does Not Comply with Tracy General Plan Policies Related to Air Quality, GHG Emissions, and Energy Conservation.

L-27

Finally, as noted in our previous letter, the Project is inconsistent with numerous mandatory General Plan policies. The DEIR contains serious inadequacies in terms of air quality and greenhouse gas emissions impacts, and again fails to analyze the inconsistency of the Project with important General Plan policies.

These policies include, among others, AQ-1.2-P3 ("Developers shall implement best management practices to reduce air pollutant emissions associated with the construction and operation of development projects."); AQ-1.2-P14 ("Developments that significantly impact air quality shall only be approved if all feasible mitigation measures to avoid, minimize or offset the impact are implemented."); AQ-1.2- P15 ("Encourage businesses to electrify loading docks or implement idling-reduction systems so that trucks transporting refrigerated goods can continue to power cab cooling elements during loading, layovers, and rest periods."); AQ-1.4-P3 ("The City shall be proactive in reducing greenhouse gas emissions from City operations as well as new or renovated development.").

The RDEIR lists some of these relevant General Plan policies in the Greenhouse Gas chapter, but fails to analyze the Project's consistency with them. *See* RDEIR at 3-7.20. L-27 cont'd

As we noted in our earlier letter, the original DEIR failed to analyze the Project's consistency with these policies, and such inconsistencies mean the City cannot, legally, approve the Project. The State Planning and Zoning Law (Gov't Code § 65000 et seq.) requires that development decisions be consistent with the jurisdiction's general plan. See Gov't Code §§ 65860 (requiring consistency of zoning to general plan), 66473.5 & 66474 (requiring consistency of subdivision maps to general plan), and 65359 and 65454 (requiring consistency of specific plan and other development plan and amendments thereto to general plan). Thus, "[u]nder state law, the propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." *Resource Defense Fund v. County of Santa Cruz* (1982) 133 Cal.App.3d 800, 806. Accordingly, "[t]he consistency doctrine [is] the linchpin of California's land use and development laws; it is the principle which infuses the concept of planned growth with the force of law." *Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1336.

It is an abuse of discretion to approve a project that "frustrate[s] the General Plan's goals and policies." *Napa Citizens for Honest Gov't v. Napa County* (2001) 91 Cal.App.4th 342, 379. The project need not present an "outright conflict" with a general plan provision to be considered inconsistent; the determining question is instead whether the project "is compatible with and will not frustrate the General Plan's goals and policies." *Napa Citizens*, 91 Cal.App.4th at 379. Here, the proposed Project does more than just frustrate the General Plan's goals. It is directly inconsistent with numerous

policies in the General Plan. Consequently, the Project cannot be approved in its current form. Conflict with General Plan policies also presents an environmental impact requiring further CEQA analysis in that the Project does indeed 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 (CEQA Guideline Appendix G Land Use and Planning section). L-27 cont'd

IV. Conclusion

As set forth above, the RDEIR still does not satisfy CEQA's requirements. At a fundamental level, it fails to provide an adequate and complete analysis of Project impacts and feasible mitigation measures. For these reasons, the Sierra Club respectfully requests that the City recommend that the RDEIR not be certified as written, but be recirculated. The alternative would be to deny the Tracy Costco Depot Annex as proposed. All of these impacts must be more fully analyzed and mitigated before the City may approve the Project. L-28

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Winter King

Attachments:

A. Comments on the Tracy Costco Depot Annex Draft EIR, dated October 31, 2022
B. Baseline Environmental Consulting letter with Attachment A, dated October 27, 2022
C. State Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act
D. Conditions of Approval for CenterPoint Properties (May 22, 2022)
E. Sierra Club/Stockton/Greenlaw Development, LLC Settlement Agreement
F. State Attorney General Memorandum of Agreement

cc: Sierra Club, Delta Sierra Group of the Mother Lode Chapter

1741855.3

SHUTE, MIHALY & WEINBERGER LLP

Attachment A:
Comments on the Tracy Costco Depot Annex Draft EIR,
dated October 31, 2022

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

WINTER KING
Attorney
king@smwlaw.com

October 31, 2022

Via E-Mail

Genevieve Federighi, Associate Planner
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
Genevieve.Federighi@cityoftracy.org

Re: Comments on the Tracy Costco Depot Annex Draft EIR, State Clearinghouse No. 2020080531

Dear Genevieve Federighi:

On behalf of the Sierra Club, Delta Sierra Group of the Motherlode Chapter, we have reviewed the Draft Environmental Impact Report ("DEIR") prepared in connection with the proposed Tracy Costco Depot Annex Project ("Project"). The Sierra Club has serious concerns about the environmental impacts of the Project as currently proposed. As discussed in more detail below, the DEIR substantially understates, and fails to fully analyze, the severity and extent of significant project-related effects on air quality, greenhouse gas ("GHG") emissions, and public health. The environmental documentation for the Project is thus inadequate as an informational document and violates the minimum standards of adequacy under the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA "Guidelines," California Code of Regulations, title 14, § 15000 et seq. Moreover, the DEIR identifies virtually no mitigation measures to reduce the Project's impacts, even though such measures are readily available, feasible, and commonly required. The DEIR found that impacts to air quality and greenhouse gas emissions from the project were significant and unavoidable, but that does not allow the DEIR or the City to simply conclude that nothing else be done. CEQA requires that the most effective and feasible measures to reduce the impacts be adopted, even if they do not result in reducing the impacts to a less than significant level. This DEIR is woefully deficient in that regard. L-29

The proposed Project would implement construction and operation of two large warehouse buildings that would serve as an annex to the existing Costco Depot located

approximately 1.5-miles to the west of the Project and as a Direct Delivery Center. The two buildings (approximately 543,326 sf for Building 1 and 1,201,726 sf for Building 2) and related infrastructure (such as parking areas) would develop almost the entire 104-acre agricultural site with impervious surfaces. The property is currently designated as Agriculture and zoned as AG-40 Agriculture by San Joaquin County. The project includes proposed annexation of the property into the City of Tracy and pre-zoning by the City to a Light Industrial (M-1) zoning designation.

L-29 cont'd

For the reasons set forth below, it is our opinion that the DEIR does not comply with the requirements of CEQA, and must be revised and recirculated for further public review and comment. Referenced throughout these comments is an air quality report prepared by Baseline Environmental Consulting ("Baseline Report"), which is attached as Appendix A and is incorporated herein by reference. Please refer to this report for further detail and discussion of the DEIR's inadequacies with regard to impacts on air pollution and related health risks. We request that the City respond to both the comments in this letter and to each of the comments in the Baseline Report.

I. The Project Description Fails to Adequately Describe All Aspects of the Project.

Under CEQA, the inclusion in the DEIR of a clear and comprehensive description of the proposed project is critical to meaningful public review. *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193 ("*Inyo II*"). The court in *Inyo II* explained why a thorough project description is necessary;

> "A curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance."

L-30

Id. at 192-93. Thus, "[a]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient DEIR." *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 830.

Here, the Project description fails to include sufficient detail about the proposed use of the facility, devoting just a couple of sentences to this topic:

> "The smaller Building 1 is anticipated to serve as an annex by providing additional storage for high-turnover merchandise

> processed through the nearby Costco Depot, a pallet repair facility, and a return to vendor (RTV) facility for large items returned to a Costco warehouse. The larger Building 2 is anticipated to serve as a Direct Delivery Center (DDC), which is an ecommerce distribution center primarily for large and bulky items ordered online by Costco members for direct delivery. "

L-30 cont'd

DEIR at 2.0-3.

More information is needed for the public and decisionmakers to consider the Project's potential environmental impacts. For example, the Project Description must disclose how many trucks will visit the site each day, where they will be coming from, and what types of materials they will be transporting. In addition, more information is needed about where materials will be unloaded/loaded and what will be done with the materials and goods inside the warehouse (e.g., will there be construction-type work (including noise and potential odors/dust) at the pallet repair facility?), how long trucks will remain on site, what nighttime activities will occur, etc.

The Project Description also mentions in passing that the applicant is also requesting "a Conditional Use Permit to allow for food processing and canning in the proposed M-1 zoning district." DEIR at 2.0-9. But these uses are not included in the description of the intended uses of the two proposed buildings, and the DEIR fails to describe the extent of these uses. For example, there is no discussion of whether these uses would rely on refrigerated truck or storage facilities; whether they would emit odors; or where the food to be processed would be coming from. This missing information is critical to an adequate EIR, because food processing/canning facilities have different potentially significant environmental impacts than facilities that are used to transport and store non-refrigerated items. For example, the air quality and greenhouse gas emissions associated with refrigerated facilities are much higher than non-refrigerated facilities. Additionally, the noise and odor impacts associated with food processing facilities can vary widely and can be a significant environmental concern. Without having information on the specifics of how large the food processing facility might be, hours of operation, specific equipment employed for the use, etc., the impacts cannot adequately be studied.

L-31

Lastly, the figures at the end of the Project Description chapter are misleading and confusing. For example, Figure 2.0-4 does not provide a legible diagram of ingress/egress, and no diagram legibly shows where the stormwater detention basin will be. Figure 2.0-5 and 2.0-6 are confusing because they purport to show existing and proposed land uses on the same diagram. The DEIR must contain separate diagrams

L-32

showing existing and proposed uses so the public and decisionmakers can understand what is being depicted and compare existing and proposed.

L-32 cont'd

II. The DEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts.

Air pollution from significant activities in the San Joaquin Valley Air Basin includes a variety of industrial-based sources as well as on- and off-road mobile sources. These sources, coupled with geographical and meteorological conditions unique to the area, stimulate the formation of unhealthy air. DEIR at 3.3-1. San Joaquin County is in non-attainment of Ozone, PM_{10} and $PM_{2.5}$ State air quality standards. DEIR at 3.3-10. Breathing in particulate matter (PM_{10} and $PM_{2.5}$) and ground-level ozone can trigger a variety of health problems. Heavy-duty trucks are key sources of diesel pollution and toxic air contaminants (TACs) and are therefore a focus of air quality impacts. Diesel trucks emit large volumes of particulate matter (a.k.a. diesel particulate matter, or DPM), therefore contributing to health problems that include cardiovascular problems, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death.[1]

L-33

The public health risks associated with these pollutants are severe, as the DEIR acknowledges:

> "The reactivity of O3 causes health problems because it damages lung tissue, reduces lung function and sensitizes the lungs to other irritants. Scientific evidence indicates that ambient levels of O3 not only affect people with impaired respiratory systems, such as asthmatics, but healthy adults and children as well. Exposure to O3 for several hours at relatively low concentrations has been found to significantly reduce lung function and induce respiratory inflammation in normal, healthy people during exercise. This decrease in lung function generally is accompanied by symptoms including chest pain, coughing, sneezing and pulmonary congestion."

DEIR at 3.3-4.

[1] Storing Harm: the Health and Community Impacts of Goods Movement Warehousing and Logistics, January 2012, available at: https://envhealthcenters.usc.edu/wp-content/uploads/2016/11/Storing-Harm.pdf; accessed June 2, 2021.

> "Some studies indicate that DPM poses the greatest health risk among the TACs listed above. A 10- year research program demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk. In addition to increasing the risk of lung cancer, exposure to diesel exhaust can have other health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. Diesel exhaust is a major source of fine particulate pollution as well, and studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems."

L-33 cont'd

DEIR at 3.3-22.

Given these existing air quality problems and severe public health consequences, the City needs to do everything in its power to ensure new development does not exacerbate the problem. Unfortunately, the DEIR does not adequately analyze or mitigate the Project's impacts. As stated in the attached comments from Baseline Environmental Consulting (Appendix A), there are flaws in the DEIR analysis used to support the significance determinations, such as unsubstantiated and incomplete calculations for evaluating air pollutant emissions during project operation.

In addition, though the DEIR estimates the Project will generate "2,576 passenger vehicle trips and 1,224 heavy-duty truck trips per day," DEIR at 3.3-31, there is currently no proposed condition of approval limiting operations to that level. The City should impose a condition limiting the number of trucks. If the applicant wishes to increase operations in the future, they could come back to modify that condition—and conduct necessary additional CEQA review at that time.

The DEIR's evaluation of potential mitigation measures is equally flawed, if not more so. CEQA requires that (1) a project's significant impacts be fully disclosed in detail, (2) mitigation be fully enforceable and not improperly deferred, (3) the City adopt all feasible mitigation to mitigate a Project's impacts, and (4) the DEIR provide for an adequate mitigation monitoring and reporting program. Here, Tracy's General Plan provides sound guidance as well: "Developments that significantly impact air quality shall only be approved if all feasible mitigation measures to avoid, minimize or offset the impact are implemented." DEIR 3.3-13 (citing General Plan Policy AQ-1.2-P14). And to

L-34

confirm conformity with the Air District's Air Quality Attainment Plan, the California Air Resources Board requires that any new project "contain in its design all reasonably available and feasible air quality control measures." DEIR 3.3-28.

It is not clear from the DEIR what project features are incorporated, or what mitigation measures are required, to reduce the Project's air quality impacts. Instead, there are multiple references to other entities regulations: "The Project incorporates various policy and rule-required implementation measures that would reduce related emissions, including all of the current Air District rules and regulations." DEIR at 3.3-28. Additionally, the DEIR refers to the completion of a future Air Impact Assessment (compliance with San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 9510) and other regulatory compliance requirements. Such oblique references undermine CEQA's core informational purpose. Moreover, many of the regulations cited in the DEIR would not apply directly to this project, but rather apply to truck and equipment manufacturers. The USEPA Clean Trucks Plan and CARB Omnibus Low-NOx Rule are two of these rules, which are outside of the control of the Project to implement or enforce. DEIR at 3.3-22. L-34 cont'd

These oblique references also obscure deferred mitigation measures. Feasible mitigation measures must be identified and analyzed in this DEIR. If mitigation measures are deferred until after Project approval or are so undefined that it is impossible to evaluate their effectiveness, the EIR violates CEQA. Mitigation measures may not be deferred when their effectiveness is uncertain or when deferral would prevent the DEIR from disclosing the potentially significant impacts of those measures. *Sacramento Old City Ass'n v. City Council of Sacramento*, 229 Cal.App.3d 1011, 1027-29 (1991). Uncertainties regarding the mitigation of impacts must be resolved before a lead agency may make the required CEQA findings; an agency may not rely on mitigation measures of uncertain efficacy or feasibility. *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 727 (1990). An agency may defer preparation of a plan or completion of a study only when the agency commits itself and/or the project proponent to satisfying specific performance standards that will ensure avoidance of any significant effects. *Id.*

Here, the DEIR fails to follow these mandates. For example, the DEIR refers to the indirect source rule (ISR or Rule 9510), but fails to describe how this Project will comply with it, or what any mitigation fees will be used to fund. DEIR at 3.3-15. Similarly, the DEIR refers to a requirement to submit an Employer Trip Reduction Implementation Plan (ETRIP), but does not provide any information about what this applicant has proposed to include or any means to ensure that there are meaningful results from the program. DEIR at 3.3-17.

The DEIR must be revised to identify all of the project features, external regulations, and mitigation measures designed to reduce the Project's air quality impacts, along with an analysis of how well those measures are anticipated to work. It's not enough to declare that impacts are significant and unavoidable without any analysis of how they were determined to be significant. CEQA requires that an EIR set forth, in detail, all of a project's potentially significant environmental impacts. Without this, decision makers and the public are left with no real idea as to the severity and extent of environmental impacts. See, e.g., *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1370-71; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1123; *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831 (a lead agency may not simply jump to the conclusion that impacts would be significant without disclosing to the public and decision makers information about how adverse the impacts would be). Only after describing the impacts can the DEIR identify all feasible mitigation measures for each significant impact. *Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, 653 (citing Pub. Resources Code § 21100(b)). This sequence—analyze impacts first, then identify mitigation—is crucial, as "[o]nly by [the agency] making this disclosure can others, be they courts or constituents, intelligently analyze the logic of the [agency's] decision." *Id.* at 654 (citation omitted).

L-34 cont'd

Given the project's acknowledged significant air quality impacts, the DEIR must also identify (and the City must require) additional mitigation measures to minimize these impacts. There are many examples of feasible and responsible measures to improve air quality and it is surprising that a company as progressive as Costco Wholesale has not incorporated more of these into their standard facility design. The proposed project already includes designing the proposed buildings to structurally accommodate future installation of a rooftop solar system. As such, the design of the proposed project would facilitate the future commitment to renewable energy resources. DEIR at 3.7-31. The structural aspect of rooftop solar is already being incorporated and those funds are being spent, yet the project fails to include installation of the photovoltaic system now to mitigate for the project's emissions. Similarly, the project proposes to include the infrastructure for electric vehicle charging stations but not the stations themselves. Including these charging stations is another feasible air quality mitigation measure that must be included.

The SJVAPCD published a list of measures designed to reduce air quality impacts associated with development projects, which should be consulted for application to this project. These measures are attached as Appendix B and are incorporated herein by reference. Some of the relevant measures identified by the SJVAPCD include the following:

- Adopt operational zero or near-zero (0.02 g/bhp-hr NOx) emission Heavy Duty (HHD) fleets.
- Use of on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc. from development projects to utilize zero-emissions technologies as feasible.
- Use of a "Construction Clean Fleet" that will reduce construction emissions by 20% for oxides of nitrogen (NOx) and 45% for particulate matter of 10 microns or less in size (PM_{10}) from the statewide average as estimated by the Air Resource Board ARB. A Construction Clean Fleet for a project includes all the pieces of construction equipment that are greater than 50 horse power and generate emissions from the use of an internal combustion engine related to construction activity. On average a mix of construction fleet with engine model years five (5) years or newer from the current calendar year would likely achieve the required reduction for NOx and PM_{10}.

In addition to the local air district's suggested measures, the State published additional measures in the California Sustainable Freight Initiative (a project of the California Air Resources Board). This document is attached as Appendix C and is incorporated herein by reference. Several of the measures applicable to the Costco Depot Annex project include: L-34 cont'd

- Incorporate on-site renewable energy production—solar, wind, etc.—into project design; coordinate with utility providers prior to submitting permitting applications and integrate necessary infrastructure.
- Integrate renewable energy storage to ensure adequate storage capacities, including surplus margins, to provide alternative emergency backup power.
- Commit to fully operate with zero-emissions and invest in infrastructure to support zero emission equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.
- Prioritize clean heavy duty truck parking and install zero-emission infrastructure to limit unnecessary idling, and electrify loading docks servicing trucks with TRUs or APUs.
- Incorporate fueling infrastructure to support zero-emission operations into the project to the maximum extent possible; coordinate construction plans

and activities with utility providers prior to submitting permitting applications.

- In contracting, implement a rate structure that incentivizes trucking, rail, and marine companies that utilize the lowest emitting transport technologies.

Lastly, there is a recent example of a warehouse project that is incorporating additional air quality mitigation measures into their site and building design. In Contra Costa County, the CenterPoint Properties Warehouse Distribution Facility project in North Richmond is a 555,000 square foot project on 31.5 acres. The project was approved by the County with additional conditions of approval related to minimizing air quality impacts, reducing greenhouse gas emissions, electrifying the truck fleet, and reducing energy consumption in the buildings. The final Conditions of Approval for the CenterPoint Project are attached as Appendix D and are incorporated herein by reference. L-34 cont'd

The CenterPoint project illustrates that there are multiple feasible measures available to mitigate the Project's significant air quality and greenhouse gas emissions impacts. In addition, the State Attorney General has published "Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act", attached as Appendix E and incorporated herein by reference. Lastly, the Sierra Club has drafted a list of suggested mitigation measures that should also be considered for incorporation into the DEIR, attached as Appendix F and incorporated herein by reference.. Appendices B, C, D, E, and F all contain examples of measures that are suitable for this project, and they showcase measures that are being included as commonly-utilized best practices for warehouse development. These measures address clean energy production to power the facility, moving towards electrification of truck fleets, construction BMPs to control dust, and reducing vehicle trips to the site. There is no reason that this project should not also implement these measures and bring a better project forward for the City of Tracy.

III. The DEIR's Transportation Analysis for the Project Is Inaccurate and Inadequate.

Under CEQA, a lead agency must analyze a project's transportation impacts. Pursuant to Public Resources Code Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." In particular, an EIR must address whether the Project will: L-35

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b);

c. Substantially increase hazards due to a geometric design feature; or

d. Result in inadequate emergency access.

L-35 cont'd

In addition, numerous General Plan policies also require new development to safely handle new traffic, ensure bicycle and pedestrian safety, connect trails, etc. Tracy General Plan, Policies CIR-1.2-P3 ("New development shall be designed to provide vehicular, bicycle and pedestrian connections with adjacent developments."); CIR-3.1-P6 ("New development shall include pedestrian and bicycle facilities internal to the development and that connect to city-wide facilities, such as parks, school, and recreational corridors, as well as adjacent development and other services."); CIR-3.1-P7 ("New development sites for commercial, employment, educational, recreational, and park-and-ride land uses shall provide bicycle parking and/or storage facilities."); CIR-4.1-P5 ("The City shall require development to provide for transit and transit-related increased modal opportunities, such as adequate street widths and curb radii, bus turnouts, bus shelters, park-and-ride lots and multi-modal transit center through the development and environmental review processes, if appropriate.").

The DEIR fails to comply with this CEQA requirement and also fails to demonstrate that the Project complies with the aforementioned General Plan requirements.[2] In particular, the DEIR analysis shows that the Project would generate 24.8 VMT per employee, exceeding the City's average VMT by *164%*. DEIR at 3.13-12. Nonetheless, the measures identified to reduce VMT would only do so by 15% (in a best-case scenario where all measures were as effective as possible). DEIR at 3.13-13. In fact, in order to reduce impacts to less than significant, the Project would have to reduce VMT to 15% below the local average.[3]

Making matters worse, the "mitigation" relied on by the DEIR is entirely hypothetical and largely deferred. As the DEIR admits, the VMT mitigation banking program has not yet been established. If it is not in place by the time mitigation is

L-36

[2] Failure to comply with these General Plan requirements violates State Planning and Zoning law.
[3] Based on guidance from the Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (April 2018)

required, the DEIR simply states "the TDM program will need to achieve the full 15 percent." DEIR 3.13-13. But there is no evidence to support the conclusion that a TDM program could reduce VMT by 15%, much less reduce it below the City's Draft VMT threshold of 9.4 VMT per employee.

In fact, Table 3.13-2 seems to show the applicant's position that only two measures on the list of possible TDM measures are feasible. While that is clearly incorrect (e.g., a number of measures simply require the financial support, and there is no evidence suggesting those are infeasible), it definitely calls into question the conclusion that the City and applicant can come up with replacement measures to reduce VMT if the banking program is not in place. As noted above, an agency may defer the development of actual, specific mitigation measures only if it meets three separate requirements: (1) the EIR contains "performance standards" that will govern future actions implementing the mitigation, (2) the agency has assurances that the future mitigation will be both "feasible and efficacious," and (3) practical considerations preclude developing the mitigation before project approval. *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93-95 ("*CBE*") (rejecting "the perfunctory listing of possible mitigation measures … [that] are nonexclusive, undefined, untested and of unknown efficacy"). This standard is not met here. L-36 cont'd

In reality, there are feasible mitigation measures the City and applicant can implement now to reduce VMT. These measures include establishing an employee ride-sharing program, providing end of trip facilities such as showers and locker rooms for employees riding bikes, offering new employee commute orientation, providing preferential carpool and electric vehicle parking program, establishing an employer-sponsored vanpool from a central location determined by participating employees, employer-sponsored shuttle to/from key transit station(s) or other transit hub, four-day work week to reduce travel, and offering carpool/vanpool ride-matching services. While the DEIR states that applicants typically do not like measures that require an ongoing commitment to implement, that preference is not a valid reason under CEQA to reject a mitigation measure.

The Project must also be revised to comply with General Plan requirements for including bike storage, maintaining trail connectivity, etc. There is no evidence to suggest such measures would be infeasible.

In sum, the transportation analysis must be re-done to comply with CEQA and the General Plan. The threshold of significance must be revised to require VMT reduction below existing average VMT, additional mitigation measures and project components must be considered, and the DEIR must be recirculated for public review.

IV. The DEIR's Analysis of Project-Related Greenhouse Gas Emissions and Energy Impacts Is Flawed.

Climate Change is the defining issue of our time and we are at a defining moment. From shifting weather patterns that threaten food production, to rising sea levels that increase the risk of catastrophic flooding, the impacts of climate change are global in scope and unprecedented in scale.[4]

CEQA serves as one of the State's frontline tools in combatting climate change; careful attention to analyzing and mitigating the air quality impacts and greenhouse gas emissions of projects are paramount to improving community conditions on the local scale and combating climate change at every level. As the Supreme Court found in *Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204 ("*Newhall Ranch*"), it may not make sense to translate a general standard (in that case AB 32's requirement to reduce emissions to 1990 levels by 2020) to a specific project. In fact, *Newhall Ranch* noted that new projects—such as this Project—may require a greater level of emission reduction because "[d]esigning new buildings and infrastructure for maximum energy efficiency and renewable energy use is likely to be easier, and is more likely to occur, than achieving the same savings by retrofitting of older structures and systems." *Newhall Ranch*, 62 Cal.4th at 226. L-37

Since 2010, it has become clear from a scientific perspective that any additional GHG emissions will contribute to a serious and growing climate crisis.[5] Recognizing this reality, in 2018 Governor Brown signed Executive Order 55-18 calling for the state to achieve carbon neutrality as soon as possible and no later than 2045.[6] Given these facts on the ground, the DEIR should establish a net zero threshold for new emissions. See e.g., CARB 2017 Scoping Plan at 101 ("Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.")[7] Not only does the DEIR neglect to reference EO 55-

[4] United Nations: https://www.un.org/en/global-issues/climate-change#:~:text=Climate%20Change%20is%20the%20defining,scope%20and%20unprecedented%20in%20scale.

[5] Summary for Policymakers (SPM) presents key findings of the Working Group I (WGI) contribution to the Intergovernmental Panel on Climate Change (IPCC): https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf

[6] Executive Order to Achieve Carbon Neutrality: https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf

[7] California's 2017 Climate Change Scoping Plan: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery

18, it also fails to explain why this project should not be judged by a significance threshold requiring *no* net increase in GHG emissions, since that is the standard necessary to comply with the State's climate change plans and policies.

Here, as described in the attached comments from Baseline Environmental Consulting, the DEIR failed to comply with CEQA's requirements for analysis and mitigation. Instead, it omitted essential information about the Project's GHG impacts, understated those impacts that were disclosed, and failed to adopt even the most routine mitigation measures. Specifically, the Baseline report found the following flaws in the analysis:

a. Underestimated Emissions from Warehouse Vehicle Trips. The default trip lengths used to model GHG emissions were countywide averages for all vehicle and land use types, which are not representative of the vehicle trips generated at a warehouse. The Air Quality analysis did not provide substantial evidence to support this approach, which has resulted in a significant underestimation of the total vehicle miles travelled (VMT) and associated criteria air pollutant and GHG emissions.

L-37 cont'd

b. Incomplete Analysis of Emissions from Refrigeration. The Project Description (DEIR at 2.0-4) refers to refrigeration systems in the warehouses. Additionally, the DEIR indicated that Truck Refrigeration Units (TRUs) are expected to be in use on approximately 15% of the heavy-duty trucks that travel to and from the project site for the Annex (DEIR at 3.3-33). Yet, the DEIR Air Quality analysis modeled emissions from an *unrefrigerated* warehouse. As a result, the Air quality analysis likely underestimated the operational criteria air pollutant and GHG emissions associated with energy use at a refrigerated warehouse. In addition, the air quality analysis did not include estimated criteria air pollutant and GHG emissions from the engines of TRUs during project operation. Therefore, the DEIR's analysis on operational criteria air pollutants and GHG emissions is incomplete.

c. Inadequate Mitigation for Significant and Unavoidable Impact. The DEIR Air Quality analysis concluded that the project would have a significant and unavoidable impact for criteria air pollutant emissions. The only mitigation measure identified was MM 3.3-1, which requires the use of trucks that have a 2010 model year or newer engines. The effectiveness of this mitigation measure was not evaluated in the Air Quality analysis "*due to the difficulty in modeling the emissions...* ". This is not difficult to model and should have been provided in the DEIR analysis. It is also not clear in the DEIR if Costco would own all the trucks accessing the Costco warehouses. If some trucks are owned and operated by a third party, then MM 3.3-1 does not identify how the engine year for 3rd party truck fleets would be effectively monitored and enforced. The DEIR also discussed that the project's operational baseline NOx emissions will be

reduced by 33.3% over a period of 10 years based on an Air Impact Assessment (AIA) that will need to be prepared to comply with SJVAPCD Rule 9510. While this may be a regulatory requirement, it cannot serve as evidence of mitigation for this project, because the DEIR does not identify any feasible mitigation measures beyond MM 3.3-1 that could be included in the AIA to reduce the adverse effects of criteria air pollutant emissions. The DEIR also does not evaluate if it is feasible to reduce NOx emissions beyond 33.3% and potentially below the threshold of significance. L-37 cont'd

d. Inadequate Analysis of GHG Emissions. Based on the California Supreme Court findings for *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, a project's GHG emissions should be evaluated based on its effect on California's efforts to meet the State's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its "fair share" of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change. *Id.* at 220-23.

The DEIR analysis only evaluated the project's consistency with measures from the 2017 Scoping Plan and Regional Transportation Plan and Sustainable Communities Strategy. Demonstrating consistency with these plans does not provide evidence that an individual project would contribute its "fair share" of what will be required to achieve the State's long-term climate goals. Furthermore, these plans only address the Statewide climate goal for 2030 and do not consider California's long-term climate goal of carbon neutrality by 2045. L-38

To determine an individual project's "fair share," the DEIR analysis should focus on the design elements that need to be incorporated into the project to support carbon neutrality by 2045. The primary sources of GHG emissions from the project warehouses would be from building energy use and transportation; therefore, the DEIR should evaluate if the project can be designed to ensure it will be carbon neutral by 2045.

In addition to the issues raised in the Baseline letter, the DEIR improperly assumes that the State will handle all necessary GHG emission reductions to achieve Executive Order S-3-05's goals:

> "Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that operation of the project would be required to comply with whatever

> measures are enacted that State lawmakers decide would lead to an 80 percent reduction below 1990 levels by 2050."

DEIR at 3.7-28.

But such assumptions violate CEQA. Rather than assuming, with no evidentiary support, that the environmental problem will be handled by someone else, the DEIR needs to identify specific, feasible mitigation to reduce this Project's potential GHG impacts now. This is especially true because the Project, if approved, will be built and operational long before many of the anticipated state laws will have had time to take effect. (E.g., California Air Resource Board's Advanced Clean Truck regulation, which applies to truck manufacturers and will depend on fleet turnover to reduce emissions and transition from the conventional combustion technologies to zero emission trucks over time.)

L-38 cont'd

Similarly, the DEIR's conclusion that the Project would be consistent with climate change plans and policies, and therefore would have less than significant climate change impacts, is not supported by substantial evidence. It is undisputed that this project will generate approximately 3,800 new daily vehicle trips. DEIR 3.7-30. Transportation is one of the biggest emitters of GHGs at 27% of total U.S. emissions by economic sector.[8] Yet, the DEIR adopts no mitigation to reduce GHG emissions from these trips, even though mitigation is plainly feasible. Without this mitigation, the Project will continue to be served by diesel trucks and gasoline cars, potentially for decades to come. As noted in the Air Quality section of this letter above, there are numerous feasible mitigation measures that could reduce the Project's climate change impacts that should be implemented into this EIR.

This refusal to identify or require any mitigation for these impacts also undermines the DEIR's conclusion that the Project will have less than significant energy impacts. A project will have significant energy impacts if the Project will:

> a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

[8] US Environmental Protection Agency's Sources of Greenhouse Gas Emissions: https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions#:~:text=The%20primary%20sources%20of%20greenhouse,share%20of%20greenhouse%20gas%20emissions.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Because the project includes such minimal energy efficiency measures and doesn't incorporate renewable energy production on site despite ample opportunity to do so, it cannot be assumed that the project's energy impacts would be less than significant. In fact, *League to Save Lake Tahoe et al. v. County of Placer* (2022) 75 Cal.App.5th 63 held that that project's energy analysis was deficient because the EIR failed to analyze the project's potential use of renewable energy. The requirement to analyze renewable energy is thus a procedural requirement of CEQA.

Here, the Project will use approximately 353,602 gallons of gasoline and 817,549 gallons of diesel per year], 7,939,980 kWh of electricity per year, which is enough electricity to power over 1,100 average California homes annually[9]. The project would also use approximately 10,557,560 kBTU of natural gas per year. By failing to analyze the project's potential use of renewable energy such as solar, the DEIR is also failing to assess whether the energy needs of the project could be served by electricity generated on site and either eliminate or reduce the need for natural gas usage on site, further reducing greenhouse gas emissions by eliminating/reducing gas combustion. Yet the DEIR concludes that the Project's operational energy use would not be wasteful because "[t]he proposed Project would be responsible for conserving energy, including through the mitigation measures provided throughout this EIR, as well as through the implementation of statewide and local measures." DEIR at 3.7-33. Without a list of actual mitigation measures and state and local measures requiring conservation of energy, and an analysis of their effects, there is absolutely no support for the DEIR's conclusion that operational energy use would have less than significant impacts.

L-38 cont'd

The DEIR's analysis of construction energy use is even wobblier. That "analysis" relies on an unsupported assumption to conclude energy use will not be wasteful or inefficient:

> "[I]t is reasonable to assume that the overall construction schedule and process would be designed to be as efficient as feasible in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for

[9] U.S. Energy Information Administration: https://www.eia.gov/consumption/residential/reports/2009/state_briefs/pdf/ca.pdf

> further future efficiency gains during construction are limited."

DEIR at 3.7-32.

This assumption is not reasonable, nor is it supported by substantial evidence, which is defined as "the degree of relevant evidence which a reasonable person, considering the record as a whole, might accept as adequate to support a conclusion, even though other reasonable persons might disagree. The best way to reduce these energy impacts would be to require use of low-emissions, electric or zero emissions equipment. There is no reason to assume that the applicant will acquire and use such efficient equipment absent enforceable requirements to do so (i.e., mitigation measures). L-38 cont'd

With respect to transportation, the project could be designed to provide sufficient electric vehicle (EV) charging stations for cars as well as for heavy-duty trucks to support the shift to EVs. The DEIR does not evaluate these potential energy mitigation measures, contrary to CEQA.

In short, CEQA requires more when it comes to analyzing a project's energy impacts and identifying mitigation measures that would support a "less-than-significant" conclusion. Here, the Project would clearly use very large amounts of energy, and there are numerous feasible mitigation measures referenced earlier in this letter and included as Appendices C, D, E and F that could make the Project more efficient. As a result, the DEIR must be revised to consider these mitigation measures and their effect.

V. The Project Does Not Comply with the Tracy General Plan

As noted in previous sections of this letter, the Project is inconsistent with numerous mandatory General Plan policies including Policies: AQ-1.2-P3 ("Developers shall implement best management practices to reduce air pollutant emissions associated with the construction and operation of development projects."); AQ-1.2-P14 ("Developments that significantly impact air quality shall only be approved if all feasible mitigation measures to avoid, minimize or offset the impact are implemented."); AQ-1.2-P15. ("Encourage businesses to electrify loading docks or implement idling-reduction systems so that trucks transporting refrigerated goods can continue to power cab cooling elements during loading, layovers, and rest periods."); AQ-1.4-P3. ("The City shall be proactive in reducing greenhouse gas emissions from City operations as well as new or renovated development."); CIR-1.2-P3 ("New development shall be designed to provide vehicular, bicycle and pedestrian connections with adjacent developments."); CIR-3.1-P6 ("New development shall include pedestrian and bicycle facilities internal to the development and that connect to city-wide facilities, such as parks, school, and L-39

recreational corridors, as well as adjacent development and other services."); CIR-3.1-P7 ("New development sites for commercial, employment, educational, recreational, and park-and-ride land uses shall provide bicycle parking and/or storage facilities."); and CIR-4.1-P5 ("The City shall require development to provide for transit and transit-related increased modal opportunities, such as adequate street widths and curb radii, bus turnouts, bus shelters, park-and-ride lots and multi-modal transit center through the development and environmental review processes, if appropriate."). The DEIR fails to analyze the Project's consistency with these policies, and such inconsistencies mean the City cannot, legally, approve the Project.

The State Planning and Zoning Law (Gov't Code § 65000 et seq.) requires that development decisions be consistent with the jurisdiction's general plan. See Gov't Code §§ 65860 (requiring consistency of zoning to general plan), 66473.5 & 66474 (requiring consistency of subdivision maps to general plan), and 65359 and 65454 (requiring consistency of specific plan and other development plan and amendments thereto to general plan). Thus, "[u]nder state law, the propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements." *Resource Defense Fund v. County of Santa Cruz* (1982) 133 Cal.App.3d 800, 806. Accordingly, "[t]he consistency doctrine [is] the linchpin of California's land use and development laws; it is the principle which infuses the concept of planned growth with the force of law." *Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1336. L-39 cont'd

It is an abuse of discretion to approve a project that "frustrate[s] the General Plan's goals and policies." *Napa Citizens for Honest Gov't v. Napa County* (2001) 91 Cal.App.4th 342, 379. The project need not present an "outright conflict" with a general plan provision to be considered inconsistent; the determining question is instead whether the project "is compatible with and will not frustrate the General Plan's goals and policies." *Napa Citizens*, 91 Cal.App.4th at 379. Here, the proposed Project does more than just frustrate the General Plan's goals. It is directly inconsistent with numerous policies in the General Plan. Consequently, the Project cannot be approved in its current form. Conflict with General Plan policies also presents an environmental impact requiring further CEQA analysis in that the Project does indeed 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 (CEQA Guideline Appendix G Land Use and Planning section).

VI. Conclusion

As set forth above, the DEIR does not come close to satisfying CEQA's requirements. At a fundamental level, it fails to provide an adequate and complete L-40

analysis of Project impacts and feasible mitigation measures. For these reasons, the Sierra Club respectfully requests that the City deny the Tracy Costco Depot Annex as proposed. All of these impacts must be more fully analyzed and mitigated before the City may approve the Project.

On a broader scale, the Sierra Club is monitoring warehouse project development in the cities of Stockton, Tracy, Lathrop, and Manteca and we will be submitting similar comments on all upcoming projects throughout these jurisdictions. In Tracy, according to the City's website, there are several large warehouse projects that are "being reviewed by the City." The Club will monitor and submit comments on these upcoming projects and their environmental analyses. Our hope is that the City of Tracy will agree to apply similar effective mitigation measures for all warehouse projects, so that all applicants are playing on a level field. The Sierra Club wishes to meet with City Staff to discuss this at your earliest convenience.

L-40 cont'd

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Winter King

Appendices:
Appendix A: Baseline Environmental Consulting letter with Attachment A, dated October 27, 2022
Appendix B: San Joaquin Valley Air Pollution Control District Land Use Design Element and Mitigation Measures (undated)
Appendix C: California Sustainable Freight Initiative Freight Handbook Concept Paper (December 2019)
Appendix D: Conditions of Approval for CenterPoint Properties (May 22, 2022)
Appendix E: State Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act
Appendix F: Suggested Mitigation Measures

cc: Sierra Club, Delta Sierra Group of the Motherlode Chapter

SHUTE, MIHALY & WEINBERGER LLP

Attachment B:
Baseline Environmental Consulting letter with
CalEEMod outputs, dated October 27, 2022

Attachment B:
Baseline Environmental Consulting letter with
Attachment A, dated October 27, 2022

BASELINE ENVIRONMENTAL CONSULTING

27 October 2022
22221-00

Carmen J. Borg
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421

Subject: **Review of Air Quality and Greenhouse Gas Impacts Analyzed in the Draft DEIR for the Tracy Costco Depot Annex Project**

Dear Ms. Borg:

Baseline Environmental Consulting (Baseline) has reviewed the Draft Environmental Impact Report (DEIR) for the Tracy Costco Depot Annex Project (project) in the City of Tracy to determine whether potential environmental impacts related to air quality and greenhouse gas (GHG) emissions are appropriately evaluated. Based on our review, we have identified flaws in the DEIR analysis used to support the significance determinations, such as unsubstantiated and incomplete calculations for evaluating air pollutant emissions during project operation. The specific concerns identified in the DEIR analysis for potential environmental impacts related to air quality and GHG emissions are described in detail below. L-41

Incomplete and Unsubstantiated Analysis of Criteria Air Pollutant and GHG Emissions from Operation of the Proposed Project

The DEIR estimated the project's criteria air pollutant and GHG emissions from warehouse operations using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. The predominant source of emissions from warehouse operations are from vehicle trips. CalEEMod estimates emissions based on the total vehicle miles travelled (VMT) for each type of vehicle trip generated by the project. The VMT and associated emissions are estimated in CalEEMod based on trip generation rates and travel distances for each vehicle type. Nitrogen oxides (NOx) and GHG emissions are considered the most common air pollutants of concern for warehouse projects due to the relatively high volume of diesel trucks generated by facility operations. L-42

Underestimated Emissions from Warehouse Vehicle Trips

Based on page 710 of the DEIR, the total daily trip generation rate for the project was calculated using the AM and PM peak hour E-commerce trip generation rates provided by Kittlesons' *Tracy Costco Depot Transportation Impact Analysis Report and Trip generation* (2017) and the daily trip generation rate to AM plus PM peak hour trip generation rate ratio from ITE 154 - High-Cube Transload & Short-Term Storage Warehouse. The total daily trip L-43

388 17th Street, Suite 230, Oakland, CA 94612 | P: (510) 420-8686 | www.baseline-env.com

BASELINE ENVIRONMENTAL CONSULTING

generation rates were then split into passenger car and truck trips based on ITE guidance for high-cube and warehousing facilities (percentage of passenger car vehicles: 67.8%). The project includes the construction and subsequent operation of two warehouse buildings that would serve as an annex (Annex) to the existing Costco Depot located approximately 1.5-miles to the west of the project and as a Direct Delivery Center (DDC). The traffic analysis used the same trip generation rate and fleet mix for these two warehouse buildings despite the difference in the proposed uses.

Based on the CalEEMod output files in Appendix B.1 of the DEIR, the DEIR Air Quality analysis used numerous CalEEMod default parameters (e.g., trip length, trip type, and trip percentage) to estimate VMT, and assumed that all passenger vehicle trips and heavy-duty truck trips would travel about 10.6 miles per trip on average. The CalEEMod's default trip lengths are countywide averages for all vehicle and land use types, which are not representative of the vehicle trips generated at a warehouse. The Air Quality analysis did not provide substantial evidence to support this approach, which has resulted in a significant underestimation of the total vehicle miles travelled (VMT) and associated criteria air pollutant and GHG emissions.

L-43 cont'd

Trip characteristics more representative of the proposed project are discussed below:

- **Trip lengths**. For passenger vehicles, the traffic analysis estimated that the project would generate 24.8 VMT per employee per day. Therefore, the one-way trip length for a worker commute trip would be 12.4 miles. For heavy-duty truck trips, based on the average distance to other nearby Costco warehouses[1] that could be supported by the proposed project, it would be reasonable to assume trucks travel an average of about 28 miles per trip for the DDC. It is assumed that the trip length for the Annex is the same as the DDC due to the lack of specific trip length information provided for the Annex.

- **Trip Percentage**. The DEIR Air Quality analysis used the CalEEMod default trip type percentages for both worker commute trips and heavy-duty truck trips: 59% of the trips were commercial-work trips (commuting) and 41% of the trips were commercial-nonwork trips (delivery). The DEIR Air Quality analysis provides no explanation or justification for not differentiating trip types based on vehicle types. Based on the proposed use of the warehouse, it would be reasonable to assume that 100% of the passenger vehicle trips will be worker commute trips and 100% of the heavy-duty truck trips will be delivery trips.

The project's daily VMT estimations were updated using the same trip generation rates from the DEIR Air Quality analysis and the suggested trip lengths and trip percentages described above. As shown in **Table 1**, the updated average daily VMT for passenger vehicles is about 17%

[1] Distances to Costco warehouses in nearby cities: Manteca (14 miles away), Modesto (26 mile), Stockton (30 miles), and Turlock (42 miles).

BASELINE ENVIRONMENTAL CONSULTING

higher than what was estimated in the DEIR. The updated average daily VMT for trucks is about 164% higher than the truck VMT estimated in the DEIR Air Quality analysis. The average daily VMT for trucks is greatly underestimated in the DEIR.

Table 1. Project Trip Generation Assumptions and VMT Estimates

Land Use	Vehicle Type	Daily Trip Rate (Trips/KSF)	Trip Length (Miles/Trip)	Daily Trips	Daily VMT Estimated by CalEEMod	Total Daily VMT Estimated by CalEEMod
DEIR[A]						
Costco Ecommerce Warehouse	Passenger	1.48	10.6	2,576	27,267	40,222
	Truck	0.70	10.6	1,224	12,956	
Updated Analysis[B]						
Costco Ecommerce Warehouse	Passenger	1.48	12.4	2,576	31,855	66,033
	Truck	0.70	28	1,224	34,178	

Notes: KSF = thousand square feet; VMT = vehicle miles travelled

[A] Trip generation rate and travel distance were derived from page 710 and page 621 of the DEIR. The traffic analysis in the DEIR used the same trip generation rate and fleet mix for the proposed two warehouse buildings. Therefore, the two warehouses' trips are combined in the analysis. The trip generation rates for passenger vehicles and trucks used in the DEIR were calculated by dividing the overall trip generation rate by the percentage of passenger vehicles and trucks reported in the DEIR. The average one-way trip lengths used in the DEIR were calculated by dividing the annual VMT by the total trips per day and 365 days per year.

[B] The one-way travel distance for passenger cars is based on the VMT per employee provided in the traffic analysis. It was assumed that 100% of the passenger vehicle trips and heavy-duty truck trips will be worker commute trips and delivery trips, respectively. The DEIR traffic analysis did not specify one-way travel distance for heavy-duty trucks. The travel distance for trucks is assumed to be 28-mile based on the use of the project. All trips are modeled as primary trips.

L-43 cont'd

Baseline has prepared an updated analysis of the NOx emissions from vehicle trips that would be generated by the proposed warehouses based on the updated VMT estimates. The same version of CalEEMod (version 2020.4.0) was used to provide an updated estimate of the project's maximum daily NOx emissions from warehouse passenger trips and truck trips. A copy of the CalEEMod report for the updated analysis is included as **Attachment A**. As shown in **Table 2**, the updated estimate of the project's annual NOx emissions from warehouse vehicle trips is about 37.0 tons per year, which is about 19.6 tons higher than the annual NOx emissions estimated in the DEIR Air Quality analysis and exceeds the San Joaquin Valley Air Pollution Control District's (SJVAPCD's) threshold of significance (10 tons per year) by about 27.0 tons. As a result, the overall NOx emissions from project operation would be about 113% higher than emissions estimated in the DEIR Air Quality analysis. Similarly, the other criteria air pollutants and GHG emissions from vehicle trips have also be underestimated in the DEIR analysis.

BASELINE ENVIRONMENTAL CONSULTING

Table 2. Annual NOx Emissions (tons per year) at the Project Site

Source	DEIR[A] (tons/year)	Baseline's Updated Analysis[B] (tons/year)
Area	<0.01	Same as DEIR
Energy Source	0.52	Same as DEIR
Mobile - Warehouse Passenger Trips	16.9	0.51
Mobile - Warehouse Truck Trips		36.5
Total Annual Emissions	17.4	37.0
SJVAPCD Threshold	**10**	**10**
Threshold Exceeded?	**Yes**	**Yes**

Notes: NOx = nitrogen oxides; tons/year =tons per year; -- = not reported; SJVAPCD = San Joaquin Valley Air Pollution Control District

[A] DEIR NOx emissions are based on page 605 of the DEIR.

[B] Mobile NOx emissions are updated based on suggested traffic inputs for warehouse operations.

L-43 cont'd

Incomplete Analysis of Emissions from Refrigeration

The project description (page 42 of the DEIR) indicates that there would be refrigeration systems in the warehouses. Additionally, the DEIR indicated that Truck Refrigeration Units (TRUs) are expected to be in use in approximately 15% of the heavy-duty trucks that travel to and from the project site for the Annex (Page 123 of the DEIR). For the Annex, the DEIR Air Quality analysis modeled emissions from an unrefrigerated warehouse. As a result, the Air quality analysis likely underestimated the operational criteria air pollutant and GHG emissions associated with energy use at a refrigerated warehouse. In addition, the air quality analysis did not include estimate criteria air pollutant and GHG emissions from the engines of TRUs during project operation. Therefore, the DEIR's analysis on operational criteria air pollutants and GHG emissions is incomplete.

L-44

Inadequate Mitigation for Significant and Unavoidable Impact

The DEIR Air Quality analysis concluded that the project would have a significant and unavoidable impact for criteria air pollutant emissions. The only mitigation measure identified was MM 3.3-1, which requires the use of trucks that have a 2010 model year or newer engines. The effectiveness of this mitigation measure was not evaluated in the Air Quality analysis "*due to the difficulty in modeling the emissions…*". This is not difficult to model and should have been provided in the DEIR analysis. It is also not clear in the DEIR if Costco would own all the trucks accessing the Costco warehouses. If some trucks are owned and operated by a 3rd party, then MM 3.3-1 does not identify how the engine year for 3rd party truck fleets would be effectively monitored and enforced.

L-45

The DEIR also discussed that the project's operational baseline NOx emissions will be reduced by 33.3% over a period of 10 years based on an Air Impact Assessment (AIA) that will need to be prepared to comply with SJVAPCD Rule 9510. While this is a regulatory requirement, it appears to be acting as deferred mitigation. The DEIR does not identify any feasible mitigation measures beyond MM 3.3-1 that could be included in the AIA to reduce the adverse effects of criteria air pollutant emissions. The DEIR also does not evaluate if it is feasible to reduce NOx emissions beyond 33.3% and potentially below the threshold of significance.

Under CEQA, a project must evaluate all feasible mitigation measures to reduce the adverse effects of a significant an unavoidable impact to the maximum extent. For example, the running NOx emissions from heavy-duty trucks that have a 2014 model year engine are about 77% lower than the running NOx emissions from heavy-duty trucks with a 2010 model year engine. The DEIR doesn't provide justification to support the use of 2010 model year engines in MM 3.3-1 when the use of 2014 or later model engine years is feasible and would provide a substantially greater reduction in criteria air pollutant emissions. The DEIR does not evaluate other potential mitigation measures, such as providing electrical hookups at loading docks to power TRUs or installing electric vehicle supply equipment and/or 'EV Ready Spaces' to service future heavy-duty vehicles. As a result, the DEIR provided an inadequate analysis of mitigation measures that can reduce the significant adverse effects of criteria air pollutant emission to the maximum extent feasible.

L-45 cont'd

Inadequate Analysis of GHG Emissions

Based on the California Supreme Court findings for *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), a project's GHG emissions should be evaluated based on its effect on California's efforts to meet the State's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its "fair share" of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223).

The DEIR analysis only evaluated the project's consistency with measures from the 2017 Scoping Plan and Regional Transportation Plan and Sustainable Communities Strategy. Demonstrating consistency with these plans does not provide evidence that an individual project would contribute its "fair share" of what will be required to achieve the State's long-term climate goals. Furthermore, these plans only address the Statewide climate goal for 2030 and do not consider California's long-term climate goal of carbon neutrality by 2045.

L-46

To determine an individual project's "fair share," the DEIR analysis should focus on the design elements that need to be incorporated into the project to support carbon neutrality by 2045. The primary sources of GHG emissions from the project warehouses would be from building

energy use and transportation; therefore, the DEIR should evaluate if the project can be designed to ensure it will be carbon neutral by 2045.

With respect to building energy use, the project could replace natural gas with electric power which will support California's transition away from fossil fuel–based energy sources and will bring the project's GHG emissions associated with building energy use down to zero as the electric supply becomes 100 percent carbon free. With respect to transportation, the project could be designed to provide sufficient electric vehicle (EV) charging infrastructure for heavy-duty trucks to support the shift to EVs. The DEIR does not evaluate the use of all-electric buildings or EV charging infrastructure for heavy-duty trucks. Therefore, the DEIR analysis of the project's impact from GHG emissions on the environment relative to meeting the State's long-term climate action goal of carbon neutrality by 2045 is inadequate.

L-46 cont'd

Attachment A

CalEEMod Outputs

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Tracy Costco Warehouse - Passenger trips

San Joaquin Valley Unified APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	1,745.06	1000sqft	40.06	1,745,060.00	0
Other Asphalt Surfaces	62.94	Acre	62.94	2,741,666.40	0

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.7	**Precipitation Freq (Days)**	45
Climate Zone	2			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total warehouse building area: 543,330 (bldg 1) +1,201,730 (bldg 2)=1,745,060 square feet.

Construction Phase - Information obtained from DEIR Appendix B.1

Trips and VMT -

Grading -

Vehicle Trips - Trip generation rate based on the daily trip generation rate and fleet mix reported in Appenix B.3 Appendix 2. Non-Res C-W Trip length was back calculated using the project generated VMT per employee provided in the traffic analysis.

Fleet Mix - Assumed passenger trips are 100% LDA, heavy-duty truck trips are 100% HHD

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	0.00
tblFleetMix	LDA	0.52	1.00

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFleetMix	LDT1	0.05	0.00
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.4230e-003	0.00
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.16	0.00
tblFleetMix	MH	3.3950e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	6.4900e-004	0.00
tblFleetMix	SBUS	1.4390e-003	0.00
tblFleetMix	UBUS	3.1300e-004	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblVehicleTrips	CNW_TTP	41.00	0.00
tblVehicleTrips	CW_TL	14.70	12.40
tblVehicleTrips	CW_TTP	59.00	100.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	1.74	1.48
tblVehicleTrips	SU_TR	1.74	1.48
tblVehicleTrips	WD_TR	1.74	1.48

2.0 Emissions Summary

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4171	1,775.4171	0.1712	0.0977	1,808.8132
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0668	1,468.0669	0.0808	0.0881	1,495.8531
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4171**	**1,775.4171**	**0.1712**	**0.0977**	**1,808.8132**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4165	1,775.4165	0.1712	0.0977	1,808.8126
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0667	1,468.0667	0.0808	0.0881	1,495.8530
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4165**	**1,775.4165**	**0.1712**	**0.0977**	**1,808.8126**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2023	3-31-2023	0.9746	0.9746
2	4-1-2023	6-30-2023	1.1386	1.1386
3	7-1-2023	9-30-2023	1.4177	1.4177
4	10-1-2023	12-31-2023	2.0382	2.0382
5	1-1-2024	3-31-2024	1.9374	1.9374
6	4-1-2024	6-30-2024	0.5283	0.5283
7	7-1-2024	9-30-2024	3.9234	3.9234
		Highest	3.9234	3.9234

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,298.0353	1,298.0353	0.1297	0.0247	1,308.6476
Mobile	0.4699	0.5134	8.5648	0.0310	4.2982	0.0182	4.3164	1.1417	0.0168	1.1585	0.0000	2,931.3599	2,931.3599	0.0578	0.0867	2,952.6894
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.7914	1.0311	9.0162	0.0341	4.2982	0.0576	4.3558	1.1417	0.0562	1.1979	461.0045	4,431.4608	4,892.4653	33.0482	0.4059	5,839.6120

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,296.0353	1,296.0353	0.1297	0.0247	1,308.6476
Mobile	0.4699	0.5134	8.5648	0.0310	4.2982	0.0182	4.3164	1.1417	0.0168	1.1585	0.0000	2,931.3599	2,931.3599	0.0578	0.0867	2,952.6894
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.7914	1.0311	9.0162	0.0341	4.2982	0.0576	4.3558	1.1417	0.0562	1.1979	461.0045	4,431.4608	4,892.4653	33.0482	0.4059	5,839.6120

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2023	5/5/2023	5	120	
2	Grading	Grading	5/8/2023	9/8/2023	5	310	
3	Building Construction	Building Construction	9/9/2023	4/5/2024	5	3100	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	Paving	Paving	4/8/2024	6/28/2024	5	220	
5	Architectural Coating	Architectural Coating	6/29/2024	12/13/2024	5	220	

Acres of Grading (Site Preparation Phase): 180

Acres of Grading (Grading Phase): 930

Acres of Paving: 62.94

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 2,617,590; Non-Residential Outdoor: 872,530; Striped Parking Area: 164,500 (Architectural Coating – sqft)

OffRoad Equipment

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

Trips and VMT

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	1,884.00	735.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	377.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5281	150.5281	0.0487	0.0000	151.7452
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5281**	**150.5281**	**0.0487**	**0.0000**	**151.7452**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5280	150.5280	0.0487	0.0000	151.7451
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5280**	**150.5280**	**0.0487**	**0.0000**	**151.7451**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4084	245.4084	0.0794	0.0000	247.3927
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4084**	**245.4084**	**0.0794**	**0.0000**	**247.3927**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0497
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0497**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4082	245.4082	0.0794	0.0000	247.3924
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4082**	**245.4082**	**0.0794**	**0.0000**	**247.3924**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0487
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0487**

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7219	92.7219	0.0221	0.0000	93.2733
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7219**	**92.7219**	**0.0221**	**0.0000**	**93.2733**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2800e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7218	92.7218	0.0221	0.0000	93.2732
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7218**	**92.7218**	**0.0221**	**0.0000**	**93.2732**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2900e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1472	81.1472	0.0192	0.0000	81.6269
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1472**	**81.1472**	**0.0192**	**0.0000**	**81.6269**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1471	81.1471	0.0192	0.0000	81.6268
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1471**	**81.1471**	**0.0192**	**0.0000**	**81.6268**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0796	60.0796	0.0194	0.0000	60.5654
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0796**	**60.0796**	**0.0194**	**0.0000**	**60.5654**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0795	60.0795	0.0194	0.0000	60.5653
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0795**	**60.0795**	**0.0194**	**0.0000**	**60.5653**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4699	0.5134	6.5649	0.0310	4.2992	0.0182	4.3164	1.1417	0.0169	1.1585	0.0000	2,931.359 9	2,931.359 9	0.0578	0.0867	2,952.669 4
Unmitigated	0.4699	0.5134	6.5649	0.0310	4.2992	0.0182	4.3164	1.1417	0.0169	1.1585	0.0000	2,931.359 9	2,931.359 9	0.0578	0.0867	2,952.669 4

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	2,576.01	2,576.01	2576.01	11,627,087	11,627,087
Total	2,576.01	2,576.01	2,576.01	11,627,087	11,627,087

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	12.40	6.60	6.60	100.00	0.00	0.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.517111	0.052324	0.170960	0.155671	0.027786	0.007423	0.013424	0.026160	0.000649	0.000313	0.023324	0.001439	0.003395
Unrefrigerated Warehouse-No Rail	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
NaturalGas Mitigated	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
NaturalGas Unmitigated	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

6.0 Area Detail

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Unmitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2704					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.5300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2794					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.6300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	**8.2645**	**1.5000e-004**	**0.0166**	**0.0000**		**6.0000e-005**	**6.0000e-005**		**6.0000e-005**	**6.0000e-005**	**0.0000**	**0.0323**	**0.0323**	**9.0000e-005**	**0.0000**	**0.0344**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	330.0596	13.1822	0.3145	753.3210
Unmitigated	330.0596	13.1822	0.3145	753.3210

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	332.9783	19.6785	0.0000	824.9395
Unmitigated	332.9783	19.6785	0.0000	824.9395

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

9.0 Operational Offroad

Tracy Costco Warehouse - Passenger trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Tracy Costco Warehouse - Heavy-duty Truck trips

San Joaquin Valley Unified APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unrefrigerated Warehouse-No Rail	1,745.06	1000sqft	40.06	1,745,060.00	0
Other Asphalt Surfaces	62.94	Acre	62.94	2,741,666.40	0

1.2 Other Project Characteristics

Urbanization	Rural	**Wind Speed (m/s)**	2.7	**Precipitation Freq (Days)**	45
Climate Zone	2			**Operational Year**	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total warehouse building area: 543,330 (bldg 1) +1,201,730 (bldg 2)=1,745,060 square feet.

Construction Phase - Information obtained from DEIR Appendix B.1

Trips and VMT -

Grading -

Vehicle Trips - Trip generation rate based on the daily trip generation rate and fleet mix reported in Appenix B.3 Appendix 2. Assumed 30 miles per truck trip.

Fleet Mix - Assumed passenger trips are 100% LDA, heavy-duty truck trips are 100% HHD

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.03	1.00
tblFleetMix	LDA	0.52	0.00

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

tblFleetMix	LDT1	0.05	0.00
tblFleetMix	LDT2	0.17	0.00
tblFleetMix	LHD1	0.03	0.00
tblFleetMix	LHD2	7.4230e-003	0.00
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.16	0.00
tblFleetMix	MH	3.3950e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	6.4900e-004	0.00
tblFleetMix	SBUS	1.4390e-003	0.00
tblFleetMix	UBUS	3.1300e-004	0.00
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblVehicleTrips	CNW_TL	6.60	26.00
tblVehicleTrips	CNW_TTP	41.00	100.00
tblVehicleTrips	CW_TTP	59.00	0.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	1.74	0.70
tblVehicleTrips	SU_TR	1.74	0.70
tblVehicleTrips	WD_TR	1.74	0.70

2.0 Emissions Summary

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4171	1,775.4171	0.1712	0.0977	1,808.8132
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0668	1,468.0669	0.0808	0.0881	1,495.8531
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4171**	**1,775.4171**	**0.1712**	**0.0977**	**1,808.8132**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2023	0.6797	4.8063	5.8723	0.0193	2.4331	0.1616	2.5947	0.9246	0.1495	1.0741	0.0000	1,775.4165	1,775.4165	0.1712	0.0977	1,808.8126
2024	7.4082	2.1208	4.3719	0.0157	1.2608	0.0512	1.3120	0.3386	0.0481	0.3867	0.0000	1,468.0667	1,468.0667	0.0808	0.0881	1,495.8530
Maximum	**7.4082**	**4.8063**	**5.8723**	**0.0193**	**2.4331**	**0.1616**	**2.5947**	**0.9246**	**0.1495**	**1.0741**	**0.0000**	**1,775.4165**	**1,775.4165**	**0.1712**	**0.0977**	**1,808.8126**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2023	3-31-2023	0.9746	0.9746
2	4-1-2023	6-30-2023	1.1386	1.1386
3	7-1-2023	9-30-2023	1.4177	1.4177
4	10-1-2023	12-31-2023	2.0382	2.0382
5	1-1-2024	3-31-2024	1.9374	1.9374
6	4-1-2024	6-30-2024	0.5283	0.5283
7	7-1-2024	9-30-2024	3.9234	3.9234
		Highest	3.9234	3.9234

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,298.0353	1,298.0353	0.1297	0.0247	1,308.6476
Mobile	0.5534	38.4804	6.6821	0.1722	5.3332	0.3703	5.7035	1.4659	0.3543	1.8202	0.0000	16,557.4948	16,557.4948	0.0652	2.6036	17,334.9781
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.8748	37.0081	7.1334	0.1753	5.3332	0.4097	5.7429	1.4659	0.3937	1.8598	461.0045	19,057.5957	18,518.8003	33.0555	2.9427	20,221.9207

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	9.2945	1.5000e-004	0.0168	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Energy	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	1,298.0353	1,298.0353	0.1297	0.0247	1,308.6476
Mobile	0.6534	38.4804	6.6821	0.1722	5.3333	0.3703	5.7035	1.4659	0.3543	1.8202	0.0000	16,557.4948	16,557.4948	0.0652	2.6036	17,334.9781
Waste						0.0000	0.0000		0.0000	0.0000	332.9783	0.0000	332.9783	19.6785	0.0000	824.9365
Water						0.0000	0.0000		0.0000	0.0000	128.0263	202.0333	330.0596	13.1822	0.3145	753.3210
Total	9.8748	37.0081	7.1334	0.1753	5.3332	0.4097	5.7429	1.4659	0.3937	1.8598	461.0045	19,057.5957	18,518.8003	33.0555	2.9427	20,221.9207

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2023	5/5/2023	5	120	
2	Grading	Grading	5/8/2023	9/8/2023	5	310	
3	Building Construction	Building Construction	9/9/2023	4/5/2024	5	3100	

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

4	Paving	Paving	4/8/2024	6/28/2024	5	220	
5	Architectural Coating	Architectural Coating	6/29/2024	12/13/2024	5	220	

Acres of Grading (Site Preparation Phase): 180

Acres of Grading (Grading Phase): 930

Acres of Paving: 62.94

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 2,617,590; Non-Residential Outdoor: 872,530; Striped Parking Area: 164,500 (Architectural Coating – sqft)

OffRoad Equipment

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

Trips and VMT

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	1,884.00	735.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	377.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5281	150.5281	0.0487	0.0000	151.7452
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5281**	**150.5281**	**0.0487**	**0.0000**	**151.7452**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.8846	0.0000	0.8846	0.4546	0.0000	0.4546	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1197	1.2386	0.8210	1.7100e-003		0.0570	0.0570		0.0524	0.0524	0.0000	150.5280	150.5280	0.0487	0.0000	151.7451
Total	**0.1197**	**1.2386**	**0.8210**	**1.7100e-003**	**0.8846**	**0.0570**	**0.9415**	**0.4546**	**0.0524**	**0.5070**	**0.0000**	**150.5280**	**150.5280**	**0.0487**	**0.0000**	**151.7451**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.2 Site Preparation - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.3300e-003	2.4100e-003	0.0289	9.0000e-005	0.0101	5.0000e-005	0.0101	2.6800e-003	5.0000e-005	2.7200e-003	0.0000	8.0767	8.0767	2.0000e-004	2.1000e-004	8.1447
Total	**3.3300e-003**	**2.4100e-003**	**0.0289**	**9.0000e-005**	**0.0101**	**5.0000e-005**	**0.0101**	**2.6800e-003**	**5.0000e-005**	**2.7200e-003**	**0.0000**	**8.0767**	**8.0767**	**2.0000e-004**	**2.1000e-004**	**8.1447**

3.3 Grading - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4084	245.4084	0.0794	0.0000	247.3927
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4084**	**245.4084**	**0.0794**	**0.0000**	**247.3927**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0497
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0497**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.4142	0.0000	0.4142	0.1644	0.0000	0.1644	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1495	1.5532	1.2623	2.7900e-003		0.0641	0.0641		0.0590	0.0590	0.0000	245.4082	245.4082	0.0794	0.0000	247.3924
Total	**0.1495**	**1.5532**	**1.2623**	**2.7900e-003**	**0.4142**	**0.0641**	**0.4783**	**0.1644**	**0.0590**	**0.2234**	**0.0000**	**245.4082**	**245.4082**	**0.0794**	**0.0000**	**247.3924**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.3 Grading - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-003	2.6800e-003	0.0321	1.0000e-004	0.0112	6.0000e-005	0.0112	2.8700e-003	5.0000e-005	3.0300e-003	0.0000	8.9742	8.9742	2.2000e-004	2.3000e-004	9.0487
Total	**3.7000e-003**	**2.6800e-003**	**0.0321**	**1.0000e-004**	**0.0112**	**6.0000e-005**	**0.0112**	**2.8700e-003**	**5.0000e-005**	**3.0300e-003**	**0.0000**	**8.9742**	**8.9742**	**2.2000e-004**	**2.3000e-004**	**9.0487**

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7219	92.7219	0.0221	0.0000	93.2733
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7219**	**92.7219**	**0.0221**	**0.0000**	**93.2733**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2800e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0629	0.5754	0.6498	1.0800e-003		0.0280	0.0280		0.0263	0.0263	0.0000	92.7218	92.7218	0.0221	0.0000	93.2732
Total	**0.0629**	**0.5754**	**0.6498**	**1.0800e-003**		**0.0280**	**0.0280**		**0.0263**	**0.0263**	**0.0000**	**92.7218**	**92.7218**	**0.0221**	**0.0000**	**93.2732**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0312	1.2096	0.3874	5.4100e-003	0.1763	7.6200e-003	0.1840	0.0510	7.2900e-003	0.0582	0.0000	518.2721	518.2721	2.2900e-003	0.0776	541.4486
Worker	0.3094	0.2246	2.6908	8.0900e-003	0.9368	4.7600e-003	0.9415	0.2489	4.3800e-003	0.2533	0.0000	751.4356	751.4356	0.0184	0.0197	757.7590
Total	**0.3406**	**1.4341**	**3.0782**	**0.0135**	**1.1131**	**0.0124**	**1.1255**	**0.2999**	**0.0117**	**0.3116**	**0.0000**	**1,269.707 8**	**1,269.707 8**	**0.0207**	**0.0973**	**1,299.207 6**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1472	81.1472	0.0192	0.0000	81.6269
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1472**	**81.1472**	**0.0192**	**0.0000**	**81.6269**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0515	0.4705	0.5658	9.4000e-004		0.0215	0.0215		0.0202	0.0202	0.0000	81.1471	81.1471	0.0192	0.0000	81.6268
Total	**0.0515**	**0.4705**	**0.5658**	**9.4000e-004**		**0.0215**	**0.0215**		**0.0202**	**0.0202**	**0.0000**	**81.1471**	**81.1471**	**0.0192**	**0.0000**	**81.6268**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.4 Building Construction - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0266	1.0589	0.3309	4.6600e-003	0.1543	6.7200e-003	0.1610	0.0446	6.4300e-003	0.0510	0.0000	446.2302	446.2302	1.9100e-003	0.0668	466.1736
Worker	0.2500	0.1723	2.1689	6.6500e-003	0.8197	3.9500e-003	0.8236	0.2176	3.6400e-003	0.2215	0.0000	641.0207	641.0207	0.0144	0.0158	646.0995
Total	**0.2766**	**1.2312**	**2.4999**	**0.0115**	**0.9740**	**0.0107**	**0.9847**	**0.2624**	**0.0101**	**0.2725**	**0.0000**	**1,087.250 9**	**1,087.250 9**	**0.0163**	**0.0826**	**1,112.273 1**

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0796	60.0796	0.0194	0.0000	60.5654
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0796**	**60.0796**	**0.0194**	**0.0000**	**60.5654**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0296	0.2857	0.4388	6.8000e-004		0.0141	0.0141		0.0129	0.0129	0.0000	60.0795	60.0795	0.0194	0.0000	60.5653
Paving	0.0225					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0521**	**0.2857**	**0.4388**	**6.8000e-004**		**0.0141**	**0.0141**		**0.0129**	**0.0129**	**0.0000**	**60.0795**	**60.0795**	**0.0194**	**0.0000**	**60.5653**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.5 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7100e-003	1.1800e-003	0.0148	5.0000e-005	5.5900e-003	3.0000e-005	5.6200e-003	1.4900e-003	2.0000e-005	1.5100e-003	0.0000	4.3746	4.3746	1.0000e-004	1.1000e-004	4.4092
Total	**1.7100e-003**	**1.1800e-003**	**0.0148**	**5.0000e-005**	**5.5900e-003**	**3.0000e-005**	**5.6200e-003**	**1.4900e-003**	**2.0000e-005**	**1.5100e-003**	**0.0000**	**4.3746**	**4.3745**	**1.0000e-004**	**1.1000e-004**	**4.4092**

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	8.9297					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0108	0.0731	0.1086	1.9000e-004		3.6500e-003	3.6500e-003		3.6500e-003	3.6500e-003	0.0000	15.3195	15.3195	8.6000e-004	0.0000	15.3411
Total	**8.9405**	**0.0731**	**0.1086**	**1.9000e-004**		**3.6500e-003**	**3.6500e-003**		**3.6500e-003**	**3.6500e-003**	**0.0000**	**15.3195**	**15.3195**	**8.6000e-004**	**0.0000**	**15.3411**

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

3.6 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SOC	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0858	0.0591	0.7440	2.3500e-003	0.2812	1.3600e-003	0.2825	0.0747	1.2500e-003	0.0760	0.0000	219.8952	219.8952	4.9400e-003	5.4300e-003	221.6374
Total	**0.0858**	**0.0591**	**0.7440**	**2.3500e-003**	**0.2812**	**1.3600e-003**	**0.2825**	**0.0747**	**1.2500e-003**	**0.0760**	**0.0000**	**219.8952**	**219.8952**	**4.9400e-003**	**5.4300e-003**	**221.6374**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.5534	36.4804	6.6821	0.1722	5.3332	0.3703	5.7035	1.4859	0.3543	1.8202	0.0000	16,557.49 48	16,557.49 48	0.0652	2.6035	17,334.87 81
Unmitigated	0.5534	36.4804	6.6821	0.1722	5.3332	0.3703	5.7035	1.4869	0.3543	1.8202	0.0000	16,557.48 48	16,557.49 48	0.0652	2.6035	17,334.87 81

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	1,224.01	1,224.01	1,224.01	12,475,065	12,475,065
Total	1,224.01	1,224.01	1,224.01	12,475,065	12,475,065

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	14.70	6.60	6.60	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	14.70	6.60	28.00	0.00	0.00	100.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.517111	0.052324	0.170960	0.155671	0.027786	0.007423	0.013424	0.026160	0.000649	0.000313	0.023324	0.001439	0.003395
Unrefrigerated Warehouse-No Rail	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	734.6409	734.6409	0.1169	0.0144	741.9052
NaturalGas Mitigated	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
NaturalGas Unmitigated	0.0589	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1.05576e+007	0.0569	0.5175	0.4347	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.3944	563.3944	0.0108	0.0103	566.7424
Total		**0.0569**	**0.5175**	**0.4347**	**3.1100e-003**		**0.0393**	**0.0393**		**0.0393**	**0.0393**	**0.0000**	**563.3944**	**563.3944**	**0.0108**	**0.0103**	**566.7424**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	7.94002e+006	734.6409	0.1189	0.0144	741.9052
Total		734.6409	0.1189	0.0144	741.9052

6.0 Area Detail

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Unmitigated	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2704					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.5300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	8.2645	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	1.2794					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	6.9926					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.6300e-003	1.5000e-004	0.0166	0.0000		6.0000e-005	6.0000e-005		6.0000e-005	6.0000e-005	0.0000	0.0323	0.0323	9.0000e-005	0.0000	0.0344
Total	**8.2645**	**1.5000e-004**	**0.0166**	**0.0000**		**6.0000e-005**	**6.0000e-005**		**6.0000e-005**	**6.0000e-005**	**0.0000**	**0.0323**	**0.0323**	**9.0000e-005**	**0.0000**	**0.0344**

7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	330.0596	13.1822	0.3145	753.3210
Unmitigated	330.0596	13.1822	0.3145	753.3210

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	403.545 / 0	330.0596	13.1822	0.3145	753.3210
Total		**330.0596**	**13.1822**	**0.3145**	**753.3210**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	332.9783	19.6785	0.0000	824.9395
Unmitigated	332.9783	19.6785	0.0000	824.9395

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	1640.36	332.9783	19.6785	0.0000	824.9395
Total		332.9783	19.6785	0.0000	824.9395

9.0 Operational Offroad

Tracy Costco Warehouse - Heavy-duty Truck trips - San Joaquin Valley Unified APCD Air District, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Attachment C:State Attorney General's Best Practices and
Mitigation Measures to Comply with the
California Environmental Quality Act

I

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

Table of Contents

I. Background 1
II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies 3
III. Community Engagement 4
IV. Warehouse Siting and Design Considerations 5
V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation 7
VI. Noise Impacts Analysis and Mitigation 10
VII. Traffic Impacts Analysis and Mitigation 11
VIII. Other Significant Environmental Impacts Analysis and Mitigation 12
IX. Conclusion 13

Updated September 2022

In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.[3] It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[4] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California. L-47

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[5] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.[6] The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.[7] Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.[8] This trend has only accelerated, with e-commerce growing to

[1] https://oag.ca.gov/environment/justice.
[2] https://oag.ca.gov/environment/ceqa; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).
[3] This September 2022 version revises and replaces the prior March 2021 version of this document.
[4] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.
[5] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.
[6] Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/ (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).
[7] U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm (last accessed September 18, 2022).
[8] South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.[9] The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.[10]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_X)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[11] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[12] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents. L-47 cont'd

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California's environmental justice screening tool, which measures overall pollution and demographic vulnerability.[13] That

[9] U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), *available at* https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report (last accessed September 18, 2022).

[10] CBRE Research, *supra note* 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[11] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (last accessed September 18, 2022) (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (last accessed September 18, 2022) (DPM).

[12] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[13] South Coast Air Quality Management District, "Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305" (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.[14] Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.[15]

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

L-47 cont'd

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors[16] can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

[14] *Id.* at 5-7.

[15] Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported "riskiness" of loaning to their residents. In California cities where such "redlining" maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded "red," signifying the least desirable areas where investment was to be avoided. *See* University of Richmond Digital Scholarship Lab, Mapping Inequality, https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca (Los Angeles), https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca (San Diego), https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca (Oakland), https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca (Stockton), https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca (Fresno) (all last accessed September 18, 2022).

[16] In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[17]

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.[18] Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.[19]

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

L-47 cont'd

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

[17] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.
[18] https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf (last accessed September 18, 2022).
[19] For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (last accessed September 18, 2022) (Riverside County); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

L-47 cont'd

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[20]
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

L-47 cont'd

[20] CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), *available at* https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

Updated September 2022

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.[21]
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

L-47 cont'd

[21] CEQA Guidelines § 15369.

7

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

L-47 cont'd

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage[22] to or from the project site to be zero-emission beginning in 2030.

[22] "Drayage" refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

L-47 cont'd

trucks.

- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

L-47 cont'd

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

L-47 cont'd

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

L-47 cont'd

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

Attachment D:
Conditions of Approval for CenterPoint Properties
(May 22, 2022)

CONDITIONS OF APPROVAL FOR CENTERPOINT PROPERTIES (Applicant/Owner): COUNTY FILE #'s CDDP18-03007 and CDMS19-00009,

Project Approval:

1. Development is APPROVED as generally described in the application materials received by the Department of Conservation and Development/Community Development Division (CDD) on August 28, 2018, (including Tentative Map submitted October 29, 2019), and subject to the conditions below.

Compliance Review:

2. At least 30 days prior to issuance of a building permit, the applicant shall provide a permit compliance report to CDD for review and approval. The report shall identify all conditions of approval that are administered by CDD. The report shall document the measures taken by the applicant to satisfy all relevant conditions. Copies of the permit conditions may be obtained from CDD. Unless otherwise indicated, the applicant will be required to demonstrate compliance with the conditions of this permit prior to requesting County issued permits. L-48

   The permit compliance review is subject to staff time and materials charges, with an initial deposit of $1,000 which shall be paid at the time of submittal of the compliance report.

3. At least 30-days prior to occupancy, any proposed tenant shall submit a Property Use Verification (PUV) application to CDD staff in order to verify consistency with this permit. The PUV will be necessary to obtain any required business licenses from the County Tax Collector's Office.

General Provisions:

4. Any deviation from or expansion beyond the limits of this permit approved under this application may require the filing of a request for modification of the Development Plan Permit.

5. A publicly visible sign shall be posted on the property with the telephone number and person to contact regarding construction-related complaints. This person shall respond and take corrective action within 24 hours. The CDD phone number to call in complaints shall also be visible to ensure compliance with applicable regulations.

6. Applicant shall make best efforts to hire employees, workers, and subcontractor components for jobs from the Richmond/North Richmond community.

7. At least 30 days prior to submittal of a building permit for signage, a detailed sign program shall be submitted for the review and approval of CDD.

8. The applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $125,000 as its fair share contribution towards the cost of a General Plan/Zoning Ordinance update for the North Richmond area.

Aesthetics:

9. At least 30 days prior to applying for a building permit, the applicant shall submit for review and approval by the Contra Costa County Department of Conservation and Development staff a Final Lighting Plan. Light standards shall be low-lying and exterior lights on the buildings shall be deflected so that lights shine onto the applicant's property. **(Mitigation Measure (MM) AES – 1)** L-48 cont'd

Air Quality:

10. The project applicant shall ensure, at minimum, the use of equipment that meets the United States Environmental Protection Agency's (EPA) Tier 4 Interim emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower for all site preparation, grading, and building construction activities, unless it can be demonstrated, to the Contra Costa County Department of Conservation and Development's satisfaction, that such equipment is not available. Any emission control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 4 Interim emissions standards for a similarly sized engine, as defined by the California Air Resources Board (ARB) regulations.

    Prior to the issuance of building or grading permits, the project applicant shall ensure that all construction (e.g., demolition and grading) plans clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment over 50 horsepower for the specific activities stated above.

    During construction, the project applicant shall ensure that a list of all operating equipment in use on the construction site is maintained on-site for verification by the Contra Costa County Department of Conservation and Development. The construction equipment list shall state the makes, models, Equipment Identification Numbers, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the

manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. **(MM AIR-2a)**

11. The project's construction contractor shall comply with the following Bay Area Air Quality Management District (BAAQMD) Best Management Practices (BMPs) for reducing construction emissions of PM_{10} and $PM_{2.5}$:

    - Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour (mph). Reclaimed water should be used whenever possible.
    - To control dust, pave, apply water twice daily or as often as necessary, or apply (nontoxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
    - Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
    - Sweep daily with water sweepers (using reclaimed water if possible) or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
    - Sweep public streets daily (with water sweepers using reclaimed water if possible) or as often as needed in the vicinity of the project site to keep streets free of visible soil material.
    - Hydroseed or apply nontoxic soil stabilizers to inactive construction areas.
    - Enclose, cover, water twice daily, or apply nontoxic soil binders to exposed stockpiles (e.g., dirt, sand, etc.).
    - Limit vehicle traffic speeds on unpaved roads to 15 mph.
    - Replant vegetation in disturbed areas as quickly as possible.
    - Install sandbags or other erosion control measures to prevent silt runoff from public roadways. **(MM AIR-2b)**

L-48 cont'd

12. Prior to issuance of the certificate of occupancy, Contra Costa County shall require future tenants proposing operations that have potential to emit nuisance odors to prepare an odor management plan that identifies project design features, measures, and control technologies to ensure compliance with Bay Area Air Quality Management District (BAAQMD) Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. Facilities that have the potential to generate nuisance odors include, but are not limited to:

    - Composting, green waste, or recycling facilities
    - Fiberglass manufacturing facilities
    - Painting/coating operations
    - Large-capacity coffee roasters
    - Laboratory operations
    - Food-processing facilities

    The odor management plan for the proposed facility shall be submitted to the County prior to the issuance of the certificate of occupancy. During operation of the proposed facility, the County shall conduct periodic evaluation of on-site odors per the schedule and reporting requirements outlined in the odor management plan. **(MM AIR-4)**

L-48 cont'd

Zero Emission Vehicle Requirements:

13. The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all on-going operational responsibilities.

    a. The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later.

    "Domiciled at the project site shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission heavy-duty trucks which require service can be temporarily replaced with model year 2014 or later trucks. Replacement trucks shall be used for only the minimum time required for servicing fleet trucks.

b. The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2027.

"Domiciled at the project site" shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission vehicles which require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles.

L-48 cont'd

The property owner/tenant/lessee shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the project site.

c. The property owner/tenant/lessee shall make all reasonable efforts to procure the zero emission vehicles/trucks required to meet the "clean fleet" requirements in (a) and (b) above. In the event that there is a disruption in the manufacturing of zero emission vehicles/trucks or that sufficient vehicles/trucks are not commercially available for the intended application, the "clean fleet requirements" may be adjusted as minimally as possible by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks. The property owner/tenant/lessee shall provide all necessary documentation describing efforts made to meet clean fleet requirements as part of any adjustment request. The CDD staff may seek the recommendation of the California Air Resources Board in determining whether there has been a manufacturing disruption or insufficient vehicles/trucks commercially available for the intended application.

d. The property owner/tenant/lessee shall ensure all on-site equipment and vehicles (e.g., yard hostlers, yard equipment, forklifts, yard trucks and tractors, and pallet jacks) used within the project site are zero-emission from start of operations.

e. The property owner/tenant/lessee shall use the cleanest technologies available and provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on-site.

f. At least 30 days prior to applying for building permits, the property owner/tenant/lessee shall submit plans for review and approval of CDD staff, which include the necessary infrastructure for future use of zero emission vehicles, including both heavy-duty and delivery trucks (e.g., installation of conduit specifically designated for truck charging equipment in the future).

g. Idling is strictly prohibited on the subject property and adjacent streets in the Richmond/San Pablo area. The property owner/tenant/lessee shall inform all truck drivers associated with the business of this prohibition.

L-48 cont'd

h. Applicant/tenant/lessee shall periodically sweep the property to remove road dust, tire wear, brake dust and other contaminants in parking lots.

i. Applicant/tenant/lessee shall not use diesel back-up generators on the property unless absolutely necessary. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Applicant/tenant/lessee shall make every effort to utilize emergency back-up generators that meet CARB's Tier 4 emission standards or have the least emissions.

j. The property owner/tenant/lessee shall monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.

k. The operation of Transportation Refrigeration Units (TRUs) is prohibited on the subject site. Any proposed use of TRUs at the subject location will require submittal of a Development Plan modification application.

l. The property owner shall add this Condition of Approval, Air Quality 15, a through l, as part of contractual lease agreement language to ensure the tenant/lessee is informed of all on-going operational responsibilities.

14. Within 30-days of occupancy, applicant/tenant shall demonstrate to the satisfaction of CDD staff, that the required zero emission vehicle requirements are being met.

Solar Power Generation:

15. At least 30-days prior to applying for a building permit, the applicant shall submit evidence to the CDD staff for review and approval, demonstrating that the subject building(s) have been designed to be solar ready by meeting or exceeding the current California Building Code (e.g., structurally able to support solar panels on roofs, appropriately sized electrical panels and conduit, etc.).

16. The project sponsor shall include with the building permit application, sufficient solar panels to provide power for the operation's base power use at the start of operations and as power use demand increases. Project sponsor shall include analysis of (a) projected power requirements at the start of operations and as power demand increases corresponding to the implementation of the "clean fleet" requirements, and (b) generating capacity of the solar installation. L-48 cont'd

    CDD shall verify the size and scope of the solar project based upon the analysis of the projected power requirements and generating capacity as well as the available solar panel installation space.

    In the event sufficient space is not available on the subject lot to accommodate the needed number of solar panels to produce the operation's base or anticipated power use, the applicant shall demonstrate how all available space has been maximized (e.g., roof, parking areas, etc.). Areas which provide truck movement may be excluded from these calculations unless otherwise deemed acceptable by the supplied reports.

    In the event utility provider review/approval delays do not allow installation/operation of the CDD approved solar panels at the time of final building inspection (occupancy), the project sponsor shall provide documentation to the CDD for review and approval, demonstrating how all reasonable and normal efforts have been made to procure the necessary permits and install the solar panels.

17. Prior to issuance of the initial building permit, the applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $500,000 as its fair share contribution

towards the cost of planning and/or constructing a Solar Project for the benefit of the North Richmond area. The Solar Project must benefit North Richmond residents as mitigation for the construction of a warehouse project with its associated emissions and truck traffic. The County will work with the District One Supervisor and the North Richmond Community to define and develop the Solar Project.

Biological Resources:

Nesting Bird Surveys

18. Construction work shall take place outside of the February 15 to September 15 bird nesting seasonal window to the maximum extent practicable. If construction is to be conducted during the nesting season, the project applicant is responsible for ensuring that the project does not result in any violation of the Migratory Bird Treaty Act (MBTA) or Fish and Game Code. A qualified Biologist shall conduct focused pre-construction nesting bird surveys throughout the project area no more than 5 days prior to the initiation of on-site project-related activities. Surveys shall be conducted in all potential habitat located at, and adjacent to, project work sites and in staging and storage areas. The minimum survey radii surrounding the work area will be the following: (1) 250 feet for passerines; and (2) 1,000 feet for raptors such as *Buteo spp.* In the event that there is a lapse in construction activities for 7 days or more, a qualified Biologist shall conduct additional focused pre-construction nesting bird surveys in areas of potential habitat again before project activities can be reinitiated. If an active nest is found, the qualified Biologist may consult with the California Department of Fish and Wildlife (CDFW) if needed regarding appropriate action to comply with the Fish and Game Code.

L-48 cont'd

- **Active Nest Buffers**. Active nest sites and protective buffer zones will be designated as "ecologically sensitive areas" where no project-related activities or personnel may enter (while occupied or in use for the season in the case of multi clutch bearing species) during the course of nesting bird season with the establishment of a fence barrier or flagging surrounding the nest site. The qualified Biologist shall determine the necessary buffer, in consultation with CDFW if needed, to protect nesting birds based on existing site conditions, such as construction activity, topography, and line of sight, and shall increase buffers as needed to provide sufficient protection of nesting birds and their natural behaviors.

- **Active Nests**. A qualified Biologist will observe any identified active nests prior to the start of any project-related activities to establish a behavioral

baseline of the adults and any nestlings. Once project activities commence, all active nests shall be continuously monitored by a qualified Biologist to detect any signs of disturbance and behavioral changes as a result of the project. In addition to direct impacts, such as nest destruction, nesting birds might be affected by noise, vibration, odors and movement of workers or equipment. If signs of disturbance and behavioral changes are observed, the qualified Biologist shall halt project activities causing that change until the nestlings have fledged, and the nest is determined to be inactive. **(MM BIO-1a)**

19. General Minimization Measures
    - **Harassment of Animals**. No project personnel or motorized equipment shall harass, herd, or drive any wildlife. Harass is defined as an intentional act that disrupts an animal's normal behavior patterns, including but is not limited to, breeding, feeding, or sheltering. Project personnel and equipment shall not cause displacement of wildlife into roadways or open areas lacking cover from predators.
    - **Allow Wildlife to Leave Unharmed**. Project staff shall allow any wildlife encountered during the course of project activities to leave the project area unharmed.
    - **Temporary Flagging, Fencing, and Barriers**. The permittee shall remove all temporary flagging, fencing, and/or barriers from the project area upon completion of project activities.
    - **Open Pipes Restriction**. All pipes, culverts, signposts, poles, or similar structures that are staged, stored, or installed at the project area for one or more overnight periods shall be thoroughly inspected for wildlife prior to use in project activities.
    - **Open Trenches**. Wildlife escape ramps shall be installed, constructed of wood, or installed as an earthen slope in each open trench, hole, or pit that is capable of allowing large (e.g., deer, coyote) and/or small (e.g., frogs, snakes) wildlife to escape on their own volition. Open trenches, pits, or holes shall be inspected for wildlife prior to the initiation of project activities each day. If wildlife is discovered, it shall be allowed to leave on its own volition, or if necessary, moved by biological staff if applicable. Special-status species shall not be handled without prior consultation from CDFW.

L-48 cont'd

- **Signpost Restriction**. Signposts installed permanently throughout the course of the project shall have the top capped and/or the top three post holes covered or filled with screws or bolts to prevent the entrapment of wildlife.
- **Fencing Restriction**. All fencing installed temporarily or permanently throughout the course of the project, shall not be constructed of materials deleterious to wildlife (e.g., sharp edges exposed at the top or bottom of chain-link fencing, braided wire where birds may become entangled, etc.). No barbed wire, or equivalent, shall be allowed where it may result in harm to birds and other wildlife.
- **Restriction of Nighttime Construction and Artificial Lighting**. Except for construction activities that involve the pouring of concrete and require the use of nighttime lighting, all other project activities shall be terminated 30 minutes before sunset and shall not resume until 30 minutes after sunrise. The permittee shall use sunrise and sunset times established by the Federal Aviation Administration (FAA) found at: https://avcams.faa.gov/sunrise_sunset.php. L-48 cont'd

No permanent or unattended temporary outdoor lighting shall be used during the course of construction.

Cultural Resources and Tribal Cultural Resources:

20. Worker Training, Archaeological Monitoring, and Halt Construction Upon Encountering Historical or Archaeological Materials

Prior to the initiation of construction activities, an Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology shall provide Worker Environmental Awareness Program (WEAP) training to construction personnel with an overview of applicable laws, project mitigation measures, and procedures to be followed with regards to historical and/or archaeological resources that may be encountered over the course of the project. An Archaeologist should be present to monitor all ground-disturbance activities. In the event a potentially significant historical and/or archaeological resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until an Archaeologist has evaluated the situation. The applicant for the proposed project (CenterPoint Properties) shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Potentially significant cultural resources consist

of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. The Archaeologist shall make recommendations concerning appropriate measures that shall be implemented to protect the resource, including but not limited to excavation and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Any previously undiscovered resources found during construction within the project site shall be recorded on appropriate California Department of Parks and Recreation (DPR) 523 forms and shall be submitted to Contra Costa County Department of Conservation and Development, the Northwest Information Center (NWIC), and the California Office of Historic Preservation (OHP), as required. **(MM CUL-1)**

21. Stop Construction upon Encountering Human Remains

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and Section 5097.98 shall be followed. If during the course of project construction, there is accidental discovery or recognition of any human remains, the following steps shall be taken:

L-48 cont'd

1. There shall be no further excavation or disturbance within 100 feet of the remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, 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.

2. Where the following conditions occur, the landowner or his or her authorized representative shall work with the Coroner to rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD if available or on the project site or off-site where the reburial would not be subject to further subsurface disturbance:

    - The NAHC is unable to identify an MLD or the MLD failed to make a

recommendation within 48 hours after being notified by the NAHC.

- The descendant identified fails to make a recommendation.
- The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner. **(MM CUL-3)**

22. Native American Construction Monitoring

To minimize the potential for destruction of or damage to existing or previously undiscovered burials, archaeological and Tribal Cultural Resources (TCRs) and to identify any such resources at the earliest possible time during project-related earthmoving activities, the project applicant and its construction contractor(s) shall implement the following measures:

- Native American Monitors from culturally affiliated Native American Tribes shall be invited to monitor the vegetation grubbing, stripping, grading or other ground-disturbing activities in the project area to determine the presence or absence of any cultural resources. Native American representatives from cultural affiliated Native American Tribes shall act as a representative of their Tribal Government and shall be consulted before any cultural studies or ground-disturbing activities begin.

L-48 cont'd

- Native American representatives and Native American Monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted, or slowed if such sites or objects are identified within the direct impact area. Only a Native American representative can recommend appropriate treatment of such sites or objects.
- If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or bone, are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until an Archaeologist who meets the Secretary of the Interior' s qualification standards can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the County, the California Office of Historic Preservation (OHP), and other appropriate agencies. Appropriate treatment measures may include development of avoidance or protection methods, archaeological excavations to recover important information about the resource, research, or other actions determined during consultation. **(MM CUL-4a)**

23. Avoidance and Preservation in place of Tribal Cultural Resources

Should Tribal Cultural Resources (TCRs) be discovered during project construction, avoidance and preservation in place is the preferred manner of mitigating impacts to TCRs and shall be accomplished by several means, including:

- Planning construction to avoid TCRs, archaeological sites and/ or other resources; incorporating sites within parks, green-space, or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity. As noted in Mitigation Measure CUL-4a, appropriate treatment measures may include archaeological excavations to recover information about the resource. Recommendations for avoidance of cultural resources shall be reviewed by the CEQA Lead Agency representative (Contra Costa County), interested Native American Tribes and the appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. If feasible, avoidance and design alternatives may include realignment within the project area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource. Native American representatives from interested Native American Tribes shall be allowed to review and comment on these analyses and shall have the opportunity to meet with the CEQA Lead Agency (Contra Costa County) representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.

L-48 cont'd

- If the resource can be avoided, the construction contractor(s), with Native American Monitors from culturally affiliated Native American Tribes present, shall install protective fencing outside the site boundary, including a buffer area, before construction restarts. The construction contractor(s) shall maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area shall be demarcated as an "Environmentally Sensitive Area." Native American representatives from interested Native American Tribes and the CEQA Lead Agency (Contra Costa County) representative shall

also consult to develop measures for long-term management of the resource and routine operation and maintenance within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional cultural properties and cultural landscapes, in accordance with State and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties); National Park Service Preservation Brief 36 (Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes) and using the Advisory Council on Historic Preservation (ACHP) Native American Traditional Cultural Landscapes Action Plan for further guidance. Use of temporary and permanent form of protective fencing shall be determined in consultation with the Native American representatives from interested Native American Tribes. **(MM CUL-4b)**

Geology and Soils:

L-48 cont'd

24. Prepare Grading and Construction Plans that Incorporate Geotechnical Investigation Recommendations

Prior to issuance of the grading permits for the proposed project, development of the final grading, foundation, and construction plans shall incorporate the site-specific earthwork, foundation, floor slab, finished grades, underground utilities, and pavement design recommendations, as detailed in the Geotechnical Investigation prepared by Cornerstone Earth Group dated August 22, 2018. The applicant shall coordinate with the County Department of Conservation and Development and County Geologist to tailor the grading and foundation plans, as needed, to reduce risk related to known soil and geologic hazards. The final grading, foundation, and construction plans for the proposed project shall be reviewed by the County Department of Conservation and Development and County Geologist. Grading operations shall meet the requirements of the recommendations included in the Preliminary Geotechnical Investigation prepared by Cornerstone Earth Group. During construction, the County Department of Conservation and Development shall monitor construction of the proposed project to ensure the earthwork operations are properly performed. **(MM GEO-1a)**

25. Prepare Final Construction Report

    The Project Geotechnical Engineer shall prepare a final report that documents the field observations and testing services provided during construction as well as provide a professional opinion on the compliance of construction with the recommendations in the Geotechnical Investigation. The final report can be segmented into an as-graded report that is issued at the end of rough grading, but prior to the installation of the foundations, and a second letter commenting on the inspections made during installation of foundations/parking lot/drainage facilities. The County Department of Conservation and Development will place a hard hold on the final inspection, to ensure that the Geotechnical Engineer's grading-foundation inspection letter-report is provided prior to requesting the final building inspection for each building. **(MM GEO-1b)**

Greenhouse Gas Emissions:

26. Prior to the issuance of building permits, the project applicant/developer shall demonstrate (e.g., provide building plans) to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed buildings are designed and will be built to, at minimum, meet the Tier 2 advanced energy efficiency requirements of the Nonresidential Voluntary Measures of the California Green Building Standards Code, Division A5.2, Energy Efficiency, as outlined under Section A5.203.1.2.2. **(MM GHG-1a)**

L-48 cont'd

27. Prior to issuance of occupancy permits, the project applicant/developer shall demonstrate to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed parking areas for passenger automobiles are designed and will be built to accommodate electric vehicle (EV) charging stations. At minimum, the parking shall be designed to accommodate a number of EV charging stations equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2. **(MM GHG-1b)**

28. Prior to issuance of occupancy permits, the project applicant/developer shall demonstrate to the satisfaction of the Contra Costa County Department of Conservation and Development, that the proposed parking areas for passenger automobiles are designed and will be built to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces for passenger automobiles shall equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.1.2. **(MM GHG-1c)**

29. To reduce idling emissions from transport trucks, which places restrictions on idling, the project applicant/developer shall have signage placed at truck access gates, loading docks, and truck parking areas that clearly notes idling is strictly prohibited on the subject property. In coordination with Contra Costa County, the project applicant/developer shall also place similar signs in the adjacent streets in the Richmond/San Pablo area. At minimum, each sign placed outside the interior premises of the subject property shall note the idling prohibition on the adjacent streets and include telephone numbers of the building facilities manager and the California Air Resources Board (ARB) to report violations. All signage shall be made of weather-proof materials. All site and architectural plans submitted to the Contra Costa County Department of Conservation and Development shall note the locations of these signs. Prior to issuance of occupancy permits, the Contra Costa County Department of Conservation and Development shall verify compliance with these requirements herein. **(MM GHG-1d)**

30. All landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the Contra Costa County Department of Conservation and Development to verify, to the County's satisfaction, that all landscaping equipment utilized will be electric-powered. **(MM GHG-1e)**

L-48 cont'd

31. Prior to the issuance of grading and building permits for the proposed project, the project applicant shall provide Contra Costa County with documentation demonstrating that the rooftop photovoltaic system will satisfy 100 percent of operational electricity consumed by the project, including the electricity demand resulting from the electric vehicle (EV) fleet.

    If the rooftop photovoltaic system will not be able to supply the additional electricity demand resulting from the EV fleet charging requirements, the project applicant shall, prior to the issuance of the certificate of occupancy for the proposed project, provide Contra Costa County with documentation demonstrating that the additional electricity demand will be supplied with 100 percent carbon-free electricity sources. These sources may include, but are not limited to, Pacific Gas and Electric Company (PG&E) 100 Percent Solar Choice electricity service option or Marin Clean Energy's (MCE) Deep Green 100 percent renewable electricity service option. This documentation shall also demonstrate that 100 percent carbon-free electricity sources will be utilized for the first 30 years of operation.

To monitor and ensure that 100 percent of electricity demand generated by the proposed project is supplied with 100 percent carbon-free electricity sources, the project applicant shall maintain records of all electricity consumption and supply associated with the proposed project's operation for five years and make these records available to the County upon request. **(MM GHG-f)**

32. Prior to the issuance of the certificate of occupancy for the proposed project, the project applicant shall provide the County with documentation demonstrating the purchase of voluntary carbon credits pursuant to the following performance standards and requirements: the carbon offsets shall achieve real, permanent, quantifiable, verifiable, additional and enforceable reductions as set forth in California Health and Safety Code Section 38562(d)(1) and (d)(2) and 17 California Code of Regulations § 95802(a); and one carbon offset credit shall mean the past reduction or sequestration of one metric ton (MT) of carbon dioxide equivalent (CO2e) that is "not otherwise required" (CEQA Guidelines § 15126.4(c)(3)). Such credits shall be purchased through a verified greenhouse gas (GHG) emissions credit broker and (i) shall be registered with, and retired by an Offset Project Registry, as defined in 17 California Code of Regulations § 95802(a), approved by ARB, such as, but not limited to the Climate Action Reserve, American Carbon Registry, or Verra, and (ii) shall be subject to protocols that are ARB-approved as required in 17 California Code of Regulations § 95970 (a)(1)-(2). Such credits shall be in an amount sufficient to offset operational GHG emissions of no less than 3,688 MT CO2e per year starting in 2021, 3,384 MT CO2e per year starting in 2023, 530 MT CO2e per year starting in 2025, 371 MT CO2e per year starting in 2027, and 2,205 MT CO2e per year starting in 2045 for the first 30 years of project operations, based on current estimates of the project related GHG emissions. Alternatively, the project applicant may purchase the total amount estimated over the lifetime of the proposed project (30 years), which is estimated to be 35,112 MT CO2e. The purchase shall be verified as occurring prior to approval of occupancy permits. Copies of emission estimates and offset purchase contract(s) shall be provided to the County for review and approval prior to the issuance of the certificate of occupancy for the proposed project. L-48 cont'd

Should the project applicant fail to meet the County's conditions of approval for the proposed project as described in Chapter 2, Project Description, of the Draft EIR, the project applicant shall recalculate the MT CO2e generated by project operation and purchase carbon credits equal to no less than the amount necessary to ensure that project emissions do not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the first year

of operation (2021), then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2023, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2025, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. If the project applicant fails to meet the County's conditions of approval, as described in Chapter 2, Project Description, of the Draft EIR, for the benchmark year of 2027, then the project applicant shall recalculate the proposed project's operational MT CO2e per year and purchase the necessary amount of carbon credits no later than December 31 in the following calendar year to ensure that the proposed project does not exceed 660 MT CO2e per year. All carbon credits purchased to offset project emissions shall meet the standards and requirements stated in this mitigation measure and documentation proving the purchase of carbon credits which meet these standards and requirements shall be provided to the County for review and approval. **(MM GHG-1g)**

L-48 cont'd

33. Prior to issuance of the initial building permit, the applicant shall pay the Contra Costa County, Department of Conservation and Development, Current Planning Division, a flat not-to-exceed amount of $500,000 as its fair share contribution towards the cost of funding an air quality improvement related project(s) for the benefit of the North Richmond area. The project(s) must benefit sensitive receptors within the North Richmond area as mitigation for the construction of a warehouse project with its associated emissions and truck traffic. The County will work with the District One Supervisor and the North Richmond Community to fund the project(s).

Hazards and Hazardous Materials:

34. Prepare Soil Management Plan and Health and Safety Plan

Prior to issuance of grading permits, the applicant shall retain a licensed professional to prepare and submit a Soil Management Plan and Health and Safety Plan for review and approval by Contra Costa Environmental Health. These plans shall include the following:

- Site control procedures to control the flow of personnel, vehicles, and materials in and out of the project site.
- Measures to minimize dust generation, stormwater runoff, and tracking soil off-site.
- If excavation de-watering is required, protocols to evaluate water quality and discharge/disposal alternative should be described.
- Protocols for conducting earthwork activities in areas where impacts soil, soil vapor, and/or groundwater are present or suspected. Worker training requirements, health and safety measures, and soil handling procedures shall be described.
- Protocols to be implemented if buried tanks, structures, wells, debris, or unidentified areas of impacted soils are encountered during construction activities.
- Protocols to evaluate the quality of soil suspected of being contaminated so that appropriate mitigation, disposal or reuse alternatives, if necessary, can be determined.
- Procedures to evaluate and document the quality of any soil imported to the project site. Soil containing chemicals exceeding residential (unrestricted use) screening levels or typical background concentrating of metals should not be accepted.
- Methods to monitor excavations for the potential presence of volatile chemical vapors. **(MM HAZ-1)**

L-48 cont'd

Hydrology and Water Quality:

35. Prepare Final Drainage Plan Prior to Grading

- In accordance with Division 914 of the Contra Costa County Ordinance Code, the project applicant shall collect and convey all stormwater entering and/or originating on this property, without diversion and within an adequate storm drainage facility, to a natural watercourse having definable bed and banks, or to an existing adequate public storm drainage system that conveys the stormwater to a natural watercourse. Any proposed diversions of the watershed shall be subject to hearing body approval. Prior to issuance of a grading permit, the applicant shall submit improvement plans for proposed drainage improvements, and a drainage report with hydrology and hydraulic calculations to the Engineering Services Division of the Public Works Department for review and approval that demonstrates the adequacy of the on-site drainage system and the downstream drainage system. The applicant shall verify the adequacy at any downstream drainage facility accepting stormwater from this project prior to discharging runoff. If the downstream system(s) is not adequate to handle the Existing Plus Project condition for the required design storm, improvements shall be constructed to make the system adequate. The applicant shall obtain access rights to make any necessary improvements to off-site facilities.

L-48 cont'd

- In accordance with Division 1014 of the Contra Costa County Ordinance Code, the applicant shall comply with all rules, regulations, and procedures of the National Pollutant Discharge Elimination System (NPDES) for municipal, construction and industrial activities as promulgated by the California State Water Resources Control Board, or any of its Regional Water Quality Control Boards (San Francisco Bay—Region 2); and

- Submit a Final Stormwater Control Plan and a Stormwater Control Operation and Maintenance Plan (O&M Plan) to the Public Works Department, which shall be reviewed for compliance with the County's NPDES Permit and shall be deemed consistent with the County's Stormwater Management and Discharge Control Ordinance (Division 1014) prior to issuance of a building permit. Improvement Plans shall be reviewed to verify consistency with the Final Stormwater Control Plan and compliance with the Contra Costa Stormwater C.3 Guidebook of the County's NPDES Permit and the County's Stormwater Management and Discharge Control Ordinance (Division 1014) and be designed to discourage prolonged standing/ponding of water on-site. **(MM HYD-3)**

Noise:

36. Implement Noise Reduction Measures During Construction

    - The construction contractor shall ensure that grading activities shall be restricted to the hours between 7:30 a.m. and 5:30 p.m., Monday through Friday. **(MM NOI-1)**

Transportation:

37. Prior to issuance of the certificate of occupancy, the applicant shall retain a qualified transportation consultant to prepare a project-specific Transportation Demand Management (TDM) Program that could incorporate the following measures, where feasible. The TDM Program shall be reviewed and approved by the County, and the applicant shall implement all approved TDM measures.

    - Commute Trip Reduction Program
    - Ride-sharing Program
    - End of Trip Facilities
    - Last Mile Services
    - New Employee Commute Orientation
    - Preferential Parking Program
    - Employer-Sponsored Vanpool
    - Transportation Network Company (TNC) Partnership
    - Employer-Sponsored Shuttle to/from BART Station(s) or Other Transit Hub
    - Carpool and Vanpool Ride-Matching Services **(MM TRANS-1)**

38. Prior to issuance of the certificate of occupancy for the proposed project, the applicant shall install a median and bulb-outs on Fred Jackson Way along the project frontage, stop signs at the project driveways, and signage prohibiting vehicles from turning left out of the project driveways. **(MM TRANS-2a)**

39. Prior to issuance of the building permit, the applicant shall (1) pay the North Richmond Area of Benefit (AOB) fee and (2) commit to installing one of the following improvements on Fred Jackson Way, Market Avenue, or Chesley Avenue prior to project occupancy:

    - Bulb-outs
    - Elevated crosswalks
    - Speed tables
    - Chicanes **(MM TRANS-2b)**

L-48 cont'd

40. Prior to the issuance of the certificate of occupancy, the applicant shall install curb ramps where required at all pedestrian walkways and pedestrian connections between the three buildings. The applicant shall install pedestrian crossings on all four approaches of Fred Jackson Way and Brookside Drive (including ADA-compliant pedestrian landing islands). The applicant shall install pedestrian crossings on all four approaches of Fred Jackson Way and Pittsburg Avenue (including ADA-compliant pedestrian landing islands). **(MM TRANS-4a)**

41. Prior to the issuance of the certificate of occupancy, the applicant shall install long-term bicycle parking consistent with County Code Section 82-16.412 and other bicycle amenities (showers, changing rooms, bike repair tools/station, etc.) in a convenient location. **(MM TRANS-4b)**

Landscaping:

42. Final Landscaping Plan: At least 30 days prior to CDD stamp-approval of plans for issuance of a building permit, a final landscape and irrigation plan shall be submitted to the CDD for review and approval. The landscaping plan shall conform to the State's Model Water Efficient Landscape Ordinance or the County's Ordinance, if one is adopted. Prior to requesting a final inspection, the approved landscaping shall be installed and evidence of the installation (e.g., photos) shall be provided for the review and approval of CDD.

L-48 cont'd

43. Restitution for the removal of (7) code-protected tree:

    a. Planting and Irrigation Plan: Prior to issuance of a grading or building permit, whichever occurs first, the applicant shall submit a tree planting and irrigation plan prepared by a licensed arborist or landscape architect for the review and approval of the Department of Conservation and Development, Community Development Division (CDD). *See the North Richmond Design Guidelines for species and size requirements.*

    b. Required Security to Assure Completion of Plan Improvements: A security shall be provided to ensure that the approved planting and irrigation plan is implemented. Prior to issuance of a building permit, the applicant shall submit a security that is acceptable to the CDD.

44. The Final Landscaping Plan shall include sufficient plantings along the southern property boundary to establish a vegetative screening aimed at blocking dust and particulate matter from migrating southward unabated. The vegetative screening shall include fast growing, tall species (e.g., Italian and Leyland cypress) with a density that will accomplish the goal of capturing the maximum amount of dust and particulate matter feasible (e.g., two or three rows of trees

offset from one another and appropriately spaced).

45. Any proposed tree alteration, removal, or encroachment within a drip line of code-protected trees that are not identified with this permit approval will require submittal of a Tree Permit application for review and consideration by CDD.

46. The applicant shall comply with California Model Water Efficient Landscape Ordinance (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495) and/or any applicable State mandated landscape/water related requirements applicable at the time of landscaping installation for the project. To the maximum extent feasible, the project proponent shall use drought tolerant vegetation for the development.

    Project sponsors should be aware that Section 31 of the East Bay Municipal Utility District's (EBMUD) Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the project sponsor's expense. Any questions regarding these requirements can be directed to EBMUD Water Service Planning at (510) 287-1365.

L-48 cont'd

General Construction:

Construction Period Restrictions and Requirements

47. During construction, the following mitigation measures shall be implemented:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.

- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Bay Area Air Quality Management District (BAAQMD) phone number shall also be visible to ensure compliance with applicable regulations.

48. Implement the following Emission Reduction Measures into the final design of the project:

- The project sponsor shall require their contractor and subcontractors to fit all internal combustion engines with mufflers which are in good condition.

- A dust and litter control program shall be submitted for the review and approval of the Community Development Division staff. Any violation of the approved program or applicable ordinances shall require an immediate work stoppage. Construction work shall not be allowed to resume until, if necessary, an appropriate construction bond has been posted.

- The applicant shall make a good-faith effort to avoid interference with existing neighborhood traffic flow.

- Transporting of heavy equipment and trucks shall be limited to weekdays between the hours of 8:30 A.M. and 4:30 P.M. and prohibited on Federal and State Holidays.

- The site shall be maintained in an orderly fashion. Following the cessation of construction activity, all construction debris shall be removed from the site.

- All construction activities shall be limited to the hours of 7:00 A.M. to 6:00

L-48 cont'd

P.M., Monday through Friday, and shall be prohibited on state and federal holidays on the calendar dates that these holidays are observed.

- Prohibit unnecessary idling of internal combustion engines.
- Locate stationary noise generating equipment as far from surrounding residential properties as possible.
- Saturday work may be permissible upon review and approval by CDD staff of a written request by the contractor/developer indicating the circumstances warranting such Saturday work and the nature of the work to be performed.

Debris Recovery:

49. At least 15 days prior to the issuance of a building permit the developer shall demonstrate compliance with the debris recovery program, which requires at least 50 percent of the jobsite debris generated by construction projects of 5,000 square feet or greater to be recycled, or otherwise diverted from landfill disposal.
50. Dumpsters or refuse areas shall be screened from view from any roadway.
51. The Development Plan application was subject to an initial deposit of $116,880.80 that was paid with the application submittal, plus time and material costs if the application review expenses exceed the initial deposit. Any additional fee due must be paid prior to issuance of a building permit, or 60 days of the effective date of this permit, whichever occurs first. The fees include costs through permit issuance and final file preparation. Pursuant to Contra Costa County Board of Supervisors Resolution Number 2013/340, where a fee payment is over 60 days past due, the application shall be charged interest at a rate of ten percent (10%) from the date of approval. The applicant may obtain current costs by contracting the project planner. A bill will be mailed to the applicant shortly after permit issuance in the event that additional fees are due.

L-48 cont'd

PUBLIC WORKS CONDITIONS OF APPROVAL FOR PERMIT CDDP18-03007 and SUBDIVISION CDMS19-00009

Applicant shall comply with the requirements of Title 8, Title 9 and Title 10 of the Ordinance Code. Any exception(s) must be stipulated in these Conditions of Approval. Conditions of Approval are based on the site plan submitted to the Department of Conservation and Development on August 28, 2018 and Tentative Map received October 29, 2019.

UNLESS OTHERWISE SPECIFIED, COMPLY WITH THE FOLLOWING CONDITIONS OF APPROVAL PRIOR TO ISSUANCE OF A BUILDING PERMIT.

General Requirements:

52. Improvement plans prepared by a registered civil engineer shall be submitted to the Public Works Department, Engineering Services Division, along with review and inspection fees, and security for all improvements required by the Ordinance Code or the conditions of approval of this permit. Any necessary traffic signing and striping shall be included in the improvement plans for review by the Transportation Engineering Division of the Public Works Department.

53. The Parcel Map merging the underlying properties into three parcels shall be approved by the County Board of Supervisors and filed at the County Recorder's Office.

Roadway Improvements:

Fred Jackson Way

54. Applicant shall construct curb, 8-foot wide concrete sidewalk (exclusive of curb width if constructed monolithically) street lights, longitudinal and transverse drainage infrastructure, stormwater management facilities, signage, striping and pavement conforms to existing improvements. In general, the face of curb for these improvements shall be 32-feet east of the ultimate centerline of Fred Jackson Way. L-48 cont'd

55. The project is limited to a total of three driveways along the Fred Jackson Way frontage: a main driveway opposite the intersection at Pittsburg Avenue, one between Pittsburg Avenue and Brookside Drive, and one between Pittsburg Avenue and Da Villa Road. Driveways designated for truck access shall be 40-50 feet wide. All others shall be 26 feet wide. Exact location of these northern and southern driveways are subject to review and approval of Public Works.

56. Install curb bulb-outs at the intersection of Pittsburg Avenue, as well as "pork chop" medians and signage near the driveways left-turnout movements from the project site to direct traffic north along Fred Jackson Way or west along Pittsburg Avenue toward Richmond Parkway. **MM TRANS-2a, MM TRANS-2b**

57. Install traffic signals at the intersections of Fred Jackson Way with both Brookside Drive and Pittsburg Avenue. The traffic signal at the Brookside Drive intersection shall allow full turning movements at all approaches. The signal at Pittsburg Avenue will include a separate southbound to west bound right turn

lane, permitted left turns on the northbound and southbound approaches and split phases on the eastbound and westbound approaches. The applicant shall install pedestrian crossings on all four approaches of both signalized intersections, including ADA-compliant pedestrian landing islands as applicable. Construction costs for installation of these signals would be credited against the project's North Richmond AOB fee obligation. **MM TRANS-4**

58. The applicant shall submit a preliminary "sketch" plan to the Public Works Department for review showing all required improvements to the Fred Jackson Way frontage, signalized intersections and nearby offsite County roadway conforms. The sketch plan shall be to scale, show horizontal alignments, transitions, curb lines, and lane striping. It shall provide sight distance at the project driveways for a design speed of 40 miles per hour. Truck turning exhibits should also be included to show accessibility to/from project driveways and potential turning movement conflicts. The plan shall extend a minimum of 175 feet beyond the limits of the proposed work. Final alignment and driveway locations will be subject to Public Works approval based on compatibility with existing and proposed right of way dedications and improvements on adjacent and nearby properties.

L-48 cont'd

Brookside Drive

59. Applicant shall construct curb, minimum 5-foot sidewalk (excluding width of curb), necessary longitudinal and transverse drainage, stormwater management facilities, street lighting, signage striping, pavement widening and transitions along the entire project frontage of Brookside Drive. Applicant shall construct face of curb 20 feet from the ultimate road centerline.

60. The project is limited to a total of three driveways along Brookside Drive frontage Driveways designated for truck access shall be 40-50 feet wide. All others shall be 26 feet wide. Exact location of these driveways are subject to review and approval of Public Works. Driveways shall incorporate signage and turn restrictions to discourage cut through traffic in residential neighborhoods.

61. The applicant shall submit a preliminary "sketch" plan to the Public Works Department for review showing all required improvements to the Brookside Drive frontage and nearby offsite conforms. Format of said "Plan" shall be as described above relative to Fred Jackson Way.

Off-Site Traffic Mitigation

62. In 2017, the North Richmond Area of Benefit (AOB) traffic mitigation fee program was updated to require new developments within North Richmond to

contribute towards traffic calming strategies to reduce cut-through truck traffic in the neighborhood. Pursuant to Mitigation Measure TRANS-2b, the applicant will be required to develop traffic calming measures for review and approval by the Public Works Department, execute an agreement and post security to construct the identified improvement(s) prior to filing the Parcel Map for the project. The cost of the off-site traffic calming improvements would be counted as work completed and would be provided credit towards the North Richmond AOB fee obligation. As noted above, the two signals required along Fred Jackson Way will be credited to this obligation.

Miscellaneous

63. Any cracked and displaced curb, gutter, and sidewalk within the project's limits of work shall be removed and replaced. Concrete shall be saw cut prior to removal. Existing lines and grade shall be maintained. New curb and gutter shall be doweled into existing improvements.

Access to Adjoining Property:

Proof of Access

64. Applicant shall furnish proof to the Public Works Department of the acquisition of all necessary rights of way, rights of entry, permits and/or easements for the construction of off-site, temporary or permanent, public and private road and drainage improvements.

65. Applicant shall furnish proof to the Public Works Department that legal access to the property is available from Fred Jackson Way and Brookside Drive.

Encroachment Permit

66. Applicant shall obtain an encroachment permit from the Application and Permit Center, if necessary, for construction of improvements within the right of way of Fred Jackson Way, Brookside Drive and Pittsburg Avenue.

Abutter's Rights:

67. Applicant shall restrict access along the Fred Jackson Way and Brookside Drive frontages of this property, with the exception of the access points shown on the applicant's site plan, as specifically approved under these conditions of approval. Owner shall relinquish abutter's rights of access along both frontages with the exception of the access points shown.

L-48 cont'd

Road Dedications:

68. Property Owner shall convey to the County, by Offer of Dedication, a minimum of ten feet of right of way along the entire Brookside Drive frontage for the planned future half-width of 30 feet from the ultimate centerline. Additional right of way may be necessary to accommodate public utilities.

69. If the applicant opts to separate public street stormwater runoff from the on-site runoff by constructing dual stormwater management facilities, the infrastructure associated with runoff from the public right of way may necessitate additional right of way along Fred Jackson Way and/or Brookside Drive. Property Owner shall convey to the County, by Offer of Dedication, any additional right-of-way necessary for operation and maintenance of stormwater management facilities associated with treatment of runoff from the public right of way.

Access & Utility Easements:

70. Proposed Private Access and Utility Easements between the three subdivision parcels should be delineated on the Parcel Map to provide for internal circulation and access to common driveways and utilities.

L-48 cont'd

Da Villa Road

71. Owner shall grant a (generally) 15-foot wide Access and Utility Easement ("PAUE") to the property currently identified as Assessors' Parcel No. 409-300-002 (541 Da Villa Road). Said easement shall lie contiguous to the south property line of the project site (coincident with the north line of the Da Villa Road) and extend from the grantee's property westerly to Fred Jackson Way. To eliminate angle points in the easement, additional easement area may be required to create a centerline alignment for what will effectively be a 40-foot wide Da Villa Road easement that conforms to County collector road standards.

72. Coincident with the above PAUE, owner shall dedicate a non-exclusive Access and Drainage Easement to the Contra Costa County Flood Control and Water Conservation District ("District") to supplement the District's existing access along Da Villa Road and encumber any portions of Line A of Drainage Area 19A to be constructed by this project.

Countywide Street Light Financing:

73. Applicant shall annex to the Community Facilities District (CFD) 2010-1 formed for Countywide Street Light Financing.

Landscaping:

74. If applicable, the applicant shall install and guarantee all SWCP landscaping and automatic irrigation facilities within the public-right-of-way, to be maintained by the County. The landscape facilities shall be maintained by the developer: a) for a minimum of 180 days after installation and b) until the plants have become established.

75. If applicable, the applicant shall submit four sets of landscape and automatic irrigation plans and cost estimates, prepared by a licensed landscape architect, for all SWCP landscaping and automatic irrigation facilities to be maintained by the County to the Public Works Department for review approval, prior to issuance of building permits. Applicant shall pay appropriate fees in accordance with County Ordinance. Landscaping shall meet the requirements of the Contra Costa County Public Works Department Landscaping Design, Construction and Maintenance standards and Guidelines for County Maintained Facilities.

76. All landscaping to be maintained by the property owner shall be submitted to the CDD for review and approval.

77. Applicant shall apply to the Public Works Department for annexation to the Community Facilities District (CFD) No. 2006-1 (North Richmond Area Maintenance Services) for the future maintenance of area wide medians and landscaping. The annexation of property into the CFD must be completed prior to occupancy and the applicant should be aware that the annexation process may take approximately 60 days.

L-48 cont'd

Pedestrian Access:

78. Applicant shall design all public and private pedestrian facilities in accordance with Title 24 (Handicap Access) and the Americans with Disabilities Act. This shall include all sidewalks, paths, driveway depressions, and curb ramps.

79. Curb ramps and driveways shall be designed and constructed in accordance with current County standards. A detectable warning surface (e.g. truncated domes) shall be installed on all curb ramps. Adequate right-of-way shall be dedicated at the curb returns to accommodate the returns and curb ramps; accommodate a minimum 4-foot landing on top of any curb ramp proposed.

Parking:

80. "No Parking" signs shall be installed along Fred Jackson Way and Brookside Drive subject to the review of the Public Works Department and the review and approval of the Board of Supervisors.

Utilities/Undergrounding:

81. Applicant shall underground all new and existing utility distribution facilities, including those along the frontage of Fred Jackson Way and Brookside Drive, including the remnant of the overhead utilities on the north side of Brookside Drive east of Fred Jackson Way. The developer shall provide joint trench composite plans for the underground electrical, gas, telephone, cable television and communication conduits and cables including the size, location and details of all trenches, locations of building utility service stubs and meters and placements or arrangements of junction structures as a part of the Improvement Plan submittals for the project. The composite drawings and/or utility improvement plans shall be signed by a licensed civil engineer.

Drainage Improvements:

Collect and Convey

82. The applicant shall collect and convey all stormwater entering and/or originating on this property, without diversion and within an adequate storm drainage system, to *an adequate* natural watercourse having definable bed and banks, or to an existing adequate public storm drainage system which conveys the stormwater to *an adequate* natural watercourse, in accordance with Division 914 of the Ordinance Code. L-48 cont'd

    The nearest public drainage facilities are Lines A and B of Drainage Area 19A located along the west side of Fred Jackson Way that will convey stormwater run-off from the site to the Wildcat Creek and San Pablo Creek respectively. The Drainage Study included in the DEIR and supplemental documentation reviewed by Public Works indicates these lines have sufficient capacity to satisfy the Ordinance Code requirements. Staff concurs with this preliminary analysis, pending final assessment in conjunction with review of the final construction drawings and documents. **MM HYD-3**

Miscellaneous Drainage Requirements:

83. Applicant shall prevent storm drainage from draining across the sidewalk(s) and driveway(s) in a concentrated manner.

84. Private storm drain easements conforming to the width specified in Section 914-14.004 of the County Ordinance Code, shall be conveyed across any storm drain conveyance or management facilities that serve more than one parcel.

85. Applicant shall dedicate Public Storm Drain Easements over any portions of Lines A or B (DA 19A) that traverse the project site that are not otherwise

encumbered in the easement dedicated to the District for the widening of Da Villa Road as described above.

National Pollutant Discharge Elimination System (NPDES):

86. The applicant shall be required to comply with all rules, regulations, and procedures of the National Pollutant Discharge Elimination System (NPDES) for municipal, construction, and industrial activities as promulgated by the California State Water Resources Control Board, or any of its Regional Water Quality Control Boards (San Francisco Bay –Region II).

    Compliance shall include developing long-term best management practices (BMPs) for the reduction or elimination of storm water pollutants. The project design shall incorporate wherever feasible, the following long-term BMPs in accordance with the Contra Costa Clean Water Program for the site's storm water drainage:

    - Minimize the amount of directly connected impervious surface area.
    - Install approved full trash capture devices on all catch basins (excluding catch basins within bioretention basins) as reviewed and approved by Public Works Department. Trash capture devices shall meet the requirements of the County's NPDES permits.
    - Place advisory warnings on all catch basins and storm drains using current storm drain markers.
    - Construct concrete driveway weakened plane joints at angles to assist in directing run-off to landscaped/pervious areas prior to entering the street curb and gutter.
    - Filtering Inlets.
    - The applicant shall sweep the paved portion of the site at least once a year between September 1st and October 15th utilizing a vacuum type sweeper. Verification (invoices, etc.) of the sweeping shall be provided to the County Clean Water Program Administrative Assistant at 255 Glacier Drive, Martinez, CA 94553; (925)313-2238.
    - Trash bins shall be sealed to prevent leakage, OR, shall be located within a covered enclosure.
    - Other alternatives comparable to the above as approved by the Public Works Department. **MM HYD-1**

L-48 cont'd

Stormwater Management and Discharge Control Ordinance:

87. The applicant shall submit a FINAL Storm Water Control Plan (SWCP) and a Stormwater Control Operation and Maintenance Plan (O+M Plan) to the Public Works Department, which shall be reviewed for compliance with the County's National Pollutant Discharge Elimination System (NPDES) Permit and shall be deemed consistent with the County's Stormwater Management and Discharge Control Ordinance (§1014) prior to issuance of certificate of occupancy. To the extent required by the NPDES Permit, the Final Stormwater Control Plan and the O+M Plan will be required to comply with NPDES Permit requirements that have recently become effective that may not be reflected in the preliminary SWCP and O+M Plan. All time and materials costs for review and preparation of the SWCP and the O+M Plan shall be borne by the applicant. **MM HYD-3**

    - Improvement Plans shall be reviewed to verify consistency with the final SWCP and compliance with Provision C.3 of the County's NPDES Permit and the County's Stormwater Management and Discharge Control Ordinance (§1014).
    - Stormwater management facilities shall be subject to inspection by Public Works Department staff; all time and materials costs for inspection of stormwater management facilities shall be borne by the applicant.
    - Prior to filing the Parcel Map the property owner(s) shall enter into a standard Stormwater Management Facility Operation and Maintenance Agreement with Contra Costa County, in which the property owner(s) shall accept responsibility for and related to operation and maintenance of the stormwater facilities, and grant access to relevant public agencies for inspection of stormwater management facilities.
    - Prior to filing the Parcel Map the property owner(s) shall annex the subject property into Community Facilities District (CFD) No. 2007-1 (Stormwater Management Facilities), which funds responsibilities of Contra Costa County under its NPDES Permit to oversee the ongoing operation and maintenance of stormwater facilities by property owners.
    - Any proposed water quality features that are designed to retain water for longer than 72 hours shall be subject to the review of the Contra Costa Mosquito & Vector Control District.

L-48 cont'd

Area of Benefit Fee Ordinance:

88. The applicant shall comply with the requirements of the Bridge/Thoroughfare Fee Ordinance for the WCC Transit/Pedestrian, WCCTAC Bridge/Road, and North Richmond Areas of Benefit as adopted by the Board of Supervisors. These fees will be collected prior to issuance of building permits on this site.

89. Prior to constructing any public improvements, the applicant, shall contact Public Works Department to determine the extent of any eligible credits or reimbursements against the area of benefit fees.

Drainage Area Fee Ordinance:

90. The applicant shall comply with the drainage fee requirements for Drainage Area 19A as adopted by the Board of Supervisors prior to initiation of the use requested with this application.

91. Certain improvements required by the Conditions of Approval for this development or the County Subdivision Ordinance may be eligible for credit or reimbursement against the drainage area fee. The developer should contact the Public Works Department to determine the extent of any credit or reimbursement for which the developer may be eligible. Any credit or reimbursements shall be determined prior to issuance of a Building Permit or as approved by the Flood Control District.

L-48 cont'd

ADVISORY NOTES

ADVISORY NOTES ARE NOT CONDITIONS OF APPROVAL; THEY ARE PROVIDED TO ALERT THE APPLICANT TO ADDITIONAL ORDINANCES, STATUTES, AND LEGAL REQUIREMENTS OF THE COUNTY AND OTHER PUBLIC AGENCIES THAT MAY BE APPLICABLE TO THIS PROJECT.

A. NOTICE OF OPPORTUNITY TO PROTEST FEES, ASSESSMENTS, DEDICATIONS, RESERVATIONS OR OTHER EXACTIONS PERTAINING TO THE APPROVAL OF THIS PERMIT.

Pursuant to California Government Code Section 66000, et seq., the applicant has the opportunity to protest fees, dedications, reservations or exactions required as part of this project approval. To be valid, a protest must be in writing pursuant to Government Code Section 66020 and must be delivered to the Community Development Division within a 90-day period that begins on the date that this project is approved. If the 90th day falls on a day that the Community Development Division is closed, then the protest must be submitted by the end of the next business day.

B. The applicant may be required to comply with the requirements of the Bridge/Thoroughfare Fee Ordinance for the North Richmond, West Contra Costa

Transportation Advisory Committee (WCCTAC) Bridges/Roads, and WCCTAC Transit/Pedestrian Areas of Benefit Area of Benefit as adopted by the Board of Supervisors.

C. This project may be subject to the requirements of the Department of Fish and Wildlife. It is the applicant's responsibility to notify the California Department of Fish and Wildlife, Bay Delta Region (Region 3), 825 Cordelia Road, Suite 100, Fairfield, CA 94534 of any proposed construction within this development that may affect any fish and wildlife resources, per the Fish and Wildlife Code.

D. This project may be subject to the requirements of the Army Corps of Engineers. It is the applicant's responsibility to notify the appropriate district of the Corps of Engineers to determine if a permit is required, and if it can be obtained.

E. Prior to applying for a building permit, the applicant is strongly encouraged to contact the following agencies to determine if additional requirements and/or additional permits are required as part of the project:

- Contra Costa County Building Inspection Division
- Contra Costa County Grading Division
- Contra Costa County Environmental Health Division
- Contra Costa County Consolidated Fire Protection District
- East Bay Municipal Utility District
- West County Wastewater District
- LAFCO
- City of Richmond
- DTSC

L-48 cont'd

Attachment E:
Sierra Club/Stockton/Greenlaw Development, LLC
Settlement Agreement

SETTLEMENT AGREEMENT AND RELEASE

This Settlement Agreement and Release of All Claims ("Agreement") is entered into by and between the Sierra Club, a California nonprofit public benefit association, the City of Stockton ("City"), a municipal services corporation, and Greenlaw Development, LLC, a California limited liability company ("Developer"), (collectively referred to as "Parties" or singularly "Party"), to terminate fully and finally all disputes concerning the matters set forth below.

RECITALS

WHEREAS, Developer, proposes to develop an approximately 203-acre site in the South Stockton area commonly known as the Mariposa Industrial Park for light industrial land uses (the "Project"). The conceptual site plan proposes construction and operation of 3,616,870 square feet of warehouse and ancillary office uses, approximately 1,831 auto parking spaces, 1,107 truck and trailer parking spaces, and related infrastructure. Developer has applied to the City for the following project approvals: (1) adoption of a Resolution certifying the Mariposa Industrial Park Environmental Impact Report (SCH #2020120283) ("EIR"), including a Statement of Overriding Considerations, and adoption of a Mitigation Monitoring and Reporting Program ("MMRP"); and (2) adoption of an Ordinance for the Pre-zoning of APNs 179-220-10; -11; -12; -13; -16; -17; -18-; 19; and -24 (the "Property") to Industrial, Limited (IL); and (3) adoption an Ordinance for a Development Agreement; and (4) adoption of a Resolution authorizing the filing of an annexation application with the San Joaquin Local Agency Formation Commission (collectively the "Project Approvals"); and L-49

WHEREAS, The Sierra Club and the California Attorney General submitted comments on the EIR requesting that additional air quality and other mitigation measures be included in the EIR and MMRP for the Project and that a fund to mitigate impacts on affected residents be created; and

WHEREAS, the Parties wish to resolve fully and finally all disputes which may exist between the Parties concerning the Project Approvals.

NOW, THEREFORE, based upon the foregoing recitals and the terms, conditions, covenants, and agreements contained above and incorporated in full below, the Parties agree as follows:

AGREEMENT

For good and valuable consideration, the receipt of which is acknowledged by each Party hereto, the Parties promise and agree as follows:

1. If the City approves the Project, and (i) the certified EIR and adopted MMRP include all of the Mitigation Measures in the attached Mariposa Industrial Project Enhanced Measures, and (ii) the authorized Development Agreement includes all of the revised terms in the attached Mariposa Industrial Project Enhanced Measures, then (iii) neither the Sierra Club nor any of its affiliates will file any complaints, claims, grievances, special proceedings or any other actions against the City or Developer with any state,

1

federal, or local agency or court challenging the Project Approvals or the proposed annexation of the Project site to the City of Stockton. If an affiliate of the Sierra Club is determined to have made a challenge to the Project Approvals or the proposed annexation of the Project site to the City of Stockton in violation of this Section 1, such violation shall constitute a breach of this Agreement by the Sierra Club.

2. The City will draft and consider a comprehensive Warehouse Sustainability Ordinance for future projects that establishes development standards for the construction of industrial warehousing and distribution facilities that exceed 100,000 square feet subject to periodic review for consistency with current regulatory agency recommendations before December 31, 2023. The City may incorporate the addition of warehouse sustainability requirements through its current Development Code revision/update process, provided that the ordinance is considered before December 31, 2023. City staff shall recommend adoption of the ordinance.

3. The City agrees that the Mitigation Measures in the attached Mariposa Industrial Project Enhanced Measures are designed to mitigate potentially significant environmental impacts of warehouse projects. If, prior to adopting the Warehouse Sustainability Ordinance, the City considers approving a project that proposes to develop industrial warehousing or distribution facilities that exceed 100,000 square feet, the City shall include all such applicable measures from the Mariposa Industrial Project Enhanced Measures in any Environmental Impact Report or Mitigated Negative Declaration for the project and consider requiring the project to comply with them. L-49 cont'd

4. Developer agrees to comply with the attached Mariposa Industrial Project Enhanced Measures and will comply with all applicable City building code requirements.

5. If the City approves the Project, the City will coordinate with the County of San Joaquin to develop and install signage prohibiting non-emergency vehicle access to the project site from Clark Drive or Marfargoa Road. Developer will be responsible for the costs of signage determined to be appropriate by the City and the County.

6. Developer shall pay Sierra Club $34,350 as reimbursement for Sierra Club's attorney's fees and costs incurred in the administrative phase of the Project Approvals. Payment shall be made to the Shute, Mihaly & Weinberger LLP trust account. Developer shall make this payment within ten (10) days of the expiration of the statute of limitations set forth in Section 21167 of the Public Resources Code on actions or proceedings to attack, review, set aside, void, or annul the City of Stockton's determination of CEQA compliance for the Project Approvals, provided that no such action or proceeding has been initiated by the Sierra Club or its affiliates.

7. This Agreement shall be effective and binding upon the Parties only after the execution of both (1) this Agreement by all parties, and (2) the execution of a Memorandum of Understanding between the California Attorney General and the City relating to the City considering an ordinance to establish development standards for industrial warehouse land uses.

8. Miscellaneous.

a. Exclusive Remedies. The Parties' sole and exclusive remedy for breach of this Agreement shall be an action for specific performance or injunction. In no event shall any Party be entitled to monetary damages for breach of this Agreement. In addition, no legal action for specific performance or injunction shall be brought or maintained until: (a) the non-breaching Party provides written notice to the breaching Party which explains with particularity the nature of the claimed breach, and (b) within thirty (30) days after receipt of said notice, the breaching Party fails to cure the claimed breach or, in the case of a claimed breach which cannot be reasonably remedied within a thirty (30) day period, the breaching Party fails to commence to cure the claimed breach within such thirty (30) day period, and thereafter diligently complete the activities reasonably necessary to remedy the claimed breach.

b. All notices and other communications required to be provided pursuant to this Agreement shall be by electronic mail and by first class mail to the following persons at the following addresses:

L-49 cont'd

SIERRA CLUB:

Margo Praus
Delta-Sierra Group
P.O. Box 9258
Stockton, CA 95208
margopraus@msn.com

with copy to:

Sierra Club
Aaron Isherwood, Coordinating Attorney
2101 Webster St., Suite 1300
Oakland, CA 94612
aaron.isherwood@sierraclub.org

with copy to:

Shute, Mihaly & Weinberger LLP
Heather Minner
396 Hayes Street
San Francisco, CA 94102
minner@smwlaw.com

3

GREENLAW DEVELOPMENT, LLC:

Greenlaw Partners
18301 Von Karmen Avenue, Suite 250
Irvine, CA 92612
Attn: Rob Mitchell
Email: rob@greenlawpartners.com

with copy to:

Cochran Law Group
18301 Von Karman Avenue, Suite 270
Irvine, California 92612
Attn: Thia Cochran
Email: thia@cochranlawgroup.com

with copy to:

Law Office of Daniel P. Doporto
Daniel P. Doporto
3478 Buskirk Avenue, Suite 1000
Pleasant Hill, CA 94523
Email: ddoporto@doportolaw.com

L-49 cont'd

CITY OF STOCKTON:

City Attorney's Office
425 N. El Dorado Street
Stockton, CA 95202
City.attorney@stocktonca.gov

with copy to:

City Manager's Office
425 N. El Dorado Street
Stockton, CA 95202
City.manager@stocktonca.gov

c. Binding on Successors. The terms, covenants, and conditions of this Agreement shall be binding upon and shall inure to the benefit of the heirs, executors, administrators, successors and assignees of the respective Parties. Developer shall record a copy of this Agreement against the Property. Developer will provide a copy of the recorded Agreement to Sierra Club within fifteen (15) days of such recording. The Parties shall give notice to all other Parties of any successor or assignee to the Party.

d. Non-Admission of Liability. The Parties acknowledge and agree that this Agreement is a settlement of disputed claims. Neither the fact that the Parties have settled nor the terms of this Agreement shall be construed in any manner as an admission of any liability by any Party.

e. Assistance of Counsel. The Parties each specifically represent that they have consulted to their satisfaction with and received independent advice from their respective counsel prior to executing this Agreement concerning the terms and conditions of this Agreement.

f. Waiver. Failure to insist on compliance with any term, covenant or condition contained in this Agreement shall not be deemed a waiver of that term, covenant or condition, nor shall any waiver or relinquishment of any right or power contained in this Agreement at any one time or more times be deemed a waiver or relinquishment of any right or power at any other time or times.

g. Severability. Should any portion, word, clause, phrase, sentence or paragraph of this Agreement be declared void or unenforceable, such portion shall be considered independent and severable from the remainder, the validity of which shall remain unaffected.

h. Governing Law and Venue. This Agreement is made and entered into in the State of California, and shall in all respects be interpreted, enforced and governed under the laws of said State without giving effect to conflicts of laws principles. Any action to enforce, invalidate, or interpret any provision of this Agreement shall be brought in San Joaquin County Superior Court.

i. Entire Agreement. This Agreement constitutes the entire agreement between the Parties who have executed it and supersedes any and all other agreements, understandings, negotiations, or discussions, either oral or in writing, express or implied between the Parties to this Agreement. No representation, inducement, promise, agreement or warranty not contained in this Agreement, including, but not limited to, any purported supplements, modifications, waivers, or terminations of this Agreement shall be valid or binding, unless executed in writing by all of the Parties to this Agreement.

j. Each of the signatories hereto represents and warrants that he or she is competent and authorized to enter into this Agreement on behalf of the Party for whom he or she purports to sign.

k. Counterparts. This Agreement may be executed in multiple counterparts, each of which shall be considered an original but all of which shall constitute on agreement.

[SIGNATURES COMMENCE ON FOLLOWING PAGE]

L-49 cont'd

IN WITNESS WHEREOF, the undersigned execute this Settlement Agreement and Release, and hereby agree to all terms and condition herein, on the dates set forth below.

SIERRA CLUB

By: /s/ Mary Travis

Name: Mary Travis

Its: Chair, Delta-Sierra Group

Date: 11-11-2022

GREENLAW DEVELOPMENT, LLC

By: [signature]

Name: Rob Mitchell

Its: Partner

Date: 11/20/22

CITY OF STOCKTON

By: [signature]

Name: Harry Black

Its: City Manager

Date: 12/22/22

ATTEST:
for CLERK OF THE CITY OF STOCKTON
By [signature]

APPROVED AS TO FORM

By: [signature]

Name: Taryn Jones for

City Attorney

Date: 12/22/22

Attachment (1): Mariposa Industrial Project Enhanced Measures

1585908.7

6

L-49 cont'd

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

The Final EIR Mitigation Measures will be revised to include the following:
AMM AIR-1: Solar Power: Owners, operators or tenants shall include with the building permit application, sufficient solar panels to provide power for the operation's base power use at the start of operations and as base power use demand increases. Project sponsor shall include analysis of (a) projected power requirements at the start of operations and as base power demand increases corresponding to the implementation of the "clean fleet" requirements, and (b) generating capacity of the solar installation. AMM AIR -1 (continued): CDD shall verify the size and scope of the solar project based upon the analysis of the projected power requirements and generating capacity as well as the available solar panel installation space. The photovoltaic system shall include a battery storage system to serve the facility in the event of a power outage to the extent required by the 2022 or later California Building Standards Code. AMM AIR -1 (continued): In the event sufficient space is not available on the subject lot to accommodate the needed number of solar panels to produce the operation's base or anticipated power use, the applicant shall demonstrate how all available space has been maximized (e.g., roof, parking areas, etc.). Areas which provide truck movement may be excluded from these calculations unless otherwise deemed acceptable by the supplied reports. AMM AIR -1 (continued): The developer or tenant, or qualified solar provider engaged by the developer or tenant shall timely order all equipment and shall install the system when the City has approved building permits and the necessary equipment has arrived. The developer or tenant shall commence operation of the system when it has received permission to operate from the utility. The photovoltaic system owner shall be responsible for maintaining the system(s) at not less than 80% of the rated power for 20 years. At the end of the 20-year period, the building owner shall install a new photovoltaic system meeting the capacity and operational requirements of this measure, or continue to maintain the existing system, for the life of the project.

L-49
cont'd

1

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

EMM AIR-1: Prior to the issuance of the first building permit, the applicant/developer shall demonstrate compliance with the SJVAPCD Rule 9510 (Indirect Source Review) to reduce growth in both NOx and PM10 emissions, as required by SJVAPCD and City requirements.
AMM AIR-1: Architectural Coatings: Construction plans shall require that architectural and industrial maintenance coatings (e.g., paints) applied on the project site shall be consistent with a VOC content of <10 g/L. Developer or tenant is not expected to exercise control over materials painted offsite by a third party.
AMM AIR-3: Construction Worker Trip Reduction: Project construction plans and specifications will require contractor to provide transit and ridesharing information for construction workers.
AMM AIR-2: SJVAPCD Regulation VIII Compliance: Construction plans and specifications shall include a Dust Control Plan incorporating the applicable requirements of Regulation VIII, which shall be submitted to the SJVAPCD for review and approval prior to beginning construction in accordance with the requirements of Regulation VIII.
AMM AIR -2: Emission Standards for Heavy-Duty Trucks: The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/lessees are informed of all on-going operational responsibilities. The property owner/tenant/lessee shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on the project site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025 or when commercially available for the intended application, whichever date is later. A zero-emission vehicle shall ordinarily be considered commercially available if the vehicle is capable of serving the intended purpose and is included in California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, https://californiahvip.org/ or listed as available in the US on the Global Commercial Vehicle Drive to Zero inventory,

2

L-49
cont'd

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

https://globaldrivetozero.org/. The City shall be responsible for the final determination of commercial availability, based on all the facts and circumstances at the time the determination is made, and may (but is not required to) consult with the California Air Resources Board before making such final determination. In order for the City to make a determination that such vehicles are commercially unavailable, the operator must submit documentation from a minimum of three (3) EV dealers identified on the californiahvip.org website demonstrating the inability to obtain the required EVs or equipment needed within 6 months.

"Domiciled at the project site shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere)

Zero-emission heavy-duty trucks which require service can be temporarily replaced with model year 2014 or later trucks. Replacement trucks shall be used for only the minimum time required for servicing fleet trucks.

AMM AIR-3: Zero Emission Vehicles: The property owner/tenant/lessee shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of thefleet will be zero emission vehicles by December 31, 2027.

"Domiciled at the project site" shall mean the vehicle is either (i) parked or kept overnight at the project site more than 70% of the calendar year or (ii) dedicated to the project site (defined as more than 70% of the truck routes (during the calendar year) that start at the project site even if parked or kept elsewhere).

Zero-emission vehicles which require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles.

The property owner/tenant/lessee shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the project site.

3

L-49
cont'd

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

AMM AIR-4: Demonstrate Compliance with Clean Fleet Requirements: The applicant, property owner, tenant, lessee, or other party operating the facility (the "Operator") shall utilize the zero emission vehicles/trucks required to meet the "clean fleet" requirements in AMM AIR-2 (for Class 7 and 8 vehicles) and AMM AIR-3 (for Class 2 through 6 vehicles) above. Within 30-days of occupancy, the Operator shall demonstrate to the satisfaction of CDD staff, that the applicable clean fleet requirements are being met.

AMM AIR-4 (continued): In the event that vehicles/trucks are not commercially available for the intended application, the "clean fleet requirements" may be adjusted as minimally as possible by the CDD to accommodate the unavailability of commercially available vehicles/trucks.

AMM AIR 4 (continued) The City shall quantify the air pollution and GHG emissions resulting from any modification of this condition. Within 12 months of failing to meet a "clean fleet" requirement the property owner/tenant/lessee shall implement a Voluntary Emissions Reduction Agreement (VERA) providing pound for pound mitigation of the criteria pollutant, toxic air contaminants, and GHG emissions quantified by the City through a process that develops, funds, and implements emission reduction projects, with the Air District serving a role of administrator of the emission reduction projects and verifier of the successful mitigation effort. The VERA shall prioritize projects in the South Stockton and surrounding area. Property owner/tenant/lessee shall continue to fund the VERA each year in an amount necessary to achieve pound for pound mitigation of emissions resulting from not meeting the clean fleet requirements until the owner/tenant/lessee fully complies.

AMM AIR-4 (continued): The Operator shall implement the proposed measures after CDD review and approval. Any extension of time granted to implement this condition shall be limited to the shortest period of time necessary to allow for 100% electrification under the clean fleet requirements. The CDD staff may seek the recommendation of the California Air Resources Board in determining whether there has been a manufacturing disruption or insufficient vehicles/trucks commercially available for the intended application.

AMM AIR-4 (continued): Construction Meal Destinations: Project construction plans and specifications will require the contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.

4

L-49 cont'd

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

AMM AIR-5: Condition of Approved Compliance Report: The Operator shall submit a condition of approval compliance report within30 days of, but not later than, the following dates: December 31, 2023, December 31, 2025, and December 31, 2027. The report shall outline clean fleet requirements applicable at each report interval and include documentation demonstrating compliance with each requirement. The City shall consider each report at a noticed public hearing and determine whether the Operator has complied with the applicable clean fleet requirements. If the Operator has not met each 100% clean fleet requirement by December 31, 2027, then the Operator shall submit subsequent reports every year until the 100% clean fleet requirement is implemented. The City shall consider each subsequent report at a noticed public hearing and determinewhether the Operator has complied with the clean fleet requirements, including any minimal adjustments to the requirements by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks, as described in the previous paragraph. Notice of the above hearings shall be provided to all properties located within 1,000 feet of the project site and through the ASK Stockton list serve.

AMM AIR-5 (continued): After the 100% clean fleet requirement has been implemented and confirmed by the CDD, the Operator shall submit to the CDD an on-going compliance report every three years containing all necessary documentation to verify that the Operator is meeting the clean fleet requirements. At the time it confirms that the 100% clean fleet requirement has been implemented, the CDD will establish the due date for the first on-going compliance report. Each subsequent on-going compliance report shall be due within 30 days of, but not later than, the three-year anniversary of the preceding due date. The on-going compliance reports and accompanying documentation shall be made available to the public upon request.

AMM AIR-6: Zero Emission Forklifts, Yard trucks and Yard Equipment: Owners, operators or tenants shall require all forklifts, yard trucks, and other equipment used for on-site movement of trucks, trailers and warehoused goods, as well as landscaping maintenance equipment used on the site, to be electrically powered or zero-emission. The owner, operator or tenant shall provide on-site electrical charging facilities to adequately service electric vehicles and equipment

AMM AIR-7: Truck Idling Restrictions: Owners, operators or tenants shall be required to make their best effort to restrict truck idling onsite to a maximum of three minutes, subject to exceptions defined by CARB in the document: *commercial_vehicle_idling_requirements_July 2016*. Idling restrictions shall be enforced by highly-visible posting at the

L-49
cont'd

5

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

site entry, posting at other on-site locations frequented by truck drivers, conspicuous inclusion in employee training and guidance material and owner, operator or tenant direct action as required.
AMM AIR-8: Electric Truck Charging: At all times during project operation, owners, operators or tenants shall be required to provide electric charging facilities on the project site sufficient to charge all electric trucks domiciled on the site and such facilities shall be made available for all electric trucks that use the project site.
AMM AIR-9: Project Operations, Food Service: Owners, operators or tenants shall establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to operations employees.
AMM AIR-10: Project Operations, Employee Trip Reduction: Owners, operators or tenants shall provide employees transit route and schedule information on systems serving the project area and coordinate ridesharing amongst employees.
AMM AIR-11: Yard Sweeping: Owners, operators or tenants shall provide periodic yard and parking area sweeping to minimize dust generation
AMM AIR-12: Diesel Generators: Owners, operators or tenants shall prohibit the use of diesel generators, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards.
AMM AIR-13: Truck Emission Control: Owners, operators or tenants shall ensure that trucks or truck fleets domiciled at the project site be model year 2014 or later, and maintained consistent with current CARB emission control regulations.
AMM AIR-14: All tenant lease agreements for the project site shall include a provision requiring the tenant/lessee to comply with all applicable requirements of the MMRP, a copy of which shall be attached to each tenant/lease agreement.
AMM AIR-14 (continued): SmartWay: Owners, operators or tenants shall enroll and participate the in SmartWay program for eligible businesses
AMM AIR-15: Designated Smoking Areas: Owners, operators or tenants shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest property line.
AMM AIR 16: Project construction shall be subject to all adopted City building codes, including the adopted Green Building Standards Code, version July 2022 or later. Prior to the issuance of building permits, the applicant/developer

6

L-49
cont'd

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

shall demonstrate (e.g., provide building plans) that the proposed buildings are designed and will be built to, at a minimum, meet the Nonresidential Voluntary Measures of the California Green Building Standards code, Divisions A5.1, 5.2 and 5.5, including but not limited to the Tier 2 standards in those Divisions, where applicable, such as the Tier 2 advanced energy efficiency requirements as outlined under Section A5.203.1.2.
EMM AG-1: The project shall participate in and comply with the City's Agricultural Lands Mitigation Program, under which developers of the property shall contribute agricultural mitigation land or shall pay the Agricultural Land Mitigation Fee to the City.
The City and Applicant will revise the proposed Development Agreement to provide the following:
In the DA text and in Exhibit B, to clarify that cold storage facilities are prohibited on the site and transport refrigeration units (TRUs) may not enter the site. In the DA text provide that any future proposal to construct cold storage facilities on the site or to allow TRUs to enter the site would require an amendment to the Development Agreement that shall be deemed and processed as a Major Modification to the Development Agreement, an application to the City for a conditional use permit, and be subject to review under the California Environmental Quality Act and Stockton Municipal Code Chapter 16.168.
Section 8.3 of the DA will be revised as follows: **8.3 Mitigation Measures**. Developer agrees to and shall comply with all applicable mitigation measures attached hereto as Exhibit C and with all applicable mitigation measures in the MIP EIR, as described in the Mitigation Monitoring/Reporting Program approved by the City on _____, 2023. Developer shall include in all tenant lease agreements for the project site a provision requiring the tenant/lessee to comply with all applicable requirements of the measures in this Section 8.3, a copy of which shall be attached to each to each tenant/lease agreement. Section 10.1 of the DA will be revised as follows: **10.1 Annual Review**. As required by California Government Code Section 65865.1 and pursuant to Section 16.128.110 of the Development Agreement Ordinance, the City of Stockton Planning Commission shall review

7

L-49
cont'd

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

this Agreement and all actions taken pursuant to the terms of this Agreement with respect to the development of the Project every twelve (12) months at a duly-noticed public hearing to determine good faith compliance with this Agreement ("Annual Review"). Specifically, the Annual Review shall be conducted for the purposes of determining good faith compliance with the terms and/or conditions of this Agreement, including compliance with the mitigation measures in Section 8.3 of this Agreement. Each Annual Review shall also document the status of Project development. In the event the Planning Commission recommends modification or termination of this Agreement in connection with such Annual Review, the action to effectuate such modification or termination must be taken by City Council.	
In the DA text, to require the City to coordinate with the County to develop and install signage prohibiting non-emergency vehicle access to the project site from Clark Drive or Marfargoa Road. The Applicant will be responsible for the costs of the signage determined to be appropriate by the City and the County.	
In the text, to require the following: Construction plans shall include a 10-foot by 65-foot landscaped berm along the 623-lineal foot and 493-lineal foot portions of the west line of the site, located north and south of Marfargoa Road, which will be required by and shown on Exhibit B to the Development Agreement. Landscaping of the berm shall include fast-growing evergreen trees to provide maximum visual screening, as determined by a qualified landscape architect. Construction plans shall also include a 10-foot wall along the 881-lineal foot and 1,316-lineal foot portions of the west line of the site, located north and south of Clark Drive, which will be required by and shown on Exhibit B to the Development Agreement. Construction plans shall also identify a 60-foot "no truck" zone along the entire length of the west line of the site, which will be required by and shown on Exhibit B to the Development Agreement. Construction plans shall also identify and prohibit building construction within a setback area located a minimum of 300 feet from the property line of residential properties along Marfargoa Road and Clark Drive. Notwithstanding the foregoing, the stairwells of ancillary/accessory buildings may encroach into the 300-foot setback area.	
In the text, to provide that, prior to the issuance of a grading permit, the Applicant will provide $200,000 to a non-profit organization serving disadvantaged residents of San Joaquin County approved by the City's Community Development Director, to fund a program to reduce exposure to emissions and noise from vehicle and truck traffic and industrial operations, for residents located with within the geographic area bounded by Munford Avenue, Mariposa Road, Little John's Creek and the SR99 Frontage Road. The program may fund or reimburse home air filtration systems, HVAC	

L-49
cont'd

8

MARIPOSA INDUSTRIAL PROJECT
ENHANCED MEASURES

modifications, window replacements, weather stripping, or similar improvements; publicly available electric vehicle charging station(s); and/or air quality monitoring censors with publicly available real time data (such as PurpleAir censors).

L-49
cont'd

9

1584972.4

Attachment F:
State Attorney General Memorandum of Agreement

EXHIBIT 2 - MOU

MEMORANDUM OF AGREEMENT

This Memorandum of Agreement ("Agreement") is entered into by and between the City of Stockton ("City"), and Rob Bonta, Attorney General of California, on behalf of the People of the State of California ("Attorney General"), and it is dated and effective as of the date that the last Party signs ("Effective Date"). The City, and the Attorney General are referred to as the "Parties."

RECITALS

WHEREAS areas of the City, including south Stockton, have disproportionately suffered from the environmental impacts of industrial land uses located nearby residences and other sensitive receptors such as schools, parks, and hospitals. According to CalEnviroScreen, a tool used to identify communities exposed to high levels of pollution, south Stockton's neighborhoods are exposed to pollution burdens in the top 10% of all communities in California, with some communities registering in the top 1%.

WHEREAS because of the extremely high levels of air pollution to which this environmental justice community is disproportionately exposed, the California Air Resources Board (CARB) has designated the area of south Stockton to the northwest of the Project as a top priority for reductions in emissions and improvements in air quality under AB 617. In 2021, CARB approved Stockton's Community Emissions Reduction Program (CERP) after an extensive public process. The CERP includes projected investments of over $32 million in emission reduction incentives and a variety of other clean air projects in the south Stockton AB 617 community area and additional measures to reduce exposure to air pollution for sensitive receptors.

L-50

WHEREAS in recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development. California, with its ports, population centers, and transportation network, has found itself at the center of this trend.

WHEREAS in response to project applications consistent with this demand, the City has approved millions of square feet of warehouse and logistics space, substantial amounts of which have been or will be constructed in the south Stockton community.

WHEREAS the Attorney General has previously submitted letters to the City regarding concerns with significant environmental impacts being created by such warehouse and distribution facility projects, including the Sanchez Hoggan Annexation Project and the South Stockton Commerce Center Project.

WHEREAS the City seeks to minimize additional environmental impacts from new warehouse and distribution facility development sited in south Stockton and throughout the City.

WHEREAS the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq. and California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387, requires, amongst other things, that the City impose feasible mitigation measures on applicable projects to minimize any significant environmental impacts. The California Supreme Court has determined that CEQA requires a lead agency "to implement all mitigation measures unless those measures are truly infeasible." *Sierra Club v. Cty. of Fresno* (2018) 6 Cal.5th 502, 524–25 (citing *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945, 967).

WHEREAS on August 24, 2021, the City released the Draft Environmental Impact Report (EIR) for the Mariposa Industrial Park Project. Public comments submitted on the Draft EIR, including comments from the Attorney General's Office and the Sierra Club, raised concerns that the project's

1

significant environmental impacts were not sufficiently disclosed, analyzed, and mitigated as required by CEQA.

WHEREAS on February 28, 2022, the City released the Final EIR for the Mariposa Industrial Park Project. In response, once again stakeholders, including the Attorney General's Office and the Sierra Club, raised concerns regarding the project, including the lack of feasible mitigation as required under CEQA.

WHEREAS the City, the Attorney General's Office, and the Sierra Club have been engaged in good-faith negotiations regarding additional feasible mitigation measures to reduce the potentially significant environmental impacts that the Mariposa Industrial Park Project may create.

WHEREAS as a result of those good-faith negotiations the City has proposed to require additional feasible mitigation measures on the Mariposa Industrial Park Project to further reduce the project's significant environmental impacts, as identified in the amended Mariposa Industrial Park Final Environmental Impact Report ("Revised Final EIR" State Clearinghouse No. 2020120283). The City Council intends to soon consider adopting: (1) a Resolution certifying that Revised Final EIR together with the adoption of CEQA Findings including a Statement of Overriding Considerations and adoption of a Mitigation Monitoring and Reporting Program ("MMRP"); (2) an Ordinance for the Pre-Zoning of APNs 179-220-10, -12, -13, -16, -17, -18, -19, and -24 (the "Property") to Industrial, Limited; (3) an Ordinance for a Development Agreement; and (4) a Resolution authorizing the filing of an annexation application with the San Joaquin Local Agency Formation Commission (collectively the "Project Approvals").

L-50 cont'd

WHEREAS the City has embarked on a comprehensive update to Title 16 of the City's Municipal Code, known as the Development Code, that is intended to produce a user-friendly Development Code, serving as an effective tool to implement the General Plan, shape future growth, and help realize the community's vision of promoting investment in downtown Stockton and historically underserved areas, preserving and enhancing neighborhood character, and improving community health and safety. The City anticipates adopting and publishing a new updated Development Code in 2023.

WHEREAS the City seeks to establish an ordinance applicable to future warehouse and distribution facility development projects ("warehouse ordinance") in order to set minimum development standards to mitigate environmental impacts from those projects. Such a warehouse ordinance will also provide clarity to stakeholders, including developers and the general public, regarding the requirements needed to construct warehouse and distribution facilities in the City.

AGREEMENT

Either as part of the aforementioned ongoing Development Code amendment process or as a separate, stand-alone process, City staff shall propose a warehouse ordinance to identify and apply all feasible mitigation measures to qualifying warehouse and distribution facility projects to minimize their potentially significant environmental impacts. The proposed warehouse ordinance shall be scheduled for consideration by the City Council before December 31, 2023.

The warehouse ordinance proposed to the City Council shall apply to qualifying facilities engaged in logistics use, which is defined as any warehouse or wholesaling and distribution land use which entails facilities to be used for the storage of farm products, furniture, household goods, or other commercial goods of any nature for distribution to wholesalers and/or retailers, including cold storage. Qualifying facilities do not include self-storage or mini-storage facilities offered for rent or lease to the

general public. Qualifying facilities shall include, at minimum, projects with a building or buildings totaling 100,000 square feet or larger.

In preparing and proposing the warehouse ordinance, City staff shall consider including at minimum the conditions included in Exhibit A. To the extent that the conditions included in Exhibit A are not included in the warehouse ordinance proposed for approval by City Council, City staff shall explain: (1) why such conditions are infeasible as defined under CEQA; (2) what alternative conditions are being proposed for inclusion in-lieu of any such omitted conditions; and (3) how such alternative conditions reduce potentially significant environmental impacts.

If the City enters into this Agreement and adopts the Project Approvals, including all of the Mariposa Industrial Project Enhanced Measures attached to the City's and Developer's separate settlement agreement with the Sierra Club, then the Attorney General shall not file any complaints, claims, grievances, special proceedings, legal challenges, or take any other actions against the City with any state, federal, or local agency or court challenging the City Council's adoption of the Project Approvals or the proposed annexation of the Property to the City of Stockton (the "AG Obligation").

GENERAL TERMS AND CONDITIONS

1. Agreement Term. This Agreement shall remain in effect until the City implements and complies with the commitment pursuant to the agreed-on deadline set forth herein.
2. Default. The Parties agree and acknowledge that time is of the essence for City staff to propose and for the City Council to consider adopting a warehouse ordinance before the December 31, 2023, deadline set forth in this Agreement. The Parties stipulate that the Superior Court in and for San Joaquin County shall have jurisdiction over the Parties and this Agreement to enforce the provisions of the Agreement until performance in full of all terms of the Agreement. The Court shall have full authority to enforce the Agreement as if the Parties had entered the Agreement as a stipulated judgment pursuant to Code of Civil Procedure, section 664.6. Nothing in this Agreement prevents the Attorney General from seeking any and all remedies for non-compliance with the Agreement.
3. No Waiver. This Agreement does not in any way limit or waive the Attorney General's jurisdiction, capacity, authorization, obligation, right, or discretion to determine whether any City action or failure to act complies with CEQA or any other law except as expressly provided in the AG Obligation above.
4. Amendment. No addition to or modification of any term or provision of this Agreement will be effective unless set forth in writing and signed by an authorized representative of each of the Parties.
5. Signing Authority. By signing this Agreement, the persons executing the Agreement represent that they have the capacity and authority to execute the Agreement as the representative of their respective agency and to bind their respective agency to the terms of this Agreement.
6. Entire Agreement. This Agreement contains the entire agreement of the Parties with respect to the subject matter of this Agreement, and supersedes all prior negotiations, discussions, agreements, commitments, and understandings with respect thereto.
7. Applicable Law. This Agreement shall be governed by and construed in accordance with the laws of the State of California.
8. Joint Drafting. This Agreement has been jointly drafted, and the general rule that it be construed against the drafting party is not applicable.
9. Severability. If a court should find any term, covenant, or condition of this Agreement to be invalid or unenforceable, the remainder of the Agreement shall remain in full force and effect.

L-50 cont'd

10. Representation by Counsel. Each of the Parties affirmatively represents that it has been represented throughout this matter by attorneys of its own choosing. Each Party has read this Agreement and has had the terms used herein and the consequences thereof explained by its attorneys of choice. This Agreement is freely and voluntarily executed and agreed to by each Party after having been apprised of all relevant information and data furnished by its attorneys of choice. Each Party in executing this Agreement does not rely upon any inducements, promises, or representations made by any other Party except as set forth herein.
11. Counterparts and Electronic Signatures. This Agreement may be executed with counterpart signatures, each of which shall be deemed an original. The Agreement will be binding upon the receipt of original, facsimile, or electronically communicated signatures.

L-50 cont'd

DATED: December ___, 2022

ROB BONTA
Attorney General of California
CHRISTIE VOSBURG
Supervising Deputy Attorney General

_____
SCOTT LICHTIG
Deputy Attorney General
Attorneys for the People of the State of California

DATED: December ___, 2022

CITY OF STOCKTON

_____
HARRY BLACK
City Manager

EXHIBIT 2 - MOU

EXHIBIT A

In preparing and proposing the warehouse ordinance, City staff shall consider including at minimum the following conditions on qualifying facilities. To the extent that the following conditions are not included in the warehouse ordinance proposed for approval by City Council, City staff shall explain: (1) why such conditions are infeasible as defined under CEQA; (2) what alternative conditions are being proposed for inclusion in-lieu of any such omitted conditions; and (3) how such alternative conditions reduce potentially significant environmental impacts:

Construction Mitigation:

- San Joaquin Valley Air Pollution Control District (SJVAPCD) Regulation VIII Compliance: Construction plans and specifications shall include a Dust Control Plan incorporating the applicable requirements of Regulation VIII, which shall be submitted to the SJVAPCD for review and approval prior to beginning construction in accordance with the requirements of Regulation VIII.
- Construction Vehicles & Equipment:
    - The use of electric-powered, battery-powered, natural gas, or hybrid construction equipment and vehicles are required during construction if commercially available. If substantial evidence is provided by the permittee or its contractor that such equipment is not commercially available, including a description of commercially reasonable efforts to secure such equipment, diesel-powered construction equipment greater than 50 horsepower meeting the highest rated California Air Resources Board (CARB) Tier technology available at the time of construction may be used. Prior to permit issuance, the construction contractor shall submit an equipment list confirming equipment used is compliant with the highest CARB Tier at the time of construction. Equipment proposed for use that does not meet the highest CARB Tier in effect at the time of construction, shall only be approved for use at the discretion of Stockton's Community Development Department (CDD) and shall require proof from the construction contractor that, despite reasonable best efforts to obtain the highest CARB Tier equipment, such equipment was unavailable.
    - All off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during construction of the qualifying facility(ies) shall be electric powered.
    - Subject to all other idling restrictions, off-road diesel-powered equipment shall not be left in the "on position" for more than 10 hours per day.
- Owners, operators or tenants of qualifying facilities shall provide "cool roof" specifications in construction plans verifying that the proposed roof will utilize cool roofing materials with an aged reflectance and thermal emittance values that are equal to or greater than those specified in the current edition of the CALGreen Building Standards Code, Table A5.106.11.2.3 for Tier 1 and the City's Green Building Standards within Chapter 15.72 of the Stockton Municipal Code.
- Temporary electrical hookup to the construction yard and associated work areas shall be required.
- The idling of heavy construction equipment for more than 5 minutes shall be prohibited. The owners, operators or tenants shall provide verification that construction specifications establish a

L-50 cont'd

5

five-minute idling limit for all heavy-duty construction equipment utilized during construction of the proposed qualifying facility(ies). Signage shall be posted throughout the construction site regarding the idling time limit, and the construction contractor shall maintain a log for review. The log shall verify that construction equipment operators are advised of the idling time limit at the start of each construction day. Idling limits shall be noted in the construction specifications. The maintenance of logs documenting compliance shall be required.

- The construction contractors shall maintain on the construction site an inventory of construction equipment, maintenance records, and datasheets, including design specifications and emission control tier classifications.
- Architectural and industrial maintenance coatings (e.g., paints) applied on the qualifying facility(ies) shall be consistent with a VOC content of <10 g/L. Developer or tenant is not expected to exercise control over materials painted offsite by a third party.
- Qualifying facilities shall require the construction contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.
- Qualifying facilities shall require the construction contractor to provide transit and ridesharing information for construction workers.

Site Design:

L-50 cont'd

- Qualifying facilities shall be constructed in compliance with the most current edition of all adopted City building codes, including the adopted Green Building Standards Code. Prior to the issuance of building permits, the applicant/developer of the qualifying facility(ies) shall demonstrate (e.g., provide building plans) that the proposed buildings are designed and will be built to, at a minimum, meet the Tier 2 advanced energy efficiency requirements of the Nonresidential Voluntary Measures of the California Green Building Standards code, Divisions A5.1, A5.2 and A5.5, Energy Efficiency as outlined under Section A5.203.1.2.
- Qualifying facilities and their associated loading docks must be located no closer than 300 feet from sensitive receptors, and the City staff should consider the public health and safety benefits of requiring a larger buffer, up to 1,000 ft. All such setbacks will be measured from the loading dock or any building edge, whichever is closer, to the property line of any nearby sensitive receptors using the straight-line method. The setbacks and buffers required in this ordinance shall prevail over any less-stringent standards in the City's Development Code. Sensitive receptor shall be defined as any residence including private homes, condominiums, apartments, and living quarters, schools, preschools, daycare centers, correctional facilities, parks/recreation facilities, in-home daycares, and health facilities such as hospitals, long term care facilities, retirement and nursing homes.
- Qualifying facilities must include an onsite landscaped buffer, measured from the property line of all adjacent sensitive receptors. The width of the buffer shall be proportionate to the height of the warehouse building with specified minimums as set forth below unless infeasible. Landscaping shall be installed at the periphery of the qualifying facility(ies) site along adjacent rights of way and the landscaping buffer area shall not include the right of way itself. Landscape buffers shall not be required on interior boundaries of the qualifying facility(ies).

6

- The width of the buffer shall be set at a 2:1 ratio for all warehouses–for every 1 foot of building height, the buffer shall be 2 feet. The landscaping portion of this buffer shall not be less than 50% of this buffer, but may include areas to be used for bioswales, retention/detention areas and/or other stormwater and water quality management areas.
- The buffer area(s) shall include, at a minimum, a solid decorative wall(s) adjacent to sensitive receptors, natural ground landscaping, and solid screen buffering trees, as described below, unless there is an existing solid block wall. Onsite buffer areas shall not include deceleration lanes or right-turn lanes. To the extent allowed by other applicable City codes, policies and regulations the height of the decorative wall shall be at least 14 feet, except in buffer areas adjacent to sensitive receptors. For areas adjacent to sensitive receptors, the decorative wall shall be a minimum of 14 to 18 feet to the extent otherwise permitted by city codes, policies and regulations.
- Trees shall be used as part of the solid screen buffering treatment. Trees used for this purpose shall be evergreen, drought tolerant, and shall be spaced in two rows along the length of the buffer, with trees in each row offset, and each tree no greater than 15 feet on center. Spacing up to 20 feet may be allowed if wide canopy trees are used sufficient to create wall of vegetation that filters warehouse pollution. The property owner, tenant, operator, and any successors in interest shall maintain these trees for the duration of ownership, ensuring any unhealthy or dead trees are replaced with a similar tree as soon as possible.
- All landscaping shall be drought tolerant, and to the extent feasible, species with low biogenic emissions. Palm trees shall not be utilized.
- All landscaping areas shall be properly irrigated for the life of the qualifying facility(ies) to allow for plants and trees to maintain growth with no undue pruning.

L-50 cont'd

Operational Mitigation

- Solar Power/Battery Energy Storage Systems:
  - The building permit application for qualifying facilities must demonstrate sufficient solar panels to provide power for the operation's base power use at the start of operations and as base power use demand increases. The application shall include analysis of plans to meet (a) projected power requirements at the start of operations and as base power demand increases corresponding to the implementation of the "clean fleet" requirements, and (b) generating capacity of the solar installation.
  - The photovoltaic system(s) shall include a battery energy storage system to serve the qualifying facility(ies) in the event of a power outage to the extent required by the most current edition of the California Building Standards Code.
  - Stockton's Community Development Department (CDD) shall verify the size and scope of the solar project based upon the analysis of the projected power requirements and generating capacity as well as the available solar panel installation space.
  - In the event sufficient space is not available on the subject lot to accommodate the needed number of solar panels to produce the operation's base or anticipated power use, the applicant of the qualifying facility(ies) shall demonstrate how all available space has

7

been maximized (e.g., roof, parking areas, etc.) for photovoltaic and battery energy storage system use. Areas which provide truck movement may be excluded from these calculations unless otherwise deemed acceptable by the supplied reports and applicable building standards.

- The owners, operators or tenants, or qualified solar system contractor engaged by the developer or tenant, shall install the system when the City has approved building permits and the necessary equipment has arrived. The tenant/operator of the qualifying facility(ies) shall commence operation of the system only when it has received permission to operate from the utility. The photovoltaic system owner shall be responsible for maintaining the system(s) at not less than 80% of the rated power for 20 years. At the end of the 20-year period, the owners, operators or tenants shall install a new photovoltaic system meeting the capacity and operational requirements of this measure, or continue to maintain the existing system, for the life of the qualifying facility(ies).

- Electric Vehicles (EV): The following mitigation measures shall be implemented during all on-going business operations and shall be included as part of contractual lease agreement language to ensure the tenants/operators of the qualifying facility(ies) are informed of all on-going operational responsibilities.

  - Heavy-Duty EV Trucks: The property owners, operators or tenants of the qualifying facility(ies) shall ensure that all heavy-duty trucks (Class 7 and 8) domiciled on site are model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2025, or when commercially available for the intended application, whichever date is later.

  - Medium-Duty EV Vehicles: The property owners, operators or tenants of the qualifying facility(ies) shall utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled on site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2023, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2025, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2027.

  - "Domiciled on site" shall mean the vehicle is either (i) parked or kept overnight at the qualifying facility(ies) more than 70% of the calendar year or (ii) dedicated to the qualifying facility(ies) site (defined as more than 70% of the truck routes during the calendar year that start at the qualifying facility(ies) site even if parked or kept elsewhere). The tenant/operator of the qualifying facility(ies) shall not be responsible to meet "clean fleet" requirements for vehicles used by common carriers operating under their own authority that provide delivery services to or from the qualifying facility(ies) site.

  - Zero-emission vehicles which require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles.

L-50 cont'd

8

- A zero-emission vehicle shall ordinarily be considered commercially available if the vehicle is capable of serving the intended purpose and is included in California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, https://californiahvip.org/ or listed as available in the US on the Global Commercial Vehicle Drive to Zero inventory, https://globaldrivetozero.org/. The City shall be responsible for the final determination of commercial availability, based on all the facts and circumstances at the time the determination is made. In order for the City to make a determination that such vehicles are commercially unavailable, the operator must submit documentation from a minimum of three (3) EV dealers identified on the californiahvip.org website demonstrating the inability to obtain the required EVs or equipment needed within 6 months.
- The tenant/operator of the qualifying facility(ies) shall utilize the zero emission vehicles/trucks required to meet the "clean fleet" requirements. Within 30 days of issuance of the final certificate of occupancy, the tenant/operator shall demonstrate to the satisfaction of CDD staff, that the applicable clean fleet requirements are being met. In the event that there is a disruption in the manufacturing of zero emission vehicles/trucks or that sufficient vehicles/trucks are not commercially available for the intended application, the "clean fleet requirements" may be adjusted as minimally as possible by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks.
- The tenant/operator of the qualifying facility(ies) shall implement the proposed measures after CDD review and approval. Any extension of time granted to implement this condition shall be limited to the shortest period of time necessary to allow for 100% electrification under the clean fleet requirements. The CDD staff may seek the recommendation of the California Air Resources Board in determining whether there has been a manufacturing disruption or insufficient vehicles/trucks commercially available for the intended application.
- Within 12 months of failing to meet a "clean fleet" requirement, the tenant/operator of the qualifying facility(ies) shall implement a Voluntary Emissions Reduction Agreement (VERA) providing pound for pound mitigation of the criteria pollutant, toxic air contaminants, and GHG emissions quantified by the City through a process that develops, funds, and implements emission reduction projects, with the Air District serving a role of administrator of the emission reduction projects and verifier of the successful mitigation effort. The VERA shall prioritize projects in the area surrounding the new qualifying facility(ies). The tenant/operator shall continue to fund the VERA each year in an amount necessary to achieve pound for pound mitigation of emissions resulting from not meeting the clean fleet requirements until the owner/tenant/lessee fully complies.

L-50 cont'd

- At all times during operation, and to the extent the applicable utility authorizes and has capacity to support, the tenant/operator of the qualifying facility(ies) shall be required to provide electric charging facilities on site sufficient to charge all electric trucks domiciled on the site, and such facilities shall be made available for all electric trucks that use the qualifying facility(ies).
- The tenant/operator of the qualifying facility(ies) shall require all forklifts, yard trucks, and other equipment used for on-site movement of trucks, trailers and warehoused goods, as well as landscaping maintenance equipment used on the site, to be electrically powered or zero-emission.

9

The tenant/operator shall provide on-site electrical charging facilities to adequately service such electric vehicles and equipment.

- EV Compliance Reporting:
    - The tenant/operator of the qualifying facility(ies) shall procure the zero emission vehicles/trucks required to meet the "clean fleet" requirements above. Within 30 days of issuance of the final certificate of occupancy, the tenant/operator shall submit a condition of approval compliance report outlining compliance with each clean fleet requirement applicable and including documentation demonstrating compliance with each requirement. The tenant/operator shall submit similar reports every two years thereafter until full compliance with the applicable clean fleet requirements is achieved. The City shall consider each report at a noticed public hearing and determine whether the tenant/operator has complied with the applicable clean fleet requirements. If the tenant/operator has not met each 100% clean fleet requirement by December 31, 2027, then the tenant/operator shall submit reports annually until the 100% clean fleet requirement is implemented. The City shall consider each subsequent report at a noticed public hearing and determine whether the Operator has complied with the clean fleet requirements, including any minimal adjustments to the requirements by the CDD to accommodate the manufacturing disruption or unavailability of commercially available vehicles/trucks, as described above. Notice of the above hearings shall be provided to all properties located within 1,000 feet of the qualifying facility(ies) site and through the ASK Stockton list serve.
    - After the 100% clean fleet requirement has been implemented and confirmed by the CDD, the tenant/operator shall submit to the CDD an on-going compliance report every three years containing all necessary documentation to verify that the clean fleet requirements are being met. At the time it confirms that the 100% clean fleet requirement has been implemented, the CDD will establish the due date for the first on- going compliance report. Each subsequent on-going compliance report shall be due within 30 days of, but not later than, the three-year anniversary of the preceding due date. The on-going compliance reports and accompanying documentation shall be made available to the public upon request
- For qualifying facilities at which cold storage and associated transport refrigeration units (TRUs) are proposed or may be a future use, unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide cold storage, a conduit shall be installed during construction of the building shell from the electrical room to 100% of the loading dock doors that have potential to serve the refrigerated space. If tenant improvement building permits are issued for any such cold storage space, electric plug-in units shall be installed at every dock door servicing the cold storage space to allow TRUs to plug in and truck operators with TRUs shall be required to utilize the electric plug-in units when at loading docks serving such refrigerated space.
- Prior to the issuance of the first building permit, the applicant/developer shall demonstrate compliance with the SJVAPCD Rule 9510 (Indirect Source Review) to reduce growth in both NOx and PM10 emissions, as required by SJVAPCD and City requirements.

L-50 cont'd

10

- The tenant/operator of the qualifying facility(ies) shall enroll and participate the in SmartWay program for eligible businesses.
- Truck Routes and Ingress/Egress:
    - Entry gates into the loading dock/truck court area of the qualifying facility(ies) shall be sufficiently positioned to ensure all trucks and other vehicles are contained onsite and inside the property line. Queuing, or circling of vehicles, on public streets immediately pre- or post-entry to an industrial commerce facility is strictly prohibited unless queuing occurs in a deceleration lane or right turn lane exclusively serving the qualified facility(ies).
    - Applicants shall submit to the CDD, and obtain approval of, all turning templates to verify truck turning movements at entrance and exit driveways and street intersection adjacent to industrial buildings prior to entitlement approval. Unless not physically possible, truck entries shall be located on collector streets (or streets of a higher commercial classification), and vehicle entries shall be designed to prevent truck access on streets that are not collector streets (or streets of a higher commercial classification), including, but not limited to, by limiting the width of vehicle entries.
    - Prior to issuance of certificate of occupancy, the tenant/operator of the qualifying facility(ies) shall establish and submit for approval to the CDD a truck routing plan to and from the State Highway System based on the City's latest Truck Route Map. The plan shall describe the operational characteristics of the use of the tenant/operator, including, but not limited to, hours of operations, types of items to be stored within the building, and proposed truck routing to and from the proposed facility(ies) to designated truck routes that avoids passing sensitive receptors, to the greatest extent possible. The plan shall include measures, such as signage and pavement markings, queuing analysis and enforcement, for preventing truck queuing, circling, stopping, and parking on public streets. The tenant/operator shall be responsible for enforcement of the plan. A revised plan shall be submitted to the CDD prior to a business license being issued by the City for any new tenant/operator of the property. The CDD shall have discretion to determine if changes to the plan are necessary including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility(ies). Signs and drive aisle pavement markings shall clearly identify the onsite circulation pattern to minimize unnecessary on-site vehicular travel.
    - The tenant/operator of the qualifying facility(ies) shall post signs, that may be required by the City, in prominent locations inside and outside of the building indicating that off-site parking for any employee, truck, or other operation related vehicle is strictly prohibited. City may require facility operator to post signs on surface or residential streets indicating that off-site truck parking is prohibited by City ordinance and/or the Truck Routing Plan.
    - Signs shall be installed, as required by the City, at all qualifying facility(ies) truck exit driveways directing truck drivers to the truck route as indicated in the Truck Routing Plan and State Highway System.
    - Upon commencement of operations, the tenant/operator of the qualifying facility(ies) shall be required to restrict truck idling onsite to a maximum of three minutes, subject to exceptions defined by CARB's commercial vehicle idling requirements. The facility must

L-50 cont'd

11

post highly-visible signs identifying these idling restrictions at the site entry and at other on-site locations frequented by truck drivers and include these restrictions in employee training and guidance material.

- Signs at the qualifying facility(ies) shall be installed, as required by the City, in public view with contact information for a local designated representative who works for the facility(ies) operator and who is designated to receive complaints about excessive dust, fumes, or odors, and truck and parking complaints for the site, as well as contact information for the San Joaquin Valley Air Pollution Control District's on-line complaint system and its complaint call-line: 1-800-281-7003. Any complaints made to the facility(ies) operator's designee shall be answered within 72 hours of receipt.

- Workforce-Related Mitigation:
  - Prior to issuance of occupancy permits, the applicant/developer shall demonstrate to the satisfaction of the City, that the proposed parking areas for employee passenger automobiles are designed and will be built to accommodate EV charging stations, at no cost to employees. At minimum, the parking areas and the number of EV charging stations for employee passenger automobiles shall equal the Tier 1 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.1.
  - Prior to issuance of occupancy permits, the applicant/developer shall demonstrate to the satisfaction of the City, that the proposed parking areas for passenger automobiles are designed and will be built to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces for passenger automobiles shall equal the Tier 1 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.1.1.
  - The tenant/operator of the qualifying facility(ies) shall establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to operations employees.
  - The tenant/operator of the qualifying facility(ies) shall provide employees transit route and schedule information on systems serving the qualifying facility(ies) area and coordinate ridesharing amongst employees.
  - Designated Smoking Areas: The tenant/operator of the qualifying facility(ies) shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest property line.
- Yard Sweeping: Owners, operators or tenants of the qualifying facility(ies) shall provide periodic yard and parking area sweeping to minimize dust generation
- Diesel Generators: Owners, operators or tenants of the qualifying facility(ies) shall prohibit the use of diesel generators, except in emergency situations (including when the utility delays a facility's new electrical service connection), in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards.

L-50 cont'd

12

EXHIBIT 2 - MOU

Additional Mitigation

- To the extent a qualifying facility seeks and secures a Development Agreement with/from the City, the applicant, or its successor in interest, and the City shall comply with Government Code section 65865.1 and Stockton Development Code section 16.128.110. The City shall schedule a public hearing at the Planning Commission, with notice to all affected parties, at least every 12 months after approval of the Development Agreement, to receive and discuss the annual report on the status of the qualifying facility(ies)'s compliance with the Development Agreement. At those same hearings, the City shall review all the qualifying facility(ies)'s mitigation measures and conditions of approval for compliance.

- Applicants seeking one or more discretionary permits for proposed qualifying facility(ies) shall engage in a community outreach effort to engage the existing community in determining issues of concern that can be addressed through site design and other means during the land use entitlement process. Suggested outreach efforts include but are not limited to, hosting community meetings, making presentations at advisory and community councils, and hosting job fairs.

L-50 cont'd

13

Response to Letter L: Shute Mihaly & Weinberger

Response L-1: The commentor states that some of the Recirculated Draft EIR includes inadequate analysis and mitigation measures that were included in the original Draft EIR. Please see Responses L-2 through L-27 for responses to the specific concerns raised in the body of the comment letter.

Response L-2: This comment serves as an introduction to the comment letter. The comment states that the General Plan designation is Agriculture; while that is true of the County General Plan, the property lies within the Sphere of Influence of the City of Tracy, and the City General Plan designates the site as Industrial.

Response L-3: Detailed responses to each of the commentor's individual comments relating to the air quality and greenhouse gas emissions topics are provided in the comment responses L-4 through L-27, below. The commentor attached its comment on the original Draft EIR to the comment letter on the Recirculated Draft EIR. That earlier comment letter is included within this document as Letter A and is responded to in full.

Response L-4: Detailed responses to each of the individual comments, reflective of this overall comment, are provided in Response L-5 through L27, below). This document adds many new mitigation measures to lessen the air quality and GHG impacts of the Project. See Chapter 3, Revisions to the Draft EIR, for such mitigation measures.

Response L-5: As provided in RDEIR Section 2.0: Project Description, and within RDEIR Section 3.3: Air Quality, the Project applicant has committed to a wide range of Project sustainability features. Moreover, in response to this comment and the applicant's commitments, an additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. Specifically, the following changes have been made to pages 3.3-32 through 3.3-35 of Section 3.3: Air Quality (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.):

> MITIGATION MEASURE(S)
>
> ***Mitigation Measure 3.3-1:*** *During Project operation, operators of heavy-duty trucks that travel to and from the Project site are required to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment.*
>
> ***Mitigation Measure 3.3-2****: The Project applicant shall supply 100% of project electricity from renewable sources. The Project applicant shall procure power from a combination of onsite solar generation and direct source renewable purchased energy; however, at no time shall the Project site be supplied with any greater than 3.4 megawatts of direct source renewable purchased energy.*
>
> ***Mitigation Measure 3.3-3****: Upon Project opening, the Project applicant shall generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site.*

Such facilities may include solar photovoltaic panels on the roofs of the buildings or elsewhere on site (e.g., awnings, canopies or "solar trees" in parking area).

***Mitigation Measure 3.3-4**: The Project shall be designed and constructed to allow future expansion of solar facilities on site as electricity demand increases. The Project applicant shall, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.*

***Mitigation Measure 3.3-5**: The Project applicant shall ensure that no natural gas service shall be supplied to the site.*

***Mitigation Measure 3.3-6**: The Project applicant shall ensure that diesel generators shall not be used on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.*

***Mitigation Measure 3.3-7**: The Project applicant shall ensure that, during Project operation, for trucks owned or operated by Costco that access the site, only ultra-low sulfur diesel fuel or biodiesel blended with sulfur content of 15 ppm or less shall be used, so long as such fuel is commercially available.*

***Mitigation Measure 3.3-8**: The Project applicant shall install and maintain perimeter landscaping that includes vegetation and a tree canopy (which may include structural solar canopies).*

***Mitigation Measure 3.3-9**: The Project applicant shall ensure the Project building(s) exceeds applicable Title 24 Building Envelope Energy Efficiency Standards by at least 1%.*

***Mitigation Measure 3.3-10**: The Project applicant shall install Energy Star certified appliances or equivalent.*

***Mitigation Measure 3.3-11**: The Project applicant shall install energy efficient lighting that meets or exceeds Title 24 requirements.*

***Mitigation Measure 3.3-12**: The Project applicant shall install roofs with a reflectivity factor of at least 78 to the extent that such roofs do not interfere with photovoltaics installed on roofs.*

***Mitigation Measure 3.3-13**: The Project applicant shall ensure that construction plans require that architectural and industrial maintenance coatings (e.g., paints) applied on the Project site shall be consistent with a VOC content of <50 g/L. However, the Project applicant shall not be expected to exercise control over materials painted offsite by a third party.*

***Mitigation Measure 3.3-14**: The Project applicant shall devise and implement a property maintenance plan during Project operation that includes sweeping parking lots regularly to remove road dust, tire wear, brake dust, and other contaminants.*

***Mitigation Measure 3.3-15**: The Project applicant shall Install High Efficiency MERV filters within the HVAC systems.*

***Mitigation Measure 3.3-16**: The Project applicant shall install a separate employee parking area accessible by its own curb cut entry and a flashing lit sidewalk that connects the employee parking with the buildings.*

Mitigation Measure 3.3-17*: The Project applicant shall provide bicycle parking for employee bicycles at the front entry of each building. Bicycle parking shall be secure and shall be located indoors or be covered. Provide locker/shower facilities for employees who commute via bicycle.*

Mitigation Measure 3.3-18*: The Project applicant shall provide electrical outlets for charging of employee e-bikes.*

Mitigation Measure 3.3-19*: The Project applicant shall provide no more than the minimum number of parking spaces required by City code.*

Mitigation Measure 3.3-20*: The Project applicant shall participate in an existing, agency-run employee rideshare program, such as dibs by the San Joaquin Council of Government or another similar program, and promote ridesharing among its employees.*

Mitigation Measure 3.3-21*: The Project applicant shall provide food and drink service for sale onsite to provide meal options to operations employees in a consistent manner.*

Mitigation Measure 3.3-22*: The Project applicant shall take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site shall be required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.*

Mitigation Measure 3.3-23*: The Project applicant shall train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.*

Mitigation Measure 3.3-24*: The Project applicant shall Designate efficient truck routes for trucks owned and operated by Costco.*

Mitigation Measure 3.3-25*: The Project applicant shall ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) shall be electric or zero-emission vehicles. The Project applicant shall provide on-site electrical charging facilities to adequately service such electric vehicles.*

Mitigation Measure 3.3-26*: The Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).*

Mitigation Measure 3.3-27*: The Project applicant shall ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs).*

Mitigation Measure 3.3-28*: The Project applicant shall provide priority parking for employee carpool vehicles.*

Mitigation Measure 3.3-29*: The Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.*

Mitigation Measure 3.3-30*: The Project applicant shall ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines.*

Mitigation Measure 3.3-31*: The Project applicant shall provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators shall be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%.*

Mitigation Measure 3.3-32*: The Project applicant shall ensure that heavy-duty diesel hauling trucks that access the Project site for construction shall be model year 2010 or newer, so long as such trucks are reasonably available.*

Mitigation Measure 3.3-33*: The Project applicant shall prepare and implement a construction traffic control plan during the Project's construction phase.*

Mitigation Measure 3.3-34*: The Project applicant shall, during construction, install signage on any unpaved primary construction accessways onsite on the project site to limit vehicle speeds to no more than 15 mph.*

Mitigation Measure 3.3-35*: Project construction plans and specifications shall require the contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide food service in a consistent manner.*

Mitigation Measure 3.3-36*: The Project applicant shall employ the following strategies during construction to minimize noise:*

(a) Concrete delivery vehicles shall have low frequency back up beepers that meet Cal-OSHA requirements.

(b) All fleet equipment shall have mufflers and noise-minimizing devices.

(c) Personal radios shall not be allowed onsite.

Furthermore, it should be noted that the RDEIR also includes additional TDM measures that would reduce vehicle trips. Such reductions would also reduce air quality and greenhouse gases, given that any reduction in employee trips would also reduce air quality and GHG emissions.

Response L-6: In contrast to the commentor's statement, the proposed Project would not conflict with the City's Sustainability Action Plan, as described on page 3.7-36 of the RDEIR. Moreover, the analysis provided throughout Section 3.7: Greenhouse Gases, Climate Change, and Energy describes how the Project would in fact be consistent with the State's fair share contribution to GHG impacts. The commentor's claim that a "net zero" threshold should be established for the Project is baseless. Specifically, a "net zero" threshold is not set forth within any of the state or SJVAPCD suggested thresholds; lead agencies have flexibility to employ the thresholds they believe are appropriate; lastly, the threshold used here was specifically embraced within the cited *Center for Biological Diversity v. California Dept. of Fish & Wildlife (2015) 62 Cal.4th 204 ("Newhall Ranch")* case.

Additionally, it should be noted that Executive Order 55-18 is referenced within the RDEIR, on pages 3.7-11 and 3.7-12 of Chapter 3.7 of the RDEIR.

As provided in RDEIR Section 2.0: Project Description, and within RDEIR Section 3.3: Air Quality, the Project has committed to a wide range of Project sustainability features. Moreover, in response to the applicant's commitments and this comment, an additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. See Chapter 3 of this document and Response L-5.

Response L-7: As described on page 3.7-21 of the RDEIR, the sustainability measures included with the City of Tracy Sustainability Action Plan (SAP) do not apply directly to land use projects, in contrast to the commentor's claim. As stated on the City's website[13], the City of Tracy SAP provides Tracy with a guide to reduce GHG emissions, reduce consumption of nonrenewable resources, improve public health, promote economic vitality, implement the General Plan, and engage residents. However, as also stated on the City's website[14]:

> *"State regulations now require new development to account for its impact to the environment, specifically in terms of GHG emissions and impact on ecosystems. Mitigating impacts in these areas on a project by project basis is often difficult, costly, and time-consuming. The Sustainability Action Plan considers impacts of future development on a citywide level and provides a framework for addressing mitigation of such impacts. This strategy effectively streamlines the development process by relieving individual projects of the task to develop their own impacts analyses and mitigation measures."*

That is, the sustainability measures included in the SAP do not apply to individual projects; rather, they apply to the City, and require the City to implement standalone policies (e.g., zoning code amendments) which, if adopted, then apply to individual projects. Moreover, the Project would not conflict with the City of Tracy SAP.

Response L-8: An additional mitigation measure has been added to Section 3.3: Air Quality of the Recirculated Draft EIR, to require more than just two (2) installed EV spaces. Specifically, Mitigation Measure 3.3-29 requires that the Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls. Additionally, Mitigation Measure 3.3-26 has been added to the Recirculated Draft EIR, and it requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit must be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations). Specifically, the following changes have been

[13] See: https://www.cityoftracy.org/our-city/departments/planning/sustainability-action-plan

[14] See: https://www.cityoftracy.org/our-city/departments/planning/sustainability-action-plan

made to page 3.3-34 of Section 3.3: Air Quality (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.):

> ***Mitigation Measure 3.3-26****: The Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).*
>
> ***Mitigation Measure 3.3-29****: The Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.*

Response L-9: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. Specifically, the changes have been made to pages 3.3-32 through 3.3-35 of Section 3.3: Air Quality. Furthermore, it should be noted that the RDEIR also includes additional TDM measures that would reduce vehicle trips. Such reductions would also reduce air quality and greenhouse gases, given that any reduction in employee trips would also reduce air quality and GHG emissions. See Response L-5.

The comment suggests that the Project has high GHG emissions, however, there is no adopted threshold to provide that measure to classify the Project's GHG emissions as high. GHG emissions associated with Global Climate Change in a technical consideration should be considered in the context of the global GHG emissions, and in that comparison, this Project's GHG emissions would be considered small and insignificant. In the absence of an adopted bright line significance threshold, the RDEIR has relied upon an accepted approach to assess the significance of GHG emissions for CEQA. Thus, the premise that this Project's GHG emissions preclude it from being less significant has no fundamental basis. The RDEIR approach assesses consistency with the state's GHG reduction goals, including those associated with the latest version of the CARB's Scoping Plan, and the SJCOG's 2022 RTP/SCS. Specifically, as long as a Project demonstrates consistency with these and any other applicable GHG plans and policies, a Project would be considered to have a less-than-significant impact associated with GHGs. A Project that may result in an increase in GHG emissions each year does not necessarily indicate a significant GHG impact under CEQA.

Overall, as stated in Section 3.7 of the RDEIR, the proposed Project would be consistent with relevant plans, policies, and regulations associated with GHGs, notably the most recent version of the CARB's Scoping Plan, and the SJCOG's 2022 RTP/SCS. This would ensure that the proposed Project would be consistent with, and would not impair, the State's carbon neutrality standard by year 2045 as established under AB 1279. Since the Project would be consistent with State GHG Plans, it would not impede the State's goals of reducing GHG emissions 40 percent below 1990 levels by 2030, and of achieving carbon neutrality by 2045. The proposed Project would make a reasonable fair share contribution to the State's GHG reduction goals, by implementing a wide array of Project features, as

well as a wide array of GHG-related mitigation measures, that would reduce GHG emissions and therefore the proposed Project's GHG emissions would be considered to have a less than significant impact. The fact that a development project would increase GHGs in comparison to the existing scenario does not preclude a Project from being deemed consistent with the CARB's Scoping Plan, and the SJCOG's 2022 RTP/SCS.

Response L-10: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. Specifically, the changes have been made to pages 3.3-32 through 3.3-35 of Section 3.3: Air Quality (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.). See Response L-5.

Response L-11: With regard to the trip type percentages, given that trip lengths were made the same length for the purposes of modeling (note: trip lengths were determined to be a weighted average distance of 21.37224776 miles, based on the default trip distances for passenger vehicles of 17.75 miles and the assumed conservative estimate of a 29 mile distance for heavy-duty truck trips, weighted by total trips per vehicle type), differentiating trip types based on vehicle types per the commentor's suggestion would not change the numerical results of the analysis whatsoever. Reason being, the different trip types were already accounted for by the model via other means (specifically, via the fleet mix parameter, consistent with the data provided by the traffic consultant, Kimley-Horn and Associates). Therefore, the trip type percentages identified by the commentor were not included within the model since they do not affect the modeling outputs one way or the other, as the appropriate emissions results are mathematically accounted for within the model via the fleet mix parameter. Attempting to differentiate trip types based on vehicle types, as suggested by the commentor, would overcomplicate the modeling and not result in a different mathematical or modeling outcome.

Response L-12: An AIA is not required to be conducted at this point in time, and must only be submitted prior to the project's final discretionary approval. The applicant has submitted an AIA application to SJVAPCD, and is actively working with the District to process this application. As explained in the RDEIR, the Rule 9510 process is required by law and thus must and will be followed. CEQA review assumes that the applicant will indeed adhere to the law. There is no requirement that the AIA report for the Rule 9510 process be completed and reflected within an EIR for a proposed project. The EIR contains a fulsome and comprehensive air emissions analysis such that no other study is warranted or needed. Nevertheless, the AIA application process has already been started and is ongoing.

Response L-13: The reduction of 33.3% of the Project's operational NOx emissions is not acting as a mitigation measure in itself for this Project. Rather, this33.3% reduction of the Project's operational NOx emissions is required by Rule 9510, and therefore would be required to be achieved (for the Project to be allowed to be developed at all). This 33.3% reduction can be achieved through a combination of either on-site reductions and/or through fees paid to the Air District to fund off-site improvements.

The 33.3% reduction can be met in a variety of ways, including by accounting for the various mitigation measures associated with the Project (including those mitigation measures that were not quantified within the RDEIR itself, due to the difficulty in modeling the emissions reductions that would be associated with implementation of Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36). It should be noted that an additional 35 air quality-related mitigation measures have been added to the RDEIR as part of the Final EIR. Many of these additional mitigation measures would help the Project achieve such a reduction. The RDEIR is not required to evaluate the feasibility of reducing NOx emissions by 33.3%, as this is a requirement of Rule 9510 (through a combination of on-site mitigation and/or fees to fund off-site emissions reductions), which applies separate and apart from the CEQA process. That is, the Project would not be allowed to be developed without consistency with Rule 9510. Therefore, assuming that the Project would meet the requirements of Rule 9510 (i.e., a 33.3% reduction in the Project's operational NOX emissions, through a combination of on-site measures and/or off-site fees) is appropriate. Additionally, the Project applicant has prepared and submitted an AIA application to SJVAPCD to meet the requirements of Rule 9510.

Response L-14: As described on page 2.0-9 of the Recirculated Draft EIR Chapter 2.0: Project Description, the Project intends to supply 100 percent of its electricity demand from renewable sources associated with a combination of onsite generation and direct source renewable purchased energy. Costco has specifically entered into direct source renewable purchase contracts sufficient to supply these needs. Moreover, the Project would not use any natural gas. The analysis contained within the Recirculated Draft EIR provides a conservative analysis of the Project's energy impacts. Furthermore, crucially, additional disclosure of the reduction in energy demand associated with the 3 MW of on-site solar has been added to Section 3.3: Air Quality of the Recirculated EIR. Specifically, the revised text identifies that the Project applicant committed to the following on-site solar Photovoltaic (PV):

- 3 MW <u>(note: this would translate into an approximate reduction of 4,936,921 kWh per year of on-site solar generation).</u>[15]

Response L-15: As stated on page 2.0-9 of the RDEIR Chapter 2.0: Project Description, the Project intends to supply 100 percent of its electricity demand from renewable sources associated with a combination of onsite generation and direct source renewable purchased energy. Moreover, an additional mitigation measure has been added to Section 3.3: Air Quality of the Recirculated EIR. Specifically, the following text has been added to Section 3.3: Air Quality of the Recirculated Draft EIRon page 3.3-32 of Section 3.3: Air Quality (these changes are provided in revision marks with <u>underline for new text</u> and ~~strike-out for deleted text~~.):

[15] Annual energy generation for a 3 MW system was calculated based on PVWatts tool using the system size and Project location. Available here: https://pvwatts.nrel.gov/. Accessed: January 2024.

> ***Mitigation Measure 3.3-2****: The Project applicant shall supply 100% of project electricity from renewable sources. The Project applicant shall procure power from a combination of onsite solar generation and direct source renewable purchased energy; however, at no time shall the Project site be supplied with any greater than 3.4 megawatts of direct source renewable purchased energy.*

Response L-16: The City of Tracy is not required to impose as mitigation all of the measures incorporated in the settlement agreement between Sierra Club and the City of Stockton to reduce energy, air quality and GHG impacts. The fact that one developer agreed to certain measures being incorporated into its project is not evidence that such measures are feasible in a different context and setting for a different project. Moreover, as provided in Comment Response L-15, as stated on page 2.0-9 of the RDEIR Chapter 2.0: Project Description, the Project intends to supply 100 percent of its electricity demand from renewable sources associated with a combination of onsite generation and direct source renewable purchased energy. Furthermore, additional mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR, in response to this comment. First, a mitigation measure has been added to require the site to generate approximately 3 MW of renewable energy from facilities on-site (i.e. Mitigation Measure 3.3-2). Second, an additional mitigation measure has been added to Section 3.3: Air Quality of the Recirculated Draft EIR to install a battery storage system on-site to provide electricity in the event of a 48-hour blackout (Mitigation Measure 3.3-4). Specifically, the changes have been made to pages 3.3-32 through page 3.3-35 of Section 3.3: Air Quality (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.). See Response L-5.

Response L-17: As provided in Comment Response L-15, and as stated on page 2.0-9 of the RDEIR Chapter 2.0: Project Description, the Project intends to supply 100 percent of its electricity demand from renewable sources associated with a combination of onsite generation and direct source renewable purchased energy. Moreover, the Project would not use any natural gas. Furthermore, an additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. See Response L-5. These measures would further reduce energy consumption and add renewable energy features. Specifically, the following changes have been made to page 3.7-35 of Section 3.7: Greenhouse Gases, Climate Change, and Energy (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.):

> Moreover, it should be noted that, over time, electrification of the vehicles will increase due to state requirements, and state and national trends. Electric charging infrastructure would be installed on the property to facilitate the conversion of the truck fleet to zero-emission electric trucks as they become available in the market and used for truck deliveries to and from the facility.
>
> Additionally, Section 3.3: Air Quality includes a total of 36 mitigation measures, many of which would greatly limit the amount of energy used by the Project, as well as utilize renewable energy features. For example, Mitigation Measure 3.3-2 requires that the Project supply 100% of project electricity from renewable sources. Further, Mitigation

Measure 3.3-4 requires the Project applicant to, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.

Furthermore, the proposed Project includes a Transportation Demand Management (TDM) strategy for passenger vehicles, as described under Mitigation Measure 3.13-1 (see Section 3.13: Transportation and Circulation of the Draft EIR, for further detail).

Response L-18: The proposed Project would not use any natural gas (as described within Mitigation Measure 3.3-5). Moreover, as provided in Comment Response L-15, and as stated on page 2.0-9 of the RDEIR Chapter 2.0: Project Description, the Project intends to supply 100 percent of its electricity demand from renewable sources associated with a combination of onsite generation and direct source renewable purchased energy. Moreover, based on this comment, an additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. Specifically, the changes have been made to pages 3.3-32 through 3.3-35 of Section 3.3: Air Quality (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.). See Response L-5.

Response L-19: As noted in Section 3.13 of the Draft EIR, the proposed Project was evaluated using the City of Tracy VMT Calculator. For the surrounding industrial land use area, the City's threshold is 9.4 VMT per employee. The City's VMT Calculator estimates that the Project would generate 24.8 VMT per employee, and the Project exceeds the threshold by 164 percent. It is important to note that truck trips are exempted from VMT analysis per SB 743. As such, a revised VMT analysis with truck trip lengths is not warranted and the original Draft EIR Transportation section still stands.

If the VMT banking fee has not been adopted by the time the EIR is certified, the applicant would not have to pay into the VMT banking fee program. In this case, the applicant would be required to mitigate up to 15% with TDM measures. See Chapter 3.0 of this Response to Comments document which shows the TDM measures that would be implemented as required by Mitigation Measure 3.13-1.

Response L-20: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. Specifically, the changes have been made to pages 3.3-32 through 3.3-35 of Section 3.3: Air Quality (these changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.). See Response L-5. Thus, the lead agency has explored and included within the EIR all feasible mitigation measures to reduce air quality and GHG impacts.

Response L-21: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Final EIR. See response to Comment L-5 for detail of each of these additional mitigation measures. Furthermore, it should be noted that the RDEIR also includes additional TDM measures that would reduce vehicle trips. Such reductions would also reduce air quality and greenhouse gases, given that any reduction in employee trips would also reduce air quality and GHG emissions.

For example, Mitigation Measure 3.3-22 requires the Project applicant to take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site are required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas. Separately, Mitigation Measure 3.3-26 requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit must be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations). The addition of Mitigation Measure 3.3-26 addresses the commentor's concern that is not enough mitigation in the RDEIR relating to increasing the use of electric trucks during Project operation. Finally, with regard to the commentor's concern regarding Mitigation Measure 3.3-1, no justification is needed to support the use of 2010 model year engines within that mitigation measure; rather, the addition of 35 additional air quality-related mitigation measures ensures that all feasible mitigation for air quality emissions are included within the Final EIR. The addition of these and other mitigation measures to the Final EIR ensure that aggressive air quality mitigation measures are implemented as part of the Project.

Separately, it should be noted that the California Air Resources Board maintains regulations that require the upgrading the overall state truck fleet over time, to reduce emissions and transition to zero-emission vehicles. For example, the California Air Resources Board has adopted the Advanced Clean Trucks Regulation and the Advanced Clean Fleets Regulation. The Advanced Clean Trucks Regulation is a manufacturers ZEV sales requirement and a one-time reporting requirement for large entities and fleets. Similarly, the Advanced Clean Fleets Regulation will help advance the introduction of zero-emission technologies into California's truck and bus fleets, requiring fleets that are well suited for electrification to transition to zero-emission vehicles (ZEV) through requirements to phase in the use of ZEVs for targeted fleets and requirements that manufacturers only manufacture ZEV trucks starting in the 2036 model year. These regulations supersede any necessity to include any Project-specific mitigation measure associated with requiring the Project to only utilize zero-emission electric trucks, or heavy-duty trucks equipped with 2014 or later model engine years.

Response L-22: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR, in the Final EIR. See Comment Response L-5. This addresses the commentor's concerns. For example, Mitigation Measure 3.3-2 requires the Project applicant to supply 100% of project electricity from renewable sources (this addresses the commentor's concern relating to incorporating on-site renewable energy into Project design). The Project applicant is also required to procure power from a combination of onsite solar generation and direct source renewable purchased energy. Mitigation Measure 3.3-3 requires the Project applicant to generate approximately 3.8 megawatts

of renewable electricity from solar facilities located on site. Further, Mitigation Measure 3.3-4 requires the Project applicant to, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.

Furthermore, Mitigation Measure 3.3-5 requires the Project applicant to ensure that no natural gas service shall be supplied to the site. Mitigation Measure 3.3-6 requires the Project applicant to ensure that diesel generators shall not be used on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards. Mitigation Measure 3.3-7 requires the Project applicant to ensure that, during Project operation, for trucks owned or operated by Costco that access the site, only ultra-low sulfur diesel fuel or biodiesel blended with sulfur content of 15 ppm or less shall be used, so long as such fuel is commercially available. Mitigation Measure 3.3-27 requires the Project applicant to ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs). Mitigation Measure 3.3-22 requires the Project applicant to take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site would be required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas. These mitigation measures help to address the commentor's concern relating to reducing emissions during Project operation, and to prioritize clean heavy-duty truck parking, infrastructure, and electrification.

Moreover, Mitigation Measure 3.3-26 requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations). This addresses the commentor's concern that the Project should incorporate zero-emission fueling infrastructure.

Further, although the Project does not include a mitigation measure that implements a rate structure to incentivize the utilization of the lowest emitting transport technologies, the inclusion of the additional air quality-related 35 measures reduces air quality emissions to a great degree. This helps to ensure lower emissions.

Lastly, it should be noted that this Project would replace an existing Costco DDC located in Stockton, and therefore at least a portion of its emissions would be offset by the cessation of that existing Costco operation. It should be noted that this would help reduce Project emissions on a net basis, even though this was not accounted for in the RDEIR (for the sake of a conservative analysis).

Response L-23: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR, in the Final EIR. See the Response to Comment L-5 for the entire list of mitigation measures. This addresses the comment's concerns. For example, Mitigation Measure 3.3-2 requires the Project applicant to supply 100% of project electricity from renewable sources (this addresses the commentor's concern relating to incorporating on-site renewable energy into Project design). The Project applicant is also required to procure power from a combination of onsite solar generation and direct source renewable purchased energy. Mitigation Measure 3.3-3 requires the Project applicant to generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site. Further, Mitigation Measure 3.3-4 requires the Project applicant to, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.

Moreover, Mitigation Measure 3.3-26 requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations). This addresses the commentor's concern that the Project should incorporate zero-emission fueling infrastructure.

Furthermore, Mitigation Measure 3.3-25 requires Costco to ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) are electric or zero-emission vehicles, and to provide on-site electrical charging facilities to adequately service such electric vehicles. Additionally, Mitigation Measure 3.3-31 requires Costco to provide electric hookups for construction equipment. Also, Mitigation Measure 3.3-29 requires Costco to install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls. Even further, Mitigation Measure 3.3-17 requires Costco to provide secure, indoor (or covered) bicycle parking for employee bicycles at the front entry of each building, and to provide locker/shower facilities for employees who commute via bicycle.

Therefore, many of the suggested mitigation measures (and more) have been incorporated into the additional 35 air quality-related mitigation measures, included within the Final EIR. Separately, it should be noted that the two projects referenced by the commentor in this comment were approved before the CARB adopted the Advanced Clean Fleets regulation; the proposed rules were approved by the Office of Administrative Law on August 29, 2023, with an effective date of October 1, 2023. (California Code of Regulations, Title 13, §§ 2013–2016[1].) Conversely, the Stockton Mariposa Settlement Agreement was signed by the Sierra Club and the pertinent developer in November 2022, and signed by City in December 2022. CARB's new rules essentially occupy the same field as some of the terms of that earlier settlement agreement.

Response L-24: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR. Specifically, the changes have been made to pages 3.3-32 through 3.3-35 of Section 3.3: Air Quality (these changes are provided in revision marks with

underline for new text and ~~strike out for deleted text~~.). See Response L-5. Many of the suggestions made through the comment and referenced attachments have been incorporated into this EIR as mitigation measures. The City has included the mitigation measures that it deems to be feasible. The concept of feasible mitigation measures may vary depending on location, context, project objectives and specifics, and more. Note that the CARB Advanced Clean Fleet regulations were adopted after the date of the attachments to the comments, and that a number of the suggested requirements pertaining to electric trucks will be accomplished by implementation of these regulations.

Response L-25: Chapter 1.0, Introduction, of the Draft EIR and RDEIR are superseded by a new Introduction chapter, which is included as Appendix D of this document.

Response L-26: An additional 35 mitigation measures have been added to Section 3.3: Air Quality of the Recirculated Draft EIR, as part of the Final EIR. These mitigation measures reflect the Project Design/Sustainability Features set forth in the Project Description, as well as some new requirements. These mitigation measures will also be included within the Mitigation Monitoring and Reporting Program to ensure that they are installed/operated as intended such that they minimize impacts in the way they are being characterized in the Final EIR. This addresses the commentor's concerns regarding enforceability, and the commentor's request to restate Project sustainability features as mitigation (where possible and appropriate).

Response L-27: A General Plan policy consistency analysis has been added to Section 3.10, Land Use, of the Draft EIR. See Chapter 3.0, Revisions, of this Response to Comments document for the additional discussion, which demonstrates that the Project is consistent with General Plan policies.

Response L-28: The commentor states that the RDEIR fails to provide a complete analysis of Project impacts and feasible mitigation measures. The DEIR, RDEIR and this document demonstrate otherwise; Project impacts have been thoroughly and conservatively analyzed and feasible mitigation measures have been identified and incorporated.

Response L-29: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-1.

Response L-30: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-2.

Response L-31: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-3.

Response L-32: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-4.

Response L-33: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-5.

Response L-34: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-6.

Response L-35: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-7.

Response L-36: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-8.

Response L-37: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-9.

Response L-38: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-10.

Response L-39: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-11.

Response L-40: This comment includes the same comments in the commenter's earlier letter from October 2022. See response to comment G-12.

Response L-41: See response to comment G-13.

Response L-42: See response to comment G-14.

Response L-43: See response to comment G-15.

Response L-44: See response to comment G-16.

Response L-45: See response to comment G-17.

Response L-46: See response to comment G-18.

Response L-47: See response to comment G-22.

Response L-48: See response to comment G-21.

Response L-49: This comment does not warrant a response as it includes information regarding a settlement agreement and does not address or pertain to the proposed Project or EIR. It is noted, however, that additional air quality mitigation measures were added to the EIR. See Chapter 3.0, Revisions. These additional mitigation measures address several of the topics in this comment, including but not limited to truck electrification and construction truck trips.

Response L-50: This comment does not warrant a response as it includes information regarding a memorandum of agreement between the City of Stockton and the Attorney General and does not address or pertain to the proposed Project or EIR.

From: Tamara Bartlett <tamjbart@gmail.com>
Sent: Wednesday, January 10, 2024 12:46 PM
To: Genevieve Federighi <Genevieve.Federighi@cityoftracy.org>
Subject: Questions about CostCo Annex

You don't often get email from tamjbart@gmail.com. Learn why this is important

Caution: This is an external email. Please take care when clicking links or opening attachments.

Hi Genevieve,

I'm emailing with questions about the CostCo annex out West of town. Has there been an impact report looking at the traffic and driving conditions? Trying to drive West out of town is incredibly congested and I fear that putting another big warehouse out here will cause more slowness and congestion. Secondly, there seems to be an environmental impact report for air quality, but do we do any sort of impact report for how replacing agricultural area with buildings will effect thermals and warming? Additionally, when the city allows a big industrial complex, do we mandate that the company doing the building provides any greenspace, either at the site or in the community?

These industrial buildings are a really big eye sore and make Tracy seem like a pass-through town, not a destination. I wish we could work to encourage other industry to come here, instead of just another warehouse. The city of Tracy seems like it's satisfied to be a bleak, industrial bedroom community. This CostCo annex seems like it will be just another ugly building that clogs the roads and doesn't benefit the city of Tracy.

M-1

--

Tamara Bartlett

(Pronounced Tam-uh-ruh | She/Her pronouns)

Tracy, CA

tamjbart@gmail.com | (319) 470-2360

Response to Letter M: Tamara Bartlett

Response M-1: This comment primarily asks questions and does not address the adequacy of the EIR. It will be forwarded to the City decisionmakers for consideration together with all the other comments.

Section 3.13, Transportation and Circulation, of the Recirculated Draft EIR includes an analysis of CEQA-related traffic issues for the Project. Impacts related to vehicle-miles-traveled were determined to be significant and unavoidable. All other impacts in this section were determined to be less-than-significant or less-than-significant with mitigation. In accordance with CEQA dictates, transportation impacts have been evaluated applying vehicle miles traveled (VMT) as the threshold of significance rather than levels of service (LOS) at intersections; thus, whether or not intersections operate at acceptable levels does not affect the EIR's impact conclusions. It is noted that LOS standards may be used by the City to impose conditions of approval to maintain the City's LOS standards.

Section 3.2, Agricultural Resources, of the Draft EIR includes an analysis of the agricultural-related impacts resulting from the Project. Impacts associated with conversion of Prime Farmland would be significant and unavoidable. All other impacts in this section were determined to be less-than-significant or less-than-significant with mitigation. It is noted that Tracy Municipal Code Chapter 13.28 establishes the City's Agricultural Mitigation Fee Program, which authorizes the collection of development impact fees to offset costs associated with the loss of productive agricultural lands converted for private urban uses. The Project would be subject to the City's Agricultural Mitigation Fee Program. In addition to the City's agricultural mitigation fee program, the SJMSCP requires development to pay fees on a per-acre basis for impacts to agricultural lands that function as habitat for biological resources. SJCOG will then use these funds to purchase the conservation easements on agricultural and habitat lands in the Project vicinity. The compensation results in the purchase of conservation easements that are placed over agricultural land. As such, the Project fees paid to SJCOG as administrator of the SJMSCP will result in the preservation of agricultural lands in perpetuity.

With respect to greenspace, the City does require park development impact fees from new development. Chapter 13.12 of the City's Municipal Code outlines the requirements and provisions for the City's park development impact fee.

This page left intentionally blank.

This section includes minor edits and changes to the Draft Environmental Impact Report (Draft EIR) and Recirculated Draft EIR (RDEIR). These modifications resulted from responses to comments received during the public review period for the Draft EIR and RDEIR, as well as City staff-initiated edits to clarify the details of the project.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis and do not otherwise warrant recirculation of the Draft EIR or RDEIR pursuant to State CEQA Guidelines Section 15088.5.

Other minor changes to various sections of the Draft EIR are also shown below. These changes are provided in revision marks with <u>underline for new text</u> and ~~strike out for deleted text~~.

3.1 REVISIONS TO THE DRAFT EIR

1.0 INTRODUCTION

Chapter 1.0, Introduction, of the Draft EIR and RDEIR are superseded by a new Introduction chapter, which is included as Appendix D of this document.

2.0 PROJECT DESCRIPTION

No changes were made to Chapter 2.0 of the RDEIR.

3.1 AESTHETICS AND VISUAL RESOURCES

No changes were made to Section 3.1 of the Draft EIR.

3.2 AGRICULTURAL RESOURCES

No changes were made to Section 3.2 of the Draft EIR.

3.3 AIR QUALITY

The following change was made to page 3.3-27 of Section 3.3 of the RDEIR:

> The following additional non-default CalEEMod model assumptions were utilized, based on information provided by the Project applicant:
>
> - Soil import of 70,000 cubic yards during the Project's Grading phase;
> - Off-road construction equipment to utilize "Tier IV" diesel engines, for equipment with a horsepower greater than 50 horsepower;
> - <u>Project Specific Equipment mix was provided:</u>
>   - <u>Site Preparation:</u>
>   - <u>2 Rubber Tired Dozer</u>
>   - <u>2 Tractors/Loaders/Backhoes</u>
>   - <u>2 Off-Highway Trucks (Water Truck)</u>
>   - <u>Grading:</u>

        - 1 Grader
        - 2 Excavators
        - 1 Tractors/Loaders/Backhoes
        - 6 Scrapers
        - 1 Rubber Tired Dozer
        - 3 Off-Highway Trucks (Water Trucks)
        - 2 Other Construction Equipment (Soil Pulverizer)
    - Off-Site Grading
        - 1 Grader
        - 3 Excavators
        - 2 Tractors/Loaders/Backhoes
        - 1 Scraper
        - 1 Rubber Tired Dozer
        - 1 Forklift
        - 2 Off-Highway Trucks (Water Truck)
        - 1 Skid Steer Loader
    - Off-Site Improvements
        - 1 Forklift
        - 6 Tractors/Loaders/Backhoes
    - Off-Site Paving
        - 2 Paver
        - 2 Paving Equipment
        - 2 Rollers
    - Phase 1 Building Construction
        - 8 Aerial Lifts
        - 6 Forklifts
        - 4 Generator Sets
        - 1 Crane
        - 1 Welder
        - 3 Tractors/Loaders/Backhoes
    - Site Finishing (Phase 1)
        - 1 Skid Steer Loader
        - 1 Tractors/Loaders/Backhoes
        - 1 Trencher
    - Paving (Phase 1):
        - 2 Pavers
        - 2 Paving Equipment
        - 2 Rollers
    - Phase 2 Building Construction
        - 8 Aerial Lifts
        - 4 Forklifts
        - 2 Generator Sets
        - 1 Crane
        - 1 Welder
        - 3 Tractors/Loaders/Backhoes
    - Site Finishing (Phase 2)
        - 1 Skid Steer Loader

        - 1 Tractor/Loader/Backhoe
        - 1 Trencher
    - Paving (Phase 2)
        - 2 Pavers
        - 2 Paving Equipment
        - 2 Rollers
- Daily on-road construction haul trucks trips as follows:
    - Grading phase: 61 haul trips
    - Phase 1 Site Finishing: 48 haul trips
    - Phase 2 Site Finishing: 73 haul trips
    - Off-site Paving: 12 haul trips
    - Off-site Improvements: 11 haul trips
    - Phase 1 Paving: 41 haul trips
    - Phase 2 Paving: 146 haul trips
- Heavy-duty operational truck trips were assumed to travel 29 miles per one-way trip, on average, consistent with San Joaquin County's travel demand model;
- The overall average trip distance was estimated to be approximately 21.37 miles, based on a 29 mile trip length that was assumed for heavy-duty vehicles; and an approximately 17.75 trip length (conservative assumption based on largest default CalEEMod assumed trip length value) that was assumed for all other vehicles, for a weighted average trip length of approximately 21.37 miles.
- Fleet mix as provided by the Traffic Study. Specifically, the heavy-duty (i.e. HDD) fleet mix was adjusted from the CalEEMod default (of approximately 1.745%) to reflect an HHD fleet mix of 32.211% of all vehicle trips (consistent with the proportion of HDD trips as a proportion of overall trips, as provided by Kimley Horn). The fleet mix percentages for each of the other (i.e. non-HHD) vehicles was adjusted downward from the CalEEMod defaults, proportionally (to account for the increased proportion of HHD vehicles as a proportion of the overall fleet mix).
- The 'General Category' consumer products emissions factor was revised to reflect the CARB adjustments applied to their Consumer and Commercial Product Survey Emission data, made after the 2008 consumer products emissions factor (the adjustment made to reflect the average adjustment factor).[1]

The following quantified Project sustainability features relevant to air quality emissions were quantitatively accounted for:

- Construction: Water Exposed Surfaces Twice Daily;
- Energy: Require Energy Efficient Appliances (commercial refrigerator).

The Project applicant committed to the following on-site solar Photovoltaic (PV):

- 3 MW (note: this would translate into an approximate reduction of 4,936,921 kWh per year of on-site solar generation).[2]

[1] See for further detail: https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-emissions-inventory-and-temporal 0.0000107

[2] Annual energy generation for a 3 MW system was calculated based on PVWatts tool using the system size and Project location. Available here: https://pvwatts.nrel.gov/. Accessed: January 2024.

The following change was made to page 3.3-31 through 3.3-35 of Section 3.3 of the RDEIR:

The Project incorporates various policy and rule-required implementation measures that would reduce related emissions, including all of the current Air District rules and regulations.[3] For example, the proposed Project would be required to implement Air District Rule 9510, which ensures that the Project would fulfill the Air District's emissions reduction commitments in the relevant PM_{10} and Ozone Attainment plans.[4] In addition, the Project would comply with all applicable stationary source permitting rules implemented by SJVAPCD, which further confirms the Project would not cause or contribute to any ambient air quality standard exceedances. Moreover, crucially, the proposed Project would also implement various mitigation measures that would reduce Project operational and construction emissions, as provided below. The proposed Project would be required to implement Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36.

Nevertheless, for the sake of a conservative assessment, the proposed Project's potential impact to this environmental topic is considered ***significant and unavoidable.*** Therefore, the proposed Project would be required to implement Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36, as provided below.

MITIGATION MEASURE(S)

Mitigation Measure 3.3-1: *During Project operation, operators of heavy-duty trucks that travel to and from the Project site are required to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment.*

Mitigation Measure 3.3-2*: The Project applicant shall supply 100% of project electricity from renewable sources. The Project applicant shall procure power from a combination of onsite solar generation and direct source renewable purchased energy; however, at no time shall the Project site be supplied with any greater than 3.4 megawatts of direct source renewable purchased energy.*

Mitigation Measure 3.3-3*: Upon Project opening, the Project applicant shall generate approximately 3.8 megawatts of renewable electricity from solar facilities located on site. Such facilities may include solar photovoltaic panels on the roofs of the buildings or elsewhere on site (e.g., awnings, canopies or "solar trees" in parking area).*

Mitigation Measure 3.3-4*: The Project shall be designed and constructed to allow future expansion of solar facilities on site as electricity demand increases. The Project applicant shall, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.*

Mitigation Measure 3.3-5*: The Project applicant shall ensure that no natural gas service shall be supplied to the site.*

Mitigation Measure 3.3-6*: The Project applicant shall ensure that diesel generators shall not be used on site during project operations, except in emergency situations, in which case such generators shall have Best Available Control Technology (BACT) that meets CARB's final Tier IV emission standards.*

[3] See here for further detail: https://www.valleyair.org/rules/1ruleslist.htm
[4] Compliance with Air District Rule 9510 is assumed under CEQA.

Mitigation Measure 3.3-7*: The Project applicant shall ensure that, during Project operation, for trucks owned or operated by Costco that access the site, only ultra-low sulfur diesel fuel or biodiesel blended with sulfur content of 15 ppm or less shall be used, so long as such fuel is commercially available.*

Mitigation Measure 3.3-8*: The Project applicant shall install and maintain perimeter landscaping that includes vegetation and a tree canopy (which may include structural solar canopies).*

Mitigation Measure 3.3-9*: The Project applicant shall ensure the Project building(s) exceeds applicable Title 24 Building Envelope Energy Efficiency Standards by at least 1%.*

Mitigation Measure 3.3-10*: The Project applicant shall install Energy Star certified appliances or equivalent.*

Mitigation Measure 3.3-11*: The Project applicant shall install energy efficient lighting that meets or exceeds Title 24 requirements.*

Mitigation Measure 3.3-12*: The Project applicant shall install roofs with a reflectivity factor of at least 78 to the extent that such roofs do not interfere with photovoltaics installed on roofs.*

Mitigation Measure 3.3-13*: The Project applicant shall ensure that construction plans require that architectural and industrial maintenance coatings (e.g., paints) applied on the Project site shall be consistent with a VOC content of <50 g/L. However, the Project applicant shall not be expected to exercise control over materials painted offsite by a third party.*

Mitigation Measure 3.3-14*: The Project applicant shall devise and implement a property maintenance plan during Project operation that includes sweeping parking lots regularly to remove road dust, tire wear, brake dust, and other contaminants.*

Mitigation Measure 3.3-15*: The Project applicant shall Install High Efficiency MERV filters within the HVAC systems.*

Mitigation Measure 3.3-16*: The Project applicant shall install a separate employee parking area accessible by its own curb cut entry and a flashing lit sidewalk that connects the employee parking with the buildings.*

Mitigation Measure 3.3-17*: The Project applicant shall provide bicycle parking for employee bicycles at the front entry of each building. Bicycle parking shall be secure and shall be located indoors or be covered. Provide locker/shower facilities for employees who commute via bicycle.*

Mitigation Measure 3.3-18*: The Project applicant shall provide electrical outlets for charging of employee e-bikes.*

Mitigation Measure 3.3-19*: The Project applicant shall provide no more than the minimum number of parking spaces required by City code.*

Mitigation Measure 3.3-20*: The Project applicant shall participate in an existing, agency-run employee rideshare program, such as dibs by the San Joaquin Council of Government or another similar program, and promote ridesharing among its employees.*

Mitigation Measure 3.3-21*: The Project applicant shall provide food and drink service for sale onsite to provide meal options to operations employees in a consistent manner.*

Mitigation Measure 3.3-22*: The Project applicant shall take reasonable measures to restrict truck idling (during construction and operation) onsite to a maximum of two minutes, and in no instance shall idling exceed five minutes. To achieve this limit, (a) trucks owned or operated by Costco that access the project site shall be required to be equipped with engine idle shutdown timers and (b) the developer shall inform drivers and operators of idling time limits by including highly visible signage at key points onsite, such as at docks and delivery areas.*

Mitigation Measure 3.3-23*: The Project applicant shall train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.*

Mitigation Measure 3.3-24*: The Project applicant shall Designate efficient truck routes for trucks owned and operated by Costco.*

Mitigation Measure 3.3-25*: The Project applicant shall ensure that all exclusively on-site vehicles owned and operated by Costco (i.e., forklifts, yard goats, pallet jacks, scissor lifts, etc.) shall be electric or zero-emission vehicles. The Project applicant shall provide on-site electrical charging facilities to adequately service such electric vehicles.*

Mitigation Measure 3.3-26*: The Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).*

Mitigation Measure 3.3-27*: The Project applicant shall ensure that trucks owned or operated by Costco that access the Project site shall not include active Transport Refrigeration Units (TRUs).*

Mitigation Measure 3.3-28*: The Project applicant shall provide priority parking for employee carpool vehicles.*

Mitigation Measure 3.3-29*: The Project applicant shall install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls.*

Mitigation Measure 3.3-30*: The Project applicant shall ensure that, during Project construction activities, off-road construction equipment greater than 50 horsepower shall have final Tier IV-compliant or better engines.*

Mitigation Measure 3.3-31*: The Project applicant shall provide electric hookups for construction equipment. If diesel generators are needed during construction, such generators shall be equipped with emission control technology verified by the Environmental Protection Agency (EPA) and/or the California Air Resources Board (CARB) to reduce particulate matter emissions by a minimum of 85%.*

Mitigation Measure 3.3-32*: The Project applicant shall ensure that heavy-duty diesel hauling trucks that access the Project site for construction shall be model year 2010 or newer, so long as such trucks are reasonably available.*

Mitigation Measure 3.3-33*: The Project applicant shall prepare and implement a construction traffic control plan during the Project's construction phase.*

Mitigation Measure 3.3-34*: The Project applicant shall, during construction, install signage on any unpaved primary construction accessways onsite on the project site to limit vehicle speeds to no more than 15 mph.*

Mitigation Measure 3.3-35*: Project construction plans and specifications shall require the contractor to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide food service in a consistent manner.*

Mitigation Measure 3.3-36*: The Project applicant shall employ the following strategies during construction to minimize noise:*

(a) Concrete delivery vehicles shall have low frequency back up beepers that meet Cal-OSHA requirements.

(b) All fleet equipment shall have mufflers and noise-minimizing devices.

(c) Personal radios shall not be allowed onsite.

The following change was made to page 3.3-39 through 3.3-41 of Section 3.3 of the RDEIR:

Proposed Project operational emissions 'inclusive of quantified Project Sustainability features' are shown in Table 3.3-13 and Table 3.3-14, based on implementation of SJVAPCD Rule 9510. While compliance with SJVAPCD Rule 9510 is regulatorily required, the rule itself is an indirect source rule designed to achieve emission reductions from development projects. Thus, it is included here to represent the SJVAPCD regulatory requirement to mitigate the operational emissions.[5] The proposed Project would also be required to implement Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36, as provided under Impact 3.3-1. However, due to the difficulty in modeling the emissions (i.e., NOx emissions) reductions that would occur due to implementation of Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36, the emissions reductions associated with Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36 were not modeled. Thus, Table 3.3-13 and Table 3.3-14 provide a conservative estimate of the operational emissions results for the proposed Project, with the quantified Project sustainability features accounted for.

TABLE 3.3-13: OPERATIONAL PROJECT GENERATED EMISSIONS (TONS PER YEAR) – INCLUSIVE OF QUANTIFIED PROJECT SUSTAINABILITY FEATURES

POLLUTANT	*CO*	*NOX*	*ROG*	*SOX*	*PM_{10}*	*$PM_{2.5}$*
THRESHOLD	100	10	10	27	15	15
EMISSIONS	39.9	15.6	7.69	0.23	11.8	3.33
EXCEEDS THRESHOLD?	**N**	**Y**	**N**	**N**	**N**	**N**

SOURCES: CALEEMOD (V.2022.1)

[5] The NOx emissions were adjusted to reflect the 33.3% reduction required, per compliance with Air District Rule 9510.

TABLE 3.3-14: OPERATIONAL PROJECT GENERATED EMISSIONS (POUNDS PER DAY) – INCLUSIVE OF QUANTIFIED PROJECT SUSTAINABILITY FEATURES

POLLUTANT	*CO*	*NOX*	*ROG*	*SOX*	*PM_{10}*	*$PM_{2.5}$*
THRESHOLD	100	100	100	100	100	100
EMISSIONS	88.9	6.8	34.7	0.1	3.8	1.2
EXCEEDS THRESHOLD?	**N**	**N**	**N**	**N**	**N**	**N**

SOURCES: CALEEMOD (V.2022.1)

NOTE: THE SUM OF INDIVIDUAL BUILDINGS' EMISSIONS MAY NOT EXACTLY EQUAL THE TOTAL PROJECT EMISSIONS DUE TO ROUNDING, AS WELL AS DUE TO A CONSERVATIVE OVERCOUNTING OF THE TOTAL PROJECT ASPHALT AREAS FOR EACH INDIVIDUAL PROJECT BUILDING WITHIN THE 'INDIVIDUAL BUILDING' SCENARIOS.

NOTE: EMISSIONS ONLY INCLUDE THOSE EMISSIONS THAT ARE CONSIDERED "ON-SITE", PER SJVAPCD GUIDANCE. THIS EXCLUDES "MOBILE" EMISSIONS, EXCEPT FOR APPROXIMATELY 5.2% OF MOBILE EMISSIONS THAT ARE ESTIMATED TO BE ON-SITE, USING A CONSERVATIVE ESTIMATE OF THE ON-SITE MOBILE TRAVEL (1.110701 MILES) DIVIDED BY THE AVERAGE VEHICLE LENGTH FOR THE PROJECT OF 21.37224776 MILES.

The emission estimates provided in Table 3.3-13 and Table 3.3-14 demonstrate a reasonable worst-case scenario for Project operation. Because the operational emissions shown therein would exceed the SJVAPCD's significance thresholds for NOx, even with implementation of Project sustainability features and mitigation measures, this impact would remain ***significant and unavoidable***.

REGULATORY COMPLIANCE

In accordance with SJVAPCD Rule 9510, an Air Impact Assessment (AIA) shall be prepared based on the applicability and exemption criteria of Rule 9510.[6] The rule includes general mitigation requirements for construction and/or operational emissions. Per the general mitigation requirements of Rule 9510, the Project shall reduce the project's operational baseline NOx emissions by 33.3% over a period of ten years as quantified in the approved AIA. The project shall pay any off-site fees in full by the invoice due date or prior to generating the emissions associated with the Project or any phase thereof, whichever occurs first.

Separately, prior to the issuance of a Grading Permit for each phase of the Project, the Project Proponent shall prepare and submit a Dust Control Plan that meets all of the applicable requirements of APCD Rule 8021, Section 6.3. Additionally, the Project would be required to implement dust control measures that include application of water or chemical dust suppressants to unpaved roads and graded areas, covering or stabilization of transported bulk materials, prevention of carryout or trackout of soil materials to public roads, limiting the area subject to soil disturbance, construction of wind barriers, access restrictions to inactive sites, as required by the applicable rules. The Project would also be required to, during all construction activities, implement the dust control practices identified in Tables 6-2 and 6-3 of the GAMAQI (2002).

CONCLUSION

Criteria pollutant emissions generated by the proposed Project during operation would exceed applicable thresholds after compliance with all rules and regulations, even after implementation of Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36. No other feasible mitigation measure exists to reduce the applicable operational criteria pollutant impacts to below the applicable

[6] Available at: https://www.valleyair.org/rules/currntrules/r9510-a.pdf. Accessed: September 2023.

SJVAPCD thresholds. Therefore, this impact would be ***significant and unavoidable***.

MITIGATION MEASURE(S)

Implement Mitigation Measure 3.3-1 through Mitigation Measure 3.3-36.

3.4 BIOLOGICAL RESOURCES

No changes were made to Section 3.4 of the Draft EIR.

3.5 CULTURAL AND TRIBAL RESOURCES

No changes were made to Section 3.5 of the Draft EIR.

3.6 GEOLOGY AND SOILS

No changes were made to Section 3.6 of the Draft EIR.

3.7 GREENHOUSE GASES, CLIMATE CHANGE, AND ENERGY

The following changes were made to page 3.7-29 through 3.7-31 of Section 3.7 of the RDEIR:

TABLE 3.7-5: PROJECT CONSISTENCY WITH THE SJCOG'S 2022 RTP/SCS

POLICY/STRATEGY	*PROJECT CONSISTENCY*
Policy 1: Enhance the Environment for Existing and Future Generations and Conserve Energy	No Conflict. The Project would supply 100% of project electricity demand from renewable resources, as provided under Mitigation Measure 3.3-2. As also described under Mitigation Measure 3.3-2, the Project applicant shall procure power from a combination of onsite solar generation and direct source renewable purchased energy. Furthermore, consistent with Mitigation Measure 3.3-4, the Project applicant would, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48~~utilize electricity provided by Pacific Gas & Electric (PG&E) which is required to meet the future year renewable portfolio performance standards~~. In addition, future development associated with Project implementation would be required to meet the applicable requirements of the 2022 (or more current) Title 24 Building Energy Efficiency Standards.
Strategy No. 1: Encourage efficient development patterns that maintain agricultural viability and natural resources.	No Conflict. While the Project is located on land that was formerly used for agricultural activities, the Project represents an efficient use of land, and is located an in area that has been planned for industrial and commercial development. Therefore, the Project provides for an efficient development pattern that does not notably disrupt agricultural viability and natural resources. To offset any potential long-term impacts to the agricultural vitality of the region, the Tracy Municipal Code (Chapter 13.28) establishes the City's Agricultural Mitigation Fee Program, which authorizes the collection of development fees to offset costs associated with the loss of productive agricultural lands converted to urban uses (including residential, commercial, industrial, or other urban uses) within the City by permanently protecting agricultural lands planned for agricultural use and by working with farmers who voluntarily wish to sell or restrict their land in exchange for fair compensation. Agricultural mitigation fees are collected by the City at the time that building permits are issued and may be used to conserve

POLICY/STRATEGY	*PROJECT CONSISTENCY*
	existing agricultural land by securing farmland conservation easements, farmland deed restrictions, or other agreements.
Strategy No. 2: Encourage preservation of natural resources.	No Conflict. The Project would not eliminate or notably reduce access to natural resources.
Strategy No. 3: Enhance the connection between land use and transportation choices through projects supporting energy and water efficiency.	No Conflict. The Project includes a wide array of sustainability features and mitigation measures (see Mitigation Measure 3.3-1 through 3.3-36 in Section 3.3: Air Quality) that would greatly support energy and water efficiency. For example, as described on page 3.3-29 of the RDEIR, the Project would install high-efficiency restroom fixtures, which conserve water by achieving a 40% decrease over U.S standards. Furthermore, gas water heaters would be direct vent and 94% efficient or greater.
Strategy No. 4: Improve air quality by reducing transportation-related emissions.	No Conflict. The Project includes a wide array of sustainability features and mitigation measures (see Mitigation Measure 3.3-1 through 3.3-36 in Section 3.3: Air Quality) that would greatly limit air quality impacts by reducing transportation-related emissions. Moreover, the Project would replace an existing warehouse, thereby partially offsetting some existing transportation-related air quality emissions. Moreover, as described under Mitigation Measure 3.3-22, the Project would take reasonable measures to restrict truck idling, thereby limiting transportation-related emissions associated with idling. Mitigation Measure 3.3-23 would also reduce idling by increasing training associated with efficient schedule and load management to minimize queuing and idling of trucks. In addition, Mitigation Measure 3.3-27 requires that trucks owned or operated by Costco that access the Project site would not include TRUs. Lastly, electric vehicle chargers would be provided within the Project site.
Policy 2: Maximize Mobility and Accessibility	No Conflict. The Project would support the use of zero-emission and low-emission vehicles, by design to facilitate conversion of truck docks to serve electric trucks. Electric charging infrastructure will be installed on the property to facilitate the conversion of the truck fleet to zero-emission electric trucks once commercially available.. In addition, the Project would support EV-ready charging spaces, consistent with the requirements of the latest version of the Title 24 Building Energy Efficiency Standards. In addition, although this Project is not a transportation improvement project, the Project is located in a city where regional transit improvements are planned. Moreover, the proposed Project would include many project features that improve mobility and accessibility, including providing pedestrian network improvements, providing bicycle parking, and providing rideshare employees to employees.
Strategy No. 5: Optimize the public transportation system to provide efficient and convenient access for users of all income levels.	No Conflict. The proposed Project would not meaningfully disrupt or hinder the public transportation system.
Strategy No. 6: Encourage infill developments and development near transit, including transit-oriented development to maximize existing transit investments.	No Conflict. The proposed Project would be a warehouse project located in an area that is not currently in use. Such projects do not lend themselves well to transit. Nevertheless, the proposed Project would not conflict with this strategy.
Strategy No. 7: Provide transportation improvements to facilitate nonmotorized travel, including incorporation of	No Conflict. The proposed Project is a warehouse project that would include development of additional features that would facilitate nonmotorized travel. For example, the Project includes bicycle parking and electric outlets for the charging of employee e-bikes and will

POLICY/STRATEGY	*PROJECT CONSISTENCY*
complete streets elements as appropriate.	provide lockers/showers for employees that commute via bicycle.
Strategy No. 8: Improve freight access to key economic centers.	Not applicable. The Project is not a transportation project and therefore this strategy would not apply to the Project.
Strategy No. 9: Promote safe and efficient strategies to improve the movement of goods by water, rail, and truck.	No Conflict. Although the Project is not a transportation project, is would not conflict with this strategy, since it would develop a warehouse that would facilitate the movement of goods.
Policy 3: Increase Safety and Security	No Conflict. The Project would be developed using the latest State and local requirements relating to safety and security. Development of the Project site would include other uses to support and complement the proposed residential development include public utility infrastructure, public and private roadways, curb/gutters/sidewalks, other pedestrian facilities, private parking, street lighting, and street signage, which would enhance the safety and security of the site and it surroundings, by connecting to existing development.
Strategy No. 10: Facilitate projects that reduce the number and severity of traffic incidents.	No Conflict. The Project would be developed according to applicable City and State traffic standards. Moreover, the Project is located in an area of the City that is designed for industrial and commercial projects. Therefore, the Project is anticipated to be consistent with this strategy.
Strategy No. 11: Support local and state efforts for transportation network resiliency, reliability and climate adaptation.	No Conflict. The Project includes various sustainability features and mitigation measures, such as Mitigation Measure 3.3-1 through 3.3-36, which would help to minimize the Project's impact on the transportation network and reliability.
Policy 4: Preserve the Efficiency of the Existing Transportation System	Not applicable. This is not a transportation improvement project and is therefore not applicable. The Project would not interfere with the efficiency of any existing transportation system.
Strategy No. 12: Prioritize projects that make more efficient use of the existing road network.	No Conflict. The Project would make highly efficient use of the nearby road network, as the Project is located near to the existing freeways, which would minimize the amount of local roads utilized to transport good to and from the Project site.
Strategy No. 13: Support the continued maintenance and preservation of the existing transportation system.	No Conflict. The Project is required to pay applicable transportation fees and therefore would help to maintain and preserve the existing transportation system.
Strategy No. 14: Promote electric power, alternative fuels and autonomous technologies for freight and agriculture.	No Conflict. Mitigation Measure 3.3-26 requires the Project applicant to install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).
Strategy No. 15: Manage the adoption of electric vehicles and private connected and autonomous vehicles.	No Conflict. The proposed Project is not a transportation project. Nevertheless, the proposed Project would include electric vehicle charging. For example, Mitigation Measure 3.3-29 requires the Project applicant is required to install six (6) electric vehicle chargers in a preferential parking location adjacent to the ADA and carpool parking stalls; in addition, Mitigation Measure 3.3-26 requires the Project applicant shall install conduit as infrastructure for electric vehicle charging stations onsite to allow for truck docks to serve electric trucks in the future. Such conduit shall be provided on the site to serve 50% of the number of truck docking stations, with the location of conduit at the discretion of the developer (e.g., truck trailer parking spaces or other locations).
Strategy No. 16: Promote electric power, alternative fuels	Not Applicable. The proposed Project is not a transportation project.

POLICY/STRATEGY	*PROJECT CONSISTENCY*
and autonomous technologies for public transit.	
Policy 5: Support Economic Vitality	No Conflict. The proposed Project would create local jobs as well as provide new shopping options for local and regional residents, thereby supporting economic vitality (by allowing for Costco to expand its available customer inventory and to efficiently supply goods to Costco members).
Strategy No. 17: Support transportation improvements that improve economic competitiveness, revitalize commercial corridors and strategic economic centers, and enhance travel and tourism opportunities.	No Conflict. The Project would provide economic development to the City of Tracy, help promote economic competitiveness in the region, and would pay its fair share of traffic improvements.
Strategy No. 18: Support workforce training across industries, particularly transportation-related industries.	No Conflict. The Project would include workforce training, including Mitigation Measure 3.3-23, which requires the Project applicant to train managers and employees on efficient scheduling and load management to minimize queuing and idling of trucks.
Strategy No. 19: Encourage and/or strengthen small business, while supporting large employer recruitment.	No Conflict. The Project would not meaningfully conflict with this strategy.
Strategy No. 20: Invest in high-speed internet infrastructure to support e-business and reduce commuting.	No Conflict. The Project is not an infrastructure project. Nevertheless, the Project would not conflict with this strategy.
Policy 6: Promote Interagency Coordination and Public Participation for Transportation Decision-Making and Planning Efforts	Not applicable. This is not a transportation planning or improvement project and is therefore not applicable.
Strategy No. 21: Provide equitable access to transportation planning.	Not applicable. The Project is not a transportation project. Nevertheless, the Project would not conflict with this strategy.
Strategy NO. 22: Engage the public early, clearly, and continuously.	No Conflict. The Project is subject to CEQA, including the preparation of an Environmental Impact Report. Early, clear, and continuous public engagement has been part of the entire CEQA process. Therefore, the Project does not conflict with this strategy.
Strategy No. 23: Use a variety of methods to engage the public, encouraging representation from diverse income and ethnic background.	No Conflict. The Project is subject to CEQA, including the preparation of an Environmental Impact Report. A variety of methods to engage the public have been utilized throughout the entire CEQA process, including public scoping meetings and presentation and correspondence with the City of Tracy's Environmental Sustainability Commission. Therefore, the Project does not conflict with this strategy.
Policy 7: Maximize ~~the~~ Cost Effectiveness	No Conflict. The proposed Project would be developed based on market demand.
Strategy No. 24: Support efforts to streamline the development process.	No Conflict. The proposed Project is a warehouse development. The proposed Project would not conflict with this strategy.
Strategy No. 25: Support the use of state and federal grants to supplemental local funding and pursue discretionary grant funding opportunities from	No Conflict. The proposed Project is a warehouse development. The proposed Project would not conflict with this strategy.

POLICY/STRATEGY	*PROJECT CONSISTENCY*
outside the region.	
Strategy No. 26: Support projects that maximize cost effectiveness.	No Conflict. The proposed Project is a warehouse development that would support economic competitiveness in the region. The proposed Project would not conflict with this strategy.
Strategy. No 27: Maximize funding of existing transportation options.	No Conflict. The proposed Project is a warehouse development that would pay its fair share of transportation fees. The proposed Project would not conflict with this strategy.
Policy: Improve the Quality of Life for Residents	No Conflict. The proposed Project would provide warehousing that would allow for additional shopping options for local and regional residents (by allowing for Costco to expand their available customer inventory), thereby improving the quality of life for residents.
Strategy No. 28: Promote a broader range of housing types.	Not applicable. The Project is not a residential project and therefore this strategy is not applicable.
Strategy No. 29: Support the development of a regional trust fund dedicated to addressing housing issues.	Not applicable. The Project is not a residential project and therefore this strategy is not applicable.
Strategy No. 30: Enhance public health through active transportation projects.	Not applicable. The Project is not a transportation project and therefore this strategy is not applicable.

SOURCE: SJCOG 2022 RTP/SCS

The following change was made to page 3.7-35 of Section 3.3 of the RDEIR:

> The Project is also anticipated to produce approximately 3 MW of solar photovoltaic (PV) for on-site use. Furthermore, to the extent they do not conflict with the proposed rooftop solar PV panels, all building roofs would maintain a reflectance rating of .68, emittance of .25 and Solar Reflectance Index of 63, lessening heat gain. Further, HVAC comfort systems would be controlled by a computerized building management system to maximize efficiency.
>
> Moreover, it should be noted that, over time, electrification of the vehicles will increase due to state requirements, and state and national trends. Electric charging infrastructure would be installed on the property to facilitate the conversion of the truck fleet to zero-emission electric trucks as they become available in the market and used for truck deliveries to and from the facility.
>
> Additionally, Section 3.3: Air Quality includes a total of 36 mitigation measures, many of which would greatly limit the amount of energy used by the Project, as well as utilize renewable energy features. For example, Mitigation Measure 3.3-2 requires that the Project supply 100% of project electricity demand from renewable sources. Further, Mitigation Measure 3.3-4 requires the Project applicant to, as part of the solar microgrid, install a battery storage system with enough capacity to power the project's basic building functions for 48 hours.

3.8 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to Section 3.8 of the Draft EIR.

3.9 HYDROLOGY AND WATER QUALITY

No changes were made to Section 3.9 of the Draft EIR.

3.10 LAND USE

The following changes were made to page 3.10-11 of Section 3.10 of the Draft EIR:

> Additionally, the Project is consistent with the applicable General Plan policies that aim to avoid or mitigate an environmental effect. As shown in Table 3.10-1, the Project is consistent with the City's General Plan policies.

TABLE 3.10-1: GENERAL PLAN POLICY CONSISTENCY

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
LAND USE	
LU-6.1-P9. New industrial or mining uses shall be designed to not adversely impact adjacent uses, particularly residential neighborhoods, with respect to, but not limited to, noise, dust and vibration, water quality, air quality, agricultural resources and biological resources.	**Consistent.** The proposed Project is not located adjacent to a residential neighborhood. Compliance with the mitigation measures in the Draft EIR would ensure that any potential impacts related to the topics listed in this Policy are reduced to a less-than-significant level or to the extent feasible. It is also noted that the City is currently processing an application to annex the adjacent property at 16286 W. Schulte Road into the City and develop a proposed one-story, approximately 217,466 square foot industrial warehouse and associated truck trailer and employee parking lots thereon. As part of this application, if approved, the single-family residence would be demolished prior to redevelopment of the site. The Notice of Preparation for this project, the Schulte Road Warehouse, was released in December 2023.
COMMUNITY CHARACTER	
CC-1.1-P3. All new development and redevelopment shall adhere to the basic principles of high-quality urban design, architecture and landscape architecture including, but not limited to, human-scaled design, pedestrian-orientation, interconnectivity of street layout, siting buildings to hold corners, entryways, focal points and landmarks.	**Consistent.** The proposed Project incorporates quality design and landscape architecture. As noted in Chapter 2.0, Project Description, landscaping would be provided throughout the Project site. The Project would provide a clearly-delineated, separate pedestrian pathway for employees connecting project buildings to the employee parking area and such pathway would include a lit crosswalk with flashing indicator lights where the path crosses vehicle routes. Additionally, an ADA-compliant pedestrian pathway would extend from each building to the northern property boundary, where it would connect to West Schulte Road. Further, the proposed warehouse design would be contemporary in style and would use a variety of massing and materials appropriate for the scale of the buildings. Architectural metal with varied textures and horizontal and vertical orientations would be used, while varying parapet cap heights would break up the long elevations both horizontally and vertically. The parapets will also assist in concealing rooftop-mounted mechanical equipment. The proposed architecture places and focuses the design's detailed elements, varied building materials and color changes towards the front of the buildings along West Schulte Road.
CC-1.1-P4. To the extent possible, site layout and building design should take into account Tracy's warm, dry climate, such as through the inclusion of trees and landscaping or other architectural elements to provide shade.	**Consistent.** The proposed Project incorporates quality design and landscape architecture. As noted in Chapter 2.0, Project Description, landscaping would be provided throughout the Project site. The landscape plan includes a mix of drought-tolerant shrubs and grasses, and a variety of shade trees appropriate for the climate in Tracy would be used throughout the parking lots and along the Project perimeter.
CC-1.1-P5. Lighting on private and public property should be designed to provide safe and adequate	**Consistent.** As noted in Chapter 2.0, Project Description, the employee parking lot and truck and trailer parking areas would be illuminated with standard downward pointing lights, each containing

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
lighting, while minimizing light spillage to adjacent properties.	two LED fixtures affixed to a 38-foot foot light pole. The lighting fixtures would be of a "shoe-box" style. Parking lot light standards would be designed to provide even light distribution for vehicle and pedestrian safety as well as site and building security without causing light to spill onto adjacent properties. Lighting fixtures also would be located approximately every 40 feet around the exterior of the warehouse buildings to provide additional lighting for safety and security.
CC-1.2-P1. New development projects shall be approved only if they meet the design principles set forth in the Community Character Element and in detailed design guidelines approved by the City Council.	**Consistent.** As noted in Section 3.1, Aesthetics and Visual Resources, the development of the proposed industrial warehouses would be consistent with the City's design guidelines and would be located in an area of Tracy currently planned for and developed with similarly scaled warehouses and industrial.
CC-1.5-P1. New development shall locate and construct utilities underground.	**Consistent.** As noted in Chapter 2.0, Project Description, the proposed Project would connect to existing City infrastructure to provide water, sewer, and storm drainage utilities. Existing storm drain, sewer, water, and gas lines/pipes are currently located along West Schulte Road. The utilities improvements would be underground.
CC-3.1-P2. Identified cultural and historical landmarks and buildings shall be preserved.	**Consistent.** As noted in Section 3.5, Cultural and Tribal Resources, there are no historical structures or known cultural landmarks on-site. All impacts related to cultural and tribal resources, including but not limited to cultural resources and historical resources, would be less-than-significant or less-than-significant with mitigation included in Section 3.5.
CC-3.1-P3: New development, redevelopment, alterations, and remodeling projects should be sensitive to surrounding historic context.	**Consistent.** The Project would result in development of industrial uses in an area of the City which is largely developed with industrial uses, and in an area planned for future industrial development by the City. The Project would result in development of industrial uses on a site designated for industrial uses.
CC-3.1-P4: As part of the development review process, there shall be a standard condition of approval that if any resources are found during construction, all operations within the project area shall halt until an assessment can be made by appropriate professionals regarding the presence of archaeological and paleontological resources and the potential for adverse impacts on these resources.	**Consistent.** As noted previously, all impacts related to cultural and tribal resources, including but not limited to cultural resources and historical resources, would be less-than-significant or less-than-significant with mitigation included in Section 3.5. See Mitigation Measures 3.5-1 and 3.5-2.
CC-3.1-P5: Any archaeological or paleontological resources on private property shall be either preserved on their sites or adequately documented and conserved as a condition of removal. If any resources are found unexpectedly during development, then construction must cease immediately until accurate study and conservation measures are implemented.	**Consistent.** As noted in Section 3.6, Geology and Soils, there are no known paleontological resources on-site. Additionally, as noted in Section 3.5, Cultural and Tribal Resources, there are no known archaeological resources on-site. All impacts related to cultural and tribal resources, including but not limited to cultural resources and historical resources, would be less-than-significant or less-than-significant with mitigation included in Section 3.5 and 3.6.

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
CC-3.1-P6: If Native American artifacts are discovered on a site, the City shall consult representatives of the Native American community to ensure the respectful treatment of Native American sacred places.	**Consistent.** As noted in Section 3.5, Cultural and Tribal Resources, there are no known tribal resources on-site. All impacts related to cultural and tribal resources, including but not limited to tribal resources, would be less-than-significant or less-than-significant with mitigation included in Section 3.5. See Mitigation Measures 3.5-1 and 3.5-2.
CC-11.1.-P1. Employment Areas should contain one or more Focal Points such as a retail use, park or plaza.	**Consistent.** The proposed Project includes an industrial use which would result in employment on-site. While the size and type of planned and proposed industrial use is not necessarily appropriate for a retail use, park, or plaza, the Project does include features which benefit the future employees of the site. For example, landscaping would be provided throughout the Project site. The Project would provide a clearly-delineated, separate pedestrian pathway for employees connecting project buildings to the employee parking area and such pathway would include a lit crosswalk with flashing indicator lights where the path crosses vehicle routes. Additionally, an ADA-compliant pedestrian pathway would extend from each building to the northern property boundary, where it would connect to West Schulte Road. Further, the Project includes secure bicycle parking for employee bicycles at the front entry of each building which will be located indoors or covered and locker/shower facilities will be provided for employees who commute via bicycle. The proposed Project would also provide electrical outlets for charging of employee e-bikes. The Project would also participate in and offer all employees the opportunity to make use of a ride share program. Lastly, the applicant would provide on-site meal options for employees (e.g., micro market vending machines that offer drink and food for sale to employees, or food trucks [as regulated by Section 10.08.3193 – Mobile Food Vendors of the City's Municipal Code]) to minimize off-site employee trips during shifts.
CC-11.1.-P2. Focal Points in Employment Areas may be located on private or public property and are encouraged to be publicly accessible.	**Consistent.** As noted above, the Project includes features which benefit the future employees of the site. The site would be accessible to the public; however, due to the proposed Project use, it is not anticipated that members of the public would visit the Project site.
CC-11.2-P.1. Development in Employment Areas should adhere to high-quality design standards.	**Consistent.** As noted in Section 3.1, Aesthetics and Visual Resources, the development of the proposed industrial warehouses would be consistent with the City's design guidelines and would be located in an area of Tracy currently planned for and developed with similarly scaled warehouses and industrial. See Response to Policy CC-1.1-P3.
CC-11.2-P.6. Loading facilities in Employment Areas should be screened from view from public streets to the extent possible.	**Consistent.** As noted in Chapter 2.0, Project Description, the employee parking lot located on the north side of the site and adjacent to West Schulte Road includes a 30-foot landscape buffer area. Landscape buffers would be provided on all sides of the Project site to provide screening of the buildings and dock doors with various shade trees and drought tolerant shrubs and other vegetation. The preliminary landscape plan is shown in Figure 2.0-5.
CC-11.3-P.1. The impact of parking in Employment Areas on the pedestrian environment should be minimized with attractive landscaping.	**Consistent.** As noted above, landscaping would be provided throughout the site. The employee parking lot located on the north side of the site and adjacent to West Schulte Road includes a 30-foot landscape buffer area. Landscape buffers would be provided on all sides of the Project site to provide screening of the buildings and dock doors with various shade trees and drought tolerant shrubs and other vegetation. The preliminary landscape plan is shown in Figure 2.0-5.

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
CC-11.3-P.2. Parking lots should be set back from the street with a landscaped buffer wherever possible.	**Consistent.** As noted in Chapter 2.0, Project Description, parking areas would be provided throughout the site. The perimeter and parking lot landscaping would provide vegetated buffers that would include trees, tree canopies and other vegetation.
CC-11.3-P.3. Parking for alternative modes of transportation, such as preferential parking for carpool/vanpool, motorcycles or alternative fuel vehicles and bicycles, should be incorporated into parking plans for development projects in Employment Areas.	**Consistent.** As noted previously, the applicant would participate in and offer all employees the opportunity to make use of a ride share program. Bicycle parking would be provided in the employee parking lot and at the front entry of each building, lockers and shower facilities would be provided for employees that commute via bike and electrical outlets would be provided for charging employee e-bikes. Additionally, the Project would provide a clearly-delineated, separate pedestrian pathway for employees connecting project buildings to the employee parking area and such pathway would include a lit crosswalk with flashing indicator lights where the path crosses vehicle routes. Further, an ADA-compliant pedestrian pathway would extend from each building to the northern property boundary, where it would connect to West Schulte Road. Finally, priority parking would be provided for ADA stalls and for employee carpool vehicles and electric vehicle chargers would be installed in the same preferential parking location.
CIRCULATION	
CIR-1.2-P3: New development shall be designed to provide vehicular, bicycle and pedestrian connections with adjacent developments.	**Consistent.** The proposed Project provides vehicular, bicycle, and pedestrian connections. Vehicle ingress/egress to/from the Project site will occur from three points along West Schulte Road. The main entry and exit point for employee vehicles would be located at the center of the site, at the existing signalized Bud Lyons Way intersection. Additionally, an ADA-compliant pedestrian pathway would extend from each building to the northern property boundary, where it would connect to West Schulte Road. Further, bicycle parking would be provided in the employee parking lot and at the front entry of each building together with electrical outlets to charge e-bikes and locker/shower facilities for employees that commute by bike.
CIR-1.3-P7. Traffic studies for new developments within the City may be prepared if necessary and appropriate to determine the impacts of the project's traffic on the transportation system.	**Consistent.** Appendix F of the Draft EIR includes the traffic analysis for the Project. The traffic analysis is incorporated into Section 3.13, Transportation and Circulation, of the Draft EIR.
CIR-3.1-P6: New development shall include pedestrian and bicycle facilities internal to the development and that connect to citywide facilities, such as parks, schools and recreational corridors, as well as adjacent development and other services.	**Consistent.** As noted previously, an ADA-compliant pedestrian pathway would extend from each building to the northern property boundary, where it would connect to West Schulte Road. Additionally, bicycle parking would be provided in the employee parking lot and at the front entry of each building together with electrical outlets to charge e-bikes and locker/shower facilities for employees that commute by bike. There are no parks, schools, or recreational corridors in the Project vicinity.
CIR-3.1-P7: New development sites for commercial, employment, educational, recreational and park-and-ride land uses shall provide bicycle parking and/or storage facilities.	**Consistent.** Bicycle parking would be provided in the employee parking lot and at the front entry of each building together with electrical outlets to charge e-bikes and locker/shower facilities for employees that commute by bike.
OPEN SPACE & CONSERVATION	
OSC-1.1-P-1. New development shall meet all federal, State and	**Consistent.** Impacts related to habitat and species are described in Section 3.4, Biological Resources, of the Draft EIR. Section 3.4.2,

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
regional regulations for habitat and species protection.	Regulatory Setting, describes the federal, State and regional regulations for habitat and species protection. The analysis in this section of the Draft EIR discusses special-status species, wetlands regulations, and other applicable regulations. The Project would be subject to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) requirements. See Mitigation Measure 3.4-1.
OSC-1.1-P-3. New development should incorporate native, drought tolerant vegetation into landscape plans and reduce the use of invasive, non-native plant species.	**Consistent.** As noted in Chapter 2.0, Project Description, the landscape plan includes a mix of drought-tolerant shrubs and grasses, and a variety of shade trees appropriate for the climate in Tracy would be used throughout the parking lots and along the Project perimeter. The preliminary landscape plan is shown in Figure 2.0-5.
OSC-2.2-P1. Development projects shall have buffer zones, such as roads, setbacks and other physical boundaries, between agricultural uses and urban development. These buffer zones shall be of sufficient size to protect the agriculture operations from the impacts of incompatible development and shall be established based on the proposed land use, site conditions and anticipated agricultural practices. Buffers shall be located on the land where the use is being changed, and shall not become the maintenance responsibility of the City.	**Consistent.** As noted in Section 3.2, Agricultural Resources, neither the City's Right-to-Farm Ordinance nor its General Plan Policies define the width or specifics of desired buffer types for agricultural uses. Most of the proposed development would be buffered from existing agricultural operations by Old Schulte Road on the northern side of the Project site and by the Delta Mendota Canal on the southern side of the Project site. Additionally, the proposed Project includes parking areas, stormwater drainage areas, and landscaping along the perimeter of the site. These areas would provide a buffer between agricultural uses and the Project site. Further, land opposite Old Schulte Road to the north of the Project site is within the recently approved Cordes Ranch Specific Plan, which plans for the development of a 1,780-acre commerce and business park, consisting of 55.1 acres of General Commercial uses, 152.2 acres of General Office uses, 1,476.9-acres of Business Park Industrial uses, and 96.3-acres of Park uses. However, the agricultural land to the west and east of the Project site would not be buffered from the proposed industrial development. As discussed previously, the City's Right to Farm Ordinance is intended to reduce the occurrence of such conflicts between nonagricultural and agricultural land uses within the City through requiring the transferor of any property in the City to provide a disclosure statement describing that the City permits agricultural operations, including those that utilize chemical fertilizers and pesticides. Compliance with the City's Right to Farm Ordinance would be ensured through Mitigation Measure 3.2-1. Implementation of Mitigation Measure 3.2-1 would ensure that the Project includes adequate measures to buffer Project uses from adjacent agricultural uses and would help to reduce adverse effects on neighboring agricultural uses. The proposed project is not anticipated to lead to the permanent indirect conversion of offsite agricultural lands to a non-agricultural use. The project would not extend infrastructure or roadway access to offsite agricultural lands. Implementation of Mitigation Measure 3.2-1 would ensure that the Project applicant complies with the County's right-to-farm ordinance due to the potential conflicts between the proposed residences in the southern and western portions of the Plan Area and the existing agricultural operations to the south and west of the Plan Area. Implementation of this mitigation measure would ensure that impacts associated with the potential to result in conflicts with adjacent agricultural lands or indirectly cause conversion of agricultural lands are less than significant.

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
PUBLIC FACILITIES	
PF-1.1-P2: Stormwater infrastructure shall minimize local flooding by attaining capacity that conforms to the Storm Drainage Master Plan and City Design Standards.	**Consistent.** As noted in Section 3.14, Utilities and Service Systems, of the Draft EIR, onsite storm drainage would be installed to serve the proposed Project. Development of the proposed Project would include construction of a new storm drainage system, including a drainage collection system, and detention basins. All on-site storm drainage runoff will be collected through drain inlets and catch basins along the streets, and conveyed via surface swales and underground trunk lines to detention and water quality basins. The storm water drainage detention basins will be constructed to meet the City of Tracy Standards. Discharge from the basins will be conveyed through controlled flow pumping facilities to existing City of Tracy and main storm drain laterals. It is anticipated that the detention basin identified as LW-11 located on the adjacent City land east of the Project site as planned in the Storm Drain Master Plan would also be utilized in the future. Pursuant to section 11.34.210 Design Standards of the City's Municipal Code, installation of the Project's storm drain system would be required to conform to the design criteria, standard plans and specifications and the inspection and testing procedures set forth in the applicable City public improvement design standards. Thus, the proposed storm drainage collection and detention system will be subject to the SWRCB and City of Tracy regulations, including: Tracy Municipal Code, Tracy Storm Drain Master Plan, 2012; Phase II, NPDES Permit Requirements; NPDES-MS4 Permit Requirements; and LID Guidelines. Further, Mitigation Measure 3.14-1 requires the Project applicant to install a drainage system that meets this performance standard and, prior to issuance of grading permits, provide a drainage plan and report to the City of Tracy for review and approval. The proposed Project would participate in the implementation of the storm drainage Master Plan through the payment of fees and/or the construction of Master Plan facilities with corresponding credits.
PF-1.1-P3: New permanent stormwater infrastructure shall be designed to serve dual purposes to the extent possible. This includes the following: o **Drainage facilities integrated into recreation corridors with bike paths, sidewalks, and landscaping.** o **Drainage channels integrated with transportation and environmental corridors** o **Stormwater detention basins shall incorporate active and passive recreation areas where feasible. These areas shall not count towards parks dedication requirements**	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project. The proposed stormwater plan is integrated with the proposed landscaped areas.
PF-1.1-P4: Design of storm drainage facilities shall be consistent with State and federal requirements, including NPDES requirements	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and would be consistent with State and federal requirements, including NPDES requirements.

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
PF-1.2-P1. Fire hazards shall be identified and mitigated during the project review and approval process.	**Consistent.** As discussed in the Initial Study (see Appendix A of the Draft EIR), impacts related to adopted emergency response plans, adopted emergency evacuation plans, and wildfires would be less than significant. Additionally, the Project site is not located within a very high fire hazard severity zone; therefore, the thresholds associated with the Project's proximity to state responsibility areas or lands classified as very high fire hazard severity zones are not applicable to the Project and there is no impact associated with these thresholds.
PF-2.1-P1: To the extent feasible, new development projects shall incorporate methods of reducing storm runoff within the project to reduce the requirements for downstream storm drainage infrastructure and improve stormwater quality.	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and reduce runoff within the site.
PF-2.1-P2: New storm drainage facilities shall meet adopted City standards, including the standards and policies contained in the Storm Water Management Plan, the Storm Drainage Master Plan, and the Parkways Design Manual.	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and would meet City standards.
PF-2.1-P3: New development projects shall only be approved if necessary stormwater infrastructure is planned and is in compliance with environmental regulations.	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and would meet City standards as well as federal NPDES standards.
PF-5.1-P5. Salvage and reuse of construction and demolition materials and debris is encouraged at all construction projects in the city.	**Consistent.** As noted in Chapter 2.0, Project Description, main building structures are comprised of pre-engineered systems that use 80 percent recycled steel. Additionally, insulated architectural metal wall panels contain approximately 76 percent of recycled material. Further, construction waste would be recycled whenever possible.
PF-5.1-P8. Residential, industrial, commercial and retail buildings should be designed or improved to accommodate an increase in the amount and type of recycled materials.	**Consistent.** As noted above, main building structures are comprised of pre-engineered systems that use 80 percent recycled steel, insulated architectural metal wall panels will contain approximately 76 percent of recycled material, and construction waste would be recycled whenever possible.
PF-6.3-P2. New developments shall dedicate land for utility infrastructure such as treatment facilities, tanks, pump stations and wells as needed to support the development of their project.	**Consistent.** As noted previously, onsite storm drainage would be installed to serve the proposed Project. Development of the proposed Project would include construction of a new storm drainage system, including a drainage collection system, and detention basins. All on-site storm drainage runoff will be collected through drain inlets and catch basins along the streets, and conveyed via surface swales and underground trunk lines to detention and water quality basins. The storm water drainage detention basins will be constructed to meet the City of Tracy Standards. Discharge from the basins will be conveyed through controlled flow pumping facilities to existing City of Tracy and main storm drain laterals. It is anticipated that the detention basin identified as LW-11 located on the adjacent City land east of the Project site as planned in the Storm Drain Master Plan would also be utilized in the future. The Project would also construct the necessary water and wastewater infrastructure on-site necessary to support the

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
	Project.
PF-6.3-P3. The City shall be responsible for constructing new transmission water lines, as needed to meet future needs. Individual development projects shall be responsible for the construction of all water transmission means.	**Consistent.** Utility extensions would be installed to provide services to the Project. Utility lines within the Project site and adjacent roadways would be extended throughout the Project site. Water lines would be connected via existing lines along West Schulte Road. Two-inch water lines are currently located along West Schulte Road. Water lines would be constructed on-site to serve the Project.
PF-6.3-P5. The availability of sufficient, reliable water shall be taken into account when considering the approval of new development.	**Consistent.** Appendix G of the Draft EIR includes a Water Supply Assessment for the Project. The Assessment was incorporated into Section 3.14, Utilities and Service Systems, of the Draft EIR. In conclusion, sufficient water is available to serve the Project. Impacts related to the availability and reliability of water supplies to serve the Project were determined to be less than significant.
PF-7.2-P3. The approval of new development shall be conditioned on the availability of sufficient capacity in the wastewater collection and treatment system to serve the project.	**Consistent.** As discussed in Section 3.14, Utilities and Service Systems, of the Draft EIR, impacts related to the wastewater collection and treatment capacity were determined to be less than significant.
PF-7.2-P5. New development shall fully fund the cost of new wastewater treatment and disposal facilities.	**Consistent.** Utility extensions would be installed to provide services to the Project. Utility lines within the Project site and adjacent roadways would be extended throughout the Project site. Wastewater lines would be connected via existing lines along West Schulte Road. The Project would fund and construct the required wastewater infrastructure on-site.
PF-8.1-P2. Stormwater infrastructure shall minimize local flooding by attaining capacity that conforms with the Storm Drainage Master Plan and City Design Standards.	**Consistent.** As noted previously, onsite storm drainage would be installed to serve the proposed Project. Development of the proposed Project would include construction of a new storm drainage system, including a drainage collection system, and detention basins. All on-site storm drainage runoff will be collected through drain inlets and catch basins along the streets, and conveyed via surface swales and underground trunk lines to detention and water quality basins. The storm water drainage detention basins will be constructed to meet the City of Tracy Standards. Discharge from the basins will be conveyed through controlled flow pumping facilities to existing City of Tracy and main storm drain laterals. It is anticipated that the detention basin identified as LW-11 located on the adjacent City land east of the Project site as planned in the Storm Drain Master Plan would also be utilized in the future. Pursuant to section 11.34.210 Design Standards of the City's Municipal Code, installation of the Project's storm drain system would be required to conform to the design criteria, standard plans and specifications and the inspection and testing procedures set forth in the applicable City public improvement design standards. Thus, the proposed storm drainage collection and detention system will be subject to the SWRCB and City of Tracy regulations, including: Tracy Municipal Code, Tracy Storm Drain Master Plan, 2012; Phase II, NPDES Permit Requirements; NPDES-MS4 Permit Requirements; and LID Guidelines. Further, Mitigation Measure 3.14-1 requires the Project applicant to install a drainage system that meets this performance standard and, prior to issuance of grading permits, provide a drainage plan and

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
	report to the City of Tracy for review and approval. The proposed Project would participate in the implementation of the storm drainage Master Plan through the payment of fees and/or the construction of Master Plan facilities with corresponding credits.
PF-8.1-P3. New permanent stormwater infrastructure shall be designed to serve dual purposes to the extent possible. This includes the following: **- Drainage facilities integrated into recreation corridors with bike paths, sidewalks and landscaping.** **- Drainage channels integrated with transportation and environmental corridors.** **- Storm water detention basins shall incorporate active and passive recreation areas where feasible. These areas shall not count towards parks dedication requirements.**	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project. The proposed stormwater plan is integrated with the proposed landscaped areas.
PF-8.1-P6. Design of storm drainage facilities shall be consistent with State and federal requirements, including NPDES requirements.	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and would be consistent with State and federal requirements, including NPDES requirements.
PF-8.2-P1. To the extent feasible, new development projects shall incorporate methods of reducing storm runoff within the project to reduce the requirements for downstream storm drainage infrastructure and improve stormwater quality.	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and reduce runoff within the site.
PF-8.2-P2. New storm drainage facilities shall meet adopted City standards, including the standards and policies contained in the Storm Water Management Plan, the Storm Drainage Master Plan and the Parkways Design Manual.	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and would meet City standards.
PF-8.2-P3. New development projects shall only be approved if necessary, stormwater infrastructure is planned and is in compliance with environmental regulations.	**Consistent.** As noted above, onsite storm drainage would be installed to serve the proposed Project and would meet City standards as well as federal NPDES standards.
SAFETY	
SA-1.1-P1. Underground utilities, particularly water and natural gas mains, shall be designed to withstand seismic forces.	**Consistent.** As noted in Chapter 2.0, Project Description, the proposed Project would connect to existing City infrastructure to provide water, sewer, and storm drainage utilities. Existing storm drain, sewer, water, and gas lines/pipes are currently located along West Schulte Road. The utilities improvements would be underground.
SA-1.1-P2. Geotechnical reports shall be required for development in areas where potentially serious geologic risks exist. These reports should address the degree of hazard, design parameters for the project	**Consistent.** A Geotechnical Review is included as Appendix C of the Draft EIR. The results and recommendations of the Review are included in Section 3.6, Geology and Soils, of the Draft EIR.

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
based on the hazard, and appropriate mitigation measures.	
SA-1.2-P1. All construction in Tracy shall conform to the California Building Code and the Tracy Municipal Code including provisions addressing unreinforced masonry buildings.	**Consistent.** As noted in Section 3.6, Geology and Soils, of the Draft EIR, the Project would be required to be constructed using standard engineering and seismic safety design techniques of the California Building Code. The Project would also be subject to the City's Municipal Code requirements applicable to the Project.
SA-4.1-P2. When reviewing applications for new development and redevelopment in areas historically used for commercial or industrial uses, developers shall conduct the necessary level of environmental investigations to ensure that soils, groundwater and buildings affected by hazardous material releases from prior land uses and lead or asbestos potentially present in building materials, will not have a negative impact on the natural environment or health and safety of future property owners or users.	**Consistent.** A Phase I Environmental Site Assessment (ESA) is included as Appendix D of the Draft EIR. The results and recommendations of the ESA are included in Section 3.8, Hazards and Hazardous Materials, of the Draft EIR.
AIR QUALITY	
AQ-1.1-P4. Employment areas should include a mix of support services to minimize the number of trips.	**Consistent.** The proposed Project includes an industrial use which would result in employment on-site. The Project includes features which benefit the future employees of the site and minimize off-site trips. For example, the Project includes bicycle parking as well as e-bike charging and locker/shower facilities for employees that commute by bike and the Project would participate in and offer all employees the opportunity to make use of a ride share program. Additionally, the applicant would provide on-site meal options for employees (e.g., micro market vending machines that offer drink and food for sale to employees, or food trucks [as regulated by Section 10.08.3193 – Mobile Food Vendors of the City's Municipal Code]) to minimize off-site employee trips during shifts.
AQ-1.2-P1. The City shall assess air quality impacts using the latest version of the CEQA Guidelines and guidelines prepared by the San Joaquin Valley Air Pollution Control District.	**Consistent.** The air quality impacts of the Project are discussed in Section 3.3, Air Quality, of the Recirculated Draft EIR. The analysis uses the latest version of the CEQA Guidelines and guidelines prepared by the San Joaquin Valley Air Pollution Control District.
AQ-1.2-P2. The City shall assess through the CEQA process any air quality impacts of development projects that may be insignificant by themselves, but cumulatively significant.	**Consistent.** The air quality impacts of the Project are discussed in Section 3.3, Air Quality, of the Recirculated Draft EIR. The cumulative air quality impacts of the Project are discussed in Chapter 4.0, Other CEQA-Required Topics, of the Recirculated Draft EIR.
AQ-1.2-P3. Developers shall implement best management practices to reduce air pollutant emissions associated with the construction and operation of development projects.	**Consistent.** As discussed in Chapter 2.0, Project Description, the Project applicant has committed to a variety of construction- and operation-related Project features with the goal to reduce Project emissions, reduce energy consumption and/or promote sustainability. Some of the significant practices that Costco would incorporate into its new buildings and overall operations that help

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
	reduce emissions and conserve energy and other natural resources are discussed on pages 2.0-4 through 2.0-7. Additionally, Mitigation Measure 3.3-1 requires that, during Project operation, operators of heavy-duty trucks that travel to and from the Project site are required to use trucks that have 2010 model year or newer engines that meet the CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions, or newer, cleaner trucks and equipment.
AQ-1.2-P4. New development projects should incorporate energy efficient design features for HVAC, lighting systems and insulation that exceed Title 24.	**Consistent.** As discussed in Section 3.3, Air Quality, of the Recirculated Draft EIR, the site's building energy efficiency would exceed Title 24 Building Envelope Energy Efficiency Standards by at least 1%. Additionally, all appliances to be installed would meet or exceed Title 24 requirements.
AQ-1.2-P6. Installation of solar voltaic panels on new homes and businesses shall be encouraged.	**Consistent.** As discussed in Section 3.3, Air Quality, of the Recirculated Draft EIR, solar PV panels would be installed on the roof of the buildings and/or elsewhere on site (e.g., awnings or canopies in parking areas) to generate approximately 3 MW of renewable electricity for use on site. Batteries would also be installed to store some of that electricity for on-site energy needs.
AQ-1.2-P7. Trees should be planted on the south- and west-facing sides of new buildings or buildings undergoing substantial renovation in order to reduce energy usage.	**Consistent.** As discussed in Chapter 2.0, Project Description, site perimeter and parking lot landscaping would provide vegetated buffers that would include trees, tree canopies and other vegetation.
AQ-1.2-P9. New developments shall follow the current requirements of the SJVAPCD with respect to wood burning fireplaces and heaters.	**Consistent.** Wood burning fire places and heaters would not be installed as part of the Project.
AQ-1.2-P12. New sources of toxic air pollutants shall prepare a Health Risk Assessment as required under the Air Toxics "Hot Spots" Act and, based on the results of the Assessment, establish appropriate land use buffer zones around those areas posing substantial health risks.	**Consistent.** As discussed in Section 3.3, Air Quality, of the Recirculated Draft EIR, an air toxics health risk assessment was conducted utilizing Lakes Environmental Software AERMOD and the CARB's Hotspots Analysis Reporting Program Version 2 (HARP 2) Air Dispersion, Modelling, and Risk Tool (ADMRT) for the DPM associated with the heavy-duty trucks. Emissions associated with truck idling and truck on-site travel were calculated. The maximum residential (70-year exposure) cancer, workplace (40-year exposure) cancer, chronic (non-cancer), and acute (non-cancer) risks were assessed and compared to SVJAPCD thresholds. See Appendix A.3 of this Recirculated Draft EIR for full model inputs. Table 3.3-15 summarizes the results of the analysis. The maximum residential cancer risk would occur at a residence located on Hansen Road, to the west of the Project site (at 25730 Hansen Road), at a total of approximately 1.66 per million. The maximum workplace cancer risk would occur at the northern entrance to the Project site, along Schulte Road, with a maximum risk of up to 0.81 per million (at the location of maximum workplace cancer risk). These risks are well below the applicable SJVAPCD thresholds. As shown in Table 3.3-15, which identifies the combined health risks associated with both construction and operational, the proposed Project, in and of itself, would not result in a significant increased exposure of receptors to localized concentrations of TACs. Risk of residential cancer risk, workplace cancer risk, and chronic and acute non-cancer risks are below the applicable SJVAPCD TAC thresholds.

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
	It is also noted that the City is currently processing an application to annex this adjacent property into the City and develop a proposed one-story, approximately 217,466 square foot industrial warehouse and associated truck trailer and employee parking lots thereon. As part of this application, if approved, the single-family residence would be demolished prior to redevelopment of the site. The Notice of Preparation for this project, the Schulte Road Warehouse, was released in December 2023.
AQ-1.2-P13. Dust control measures consistent with San Joaquin Valley Air Pollution Control District rules shall be required as a condition of approval for subdivision maps, site plans, and all grading permits.	**Consistent.** As discussed in Section 3.3, Air Quality, of the Recirculated Draft EIR, prior to the issuance of a Grading Permit for each phase of the Project, the Project Proponent shall prepare and submit a Dust Control Plan that meets all of the applicable requirements of APCD Rule 8021, Section 6.3. Additionally, the Project would be required to implement dust control measures that include application of water or chemical dust suppressants to unpaved roads and graded areas, covering or stabilization of transported bulk materials, prevention of carryout or trackout of soil materials to public roads, limiting the area subject to soil disturbance, construction of wind barriers, access restrictions to inactive sites, as required by the applicable rules. The Project would also be required to, during all construction activities, implement the dust control practices identified in Tables 6-2 and 6-3 of the GAMAQI (2002).
AQ-1.2-P14. Developments that significantly impact air quality shall only be approved if all feasible mitigation measures to avoid, minimize or offset the impact are implemented.	**Consistent.** As discussed in Section 3.3, Air Quality, of the Recirculated Draft EIR, the Project incorporates various policy and rule-required implementation measures that would reduce related emissions, including all of the current Air District rules and regulations. For example, the proposed Project would be required to implement Air District Rule 9510, which ensures that the Project would fulfill the Air District's emissions reduction commitments in the relevant PM10 and Ozone Attainment plans. In addition, the Project would comply with all applicable stationary source permitting rules implemented by SJVAPCD, which further confirms the Project would not cause or contribute to any ambient air quality standard exceedances. Nevertheless, for the sake of a conservative assessment, the proposed Project's potential impact to this environmental topic is considered significant and unavoidable. Therefore, the proposed Project would be required to implement the suite of Mitigation Measures in 3.3-1 through 3.3-36. Additionally, the operational emissions shown therein would exceed the SJVAPCD's significance thresholds for NOx. This impact would be significant and unavoidable. Therefore, the proposed Project would be required to implement the suite of Mitigation Measures in 3.3-1 through 3.3-36.
AQ-1.2-P15. Encourage businesses to electrify loading docks or implement idling-reduction systems so that trucks transporting refrigerated goods can continue to power cab cooling elements during loading, layovers, and rest periods.	**Consistent.** As described on page 3.3-29 of the Recirculated Draft EIR, the proposed Project would include electric charging infrastructure that would be installed on the property to facilitate the conversion of the truck fleet to zero-emission electric trucks as they become available in the market and used for truck deliveries to and from the facility, including the installation of conduit for electric vehicle charging stations onsite to serve 50% of the number of truck docking stations. Moreover, also described on page 3.3-39 of the Recirculated Draft EIR, Costco trucks would be equipped with engine

GENERAL PLAN POLICY	*PROJECT CONSISTENCY*
	idle shut off timers and appropriate training would be provided and signage would be installed to ensure that all truck idling is limited to a maximum of two minutes. Furthermore, as described on page 3.3-30 of the Recirculated Draft EIR, all exclusively onsite vehicles (i.e., forklifts, yard goats, pallet jacks, etc.) would be electric or zero-emission vehicles. The proposed Project also anticipates further electrification of its loading docks over time (subject to market demand), so that trucks transporting refrigerated goods can continue to power cab cooling elements with electricity, during loading, layovers, and rest periods.
AQ-1.3-P3. The City shall encourage employers to establish Transportation Demand Management programs.	**Consistent.** As discussed in Section 3.13, Transportation and Circulation, of the Draft EIR, the Project applicant would be required to implement feasible Transportation Demand Management (TDM) strategies, which would decrease the VMT generated by the Project by 15 percent. See Mitigation Measure 3.13-1.
AQ-1.3-P5. The City shall require direct pedestrian and bicycle linkages from residential areas to parks, schools, retail areas, high-frequency transit facilities and major employment areas.	**Consistent.** The proposed Project incorporates pedestrian and bicycle facilities/linkages. As noted in Chapter 2.0, Project Description, the Project would provide a clearly-delineated, separate pedestrian pathway for employees connecting project buildings to the employee parking area and such pathway would include a lit crosswalk with flashing indicator lights where the path crosses vehicle routes. Additionally, an ADA-compliant pedestrian pathway would extend from each building to the northern property boundary, where it would connect to West Schulte Road.
NOISE	
P2. Mitigation measures shall be required for new development projects that exceed the following criteria: • **Cause the Ldn at noise-sensitive uses to increase by 3 dB or more and exceed the "normally acceptable" level.** • **Cause the Ldn at noise-sensitive uses to increase 5 dB or more and remain "normally acceptable."** • **Cause new noise levels to exceed the City of Tracy Noise Ordinance Limits.**	**Consistent.** As discussed in Section 3.11, Noise, based upon Figure 3.11-3, the proposed Project is predicted to generate maximum noise levels of approximately 68 dBA Lmax at the residential uses to the west of the Project site. This would comply with the San Joaquin County maximum noise level limits of 70 dBA Lmax during daytime hours but would exceed the County's 65 dBA Lmax standard during nighttime hours. In order to reduce project-related operational noise levels at an adjacent sensitive receptor, Saxelby Acoustics used the Sound PLAN noise model to evaluate the use of noise barriers for reducing project-related noise levels at the adjacent residential uses. Figure 3.11-4 shows the exterior noise levels in terms of the peak hour average (Leq) noise level, with a 20-foot-tall acoustically absorbent screen wall located along the western boundary of the Project site. The resulting noise levels of up to 50 dBA Leq would comply with the County's 50 dBA Leq daytime standard but would still exceed the County's 45 dBA Leq nighttime noise standard. As such, a sound wall would not result in noise levels at or below the County's nighttime noise standard. Therefore, the County's exterior noise standards would still be exceeded and this would be a significant and unavoidable impact. Mitigation Measure 3.11-2 is required.
P4. All construction in the vicinity of noise sensitive land uses, such as residences, hospitals, or convalescent homes, shall be limited to daylight hours or 7:00 a.m. to 7:00 p.m. In addition, the following construction noise control measures shall be included as requirements at construction sites to minimize	**Consistent.** As discussed in Section 3.11, Noise, compliance with the City's permissible hours of construction, as well as implementing the best management noise reduction techniques and practices (both outlined in Mitigation Measure 3.11-1), would ensure that construction noise would not result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors. Therefore, with implementation of Mitigation Measure 3.11-1, temporary construction noise impacts would be less than significant.

GENERAL PLAN POLICY	PROJECT CONSISTENCY
construction noise impacts: • **Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.** • **Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction area.** • **Utilize "quiet" air compressors and other stationary noise sources where technology exists.**	

SOURCE: DE NOVO PLANNING GROUP, 2024.

The proposed Project is substantially consistent with the Tracy General Plan land use requirements and would have a ***less than significant*** impact relative to the Tracy General Plan.

3.11 NOISE

No changes were made to Section 3.11 of the Draft EIR.

3.12 PUBLIC SERVICES

No changes were made to Section 3.12 of the Draft EIR.

3.13 TRANSPORTATION AND CIRCULATION

The following changes were made to page 3.13-10 of the Draft EIR:

> The third access driveway located at the Project site's northeast boundary includes a new signalized intersection and a deceleration lane for trucks traveling eastbound on West Schulte Road. This driveway would be the entrance for all truck traffic. A shared accessway to the adjacent parcel to the east is also provided with a left-hand turn pocket to provide access to the parcel. The deceleration lane at the eastern intersection will allow for the safe entry of warehouse trucks to access the loading docks and trailer parking surrounding the buildings. The new intersection provides the only truck access to the site, and also allows for a secondary exit for the warehouse trucks. This truck entrance/exit provides ~~two~~ three inbound lanes, each of approximately 2,300-feet, for trucks entering and one lane for trucks exiting the facility and includes a security building and security gates. Approximately 61 trucks could queue within the inbound lanes without spilling back to the new signalized intersection or the shared intersection for the parcel to the east.

The following changes were made to pages 3.13-13 through 3.13-17 of the Draft EIR:

The TDM Program for the proposed Project recommends TDM measures that would individually reduce the Project's VMT and trips with the goal of obtaining a feasible maximum of 15 percent VMT reduction. Table 3.13-2 lists the TDM measures that could partially mitigate the Project's VMT impact. ~~And t~~The table also includes a column for those ~~two~~ 11 TDM measures that have been deemed feasible by the applicant. It is noted that not all of the TDM measures listed in the table have been deemed feasible for the proposed Project.

TABLE 3.13-2: TDM MEASURES

TDM MEASURE	*DESCRIPTION*	*MAX. VMT REDUCTION*	*MEASURES DETERMINED TO BE FEASIBLE BY THE APPLICANT*	*VMT REDUCTION APPLIED*
PARKING STRATEGIES				
Reduce Parking Supply	Reduce the number of available parking spots provided to employees.	1%	X	1~~0~~%
Unbundle Parking	Remove free parking at the site, and charge employees for parking. The higher the cost of parking, the higher the reduction.	1%		0%
Parking Cash-out	Provide employees a choice of forgoing current parking for a cash payment to be determined by the employer. The higher the cash payment and eligible employees, the higher the reduction.	2%		0%
PARKING STRATEGIES				
Transit Stops	Coordinate with local transit agency to provide bus stop near the site. Real time transportation information displays support on-the-go decision making to support sustainable trip making.	1%		0%
Implement Neighbor-hood Shuttle	Implement project-operated or project-sponsored neighborhood shuttle serving residents, employees, and visitors of the project site.	2%		0%
Transit Subsidies	Involves the subsidization of transit fare for residents and employees of the project site. This strategy assumes transit service is already present in the project area. Pays for employees to use local transit. This could either be a discounted ticket or a full-reimbursed transit ticket.	2%		0%
COMMUNICATION & INFORMATION STRATEGIES				
Travel Behavior Change Program	Involves the development of a travel behavior change program that targets individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits. Provide a website that allows employees to research other modes of transportation for commuting. Employee-focused travel behavior change programs target individuals' attitudes, goals, and travel behaviors, educating participants on the impacts of their travel choices and the opportunities to alter their habits.	1%	X	1~~0~~%

TDM Measure	*Description*	*Max. VMT Reduction*	*Measures Determined to be Feasible by the Applicant*	*VMT Reduction Applied*
Promotions & Marketing	Involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices with passive educational and promotional materials. Marketing and public information campaign to promote awareness of TDM program with an on-site coordinator to monitor program.	1%	X	1~~0~~%
Commuting Strategies				
Employer Sponsored Vanpool or Shuttle	Implementation of employer-sponsored employee vanpool or shuttle providing new opportunities for access to connect employees to the project site.	2%		0%
Emergency Ride Home (ERH) Program	Provides an occasional subsidized ride to commuters who use alternative modes. Guaranteed ride home for people if they need to go home in the middle of the day due to an emergency or stay late and need a ride at a time when transit service is not available.	1%	X	1%
Tele-commuting Alternative work schedule	Four-Ten work schedule results in 20% weekly VMT reduction, 10% trip reduction equals 15% VMT reduction.	7%		0%
On-site Childcare	Provides on-site childcare to remove the need to drive a child to daycare at a separate location.	1%		0%
Shared Mobility Strategies				
Ride Share Program	Increases vehicle occupancy by providing ride-share matching services, designating preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles, and providing a website or message board to connect riders and coordinate rides. Need a point person form the business on-site.	2%	X	20%
Employee/ Employer Car Share	Implement car sharing to allow people to have on-demand access to a vehicle, as-needed. This may include providing membership to an existing program located within 1/4 mile, contracting with a third-party vendor to extend membership-based service to an area, or implementing a project-specific fleet that supports the residents and employees on -site.	1%		0%
Designated Parking Spaces for Car Share Vehicles	Implement car sharing to allow people to have on-demand access to a vehicle, as-needed. This may include providing membership to an existing program located within 1/4 mile, contracting with a third-party vendor to extend membership-based service to an area, or implementing a project-specific fleet that supports the residents and employees on -site.	1%	X	1%
Bicycle Infrastructure Strategies				
Bike Share Program	Participate in a bike share program/On site bike share program.	1%		0%
Implement/ Improve On-	Implements or provides funding for improvements to corridors and crossings for bike networks identified	1%		0%

TDM MEASURE	*DESCRIPTION*	*MAX. VMT REDUCTION*	*MEASURES DETERMINED TO BE FEASIBLE BY THE APPLICANT*	*VMT REDUCTION APPLIED*
street Bicycle Facility	within a one-half mile buffer area of the project boundary, to support safe and comfortable bicycle travel.			
Include Bike Parking Per City Code	Implements short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations.	1%	X	10%
Include Secure Bike Parking and Showers	Implements additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel.	1%	X	10%
Bicycle Repair Station/ Services	On-site bicycle repair tools and space to use them supports on-going use of bicycles for transportation.	1%	X	10%
NEIGHBORHOOD ENHANCEMENT STRATEGIES				
Traffic Calming Improve-ments	Implement traffic calming improvements on streets and intersections throughout and around the project site.	1%		0%
Pedestrian Network Improve-ments	Implement pedestrian network improvements throughout and around the project site that encourages people to walk.	2%	X	20%
MISCELLANEOUS STRATEGIES				
Virtual Care Strategies for Hospitals	Implement options for virtual care for health services for hospitals.	2%		0%
On-Site Affordable Housing	Provide a percentage of on-site affordable housing for employees that is less than 100%.	1%		0%
Job Creation Land Use (e.g. Office)	Provide offices or other job creation land use. Applies to housing projects.	3%		0%
Provide On-Site Meals	Provide on-site meal options for employees (e.g., micro market vending machines or food trucks)	*		0%
			TOTAL VMT REDUCTION APPLIED	**12%**

SOURCE: KIMLEY HORN, 2022.

The above is TDM program strategies aims to achieve a feasible maximum of 2 12 percent VMT reduction, with the opportunity for 13 3 percent VMT reduction coming from the VMT Banking Fee Program as discussed below.

In the case that the VMT Banking Fee Program is not in place, the TDM program will need to achieve the full 15 percent.

The City of Tracy's Draft VMT Mitigation Banking Fee Program is a programmatic approach to respond to the need for feasible VMT mitigation programs. Programmatic approaches

that rely on collectively funding larger projects allow a project to obtain an amount of mitigation commensurate with their impact, include only a single payment without the complexity of ongoing management, and do not require on-going mitigation monitoring. Programmatic approaches can also provide a public benefit in terms of funding transportation improvements that would not otherwise be constructed, resulting in improvements to congestion, GHG emissions, increased transportation choices, and additional opportunities for active transportation.

The Draft VMT Mitigation Banking Fee Program calculates the cost per VMT reduction as $633.11. Therefore, to achieve a 13 percent reduction needed after implementation of the TDM program, the Project would be responsible to pay $117,758.46~~510,286.66~~. Since there are 250 employees, each employee's VMT needs to be reduced by 0.744~~3.224~~ VMT at a cost of $633.11 per VMT the calculation is as follows:

VMT Banking Fee = 250 employees x ~~3.224~~0.744 VMT per employee x $633.11 per VMT.

Mitigation Measure 3.13-1, which requires travel demand management (TDM) strategies, would be required. Implementation of Mitigation Measure 3.13-1 is feasible because it is within the applicant's purview to implement and the TDM measures have been found effective in previous academic studies. However, the precise effectiveness of specific TDM strategies can be difficult to accurately measure due to a number of external factors such as employee responses to strategies and changes to technology.

As part of Mitigation Measure 3:13-1, the proposed Project would be required to monitor and evaluate the effectiveness of the Project's TDM Plan and provide the results to the City of Tracy. Based on the results of the evaluation, modifications to the TDM Plan may be required by the City in order to improve effectiveness toward achieving the home-based work VMT per worker target.

Based on the above, even with the implementation of Mitigation Measure 3.13-1, the impact would remain ***significant and unavoidable*** when compared to the City of Tracy's VMT threshold of significance.

MITIGATION MEASURE(S)

Mitigation Measure 3.13-1: *The Project applicant shall implement feasible Transportation Demand Management (TDM) strategies, which would decrease the VMT generated by the Project by 15 percent. Specific potential TDM strategies include, but are not limited to, the following:*

- *Reduce Parking Supply*
- *Travel Behavior Change Program*
- *Promotions and Marketing*
- *Emergency Ride Home (ERH) Program*
- *Ride Share Program*

- *Designated Parking Spaces for Car Share Vehicles*
- *Include Bike Parking Per City Code*
- *Include Secure Bike Parking and Showers*
- *Bicycle Repair Station/Services*
- *Pedestrian Network Improvements*
- *Provide On-Site Meals*

The TDM Plan shall be submitted to the City for review prior to approval of improvement plans, and the effectiveness of the TDM Plan shall be evaluated, monitored, and revised, if determined necessary by the City. The TDM Plan shall include the TDM strategies that will be implemented during the lifetime of the proposed Project and shall outline the anticipated effectiveness of the strategies. The anticipated effectiveness of the TDM Plan may be monitored through annual surveys to determine employee travel mode split and travel distance for home-based work trips, and/or the implementation of technology to determine the amount of traffic generated by and home-based work miles traveled by employees, which shall be determined in coordination with the City. The frequency and duration of the anticipated effectiveness would depend on the ultimate strategy determined in coordination with the City. Additionally, should the initial TDM Plan submitted to the City for review be projected to fall short of achieving a 15 percent decrease in VMT, the Project applicant shall pay any VMT banking fee in effect at the time of building permit issuance to secure VMT credits of a total of 15 percent for the subject building, taking into account the stated percent efficacy for the TDM measures above. Should the initial TDM Plan submitted to the City for review be projected to fall short of achieving a 15 percent decrease in VMT and a VMT banking fee is not in effect at the time of building permit issuance, the Project applicant shall make a one-time contribution to the City of Tracy transit service provider, TRACER, equal to the amount that would be calculated using the City's draft VMT banking fee of $633.11 per VMT, as documented in the Transportation and Circulation section of the Draft EIR, to enable opportunity of transit services that would benefit the Tracy community in perpetuity and overcome the TDM Plan's shortfall in projected VMT reduction.

3.14 UTILITIES AND SERVICE SYSTEMS

No changes were made to Section 3.14 of the Draft EIR.

4.0 OTHER CEQA-REQUIRED TOPICS

No changes were made to Chapter 4.0 of the Draft EIR.

5.0 ALTERNATIVES TO THE PROPOSED PROJECT

No changes were made to Chapter 5.0 of the Draft EIR.

6.0 REPORT PREPARERS

No changes were made to Chapter 6.0 of the Draft EIR.

7.0 REFERENCES

No changes were made to Chapter 7.0 of the Draft EIR.

8.0 APPENDICES

The Appendix updated to include a revised Traffic Study.

This page left intentionally blank.

APPENDIX A

Costco Facilities Project Plans

NEW COSTCO FACILITIES

DEVELOPMENT REVIEW

16000 WEST SCHULTE ROAD, TRACY, CA

AUGUST 7, 2024

RECEIVED
August 8, 2024
City of Tracy
Community and Economic Development

PROJECT DIRECTORY

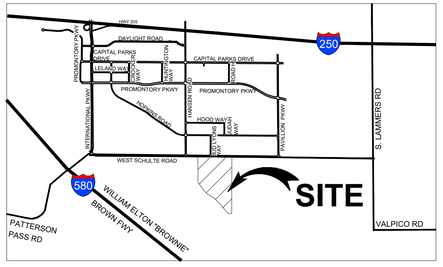
APPLICANT:
COSTCO WHOLESALE
999 LAKE DRIVE
ISSAQUAH, WA 98027
PHONE: (425) 785-5344
CONTACT: CHRISTINE LASLEY

CIVIL ENGINEER/SURVEY:
WARE MALCOMB
4683 CHABOT DRIVE, SUITE 300
PLEASANTON, CA 94588
PHONE: (925) 480-6154
CONTACT: JON LORENZO

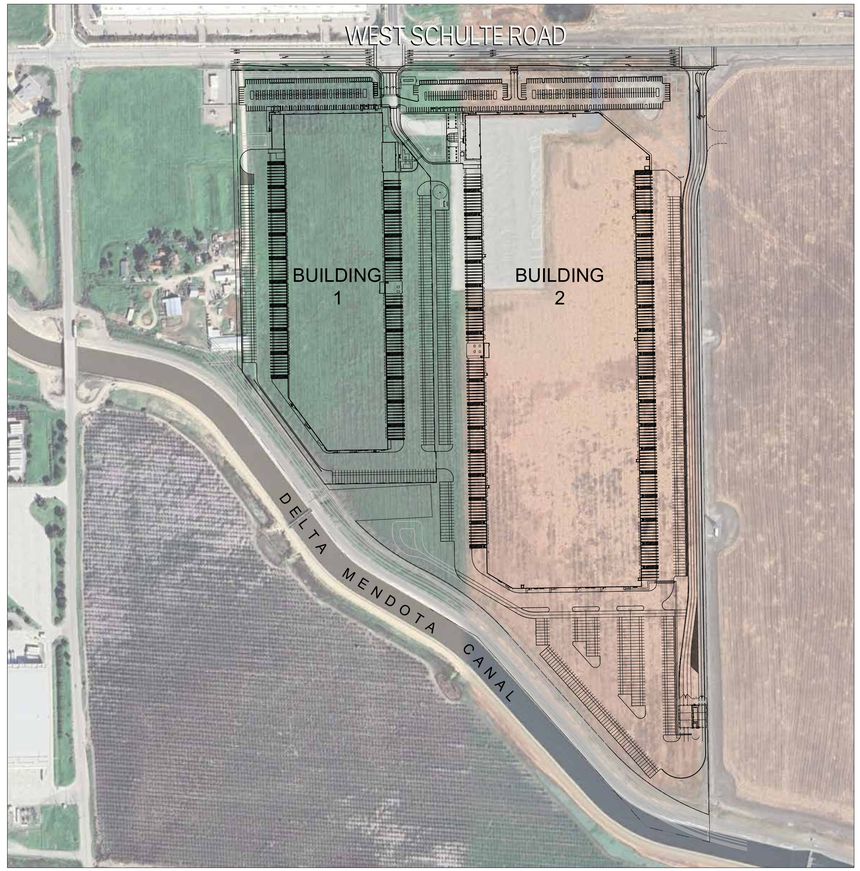
LANDSCAPE ARCHITECT:
DAVID BABCOCK & ASSOCIATES
3581 MT. DIABLO BLVD, SUITE 235
LAFAYETTE, CA 94549
PHONE: (925) 283-5070
CONTACT: JEFF BERBERICH

ARCHITECTS:
WARE MALCOMB
4683 CHABOT DRIVE, SUITE 300
PLEASANTON, CA 94588
PHONE: (925) 368-1327
CONTACT: REGI RUNNELS

DAVID BABCOCK + ASSOCIATES
3581 MOUNT DIABLO BLVD, SUITE 235
LAFAYETTE, CA 94549
PHONE: (925) 283-5070
CONTACT: JEFF BERBERICH



VICINITY MAP
N.T.S.
NORTH



LOCATION MAP
N.T.S.
NORTH

PROJECT DATA

PROJECT LOCATION :	16000 WEST SCHULTE ROAD, TRACY, CA 95377
APN :	209-230-020-000
CURRENT ZONING :	AGRICULTURE
PROPOSED ZONING:	M1 - LIGHT INDUSTRAIL
JURISDICTION :	EXISTING: SAN JOAQUIN COUNTY, CA
	PROPOSED: CITY OF TRACY, CA
GROSS SITE AREA:	±104 AC
ROAD DEDICATION:	± 8.8 AC (383,050 SF.)
NET SITE AREA:	± 95.2 AC
BOUNDARIES INFORMATION :	THIS PLAN HAS BEEN PREPARED USING THE SITE DATA FROM KIER & WRIGHT DATED JUNE 2018

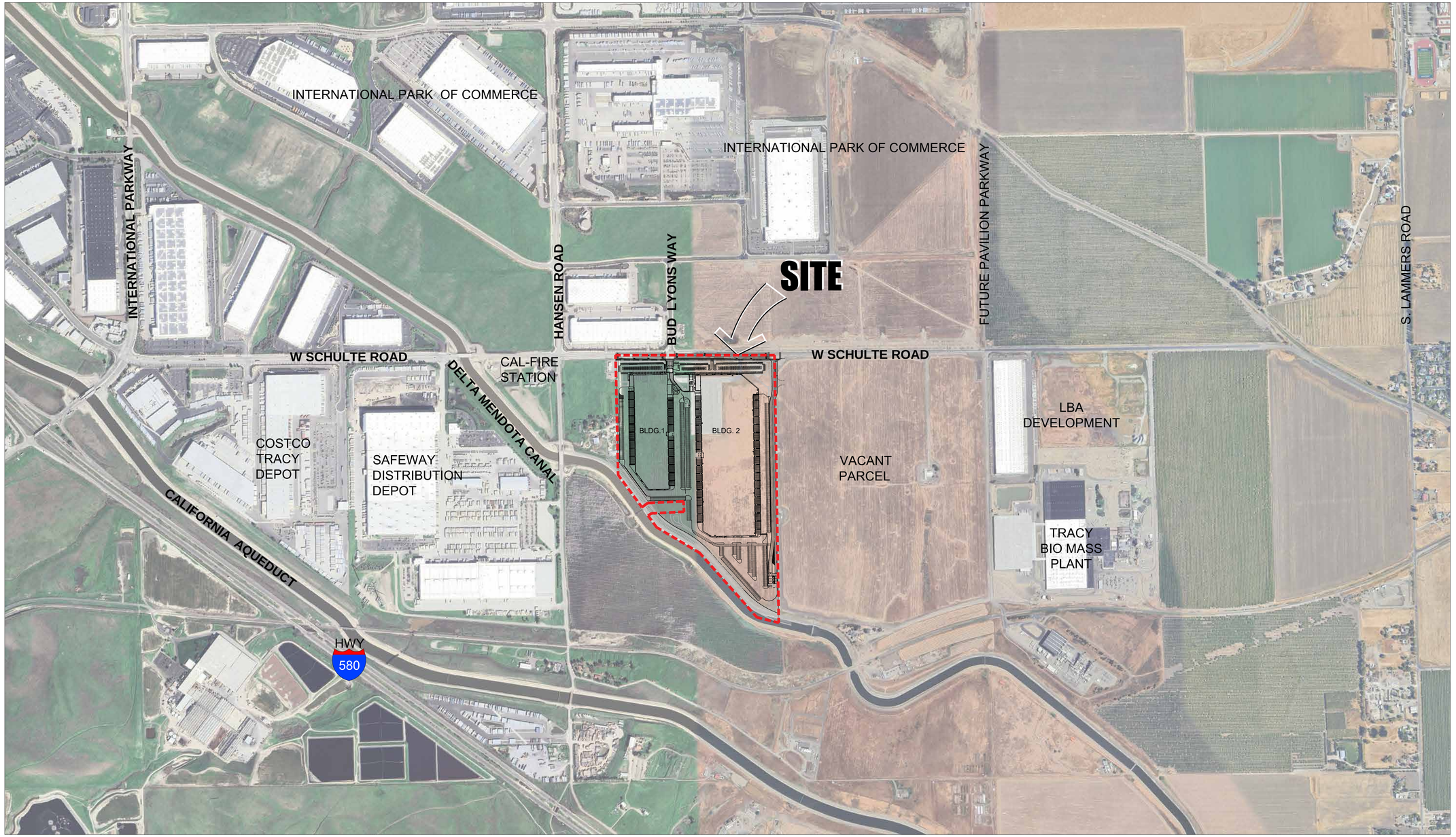
SHEET INDEX

1. TITLE SHEET
2. CONTEXT SITE PLAN
3. SITE PHOTOS
4. OVERALL SITE PLAN
5. ENLARGED SITE PLAN
6. PHASING PLAN
7. FLOOR PLAN BUILDING 1
8. FLOOR PLAN BUILDING 2
9. BUILDING 1 ELEVATIONS
10. BUILDING 2 ELEVATIONS
11. GUARDHOUSE ELEVATIONS
12. SITE SECTIONS
13. SITE SECTIONS
14. SITE SECTIONS
15. PERSPECTIVE 1
16. PERSPECTIVE 2
17. MATERIAL BOARD
18. OVERALL PRELIMINARY LANDSCAPE PLAN
19. ENLARGED PRELIMINARY LANDSCAPE PLAN
20. EMPLOYEE BREAK AREAS - PRELIMINARY LANDSCAPE PLAN
21. PRELIMINARY UNDERSTORY LANDSCAPE PLAN
22. PRELIMINARY UNDERSTORY LANDSCAPE PLAN
23. PRELIMINARY UNDERSTORY LANDSCAPE PLAN
24. PRELIMINARY UNDERSTORY LANDSCAPE PLAN
25. PRELIMINARY UNDERSTORY LANDSCAPE PLAN
26. PRELIMINARY UNDERSTORY LANDSCAPE PLAN
27. LANDSCAPE CALCULATIONS AND HARDSCAPE PLAN
28. C1.0 TOPOGRAPHIC SURVEY
29. C1.1 TOPOGRAPHIC SURVEY
30. C2.0 PRELIMINARY GRADING PLAN
31. C2.1 PRELIMINARY GRADING PLAN
32. C2.2 PRELIMINARY GRADING PLAN
33. C3.0 PRELIMINARY GRADING SECTIONS
34. C3.1 PRELIMINARY GRADING SECTIONS
35. C3.2 PRELIMINARY GRADING SECTIONS
36. C3.3 PRELIMINARY GRADING SECTIONS
37. C4.0 UTILITY PLAN
38. C4.1 UTILITY PLAN
39. C4.2 UTILITY PLAN
40. C5.0 STORMWATER MANAGEMENT PLAN
41. C5.1 STORMWATER MANAGEMENT PLAN
42. C5.2 STORMWATER MANAGEMENT PLAN
43. C5.3 STORMWATER MANAGEMENT PLAN
44. C5.4 STORMWATER MANAGEMENT PLAN

DBA #P.281

DB+A

DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD , SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070



DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

CONTEXT SITE PLAN

NOT TO SCALE

AUGUST 7, 2024

NORTH



1 VIEW OF WEST SCHULTE ROAD
AT NORTH WEST CORNER



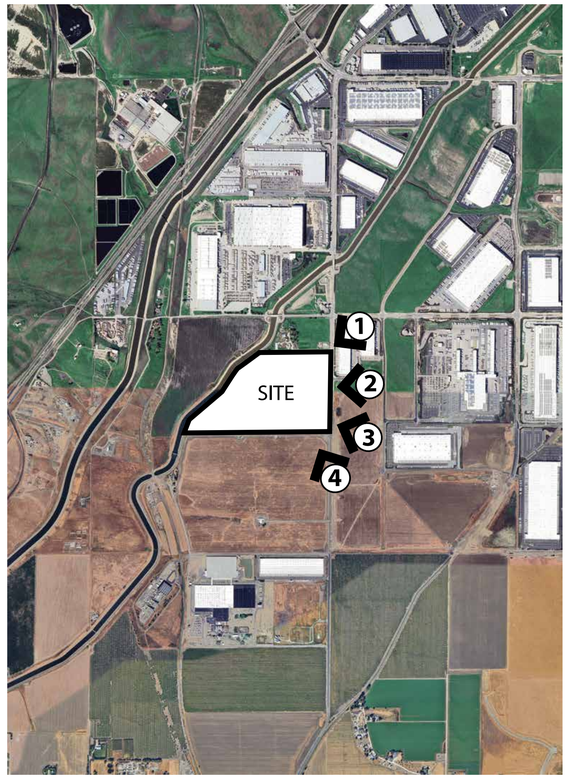
2 VIEW OF MID-SITE AT WEST SCHULTE ROAD
LOOKING SOUTH



3 VIEW OF MID-SITE AT WEST SCHULTE ROAD
LOOKING AT SOUTH



4 VIEW AT WEST SCHULTE ROAD
LOOKING AT NORTH EAST CORNER



KEY MAP

NOT TO SCALE

NORTH

DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD. , SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

SITE PHOTOS

NOT TO SCALE
AUGUST 7, 2024

Proposed Building Data

Building 1

Office Area:	11,800 sf
Warehouse Area:	530,463 sf
Total Area Building 1:	543,526 sf

Building 2

Office Area:	10,800 sf
Warehouse Area:	1,182,398 sf
Total Area Building 2:	1,193,198 sf

Total Building Area:	1,736,724 sf

Truck Route

Warehouse Delivery Truck Route

Proposed Parking Data

Building 1

Total s.f. = 543,526 s.f.

1/1000 s.f. for First 20,000 s.f. of Building Area:	20 Stalls
1/2000 s.f. for 20,000-40,000 s.f. of Building Area:	+10 Stalls
1/4000 s.f. for Remaining s.f. of Building Area. Remaining Warehouse Building Area (503,526 s.f.)	+126 Stalls
1/250 s.f. for the Office Building Area (11,800 s.f.):	+48 Stalls
Total Required Parking:	**204 Stalls**
Total Proposed Parking:	**211 Stalls**
Total Proposed Truck/Trailer Parking:	**181 Stalls**

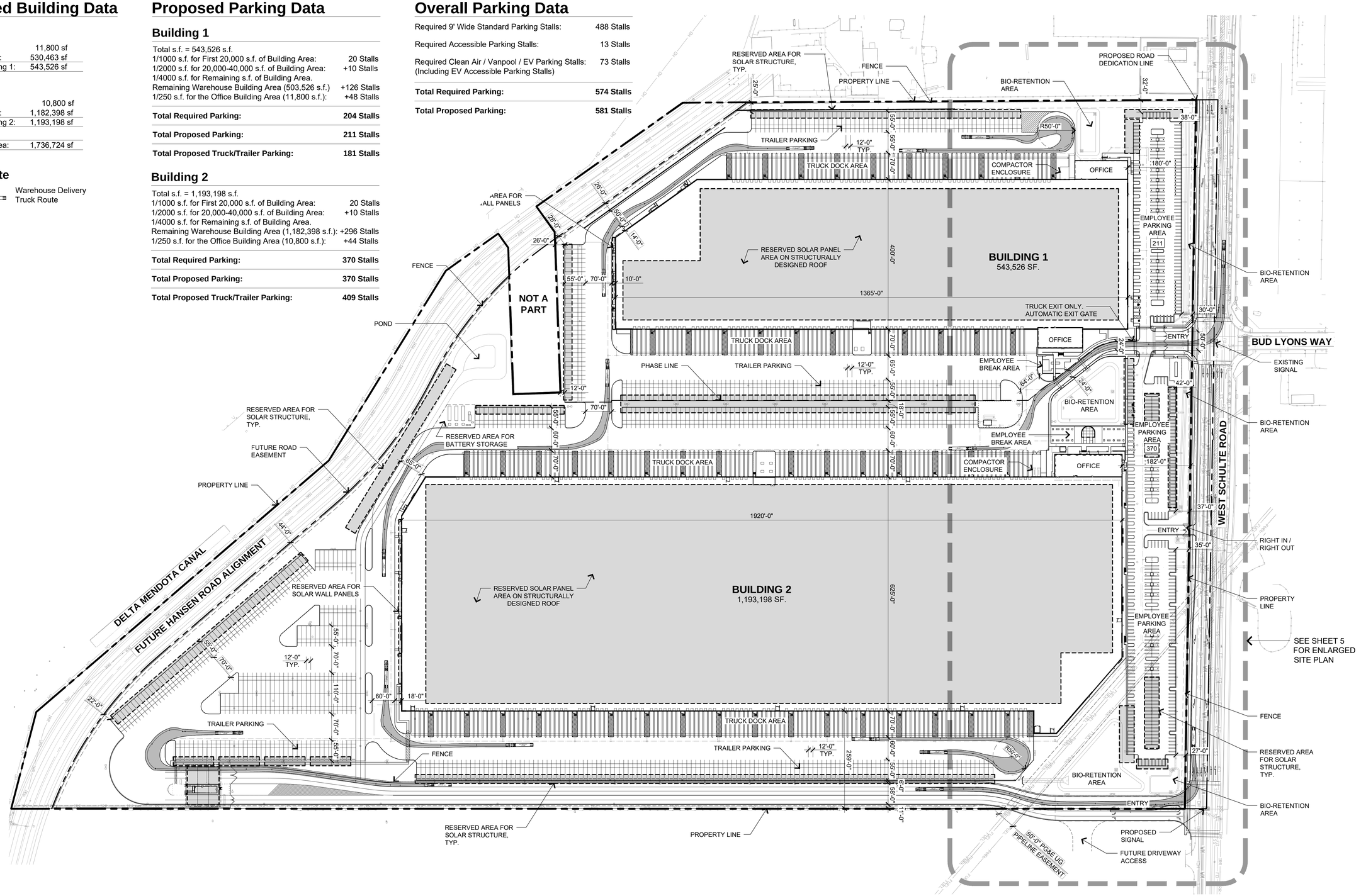
Building 2

Total s.f. = 1,193,198 s.f.

1/1000 s.f. for First 20,000 s.f. of Building Area:	20 Stalls
1/2000 s.f. for 20,000-40,000 s.f. of Building Area:	+10 Stalls
1/4000 s.f. for Remaining s.f. of Building Area. Remaining Warehouse Building Area (1,182,398 s.f.):	+296 Stalls
1/250 s.f. for the Office Building Area (10,800 s.f.):	+44 Stalls
Total Required Parking:	**370 Stalls**
Total Proposed Parking:	**370 Stalls**
Total Proposed Truck/Trailer Parking:	**409 Stalls**

Overall Parking Data

Required 9' Wide Standard Parking Stalls:	488 Stalls
Required Accessible Parking Stalls:	13 Stalls
Required Clean Air / Vanpool / EV Parking Stalls: (Including EV Accessible Parking Stalls)	73 Stalls
Total Required Parking:	**574 Stalls**
Total Proposed Parking:	**581 Stalls**



DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD , SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

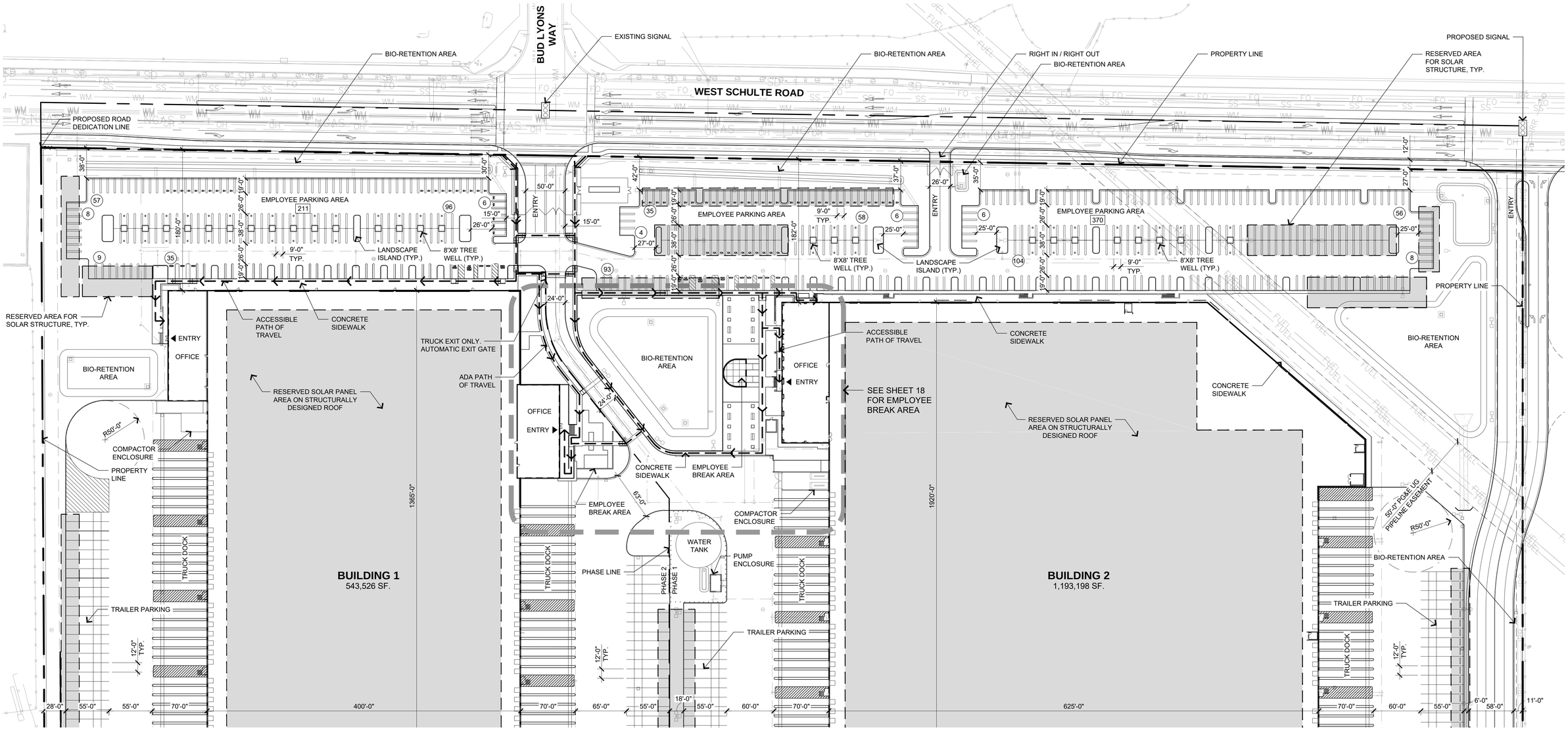
OVERALL SITE PLAN

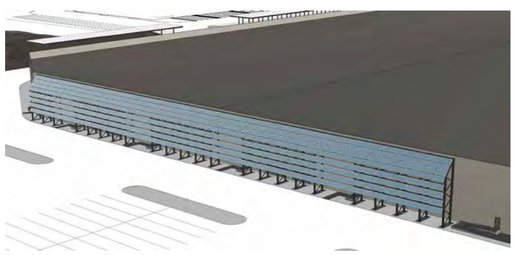
0 60' 120' 240'

SCALE 1"=120'

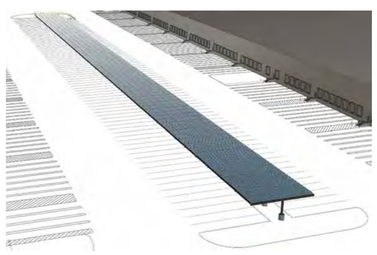
AUGUST 7, 2024

NORTH





SOLAR WALL PANELS



SOLAR STRUCTURE

DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD. , SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

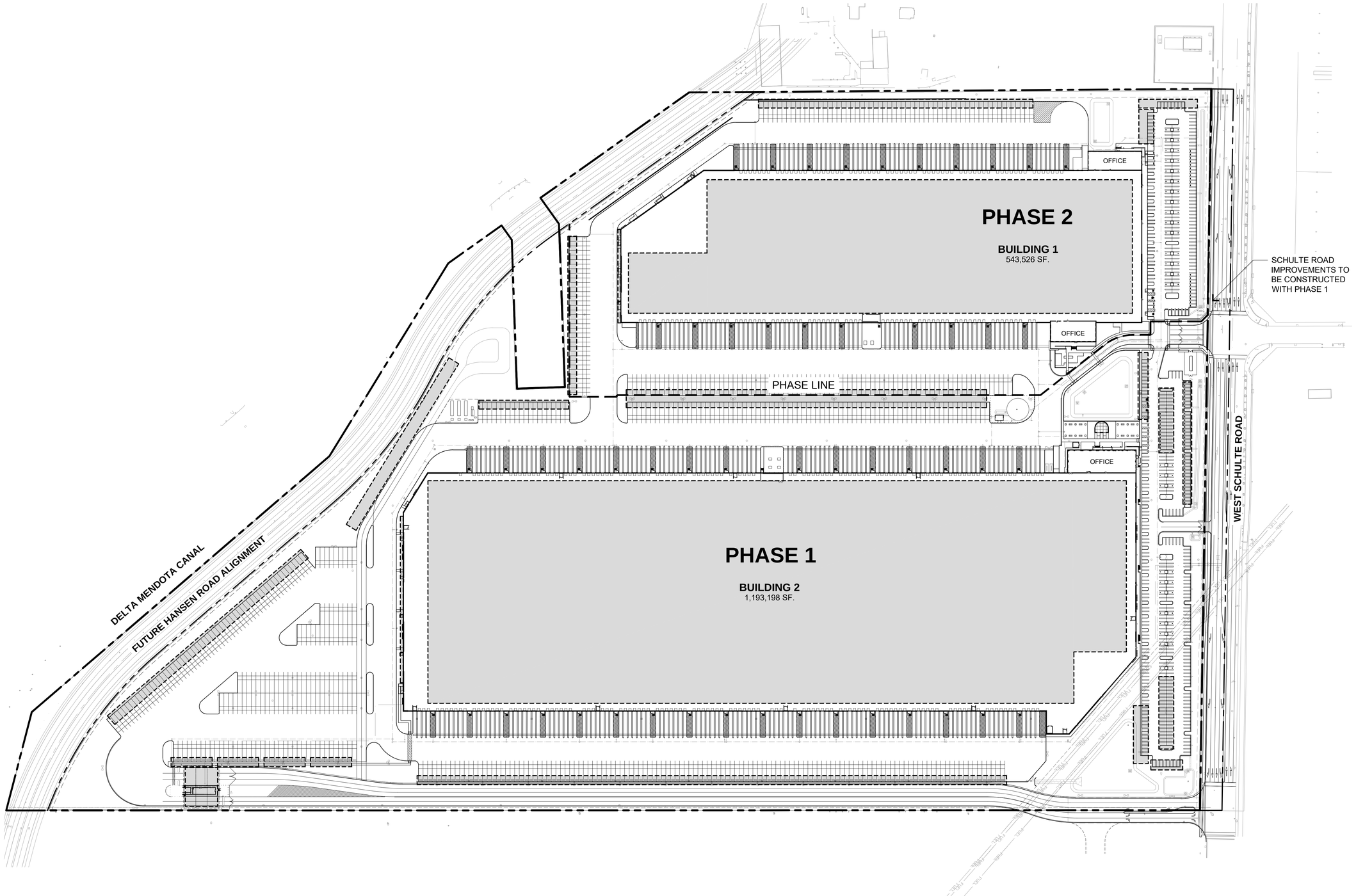
ENLARGED SITE PLAN

0 30' 60' 120'

SCALE 1"=60'

AUGUST 7, 2024

NORTH



COSTCO FACILITIES

PHASING PLAN

0 60' 120' 240'

SCALE 1"=120'

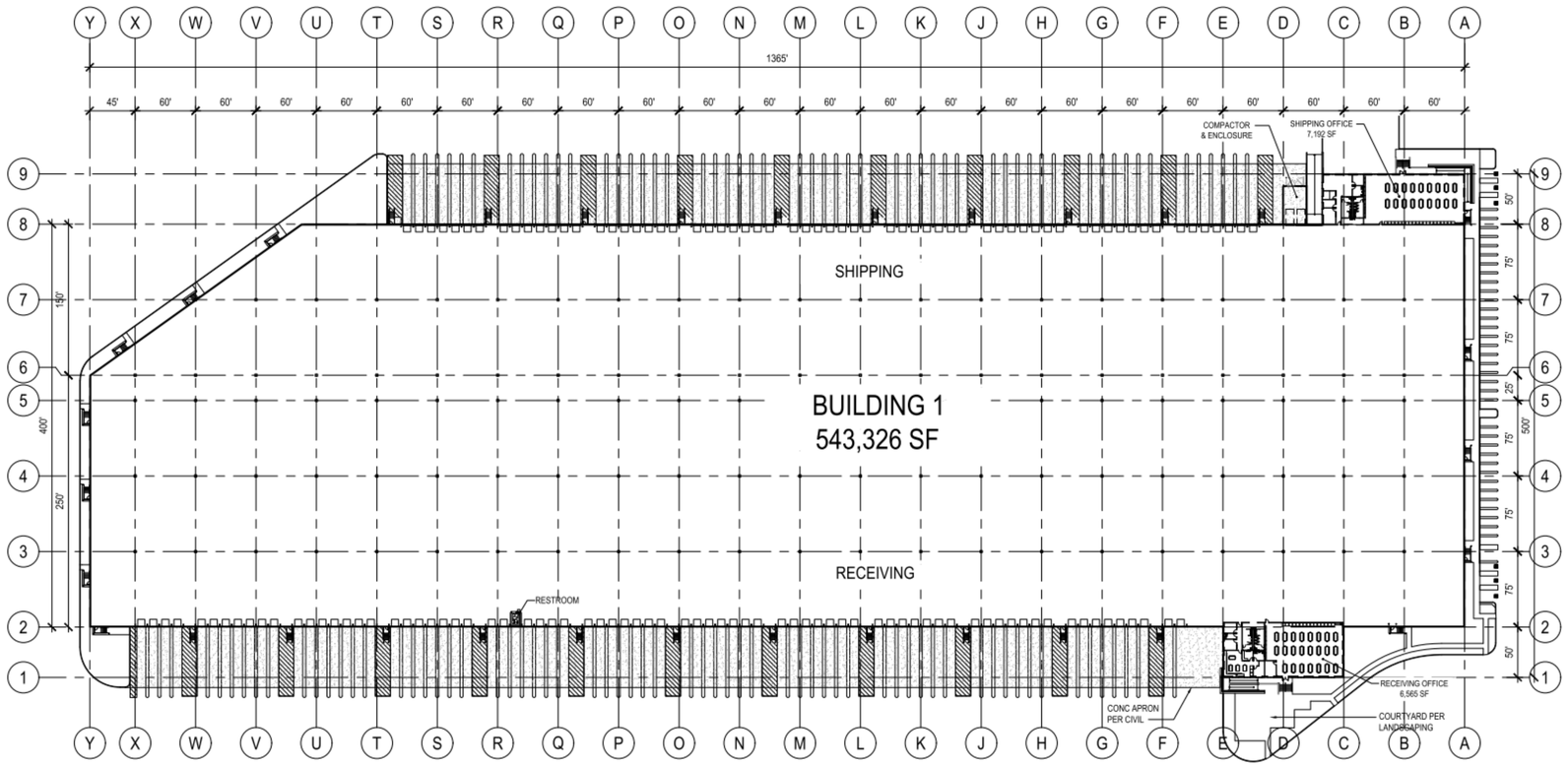
AUGUST 7, 2024

NORTH

SHEET 6 of 44

DBA #P.281

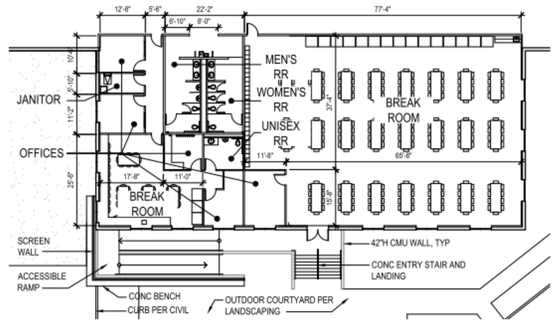
DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD , SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070



1 OVERALL FLOOR PLAN

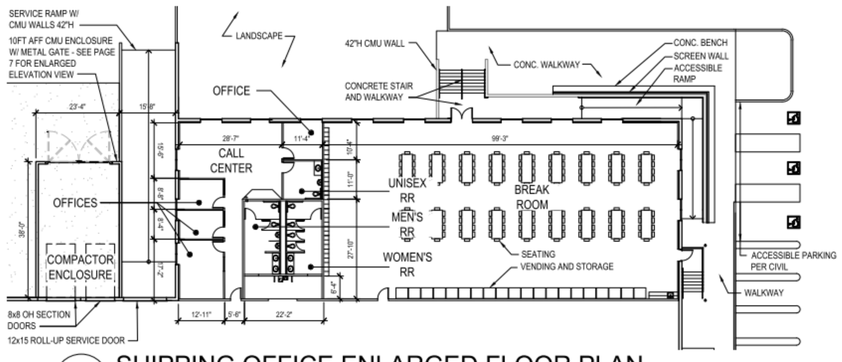
SCALE: 1" = 70'

CONSTRUCTION TYPE: VB
OCCUPANCY CLASS: S1/B



2 RECEIVING OFFICE ENLARGED FLOOR PLAN

SCALE: 1" = 20'



3 SHIPPING OFFICE ENLARGED FLOOR PLAN

SCALE: 1" = 20'

NORTH

COSTCO WHOLESALE

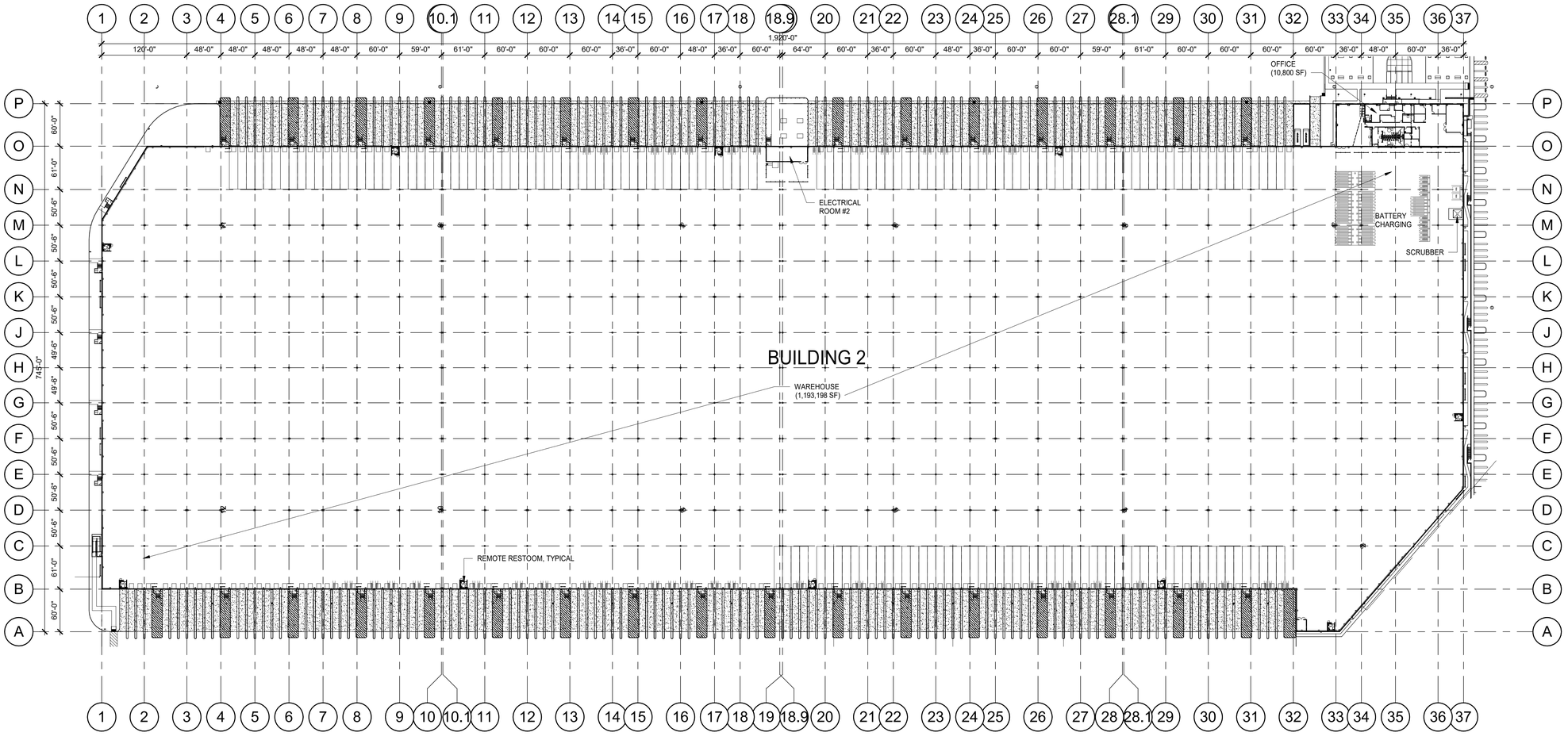
FLOOR PLAN - BUILDING 1

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

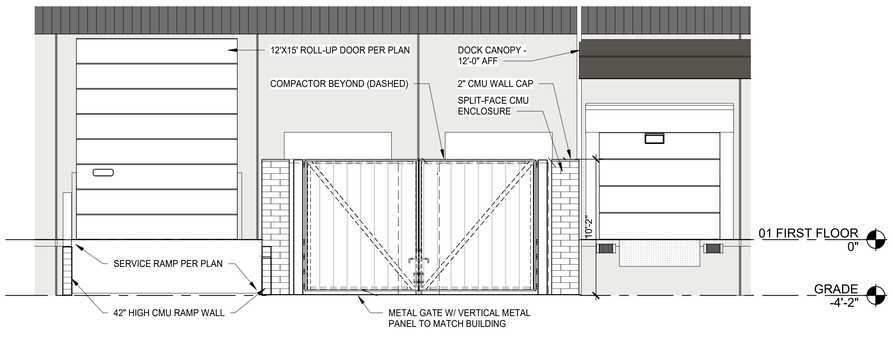
SNR22-5021-00
11/30/22

SHEET
7



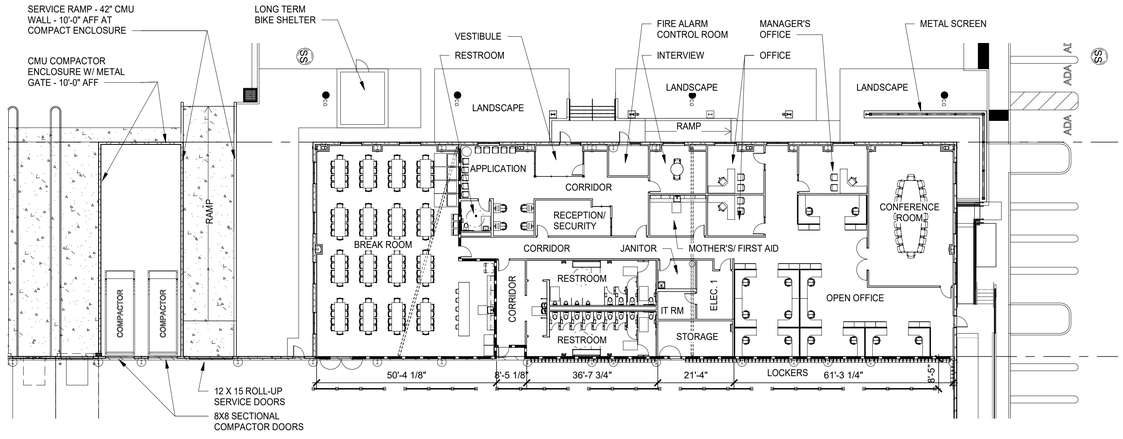
OVERALL FLOOR PLAN 1

SCALE: 1" = 80'-0"



ENLARGED COMPACTOR ELEVATION 3

SCALE: 3/16" = 1'-0"



ENLARGED FLOOR PLAN 2

SCALE: 1" = 20'-0"

NORTH

COSTCO WHOLESALE

FLOOR PLAN - BUILDING 2

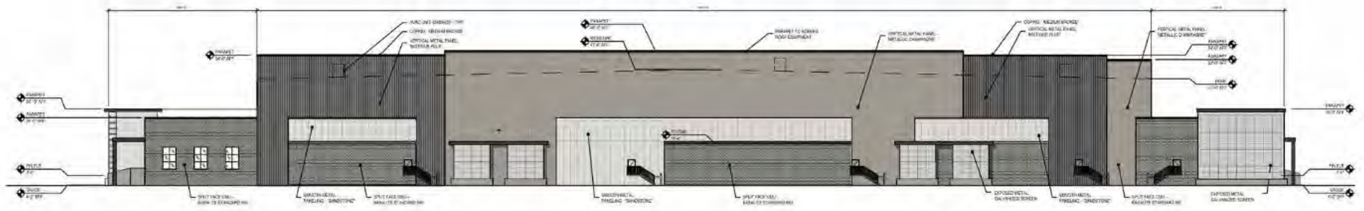
COSTCO WHOLESALE DDC (TRACY HOM)

16000 W Schulte Rd.
Tracy, CA 95377

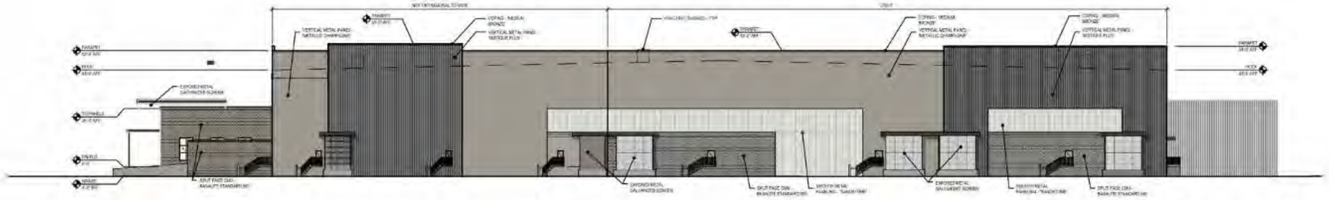
WARE MALCOMB

SNR22-5021-00
11/30/22

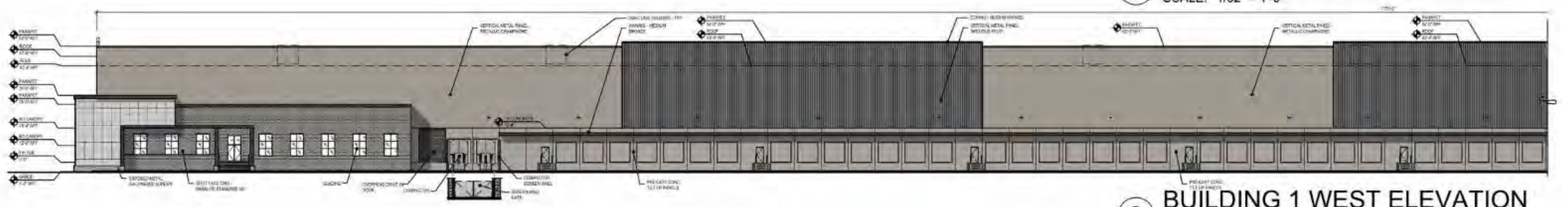
SHEET
8



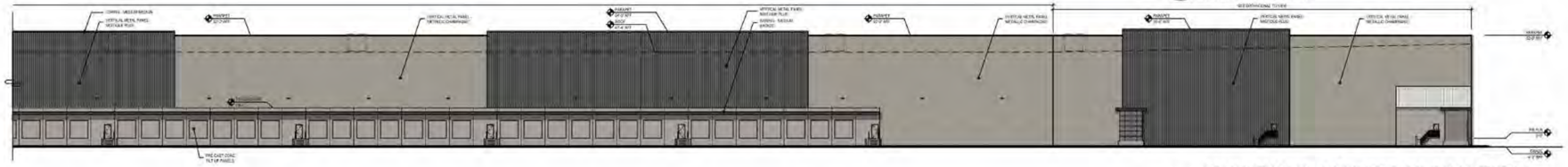
1 BUILDING 1 NORTH ELEVATION
SCALE: 1/32" = 1'-0"



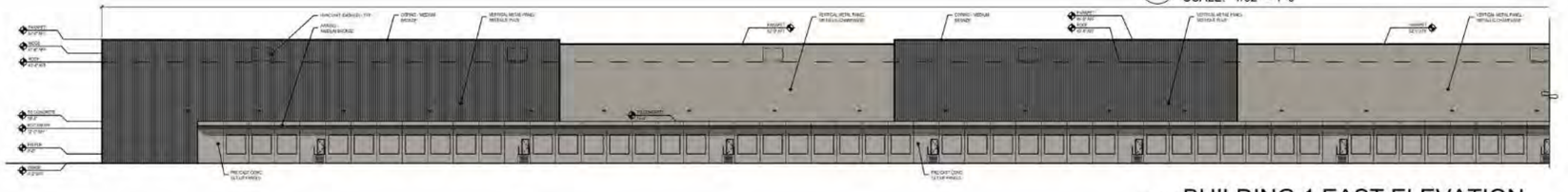
2 BUILDING 1 SOUTH ELEVATION
SCALE: 1/32" = 1'-0"



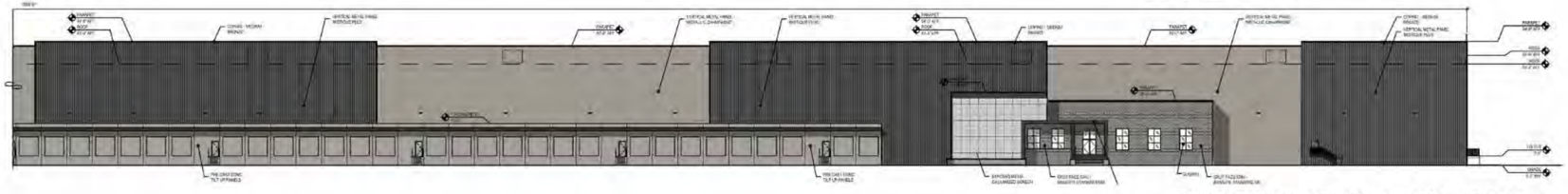
3 BUILDING 1 WEST ELEVATION
SCALE: 1/32" = 1'-0"



4 BUILDING 1 WEST ELEVATION
SCALE: 1/32" = 1'-0"



5 BUILDING 1 EAST ELEVATION
SCALE: 1/32" = 1'-0"



6 BUILDING 1 EAST ELEVATION
SCALE: 1/32" = 1'-0"

COSTCO WHOLESALE

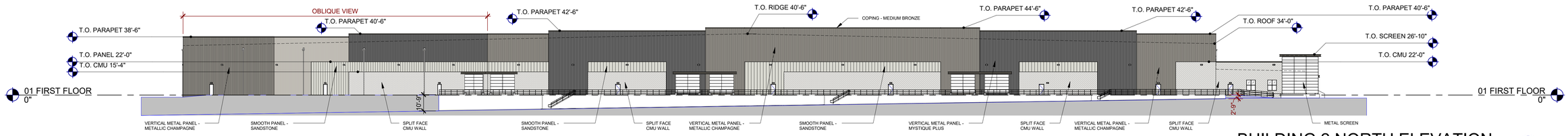
BUILDING 1 ELEVATIONS

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

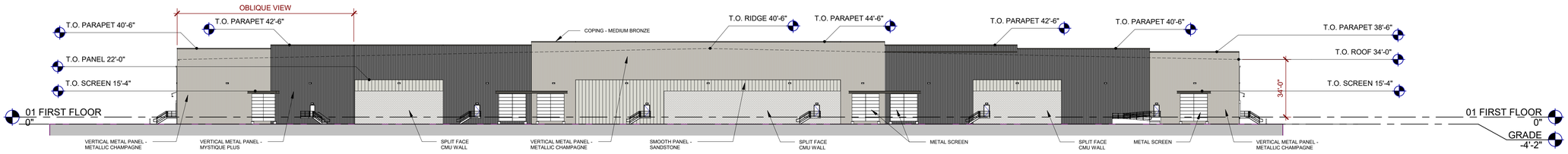
SNR22-5021-00
11/30/22

SHEET
9



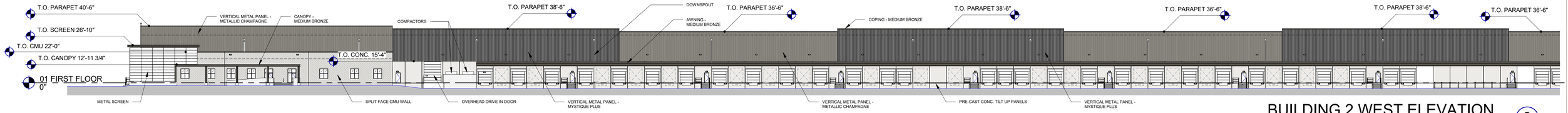
BUILDING 2 NORTH ELEVATION

SCALE: 1/32" = 1'-0" — 1



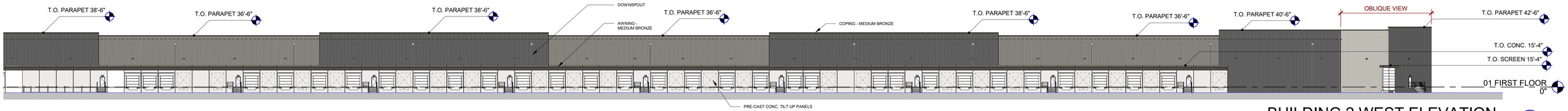
OVERALL SOUTH EXTERIOR ELEVATION

SCALE: 1/32" = 1'-0" — 2



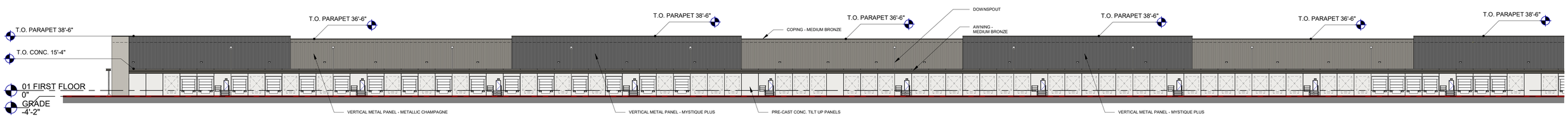
BUILDING 2 WEST ELEVATION

SCALE: 1/32" = 1'-0" — 3



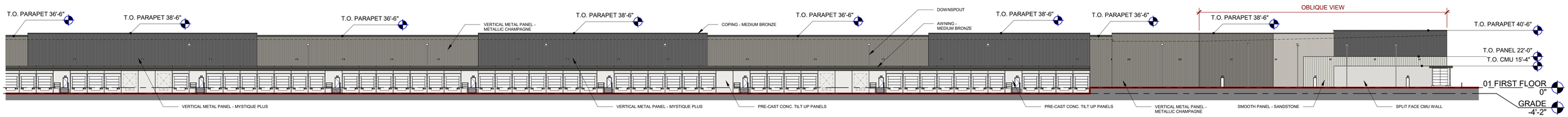
BUILDING 2 WEST ELEVATION

SCALE: 1/32" = 1'-0" — 4



BUILDING 2 EAST ELEVATION

SCALE: 1/32" = 1'-0" — 5



BUILDING 2 EAST ELEVATION

SCALE: 1/32" = 1'-0" — 6

COSTCO WHOLESALE

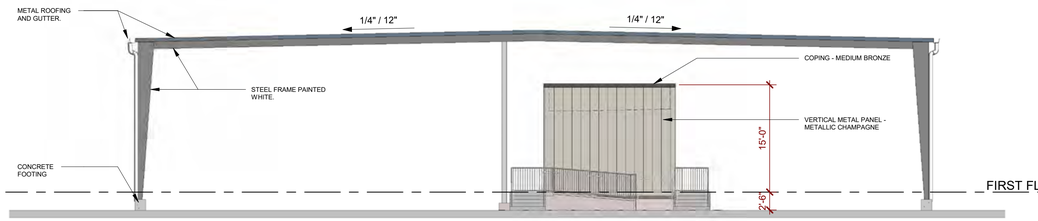
BUILDING 2 ELEVATIONS

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

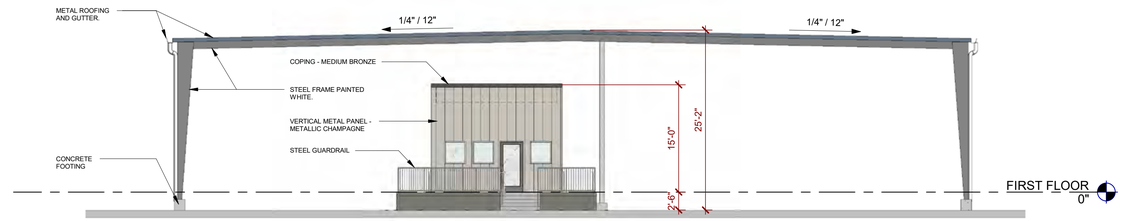
SNR22-5021-00
11/30/22

SHEET
10



South Elevation 3

SCALE: 1" = 10'-0"



North Elevation 1

SCALE: 1" = 10'-0"



West Elevation 4

SCALE: 1" = 10'-0"



East Elevation 2

SCALE: 1" = 10'-0"

COSTCO WHOLESALE

GUARDHOUSE ELEVATIONS

COSTCO WHOLESALE DDC (TRACY HOM)

16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

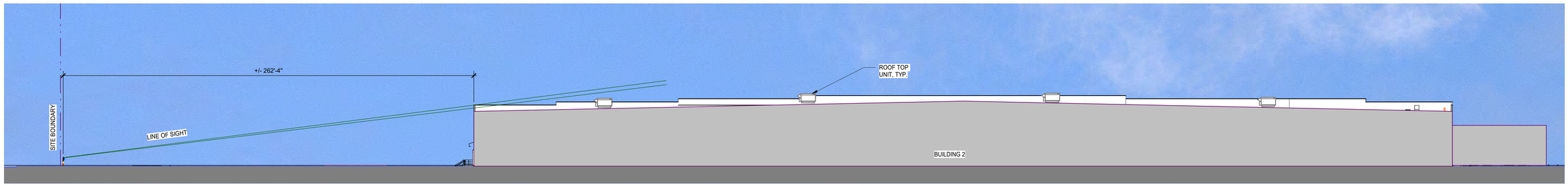
SNR22-5021-00
11/30/22

SHEET
11



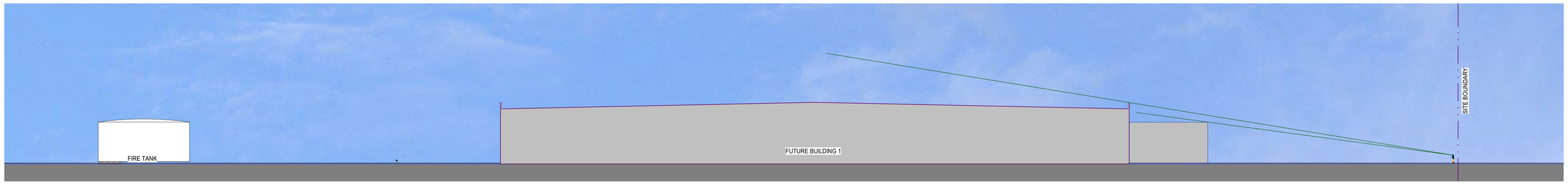
OVERALL SITE STUDY NORTH SECTION — A

SCALE: 1" = 80'-0"



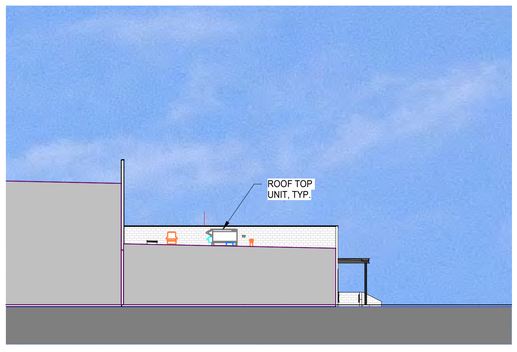
BUILDING 2 SITE STUDY NORTH SECTION — A1

SCALE: 1" = 30'-0"



FUTURE BUILDING 1 ENLARGED SITE STUDY NORTH SECTION — A2

SCALE: 1" = 30'-0"



BUILDING 2 SECTION @ OFFICE — A3

SCALE: 1" = 20'-0"



SIGHT LINE SECTION LABELS

COSTCO WHOLESALE

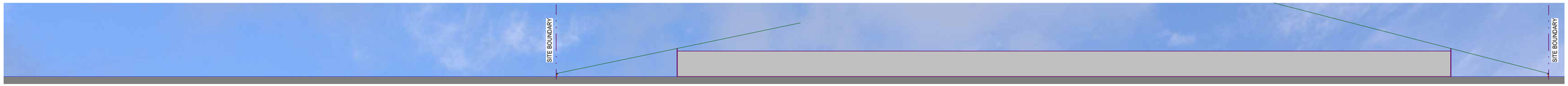
SITE SECTIONS

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

SNR22-5021-00
11/30/22

SHEET
12



FUTURE BUILDING 1 OVERALL SITE STUDY WEST SECTION

SCALE: 1" = 80'-0"

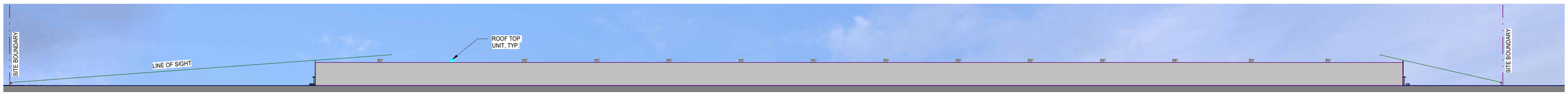
B



FUTURE BUILDING 1 SITE STUDY WEST SECTION

SCALE: 1" = 30'-0"

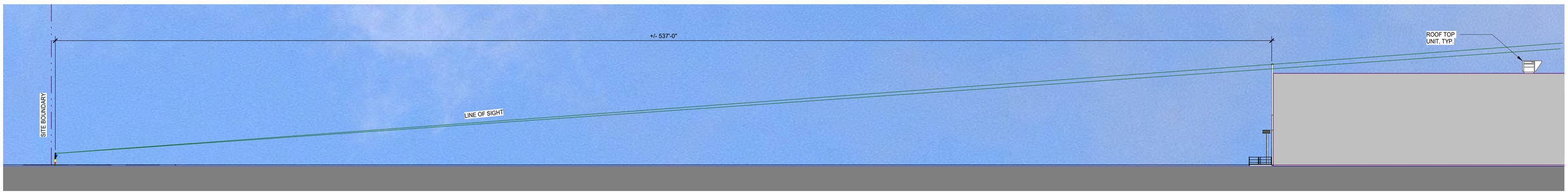
B1



OVERALL BUILDING 2 SITE STUDY EAST SECTION

SCALE: 1" = 80'-0"

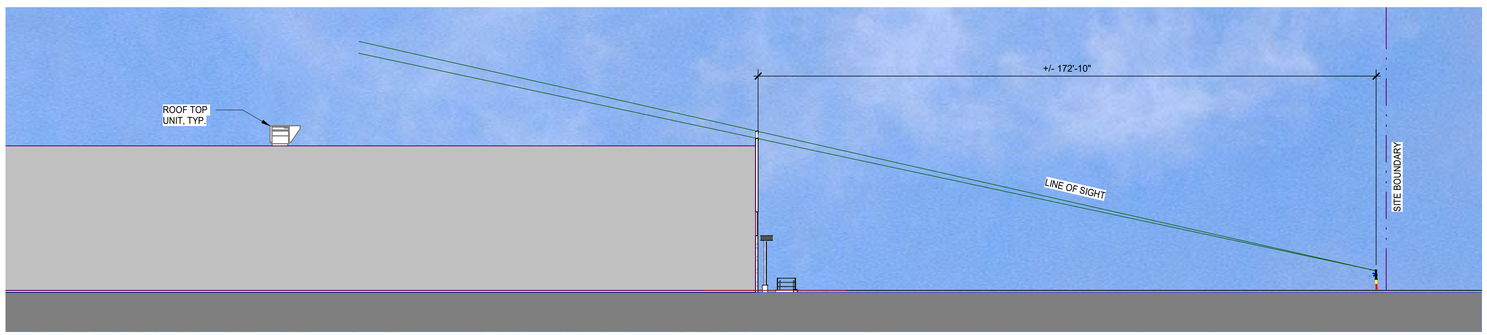
C



BUILDING 2 SITE STUDY EAST SECTION

SCALE: 1" = 20'-0"

C1



BUILDING 2 SITE STUDY EAST SECTION

SCALE: 1" = 20'-0"

C2



SIGHT LINE SECTION LABELS

COSTCO WHOLESALE

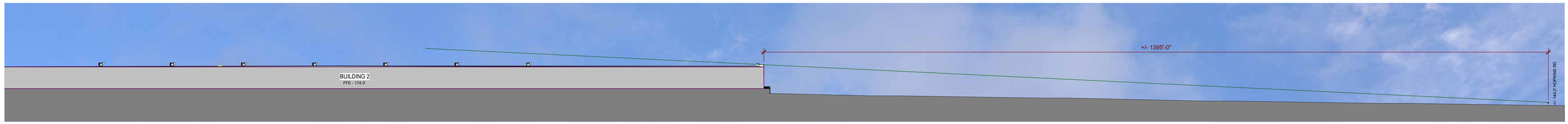
SITE SECTIONS

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

SNR22-5021-00
11/30/22

SHEET
13



OVERALL SITE STUDY FROM HOPKINS RD

D

SCALE: 1" = 80'-0"



OVERALL SITE STUDY FROM INTERSECTION OF SCHULTE RD AND HANSEN RD

E

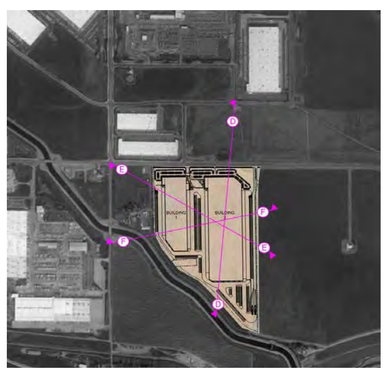
SCALE: 1" = 80'-0"



OVERALL SITE STUDY SOUTHWEST TO NORTHEAST SECTION

F

SCALE: 1" = 80'-0"



COSTCO WHOLESALE

SITE SECTIONS

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

SNR22-5021-00
11/30/22

SHEET
14



PERSPECTIVE 1

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

SNR22-5021-00
11/30/22

SHEET
15



BUILDING 2

PERSPECTIVE 2

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

SNR22-5021-00
11/30/22

SHEET
16





A **ARCHITECTURAL METAL PANEL**
METALLIC CHAMPAGNE



B **ARCHITECTURAL METAL PANEL**
MISTIQUE PLUS



C **CMU**
BASALITE - STANDARD 580



D **CANOPY AND COPING ACCENT**
MEDIUM BRONZE



E **PERFORATED SCREENING**
METAL

F **SMOOTH METAL PANEL**
SANDSTONE

COSTCO WHOLESALE

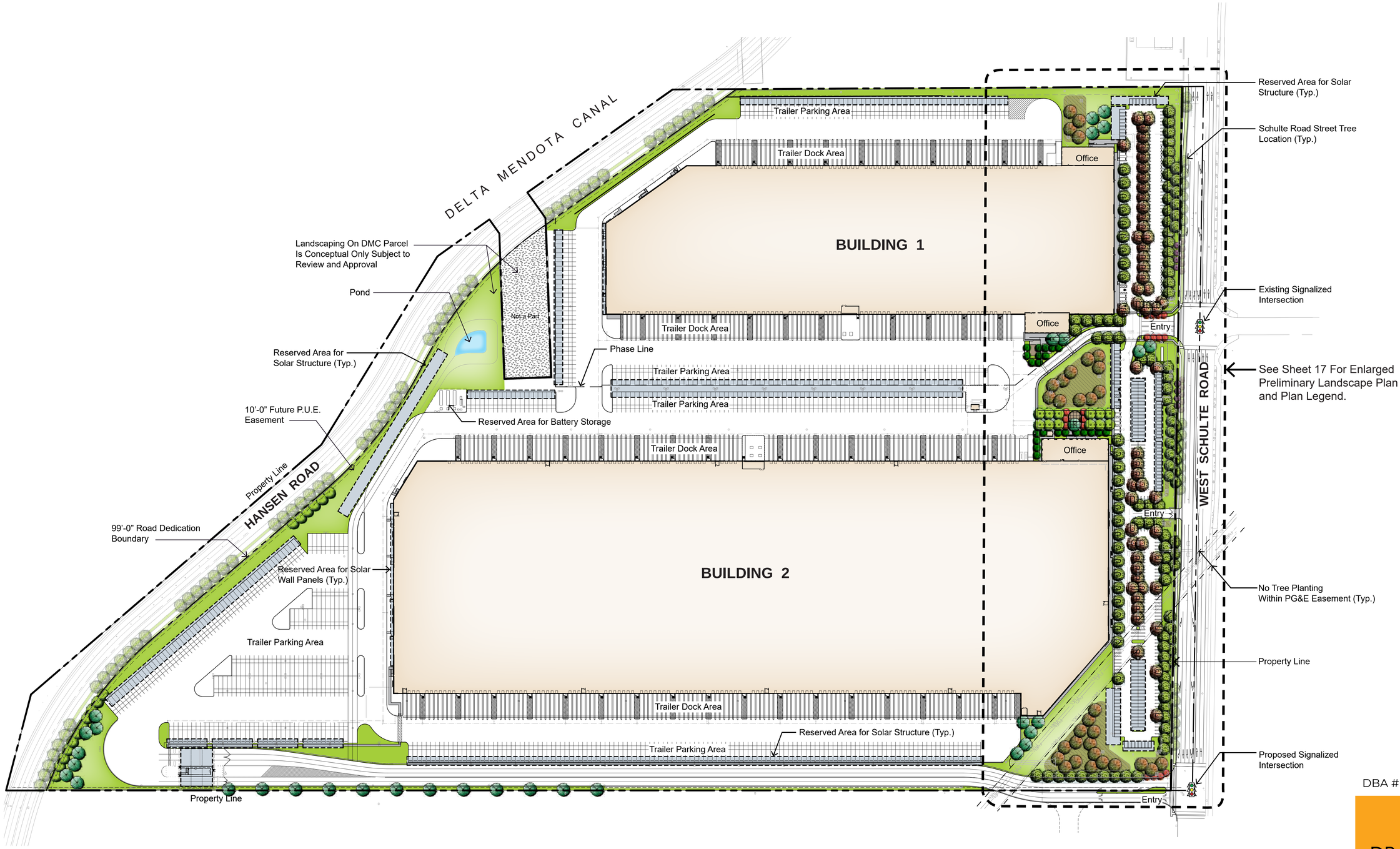
MATERIAL BOARD

COSTCO WHOLESALE DDC (TRACY HOM)
16000 W Schulte Rd.
Tracy, CA 95377

WARE MALCOMB

SNR22-5021-00
11/30/22

SHEET
17



DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

OVERALL PRELIMINARY LANDSCAPE PLAN

0 60' 120' 240'

SCALE 1"=120'

AUGUST 7, 2024

NORTH



PLANT LEGEND

	BOTANICAL / COMMON NAME	SIZE	SPACING	WUCOLS (Water Use Classification of Landscape Species)	TREE SIZE CANOPY (Diameter in Feet) at Maturity	QTY.	COMMENTS
	Trees						
	Lagerstroemia hyb. 'Dynamite'/ Dynamite Crape Myrtle	24" Box	16' – 0" o.c.	L	16'	8	Matched Standards
	Lagerstroemia hyb. 'Tuscarora' / Pink/Red Flowering Crape Myrtle	24" Box	16' – 0" o.c.	L	16'	18	Matched Standards
	Quercus ilex / Holly Oak	24" Box	80' – 0" o.c. or as shown.	L	35'	33	Matched Standards
	Quercus macrocarpa / Urban Pinnacle Oak	24" Box	As shown	M	25'	22	Matched Standards
	Quercus shumardii / Shumard Red oak	24" Box	As shown	M	35'	54	Matched Standards
	Quercus v. 'Sky Climber' / Sky Climber Southern Oak	24" Box	As shown	L	35'	32	Matched Standards
	Ulmus parvifolia 'True Green' / True Green Chinese Evergreen Elm	24" Box	30' – 0" o.c. or as shown.	M	30'	119	Matched Standards
	Ulmus 'Frontier' / Frontier Elm	24" Box	As shown	M	25'	29	Matched Standards
					TOTAL NUMBER OF TREES :	**315**	
	Street Trees at Schulte Road						
	Lagerstroemia hyb. 'Dynamite'/ Dynamite Crape Myrtle	24" Box		M	16'	10	Matched Standards
	Ulmus parvifolia 'True Green' / True Green Chinese Evergreen Elm	24" Box		M	30'	22	Matched Standards
	Street Trees at Hansen Road						
	Ulmus parvifolia True Green Chinese Evergreen Elm	24" Box		M	16'	56	Matched Standards
					TOTAL NUMBER OF STREET TREES :	**88**	

BOTANICAL / COMMON NAME	SIZE	SPACING	WUCOLS (Water Use Classification of Landscape Species)	COMMENTS
Understory Planting				
Screen Shrubs				
Arbutus unedo 'Compacta' / Compact Strawberry Tree	15 gal.	10' – 0" o.c.	L	
Arctostaphylos 'Howard McMinn' / Howard McMinn Arctostaphylos	5 gal.	8' – 0" o.c.	L	
Dodonaea viscosa / Hop Bush	5 gal.	8' – 0" o.c.	L	Low-branching
Elaeagnus Dungens / Silverberry	5 gal.	12' – 0" o.c.	L	Multi-trunked
Heteromeles arbutifolia / Toyon	15 gal.	12' – 0" o.c.	L	
Myrica californica / Pacific Wax Myrtle	15 gal.	12' – 0" o.c.	M	Low-branching
Thuja o. 'Emerald' / Emerald Arborvitae	15 gal.	3' – 6" o.c.	M	Matched in size
Shrubs and Perennials				
Dietes vegata 'Variegata' / Variegated Fortnight Lily	5 gal.	3' – 0" o.c.	L	
Grevillea 'Scarlet Sprite' / Scarlet Sprite Grevillea	5 gal.	4' – 0" o.c.	L	
Lomandra longifolia 'Breeze' / Breeze Lomandra	1 gal.	4' – 0" o.c.	L	
Nerium Oleander 'Petite Red' Petite Red Oleander	5 gal.	6' – 0" o.c.	L	
Rhaphiolepis Indica 'Pink Dancer' / Pink Dance Indian Hawthorn	5 gal.	3' – 6" o.c.	M	
Salvia l. 'Santa Barbara' / Santa Barbara Sage	5 gal.	4' – 0" o.c.	L	
Westringia fruticosa 'Blue Gem' / Blue Gem Coast Rosemary	5 gal.	4' – 0" o.c.	L	

BOTANICAL / COMMON NAME	SIZE	SPACING	WUCOLS (Water Use Classification of Landscape Species)	COMMENTS
Ornamental Grasses				
Festuca mairei / Atlas Fescue	1 gal.	2' – 6" o.c.	M	
Muhlenbergia rigens / Deer Grass	1 gal.	5' – 0" o.c.	L	
Pennisetum orientale / Oriental Fountain Grass	1 gal.	2' – 0" o.c.	M	
Ground Covers				
Cotoneaster dammeri 'Lowfast' / Lowfast Bearberry	1 gal.	8' – 0" o.c.	L	
Juniperus horizontalis 'Blue Chip' / Blue Chip Juniper	1 gal.	6' – 0" o.c.	L	
Lantana hyb. 'Dwarf Yellow' / Dwarf Yellow Lantana	1 gal.	4' – 6" o.c.	L	
Myoporum parvifolium 'Pink' / Pink Myoporum	1 gal.	8' – 0" o.c.	L	
Rosmarinus o. 'Huntington Blue' / Huntington Blue Rosemary	1 gal.	5' – 0" o.c.	L	

BOTANICAL / COMMON NAME	SIZE	SPACING	WUCOLS (Water Use Classification of Landscape Species)	COMMENTS
Bio-Retention Area Planting				
Chondropetalum tectorum / Small Cape Rush	1 gal.	3' – 6" o.c.	M	
Festuca mairei / Atlas Fescue	1 gal.	2' – 6" o.c.	L	
Juncus patens 'Elk Blue' / Elk Blue California Gray Rush	1 gal.	2' – 0" o.c.	M	
Muhlenbergia rigens / Deer Grass	1 gal.	5' – 0" o.c.	L	
Rosa californica / California Wild Rose	5 gal.	8' – 0" o.c.	L	

Irrigation System Statement

The irrigation system will be a water efficient low flow, point source system designed to provide adequate watering to support plant growth and ensure deeply rooted plant material while avoiding excess water application. The system will be programmable, allowing operation during late night and/or early morning hours, with multiple start times and cycles. The system will interface with a weather based sensor that will adjust the amount of water applied to the plant material based on daily weather conditions. Irrigation materials specified for the site will bn the basis of durability and ease of maintenance. Landscape irrigation will comply with the California Department of Water Resources model Water Efficient Landscape Ordinance (MWELO).

WUCOLS LEGEND:

(WATER USAGE CLASSIFICATION OF LANDSCAPE SPECIES)

L Low Water Use

M Moderate Water Use

LANDSCAPE DATA:

Parking Lot Trees

Total number of Trees Required: 119 Trees
(1 Tree / 5 Parking stalls)

Total number of Trees Provided: 133 Trees
(At perimeter parking and within parking lot planters, typ.)

Tree Shade Calculation

Shade Required: 50%
Shade Provided: 55%

DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

ENLARGED PRELIMINARY LANDSCAPE PLAN

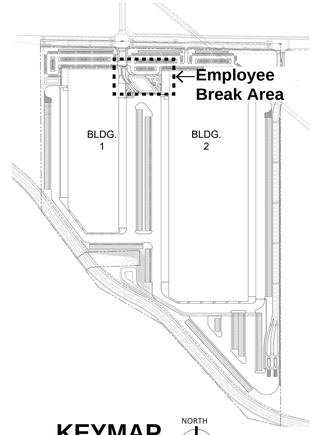
0 30' 60' 120'

SCALE 1"=60'

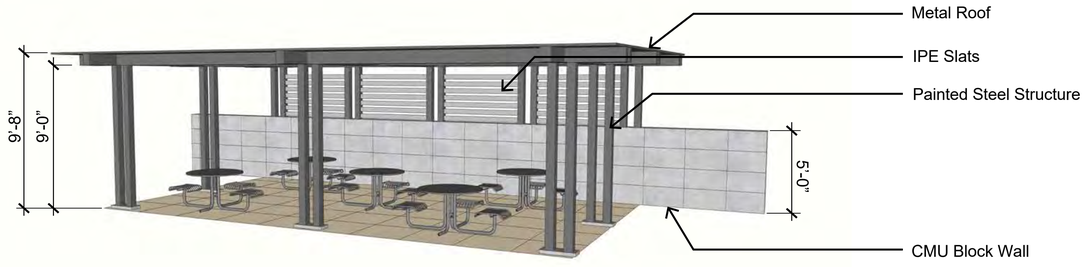
AUGUST 7, 2024

NORTH





KEYMAP NORTH



Shade Structure Perspective

NOTE:
SEE SHEET 17
FOR PLANT LEGEND

SEE SHEET 25
FOR HARDSCAPE
MATERIALS

DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

EMPLOYEE BREAK AREA - PRELIMINARY LANDSCAPE PLAN

0 10' 20' 40'
SCALE 1"=20'
AUGUST 7, 2024

NORTH

MATCHLINE 'L' - SEE SHEET 24

Solar Structure (Typ.)

Bio-Retention Area

Phase Line

MATCHLINE 'A'

Building 1

MATCHLINE 'A'

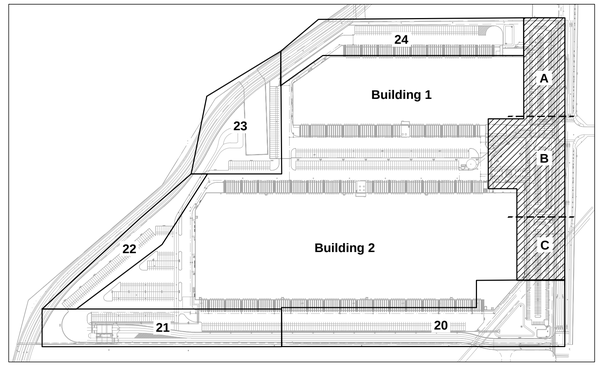
Bio-Retention Area

Bio-Retention Area

Building 2

Reserved Area For Solar Structure (Typ.)

MATCHLINE 'B'



KEY PLAN
N.T.S

MATCHLINE 'B'

Bio-Retention Area

Solar Structure (Typ.)

No Tree Planting Within PG&E Easement (Typ.)

MATCHLINE 'C' - SEE SHEET 20

Plan A

Plan B

Plan C

DBA #P.281

DB+A

DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

PRELIMINARY UNDERSTORY LANDSCAPE PLAN

0 15' 30' 60'

SCALE 1"=30'

AUGUST 7, 2024

NORTH

MATCHLINE 'C' - SEE SHEET 19

Building 2

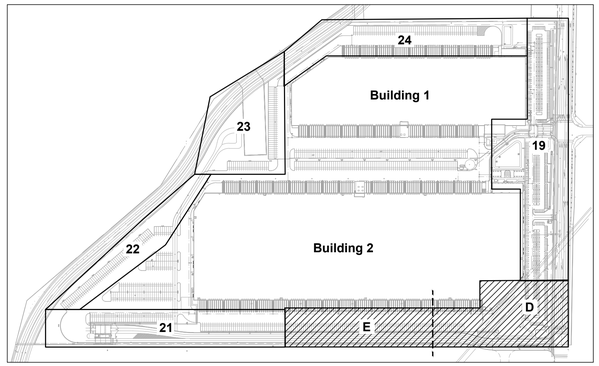
Reserved Area For Solar Structure (Typ.)

Bio-Retention Area

No Tree Planting Within PG&E Easement (Typ.)

MATCHLINE 'D'

Plan D



KEY PLAN
N.T.S

NORTH

Reserved Area For Solar Structure (Typ.)

MATCHLINE 'E' - SEE SHEET 21

MATCHLINE 'D'

Plan E

DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

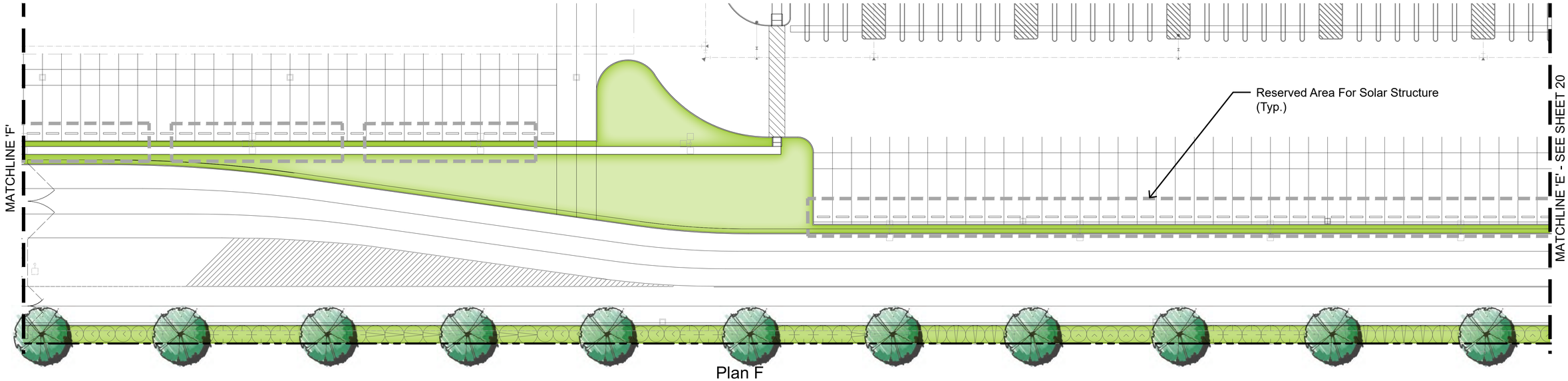
PRELIMINARY UNDERSTORY LANDSCAPE PLAN

0 15' 30' 60'

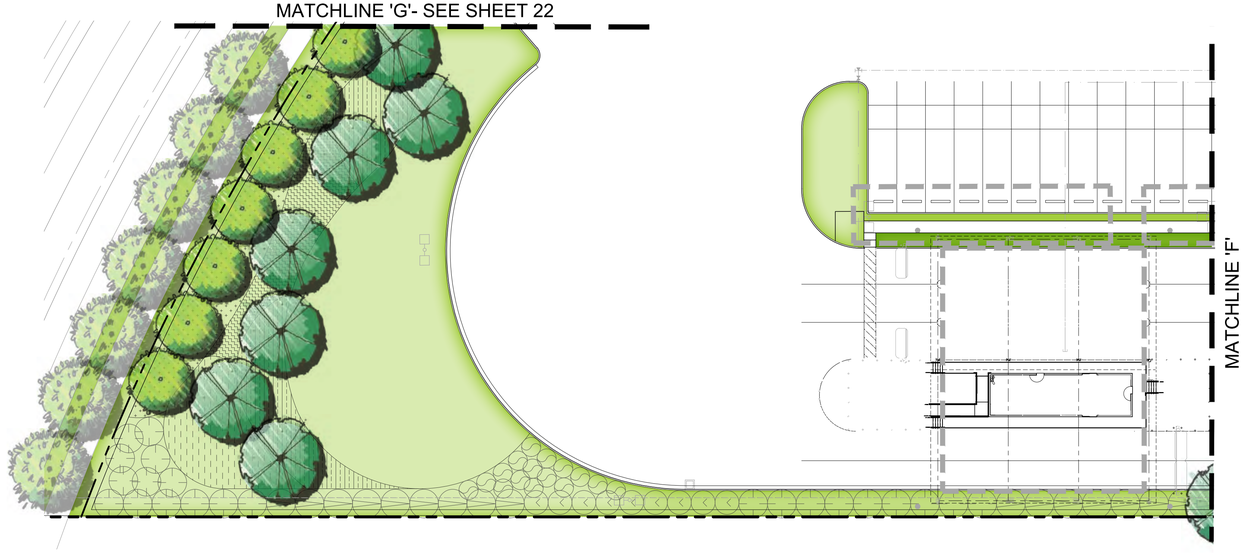
SCALE 1"=30'

AUGUST 7, 2024

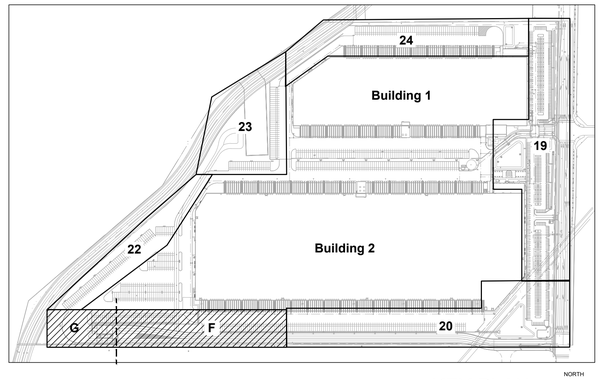
NORTH



Plan F



Plan G



KEY PLAN
N.T.S

NORTH

DBA #P.281

DB+A

DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

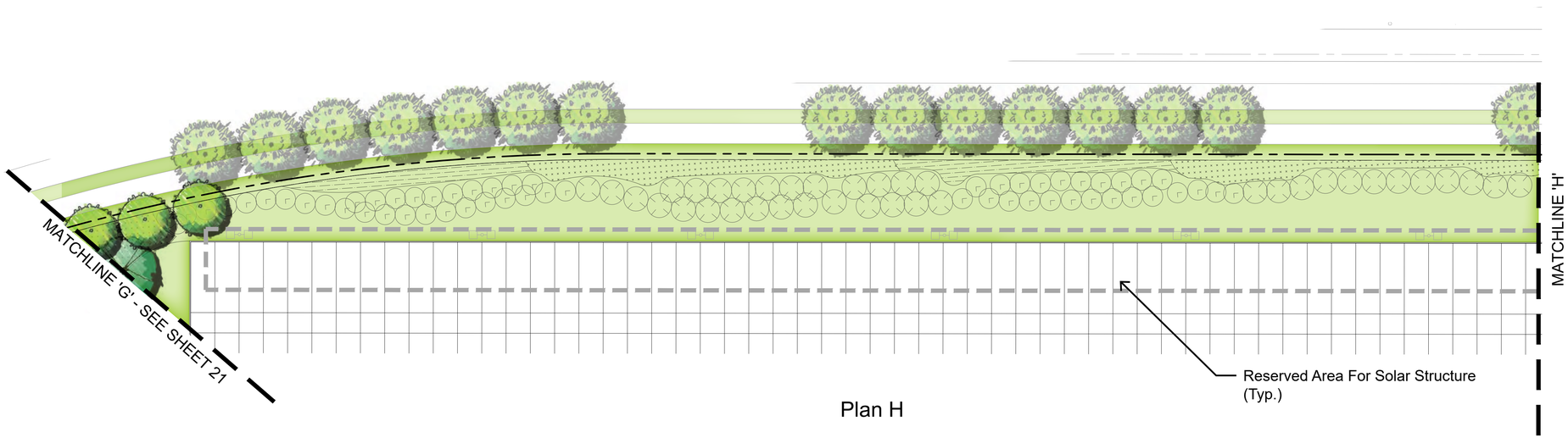
PRELIMINARY UNDERSTORY LANDSCAPE PLAN

0 15' 30' 60'

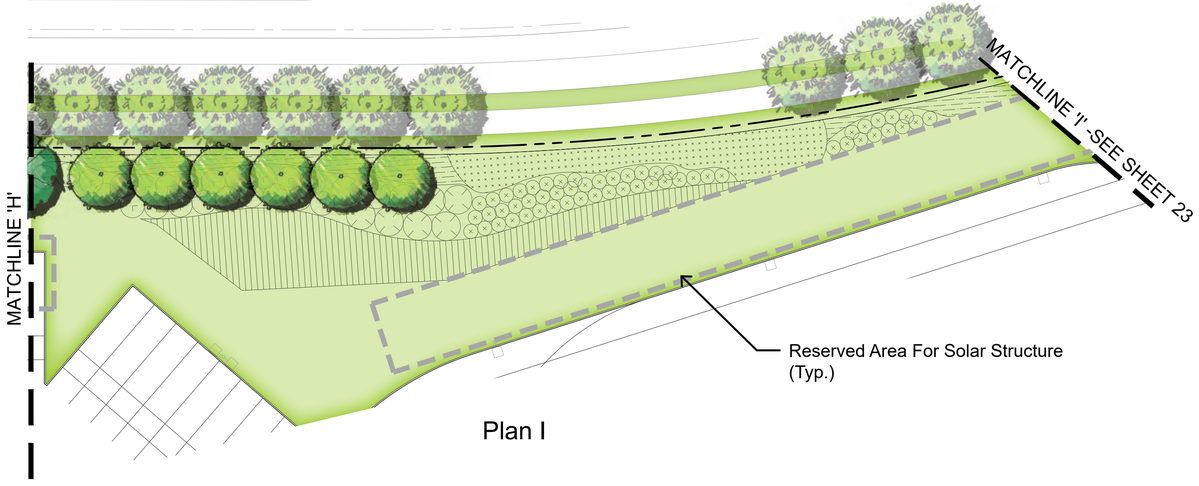
SCALE 1"=30'

AUGUST 7, 2024

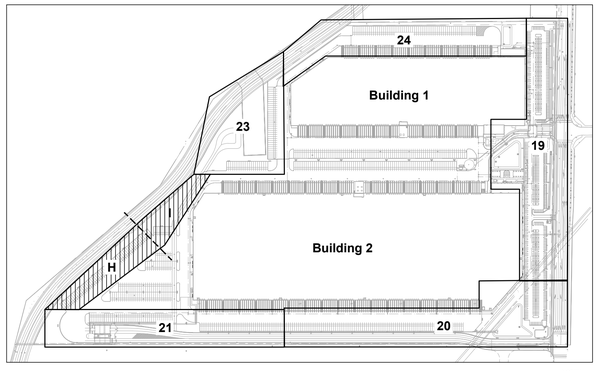
NORTH



Plan H



Plan I



KEY PLAN
N.T.S

NORTH

DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

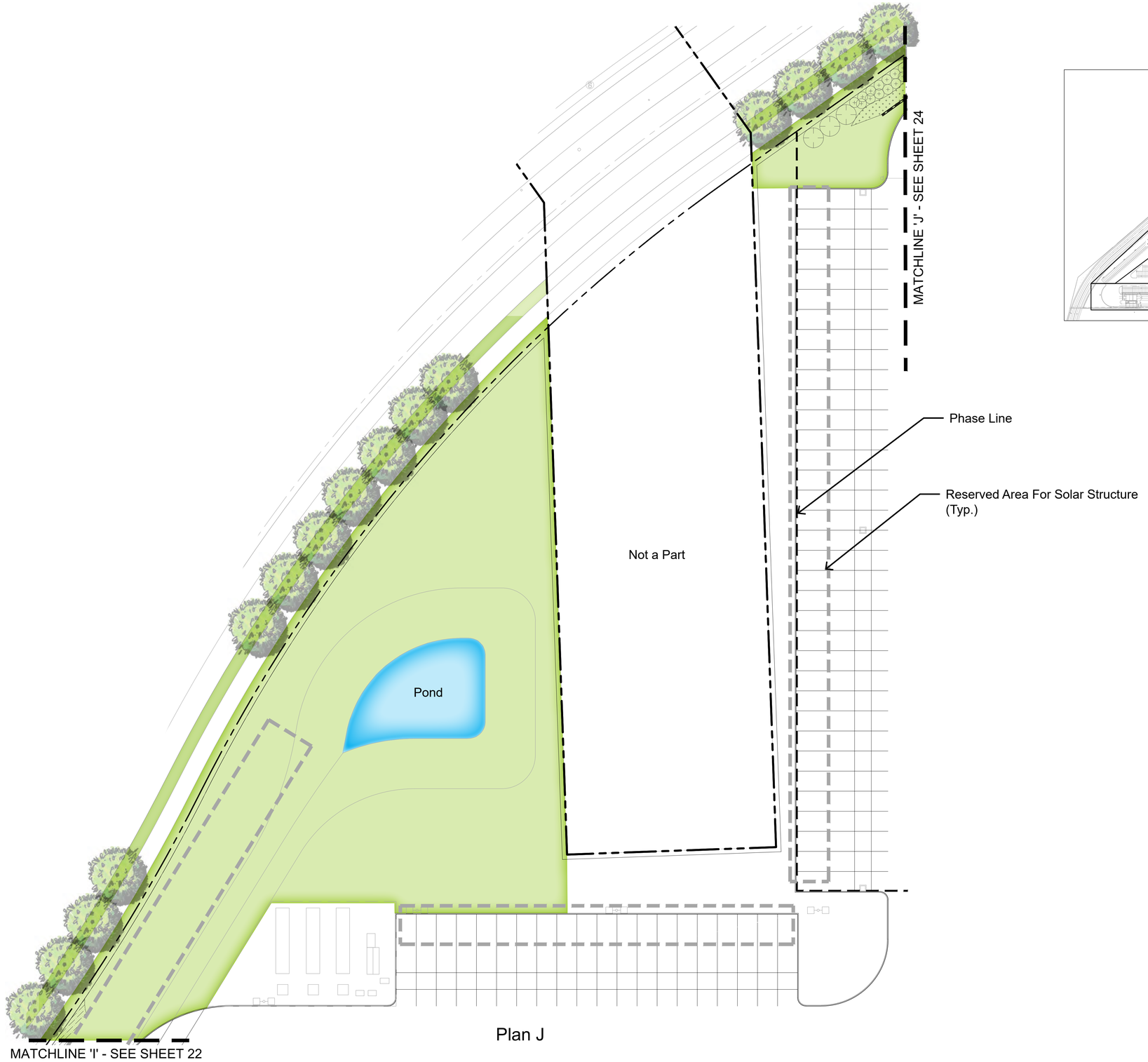
PRELIMINARY UNDERSTORY LANDSCAPE PLAN

0 15' 30' 60'

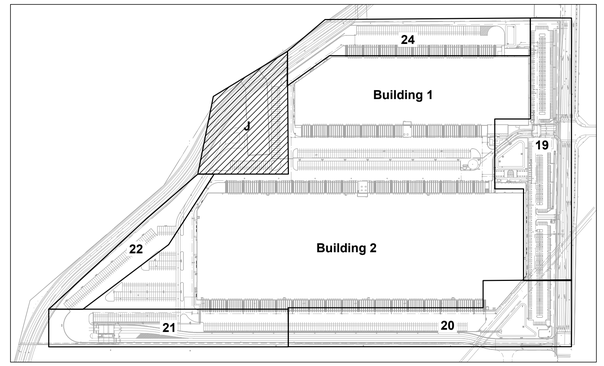
SCALE 1"=30'

AUGUST 7, 2024

NORTH



Plan J



KEY PLAN
N.T.S

DBA #P.281

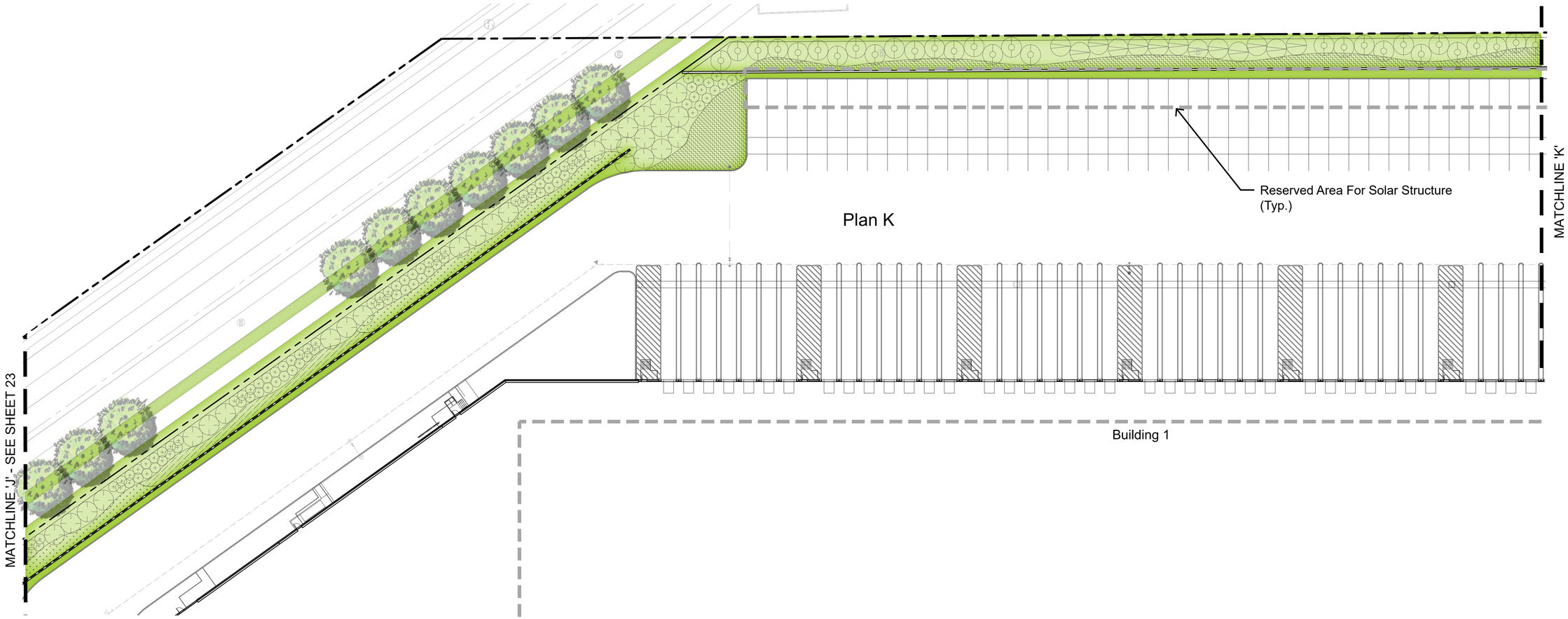
DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD. , SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

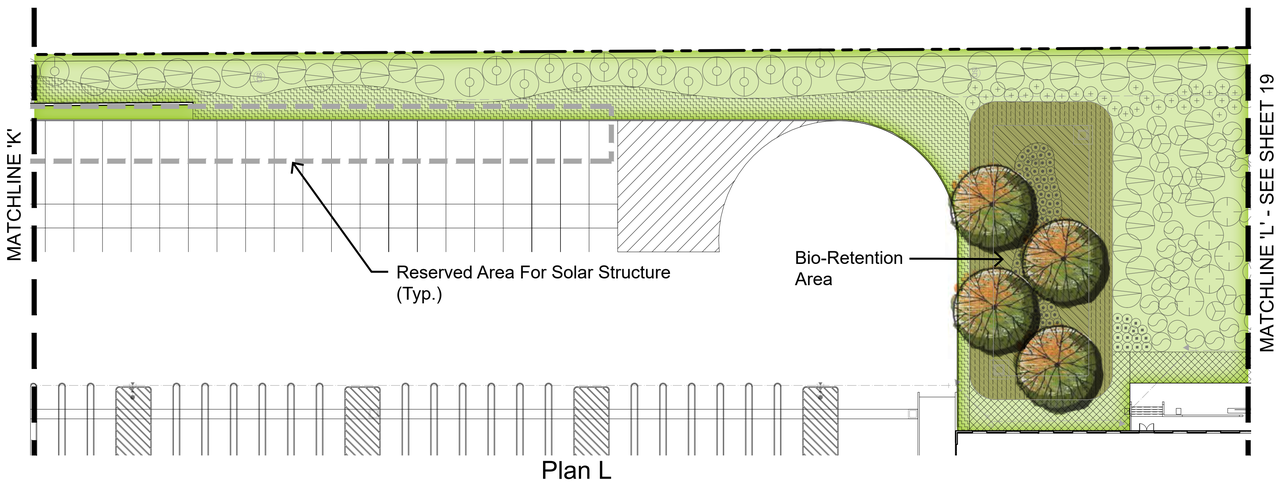
COSTCO FACILITIES

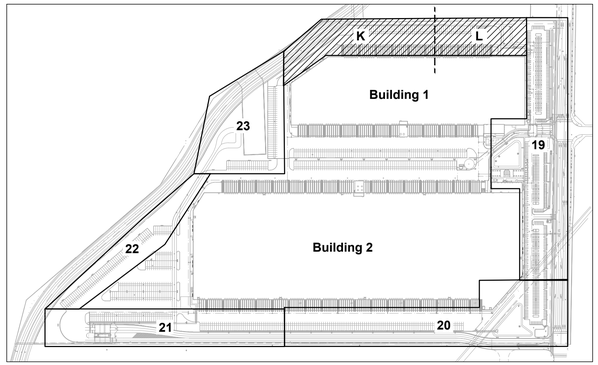
PRELIMINARY UNDERSTORY LANDSCAPE PLAN

0 15' 30' 60'
SCALE 1"=30'
AUGUST 7, 2024

NORTH







KEY PLAN
N.T.S

NORTH

DBA #P.281

DB+A

DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD. , SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

PRELIMINARY UNDERSTORY LANDSCAPE PLAN

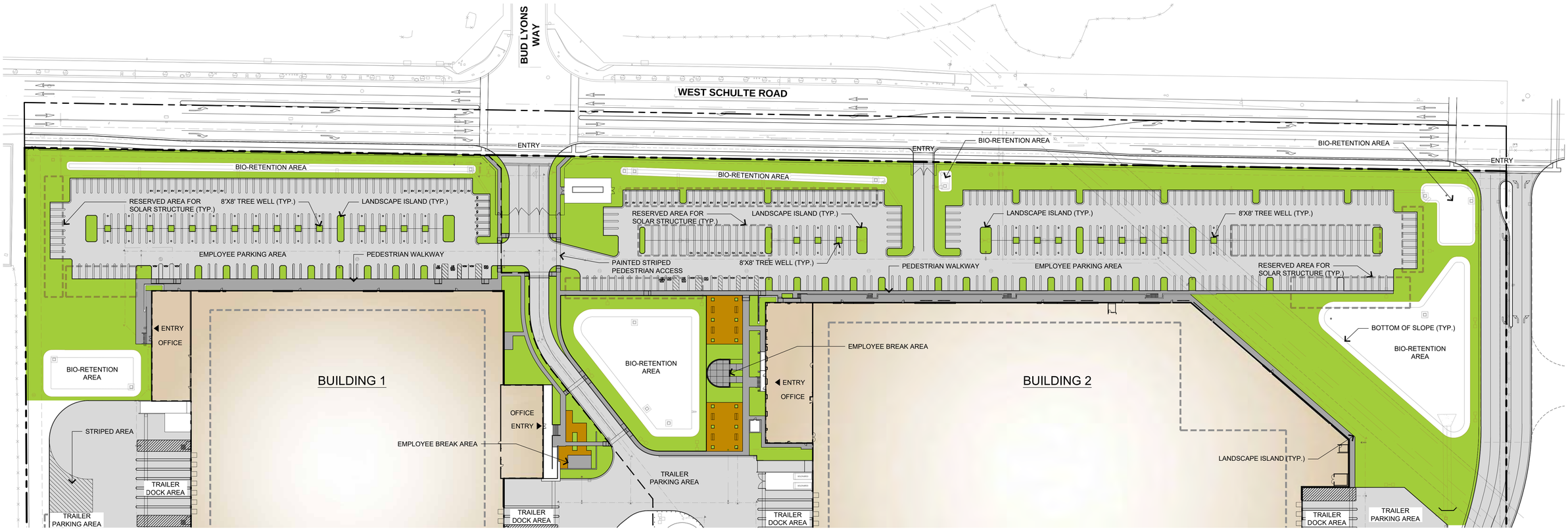
0 15' 30' 60'

SCALE 1"=30'

AUGUST 7, 2024

NORTH

SHEET 26 of 44



Hardscape Legend

- Broom Finished Concrete Surface
- Asphalt Surface
- Decomposed Granite Surface

Parking Lot Landscape Data

- Proposed Landscape Area

Parking Lot Landscape Calculations

Landscape Required: 37,766 s.f. 20% of gross area of parking lot (188,832 s.f.)

Landscape Provided: 160,726 s.f.

DBA #P.281

DB+A
DAVID BABCOCK + ASSOCIATES
ARCHITECTURE PLANNING LANDSCAPE
3581 MT. DIABLO BLVD., SUITE 235
LAFAYETTE, CALIFORNIA 94549
T: 925.283.5070

COSTCO FACILITIES

LANDSCAPE CALCULATIONS AND HARDSCAPE PLAN

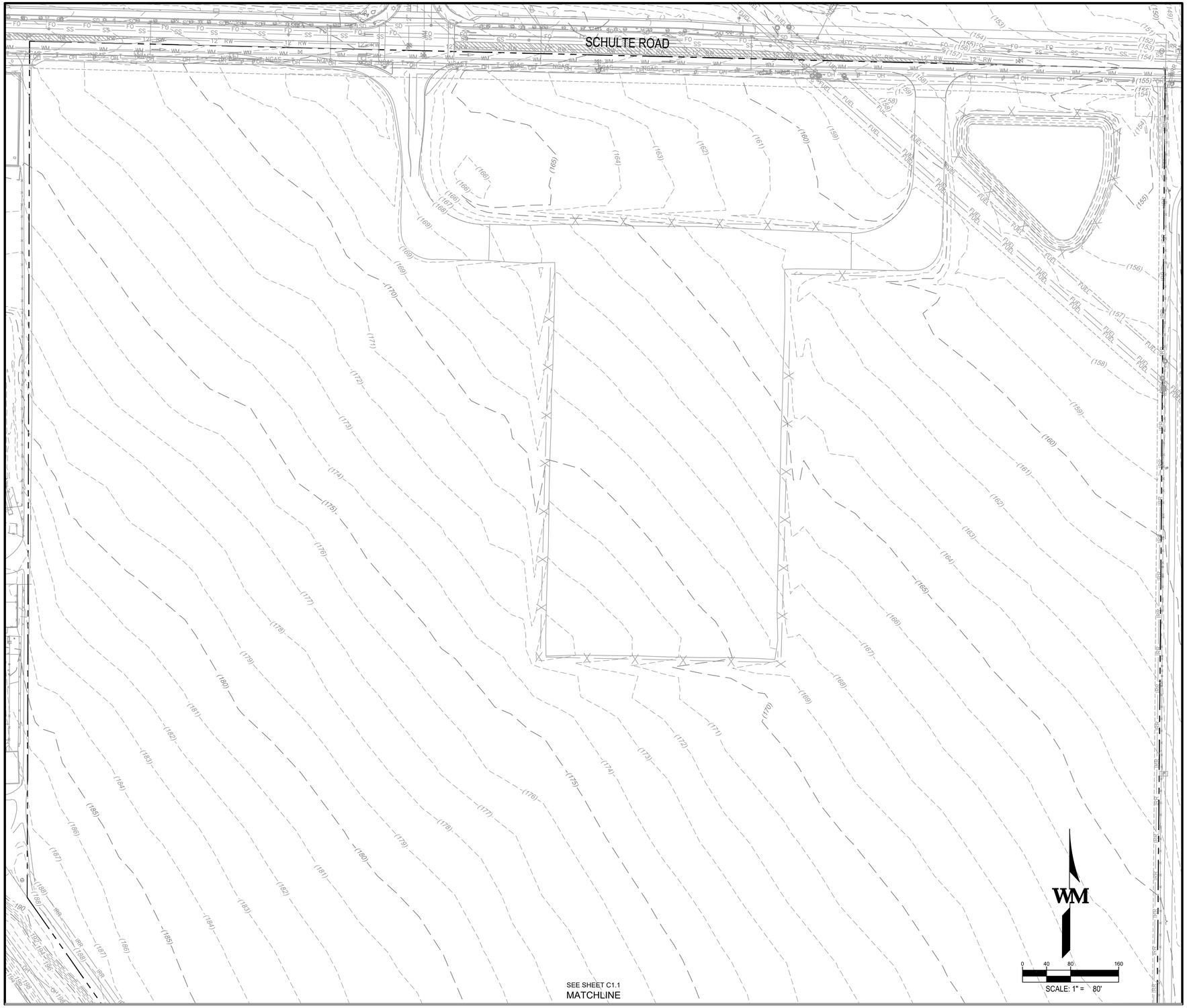
0 30' 60' 120'

SCALE 1"=60'

AUGUST 7, 2024

NORTH

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



LEGEND

EXISTING

- BOUNDARY
- LOT LINE
- EASEMENT
- CENTERLINE
- (5280) MAJOR CONTOUR
- (5278) MINOR CONTOUR
- CURB / GUTTER
- BUILDING
- SIDEWALK
- CURB RAMPS
- X FENCE
- SIGN
- B BOLLARD
- PAVEMENT MARKINGS
- CROSSWALK STRIPING
- TREES
- N/A SAWCUT
- STORM DRAIN
- CATCH BASIN
- C.O. STORM CLEANOUT
- FLARED END SECTION
- ST STORM INLET
- ST STORM MANHOLE
- STORM PLUG
- DD ROOF DRAIN
- SS SANITARY
- C.O. SANITARY CLEANOUT
- SS SANITARY MANHOLE
- SANITARY PLUG
- WM WATERLINE
- FIRE HYDRANT
- WATER VALVE
- WATER REDUCER
- WATER FITTINGS
- M WATER METER
- WATER PLUG
- WA WATER MANHOLE
- PRV WATER PRV
- H2O WATER VAULT
- IRR IRRIGATION
- RCB IRR CONTROL BOX
- IR IRR METER
- IR IRR VALVE
- IRVLT IRR VAULT
- OH OVERHEAD UTILITY
- UTILITY POLE
- DOWN GUY
- LIGHT POLE
- TB TRAFFIC BOX
- TRAFFIC POLE
- CATV CABLE TV
- TV CATV PEDESTAL
- E BURIED ELECTRIC
- AC A/C UNIT
- EBKR BREAKER PANEL
- GEN GENERATOR
- EJB JUNCTION BOX
- E ELEC METER
- E ELEC MANHOLE
- E ELEC PEDESTAL
- ETRANS TRANSFORMER
- E ELEC VAULT
- FO FIBER OPTIC
- FO FO MANHOLE
- FO FO PEDESTAL
- FP FO PULLBOX
- FOVLT FO VAULT
- NGAS NATURAL GAS
- G GAS METER
- GAS VALVE
- GAS VENT
- GAS WELL
- T TELEPHONE
- TB TELE BOOTH
- T TELE MANHOLE
- T TELE PEDESTAL
- UKWN UNKNOWN UTILITY
- UN V UNKNOWN STRCTURE

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE

4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF
OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

TOPOGRAPHIC SURVEY
(SHEET 1 OF 2)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

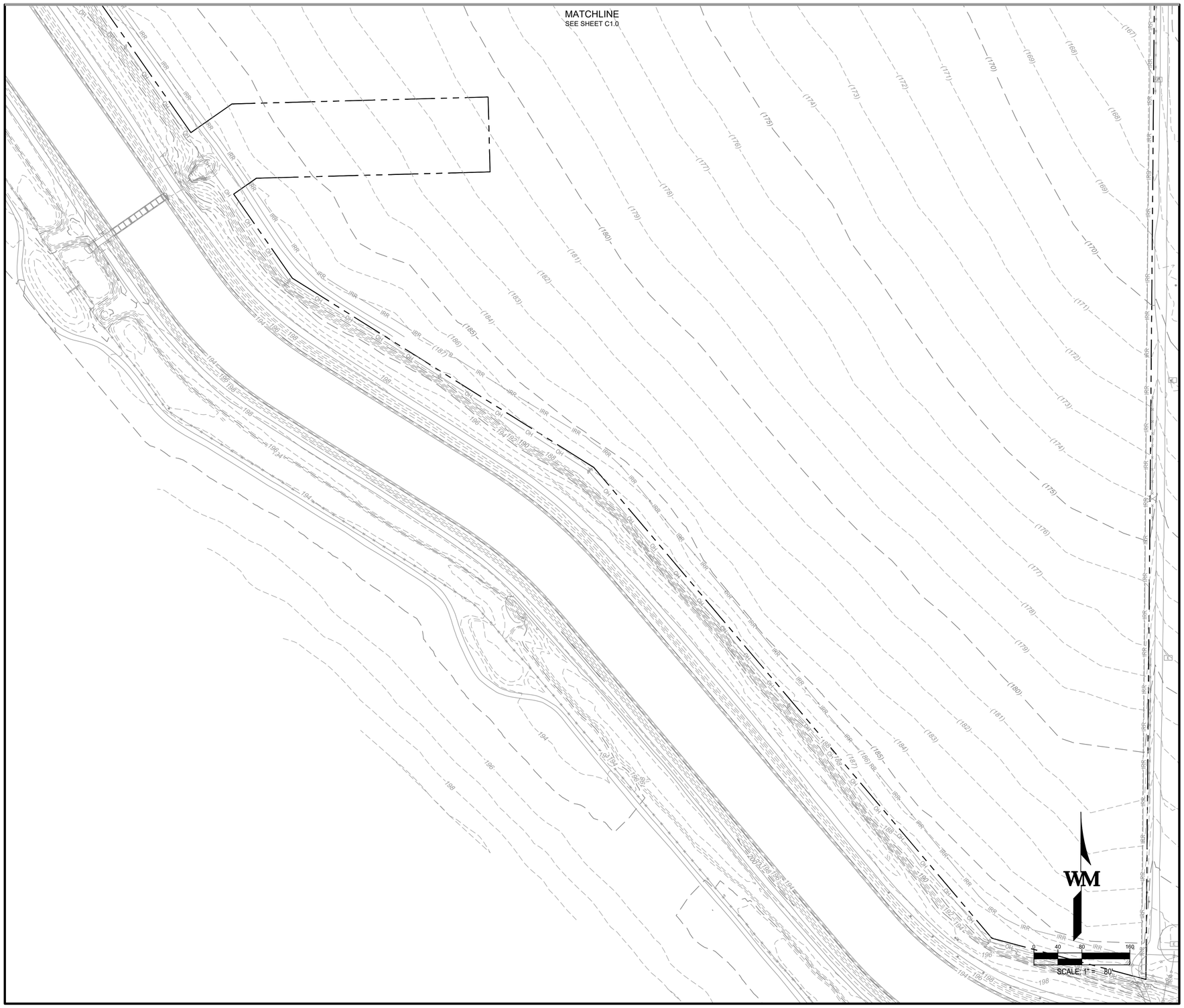
SHEET
C1.0
Sheet 1 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK

NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C1.0_Topographic Survey.dwg 11/2/2022 9:42 AM VBAIONI 1:1

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



LEGEND

EXISTING

- BOUNDARY
- LOT LINE
- EASEMENT
- CENTERLINE
- (5280) MAJOR CONTOUR
- (5278) MINOR CONTOUR
- CURB / GUTTER
- BUILDING
- SIDEWALK
- CURB RAMPS
- X FENCE
- SIGN
- B BOLLARD
- PAVEMENT MARKINGS
- CROSSWALK STRIPING
- TREES
- N/A SAWCUT
- STORM DRAIN
- CATCH BASIN
- C.O. STORM CLEANOUT
- FLARED END SECTION
- ST STORM INLET
- ST STORM MANHOLE
- STORM PLUG
- DD ROOF DRAIN
- SS SANITARY
- C.O. SANITARY CLEANOUT
- SS SANITARY MANHOLE
- SANITARY PLUG
- WM WATERLINE
- FIRE HYDRANT
- WATER VALVE
- WATER REDUCER
- WATER FITTINGS
- M WATER METER
- WATER PLUG
- WA WATER MANHOLE
- PRV WATER PRV
- H2O WATER VAULT
- IRR IRRIGATION
- RCB IRR CONTROL BOX
- IR IRR METER
- IRR VALVE
- IRVLT IRR VAULT
- OH OVERHEAD UTILITY
- UTILITY POLE
- DOWN GUY
- LIGHT POLE
- TB TRAFFIC BOX
- TRAFFIC POLE
- CATV CABLE TV
- TV CATV PEDESTAL
- E BURIED ELECTRIC
- AC A/C UNIT
- EBKR BREAKER PANEL
- GEN GENERATOR
- EJB JUNCTION BOX
- E ELEC METER
- E ELEC MANHOLE
- E ELEC PEDESTAL
- ETRANS TRANSFORMER
- E ELEC VAULT
- FO FIBER OPTIC
- FO FO MANHOLE
- FO FO PEDESTAL
- FP FO PULLBOX
- FOVLT FO VAULT
- NGAS NATURAL GAS
- G GAS METER
- GAS VALVE
- GAS VENT
- GAS WELL
- T TELEPHONE
- TB TELE BOOTH
- T TELE MANHOLE
- T TELE PEDESTAL
- UKWN UNKNOWN UTILITY
- UN U UNKNOWN STRCTURE

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE

4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF
OF WARE MALCOMB

TRACY COSTCO HOM

COSTCO WHOLESALE
TRACY, CALIFORNIA

TOPOGRAPHIC SURVEY
(SHEET 2 OF 2)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

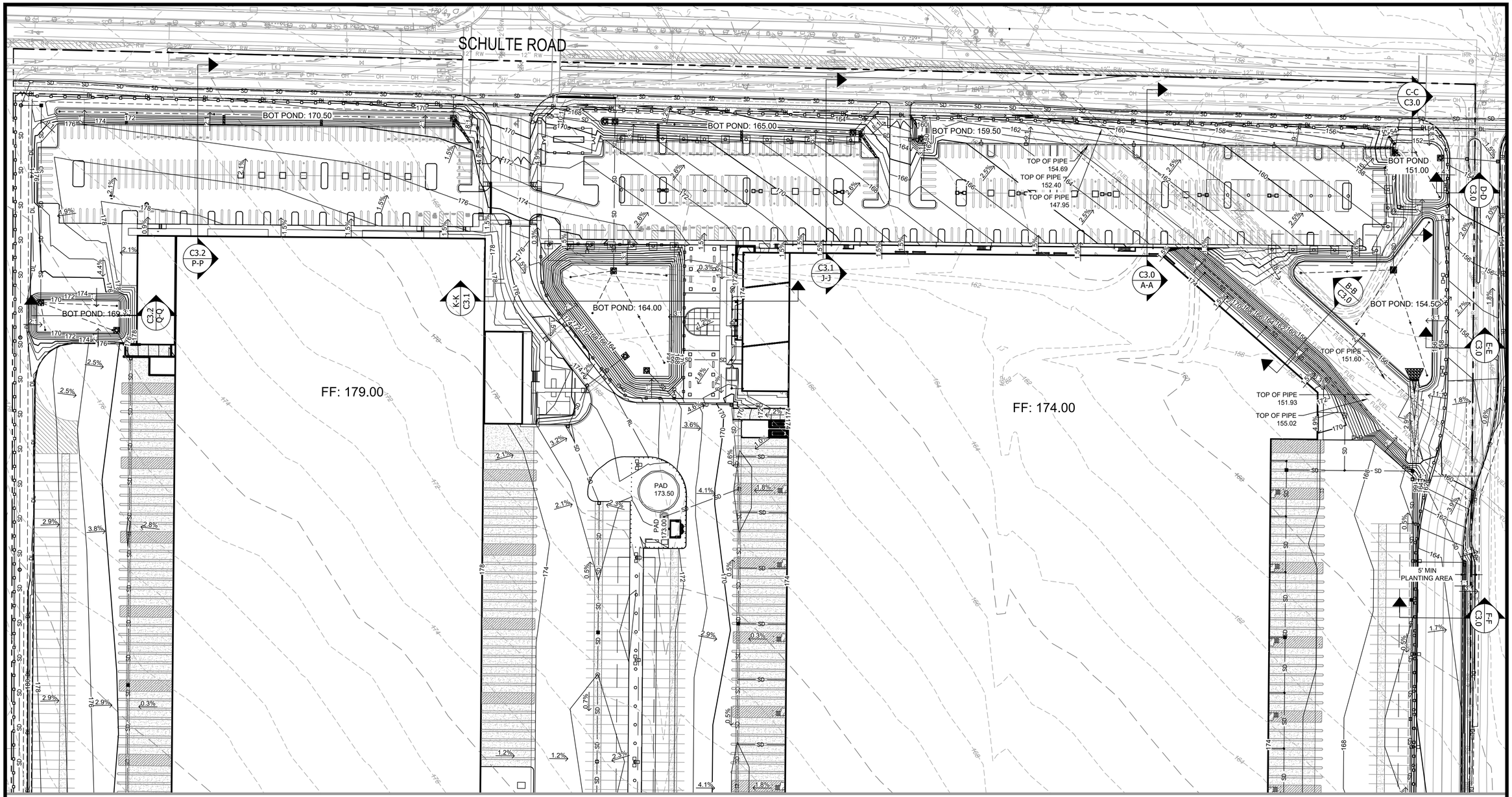
SHEET
C1.1
Sheet 2 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK.
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C1.0_Topographic Survey.dwg 11/2/2022 9:42 AM VBAIONI 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C1.0_Topographic Survey.dwg, 8/2/2024 12:14:45 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



MATCHLINE
SEE SHEET C2.1

EARTHWORK QUANTITIES

CUT:	424,280 C.Y.
FILL:	424,280 C.Y.
EXPORT:	0 C.Y.
IMPORT:	0 C.Y.

OVER EXCAVATION:
335,779 C.Y. OF CUT/FILL

QUANTITIES SHOWN ARE "FINISH GRADE" TO "EXISTING GRADE" CALCULATIONS. NO SHRINK, SWELL, OR COMPACTION FACTORS SHOWN. PAVEMENT SECTIONS, BUILDING PAD SECTIONS, TRENCH SPOILS, AND FOUNDATION SPOILS AND OTHERS HAVE BEEN INCLUDED IN THE CALCULATIONS AND SHOULD BE VERIFIED BY THE CONTRACTOR. QUANTITIES ARE SHOWN FOR INFORMATION ONLY AND SHALL BE CONFIRMED BY CONTRACTOR PRIOR TO THE START OF CONSTRUCTION. ALL EARTHWORK OPERATIONS SHALL BE PREPARED PER THE GEOTECHNICAL REPORT INCLUDING SUBGRADE PREPARATION AND DEPTHS.

WM

0 30 60 120
SCALE: 1" = 60'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

PRELIMINARY GRADING PLAN
(SHEET 1 OF 3)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

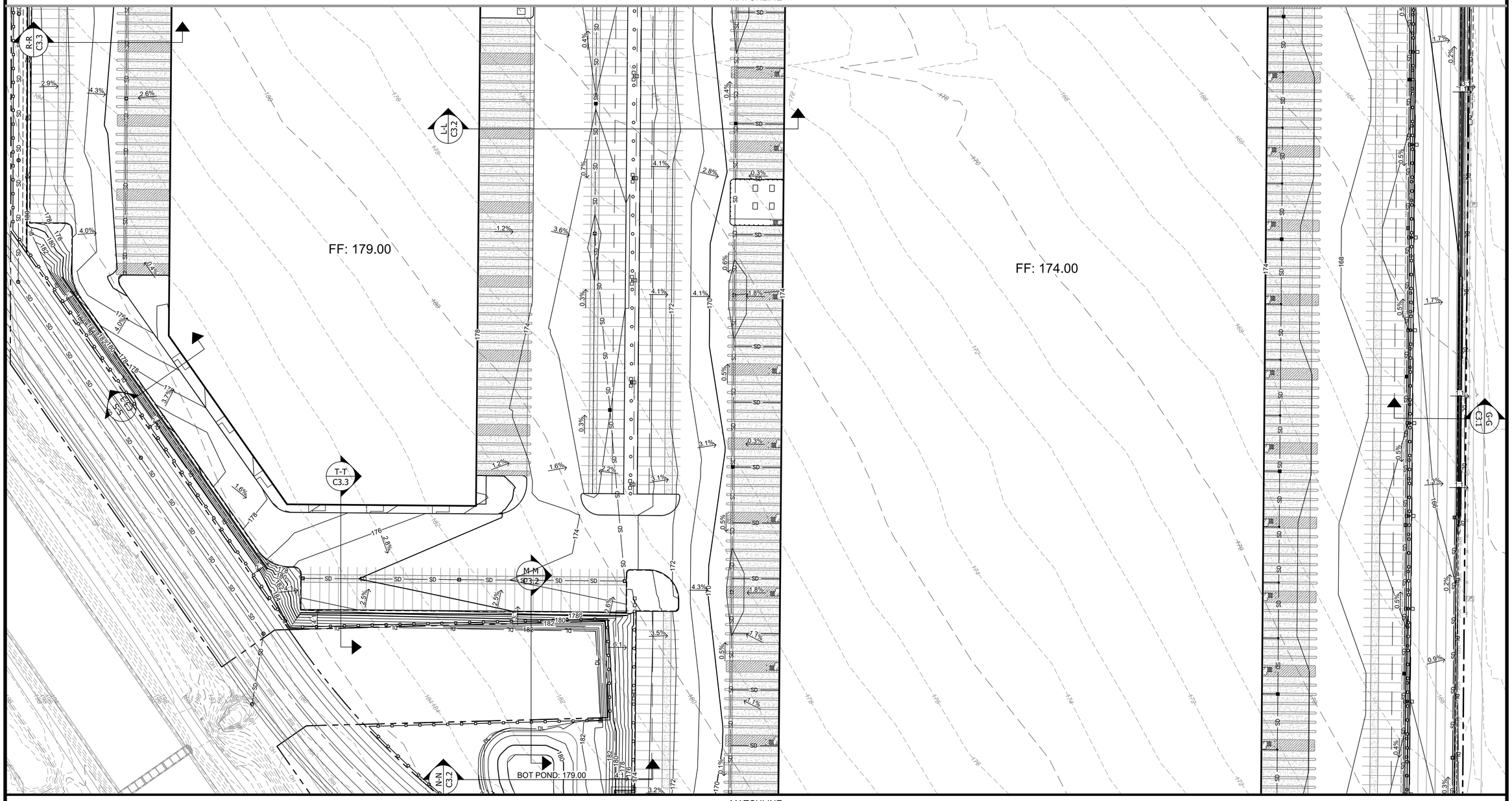
JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C2.0
Sheet 3 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK.
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C2.0_Grading Plan.dwg 11/1/2022 7:46 PM JLORENZO 1:1
\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C2.0_Grading Plan.dwg, 8/2/2024 12:18:26 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM

COSTCO WHOLESALE
TRACY, CALIFORNIA

PRELIMINARY GRADING PLAN
(SHEET 2 OF 3)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C2.1
Sheet 4 of 17

SCALE: 1" = 60'

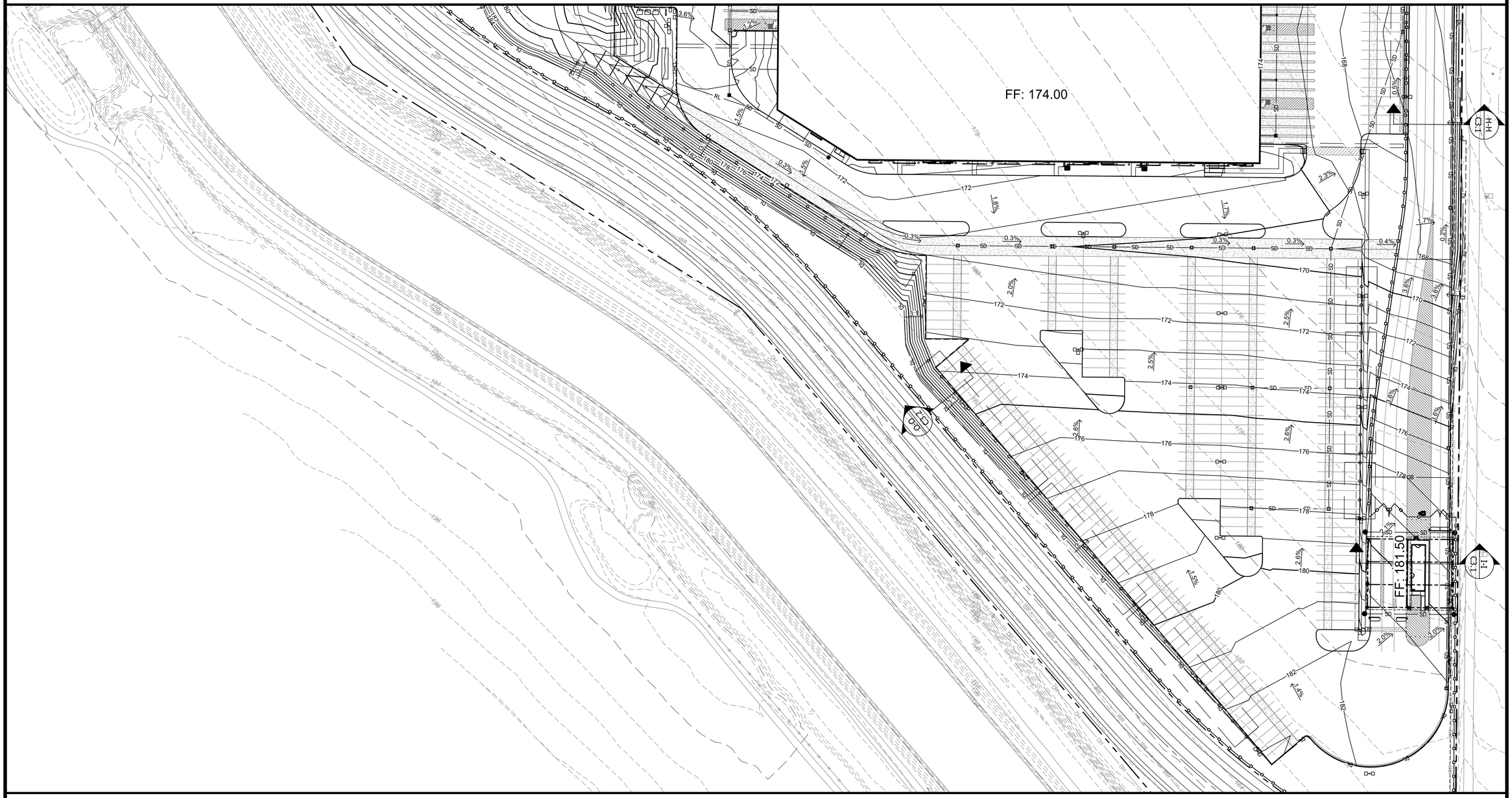
THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK
NOT FOR CONSTRUCTION

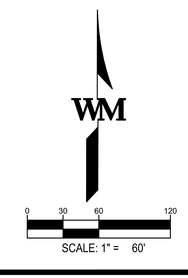
\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C2.0_Grading Plan.dwg 11/1/2022 7:46 PM JLORENZO 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C2.0_Grading Plan.dwg, 8/2/2024 12:18:41 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT

SEE SHEET C2.1
MATCHLINE





WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE

4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF
OF WARE MALCOMB

TRACY COSTCO HOM

COSTCO WHOLESALE
TRACY, CALIFORNIA

PRELIMINARY GRADING PLAN
(SHEET 3 OF 3)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C2.2
Sheet 5 of 17

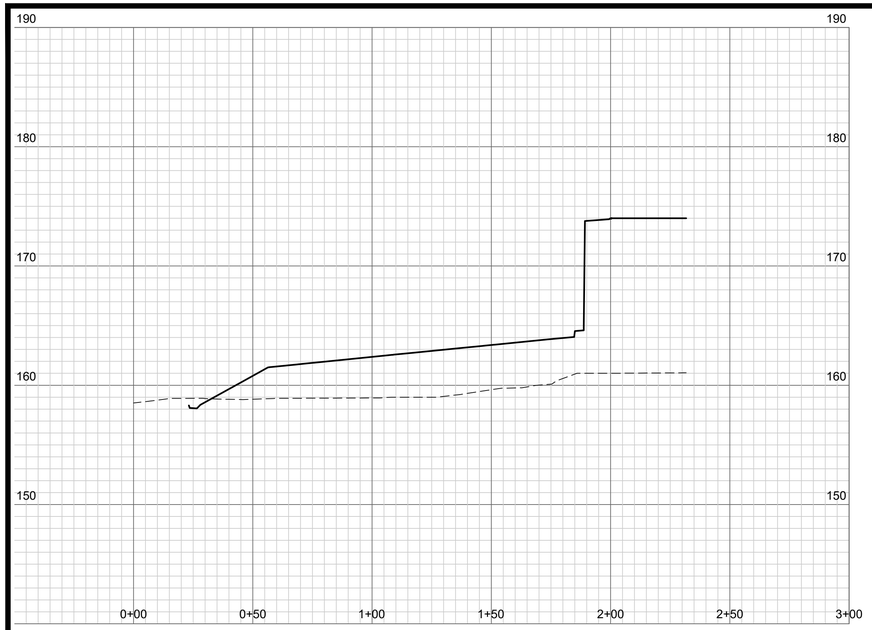
THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK

NOT FOR CONSTRUCTION

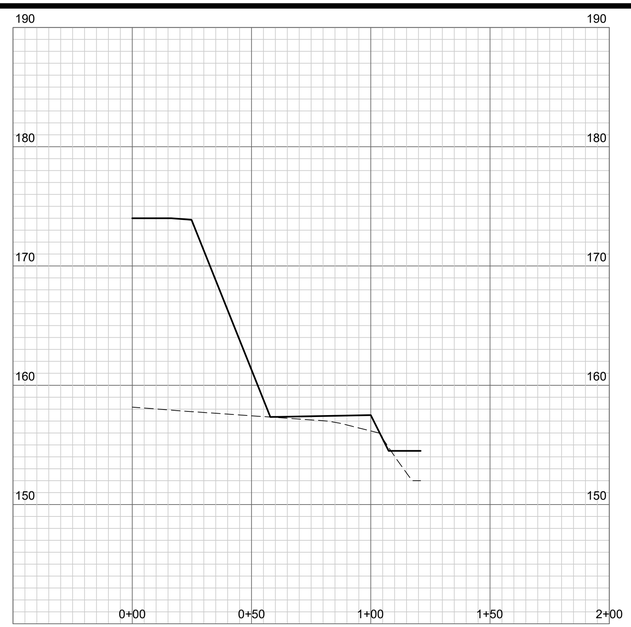
\\Wma-arch.com\wm\SNR22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C2.0_Grading Plan.dwg 11/1/2022 7:46 PM JLORENZO 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C2.0_Grading Plan.dwg, 8/2/2024 12:18:56 PM, _DWG To PDF.pc3

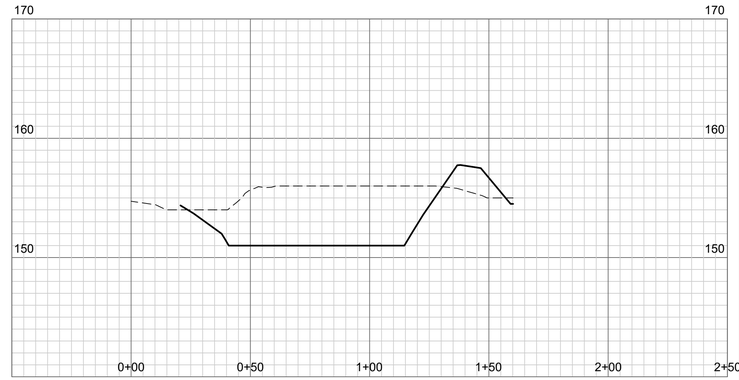
CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



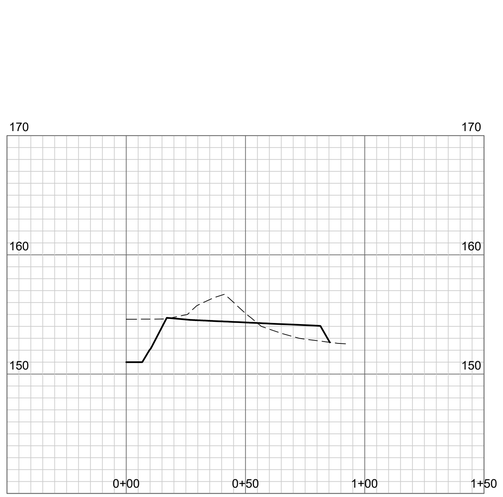
SECTION A-A
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



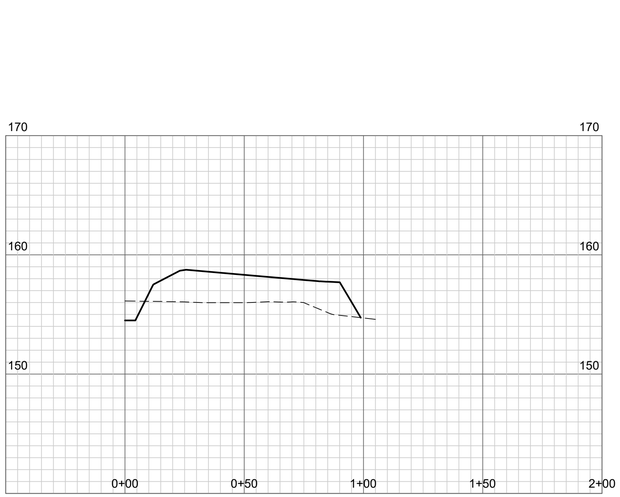
SECTION B-B
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION C-C
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION D-D
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION E-E
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION F-F
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF
OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

PRELIMINARY GRADING SECTIONS
(SHEET 1 OF 4)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C3.0
Sheet 6 of 17

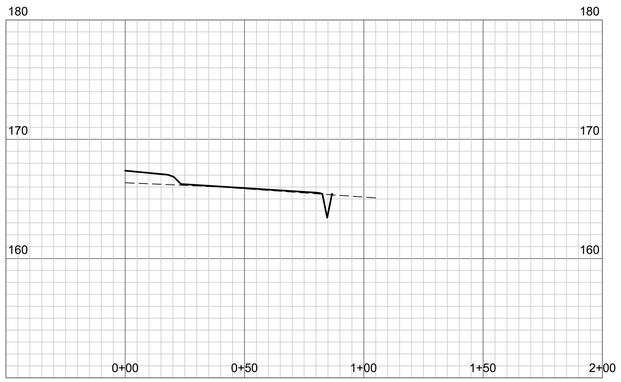
THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK

NOT FOR CONSTRUCTION

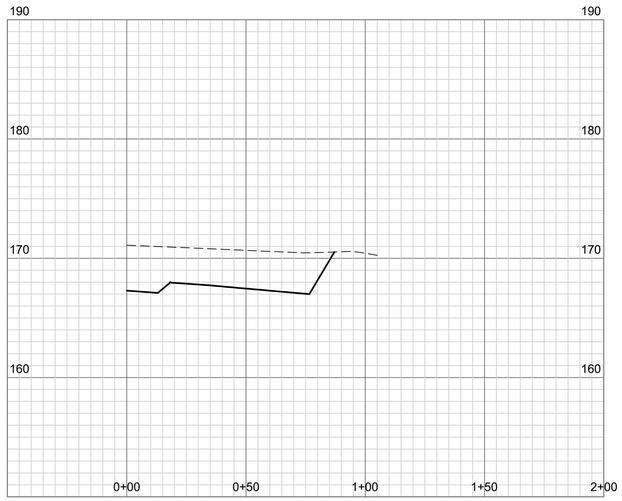
\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg, 8/2/2024 12:29:06 PM, _DWG To PDF.pc3

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg 11/2/2022 3:06 PM VBAIONI 1:1

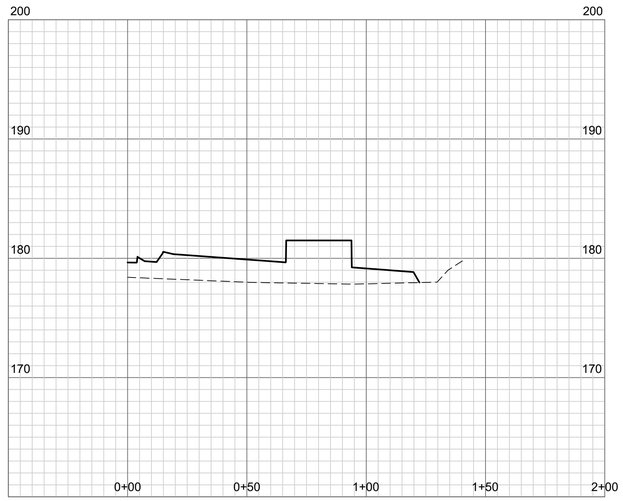
CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



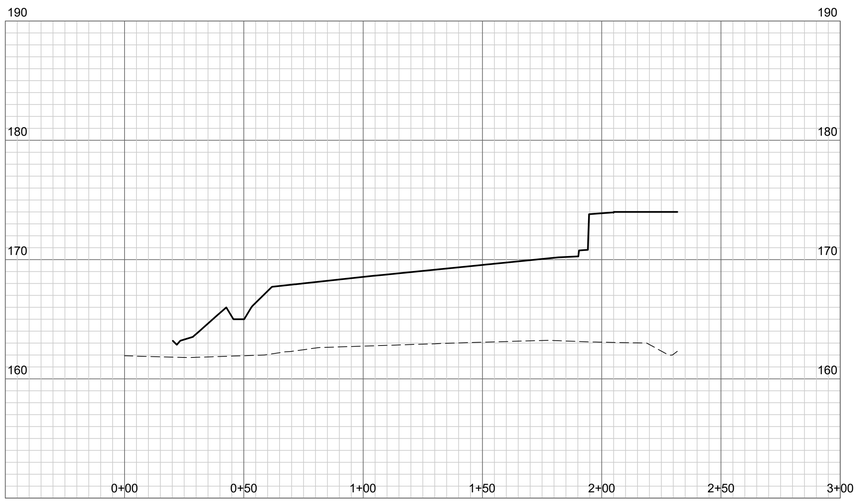
SECTION G-G
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION H-H
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION I-I
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION J-J
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION K-K
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p 925.244.9620
waremalcomb.com

FOR AND ON BEHALF
OF WARE MALCOMB

TRACY COSTCO HOM

COSTCO WHOLESALE
TRACY, CALIFORNIA

PRELIMINARY GRADING SECTIONS
(SHEET 2 OF 4)

NO.	DATE	REMARKS
1	11.04.2022	PLANNING SUBMITTAL
2	06.02.2023	PLANNING RESUBMITTAL
3	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C3.1
Sheet 7 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK.

NOT FOR CONSTRUCTION

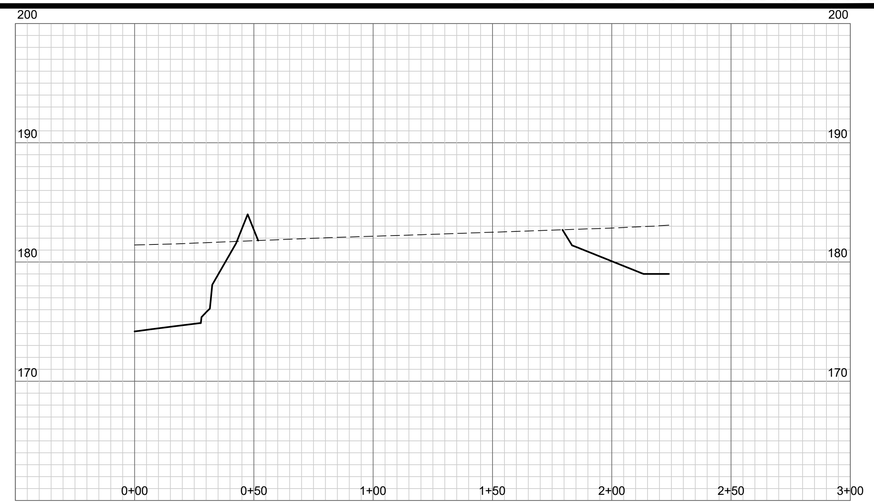
\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg 11/2/2022 3:06 PM VBAIONI 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg, 8/2/2024 12:29:12 PM, _DWG To PDF.pc3

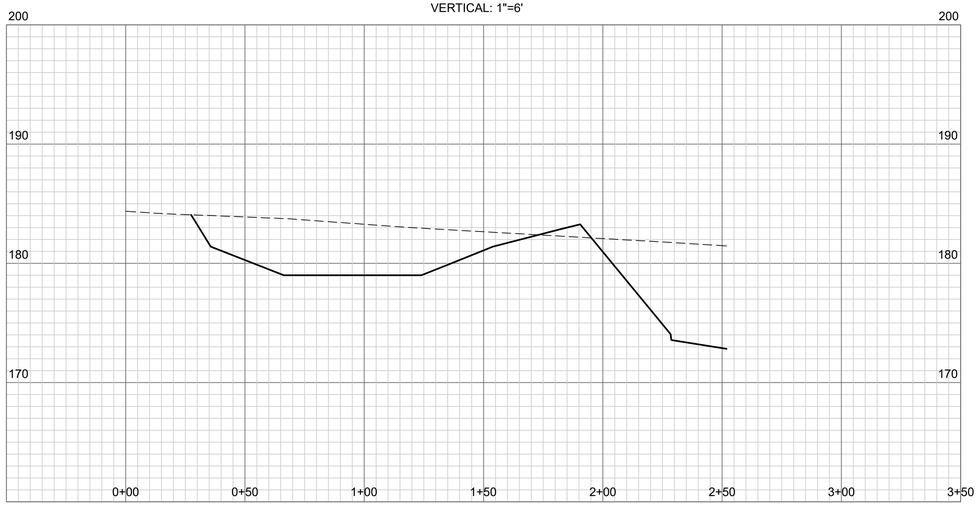
CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



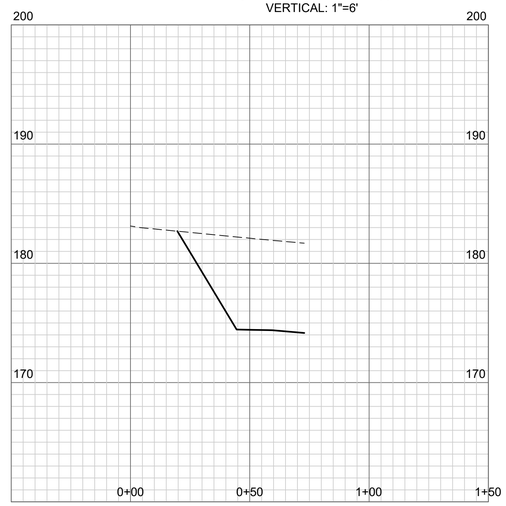
SECTION L-L
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



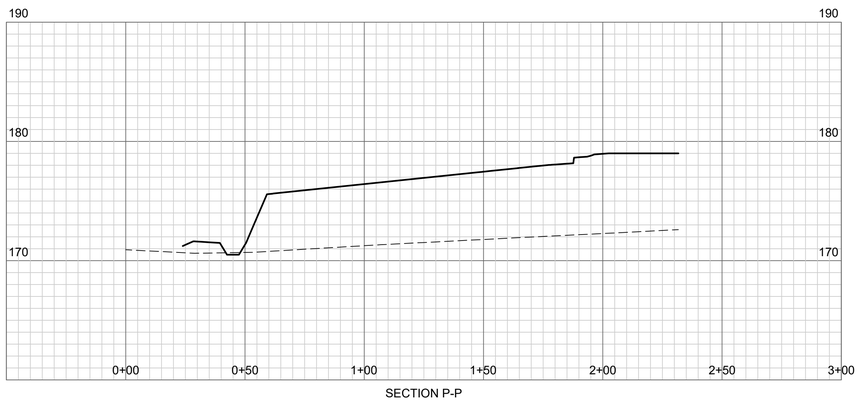
SECTION M-M
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



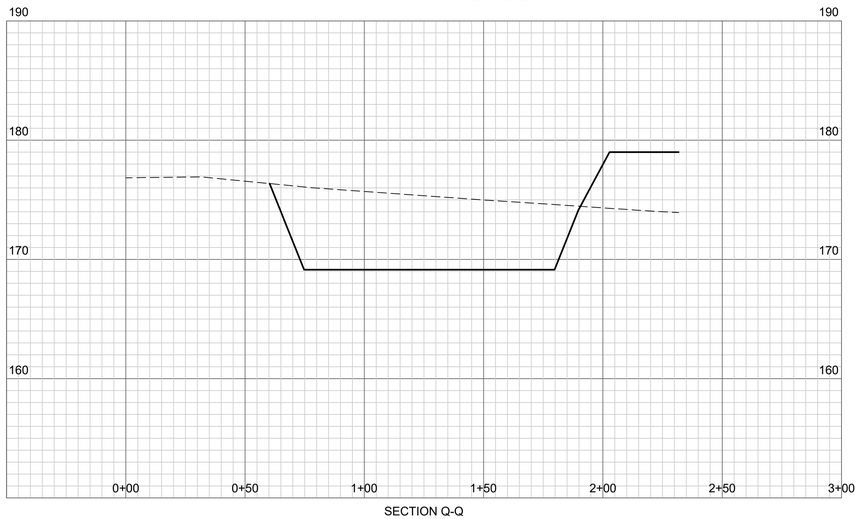
SECTION N-N
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION O-O
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION P-P
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION Q-Q
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF
OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

PRELIMINARY GRADING SECTIONS
(SHEET 3 OF 4)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C3.2
Sheet 8 of 17

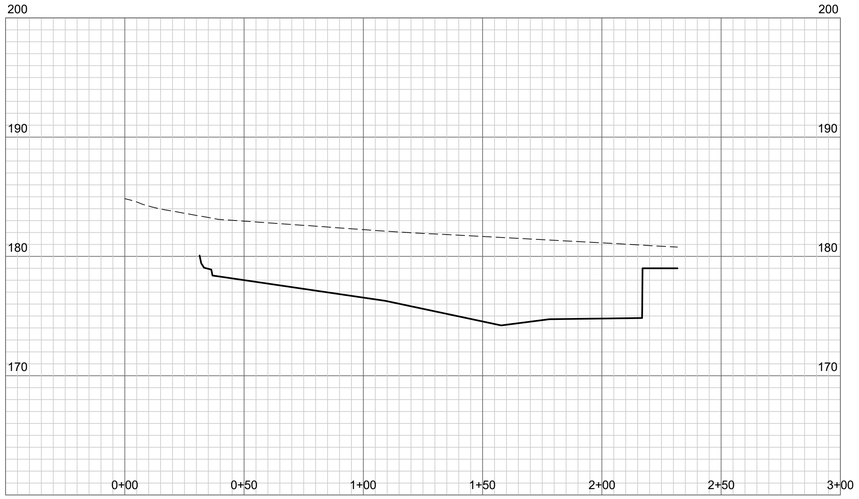
THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK.

NOT FOR CONSTRUCTION

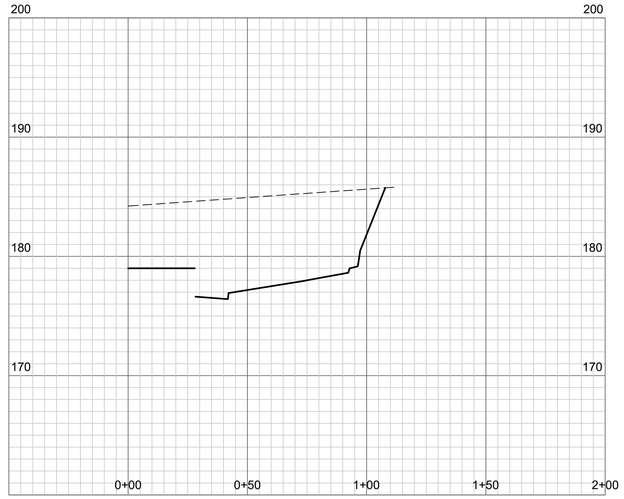
\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg 11/2/2022 3:06 PM VBAION 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg, 8/2/2024 12:29:17 PM, _DWG To PDF.pc3

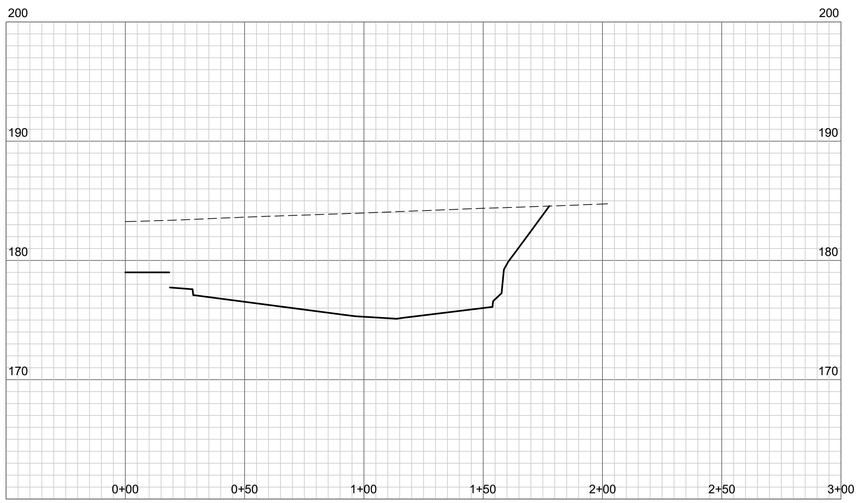
CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



SECTION R-R
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION S-S
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'



SECTION T-T
SCALE: HORIZONTAL: 1"=30'
VERTICAL: 1"=6'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF
OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

PRELIMINARY GRADING SECTIONS
(SHEET 4 OF 4)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

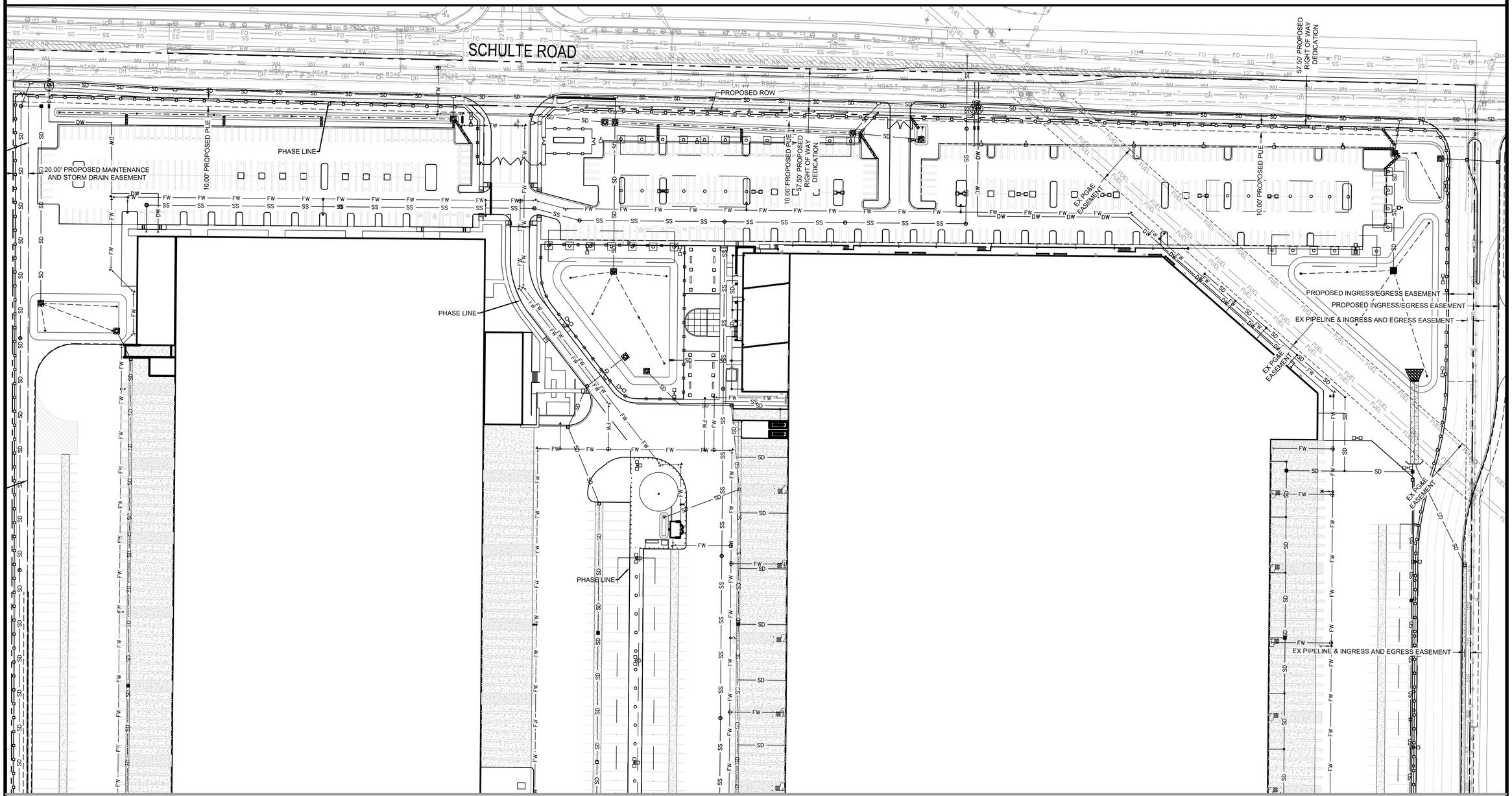
SHEET
C3.3
Sheet 9 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg 11/2/2022 3:06 PM VBAIONI 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C3.0_Grading Sections.dwg, 8/2/2024 12:29:22 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



0 30 60 120

SCALE: 1" = 60'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORN

UTILITY PLAN
(SHEET 1 OF 3)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C4.0
Sheet 10 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK

NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C4.0_Utility Plan.dwg 11/2/2022 1:17 PM VBAIONI 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C4.0_Utility Plan.dwg, 8/2/2024 12:38:49 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT

SEE SHEET C4.0
MATCHLINE

20.00' PROPOSED MAINTENANCE AND STORM DRAIN EASEMENT

99.0' RIGHT OF WAY DEDICATION FOR FUTURE HANSEN ROAD

99.0' RIGHT OF WAY DEDICATION FOR FUTURE HANSEN ROAD

PHASE LINE

PHASE LINE

PHASE LINE

EX PIPELINE & INGRESS AND EGRESS EASEMENT

MATCHLINE
SEE SHEET C4.2

0 30 60 120
SCALE: 1" = 60'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM

COSTCO WHOLESALE
TRACY, CALIFORNIA

UTILITY PLAN
(SHEET 2 OF 3)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C4.1
Sheet 11 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK

NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C4.0_Utility Plan.dwg, 8/2/2024 12:39:08 PM, _DWG To PDF.pc3

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C4.0_Utility Plan.dwg 11/2/2022 1:17 PM VBA\ONI 1:1

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT

SEE SHEET C4.1
MATCHLINE

99.0' RIGHT OF WAY DEDICATION FOR FUTURE HANSEN ROAD

99.0' RIGHT OF WAY DEDICATION FOR FUTURE HANSEN ROAD

EX PIPELINE & INGRESS AND EGRESS EASEMENT

SCALE: 1" = 60'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE

4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM

COSTCO WHOLESALE
TRACY, CALIFORNIA

UTILITY PLAN
(SHEET 3 OF 3)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C4.2
Sheet 12 of 17

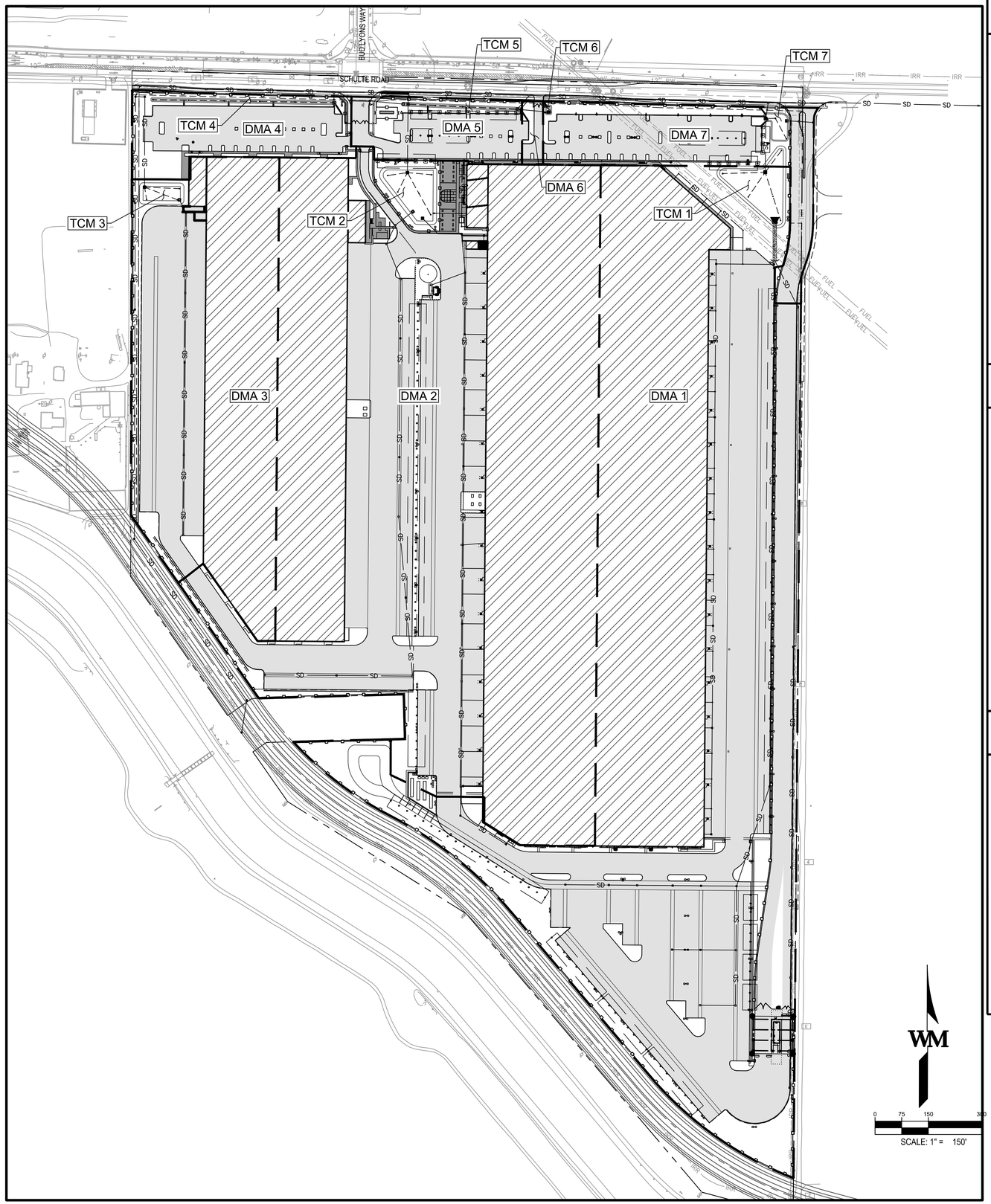
THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK

NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C4.0_Utility Plan.dwg 11/2/2022 1:17 PM VBAIONI 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C4.0_Utility Plan.dwg, 8/2/2024 12:39:23 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



PERVIOUS AND IMPERVIOUS SURFACES COMPARISON TABLE

PERVIOUS AND IMPERVIOUS SURFACES COMPARISON TABLE			
Project Phase Number:			N/A
Total Site (acres):	94.544	Total Area of Site Disturbed (acres):	94.544
Impervious Surfaces	Existing Condition of Site Area Disturbed	Proposed Condition of Site Area Disturbed (square feet)	
		Replaced	New
Roof Area(s)	0	0	1,744,250
Parking	0	0	1,723,830
Sidewalks, Patios, Paths, etc	0	0	40,900
Streets (Public)	0	0	0
Streets (Private)	0	0	0
Total Impervious Surfaces	0	0	3,508,980
Pervious Surfaces			
Landscaped Areas	4,118,340	0	609,360
Pervious Paving	0	0	0
Other Pervious Surfaces (green roof, etc.)	0	0	0
Total Pervious Surfaces:	4,118,340	0	609,360
	Total Proposed Replaced + New Impervious Surfaces:		3,508,980
	Total Proposed Replaced + New Pervious Surfaces:		609,360

TREATMENT CONTROL MEASURE SUMMARY TABLE

TREATMENT CONTROL MEASURE SUMMARY TABLE

DRAINAGE MANAGEMENT AREAS	STORMWATER CONTROL MEASURES	TCM #	TOTAL (Sq.Ft.)	IMPERVIOUS AREA (Sq.Ft.)	PERVIOUS AREA (Sq.Ft.)	BIORETENTION AREA REQUIRED (Sq. Ft.)	BIORETENTION AREA PROVIDED (Sq.Ft.)	OVERFLOW RISER HEIGHT (IN.)
DMA 1	BIORETENTION POND*	1	1,658,000	1,363,080	294,920	18,989	19,050	24
DMA 2	BIORETENTION POND*	2	1,599,400	1,472,200	127,200	14,760	14,950	42
DMA 3	BIORETENTION POND*	3	486,800	438,900	47,900	4,326	4,450	42
DMA 4	BIORETENTION POND*	4	121,890	80,450	41,440	2,077	2,580	6
DMA 5	BIORETENTION POND*	5	83,750	28,650	55,100	1,422	1,500	6
DMA 6	BIORETENTION POND*	6	10,700	5,600	5,100	84	230	6
DMA 7	BIORETENTION POND*	7	157,800	120,100	37,700	3,264	3,470	18
			4,118,340	3,508,980	609,360	44,922	46,230	

*SIZING FOR BIORETENTION AREA AND VOLUMES REQUIRED CALCULATED USING THE SAN JOAQUIN COUNTY C.3 GUIDANCE MANUAL

LEGEND

- SIDEWALK AREA
- UNCOVERED PARKING
- ROOF AREA

ABBREVIATIONS

- **DMA-01** DRAINAGE MANAGEMENT AREA (BIORETENTION AREA)
- **TCM-01** TREATMENT CONTROL MEASURE

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

STORMWATER MANAGEMENT PLAN (SHEET 1 OF 5)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C5.0
Sheet 13 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK.
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg 11/2/2022 2:01 PM RAMBROSE 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg, 8/2/2024 12:41:56 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT

SOURCE CONTROL

SD-10: SITE DESIGN & LANDSCAPE PLANNING

- MAXIMIZED TREES AND PLANTING WITHIN HARDSCAPE AND LANDSCAPE AREAS.
- VEGETATED SLOPES FOR ALL LANDSCAPE SLOPES LESS THAN 1:5 SLOPE.

SD-11: EFFICIENT IRRIGATION

- RAIN-TRIGGERED SHUTOFF DEVICES TO PREVENT IRRIGATION AFTER PRECIPITATION.
- SYSTEM DESIGNED TO SITE-SPECIFIC WATER DEMANDS AND PLANTING REQUIREMENTS.

SD-13: STORM DRAIN SIGNAGE

- ALL CATCH BASINS TO BE STENCILED WITH PROHIBITIVE LANGUAGE PER CITY STANDARDS.

BIOTREATMENT SOIL REQUIREMENTS

1. BIOTREATMENT SOIL MIX (BSM) SHALL MEET THE SPECIFICATIONS IN ATTACHMENT "K" OF THE MUNICIPAL REGIONAL PERMIT (MRP), APPROVED BY THE REGIONAL WATER BOARD ON APRIL 18, 2016. THE BSM SHALL BE SUFFICIENTLY PERMEABLE TO INFILTRATE RUNOFF AT A MINIMUM RATE OF 5" PER HOUR DURING THE LIFE OF THE FACILITY, AND HAVE SUFFICIENT MOISTURE RETENTION TO SUPPORT HEALTHY VEGETATION.

   SOIL MIX MUST BE CERTIFIED IN ACCORDANCE WITH THE GUIDANCE DOCUMENTS PROVIDED BY THE ALAMEDA COUNTY STORMWATER PROGRAM HANDBOOK TITLED, "C.3 STORMWATER TECHNICAL GUIDANCE", DATED MAY 2, 2016, VERSION 5.1. AVAILABLE AT HTTP://CLEANWATERPROGRAM.ORG

   BIOTREATMENT AREAS SHALL BE CONSTRUCTED UNDER THE OBSERVATION OF THE SOILS ENGINEER.

2. PERMEABLE MATERIAL SHALL COMPLY WITH CALTRANS STANDARD SPECIFICATIONS SECTION 68-1.025, TYPE "A", CLASS 2, OR APPROVED EQUAL.

3. THE PERFORATED SUB-DRAIN SHOULD BE SET TO MATCH THE SLOPE OF THE ADJACENT CURB AND GUTTER, OR AT A 0.5% MINIMUM SLOPE OTHERWISE.

4. SEE LANDSCAPE PLANS FOR PLANTING SPECIFICATIONS. PLANT SPECIES SHALL BE IN COMPLIANCE WITH APPENDIX "C" OF THE C.3. STORMWATER TECHNICAL GUIDANCE HANDBOOK INSTALL AND MAINTAIN A 2-INCH LAYER OF COMPOSTED OR AGED MULCH BETWEEN PLANTS. ROCK, COBBLES OR LARGE, NON-FLOATING BARK MULCHES MAY ALSO BE USED, SUBJECT TO REVIEW AND APPROVAL.

BIOTREATMENT AREA MAINTENANCE

INSPECTION ACTIVITIES	SUGGESTED FREQUENCY
• INSPECT AFTER SEEDING AND AFTER FIRST MAJOR STORMS FOR ANY DAMAGES.	POST-CONTRUCTION
• INSPECT FOR SIGNS OF EROSION, DAMAGE TO VEGETATION, CHANNELIZATION OF FLOW, DEBRIS AND LITTER, AND AREAS OF SEDIMENT ACCUMULATION. PERFORM INSPECTIONS AT THE BEGINNING AND END OF THE WET SEASON. ADDITIONAL INSPECTIONS AFTER PERIODS OF HEAVY RUNOFF ARE DESIRABLE.	SEMI-ANNUAL
• INSPECT BASIN ONCE DURING THE WET SEASON AFTER A LARGE RAIN EVENT TO CONFIRM THE FACILITY IS DRAINING WITHIN 72 HOURS. IF FACILITY FAILS TO DRAIN WITHIN TIMEFRAME, REMOVE & REPLACE TOP 2" OF FILTER MEDIA.	SEMI-ANNUAL
MAINTENANCE ACTIVITIES	**SUGGESTED FREQUENCY**
• MOW GRASS TO MAINTAIN A HEIGHT OF 3-4 INCHES, FOR SAFETY, AESTHETIC, OR OTHER PURPOSES. LITTER SHOULD ALWAYS BE REMOVED PRIOR TO MOWING. CLIPPINGS SHOULD BE COMPOSTED. • IRRIGATE DURING DRY SEASON (APRIL THROUGH OCTOBER) OR WHEN NECESSARY TO MAINTAIN THE VEGETATION. • PROVIDE WEED CONTROL, IF NECESSARY TO CONTROL INVASIVE SPECIES.	AS NEEDED (FREQUENT, SEASONALLY)
• REMOVE LITTER, BRANCHES, ROCKS BLOCKAGES AND OTHER DEBRIS AND DISPOSE OF PROPERLY. • REPAIR ANY DAMAGED AREAS IDENTIFIED DURING INSPECTIONS. EROSION RILLS OR GULLIES SHOULD BE CORRECTED AS NEEDED. BARE AREAS SHOULD BE REPLANTED AS NECESSARY.	SEMI-ANNUAL
• CORRECT EROSION PROBLEMS IN THE SAND/SOIL BED.	AS NEEDED
• PLANT AN ALTERNATIVE GRASS SPECIES IF THE ORIGINAL GRASS COVER HAS NOT BEEN SUCCESSFULLY ESTABLISHED.	ANNUAL (AS NEEDED)
• RESEED AND APPLY MULCH TO DAMAGED AREAS. APPLY 1" TO 2" OF MULCH PREFERABLE IN JUNE AFTER WEEDING.	SEMI-ANNUAL
• REMOVE ALL ACCUMULATED SEDIMENT THAT MAY OBSTRUCT THE PROPER OPERATION OF THE BIO TREATMENT POND. SEDIMENT SHOULD BE REMOVED WHEN IT BUILDS UP TO 3" AT ANY SPOT, OR COVERS VEGETATION, OR ONCE IT HAS ACCUMULATED TO 10% OF THE ORIGINAL DESIGN VOLUME. REPLACE THE GRASS AREAS DAMAGED IN THE PROCESS.	AS NEEDED (INFREQUENT)
• ROTOTILL OR CULTIVATE SURFACE OF SAND/SOIL BED OF IF TREATMENT AREA DOESN'T DRAW DOWN WITHIN 48 HOURS.	AS NEEDED

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

STORMWATER MANAGEMENT PLAN (SHEET 2 OF 5)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C5.1
Sheet 14 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg 11/2/2022 2:01 PM RAMBROSE 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg, 8/2/2024 12:42:13 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT

POND CALCULATION METHODOLOGY

5.2. Stormwater Design Volume

All stormwater treatment control measures, based on the SDV, must mitigate (infiltrate or treat) the volume of stormwater runoff produced by the 85th percentile, 24-hour storm event based on historic rainfall records, determined as the maximized capture stormwater volume for the tributary area, from the formulae recommended in *Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87* (1998). This approach uses the following two regression equations to calculate the unit stormwater volume, which is multiplied by the area of the DMA to calculate the SDV for sizing volume-based stormwater treatment control measures:

$$C = 0.858 \times i^3 - 0.78 \times i^2 + 0.774 \times i + 0.04$$

Where:

C = stormwater runoff coefficient [unitless]; and
i = DMA imperviousness ratio [expressed as a decimal].

$$P_0 = (a \times C) \times P_6$$

Where:

P_0 = unit stormwater volume [in];
a = regression constant (1.963 for 48-hr drawdown); and
P_6 = mean annual runoff-producing rainfall depth [in] (see **Table 5-1**).

Table 5-1. Mean Annual Runoff-Producing Rainfall Depth

Project Location	Mean Annual Runoff-Producing Rainfall Depth	Rain Gage
Lathrop	0.36	Global Historic Climatology Data Network Station USW00023237
Lodi	0.33	Global Historic Climatology Data Network Station US1CASJ0005
Manteca	0.37	California Irrigation Management System Station #70
Patterson	0.32	Global Historic Climatology Data Network Station USC00046168
Stockton	0.36	Global Historic Climatology Data Network Station USW00023237
Tracy	0.33	California Irrigation Management System Station #167

The SDV for each DMA is calculated using the following equation:

$$SDV = A \times \frac{P_0}{12}$$

Where:

SDV = stormwater design volume [ft^3];
A = total area of DMA [ft^2]; and
P_0 = unit stormwater volume [in].

Step 4: Calculate the bottom surface area of the bioretention facility

Determine the bottom surface area (surface area at the base of side slopes, not at the top of side slopes) of the bioretention facility using the following equation:

$$A = \frac{SDV_{adj}}{d_{pz} + (\eta_{pm} \times d_{pm}) + (\eta_{gl} \times d_{gl})}$$

Where:

A = bottom surface area of bioretention facility [ft^2];
SDV_{adj} = adjusted stormwater design volume [ft^3];
d_{pz} = depth of ponding zone (0.5-1.5 ft) [ft];
η_{pm} = porosity of planting media [unitless];
d_{pm} = depth of planting media (min 1.5 ft) [ft];
η_{gl} = porosity of gravel layer [unitless]; and
d_{gl} = depth of gravel layer (min 1 ft) [ft].

The total depth of the bioretention facility must meet the following condition to ensure that the stormwater runoff will be infiltrated within the maximum drawdown time:

$$d_{pz} + (\eta_{pm} \times d_{pm}) + (\eta_{gl} \times d_{gi}) \leq \frac{f_{design}}{12} \times t_{max}$$

Where:

d_{pz} = depth of ponding zone (0.5-1.5 ft) [ft];
η_{pm} = porosity of planting media [unitless];
d_{pm} = depth of planting media (min 1.5 ft) [ft];
η_{gl} = porosity of gravel layer [unitless];

d_{gl} = depth of gravel layer (min 1 ft) [ft]
f_{design} = design infiltration rate [in/hr]; and
t_{max} = drawdown time (max 48 hrs) [hr].

Table 5-2. Stormwater Runoff Coefficients for Typical Site Elements

Site Element	Stormwater Runoff Coefficient (C_r) (1)	
	Type A and B Soils	Type C and D Soils
Agricultural	0.25 (2)	0.45 (2)
Asphalt/concrete pavement	0.95	0.95
Disturbed soil	0.18	0.25
Forest/undisturbed open space	0.03	0.05
Gravel pavement	0.35	0.35
Managed turf	0.18	0.25
Permeable pavement	(3)	(3)
Roofs	0.95	0.95

TCM 1 CALCULATION

i	0.82	C	0.63
P_6	0.33 In.	P_0	0.41 In.
DMA_{Area}	1,658,000 Sq Ft.	SDV	56,019 Cu. Ft.
$DMA_{impervious}$	1,363,080 Sq Ft.	$Bot\ Pond_{Area}$	18,989 Sq. Ft.
$DMA_{pervious}$	294,920 Sq Ft.		
d_{pz}	2.00 Ft.		
n_{pm}	0.40		
d_{pm}	1.50 Ft.		
n_{gl}	0.35		
d_{gl}	1.00 Ft.		
a	1.963		

TCM 2 CALCULATION

i	0.92	C	0.76
P_6	0.33 In.	P_0	0.49 In.
DMA_{Area}	1,599,400 Sq Ft.	SDV	65,680 Cu. Ft.
$DMA_{impervious}$	1,472,200 Sq Ft.	$Bot\ Pond_{Area}$	14,760 Sq. Ft.
$DMA_{pervious}$	127,200 Sq Ft.		
d_{pz}	3.50 Ft.		
n_{pm}	0.40		
d_{pm}	1.50 Ft.		
n_{gl}	0.35		
d_{gl}	1.00 Ft.		
a	1.963		

TCM 3 CALCULATION

i	0.90	C	0.73
P_6	0.33 In.	P_0	0.47 In.
DMA_{Area}	486,800 Sq Ft.	SDV	19,252 Cu. Ft.
$DMA_{impervious}$	438,900 Sq Ft.	$Bot\ Pond_{Area}$	4,326 Sq. Ft.
$DMA_{pervious}$	47,900 Sq Ft.		
d_{pz}	3.50 Ft.		
n_{pm}	0.40		
d_{pm}	1.50 Ft.		
n_{gl}	0.35		
d_{gl}	1.00 Ft.		
a	1.963		

TCM 4 CALCULATION

i	0.66	C	0.46
P_6	0.33 In.	P_0	0.30 In.
DMA_{Area}	121,890 Sq Ft.	SDV	3,012 Cu. Ft.
$DMA_{impervious}$	80,450 Sq Ft.	$Bot\ Pond_{Area}$	2,077 Sq. Ft.
$DMA_{pervious}$	41,440 Sq Ft.		
d_{pz}	0.50 Ft.		
n_{pm}	0.40		
d_{pm}	1.50 Ft.		
n_{gl}	0.35		
d_{gl}	1.00 Ft.		
a	1.963		

TCM 5 CALCULATION

i	0.66	C	0.46
P_6	0.33 In.	P_0	0.30 In.
DMA_{Area}	83,750 Sq Ft.	SDV	2,061 Cu. Ft.
$DMA_{impervious}$	55,100 Sq Ft.	$Bot\ Pond_{Area}$	1,422 Sq. Ft.
$DMA_{pervious}$	28,650 Sq Ft.		
d_{pz}	0.50 Ft.		
n_{pm}	0.40		
d_{pm}	1.50 Ft.		
n_{gl}	0.35		
d_{gl}	1.00 Ft.		
a	1.963		

TCM 6 CALCULATION

i	0.52	C	0.35
P_6	0.33 In.	P_0	0.23 In.
DMA_{Area}	10,700 Sq Ft.	SDV	205 Cu. Ft.
$DMA_{impervious}$	5,600 Sq Ft.	$Bot\ Pond_{Area}$	84 Sq. Ft.
$DMA_{pervious}$	5,100 Sq Ft.		
d_{pz}	1.50 Ft.		
n_{pm}	0.40		
d_{pm}	1.50 Ft.		
n_{gl}	0.35		
d_{gl}	1.00 Ft.		
a	1.963		

TCM 7 CALCULATION

i	0.76	C	0.56
P_6	0.33 In.	P_0	0.36 In.
DMA_{Area}	157,800 Sq Ft.	SDV	4,732 Cu. Ft.
$DMA_{impervious}$	120,100 Sq Ft.	$Bot\ Pond_{Area}$	3,264 Sq. Ft.
$DMA_{pervious}$	37,700 Sq Ft.		
d_{pz}	0.50 Ft.		
n_{pm}	0.40		
d_{pm}	1.50 Ft.		
n_{gl}	0.35		
d_{gl}	1.00 Ft.		
a	1.963		

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

STORMWATER MANAGEMENT PLAN (SHEET 3 OF 5)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2023	PLANNING SUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C5.2
Sheet 15 of 17

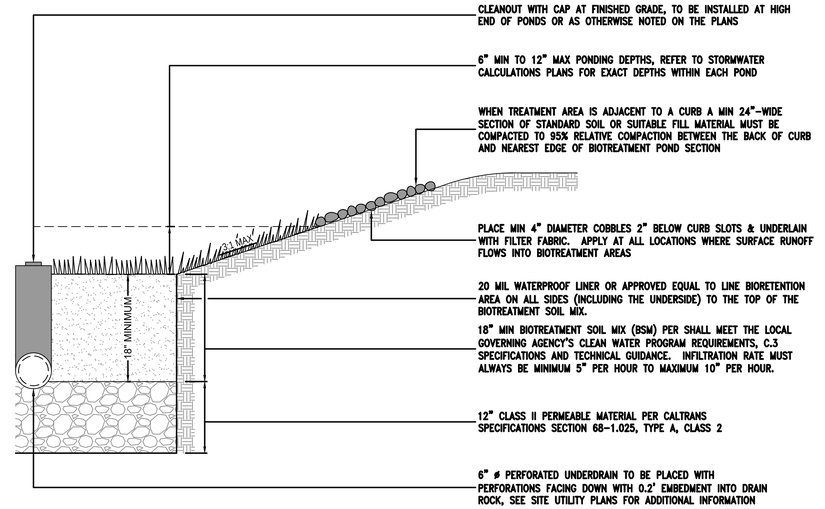
THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB, AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg 11/2/2022 2:01 PM RAMBROSE 1:1

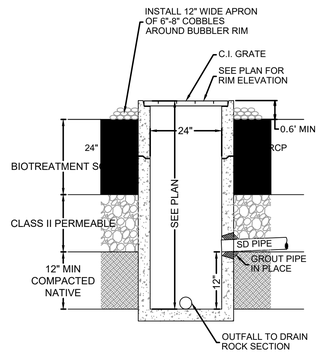
\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg, 8/2/2024 12:42:17 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT

DETAIL 1 - TYPICAL BIORETENTION AREA HALF-SECTION



DETAIL 2 - BUBBLE-UP STRUCTURE



WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

STORMWATER MANAGEMENT PLAN (SHEET 4 OF 5)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	06.02.2023	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C5.3
Sheet 16 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK.

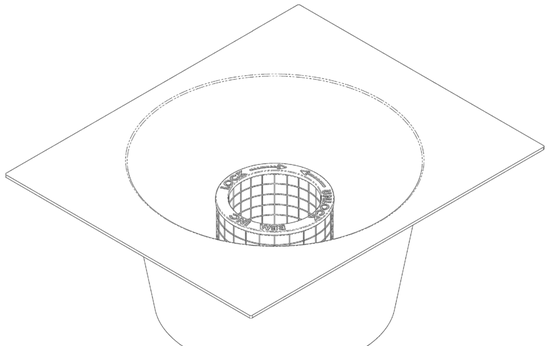
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg 11/2/2022 2:01 PM RAMBROSE 1:1

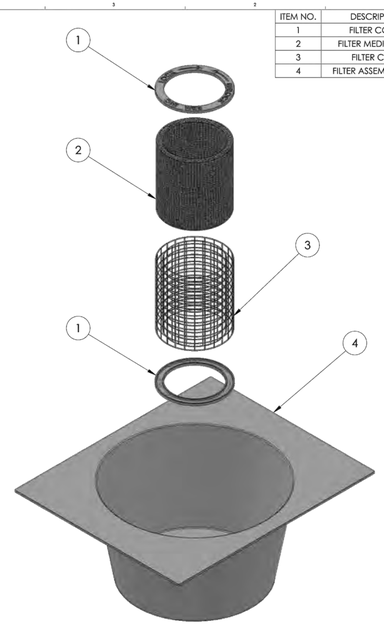
\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg, 8/2/2024 12:42:23 PM, _DWG To PDF.pc3

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT

1. All dimensions are in inches, unless otherwise noted.
2. The TRITON - TR Series Drop Inlet Filters can be sized to fit most industry standard catch basins. REM also designs custom filters for unique storm water infrastructures and applications.
3. Filter bodies are constructed using non-reactive high density polyethylene plastic (HDPE) with added U.V. inhibitors.
4. Filter cartridge housings are constructed utilizing Type 304 Stainless Steel, with 2" welded square openings.
5. Removable cartridge tops are constructed utilizing over 40% recycled Non-reactive High Density Polystyrene Plastic with added U.V. inhibitors.
6. REM TRITON replacement Filter Media Packs are charged with REM FOG media an expanded volcanic ash medium treated to be highly hydrophobic housed in a durable geo-textile perforated polypropylene woven fabric. REM FOG media effectively encapsulates liquefied petroleum hydrocarbons (Fats, Oils & Grease including animal fats). The media's hydrophobic characteristic allows for greater polishing of flow resulting in the reduction of Total Suspended Solids (TSS). Suspended solid reduction includes but is not limited to debris, trash, silt,sediment and agglomerated heavy metals. (Additional media options are available including mixed blends of granulated carbon (AC) and Zeolite [ZEO]). For trash/debris capturing only, Bioflex Media (BFTG) should be chosen.
7. REM TRITON filter cartridges are removable for ease of cleaning and maintenance.
8. The TRITON filter design requires water flows to filter through media, preventing low flow bypass.
9. Filter designs include a high flow overflow bypass to eliminate pooling or flooding during heavy rain events.
10. See REM Specifier Sheets for size, model and flow rate information.
11. REM TRITON filters shall be installed and maintained in accordance with manufacturer recommendations.
12. Maintenance information and replacement REM Media Packs are available upon request by contacting REM at sales@remfilters.com or (888) 526-4736.
13. U.S. Patent Number: 6,217,757 B1
14. Made in the USA.



ITEM NO.	DESCRIPTION	QTY.
1	FILTER COVER	2
2	FILTER MEDIA PACK	1
3	FILTER CAGE	1
4	FILTER ASSEMBLY BASE	1



				MASS:	SHT:
			DRAWN:	A.C.	3/30/21
			CHCKED:		
			ENG APR:		
			MFG APR:		
			QA:		
			COMMENTS:		

PROPRIETARY AND CONFIDENTIAL
THE INFORMATION CONTAINED IN THE DRAWING IS THE SOLE PROPERTY OF REM. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF REM IS PROHIBITED. COPYRIGHT ©2021 REM, INC. ALL RIGHTS RESERVED.

NEXT ASSY	USED ON
APPLICATION	

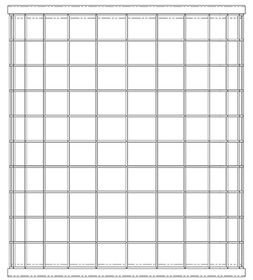
Rand Environmental Manufacturing Inc.
Patented Filtration Solutions for Pollution Control
REM
MANUFACTURING
4000 Enterprise Drive
Newburgh, IN 47630
T: 812.853.8000
F: 812.853.8001
ENGINEERING
2900 Bristol Circle
Oakville, ON L6H 5S9
T: 905.829.8000
F: 905.829.8001

TITLE: DROP INLET FILTER

SIZE	DWG. NO.	REV
D	01-005	A

SCALE: 1:4 WEIGHT: SHEET 1 OF 4





SPECIFIER CHART TRITON DROP INLET FILTERS	INLET INSIDE DIMENSION (ID) Of Catch Basin:
MODEL:	(Inch x Inch)
TR12RD Configured with:	
Cartridge: TR7-CART (4") § (Standard)	12" Dia. RD
Cartridge: TR7-CART (8")	
Cartridge: TR7-CART (16")	
TR12X12 Configured with:	
Cartridge: TR7-CART (4) § (Standard)	12" X 12"
Cartridge: TR7-CART (8)	
Cartridge: TR7-CART (16)	
TR16RD Configured with:	
Cartridge: TR7-CART (4) (Shallow)	16" Dia. RD
Cartridge: TR7-CART (8) § (Standard)	
Cartridge: TR7-CART (16) (Deep)	
TR16X16 Configured with:	
Cartridge: TR7-CART (4)	16" X 16"
Cartridge: TR7-CART (8) § (Standard)	
Cartridge: TR7-CART (16)	
TR18RD Configured with:	
Cartridge: TR10-CART (4)	18" Dia. RD
Cartridge: TR10-CART (8) § (Standard)	
Cartridge: TR10-CART (16)	
TR18X18 Configured with:	
Cartridge: TR10-CART (4)	18" X 18"
Cartridge: TR10-CART (8) § (Standard)	
Cartridge: TR10-CART (16)	
TR18X24 Configured with:	
Cartridge: TR10-CART (8) § (Standard)	18" X 24"
Cartridge: TR10-CART (16)	
Cartridge: TR10-CART (32)	
TR24X24 Configured with:	
Cartridge: TR10-CART (8) § (Standard)	20" X 24"
Cartridge: TR10-CART (16)	
Cartridge: TR10-CART (32)	
TR24X36 Configured with:	
Cartridge: TR14-CART (8) § (Standard)	24" X 24"
Cartridge: TR14-CART (16)	
Cartridge: TR14-CART (32)	
TR24RD Configured with:	
Cartridge: TR14-CART (8) § (Standard)	24" Dia. RD
Cartridge: TR14-CART (16)	
Cartridge: TR14-CART (32)	
TR24X36 Configured with:	
Cartridge: TR10-CART (8) (Qty 2) § (Standard)	24" X 36"
Cartridge: TR10-CART (16) (Qty 2)	
Cartridge: TR10-CART (32) (Qty 2)	
TR30RD Configured with:	
Cartridge: TR14-CART (8)	30" Dia. RD
Cartridge: TR14-CART (16) § (Standard)	
Cartridge: TR14-CART (32)	
TR30X30 Configured with:	
Cartridge: TR14-CART (8)	30" X 30"
Cartridge: TR14-CART (16) § (Standard)	
Cartridge: TR14-CART (32)	
TR24X48 Configured with:	
Cartridge: TR14-CART (8) (Qty 2) § (Standard)	24" X 48"
Cartridge: TR14-CART (16) (Qty 2)	
Cartridge: TR14-CART (32) (Qty 2)	
TR36X36 Configured with:	
Cartridge: TR14-CART (8)	36" X 36"
Cartridge: TR14-CART (16) § (Standard)	
Cartridge: TR14-CART (32)	
TR36RD Configured with:	
Cartridge: TR14-CART (8)	36" Dia. RD
Cartridge: TR14-CART (16) § (Standard)	
Cartridge: TR14-CART (32)	
TR42RD Configured with:	
Cartridge: TR14-CART (8)	42" Dia. RD
Cartridge: TR14-CART (16) § (Standard)	
Cartridge: TR14-CART (32)	
TR48RD Configured with:	
Cartridge: TR26-CART (8)	48" X 48"
Cartridge: TR26-CART (17) § (Standard)	
Cartridge: TR26-CART (34)	
TR48RD Configured with:	
Cartridge: TR24-CART (8)	48" Dia. RD
Cartridge: TR24-CART (17) § (Standard)	
Cartridge: TR24-CART (34)	



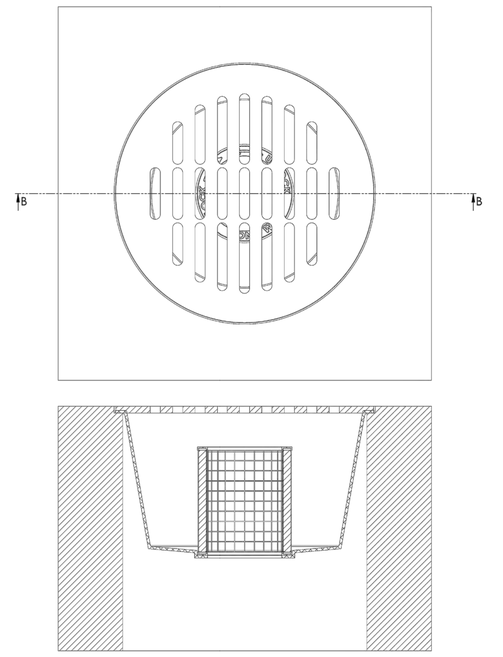
				MASS:	SHT:
			DRAWN:	A.C.	3/30/21
			CHCKED:		
			ENG APR:		
			MFG APR:		
			QA:		
			COMMENTS:		

Rand Environmental Manufacturing Inc.
Patented Filtration Solutions for Pollution Control
REM
MANUFACTURING
4000 Enterprise Drive
Newburgh, IN 47630
T: 812.853.8000
F: 812.853.8001
ENGINEERING
2900 Bristol Circle
Oakville, ON L6H 5S9
T: 905.829.8000
F: 905.829.8001

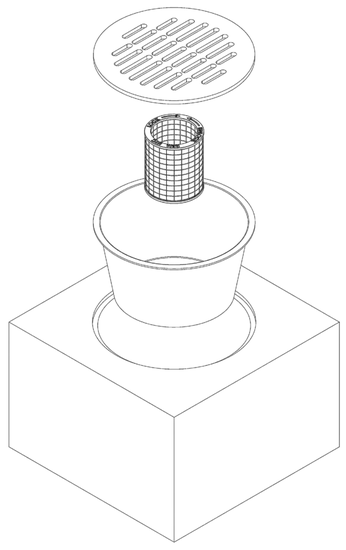
TITLE: DROP INLET FILTER

SIZE	DWG. NO.	REV
D	01-005	A

SCALE: 1:2 WEIGHT: SHEET 2 OF 4



SECTION B-B



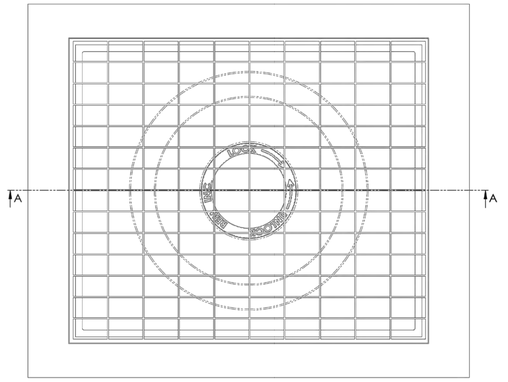
				MASS:	SHT:
			DRAWN:	A.C.	3/30/21
			CHCKED:		
			ENG APR:		
			MFG APR:		
			QA:		
			COMMENTS:		

Rand Environmental Manufacturing Inc.
Patented Filtration Solutions for Pollution Control
REM
MANUFACTURING
4000 Enterprise Drive
Newburgh, IN 47630
T: 812.853.8000
F: 812.853.8001
ENGINEERING
2900 Bristol Circle
Oakville, ON L6H 5S9
T: 905.829.8000
F: 905.829.8001

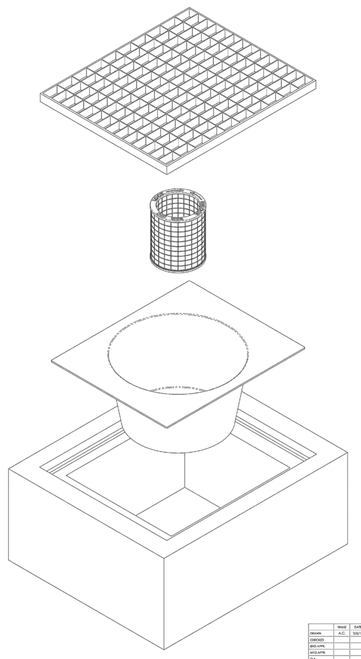
TITLE: DROP INLET FILTER

SIZE	DWG. NO.	REV
D	01-005	A

SCALE: 1:5 WEIGHT: SHEET 3 OF 4



SECTION A-A



				MASS:	SHT:
			DRAWN:	A.C.	3/30/21
			CHCKED:		
			ENG APR:		
			MFG APR:		
			QA:		
			COMMENTS:		

Rand Environmental Manufacturing Inc.
Patented Filtration Solutions for Pollution Control
REM
MANUFACTURING
4000 Enterprise Drive
Newburgh, IN 47630
T: 812.853.8000
F: 812.853.8001
ENGINEERING
2900 Bristol Circle
Oakville, ON L6H 5S9
T: 905.829.8000
F: 905.829.8001

TITLE: DROP INLET FILTER

SIZE	DWG. NO.	REV
D	01-005	A

SCALE: 1:3 WEIGHT: SHEET 4 OF 4

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM
COSTCO WHOLESALE
TRACY, CALIFORNIA

STORMWATER MANAGEMENT PLAN (SHEET 5 OF 5)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL
	08.02.2024	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	08/02/24

SHEET
C5.4
Sheet 17 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK
NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg 11/2/2022 2:01 PM RAMBROSE 1:1

\\Wma-arch.com\wm\SNR\22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C5.0_Stormwater Management Plan.dwg, 8/2/2024 12:42:28 PM, _DWG To PDF.pc3

APPENDIX B

2017 Kittelson Transportation Impact Analysis

KITTELSON & ASSOCIATES
610 SW ALDER STREET, SUITE 700
PORTLAND, OR 97205
P 503.228.5230 F 503.273.8169

MEMORANDUM

Date: August 28, 2017 Project #: 20847

To: Al Gali, Robert Armijo, Cris Mina; City of Tracy
Alex Chetley, Firoz Vohra; San Joaquin County

CC: Peter Kahn, Costco

From: Kelly Laustsen and Julia Kuhn

Project: Tracy Costco Depot

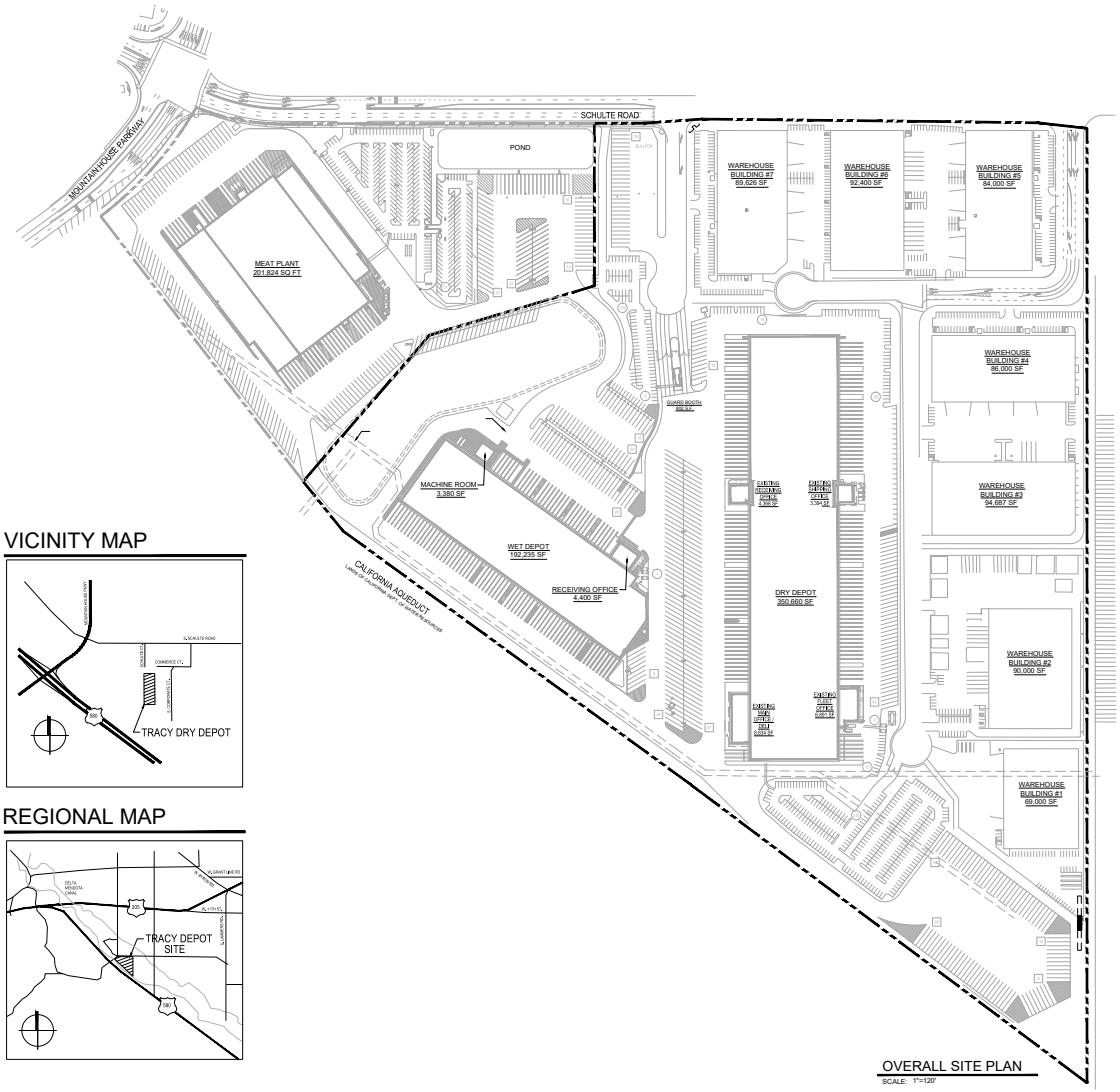
Subject: Transportation Impact Analysis

This memorandum presents a Transportation Impact Analysis (TIA) for the proposed site modifications at the Costco Depot site in San Joaquin County. The existing Depot is located south of W Schulte Road and east of Mountain House Parkway. This memorandum describes the proposed site modifications, the anticipated change in site trip generation, and the transportation-related impacts with the proposed modifications to both site access and on-site uses. This study concludes that the proposed site modifications can be completed while maintaining acceptable traffic operations and safety at the study intersections.

PROJECT BACKGROUND

The Costco Tracy Depot currently includes ten buildings that house a wet depot, a dry depot, a meat plant and variety of industrial uses. These ten buildings on-site today total1,382,059 square feet. Primary access for freight trucks and employees occurs via both S Schulte Court and Gateway Boulevard. Employee access is also provided by two accesses on W Schulte Road that are located between S Schulte Court and Mountain House Parkway. Figure 1 shows the existing site plan and indicates the access locations.

As proposed, the dry depot and meat plant will remain in-place and the wet depot will be expanded. In addition, a new E-Commerce building will be constructed, which will replace the current E-Commerce facility northeast on Schulte Road at 25149 S Schulte Road. Seven of the ten buildings on-site will be demolished to make room for the site modifications. These changes result in a net *reduction* of over 220,000 square feet in building space. Figure 2 shows a conceptual site plan with the proposed changes.



VICINITY MAP

REGIONAL MAP

OVERALL SITE PLAN
SCALE: 1"=120'

PROJECT DATA

CLIENT:	COSTCO WHOLESALE 999 LAKE DRIVE ISSAQUAH, WA 98027
PROJECT ADDRESS:	25862 S. SCHULTE COURT TRACY, CA 95377

SITE DATA

TOTAL SITE AREA:	5,081,902 SQ. FT / 117 ACRES
INCLUDES:	
DEPOT SITE AREA:	4,105,721 SQ. FT / 94 ACRES
MEAT PLANT SITE AREA:	976,182 SQ. FT / 22 ACRES
JURISDICTION:	SAN JOAQUIN COUNTY
ZONING:	I-L/S-13A
SETBACKS:	5'-0" FROM STRUCTURES 50'-0" FROM SEPTIC TANKS 100'-0" SEPTIC TANKS 150'-0" FROM SUMPS OR SEEPAGE PITS 10'-0" FROM PROPERTY LINES
BOUNDARIES INFORMATION:	THIS PLAN HAS BEEN PREPARED USING: CIVIL ENGINEERS SURVEY DATED JUNE 2014

BUILDING DATA

INCLUDES:	PROPOSED	EXISTING
EXISTING DRY DEPOT CROSS DOCK AREA	350,660 S.F.	
EXISTING DRY DEPOT OFFICES	23,847 S.F.	
	374,507 S.F.	
WET DEPOT CROSS DOCK AREA	192,235 S.F.	
WET DEPOT RECEIVING OFFICE	4,400 S.F.	
WET DEPOT ENGINE ROOM	3,380 S.F.	
WET DEPOT ADDITION	41,758 S.F.	
	241,773 S.F.	
MEAT PLANT AREA	201,824 S.F.	
NEW GUARD BOOTH	1,082 S.F.	803 S.F.
NEW E-COMMERCE	325,440 S.F.	
NEW E-COMMERCE OFFICE	8,800 S.F.	
FUTURE E-COMMERCE ADDITION	175,440 S.F.	
	509,680 S.F.	

PARKING DATA

INCLUDES:	PROPOSED	EXISTING
SHIPPING DOCK DOORS:		
DRY SHIPPING DOCK DOORS	79 DOORS	79 DOORS
WET SHIPPING DOCK DOORS	79 DOORS	64 DOORS
MEAT PLANT SHIPPING DOCK DOORS	9 DOORS	9 DOORS
E-COMMERCE SHIPPING DOCK DOORS	15 DOORS	N/A
TOTAL SHIPPING DOCK DOORS	**182 DOORS**	
RECEIVING DOCK DOORS:		
DRY RECEIVING DOCK DOORS	78 DOORS	78 DOORS
WET RECEIVING DOCK DOORS	43 DOORS	30 DOORS
MEAT PLANT RECEIVING DOCK DOORS	12 DOORS	12 DOORS
E-COMMERCE RECEIVING DOCK DOORS	10 DOORS	N/A
TOTAL RECEIVING DOCK DOORS	**143 DOORS**	
SITE TRUCK PARKING:		
SITE TRUCK PARKING	731 STALLS	596 STALLS
TRACTOR PARKING	81 STALLS	N/A
EMPLOYEE PARKING:		
DRY DEPOT AND E-COMM EMPLOYEE PARKING	591 STALLS	
MEAT PLANT AND WET DEPOT PARKING	564 STALLS	
TOTAL EMPLOYEE PARKING	1,155 STALLS	801 STALLS

NO. OF STALLS PER 1,000 S.F. OF BUILDING AREA: TBD STALLS

JURISDICTIONAL PARKING REQUIRED: 1/2 STALL PER 1,000 S.F.
1/2 STALL PER EMPLOYEE

NOTES:
EXISTING CONDITIONS TO BE FIELD VERIFIED.

COSTCO DEPOT
TRACY, CALIFORNIA

PRELIMINARY SITE PLAN
OCTOBER 11, 2016

COSTCO WHOLESALE
TRACY, CA
25862 S SCHULTE COURT
TRACY, CA 95377

MG2

91-1340-34
OCTOBER 11, 2016
PRELIMINARY
SITE PLAN

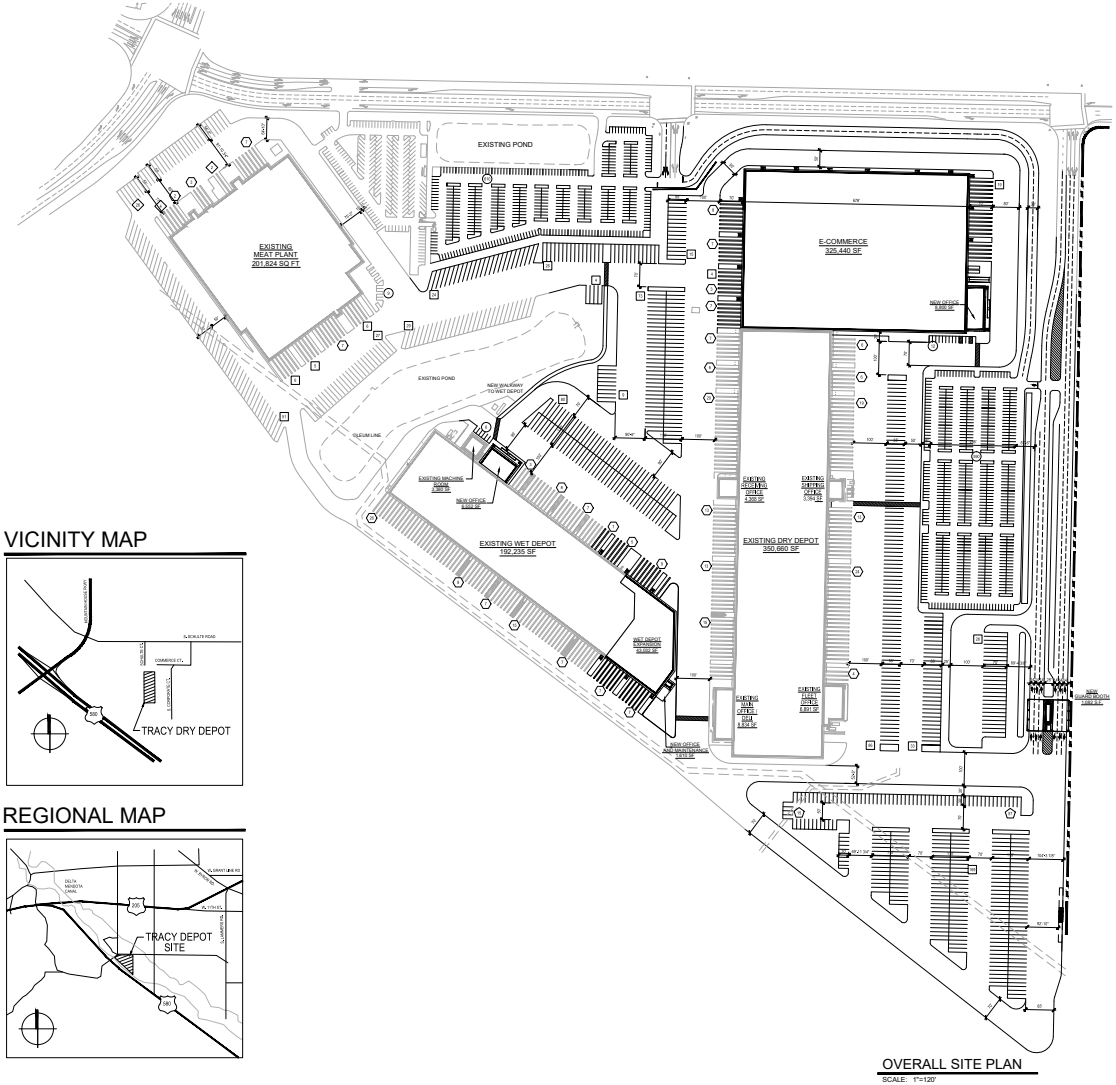
DD11.27

© 2012 The MG2 Group. All rights reserved. No part of this document may be reproduced in any form or by any means without permission in writing from MG2.

Existing Costco Tracy Depot Site Plan
San Joaquin County, California

Figure
1

\\kittelson.com\fs\H_Projects\20\20847 - Tracy Costco Distribution Center\dwgs\figs\Trac Depot figs.dwg Aug 18, 2017 - 11:50am - klaustsen Layout Tab: 1_ex site



OVERALL SITE PLAN
SCALE: 1"=120'

VICINITY MAP

REGIONAL MAP

PROJECT DATA

CLIENT:	COSTCO WHOLESALE 999 LAKE DRIVE ISSAQUAH, WA 98027
PROJECT ADDRESS:	25862 S. SCHULTE COURT TRACY, CA 95377

SITE DATA

TOTAL SITE AREA:	5,081,902 SQ. FT / 117 ACRES
INCLUDES:	
DEPOT SITE AREA: MEAT PLANT SITE AREA:	4,105,721 SQ. FT / 94 ACRES 976,182 SQ. FT / 22 ACRES
JURISDICTION:	SAN JOAQUIN COUNTY
ZONING:	I-L/S-13A
SETBACKS:	5'-0" FROM STRUCTURES 50'-0" FROM SEPTIC TANKS 100'-0" SEPTIC TANKS 150'-0" FROM SUMPS OR SEEPAGE PITS 10'-0" FROM PROPERTY LINES
BOUNDARIES INFORMATION:	THIS PLAN HAS BEEN PREPARED USING: CIVIL ENGINEERS SURVEY DATED JUNE 2014

BUILDING DATA

INCLUDES:	PROPOSED
EXISTING DRY DEPOT CROSS DOCK AREA	350,660 S.F.
EXISTING DRY DEPOT OFFICES	23,847 S.F.
	374,507 S.F.
WET DEPOT CROSS DOCK AREA	192,235 S.F.
WET DEPOT ENGINE ROOM	3,380 S.F.
WET DEPOT RECEIVING OFFICE	**6,552 S.F.**
WET DEPOT CROSS DOCK ADDITION	**43,032 S.F.**
	245,199 S.F.
MEAT PLANT AREA	201,824 S.F.
NEW GUARD BOOTH	**1,082 S.F.**
NEW E-COMMERCE	**325,440 S.F.**
NEW E-COMMERCE OFFICE	**8,800 S.F.**
FUTURE E-COMMERCE ADDITION	**175,440 S.F.**
	509,680 S.F.

PARKING DATA

INCLUDES:	PROPOSED	EXISTING
SHIPPING DOCK DOORS:		
DRY SHIPPING DOCK DOORS	79 DOORS	79 DOORS
WET SHIPPING DOCK DOORS	77 DOORS	63 DOORS
MEAT PLANT SHIPPING DOCK DOORS	9 DOORS	9 DOORS
E-COMMERCE SHIPPING DOCK DOORS	16 DOORS	N/A
TOTAL SHIPPING DOCK DOORS	**181 DOORS**	
RECEIVING DOCK DOORS:		
DRY RECEIVING DOCK DOORS	78 DOORS	78 DOORS
WET RECEIVING DOCK DOORS	39 DOORS	31 DOORS
MEAT PLANT RECEIVING DOCK DOORS	12 DOORS	12 DOORS
E-COMMERCE RECEIVING DOCK DOORS	10 DOORS	N/A
TOTAL RECEIVING DOCK DOORS	**139 DOORS**	
SITE TRUCK PARKING:		
SITE TRUCK PARKING	701 STALLS	596 STALLS
TRACTOR PARKING	72 STALLS	N/A
EMPLOYEE PARKING:		
DRY DEPOT AND E-COMM EMPLOYEE PARKING	598 STALLS	
MEAT PLANT AND WET DEPOT PARKING	626 STALLS	
TOTAL EMPLOYEE PARKING	1,224 STALLS	801 STALLS

NO. OF STALLS PER 1,000 S.F. OF BUILDING AREA: TBD STALLS

JURISDICTIONAL PARKING REQUIRED: 1/2 STALL PER 1,000 S.F.
1/2 STALL PER EMPLOYEE

NOTES:
EXISTING CONDITIONS TO BE FIELD VERIFIED.

0 30 60 120 240
1" = 60'-0"

COSTCO WHOLESALE
TRACY, CA

25862 S SCHULTE COURT
TRACY, CA 95377

MG2

91-1340-35
MARCH 24, 2017
PRELIMINARY
SITE PLAN

DD11.35

© MG2 Inc. All rights reserved. No part of this document may be reproduced in any form or by any means without permission in writing from MG2.

COSTCO DEPOT

TRACY, CALIFORNIA

PRELIMINARY SITE PLAN

MARCH 24, 2017

Proposed Costco Tracy Depot Conceptual Site Plan
San Joaquin County, California

Figure
2

\\kittelson.com\fs\H_Projects\20\20847 - Tracy Costco Distribution Center\dwgs\figs\Trac Depot figs.dwg Aug 18, 2017 - 11:50am - klaustsen Layout Tab: 2_prop site

STUDY SCOPE & ANALYSIS METHODOLOGY

This section provides an overview of the TIA study scope, study methodology, applicable operating standards, and the report structure.

Study Scope

This analysis identifies the transportation-related impacts associated with the proposed site plan modifications. The study was prepared in accordance with the City of Tracy requirements. The study scope and overall study area for this project were selected based on an analysis of current and future traffic volumes at study intersections and discussions with both City and County staff. The scoping memo provided to the City and County and feedback received are provided in *Appendix A.* The analysis was prepared to address the following transportation issues:

- Existing land use and transportation system conditions within the site vicinity;
- Existing traffic conditions during the weekday AM and PM peak hours;
- Planned developments and transportation improvements in the study area;
- Future year 2018 weekday PM peak hour background traffic conditions (without the site plan modifications);
- Trip generation and distribution estimates for the proposed site plan modifications;
- Future year 2018 weekday AM and PM peak hour total traffic conditions and queuing (with the site plan modifications);
- Discussion of proposed street vacation with the site plan modifications; and
- Finding and recommendations.

Study Intersections

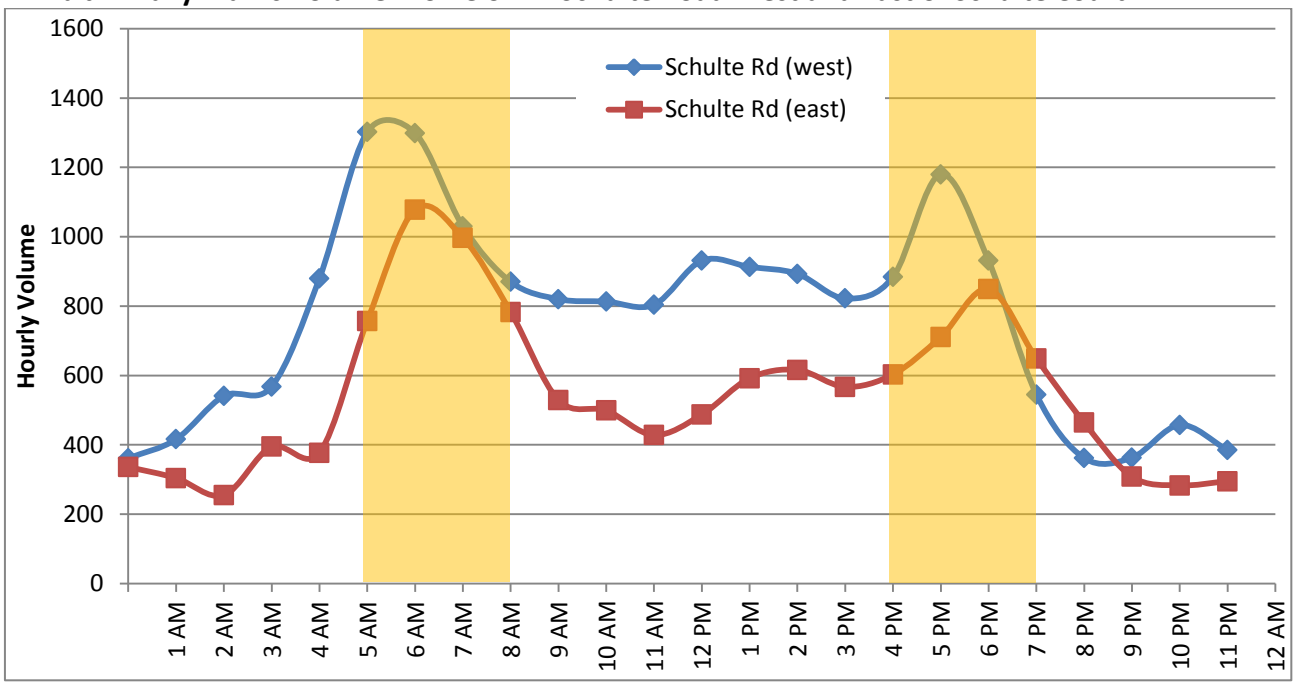
The study intersections were identified in collaboration with City staff. For ease of review, each intersection is referenced within this report using a numerical ID.

1. W Schulte Road/Mountain House Parkway (signalized)
2. W Schulte Road/Western Employee Access #1 (right-in/right-out/left-in)
3. W Schulte Road/Western Employee Access #2 (right-in/right-out)
4. W Schulte Road/Schulte Court – currently serves employees and trucks, but proposed as an employee-only entrance (existing signalized access)
5. W Schulte Road/Gateway Boulevard – currently serves employees and trucks, but proposed as a truck access with guard booth (existing signalized access)

Traffic Analysis Time Periods

Given that the Depot and other businesses within the vicinity have peaking characteristics that are slightly different than typical commuter periods, we collected twenty-four hour tube counts on Schulte Road at two locations along the site frontage to determine the appropriate analysis periods to assess transportation operating conditions. Exhibit 1 provides a summary of the counts over the course of the day.

Exhibit 1. Daily Traffic Volume Profile on W Schulte Road West and East of Schulte Court



As seen in Exhibit 1, the highest hours of traffic on W Schulte Road occur in the early morning (between 5:00 and 8:00 AM), followed by the evening (between 4:00 and 7:00 PM). The height of the morning peak period occurs earlier than "typical" commuter traffic peaks given the plethora of warehouse and distribution facilities in the vicinity of the site and results in traffic volumes that are notably higher than the evening volumes along Schulte Road. As such, study intersection operations were analyzed during the weekday AM and PM peak hours corresponding to approximately 5 – 6 AM and 5 – 6 PM for the following conditions:

- Existing conditions;
- 2018 background conditions (prior to site plan modifications); and
- 2018 total traffic conditions (upon completion of the proposed site plan modifications).

Analysis Methodology

Truck percentages and peak hour factors were developed from the field data. Peak 15-minute flow rates were used for the analysis. All intersections were primarily[1] analyzed using Synchro 9 and the *2010 Highway Capacity Manual* (HCM, Reference 2). In addition, queues are reported from SimTraffic based on an average of five runs.

Performance Measures & Operating Standards

Intersection performance measures reported in this study include level of service (LOS), volume-to-capacity ratio (V/C), and delay. The City of Tracy has established a minimum acceptable LOS of D, where feasible. Per City standards, there are some exceptions where LOS E is acceptable, such as within a quarter mile of a freeway and where construction of improvements is not feasible. The intersection of W Schulte Road/Mountain House Parkway is within a quarter mile of I-580 so the standard is LOS E.

EXISTING CONDITIONS TRAFFIC ANALYSIS

The existing conditions analysis identifies field conditions and the current operational, traffic control, and geometric characteristics of the roadways and other transportation facilities within the study area. These conditions are compared with future opening year conditions later in this report.

Site Conditions and Adjacent Land Uses

The site is generally bordered by W Schulte Road to the north, Interstate 580 to the south and west, and adjacent industrial development to the east. The International Park of Commerce business park is currently being built on the north side of W Schulte Road.

The site is located with San Joaquin County although some of the affected streets, like W Schulte Road are under city jurisdiction. For this reason, the report was prepared consistent with the City's requirements.

[1] The intersection of W Schulte Road/Mountain House Parkway was analyzed using HCM 2000 as Synchro is not able to analyze signals with max green times less than the pedestrian intervals using HCM 2010. The intersection of W Schulte Road/Western Employee Access #1 (right-in/right-out/left-in) was also analyzed using HCM 2000, as Synchro is not able to analyze stop-controlled intersections with four through lanes using HCM 2010. The v/c ratios for signalized intersections are based on the HCM 2000 methodology, as Synchro9 is not able to compute v/c ratios using the HCM 2010 methodology.

Transportation Facilities

This section provides a multi-modal overview of transportation facilities in the site vicinity.

Roadway Facilities

Figure 3 summarizes the existing lane configurations and traffic control devices at the study intersections.

Table 1 summarizes roadways in the site vicinity assessed as part of the traffic impact study.

Table 1 Existing Transportation Facilities

Roadway	Functional Classification[1]	Jurisdictional Authority	Number of Auto Lanes	Posted Speed (mph)	Sidewalks Present?	Bicycle Lanes Present?	On-Street Parking Allowed?
W Schulte Road	Major Collector	City	5	35	Yes	No	No
Mountain House Parkway	Minor Arterial	County	4	45	Partial[2]	No	No
Schulte Court	Local	County	3	Not posted	Yes	No	No
Gateway Boulevard	Local	County	5	Not posted	Yes	No	No

[1] Source: California Road System (CRS) Maps
[2] There are sidewalks at the intersection, but they discontinue just south of the intersection with W Schulte Road

Transit Facilities

There are no transit facilities within the site vicinity.

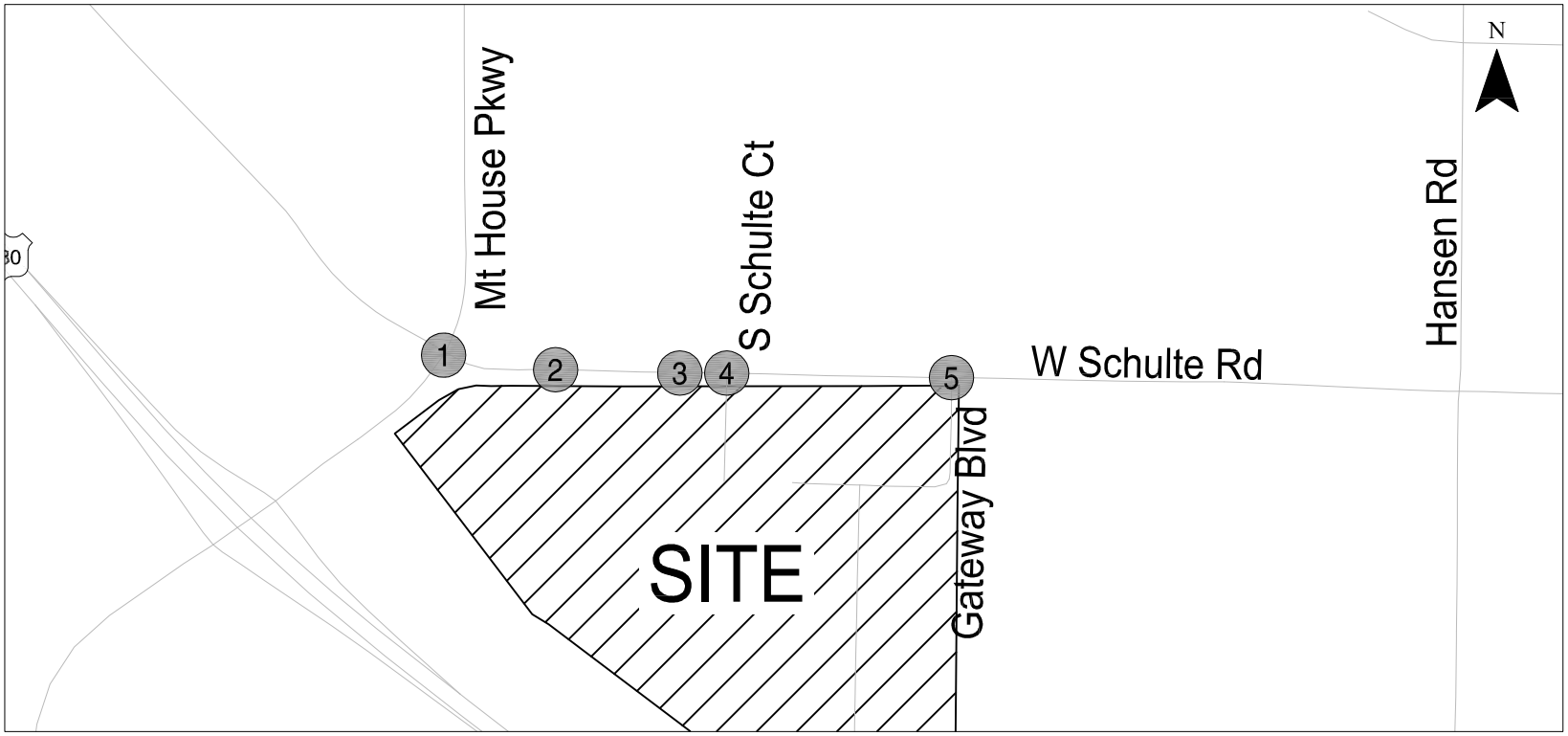
Bicycle and Pedestrian Facilities

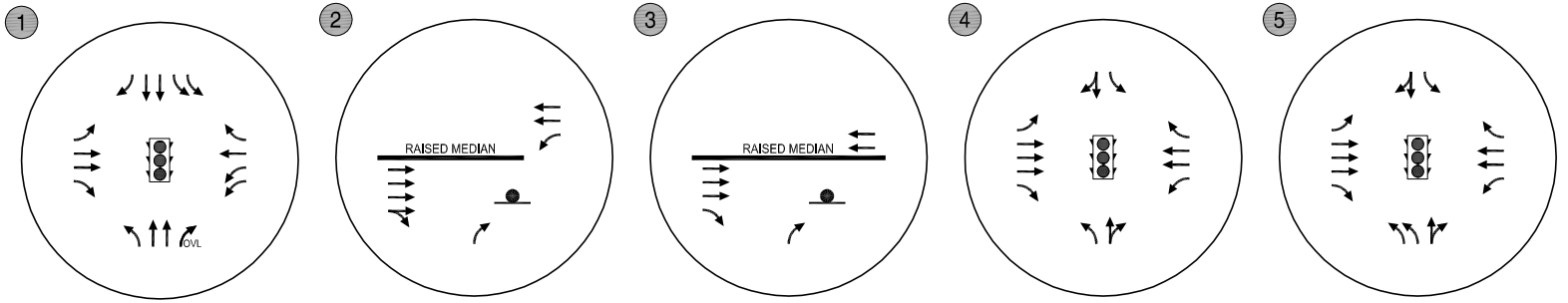
There are no bicycle facilities within the site vicinity. There are sidewalks along the site frontage and on Schulte Court and Gateway Boulevard internal to the site.

Existing Traffic Volumes

Turning movement counts were conducted on a typical mid-week day in early May 2017 during the early morning (between 5:00 and 8:00 AM) and the evening (between 4:00 and 7:00 PM)[2]. The morning peak hour generally occurred between 5:20 and 6:20 AM and the evening peak hour between 5:10 and 6:10 PM. Figure 4 shows the turning movement counts at the study intersections. *Appendix B contains the intersection turning movement count sheets.*

[2] There was construction activity associated with the site on the north side of Schulte Road when counts were taken with a location for construction vehicles to turn on/off the roadway west of Schulte Court. To be conservative, counts were adjusted up to balance along Schulte Road. The construction activity is not expected to have impacted counts to/from the Tracy Costco Depot.





- STOP SIGN
- TRAFFIC SIGNAL
OVL - OVERLAP

Existing Lane Configurations and Traffic Control Devices
San Joaquin County, California

Figure
3

\\kittelson.com\fs\H_Projects\20\20847 - Tracy Costco Distribution Center\dwgs\figs\Trac Depot figs.dwg Aug 18, 2017 - 11:40am - klaustsen Layout Tab: 03_ex LC

Existing Intersection Operations

Operations of the study intersections were assessed using the previously described methodology and were compared to the city's operating standards. As shown in Figure 4, all of the intersections operate acceptably per city standards today. *Appendix C includes the existing conditions intersection operations analysis worksheets*.

TRAFFIC IMPACT ANALYSIS

This section of the report identifies intersection operations anticipated in the horizon year 2018 before and after the proposed site plan modifications. The impact of traffic generated by the site modifications was examined as follows:

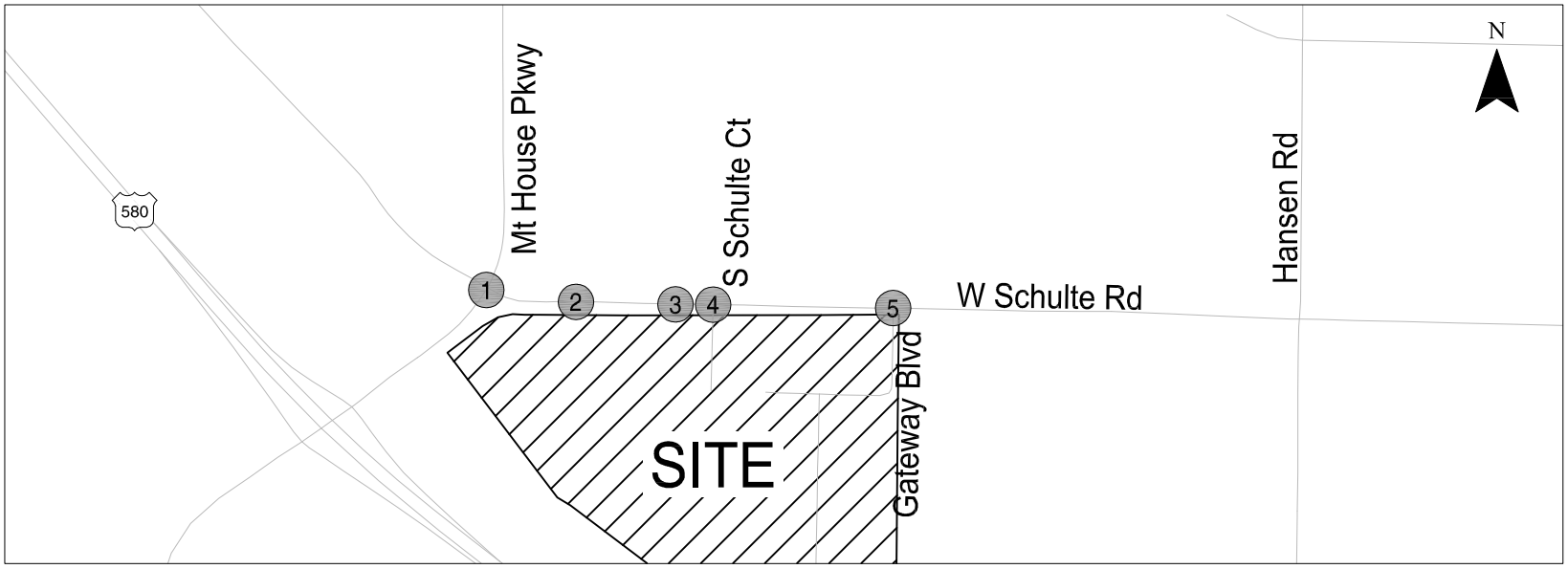
- In-process developments and funded transportation improvements in the site vicinity were identified.
- Year 2018 background traffic volumes (prior to site plan modifications) were developed assuming continued growth.
- Year 2018 background traffic conditions were assessed at each of the study intersections.
- Site-generated trips associated with the site plan modifications were added to the 2018 background traffic conditions to establish the total traffic volumes.
- Intersection improvement needs were identified to mitigate impacts where appropriate.

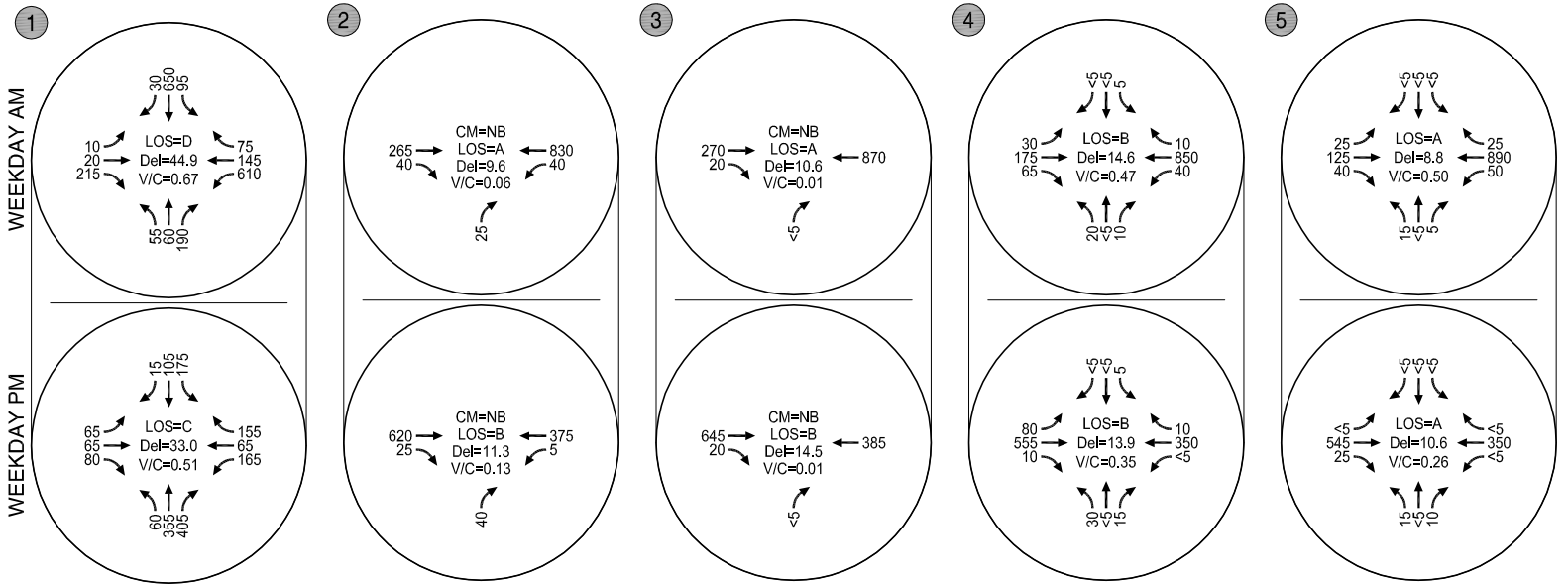
YEAR 2018 BACKGROUND TRAFFIC CONDITIONS

The year 2018 background traffic analysis identifies how the study area's transportation system will operate prior to the proposed site plan modifications. This analysis includes traffic attributed to planned developments within the study area and to general growth in the region, but does not include any rerouting of existing trips based on the proposed changes to the use of the accesses or on-site uses with the proposed modifications.

Planned Developments & Transportation Improvements

Approved in-process developments in the study area were provided by the City and primarily include industrial and commercial uses within the "Cordes Ranch Specific Plan Area" site to the north. A complete list of the in-process developments and the resultant trip generation is provided in *Appendix D.*





CM = CRITICAL MOVEMENT (UNSIGNALIZED)
LOS = CRITICAL MOVEMENT LEVEL OF SERVICE (SIGNALIZED)/CRITICAL MOVEMENT LEVEL OF SERVICE (UNSIGNALIZED)
Del = INTERSECTION AVERAGE CONTROL DELAY (SIGNALIZED)/CRITICAL MOVEMENT CONTROL DELAY (UNSIGNALIZED)
V/C = CRITICAL VOLUME-TO-CAPACITY RATIO

Existing Intersection Operations
Weekday AM and PM Peak Hours
San Joaquin County, California

Figure
4

\\kittelson.com\fs\H_Projects\20\20847 - Tracy Costco Distribution Center\dwgs\figs\Trac Depot figs.dwg Aug 18, 2017 - 11:40am - klaustsen Layout Tab: 4_ex

2018 Future Traffic Volumes & Intersection Operations

Based on direction from the City, a two percent annual growth rate was assumed at the study intersections and applied to traffic not associated with the Costco Depot. This growth rate is expected to be conservative as the City's future travel demand modeling shows traffic on Schulte Road experiencing little to no growth as a result of continued expansion of the City's street grid and provision of alternative routes for traffic in the vicinity.

Figure 6 shows the projected 2018 turning movements at the study intersections and corresponding intersection operations. As shown in the figure, operations at each of the study intersections continue to satisfy the applicable standards under 2018 background conditions. *Appendix E contains the year 2018 background traffic analysis worksheets.*

PROPOSED SITE PLAN MODIFICATIONS

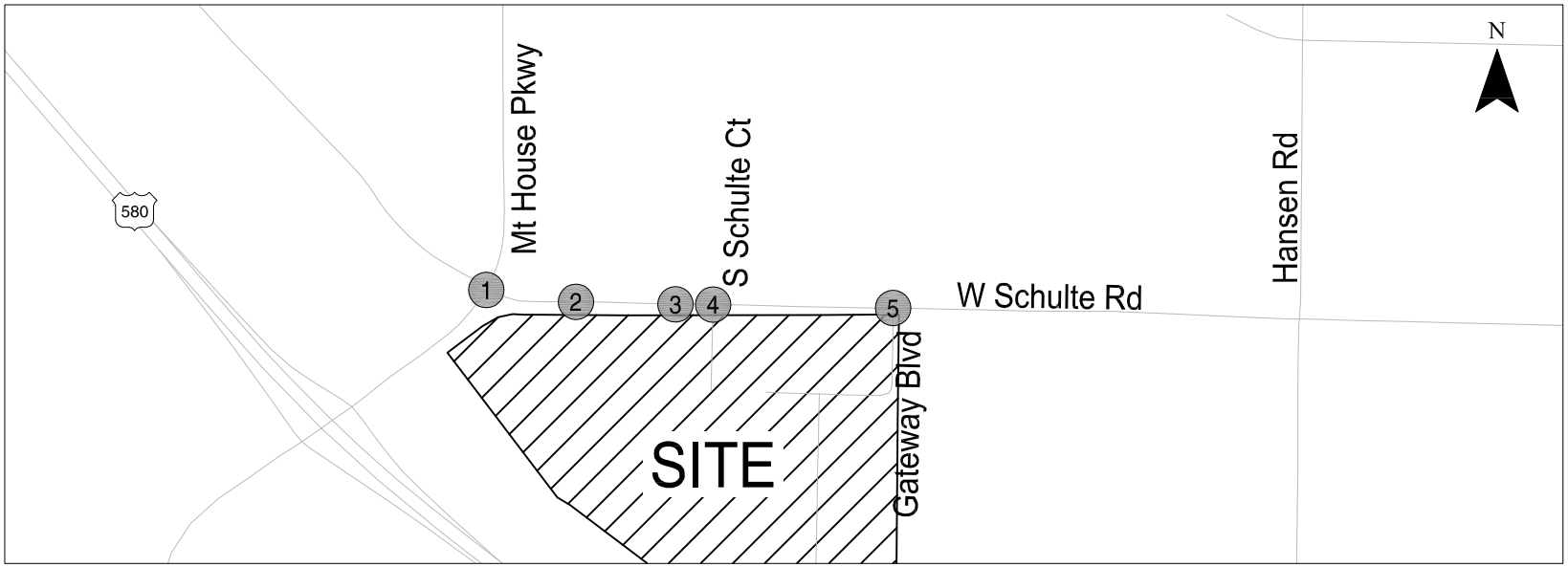
The Costco Tracy Depot is located on the south side of W Schulte Road, with primary access provided for trucks and employees via S Schulte Court and Gateway Boulevard. Employee access is also provided via two limited access points on W Schulte Road that are located between S Schulte Court and Mountain House Parkway. The site currently includes a wet depot, dry depot, meat plan, guard booth, and seven warehouses that house a variety of tenants. Figure 1 shows the existing site plan and indicates the access locations. Table 2 summarizes the current and proposed uses.

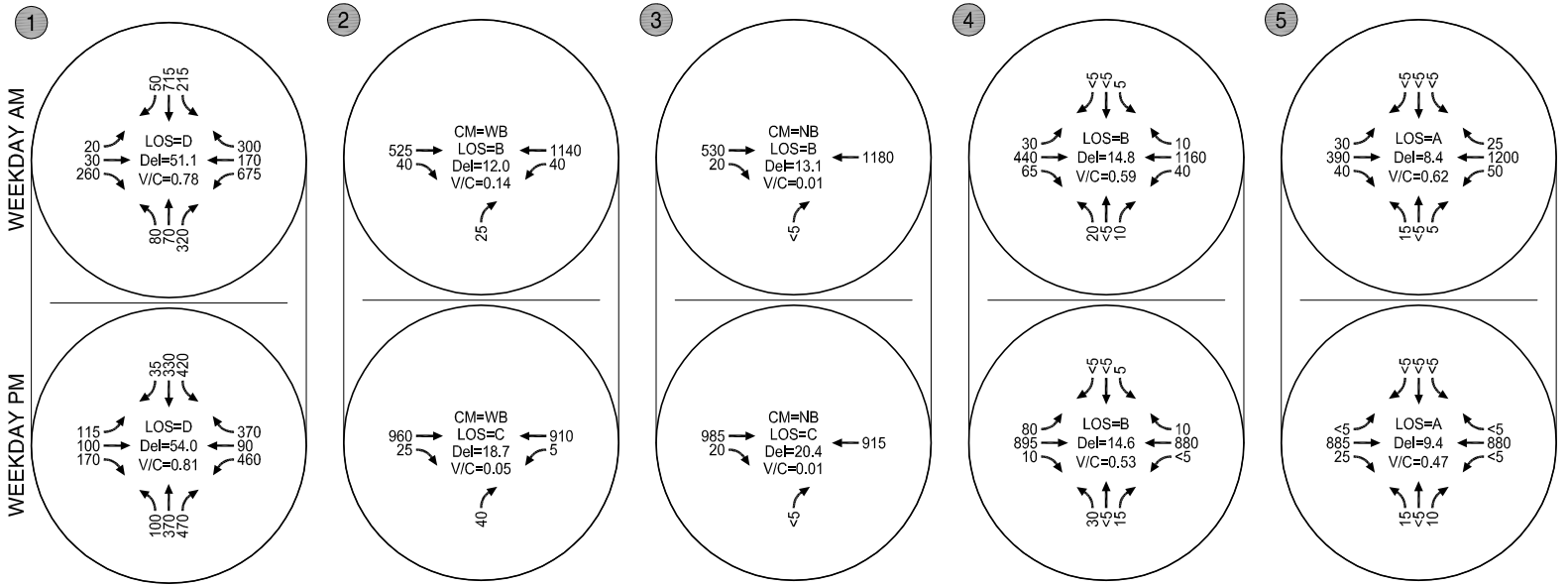
Table 2 Exiting and Proposed Uses

Use	Existing Size (SF)	Proposed Size (SF)	Difference (SF)
Wet Depot	200,015	246,765	+46,750
Dry Depot	374,507	374,507	No change proposed
Meat Plan	201,824	201,824	No change proposed
Warehouse Space	605,713	-	-605,713
E-Commerce	-	334,240	+334,240
Guard Booth	802	1,982	+1,982
Total	**1,382,861**	**1,159,318**	**-223,543**

As shown in Table 2, the proposed site plan modifications result in a net *reduction* of over 220,000 square feet in building space. Figure 2 shows a conceptual site plan with the proposed changes.

As part of the on-site changes, Costco proposes to vacate all existing public streets within the site, including Schulte Court, Corporate Boulevard, and Gateway Boulevard. The layout of these roads and on-site circulation will be modified as shown in Figure 2 to support on-site uses and to separate employee and truck traffic. Trucks will use the Gateway Boulevard access while employees will use the signal at Schulte Court and the western unsignalized locations. With the site modifications, a longer driveway throat will be provided at the Gateway Boulevard access with a guard booth situated approximately 1,500 feet south of Schulte Road.





CM = CRITICAL MOVEMENT (UNSIGNALIZED)
LOS = CRITICAL MOVEMENT LEVEL OF SERVICE (SIGNALIZED)/CRITICAL MOVEMENT LEVEL OF SERVICE (UNSIGNALIZED)
Del = INTERSECTION AVERAGE CONTROL DELAY (SIGNALIZED)/CRITICAL MOVEMENT CONTROL DELAY (UNSIGNALIZED)
V/C = CRITICAL VOLUME-TO-CAPACITY RATIO

Year 2018 Background Intersection Operations
Weekday AM and PM Peak Hours
San Joaquin County, California

Figure
5

\\kittelson.com\fs\H_Projects\20\20847 - Tracy Costco Distribution Center\dwgs\figs\Trac Depot figs.dwg Aug 28, 2017 - 12:15pm - klaustsen Layout Tab: 5_bk

Trip Generation

Table 3 provides the estimated trip generation of the existing site and proposed modifications based on data collected at the site access points, and at the existing Tracy E-Commerce site, which is located west of the Depot at 25149 S Schulte Road. The existing E-Commerce site is leased and will no longer be used with the new E-Commerce building on-site. Data from the existing Depot and E-Commerce sites was used to develop the trip generation rates. Note that the occupied square footage at the existing Depot was used for the trip generation. The table reflects the summation of uses on site; a breakdown of building usage is provided in *Appendix F.* Further details on the trip generation are also provided in *Appendix F* along with the data collected at the existing Tracy E-Commerce site.

Table 3 Trip Generation

Use	Size (SF)	Source	Weekday AM Peak Hour			Weekday PM Peak Hour		
			In	Out	Total	In	Out	Total
Costco Depot and Warehouse Space (Existing)	1,382,059[1]	Traffic Counts	291	68	359	90	119	209
Costco Depot (Proposed)	825,078	Traffic Counts	190	44	234	59	78	136
E-Commerce (Proposed)	334,240	Traffic Counts	72	5	77	3	11	15
Total (Proposed)	**1,159,318**	**-**	**262**	**49**	**311**	**62**	**89**	**151**
Difference (Proposed – Existing)	***-222,741***	**-**	***-29***	***-19***	***-48***	***-28***	***-30***	***-58***

[1] 1,266,206 square feet of the existing warehouse space is occupied and therefore this number was used to develop the trip generation rate to apply to the proposed uses.

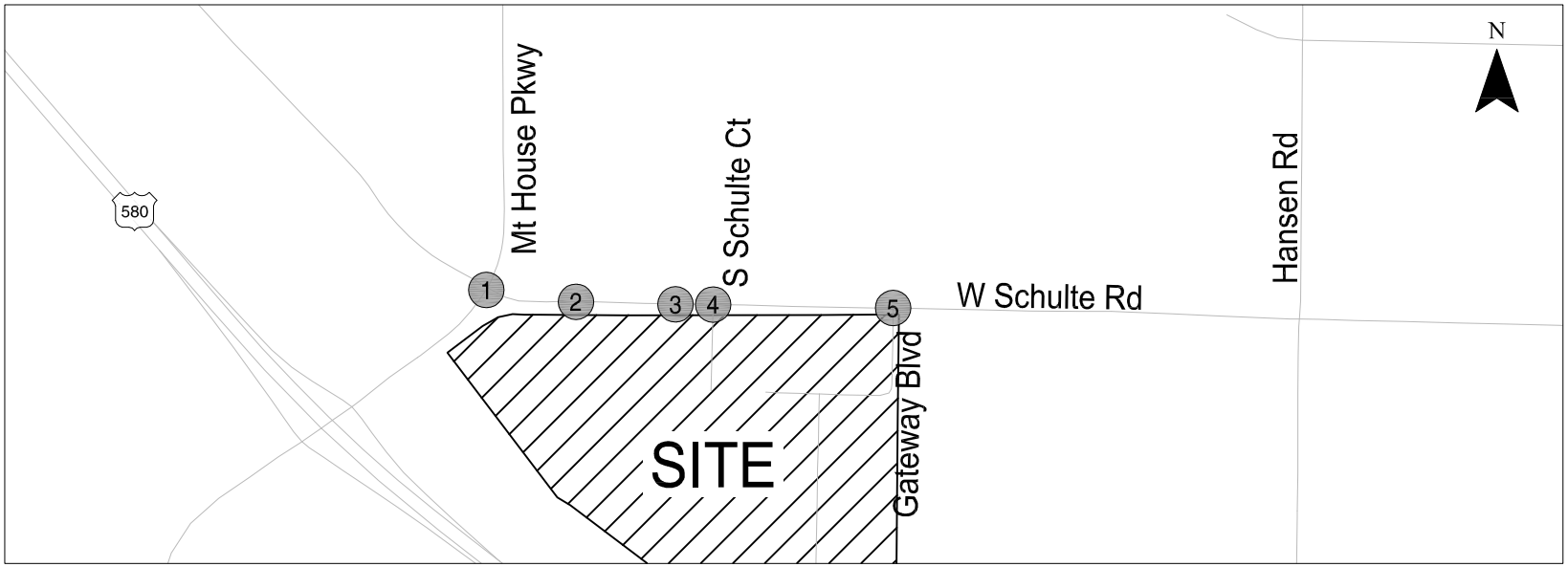
As shown in Table 3, the proposed changes are expected to result in a decrease of site-generated trips during the weekday AM and PM peak periods. Information about employee shift times supporting the trip generation is provided in *Appendix F.*

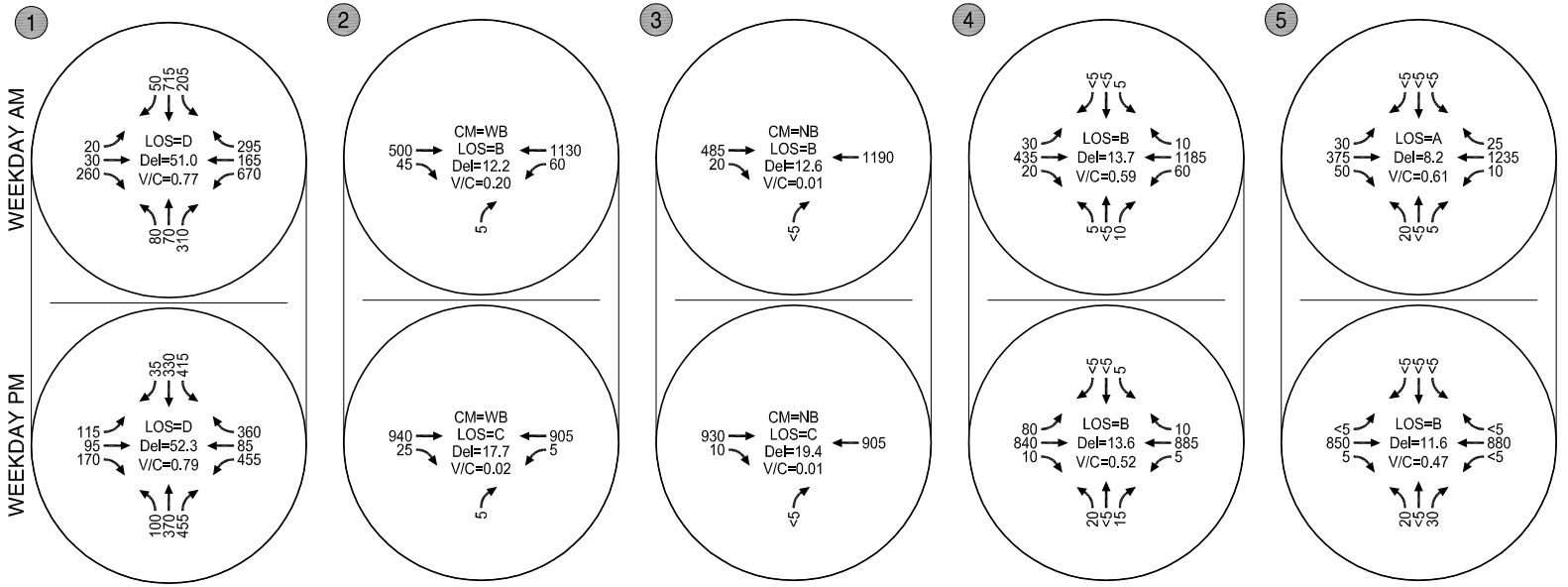
Trip Distribution Pattern

Existing traffic count data at the intersections and site accesses was used to assess existing employee and truck trips to and from the site. The existing trips were modified to reflect the changes in use on site resulting in a reduction of trips and reassignment of employee and truck trips to Schulte Court and Gateway Boulevard.

YEAR 2018 TOTAL TRAFFIC CONDITIONS

The total traffic conditions analysis forecasts how the study intersections will operate with the proposed site plan modifications. The analysis reflects the reduction and re-routing of employee and truck trips to/from the site to account for the proposed changes in the uses and site accesses. Existing truck percentages at the study intersections were modified to account for the rerouting of truck traffic to exclusively use the eastern access at Gateway Boulevard. The total traffic volumes are shown in Figure 6. *Appendix G contains the year 2018 total traffic analysis worksheets.*





CM = CRITICAL MOVEMENT (UNSIGNALIZED)
LOS = CRITICAL MOVEMENT LEVEL OF SERVICE (SIGNALIZED)/CRITICAL MOVEMENT LEVEL OF SERVICE (UNSIGNALIZED)
Del = INTERSECTION AVERAGE CONTROL DELAY (SIGNALIZED)/CRITICAL MOVEMENT CONTROL DELAY (UNSIGNALIZED)
V/C = CRITICAL VOLUME-TO-CAPACITY RATIO

Year 2018 Total Traffic Intersection Operations
Weekday AM and PM Peak Hours
San Joaquin County, California

Figure 6

\\kittelson.com\fs\H_Projects\20\20847 - Tracy Costco Distribution Center\dwgs\figs\Trac Depot figs.dwg Aug 25, 2017 - 12:37pm - klaustsen Layout Tab: 6_TT

As shown in Figure 6, all of the study intersections continue to satisfy the applicable operational standards under total traffic conditions.

Queuing Analysis

SimTraffic was used to forecast 95th percentile queues at the study intersections, shown in Table 4. Note that the queue lengths shown in Table 4 were rounded up to the nearest 15 feet.

Table 4 Summary of 95th Percentile Queues

Intersection	Movement	2018 Background Conditions		2018 Total Traffic Conditions		Available Queue Storage (feet)
		Weekday AM Peak Hour	Weekday PM Peak Hour	Weekday AM Peak Hour	Weekday PM Peak Hour	
101. W Schulte Road/Mountain House Parkway	EB left	50	**150**	50	**150**	100
	EB right	**100**	**100**	**100**	**100**	50
	WB left (1)	**300**	250	**300**	250	270
	WB left (2)	325	250	300	250	360
	WB right	175	300	175	275	350
	NB left	150	**325**	175	**325**	225
	NB right	125	**350**	150	**375**	225
	SB left (1)	275	**375**	275	**375**	275
	SB left (2)	**500**	**450**	**450**	**425**	320
	SB right	**375**	75	**300**	50	275
102. W Schulte Road/Western Employee Access #1	WB left	75	25	75	25	165
	NB right	50	25	25	25	50
103. W Schulte Road/Western Employee Access #2	NB right	25	25	25	25	50
104. W Schulte Road/Schulte Court	EB left	75	100	75	75	375
	EB right	100	25	25	25	700+
	WB left	100	25	75	25	370
	WB right	25	25	25	25	370
	NB left	100	100	25	50	165
	NB through/right	50	75	50	50	165
	SB left	25	25	25	25	100[1]
	SB through/right	25	25	25	25	100[1]
105. W Schulte Road/Gateway Boulevard	EB left	50	25	75	25	370
	EB right	50	25	50	25	370
	WB left	75	25	75	25	360
	WB right	50	25	25	25	300
	NB left (1)	75	50	75	75	1,500+
	NB left (2)	25	50	50	50	1,500+
	NB through/right	25	50	50	50	1,500+
	SB through/right	25	25	25	25	100[1]

Bold red text indicates movements with 95th percentile queues over capacity
EB=Eastbound, WB=Westbound, NB=Northbound, SB=Southbound
[1]Estimated from plans for the intersections of W Schulte Road/Schulte Court and W Schulte Road/Gateway Boulevard

As shown in Table 4, 95th percentile queues at the site accesses can be accommodated within the storage provided. 95th percentile queues for several movements at the intersection of W Schulte Road/Mountain House Parkway are expected to exceed storage under both 2018 background and total traffic conditions. The proposed site plan modifications have a negligible impact on these queues. Therefore, no mitigation measures are proposed.

PROPOSED STREET VACATION

As part of the on-site changes, Costco proposes to vacate all existing public streets within the site, including Schulte Court, Corporate Boulevard, and Gateway Boulevard. The layout of these roads and on-site circulation will be modified as shown in Figure 2 to support on-site uses and to separate employee and truck traffic. Both today and in the future, trucks use Gateway Boulevard access while employees primarily use the signal at Schulte Court and the western unsignalized locations. With the site modifications, a longer driveway throat will be provided at the Gateway Boulevard access with a guard booth situated approximately 1,500 feet south of Schulte Road. As indicated in the "Year 2018 Total Traffic Conditions," the site access locations are proposed to operate at LOS C or better during the weekday AM and PM peak hours with queuing to and from the site contained in the proposed storage.

SUMMARY AND RECOMMENDATIONS

The results of this traffic impact study indicate that the proposed modifications at the Tracy Costco Depot can be accommodated by the surrounding transportation system. The findings and recommendations of this analysis are discussed below.

Findings

- All of the study intersections operate acceptably during the weekday AM and PM peak hour under existing conditions.
- The site plan modifications are expected to reduce the weekday AM and PM peak hour trip generation of the site.
- All of the study intersections are projected to continue to satisfy the applicable operating standards upon completion of the proposed site plan modifications.
- Projected queues can be accommodated at the site accesses.

Recommendations

Based on the traffic analysis, the following recommendations are suggested in conjunction with site development:

- Site landscaping, signing and any aboveground utilities should be appropriately located to ensure that adequate sight distance is maintained after site development.

We trust this study adequately addresses the traffic impacts associated with the proposed changes to the Tracy Costco Depot. Please contact us if you have any questions or comments regarding the contents of this report or the analyses performed.

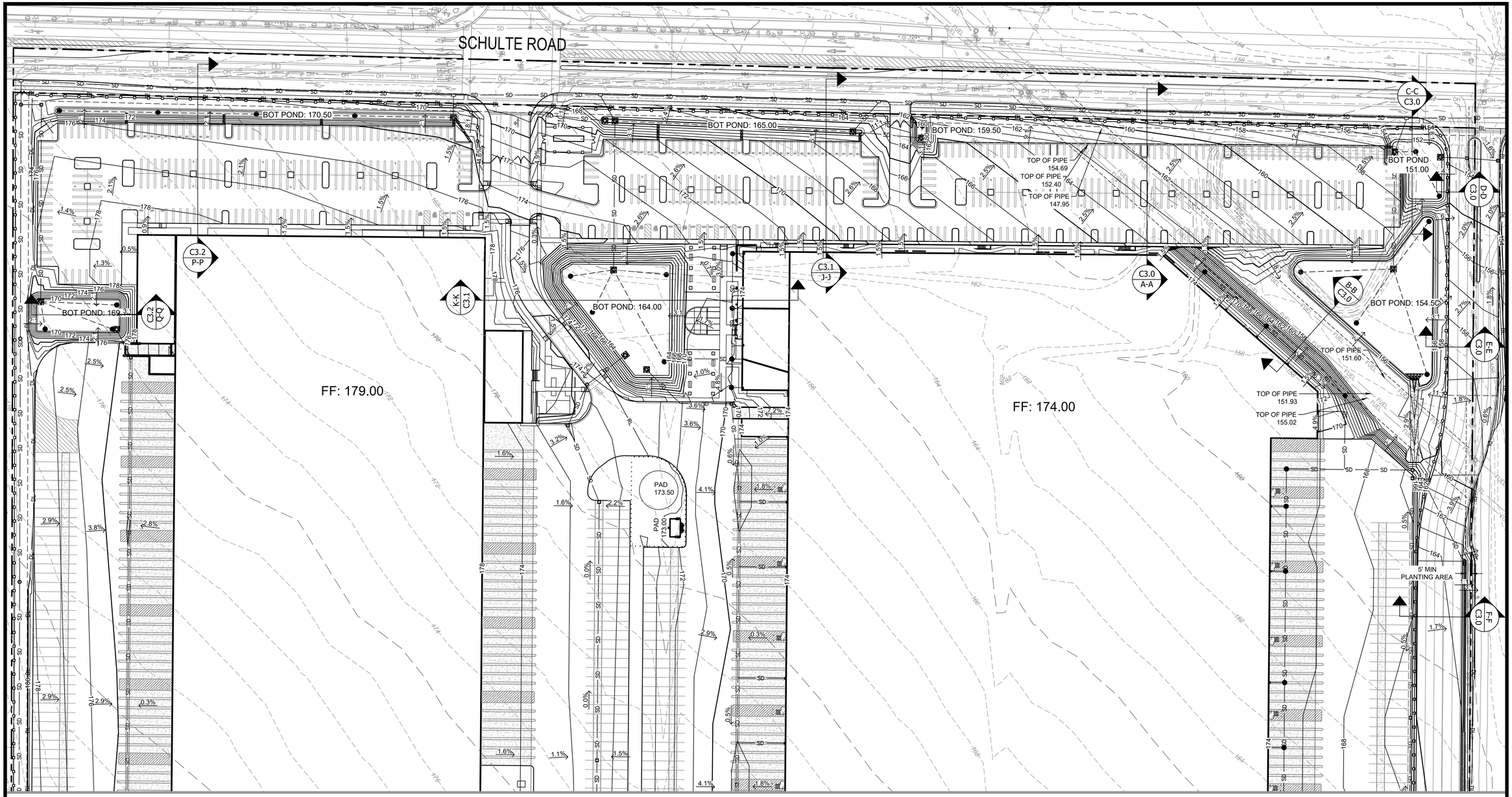
REFERENCES

1. City of Tracy. Transportation Master Plan. November 2012.
2. Transportation Research Board. *2010 Highway Capacity Manual*. 2010.

APPENDIX C

Earthwork Quantities

CAUTION: IF THIS SHEET IS NOT 24"x36" IT IS A REDUCED PRINT



MATCHLINE
SEE SHEET C2.1

EARTHWORK QUANTITIES

CUT:	424,280 C.Y.
FILL:	424,280 C.Y.
EXPORT:	0 C.Y.
IMPORT:	0 C.Y.

OVER EXCAVATION:
335,779 C.Y. OF CUT/FILL

QUANTITIES SHOWN ARE "FINISH GRADE" TO "EXISTING GRADE" CALCULATIONS. NO SHRINK, SWELL, OR COMPACTION FACTORS SHOWN. PAVEMENT SECTIONS, BUILDING PAD SECTIONS, TRENCH SPOILS, AND FOUNDATION SPOILS AND OTHERS HAVE BEEN INCLUDED IN THE CALCULATIONS AND SHOULD BE VERIFIED BY THE CONTRACTOR. QUANTITIES ARE SHOWN FOR INFORMATION ONLY AND SHALL BE CONFIRMED BY CONTRACTOR PRIOR TO THE START OF CONSTRUCTION. ALL EARTHWORK OPERATIONS SHALL BE PREPARED PER THE GEOTECHNICAL REPORT INCLUDING SUBGRADE PREPARATION AND DEPTHS.

0 30 60 120
SCALE: 1" = 60'

WARE MALCOMB
LEADING DESIGN FOR COMMERCIAL REAL ESTATE
4683 chabot dr
suite 300
pleasanton, ca 94588
p. 925.244.9620
waremalcomb.com

FOR AND ON BEHALF OF WARE MALCOMB

TRACY COSTCO HOM

COSTCO WHOLESALE
TRACY, CALIFOR

PRELIMINARY GRADING PLAN
(SHEET 1 OF 3)

NO.	DATE	REMARKS
	11.04.2022	PLANNING SUBMITTAL
	12.02.2022	PLANNING RESUBMITTAL

JOB NO.:	SNR22-0027
PA / PM:	
DESIGNED:	
DATE:	
PLOT DATE:	11/30/22

SHEET
C2.0
Sheet 3 of 17

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF WARE MALCOMB AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH WARE MALCOMB. WRITTEN DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF WARE MALCOMB PRIOR TO THE COMMENCEMENT OF ANY WORK.

NOT FOR CONSTRUCTION

\\Wma-arch.com\wm\SNR22\0027\00\Civil\CAD\Sheets\Planning\SNR22_0027_C2.0_Grading Plan.dwg 11/1/2022 7:46 PM BNGUYEN 1:1

APPENDIX D

Chapter 1.0, Introduction

1.1 PURPOSE AND INTENDED USES OF THE EIR

The City of Tracy ("City"), as the lead agency, determined that the proposed Tracy Costco Depot Annex Project is a "Project" within the definition of CEQA. CEQA requires the preparation of an environmental impact report (EIR) prior to approving any project, which may have a significant impact on the environment. For the purposes of CEQA, the term "Project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). As used herein, the term "Project" refers to the Tracy Costco Depot Annex project.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its significant adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development.

The City has prepared this Draft EIR to provide the decisionmakers, the public and the responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from implementation of the proposed Project. The environmental review process enables interested parties to evaluate the proposed Project in terms of its environmental consequences, to examine and recommend methods to eliminate or reduce potentially significant adverse impacts, and to consider a reasonable range of alternatives to the proposed Project. This EIR will be used by the City to determine whether to approve, modify, or deny the proposed Project and associated approvals in light of the Project's environmental effects. The EIR will be used as the primary environmental document to evaluate full development, all associated infrastructure improvements, and permitting actions associated with the proposed Project. All of the actions and components of the proposed Project are described in detail in Chapter 2.0, Project Description.

1.2 TYPE OF EIR

The State CEQA Guidelines identify several types of EIRs, each applicable to different project circumstances. This EIR has been prepared as a Project-level EIR, described in State CEQA Guidelines § 15161 as: "The most common type of EIR (which) examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation. The project-level analysis considers the broad environmental effects of the proposed Project.

1.3 KNOWN RESPONSIBLE AND TRUSTEE AGENCIES

The term "Responsible Agency" includes all public agencies other than the lead agency that have discretionary approval power over the proposed Project or an aspect of the proposed Project (CEQA Guidelines Section 15381). For the purpose of CEQA, a "Trustee" agency has jurisdiction by law over

natural resources affected by a project which are held in trust for the people of the State of California (CEQA Guidelines Section 15386).

The following agencies are considered "Responsible Agencies" or "Trustee Agencies" for the proposed Project, and may be required to issue permits or approve certain aspects of the proposed Project:

- Central Valley Regional Water Quality Control Board (CVRWQCB) – Construction activities would be required to be covered under the National Pollution Discharge Elimination System (NPDES); and a Storm Water Pollution Prevention Plan (SWPPP) would be required prior to construction activities pursuant to the Clean Water Act;
- San Joaquin Valley Air Pollution Control District (SJVAPCD) - Construction activities would be subject to the SJVAPCD codes and requirements; and
- San Joaquin LAFCo - Annexation of the Project site would be required.

1.4 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

NOTICE OF PREPARATION AND INITIAL STUDY

The City circulated an Initial Study (IS) and Notice of Preparation (NOP) of an EIR for the proposed Project on August 28, 2020 to the State Clearinghouse, State Responsible Agencies, State Trustee Agencies, Other Public Agencies, Organizations and Interested Persons. A public scoping meeting was held during the City's Planning Commission meeting on September 9, 2020 to present the Project description to the public and interested agencies, and to receive comments from the public and interested agencies regarding the scope of the environmental analysis to be included in the Draft EIR. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The IS, NOP, and comments received on the NOP by interested parties are presented in Appendix A.

DRAFT EIR

The City published a Draft EIR for the Project on September 16, 2022. The Draft EIR contained a description of the proposed Project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identified issues determined to have no impact or a less than significant impact, and provided detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR. The Draft EIR was available for public review and comment from September 16, 2022 through October 31, 2022, and the City received eight (8) comment letters on the Draft EIR from public agencies and other interested persons and parties.

Attn: Genevieve Federighi, Associate Planner
City of Tracy, Planning Division
333 Civic Center Plaza
Tracy, CA 95376
(209) 831-6435
Genevieve.federighi@cityoftracy.org

RECIRCULATED EIR

Upon review of the comments received on the Draft EIR, the City concluded that the air quality and greenhouse gas quantitative analyses should be revised to employ more conservative assumptions concerning the distance that project trucks may travel. In addition, the Project applicant responded to certain comments on the Draft EIR by incorporating into the proposed Project numerous new and additional sustainability measures and strategies to reduce emissions and vehicle trips.

To implement these new assumptions and Project changes, the City revised Chapter 1 (Introduction), Chapter 2 (Project Description), Chapter 3.2 (Air Quality), Chapter 3.7 (Greenhouse Gases, Climate Change, and Energy), and Chapter 4 (Other CEQA-Required Topics) of the Draft EIR, and on December 21, 2023, the City circulated these revised chapters of the Draft EIR for further public review and comment in a document titled Recirculated Draft EIR ("RDEIR"). These revised chapters replaced and superseded the corresponding original chapters of the Draft EIR. The public review period for the RDEIR was from December 22, 2023 through February 5, 2024. The City received five (5) comment letters on the RDEIR from public agencies and other interested persons and parties.

RESPONSE TO COMMENTS/FINAL EIR

Following the public review period on the RDEIR, the City prepared written responses to all comments received on the Draft EIR and the RDEIR, and to all comments on these environmental documents received during public meetings held as part of the Project's environmental review process. In September 2024, the City published these responses, together with copies of the comments themselves and a summary of all revisions made to the Draft EIR and RDEIR, in a document titled Responses to Comments ("RTC"). Together, the Draft EIR, the RDEIR, and the RTC comprise the Final EIR for the Project.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The City will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete", the City Council may certify the Final EIR in accordance with CEQA. Under CEQA, an EIR can be certified if:

1) The EIR shows a good faith effort at full disclosure of environmental information; and

2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of environmental considerations.

Following review and consideration of the Final EIR, the City may take action to approve, modify, or reject the proposed Project. If the Project is approved, a Mitigation Monitoring and Reporting Program ("MMRP"), as described below, would also be adopted in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097This MMRP will be designed to ensure that these measures are carried out during project implementation, in a manner that is consistent with the EIR.

1.5 ORGANIZATION AND SCOPE

Sections 15122 through 15132 of the State CEQA Guidelines identify the content requirements for EIRs. An EIR must include a description of the project and its environmental setting, an environmental impact analysis, mitigation measures, alternatives, significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. Discussion of the environmental issues addressed in this EIR was established through review of environmental and planning documentation developed for the proposed Project, environmental and planning documentation prepared for recent projects located within the City, applicable local and regional planning documents, and responses to the Notice of Preparation (NOP).

The EIR is organized in the following manner:

EXECUTIVE SUMMARY

The Executive Summary summarizes the characteristics of the proposed project, known areas of controversy and issues to be resolved, and provides a concise summary matrix of the proposed Project's environmental impacts and possible mitigation measures. The Executive Summary also identifies the alternatives that reduce or avoid at least one significant environmental effect of the proposed Project.

CHAPTER 1.0 – INTRODUCTION

Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead, trustee, and responsible agencies, summarizes the process associated with preparation and certification of an EIR, and identifies the scope and organization of the EIR.

CHAPTER 2.0 – PROJECT DESCRIPTION

Chapter 2.0 provides a detailed description of the proposed Project, including the location, intended objectives, background information, the physical and technical characteristics, including the decisions subject to CEQA, related improvements, and a list of related agency action requirements.

CHAPTER 3.0 – ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

Chapter 3.0 contains an analysis of environmental topic areas as identified below. Each subchapter addresses a topical area and is organized as follows:

Environmental Setting. A description of the existing environment as it pertains to the topical area.

Regulatory Setting. A description of the regulatory environment that may be applicable to the proposed Project.

Impacts and Mitigation Measures. Identification of the thresholds of significance by which impacts are determined, a description of project-related impacts associated with the environmental topic, identification of appropriate mitigation measures, and a conclusion as to the significance of each impact.

The following environmental topics are addressed in this section:

- Aesthetics and Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural and Tribal Resources
- Geology and Soils
- Greenhouse Gases, Climate Change, and Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Public Services
- Transportation and Circulation
- Utilities and Service Systems

It is noted that the Initial Study for the Project (see Appendix A) concluded that impacts related to Mineral Resources, Population and Housing, Recreation, and Wildfire were determined to be less than significant.

CHAPTER 4.0 – OTHER CEQA-REQUIRED TOPICS

Chapter 4.0 evaluates and describes the following CEQA required topics: impacts considered less-than-significant, significant and irreversible impacts, growth-inducing effects, cumulative, and significant and unavoidable environmental effects.

CHAPTER 5.0 – ALTERNATIVES TO THE PROJECT

State CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to the proposed Project, which could feasibly attain the basic objectives of the proposed Project and avoid and/or lessen any significant environmental effects of the proposed Project. Chapter 5.0 provides a comparative analysis between the environmental impacts of the proposed Project and the selected alternatives.

CHAPTER 6 – REPORT PREPARERS

This section lists all authors and agencies that assisted in the preparation of the EIR, by name, title, and company or agency affiliation.

APPENDICES

This section includes all notices and other procedural documents pertinent to the EIR, as well as technical material prepared to support the analysis.

1.6 COMMENTS RECEIVED ON THE NOTICE OF PREPARATION

The City of Tracy received three written comment letters on the NOP for the proposed Project from the agencies listed below. Copies of those NOP comment letters are provided in Appendix A of this EIR. The commenting agency/citizen is provided below. The City also held a public scoping meeting on September 9, 2020. No written or verbal comments were provided at that scoping meeting.

- California Department of Conservation;
- Central Valley Regional Water Quality Control Board;
- San Joaquin Valley Air Pollution Control District.

1.7 POTENTIAL AREAS OF CONCERN

Aspects of the proposed project that were determined may be of public concern include the following:

- The type and amount of agricultural land converted to urban uses;
- Impacts on any current and future agricultural operations in the vicinity;
- Potential impacts to surface and groundwater;
- Project-related construction and/or operational emissions potentially exceeding SJVAPCD thresholds;
- Operational emissions from off-road equipment (i.e., forklifts) and/or on-road equipment (i.e., mobile yard trucks with the ability to move materials) during Project operation;
- Truck routing and heavy-duty truck air emissions potentially impacting residential communities and sensitive receptors; and
- Toxic Air Contaminants impact on surrounding sensitive receptors.