

**County of Fresno** 

DEPARTMENT OF PUBLIC WORKS AND PLANNING STEVEN E. WHITE, DIRECTOR

## **EVALUATION OF ENVIRONMENTAL IMPACTS**

- APPLICANT: Sentry Ag Services, LLC
- APPLICATION NOS.: Classified Conditional Use Permit No.3768 and Initial Study No. 8428
- DESCRIPTION: Allow an existing dairy to increase current milk cow herd size by 1,800 head, for a total of 5,000 milk cow heads, increase dry from 480 heads to 600 dry heads and allow the construction of one free stall barn, one hospital barn, and two Saudi-style barns, on a 598.9-acre parcel, within the AE-20 (Exclusive Agricultural, 20-acre minimum parcel size) Zone District Zone District..
- LOCATION: The subject parcel is located on the southwest corner of west Elkhorn Avenue and south Howard Avenue, approximately 10.6-miles from the City of San Joaquin. (050-160-20s) (13695 W. Elkhorn Avenue) (Sup. Dist.1).

## I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

- A. Have a substantial adverse effect on a scenic vista; or
- B. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project proposes to expand the operational capacity of the existing dairy through the increase of herd size by 1,920 heads of cattle and four barns. The project site is situated in a flat agricultural utilized area. There were no scenic vistas identified as being impacted by the project. Figure OS-2 of the Fresno County General Plan indicates that there are no scenic roadways fronting the project site, and no scenic resources were identified on the project site or being affected by the project.

C. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized

area, would the project conflict with applicable zoning and other regulations governing scenic quality? FINDING: NO IMPACT:

The project site is already improved with a dairy operation. The project intends to expand their operation through an increase in herd size and four barns. The existing visual character of the area would not be changed by this project; therefore, no impacts scenic resources would occur.

D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

FINDING: NO IMPACT:

There is no new development proposed with this project and with consideration of the existing dairy operation, no new substantial light of glare is anticipated with this project.

II. AGRICULTURAL AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology in Forest Protocols adopted by the California Air Resources Board. Would the project:

- A. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use; or
- B. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

FINDING: NO IMPACT:

According to the 2016 Fresno County Important Farmland Map, the project site is comprised of land designated Confined Animal Agriculture. As the project proposal will not expand past the existing footprint, the project would not convert Farmland to non-agricultural use. The project site is in the Williamson Act Contract No. 1521 and per the comments received from Policy Planning and Fresno County Zoning Ordinance, dairies are a permitted use of land under Williamson Act Contract and as such there are no Williamson Act Program Issues with the proposed project, the existing dairy is an allowed use with the proposed expansion being required to be subject to a Conditional Use Permit application.

- C. Conflict with existing zoning for forest land, timberland or timberland zoned Timberland Production; or
- D. Result in the loss of forest land or conversion of forest land to non-forest use? FINDING: NO IMPACT:

The project site is not zoned for forest land timberland and would not result in the loss or conversion of forest land.

E. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

FINDING: NO IMPACT:

The project will be confined to the existing boundaries of the operating dairy and would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

- A. Conflict with or obstruct implementation of the applicable Air Quality Plan; or
- B. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project has been routed to the San Joaquin Valley Air Pollution Control District (SJVAPCD) for review and comment. No adverse comments were received with the project to indicate that the project would result in a conflict with an applicable Air Quality Plan or result in cumulatively considerable net increase of any criteria pollutant. Based on the project's mandatory compliance with SJVAPCD regulatory requirements, the project would not be in conflict with the applicable Air Quality Plan and would not result in a cumulatively considerable increase in criteria pollutants.

According to the Air Quality Assessment prepared by JK Consulting Group, LLC for the proposal by Sentry Ag Services dated September 24, 2023, project operational emissions would not result in an increase in the frequency or severity of any air quality standards violation and would not cause a new air quality standard violation and is consistent with SJVAPCD's AQP's in that construction and operational emissions associated with the Project would not exceed established SJVAPCD emission thresholds.

- C. Expose sensitive receptors to substantial pollutant concentrations; or
- D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project site is located in an area of large farming parcels, dairies. Therefore, any nuisance odors generated by the increase in herd size is likely to be insignificant and would not adversely affect a substantial number of people.

According to the Air Quality Assessment prepared by JK Consulting Group, LLC for the proposal by Sentry Ag Services dated September 24, 2023, Project operational emissions would not result in an increase in the frequency or severity of any air quality standards violation and would not cause a new air quality standard violation and would not expose sensitive receptors to toxic air emissions or generateTAC's that would have a significant impact on the environment

IV. BIOLOGICAL RESOURCES

Would the project:

- A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

FINDING: NO IMPACT:

No habitat for special status species, nor riparian or other sensitive natural communities were identified by any reviewing agencies. Staff review of the California Department of Fish and Wildlife, Natural Diversity Database (CNDDB) web application indicates that the subject property is within the predicted habitat of the state listed as threatened tricolored blackbird and the giant garter snake, which is also listed federally as threatened. However, the project proposes an increase of 1,920 head of cattle to an existing dairy site and inhabited by 3,680 head of cattle. The proposed herd size increase will be accommodated within the existing dairy, therefore the project will not have a substantial adverse impact on habitat for special species, or sensitive natural community.

C. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

FINDING: NO IMPACT:

Based on a review of the U.S. Fish and Wildlife Service, National Wetlands Inventory (NWI) Wetlands Mapper web application, no federally protected wetlands are present on the subject property.

C. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

FINDING: NO IMPACT:

The project is proposed on land currently occupied by a dairy farm, and proposes a herd size increase to be accommodated within the existing parcel boundaries, therefore no impacts to existing fish and wildlife corridors are anticipated to occur. No native wildlife nursery sites were identified by any reviewing agencies.

D. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

FINDING: NO IMPACT:

No local biological resource protection policies were identified in the analysis.

E. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?

FINDING: NO IMPACT:

No habitat conservation or natural community conservation plans were identified which the project would conflict with.

V. CULTURAL RESOURCES

Would the project:

- A. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; or
- B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- C. Disturb any human remains, including those interred outside of formal cemeteries?

LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORTATED:

The parcel on which the proposed project will be sited is located within proximity of an area designated to be medium sensitive for archeological resources. No historical or paleontological resources, unique geological features, or evidence of possible human remains were identified in this analysis and no cultural or historical resources were identified in the analysis or by any reviewing agencies. As such, no impact on historical, archeological, or paleontological resources would result from this proposal. A mitigation measure will be implemented to address cultural resources in the unlikely event that they are unearthed during ground-disturbing activities related to the project.

## \* Mitigation Measure(s)

- 1. In the event that cultural resources are unearthed during ground-disturbing activities, all work shall be halted in the area of the find. An Archeologist shall be called to evaluate the findings and make any necessary mitigation recommendations. If human remains are unearthed during ground disturbing activities, no further disturbance is to occur until the Fresno County Sheriff-Coroner has made the necessary findings as to origin and disposition. All normal evidence procedures shall be followed by photos, reports, video, and etc. If such remains are determined to be Native American, the Sheriff-Coroner must notify the Native American Commission within 24 hours.
- VI. ENERGY

Would the project:

- 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?

FINDING: NO IMPACT:

The project entails an increase in animal herd size at an existing dairy; no increase in the use of energy or consumption of energy resources is anticipated to result from this proposal.

VII. GEOLOGY AND SOILS

Would the project:

- A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

- 2. Strong seismic ground shaking?
- 3. Seismic-related ground failure, including liquefaction?
- 4. Landslides?

FINDING: NO IMPACT:

According to Figure 9-5 (Probabilistic Seismic Hazards (10% Probability in 50 years) of the Fresno County General Plan Background Report, the subject property is not located in an area at increased risk (above 20%) from seismic activity.

B. Result in substantial soil erosion or loss of topsoil?

FINDING: NO IMPACT:

The project does propose to displace or move topsoil in quantities such that substantial erosion or loss of topsoil would occur. Additionally, the subject parcel is not located in an area identified as being prone to erosion, according to Figure 7-4 (Erosion Hazards in Western Fresno County).

- C. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; or
- C. Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

FINDING: NO IMPACT:

The subject parcel is not located in an area of expansive soils as identified by Figure 7-1 (Expansive Soils) of the Fresno County General Plan Background Report (FCGPBR).

D. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

FINDING: NO IMPACT:

The project does not propose any increased use of septic tanks or other wastewater disposal systems.

E. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

FINDING: NO IMPACT:

No paleontological resources on or in the vicinity of the subject property, were identified by any reviewing agencies.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

- A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- B. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

FINDING: LESS THAN SIGNIFICANT IMPACT:

According to the Greenhouse Gas Analysis and Air Quality Assessment prepared by JK Consulting Group, LLC for the proposal by Sentry Ag Services dated September 24, 2023 the subject site is an existing dairy operation and the proposed increase of 1,920 head of cattle would have a less than significant impact on Greenhouse Gas Emissions.

The Greenhouse Gas Analysis asserts that the project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment and will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Based on the dairy's adherence to its existing nutrient management plan, waste discharge plan, and the aforementioned manure handling practices, the proposal to increase the existing herd size by 1,920 head of cattle, has been determined to have a less than significant impact on GHG emissions.

## VIII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- B. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

FINDING: NO IMPACT:

The project does not propose any use or transport of hazardous materials. The project involves an increase in herd size at an active dairy site and there is no substantial change in the existing operation proposed with this application. The project will be required to comply with its existing waste management plan, which is required by the California Regional Quality Control Board, reissued Diary General Order.

C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

FINDING: NO IMPACT:

The project site is not located within one quarter mile of an existing school. According to a review of the County's Geographic Information System, the nearest schools are located approximately nine miles southeast, within the unincorporated community of Riverdale.

D. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

FINDING: NO IMPACT:

Based on a review of the U.S. EPA NEPAssist mapping tool, and NEPAssist report, the project site is not an identified hazardous material site.

- E. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area; or
- F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

FINDING: NO IMPACT:

The project has no features which would impair implementation of an emergency response plans or emergency evacuation plans. The project was reviewed by the Fresno County Fire Protection District

G. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

FINDING: NO IMPACT:

The subject property is not located in an area identified as being at increased risk from wildfire.

X. HYDROLOGY AND WATER QUALITY

Would the project:

A. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

## FINDING: LESS THAN SIGNIFICANT IMPACT:

The existing dairy is regulated by the California Regional Water Quality Control Board, under the reissued Diary General Order, which requires compliance with the waste discharge requirements, a report of waste discharge and with a Waste Management Plan established by the dairy and approved by the Waterboard. With compliance with applicable regulatory requirements, the project would have a less than significant impact.

- B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; or
- C. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site?
  - 1. Result in substantial erosion or siltation on- or off-site;
  - 2. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?
  - 3. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
  - 4. Impede or redirect flood flows?
- D. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

FINDING: NO IMPACT:

The subject parcel is not located in an area prone to seiche, or tsunami. According to FEMA FIRM Panel 2850J, the subject property is in Flood Zone X, and is not subject to flooding from the 100-year storm.

E. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The dairy is subject to regulation by the Central Valley Regional Water Quality Control Board. The dairy will be required to submit an updated Report of Waste Discharge

## XI. LAND USE AND PLANNING

Would the project:

- A. Physically divide an established community; or
- B. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

## FINDING: NO IMPACT:

The project does not propose any development which would physically divide a community, nor conflict with any land use plan, policy or regulation. The proposed herd size increase and four proposed barns is consistent with the existing land use and with surrounding land uses, and may be allowed subject to discretionary review and approval, and also subject to any applicable regulatory controls.

## XII. MINERAL RESOURCES

Would the project:

- A. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or
- B. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local General Plan, Specific Plan or other land use plan?

FINDING: NO IMPACT:

According to Figures 7-8 (Principal Mineral Producing Locations (1997-1998), and 7-7 (Mineral Resource Locations), and 7-9 (Generalized Mineral Resource Classifications), of the Fresno County General Plan Background Report (FCGPBR), the subject property is not in an identified mineral producing area. According to Figure 7-7, the property appears to be located in Mineral Resource Zone MRZ-1 (Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

## XIII. NOISE

Would the project result in:

- A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or
- B. Generation of excessive ground-borne vibration or ground-borne noise levels; or
- C. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels; or

## FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed construction with this application and no features of the operation or proposed increase in herd size which would result in a substantial increase in ambient noise levels or excessive ground-borne noise levels as surrounding areas is remote agricultural land and only one residence is within one mile of subject property. The subject parcel is not located within two miles of a public, or private airport or within the boundaries of an airport land use plan.

## XIV. POPULATION AND HOUSING

Would the project:

- A. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?; or
- B. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

FINDING: NO IMPACT:

There are no features of the project which would induce population growth or displace any people.

XV. PUBLIC SERVICES

Would the project:

- A. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically-altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?
  - 1. Fire protection;
  - 2. Police protection;
  - 3. Schools;
  - 4. Parks; or
  - 5. Other public facilities?

FINDING: NO IMPACT:

The project will not require the provision of any new or physically altered, government services, or facilities.

## XVI. RECREATION

Would the project:

- A. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- B. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

FINDING: NO IMPACT:

The project will not involve the use of or require the construction or expansion of any recreational facilities.

XVI. TRANSPORTATION

Would the project:

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

FINDING: NO IMPACT:

The project will not involve increased use of County roads nor conflict with any County circulation plans

B. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

FINDING: LESS THAN SIGNIFICANT IMPACT

The project will not result in an substantial increase in vehicle miles travelled (VMT) as proposed employee increase is one additional employee.

C. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

FINDING: NO IMPACT:

The project does not propose any road design features, and will not increase hazards to traffic.

D. Result in inadequate emergency access?

FINDING: NO IMPACT:

No changes physical changes to access to the existing facilities will occur. The project will be required to comply with applicable provisions of the current Fire Code with regard to emergency access.

## XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

- A. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
  - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

## FINDING: LESS THAN SIGNIFICANT IMPACT:

The subject site is currently an existing operational diary and is located within proximity of an area designated to be medium sensitive for archeological resources. Under the provisions of Assembly Bill 52 (AB 52), participating California Native American Tribes were notified of the project proposal and given the opportunity to enter into consultation with the County on addressing potential tribal cultural resources. No concerns were expressed by notified California Native American Tribes and no consultation request was received. Therefore, mitigation will be implemented to address tribal cultural resources in the unlikely event they are unearthed during ground-disturbing activities related to the project.

## \* Mitigation Measure(s)

1. In the event that cultural resources are unearthed during ground-disturbing activities, all work shall be halted in the area of the find. An Archeologist shall be called to evaluate the findings and make any necessary mitigation recommendations. If human remains are unearthed during ground disturbing activities, no further disturbance is to occur until the Fresno County SheriffCoroner has made the necessary findings as to origin and disposition. All normal evidence procedures shall be followed by photos, reports, video, and etc. If such remains are determined to be Native American, the Sheriff-Coroner must notify the Native American Commission within 24 hours.

## XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

A. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

FINDING: NO IMPACT:

No changes, or modification of existing utilities infrastructure are required for this project proposal.

B. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

FINDING: NO IMPACT:

The project proposal was reviewed by the County Water and Natural Resources Division of the Department of Public Works and Planning, which had no concerns about project water supply. Additionally, the project site is not located in an identified low water area of the County.

C. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

FINDING: NO IMPACT:

The project's wastewater discharge is regulated by the State Regional Water Quality Control Board. Based on previous similar projects, submittal of a Waste Management Plan prepared by a Registered Civil Engineer should be needed to demonstrate that it has the capacity to handle the increase herd size. The dairy will also be required to submit a Report of Waste Discharge to the Regional Water Board for review and approval.

- D. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
- E. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

FINDING: NO IMPACT:

The project is subject to all applicable state and local solid waste disposal standards.

XX. WILDFIRE

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

- A. Substantially impair an adopted emergency response plan or emergency evacuation plan, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; or
- B. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; or
- C. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- D. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

FINDING: NO IMPACT:

The project site is not located in a State Responsibility Area or area of increased risk from wildfire. The project site is not located is a very

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

A. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

FINDING: NO IMPACT:

No project impacts to wildlife habitat or historical or cultural resources were identified by County staff or any reviewing agencies.

B. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

FINDING: NO IMPACT:

No reviewing agencies identified the potential for cumulatively considerable impacts resulting from the project.

C. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

FINDING: NO IMPACT:

No identified environmental effects of the project, such as wastewater discharge to land resulting in impacts to groundwater, or air quality impacts from increased in greenhouse gas and criteria pollutants, were anticipated to result in substantial adverse impacts on human beings.

### CONCLUSION/SUMMARY

Based upon the Initial Study prepared for Classified Conditional Use Permit No.3768, staff has concluded that the project will not have a significant effect on the environment.

It has been determined that there would be no impacts to Aesthetics, Agricultural and Forestry Resources, Biological Resources, Cultural Resources, Energy, Hazards and Hazardous Materials, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, Utilities and Services Systems and Wildfire.

Potential impacts related to Air Quality, Greenhouse Gas Emissions, Hydrology and Water Quality have been determined to be less than significant.

A Negative Declaration is recommended and is subject to approval by the decision-making body. The Initial Study is available for review at 2220 Tulare Street, Suite A, street level, located on the southwest corner of Tulare and "M" Street, Fresno, California.

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County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING STEVEN E. WHITE, DIRECTOR

## **INITIAL STUDY APPLICATION**

## **INSTRUCTIONS**

Answer all questions completely. An incomplete form may delay processing of your application. Use additional paper if necessary and attach any supplemental information to this form. Attach an operational statement if appropriate. This application will be distributed to several agencies and persons to determine the potential environmental effects of your proposal. Please complete the form in a legible and reproducible manner (i.e., USE BLACK INK OR TYPE).

OFFICE USE ONL	Y
IS No.	_
Project	
No(s)	-
Application Rec'd .:	

## GENERAL INFORMATION

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가지 것 같은 것이 같은 것이 있는 것이 같은 것이 같이 있는 것이 것 같은 것이 집에 있는 것이 없다. 이 것이 없는 것이 같이 많이 있는 것이 같이 있는 것이 없는 것이 없는 것이 없는 것이 있는
style barns.
een Howard and Madera Avenues.
CA 93656
Parcel Size: 110 acres

2220 Tulare Street, Sixth Floor / Fresno, California 93721 / Phone (559) 600-4497 / 600-4022 / 600-4540 / FAX 600-4200 The County of Fresno is an Equal Employment Opportunity Employer

- 10. Land Conservation Contract No. (If applicable):
- 11. What other agencies will you need to get permits or authorization from:
  - LAFCo (annexation or extension of services)
     SJVUAPCD (Air Pollution Control District)

     CALTRANS
     Reclamation Board

     Division of Aeronautics
     Department of Energy

     Water Quality Control Board
     Airport Land Use Commission

     Other
     Other
- 12. Will the project utilize Federal funds or require other Federal authorization subject to the provisions of the National Environmental Policy Act (NEPA) of 1969? \_\_\_\_ Yes X\_\_ No

If so, please provide a copy of all related grant and/or funding documents, related information and environmental review requirements.

- 13. Existing Zone District1: AE-20
- 14. Existing General Plan Land Use Designation<sup>1</sup>:

#### ENVIRONMENTAL INFORMATION

15. Present land use: Existing dairy heifer facility Describe existing physical improvements including buildings, water (wells) and sewage facilities, roads, and lighting. Include a site plan or map showing these improvements:

Describe the major vegetative cover:

Any perennial or intermittent water courses? If so, show on map:

Is property in a flood-prone area? Describe: Flood Zone X

16. Describe surrounding land uses (e.g., commercial, agricultural, residential, school, etc.):

North: Pistachios

South: Orchard

East: Dairy

West: Field crops

- 17. What land use(s) in the area may be impacted by your Project?: None
- 18. What land use(s) in the area may impact your project?: None

19. Transportation:

- NOTE: The information below will be used in determining traffic impacts from this project. The data may also show the need for a Traffic Impact Study (TIS) for the project.
- A. Will additional driveways from the proposed project site be necessary to access public roads? Yes X No

### B. Daily traffic generation:

I.	<b>Residential</b> - Number of Units	-
	Lot Size	
	Single Family	
	Apartments	
II.	Commercial - Number of Employees	
	Number of Salesmen	
	Number of Delivery Trucks	
	Total Square Footage of Building	
	[1] A. Sanakar, "An and a strain in Proceeding Straining Strain	

III. Describe and quantify other traffic generation activities:

- 20. Describe any source(s) of noise from your project that may affect the surrounding area: None
- 21. Describe any source(s) of noise in the area that may affect your project: None

22. Describe the probable source(s) of air pollution from your project: Equipment used for barms.

23. Proposed source of water:
 (X) private well
 () community system<sup>3</sup>--name:

24.	Anticipated volume of water to be used (gallons per day) <sup>2</sup> : 349,600
27,	Anacipaca volume of water to be used (ganons per day) .
25.	Proposed method of liquid waste disposal:
	( ) septic system/individual ( ) community system <sup>3</sup> -name Existing system in place
26.	Estimated volume of liquid waste (gallons per day) <sup>2</sup> : 360,000
27.	Anticipated type(s) of liquid waste:Cow manure
28.	Anticipated type(s) of hazardous wastes2: None
29.	Anticipated volume of hazardous wastes <sup>2</sup> : None
30.	Proposed method of hazardons waste disposal <sup>2</sup> :None
31.	Anticipated type(s) of solid waste:
32.	Anticipated amount of solid waste (tons or cubic yards per day): 7 bone dry tons
33.	Anticipated amount of waste that will be recycled (tons or cubic yards per day): None
34.	Proposed method of solid waste disposal:Field spread / export off site
35.	Fresno County Fire Protection District
36.	Has a previous application been processed on this site? If so, list title and date:
37.	Do you have any underground storage tanks (except septic tanks)? YesNo
38.	If yes, are they currently in use? Yes No
To	THE BEST OF MY KNOWLEDGE, THE FOREGOING INFORMATION IS TRUE.
<	Thank lander 03-22-2023
SI	<b>DATE</b>

<sup>1</sup>Refer to Development Services Conference Checklist <sup>2</sup>For assistance, contact Environmental Health System, (559) 600-3357 <sup>3</sup>For County Service Areas or Waterworks Districts, contact the Resources Division, (559) 600-4259

(Revised 5/2/16)

## NOTICE AND ACKNOWLEDGMENT

#### **INDEMNIFICATION AND DEFENSE**

The Board of Supervisors has adopted a policy that applicants should be made aware that they may be responsible for participating in the defense of the County in the event a lawsuit is filed resulting from the County's action on your project. You may be required to enter into an agreement to indemnify and defend the County if it appears likely that litigation could result from the County's action. The agreement would require that you deposit an appropriate security upon notice that a lawsuit has been filed. In the event that you full to comply with the provisions of the agreement, the County may rescind its approval of the project.

#### STATE FISH AND WILDLIFE FEE

State law requires that specified fees (effective January 1, 2017: \$3,078.25 for an EIR; \$2,216.25 for a (Mitigated/Negative Declaration) be paid to the Culifornia Department of Fish and Wildlife (CDFW) for projects which must be reviewed for potential adverse effect on wildlife resources. The County is required to collect the fees on behalf of CDFW. A \$50,00 handling fee will also be charged, as provided for in the legislation, to defray a portion of the County's costs for collecting the fees.

The following projects are exempt from the jees:

- 1. All projects statutorily exempt from the provisions of CEQA (California Environmental Quality Act).
- All projects categorically exempt by regulations of the Secretary of Resources (State of California) from the requirement to prepare environmental documents.

A fee exemption may be issued by CDFW for eligible projects determined by that agency to have "no effect on wildlife." That determination must be provided in advance from CDFG to the County at the request of the applicant. You may wish to call the local office of CDFG at (559) 222-3761 if you need more information.

Upon completion of the Initial Study you will be notified of the applicable fee. Payment of the fee will be required before your project will be forwarded to the project analyst for scheduling of any required hearings and final processing. The fee will be refunded if the project should be denied by the County.

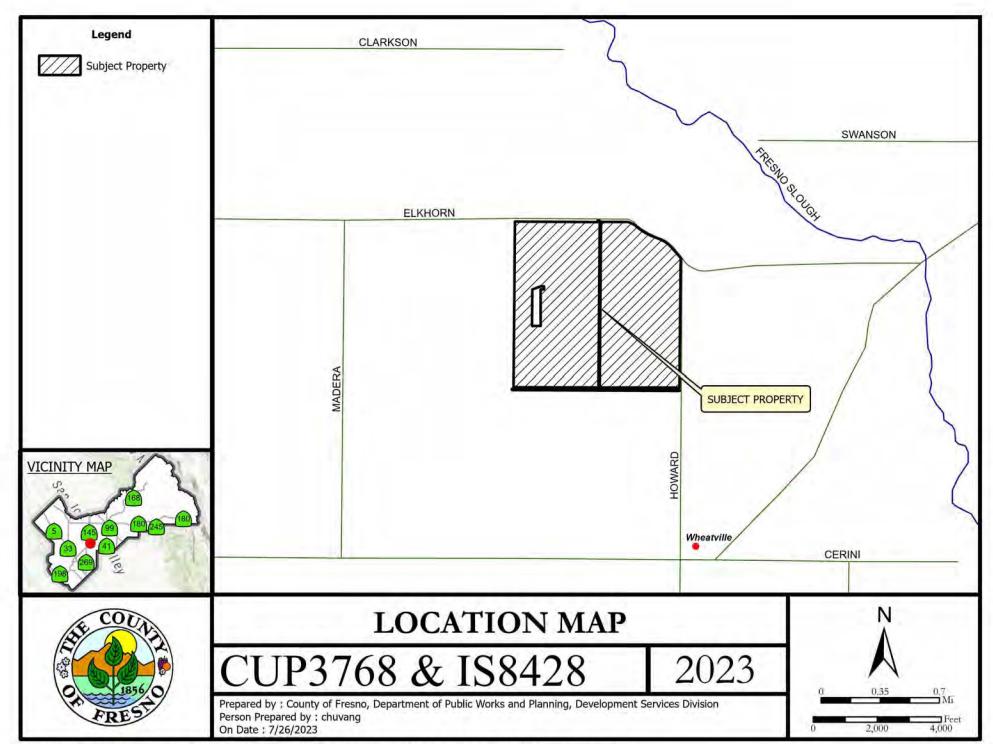
ale Ino De Hor-

Applicant's Signature

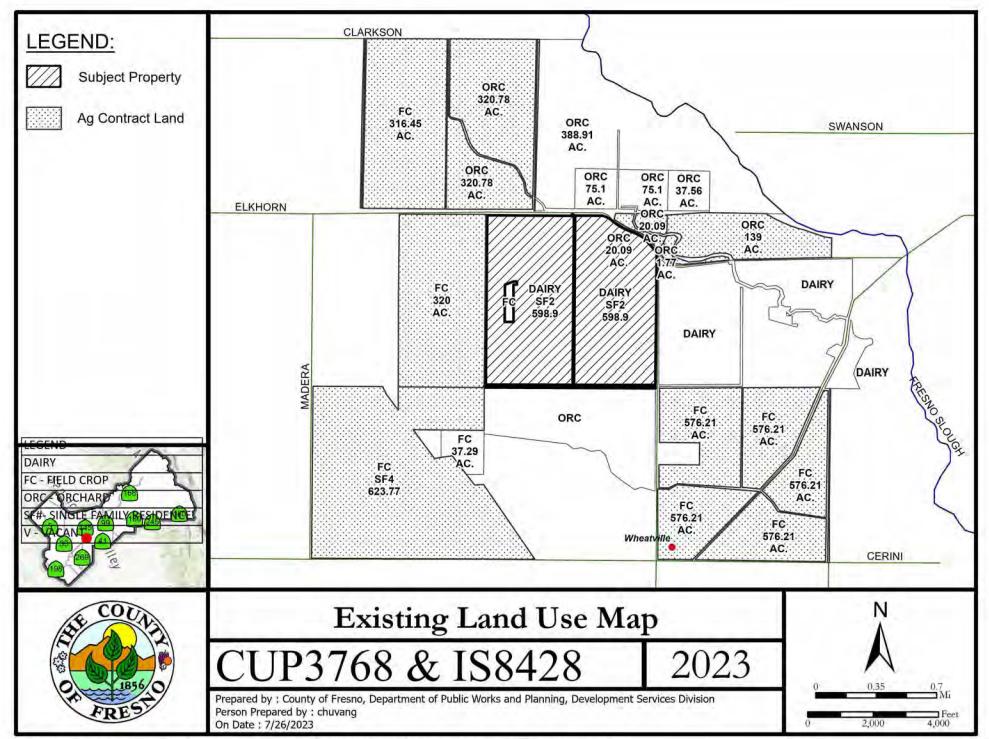
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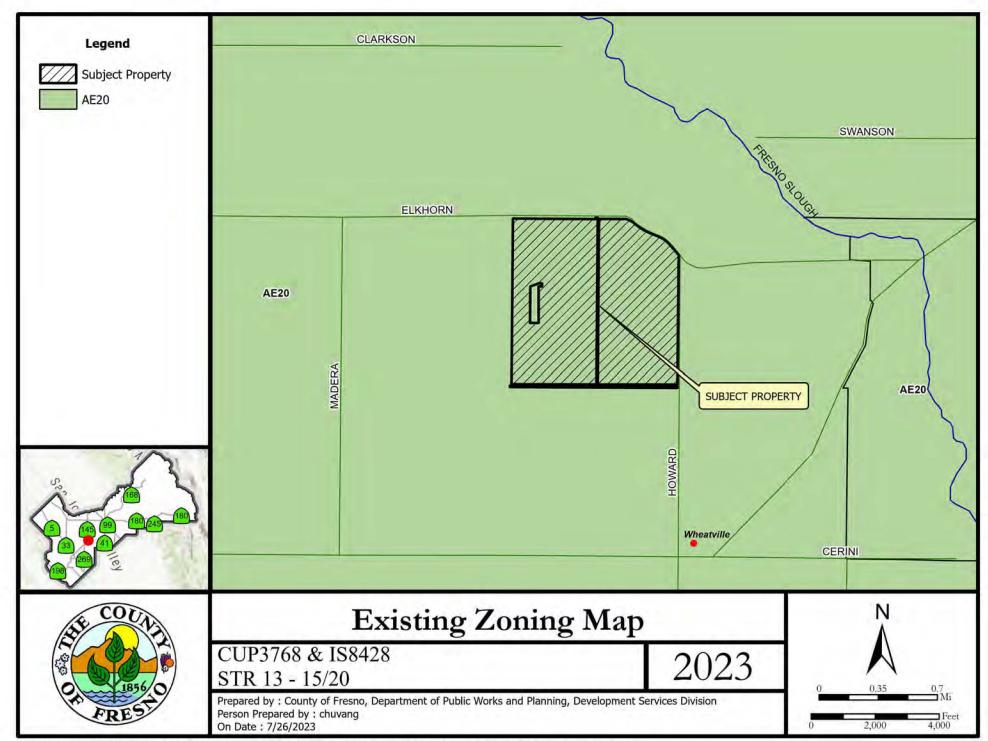
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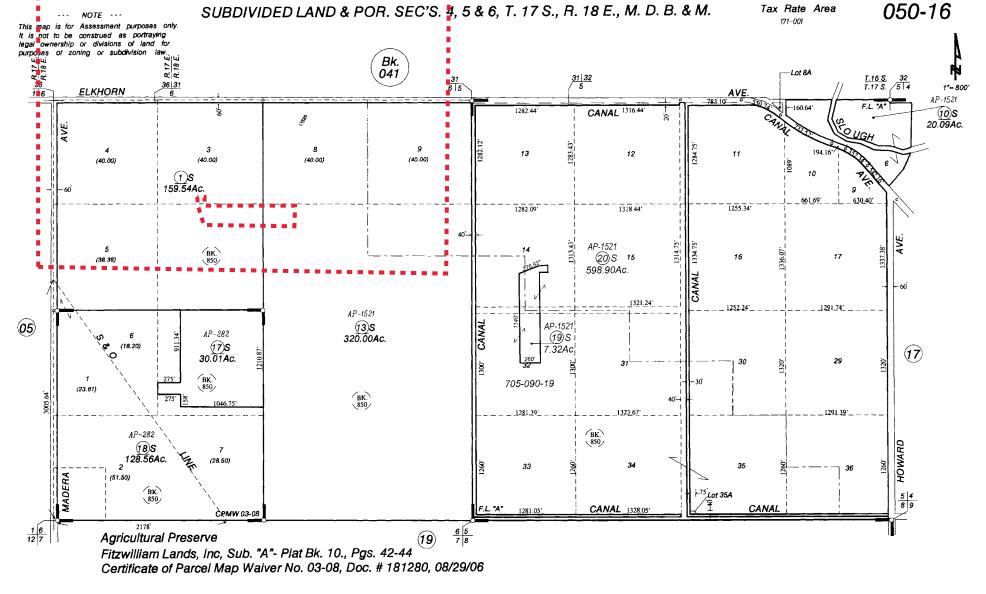
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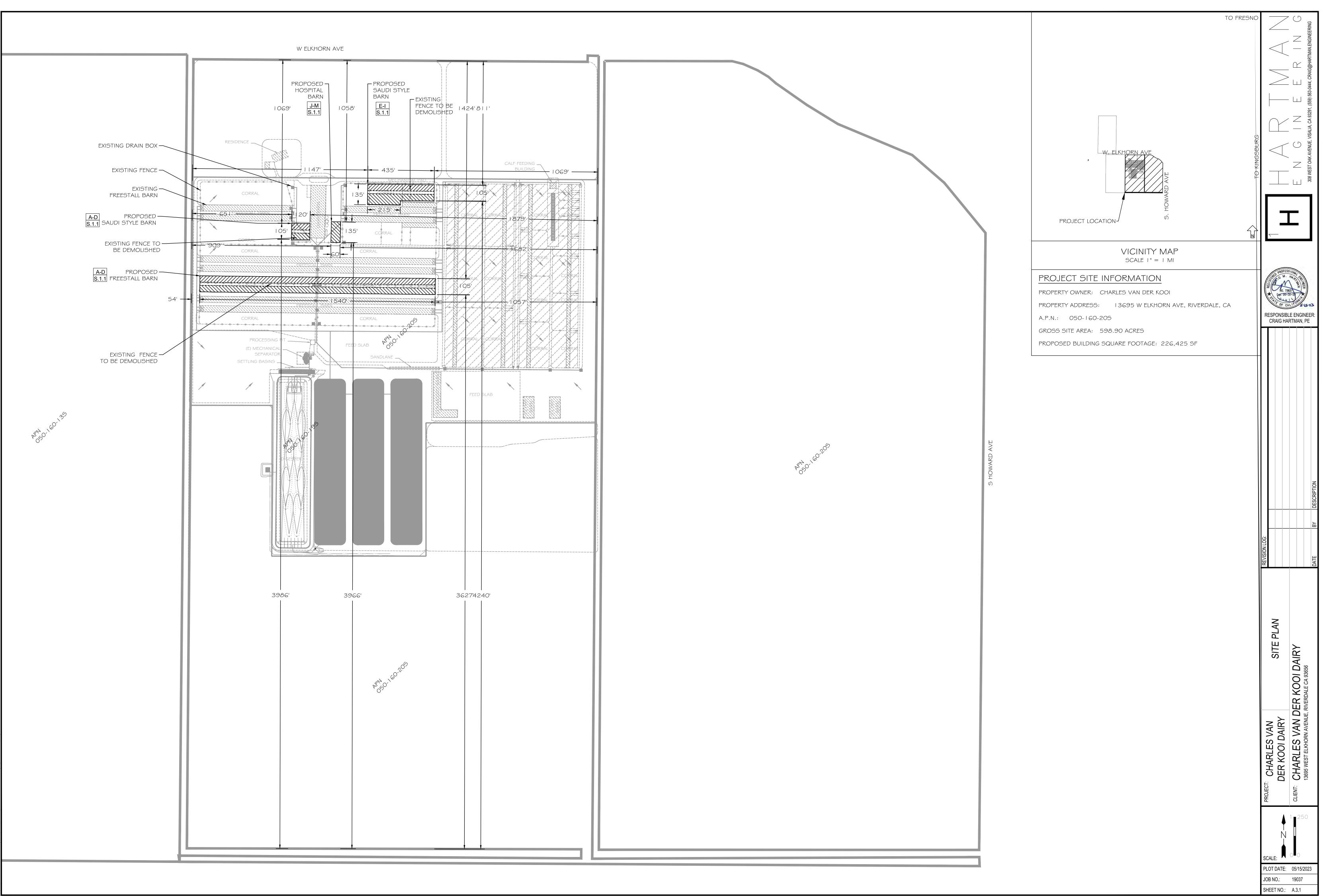
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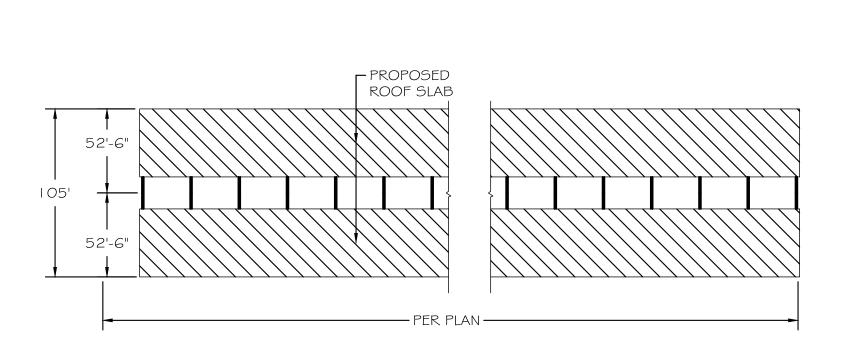
Assessor's Map Bk.050 - Pg. 16 County of Fresno, Calif.

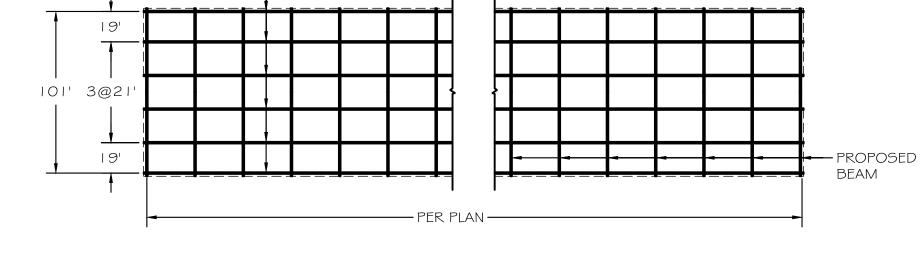
NOTE - Assessor's Block Numbers Shown in Ellipses. Assessor's Parcel Numbers Shown in Circles.



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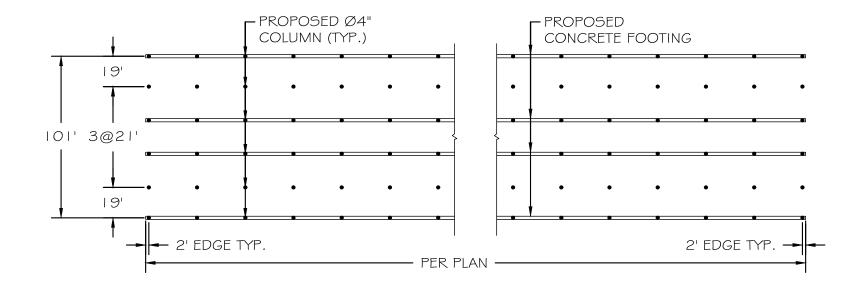






C PROPOSED FREESTALL BARN FRAMING PLAN

- PROPOSED GIRDER





52'-6"

- 2'-0"

|4'-2"

- 105'-0" ----

31'-4<del>/</del>"

**-** 52'-6" ·

53'-0"

2'-0" --

Ø4" PIPE -

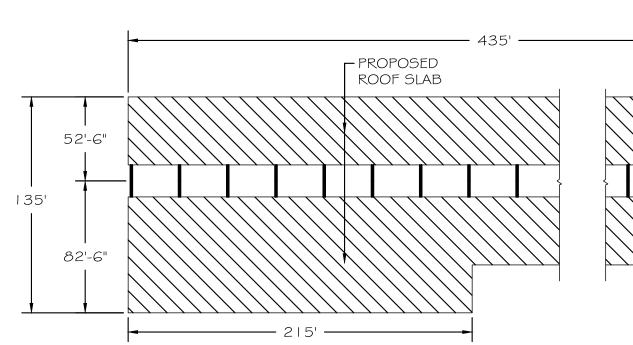
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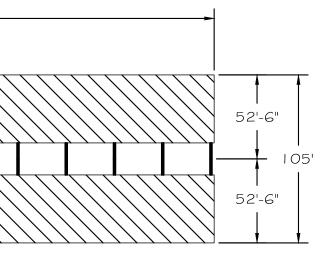
SCALE | " : 15'

|4'-2"

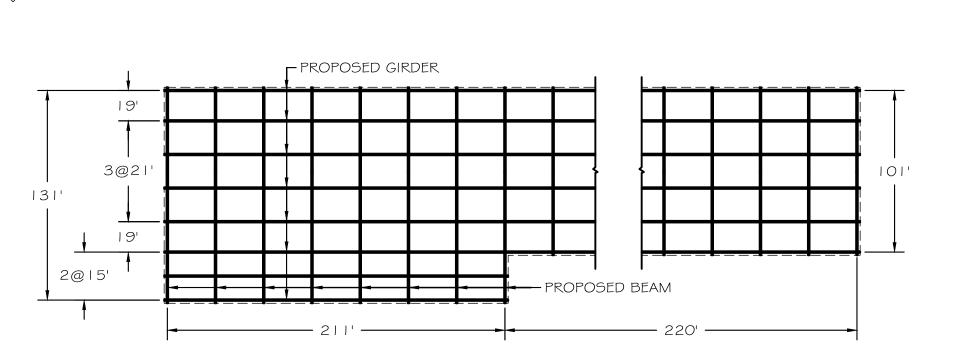






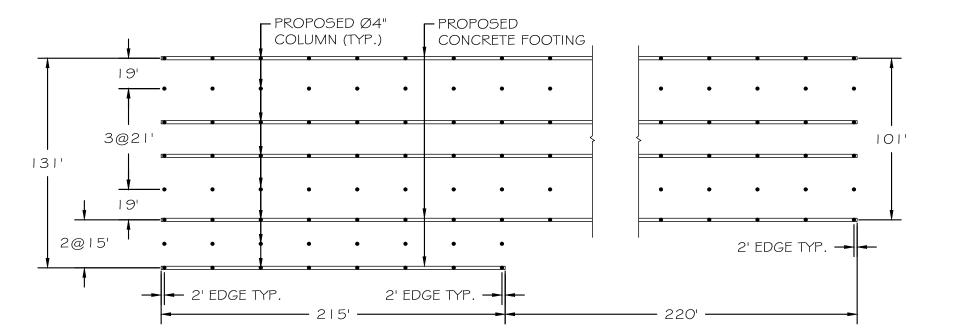


PROPOSED SAUDI STYLE BARN FRAMING PLAN

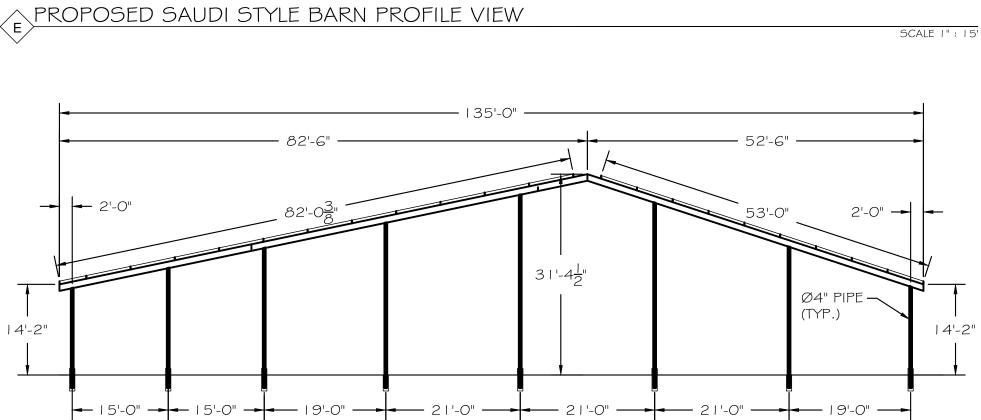






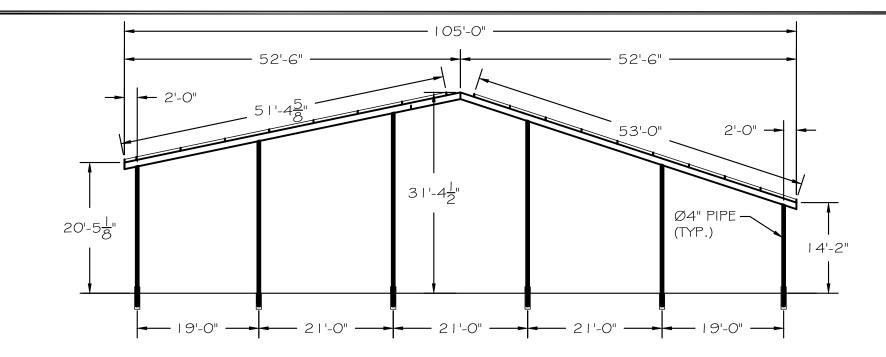


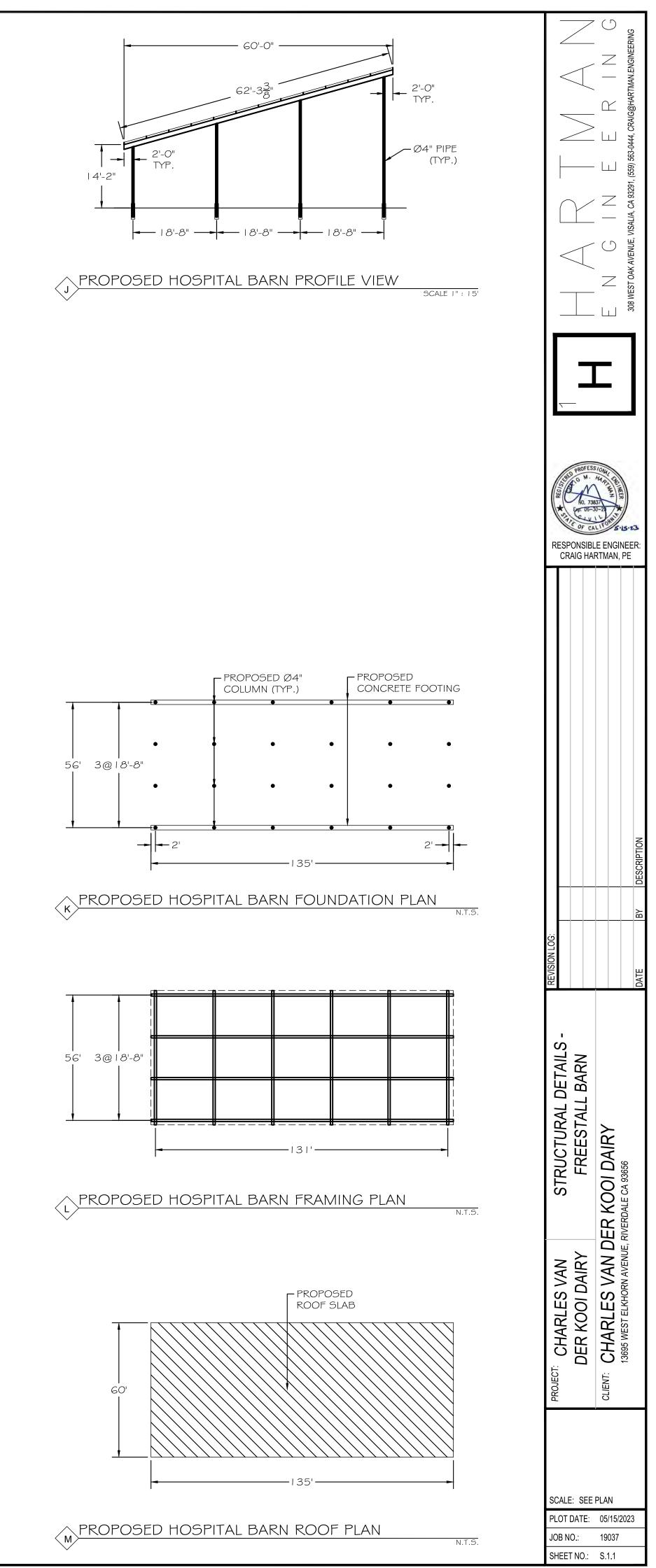




PROPOSED SAUDI STYLE BARN PROFILE VIEW

SCALE | " : | 5'





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SCALE | " : 15'



SENTRY AG SERVICES, LLC P.O. Box 7750 Visalia, CA 93290

## **Operational Statement Questions**

Van Der Kooi Family Dairy

County: Fresno County

1. Describe in detail the nature of the operation and on what is being proposed to do.

Facility is a existing permitted heifer dairy operation which site is used for the production of dairy milk, with the milk produced and hauled off-site for making of dairy products.

The dairy proposes to increase their current milk animal herd size from 3,200 to 5,000 milk cows and from 480 to 600 dry cows (heads).

In addition to the adding of a new freestall barn, hospital barn and 2 saudi-style barns.

2. How many cattle are on site? 3200 Milk, 480 dry, 2010 support

Will the proposal increase the number of cattle? Yes If so by how many? 1920

Increase of 1,800 milking and 120 dry cows. With 2,440 support.

- 3. Operational time limits: None
- 4. Number of customers or visitors: per day: 2 visit hours: 8am-5pm
- 5. Number of employees 28 . Will the proposal increase the number? Yes

Hours/shifts employees work: 6am-6pm, 6pm-6am, 5am-3pm

Do any employees live on-site? 1

SEN	SENTRY AG SERVICES, LLC P.O. Box 7750 Visalia, CA 93290
6.	Service and delivery vehicles? <u>Yes</u> number per day: <u>7</u>
7.	Road access to the site: (public or private) Private Type: (surface or paved) Paved
8.	Number of parking spaces on site: Surface type:Asphalt
9.	Are any goods to be sold on-site? <u>No</u> If so, are goods grown or produced on-site or at some other location?
10.	What equipment is used on the entire site? Loader, tractors, trucks hauling products off-site and trailers.
11.	What supplies or materials are used and how are they stored? Soaps, animal dip and oil. Items are stored in 50 gal drums.
12.	Does the use cause an unsightly appearance?
13.	List any solid or liquid wastes to be produced on-site. Describe how its stored, stored location, estimated volume, how is it hauled, where is it disposed and how often.
	Manure is spread on crops and lagoons once a month.
14.	Estimated volume of water to be used (gallons per day) Source of water:Wells



- 15. Describe any proposed advertising including size, appearance, and placement. None
- 16. Will all existing buildings continue to be used or will new buildings be constructed?

Continue to use existing buildings. With the additions of a new free stall barn, a hospital barn and 2 Saudi-sytle barns.

17. Explain which buildings or what portion of buildings will be used in the operation.

Free stall barn will be used for cow housing. Hospital barn will be used to house ill cows. The Saudi-sytle barns will be used to house fresh cows.

18. Will any outdoor lighting or an outdoor sound amplification system be used?

No

- 19. Landscaping or fencing proposed? No
- 20. Add any additional information that will provide a clear understanding of the project or operation. Please see included cover letter description the proposed project.

21. Identify all Owners.

Charles and Lynette Van Der Kooi

	r			
000		Date Received:		-
Pre-Application (Type) Amendment to Text Conditional Use Permit	Fresno County Department of F         MAILING ADDRESS:         Department of Public Works and Planning         Development Services Division         2220 Tulare St., 6 <sup>th</sup> Floor         Fresno, Ca. 93721         Director Review and Approva         Director Review and Approva         In for 2 <sup>nd</sup> Residence         Determination of Merger         or vanance       Agreements         ancy Permit       ALCC/RLCC	Also, increas heads. Also, increas	erner of Tulare & "I e: (559) 600-4497 1-800-742-101: N OF PROPOSED U IV proposes expa d install additiona increase current , for a total of 6,00 se the current dry og with the adding	1 Ext. 0-4497 SE OR REQUEST: Insion current herd Il barns. The dairy milk cow heads by 0 milk cow heads. 1 from 480 to 600 dry 1 of one free stall
No ShoovDog Leash Law General Plan Amendmen Time Extension for ECA DOCUMENTATION: PLEASE USE FILL-IN FORM and deeds as specified on	V Boundary Other NVSpecific Plan/SP Amendment) IN Initial Study PER N/A OR PRINT IN BLACK INK. Answer all question the Pre-Application Review. Attach Copy of	ns completely. Attach Deed, including Lega		
OCATION OF PROPERTY:	side of	Blad as a		
	between Howard 13695 W. Elkhorn Avenu	anu		
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#### REQUIRED FINDINGS NECESSARY FOR GRANTING A CONDITIONAL USE PERMIT APPLICATION AS SPECIFIED IN ZONING ORDINANCE SECTION 873

- That the site of the proposed use is adequate in size and shape to accommodate said use and all yards, spaces, walls and fences, parking, loading, landscaping, and other features required by this Division, to adjust said use with land and uses in the neighborhood.
- That the site for proposed use relates to streets and highways adequate in width and pavement type to carry the quantity and kind of traffic generated by the proposed use.
- That the proposed use will have no adverse effect on abutting property and surrounding neighborhood or the permitted use thereof.
- That the proposed development is consistent with the General Plan.

#### REQUIREMENTS FOR SUBMITTING SITE PLANS TO THE FRESNO COUNTY PUBLIC WORKS AND PLANNING DEPARTMENT

The purpose of the site (or plot) plan is to enable the Development Services Division to determine whether or not a proposed development conforms to Zoning Ordinance regulations. The requirements below are necessary to ensure proper and timely review based on complete information, and to prevent unnecessary delays in the processing of applications. Improper or incomplete site plans will not be accepted.

#### **General Requirements**

- The plan must be drawn on a sheet having the following minimum dimensions:
  - 18" x 24" for CUPs and SPRs
  - 8.5" x 11" for Variances and DRAs
- The plan must show the entire parcel of property described in the application. If only a portion of an existing parcel is to be developed, a key map shall be included showing the entire parcel.
- The plan must be drawn to scale, and the scale must be clearly shown. (Scale should also be large enough to adequately show required information). Parking and circulation plans must be drawn to a scale of 1"= 30', 1/32= 1', or larger.
- The plan shall be drawn so that north is at the top of the page and shall include a north arrow.
- Each plan shall be folded individually, with the bottom right• hand corner facing up. Maximum acceptable folded size shall be 8.5" x 11"

#### **Specific Information to be Shown**

- All existing and proposed building and structures, including buildings to be removed. Buildings should be labeled as either existing (E) or proposed (P).
- 2. The proposed use of all buildings and structures.
- 3. All adjacent streets and roads and their names
- Access to the property: pedestrian, vehicular, and service.
- 5. Proposed street improvements and dedications.

#### REQUIRED FINDINGS NECESSARY FOR THE GRANTING OF A VARIANCE APPLICATION AS SPECIFIED IN ZONING ORDINANCE SECTION 877

- There are exceptional or extraordinary circumstances or conditions applicable to the property involved which do not apply generally to other property in the vicinity having the identical zoning classification.
- Such variance is necessary for the preservation and enjoyment of a substantial property right of the applicant, which right is possessed by other property owners under like conditions in the vicinity having the identical zoning classification.
- The granting of a variance will not be materially detrimental to the public welfare or injurious to property and improvement in the vicinity in which the property is located.
- The granting of such variance will not be contrary to the objectives of the General Plan.

#### REQUIRED FINDINGS NECESSARY FOR THE GRANTING OF A DIRECTOR REVIEW AND APPROVALAPPLICATION AS SPECIFIED IN ZONING ORDINANCE SECTION 872

- That the site of the proposed use is adequate in size and shape to accommodate said use and all yards, spaces, walls and fences, parking, loading, landscaping and other features required by this Division, to adjust said use with land and uses in the neighborhood.
- That the site for the proposed use relates to streets and highways adequate in width and pavement type to carry the quantity and kind of traffic generated by the proposed use.
- That the proposed use will not be detrimental to the character of the development in the immediate neighborhood or the public health, safety, and general welfare.
- That the proposed development be consistent with the General Plan.
- Existing and proposed off-street parking and loading areas: location and type of paving, number of spaces (including detailed layout) and internal circulation pattern.
- Existing and proposed signs: location, type of lighting, face area (text) and height.
- Existing and proposed on-site lighting: location, type of fixtures, height and method of controlling glare and illumination.
- 9. The following measurements:
  - All dimensions of the site (or sites)
  - All dimensions of buildings and structures (including height).
  - All dimensions of off-street parking and loading areas.
  - The distance of all buildings and structures from property lines.
  - The distance between all buildings and structures.
- 10. Walls and fences: location, height and type of material.
- 11. Landscaping: location and type of plant material.
- 12. Pedestrian walkways: location, width and type of paving.
- 13. Existing wells and private sewage disposal systems.
- 14. Such other information as may be pertinent to the application.



# County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING STEVEN E. WHITE, DIRECTOR

### AGENT AUTHORIZATION

#### AUTHORIZATION OF AGENT TO ACT ON BEHALF OF PROPERTY OWNER

The Agent Authorization form is required whenever a property owner grants authority to an individual to submit and/or pursue a land use entitlement application on their behalf. This form must be completed by the property owner and submitted with the land use entitlement application to confirm that the property owner has granted authority to a representative to sign application forms on their behalf and represent them in matters related to a land use entitlement application.

The below named person is hereby authorized to act on my behalf as agent in matters related to land use entitlement applications associated with the property listed below.

## Geremy DeRuiter

Agent Name (Print or Type)

PO Box 7750

Mailing Address 559-283-4965

Phone Number

041-100-45s

Sentry Ag Services, LLC

Company Name (Print or Type) Visalia, CA 93290

City / State / Zip Code Geremyd@sentryagservices.com

Email Address 13695 W. Elkhorn Avenue

Project APN

Project Street Address

A list consisting of \_\_\_\_\_ additional properties is attached (include the APN for each property).

Project Description (Print or Type):

Allow for existing dairy to increase current milking herd size by 1,800 head and

allow construction of a new free stall barn, hospital barn, and Saudi-style barn.

The undersigned declares under penalty of perjury that they own, possess, control or manage the property referenced in this authorization and that they have the authority to designate an agent to act on behalf of all the owners of said property. The undersigned acknowledges delegation of authority to the designated agent and retains full responsibility for any and all actions this agent makes on behalf of the owner.

Cherts Van Der Rosi		4-21-2023	
Owner Signature	Date	9	
Charles Van der Kooi	909-896-6258	CVRODi 31 @ gmail.com	
Owner Name (Print or Type)	Phone Number	Email Address	

\* If the legal owner of the property is a corporation, company, partnership or LLC, provide a copy of a legal document with this authorization form showing that the individual signing this authorization form is a duly authorized partner, officer or owner of said corporation, company, partnership or LLC.

G:\4360Devs&PIn\FORMS\F410 Agent Authorization 8-14-19.doc

DEVELOPMENT SERVICES AND CAPITAL PROJECTS DIVISION 2220 Tulare Street, Sixth Floor / Fresno, California 93721 / Phone (559) 600-4497 / 600-4022 / 600-4540 / FAX 600-4200 The County of Fresno is an Equal Employment Opportunity Employer

## AGENT AUTHORIZATION

### ADDITIONAL PROPERTY LIST

# 050-160-19s

Project APN

## 050-160-13s

Project APN

## 050-160-20s

Project APN

Project APN

Project APN

Project APN

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Project Street Address

# Van Der Kooi Sign



# Milk Barn



Van Der Kooi Dairy

Page 1

## East Side



West Side

Van Der Kooi Dairy

## North Side



## South Side



Van Der Kooi Dairy

### **Heifer Corrals**



### East Side Corrals



Van Der Kooi Dairy

## Proposed Hospital Barn area



## Proposed New Freestall area



Van Der Kooi Dairy

## Proposed Saudi Barn area #1 (NE)



### Proposed Saudi Barn area #2



Van Der Kooi Dairy



September 24, 2023

Monique Baldiviez, Project Lead Sentry Ag Services, LLC P.O. Box 7750 Visalia, CA 93290

#### RE: Fresno County Dairy Expansion Air Quality / Greenhouse Gas Assessment

Dear Monique Baldiviez:

JK Consulting Group prepared the following Air Quality/Greenhouse Gas (GHG) Assessment for the proposed Dairy Expansion (Project) located in Fresno County, California. The Project, located at 13695 W. Elkhorn Avenue, Riverdale, CA, seeks to expand the number of milk cows and dry cows as well as increasing the number of barns. The proposed herd expansion would increase the current milk cow number by 1,800 head (going from 3,200 to 5,000 milking cows) and increase the dry cow number by 120 head (going from 480 to 600 dry cows), bringing the total milk/dry animal number to 5,600 heads, along with the addition of one free-stall barn, a hospital barn, and Saudi style barn to the existing dairy facility. The Project location, site, and site plan are depicted in Figures 1, 2, and 3. The 110-acre dairy facility site is located in a Fresno County AE-20 (Exclusive Agricultural, 20-acre minimum parcel size) zone.

#### **PROJECT RELATED AIR QUALITY IMPACTS**

The California Environmental Quality Act (CEQA) Guidelines, Appendix G, are used to assess the potential significance of Project impacts pursuant to local General Plan policies, Municipal Code standards, or applicable standards of other agencies. Under CEQA, air quality impacts would be considered significant if the project would:

- Air Quality
  - a) Conflict with or obstruct implementation of the applicable air quality plan?
  - b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
  - c) Expose sensitive receptors to substantial pollutant concentrations?
  - d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
- Greenhouse Gas Emissions
  - a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
  - b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Monique Baldiviez September 24, 2023 Page 2 of 18





**Project Location** 

Monique Baldiviez September 24, 2023 Page 3 of 18



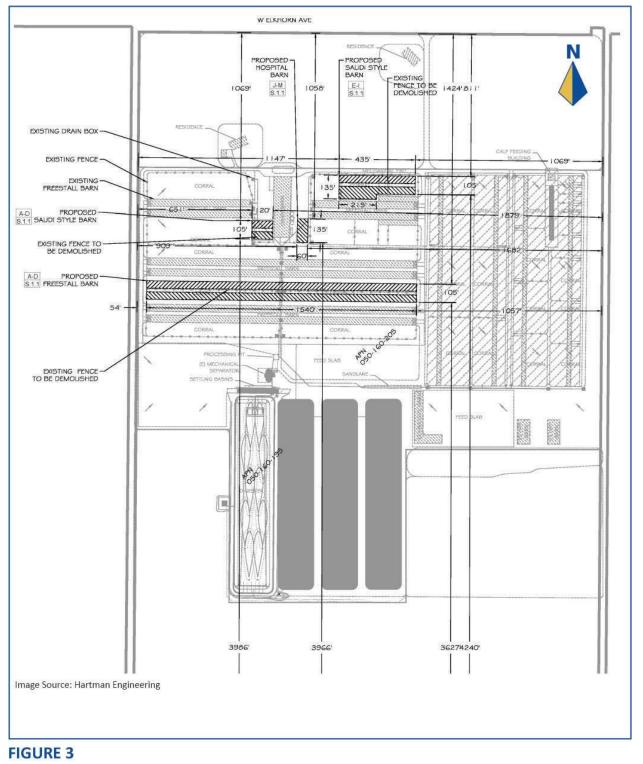


FIGURE 2 Project Site



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**Project Site Plan** 

Monique Baldiviez September 24, 2023 Page 5 of 18



#### San Joaquin Valley Air Pollution Control District Thresholds of Significance

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the agency responsible for monitoring and regulating air pollutant emissions from stationary, area, and indirect sources within Fresno County and throughout the SJVAB. The significance criteria established by the SJVAPCD for criteria pollutants, as shown in Table 1, is used for determining environmental significance. These screening criteria can be used to demonstrate that a project's total emissions would not result in a significant impact as defined by CEQA.

#### **Emission Calculation Methodology**

Air quality impacts were assessed in accordance with methodologies recommended by the California Air Resources Board (CARB) and the SJVAPCD. When criteria air pollutant quantification is required, emissions are typically modeled using the California Emissions Estimator Model (CalEEMod), version 2020.4.0. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. Project construction air emissions were primarily calculated using CalEEMod model defaults. CalEEMod Worksheets are attached to this memorandum. Dairy Emission Factors developed by the SJVAPCD were also used to quantify operational emissions associated with the Project.

#### **Air Quality Impacts**

#### a) <u>Conflict with or obstruct implementation of the applicable air quality plan?</u>

Fresno County's General Plan Policy OS-G.1 requires the County to develop standard methods for determining and mitigating project air quality impacts and related thresholds of significance for use in environmental documents and will do so in conjunction with the SJVAPCD. Pursuant to Fresno County General Plan Policy OS-G.1, consistency with the SJVAPCD's AQPs is affirmed when a project (1), does not increase the frequency or severity of an air quality standards violation or cause a new violation and (2), is consistent with the growth assumptions in the AQP's. The analysis presented below demonstrates that the Project would not result in an increase in the frequency or severity of any air quality standards violation.

• Short-Term (Construction) Impacts

The construction phase of the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone precursor pollutants (i.e., ROG and NOX) and PM10 and PM2.5. Construction-generated emissions are temporary in nature, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SJVAPCD's thresholds of significance.

Construction-generated emissions associated with the Project were calculated using the CARB and SJVAPCD approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. CalEEMod was used to estimate emissions associated with the construction of one free-stall barn, a hospital barn, and Saudi style barn

Monique Baldiviez September 24, 2023 Page 6 of 18



which are proposed to be added to the existing site. Predicted construction emissions for the Project are summarized in Table 2. As shown in Table 2, all criteria pollutant emissions would remain below their respective thresholds during Project construction. As a result, Project construction emissions would not result in an increase in the frequency or severity of any air quality standards violation and would not cause a new air quality standard violation. Therefore, mitigation is not warranted since there is a *less than significant impact* because of the Project.

• Long-Term (Operational) Impacts

Operational air pollutant emissions were based on information provided by Project representatives. Operational emissions associated with the Project were calculated using Dairy Emission Factors developed by the SJVAPCD and the CARB and SJVAPCD approved CalEEMod computer program. Predicted operational emissions for the Project are summarized in Tables 3 - 6. As shown in Table 6, all criteria pollutant emissions would remain below their respective thresholds during Project operations. As a result, Project operational emissions would not result in an increase in the frequency or severity of any air quality standards violation and would not cause a new air quality standard violation. Therefore, mitigation is not warranted since there is a *less than significant impact* because of the Project.

Prior to the issuance of a building permit, the Project shall obtain an approved SJVAPCD Authority to Construct (ATC) permit, in addition to a Dust Control Plan or Construction Notification form in compliance with Regulation VIII – Fugitive Dust PM10 Prohibitions. The animal confinement facility expansion may be subject to additional rules, including, but not limited to Rule 4570, Confined Animal Facilities, Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations), and Rule 4002 (National Emission Standards for Hazardous Air Pollutants). The Project will be required to implement measures of applicable SJVAPCD Rules and Regulations as noted.

The increase in volatile organic compounds (VOC) emissions associated with the Project would be 19.67 tons/year over existing operations considering the SJVAPCD Dairy Emission Factors. The Project would trigger New Source Review and application of Best Available Control Technology (BACT). The Project would be required to submit an ATC/Permit to Operate (PTO) application detailing an emission mitigation plan. The SJVAPCD would then consider implementation of the selected mitigation measures as conditions of the ATC permit required by District Rule 2201. The Project is also required to obtain a Title V permit since it has the potential to emit 10 tons per year of VOCs. The SJVAPCD's Title V program is described in District Rule 2520 (Federally mandated operating permits).

b) <u>Result in a cumulatively considerable net increase of any criteria pollutant for which the project region</u> <u>is non-attainment under an applicable federal or state ambient air quality standard?</u>

The Fresno County area is nonattainment for Federal and State air quality standards for ozone, in attainment of Federal standards and nonattainment for State standards for PM10, and nonattainment for Federal and State standards for PM2.5. The SJVAPCD has prepared the 2016 Plan for the 2008 8-Hour Ozone Standard, 2018 Plan for the 1997, 2006, and 2012 PM2.5 Standards, and 2007 PM10 Maintenance

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Plan to achieve Federal and State standards for improved air quality in the SJVAB regarding ozone and PM. Inconsistency with any of the plans would be considered a cumulatively adverse air quality impact. As discussed above, the Project is consistent with SJVAPCD's AQP's in that construction and operational emissions associated with the Project would not exceed established SJVAPCD emission thresholds.

Project specific emissions that exceed the thresholds of significance for criteria pollutants would be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the County is in non-attainment under applicable federal or state ambient air quality standards. It should be noted that a project isn't characterized as cumulatively insignificant when project emissions fall below thresholds of significance. As discussed above, the SJVAPCD has established thresholds of significance for determining environmental significance which are provided in Table 1.

Results of the analysis show that short-term (construction) and long-term (operational) emissions generated from the Project will be less than the applicable SJVAPCD emission thresholds for criteria pollutants. As a result, the Project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, mitigation is not warranted since there is a *less than significant impact* because of the Project.

- c) Expose sensitive receptors to substantial pollutant concentrations?
- Short-Term (Construction) Impacts

The construction phase of the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone precursor pollutants (i.e., ROG and NOX) and PM10 and PM2.5. Construction-generated emissions are temporary in nature, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SJVAPCD's thresholds of significance.

Construction-generated emissions associated with the Project were calculated using the CARB and SJVAPCD approved CalEEMod computer program. Predicted construction emissions for the Project are summarized in Table 2. As shown in Table 2, all criteria pollutant emissions would remain below their respective thresholds during Project construction. Therefore, mitigation is not warranted since there is a *less than significant impact* from Project construction emissions.

• Long-Term (Operational) Impacts

#### Criteria Pollutants

Operational air pollutant emissions were based on information provided by Project representatives Operational emissions associated with the Project were calculated using Dairy Emission Factors developed by the SJVAPCD and the CARB and SJVAPCD approved CalEEMod computer program. Predicted operational emissions for the Project are summarized in Table 6. As shown in Table 6, all criteria pollutant

Monique Baldiviez September 24, 2023 Page 8 of 18



emissions would remain below their respective thresholds during Project operations. As a result, Project operational emissions would not result in an increase in the frequency or severity of any air quality standards violation and would not cause a new air quality standard violation. Therefore, mitigation is not warranted since there is a *less than significant impact* because of the Project.

#### Toxic Air Contaminants

Most of the estimated health risk from Toxic Air Contaminants (TACs), according to the CARB California Almanac of Emissions and Air Quality (2005), can be attributable to a small number of compounds. The most significant of which is PM from diesel-fueled engines, which is known as diesel particulate matter (DPM). Diesel exhaust has hundreds of different gaseous and particulate components, many of which are harmful, and has been classified as a human carcinogen. Diesel particles are so small that they penetrate deep into the lungs. According to studies, diesel PM concentrations are significantly greater near busy intersections and roads. Heavy-duty vehicles and off-road construction equipment are main sources of diesel-related emissions. The CARB's Air Quality and Land Use Handbook (2005) provides recommendations for siting new sensitive land uses within proximity to facilities known to generate TACs, as depicted in Table 7.

The characteristics of the proposed Project are not consistent with the TAC source categories presented in Table 7. As a result, the Project would not expose sensitive receptors to toxic air emissions or generate TAC's that would have a significant impact on the environment. Therefore, mitigation is not warranted since there is a *less than significant impact* from Project operational emissions.

## d) <u>Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</u>

The likelihood that a project might produce odors should be assessed per CEQA guidelines. Any project that has the potential to regularly subject people to offensive odors should be considered to have a major impact. Nuisance odors may be assessed qualitatively taking into consideration of project design elements and proximity to off-site receptors that potentially would be exposed to objectionable odors.

The potential significance of odor emissions depends on an odor source's strength and proximity to sensitive receptors. Various facilities that have been reported to cause odors in the SJVAB have been identified by the SJVAPCD, as shown in Table 8. The characteristics of the Project are consistent with one of the facilities identified in Table 8 (Feed Lot/Dairy). However, there aren't any sensitive receptors located within one mile of the Project site. In addition, the Project is located in a very rural part of Fresno County with diaries located to the north, south, east, and west. As a result, emissions generated during Project operations would not expose sensitive receptors to objectionable odors. Therefore, mitigation is not warranted since there is a *less than significant impact* from Project operational emissions.





Pollutant	Construction Emissions tons/year	Operational Emissions (Permitted Equipment and Activities) tons/year	Operational Emissions (Non-Permitted Equipment and Activities) tons/year
Reactive Organic Gases (ROG)	10	10	10
Nitrogen Oxides (NOx)	10	10	10
Particulate Matter (PM10)	15	15	15
Particulate Matter (PM2.5)	15	15	15
Carbon Monoxide (CO)	100	100	100
Sulfur Oxides (SOx)	27	27	27
Greenhouse Gas (CO2)	None	None	None

TABLE 1 SJVAPCD SIGNIFICANCE THRESHOLDS

Source: SJVAPCD, 2023





Pollutant	Project Construction Emissions tons/year	SJVAPCD Construction Emission Threshold tons/year	Exceed SJVAPCD Threshold?		
Reactive Organic Gases (ROG)	1.8271	10	NO		
Nitrogen Oxides (NOx)	1.6827	10	NO		
Particulate Matter (PM10)	0.2174	15	NO		
Particulate Matter (PM2.5)	0.1193	15	NO		
Carbon Monoxide (CO)	2.1092	100	NO		
Sulfur Oxides (SOx)	0.0045	27	NO		
Greenhouse Gas (CO2) - Metric Tons	404.9849	None	NO		

TABLE 2 PROJECT CONSTRUCTION EMISSIONS

Source: JK Consulting Group, LLC., 2023 / CalEEM od 2020.4.0

#### TABLE 3

#### PROJECT OPERATIONAL PM10, VOC, NH3, AND H2S EMISSIONS

Type of Cow	Herd Quantity	Particulate Matter (PM10) Emission Factor Ibs/hd-yr	Volatile Organic Compounds (VOC) Emission Factor Ibs/hd-yr	Ammonia (NH3) Emission Factor Ibs/hd-yr	Hydrogen Sulfide (H2S) Emission Factor <sup>1</sup> Ibs/hd-yr
Milking Cow	1,800	1.37	21.00	74.00	1.57
Dry Cow	120	1.37	12.90	45.40	1.57
	Total Emissions (lbs/yr)	2,630.40	39,348.00	138,648.00	3,014.40
тс	OTAL EMISSIONS (tons/yr)	1.32	19.67	69.32	1.51

Source: JK Consulting Group, LLC., 2023 / SJVAPCD Dairy Emission Factors

1-H2S is typically estimated as 10% of NH3 emissions from lagoons/storage ponds.





# TABLE 4 PROJECT OPERATIONAL CH4 EMISSIONS

Type of Cow	Herd Expansion	CH4 (Anaerobic Treatment Lagoon) Ibs/hd-yr	CH4 (Manure Spreading) Ibs/hd-yr	CH4 (Solid Manure Storage) Ibs/hd-yr	CH4 (Enteric) Ibs/hd-yr
Milking Cow	1800	513.0	3.5	27.7	271.5
Dry Cow	120	513.0	3.5	27.7	271.5
CO2 Equivalent N	Aultiplier for CH4	21.0	21.0	21.0	21.0
Total CO2 Emissions (lbs/yr)		20,684,160.00	141,120.00	1,116,864.00	10,946,880.00
TOTAL CO2e EMISSIONS	(METRIC TONS)	NS) 14,918.46			

Source: JK Consulting Group, LLC., 2023 / SJVA PCD Dairy Emission Factors

1short ton = 0.9072 metric ton

#### TABLE 5 PROJECT OPERATIONAL N2O EMISSIONS

Type of Cow	Herd Expansion	N2O (Anaerobic Treatment Lagoon) Ibs/hd-yr	N2O (Manure Spreading) Ibs/hd-yr	N2O (Solid Manure Storage) Ibs/hd-yr	N2O (Enteric) Ibs/hd-yr
Milking Cow	1800	1.5	0.0	2.6	0.0
Dry Cow	120	1.5	0.0	2.6	0.0
CO2 Equivalent N	Iultiplier for N2O	310.0	310.0	310.0	310.0
Total CO2 Emissions (lbs/yr)		892,800.00	0.00	1,547,520.00	0.00
TOTAL CO2e EMISSIONS	(METRIC TONS)	IS) 1,106.93			

Source: JK Consulting Group, LLC., 2023 / SJVAPCD Dairy Emission Factors

1short ton = 0.9072 metric ton





## TABLE 6TOTAL PROJECT OPERATIONAL EMISSIONS

Pollutant	TOTAL Project Operational Emissions tons/year	SJVAPCD Operational Emission Threshold tons/year	Exceed SJVAPCD Threshold?
Reactive Organic Gases (ROG)	1.1266	10	NO
Nitrogen Oxides (NOx)	0.2740	10	NO
Particulate Matter (PM10)	1.3885	15	NO
Particulate Matter (PM2.5)	0.0319	15	NO
Carbon Monoxide (CO)	0.4027	100	NO
Sulfur Oxides (SOx)	0.0019	27	NO
Greenhouse Gas (CO2) - Metric Tons	16,084.9890	None	NO

Source: JK Consulting Group, LLC., 2023 / SJVAPCD Dairy Emission Factors / CalEEM od 2020.4.0





#### TABLE 7

#### RECOMMENDATIONS ON SITING NEW SENSITIVE LAND USES SUCH AS RESIDENCES, SCHOOLS, DAYCARE CENTERS, PLAYGROUNDS, OR MEDICAL FACILITIES\*

SOURCE CATEGORY	ADVISORY RECOMMENDATIONS
Freeways and High- Traffic Roads <sup>1</sup>	- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	<ul> <li>Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).</li> <li>Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.</li> </ul>
Rail Yards	<ul> <li>Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard.</li> <li>Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.</li> </ul>
Ports	<ul> <li>Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.</li> </ul>
Refineries	- Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	- Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	<ul> <li>Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district.</li> <li>Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations.</li> </ul>
Gasoline Dispensing Facilities	<ul> <li>Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.</li> <li>d siting new sensitive land uses within 500 feet of a freeway was identified in CARB's Air Quality and Land Use Handbook published in 2005. CARB</li> </ul>

1: The recommendation to avoid siting new sensitive land uses within 500 feet of a freeway was identified in CARB's Air Quality and Land Use Handbook published in 2005. CARB recently published a technical advisory to the Air Quality and Land Use Handbook indicating that new research has demonstrated promising strategies to reduce pollution exposure along transportation corridors.

#### \*Notes:

• These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

• Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.

• The relative risk for these categories varies greatly (see Table 1-2). To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.

These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to
 substitute for more specific information if it exists. The recommended distances take into account other factors in addition to available health risk data (see individual category
 descriptions).

• Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.

This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using perchloroethylene that can be addressed with reasonable preventative actions.

• A summary of the basis for the distance recommendations can be found in the ARB Handbook: Air Quality and Land Use Handbook: A Community Health Perspective.

Source: SJVAPCD 2023





TABLE 8
SCREENING LEVELS FOR POTENTIAL ODOR SOURCES

TYPE OF FACILITY	DISTANCE
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Compositing Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g. auto body shops)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile

Source: SJVAPCD 2023





#### **Greenhouse Gas Impacts**

#### a) <u>Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact</u> on the environment?

CARB's 2022 Scoping Plan lays forth a plan for achieving carbon neutrality goals and reducing anthropogenic GHG emissions by 85% below 1990 levels by 2045 as required by AB 1279. By implementing clean technologies and fuels, the plan's actions and results will result in significant decreases in the combustion of fossil fuels, further decreases in short-lived climate pollutants, support for sustainable development, increased action on working and natural lands to reduce emissions and sequester carbon, and the capture and storage of carbon. Even though the 2022 Scoping Plan identifies a number of concepts and initiatives that will boost the use of climate-smart agriculture management practices, at this time it does not contain any regulatory requirements that would lower greenhouse gas emissions.

#### **Emissions Estimates**

The estimated total GHG emissions during the construction phase of the Project is 404.9849 MT  $CO_2e$  as shown in Table 2 above. Construction emissions amortized over a 30-year project lifetime (estimated) yield approximately 13.5 MT  $CO_2e$  per year.

Greenhouse gases associated with operations of confined animal and agricultural activities include methane, nitrous oxide, ozone, and carbon dioxide. Several sources of these greenhouse gases are associated with animal confinement facilities: animal metabolic activity and animal housing; manure decomposition in waste deposits, treatment and storage areas, and field applied manure; on-field cultivation; fuel consumption; electricity use; and feed cultivation and transport. Total operational emissions combined with amortized construction emissions shows that the Project will generate 16,084.989 MT CO<sub>2</sub>e per year as shown in Table 6.

In 2009, the SJVAPCD adopted the guidance: *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* and the policy: *District Policy – Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*. As mandated by CEQA, the guidelines and policies rely on the application of performance-based standards, also known as Best Performance Standards (BPS), to determine project-specific greenhouse gas emissions impacts on global climate change. The use of BPS is not a required emission reduction measure; rather, it is a way to streamline the CEQA process of determining significance. Projects implementing BPS would be deemed to have a less than cumulatively significant impact.

As shown in Table 4 above, methane (CH4) emissions from manure represent the most significant source of dairy related GHG emissions (14,918.46 MT or 93% of GHG emissions). The use of dairy manure digesters is recognized as the most effective means of reducing animal-related emissions. A covered lagoon digester, which processes dairy manure, was brought online in 2016 as part of the Van Der Kooi Dairy Digester Pipeline Project. The Project will implement BPS with continued use of the exiting digester for dairy operations and is therefore considered to have a less than cumulatively significant impact.

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As a result, the Project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, mitigation is not warranted since there is a *less than significant impact* from Project operational emissions.

## b) <u>Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</u>

Senate Bill (SB) 32 sets into law the mandated reduction target in GHG emissions as written into Executive Order B-30-15. SB 32 requires that there be a reduction in GHG emissions to 40% below the 1990 levels by 2030. As set forth in the 2022 Scoping Plan, no state regulatory requirements are to go into effect prior to 2024 requiring dairy sector methane reductions to meet AB 32's 2020 reduction goals or SB 32's 2030 goals for reducing GHG emissions. The reduction of methane emissions from dairy operations will continue to be voluntary at least through 2023.

Executive Order B-30-15 establishes a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. AB 1279 (Muratsuchi) affirms California's plan to achieve net zero GHG emissions by the year 2045. In addition, the bill also mandates that statewide anthropogenic GHG emissions be reduced to at least 85% below the 1990 levels.

The 2022 Scoping Plan lays forth a plan for achieving carbon neutrality goals and reducing anthropogenic GHG emissions by 85% below 1990 levels by 2045 as required by AB 1279. By implementing clean technologies and fuels, the plan's actions and results will result in significant decreases in the combustion of fossil fuels, further decreases in short-lived climate pollutants, support for sustainable development, increased action on working and natural lands to reduce emissions and sequester carbon, and the capture and storage of carbon. Below is a list of applicable strategies in the Scoping Plan and the Project's consistency with those strategies.

- Achieve 100 percent Zero-Emission Vehicle (ZEV) sales of light-duty vehicles by 2035 and mediumheavy-duty vehicles by 2040.
  - The Project is consistent with this reduction measure. This measure cannot be implemented by a particular project or lead agency since it is a statewide measure. When this measure is implemented, standards would be applicable to light-duty and medium-heavy-duty vehicles that would access the Project. The Project would not conflict or obstruct this reduction measure.
- Accelerate the reduction and replacement of fossil fuel production and consumption in California.
  - The Project is consistent with this reduction measure. This measure cannot be implemented by a particular project or lead agency since it is a statewide measure. When this measure is implemented, standards would be applicable to light-duty and medium-heavy-duty vehicles that

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would access the commercial/retail development. The Project would not conflict or obstruct this reduction measure.

While the dairy and livestock sectors have made significant progress towards reducing methane emissions as set forth by the CARB in the recent *Analysis of Progress Toward Achieving the 2030 Diary and Livestock Sector Methane Emissions Target*, March 2022, methane emissions must be reduced significantly in order to meet the 2030 target of 40 percent below 2013 levels. Installing an anaerobic digester and utilizing alternative manure management techniques are two of the report's key recommendations for lowering manure methane emissions. A covered lagoon digester, which processes dairy manure, was brought online in 2016 as part of the Van Der Kooi Dairy Digester Pipeline Project. With the continued use of the exiting digester for dairy operations, the Project will utilize one of the key recommendations for lowering manure methane emissions.

The Project will not Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, mitigation is not warranted since there is a *less than significant impact* from Project operational emissions.

#### **SUMMARY**

The significance criteria established by the SJVAPCD for criteria pollutants, as shown in Table 1, is used for determining environmental significance. These screening criteria can be used to demonstrate that a project's total emissions would not result in a significant impact as defined by CEQA. As discussed above, the Project will have a less than significant impact on the environment as it relates to Air Quality and GHG emissions. The Project is, however, subject to various SJVAPCD Regulations such as:

#### District Regulation VIII (Fugitive PM10 Prohibition)

The purpose of Regulation VIII (Reg. VIII) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. Reg. VIII requires property owners, contractors, developers, equipment operators, farmers and public agencies to control fugitive dust emissions from specified outdoor fugitive dust sources. It specifies the following measures to control fugitive dust:

- Apply water to unpaved surfaces and area.
- Use non-toxic chemical or organic dust suppressants on unpaved roads and traffic areas.
- Limit or reduce vehicle speed on unpaved roads and traffic areas.
- Maintain areas in a stabilized condition by restricting vehicle access.
- Install wind barriers.
- During high winds, cease outdoor activities that disturb the soil.
- Keep bulk materials sufficiently wet when handling.
- Store and handle materials in a three-sided structure.
- When storing bulk materials, apply water to the surface or cover the storage pile with a tarp.
- Don't overload haul trucks. Overloaded trucks are likely to spill bulk materials.

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- Cover haul trucks with a tarp or other suitable cover. Or, wet the top of the load enough to limit visible dust emissions.
- Clean the interior of cargo compartments on emptied haul trucks prior to leaving a site.
- Prevent trackout by installing a trackout control device.
- Clean up trackout at least once a day. If along a busy road or highway, clean up trackout immediately.
- Monitor dust-generating activities and implement appropriate measures for maximum dust control.

Should you have any further questions or comments, please contact me by phone at (559) 246-4204 or by email at jellard@jkconsultinggroupllc.com.

Sincerely,

Jason Ellard, Principal JK Consulting Group

Attachment



CALEEMOD WORKSHEETS

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### Van Der Kooi Family Dairy

Fresno County, Annual

#### **1.0 Project Characteristics**

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	234.53	1000sqft	5.38	234,525.00	0

#### **1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	45
Climate Zone	3			Operational Year	2025
Utility Company	Pacific Gas and Electric C	ompany			
CO2 Intensity (Ib/MWhr)	203.98	CH4 Intensity (Ib/MWhr)	0.033	N2O Intensity (Ib/MWhr)	0.004

#### 1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Vehicle Trips - Hillcrest Dairy Expansion Project (Addition of 1700 animals) showed a 4.38% increase in trips as a result of the expansion. 4.38% was applied to default Heavy Industrial Trip Rates

Land Use Change -

Table Name	Column Name	Default Value	New Value
tblVehicleTrips	ST_TR	6.42	0.28
tblVehicleTrips	SU_TR	5.09	0.22
tblVehicleTrips	WD_TR	3.93	0.17

#### 2.0 Emissions Summary

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not 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	7/yr		
2023	0.0773	0.7276	0.6733	1.4000e- 003	0.1848	0.0326	0.2174	0.0890	0.0303	0.1193	0.0000	123.2858	123.2858	0.0303	1.6100e- 003	124.5231
2024	1.8281	1.6827	2.1092	4.5000e- 003	0.1103	0.0700	0.1802	0.0299	0.0658	0.0957	0.0000	399.5037	399.5037	0.0653	0.0129	404.9849
Maximum	1.8281	1.6827	2.1092	4.5000e- 003	0.1848	0.0700	0.2174	0.0890	0.0658	0.1193	0.0000	399.5037	399.5037	0.0653	0.0129	404.9849

#### 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					ton	s/yr							МТ	ī/yr		
2023	0.0773	0.7276	0.6733	1.4000e- 003	0.1848	0.0326	0.2174	0.0890	0.0303	0.1193	0.0000	123.2857	123.2857	0.0303	1.6100e- 003	124.5229
2024	1.8281	1.6827	2.1092	4.5000e- 003	0.1103	0.0700	0.1802	0.0299	0.0658	0.0957	0.0000	399.5033	399.5033	0.0653	0.0129	404.9846
Maximum	1.8281	1.6827	2.1092	4.5000e- 003	0.1848	0.0700	0.2174	0.0890	0.0658	0.1193	0.0000	399.5033	399.5033	0.0653	0.0129	404.9846

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	со	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	9-19-2023	12-18-2023	0.7238	0.7238
2	12-19-2023	3-18-2024	0.5623	0.5623
3	3-19-2024	6-18-2024	0.5605	0.5605
4	6-19-2024	9-18-2024	0.5600	0.5600
5	9-19-2024	9-30-2024	0.0730	0.0730
		Highest	0.7238	0.7238

#### 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			<u>.</u>		tor	ns/yr			·				M	ſ/yr	<u>.</u>		
Area	1.0792	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003	
Energy	0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	445.8931	445.8931	0.0352	8.4100e- 003	449.2800	
Mobile	0.0213	0.0360	0.2006	4.9000e- 004	0.0500	4.0000e- 004	0.0504	0.0134	3.8000e- 004	0.0138	0.0000	45.3007	45.3007	2.3400e- 003	2.4800e- 003	<mark>46.0995</mark>	Only inclu emis
Waste						0.0000	0.0000		0.0000	0.0000	59.0338	0.0000	59.0338	3.4888	0.0000	146.2538	
Water						0.0000	0.0000		0.0000	0.0000	17.2063	27.1526	44.3589	1.7716	0.0423	101.2437	
Total	1.1266	0.2740	0.4027	1.9200e- 003	0.0500	0.0185	0.0685	0.0134	0.0185	0.0319	76.2401	518.3506	594.5907	5.2980	0.0532	742.8815	

Only mobile emissions ncluded in Total Project emissions for GHG.

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not 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					ton	ıs/yr							ΜT	/yr		
Area	1.0792	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003
Energy	0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	445.8931	445.8931	0.0352	8.4100e- 003	449.2800
Mobile	0.0213	0.0360	0.2006	4.9000e- 004	0.0500	4.0000e- 004	0.0504	0.0134	3.8000e- 004	0.0138	0.0000	45.3007	45.3007	2.3400e- 003	2.4800e- 003	46.0995
Waste						0.0000	0.0000		0.0000	0.0000	59.0338	0.0000	59.0338	3.4888	0.0000	146.2538
Water						0.0000	0.0000		0.0000	0.0000	17.2063	27.1526	44.3589	1.7716	0.0423	101.2437
Total	1.1266	0.2740	0.4027	1.9200e- 003	0.0500	0.0185	0.0685	0.0134	0.0185	0.0319	76.2401	518.3506	594.5907	5.2980	0.0532	742.8815

	ROG	NOx	со	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

### 3.0 Construction Detail

#### **Construction Phase**

	Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1		Demolition	Demolition	9/19/2023	10/16/2023	5	20	
2	1		Site Preparation	10/17/2023	10/30/2023	5	10	
3		Grading	Grading	10/31/2023	11/27/2023	5	20	

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Building Construction	Building Construction	11/28/2023	10/14/2024	5	230	
5	Paving	Paving	10/15/2024	11/11/2024	5	20	
	Architectural Coating	Architectural Coating	11/12/2024	12/9/2024	5	20	

Acres of Grading (Site Preparation Phase): 15

Acres of Grading (Grading Phase): 20

#### Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 351,788; Non-Residential Outdoor: 117,263; Striped Parking Area: 0 (Architectural Coating – sqft)

#### **OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	7.00	231	0.29
Demolition	Excavators	3	8.00	158	0.38
Grading	Excavators	1	8.00	158	0.38
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Grading	Graders	1	8.00	187	0.41
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
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Grading	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Building Construction	Welders	1	8.00	46	0.45
		:			

#### Trips and VMT

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
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	99.00	38.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

#### 3.1 Mitigation Measures Construction

#### 3.2 Demolition - 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					ton	s/yr							MT	ī/yr		
Off-Road	0.0227	0.2148	0.1964	3.9000e- 004		9.9800e- 003	9.9800e- 003		9.2800e- 003	9.2800e- 003	0.0000	33.9921	33.9921	9.5200e- 003	0.0000	34.2301
Total	0.0227	0.2148	0.1964	3.9000e- 004		9.9800e- 003	9.9800e- 003		9.2800e- 003	9.2800e- 003	0.0000	33.9921	33.9921	9.5200e- 003	0.0000	34.2301

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### 3.2 Demolition - 2023

#### Unmitigated Construction Off-Site

	ROG	NOx	СО	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					ton	s/yr							MT	7/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	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519
Total	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519

#### **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					ton	s/yr							MT	7/yr		
Off-Road	0.0227	0.2148	0.1964	3.9000e- 004		9.9800e- 003	9.9800e- 003		9.2800e- 003	9.2800e- 003	0.0000	33.9920	33.9920	9.5200e- 003	0.0000	34.2300
Total	0.0227	0.2148	0.1964	3.9000e- 004		9.9800e- 003	9.9800e- 003		9.2800e- 003	9.2800e- 003	0.0000	33.9920	33.9920	9.5200e- 003	0.0000	34.2300

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### 3.2 Demolition - 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					ton	s/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	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519
Total	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519

#### 3.3 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					ton	s/yr							MT	7/yr		
Fugitive Dust					0.0983	0.0000	0.0983	0.0505	0.0000	0.0505	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0133	0.1376	0.0912	1.9000e- 004		6.3300e- 003	6.3300e- 003		5.8200e- 003	5.8200e- 003	0.0000	16.7254	16.7254	5.4100e- 003	0.0000	16.8606
Total	0.0133	0.1376	0.0912	1.9000e- 004	0.0983	6.3300e- 003	0.1046	0.0505	5.8200e- 003	0.0563	0.0000	16.7254	16.7254	5.4100e- 003	0.0000	16.8606

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### 3.3 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					ton	s/yr							MT	7/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	2.8000e- 004	1.8000e- 004	2.1200e- 003	1.0000e- 005	7.2000e- 004	0.0000	7.2000e- 004	1.9000e- 004	0.0000	1.9000e- 004	0.0000	0.5659	0.5659	2.0000e- 005	2.0000e- 005	0.5712
Total	2.8000e- 004	1.8000e- 004	2.1200e- 003	1.0000e- 005	7.2000e- 004	0.0000	7.2000e- 004	1.9000e- 004	0.0000	1.9000e- 004	0.0000	0.5659	0.5659	2.0000e- 005	2.0000e- 005	0.5712

#### **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					ton	s/yr							MT	∵/yr		
Fugitive Dust					0.0983	0.0000	0.0983	0.0505	0.0000	0.0505	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0133	0.1376	0.0912	1.9000e- 004		6.3300e- 003	6.3300e- 003		5.8200e- 003	5.8200e- 003	0.0000	16.7253	16.7253	5.4100e- 003	0.0000	16.8606
Total	0.0133	0.1376	0.0912	1.9000e- 004	0.0983	6.3300e- 003	0.1046	0.0505	5.8200e- 003	0.0563	0.0000	16.7253	16.7253	5.4100e- 003	0.0000	16.8606

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### 3.3 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					ton	s/yr							MT	7/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	2.8000e- 004	1.8000e- 004	2.1200e- 003	1.0000e- 005	7.2000e- 004	0.0000	7.2000e- 004	1.9000e- 004	0.0000	1.9000e- 004	0.0000	0.5659	0.5659	2.0000e- 005	2.0000e- 005	0.5712
Total	2.8000e- 004	1.8000e- 004	2.1200e- 003	1.0000e- 005	7.2000e- 004	0.0000	7.2000e- 004	1.9000e- 004	0.0000	1.9000e- 004	0.0000	0.5659	0.5659	2.0000e- 005	2.0000e- 005	0.5712

#### 3.4 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					ton	s/yr							MT	∵/yr		
Fugitive Dust					0.0708	0.0000	0.0708	0.0343	0.0000	0.0343	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0171	0.1794	0.1475	3.0000e- 004		7.7500e- 003	7.7500e- 003		7.1300e- 003	7.1300e- 003	0.0000	26.0606	26.0606	8.4300e- 003	0.0000	26.2713
Total	0.0171	0.1794	0.1475	3.0000e- 004	0.0708	7.7500e- 003	0.0786	0.0343	7.1300e- 003	0.0414	0.0000	26.0606	26.0606	8.4300e- 003	0.0000	26.2713

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### 3.4 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					ton	s/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	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519
Total	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519

#### **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					ton	s/yr							MT	ī/yr		
Fugitive Dust					0.0708	0.0000	0.0708	0.0343	0.0000	0.0343	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0171	0.1794	0.1475	3.0000e- 004		7.7500e- 003	7.7500e- 003		7.1300e- 003	7.1300e- 003	0.0000	26.0606	26.0606	8.4300e- 003	0.0000	26.2713
Total	0.0171	0.1794	0.1475	3.0000e- 004	0.0708	7.7500e- 003	0.0786	0.0343	7.1300e- 003	0.0414	0.0000	26.0606	26.0606	8.4300e- 003	0.0000	26.2713

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### 3.4 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					ton	s/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	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519
Total	4.6000e- 004	3.0000e- 004	3.5400e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9431	0.9431	3.0000e- 005	3.0000e- 005	0.9519

#### 3.5 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	0.0189	0.1726	0.1949	3.2000e- 004		8.4000e- 003	8.4000e- 003		7.9000e- 003	7.9000e- 003	0.0000	27.8166	27.8166	6.6200e- 003	0.0000	27.9820
Total	0.0189	0.1726	0.1949	3.2000e- 004		8.4000e- 003	8.4000e- 003		7.9000e- 003	7.9000e- 003	0.0000	27.8166	27.8166	6.6200e- 003	0.0000	27.9820

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 3.5 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					ton	s/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	4.9000e- 004	0.0200	6.0000e- 003	9.0000e- 005	3.0200e- 003	1.3000e- 004	3.1500e- 003	8.7000e- 004	1.2000e- 004	1.0000e- 003	0.0000	8.7701	8.7701	5.0000e- 005	1.3200e- 003	9.1646
Worker	3.6800e- 003	2.3800e- 003	0.0280	8.0000e- 005	9.5000e- 003	5.0000e- 005	9.5400e- 003	2.5200e- 003	4.0000e- 005	2.5700e- 003	0.0000	7.4692	7.4692	2.3000e- 004	2.2000e- 004	7.5394
Total	4.1700e- 003	0.0224	0.0340	1.7000e- 004	0.0125	1.8000e- 004	0.0127	3.3900e- 003	1.6000e- 004	3.5700e- 003	0.0000	16.2392	16.2392	2.8000e- 004	1.5400e- 003	16.7040

#### 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					ton	s/yr							MT	7/yr		
Off-Road	0.0189	0.1726	0.1949	3.2000e- 004		8.4000e- 003	8.4000e- 003		7.9000e- 003	7.9000e- 003	0.0000	27.8165	27.8165	6.6200e- 003	0.0000	27.9820
Total	0.0189	0.1726	0.1949	3.2000e- 004		8.4000e- 003	8.4000e- 003		7.9000e- 003	7.9000e- 003	0.0000	27.8165	27.8165	6.6200e- 003	0.0000	27.9820

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 3.5 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					ton	s/yr							MT	7/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	4.9000e- 004	0.0200	6.0000e- 003	9.0000e- 005	3.0200e- 003	1.3000e- 004	3.1500e- 003	8.7000e- 004	1.2000e- 004	1.0000e- 003	0.0000	8.7701	8.7701	5.0000e- 005	1.3200e- 003	9.1646
Worker	3.6800e- 003	2.3800e- 003	0.0280	8.0000e- 005	9.5000e- 003	5.0000e- 005	9.5400e- 003	2.5200e- 003	4.0000e- 005	2.5700e- 003	0.0000	7.4692	7.4692	2.3000e- 004	2.2000e- 004	7.5394
Total	4.1700e- 003	0.0224	0.0340	1.7000e- 004	0.0125	1.8000e- 004	0.0127	3.3900e- 003	1.6000e- 004	3.5700e- 003	0.0000	16.2392	16.2392	2.8000e- 004	1.5400e- 003	16.7040

## 3.5 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					ton	s/yr							MT	∵/yr		
Off-Road	0.1516	1.3847	1.6652	2.7800e- 003		0.0632	0.0632		0.0594	0.0594	0.0000	238.8046	238.8046	0.0565	0.0000	240.2163
Total	0.1516	1.3847	1.6652	2.7800e- 003		0.0632	0.0632		0.0594	0.0594	0.0000	238.8046	238.8046	0.0565	0.0000	240.2163

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

# 3.5 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					ton	s/yr							MT	7/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	4.0900e- 003	0.1720	0.0503	7.7000e- 004	0.0260	1.1100e- 003	0.0271	7.5000e- 003	1.0600e- 003	8.5600e- 003	0.0000	73.9916	73.9916	3.9000e- 004	0.0111	77.3204
Worker	0.0292	0.0180	0.2217	6.8000e- 004	0.0815	3.7000e- 004	0.0819	0.0217	3.4000e- 004	0.0220	0.0000	61.9996	61.9996	1.7600e- 003	1.7200e- 003	62.5558
Total	0.0333	0.1900	0.2720	1.4500e- 003	0.1075	1.4800e- 003	0.1090	0.0292	1.4000e- 003	0.0306	0.0000	135.9912	135.9912	2.1500e- 003	0.0129	139.8761

#### 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					ton	s/yr							MT	/yr		
Off-Road	0.1516	1.3847	1.6652	2.7800e- 003		0.0632	0.0632		0.0594	0.0594	0.0000	238.8043	238.8043	0.0565	0.0000	240.2161
Total	0.1516	1.3847	1.6652	2.7800e- 003		0.0632	0.0632		0.0594	0.0594	0.0000	238.8043	238.8043	0.0565	0.0000	240.2161

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 3.5 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					ton	s/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	4.0900e- 003	0.1720	0.0503	7.7000e- 004	0.0260	1.1100e- 003	0.0271	7.5000e- 003	1.0600e- 003	8.5600e- 003	0.0000	73.9916	73.9916	3.9000e- 004	0.0111	77.3204
Worker	0.0292	0.0180	0.2217	6.8000e- 004	0.0815	3.7000e- 004	0.0819	0.0217	3.4000e- 004	0.0220	0.0000	61.9996	61.9996	1.7600e- 003	1.7200e- 003	62.5558
Total	0.0333	0.1900	0.2720	1.4500e- 003	0.1075	1.4800e- 003	0.1090	0.0292	1.4000e- 003	0.0306	0.0000	135.9912	135.9912	2.1500e- 003	0.0129	139.8761

## 3.6 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					ton	s/yr							MT	⁻/yr		
Off-Road	9.8800e- 003	0.0953	0.1463	2.3000e- 004		4.6900e- 003	4.6900e- 003		4.3100e- 003	4.3100e- 003	0.0000	20.0265	20.0265	6.4800e- 003	0.0000	20.1885
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	9.8800e- 003	0.0953	0.1463	2.3000e- 004		4.6900e- 003	4.6900e- 003		4.3100e- 003	4.3100e- 003	0.0000	20.0265	20.0265	6.4800e- 003	0.0000	20.1885

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 3.6 Paving - 2024

## Unmitigated Construction Off-Site

	ROG	NOx	СО	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					ton	s/yr							MT	7/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	4.3000e- 004	2.7000e- 004	3.2600e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9120	0.9120	3.0000e- 005	3.0000e- 005	0.9202
Total	4.3000e- 004	2.7000e- 004	3.2600e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9120	0.9120	3.0000e- 005	3.0000e- 005	0.9202

#### **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					ton	s/yr							MT	7/yr		
Off-Road	9.8800e- 003	0.0953	0.1463	2.3000e- 004		4.6900e- 003	4.6900e- 003		4.3100e- 003	4.3100e- 003	0.0000	20.0265	20.0265	6.4800e- 003	0.0000	20.1884
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	9.8800e- 003	0.0953	0.1463	2.3000e- 004		4.6900e- 003	4.6900e- 003		4.3100e- 003	4.3100e- 003	0.0000	20.0265	20.0265	6.4800e- 003	0.0000	20.1884

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 3.6 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					ton	s/yr							MT	7/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	4.3000e- 004	2.7000e- 004	3.2600e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9120	0.9120	3.0000e- 005	3.0000e- 005	0.9202
Total	4.3000e- 004	2.7000e- 004	3.2600e- 003	1.0000e- 005	1.2000e- 003	1.0000e- 005	1.2000e- 003	3.2000e- 004	1.0000e- 005	3.2000e- 004	0.0000	0.9120	0.9120	3.0000e- 005	3.0000e- 005	0.9202

## 3.7 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					ton	s/yr							MT	7/yr		
Archit. Coating	1.6305					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.8100e- 003	0.0122	0.0181	3.0000e- 005		6.1000e- 004	6.1000e- 004		6.1000e- 004	6.1000e- 004	0.0000	2.5533	2.5533	1.4000e- 004	0.0000	2.5569
Total	1.6324	0.0122	0.0181	3.0000e- 005		6.1000e- 004	6.1000e- 004		6.1000e- 004	6.1000e- 004	0.0000	2.5533	2.5533	1.4000e- 004	0.0000	2.5569

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 3.7 Architectural Coating - 2024 Unmitigated Construction Off-Site

	ROG	NOx	СО	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					ton	s/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	5.7000e- 004	3.5000e- 004	4.3500e- 003	1.0000e- 005	1.6000e- 003	1.0000e- 005	1.6100e- 003	4.2000e- 004	1.0000e- 005	4.3000e- 004	0.0000	1.2160	1.2160	3.0000e- 005	3.0000e- 005	1.2269
Total	5.7000e- 004	3.5000e- 004	4.3500e- 003	1.0000e- 005	1.6000e- 003	1.0000e- 005	1.6100e- 003	4.2000e- 004	1.0000e- 005	4.3000e- 004	0.0000	1.2160	1.2160	3.0000e- 005	3.0000e- 005	1.2269

#### 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					ton	s/yr							MT	7/yr		
Archit. Coating	1.6305					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.8100e- 003	0.0122	0.0181	3.0000e- 005		6.1000e- 004	6.1000e- 004		6.1000e- 004	6.1000e- 004	0.0000	2.5533	2.5533	1.4000e- 004	0.0000	2.5568
Total	1.6324	0.0122	0.0181	3.0000e- 005		6.1000e- 004	6.1000e- 004		6.1000e- 004	6.1000e- 004	0.0000	2.5533	2.5533	1.4000e- 004	0.0000	2.5568

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

# 3.7 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					ton	s/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	5.7000e- 004	3.5000e- 004	4.3500e- 003	1.0000e- 005	1.6000e- 003	1.0000e- 005	1.6100e- 003	4.2000e- 004	1.0000e- 005	4.3000e- 004	0.0000	1.2160	1.2160	3.0000e- 005	3.0000e- 005	1.2269
Total	5.7000e- 004	3.5000e- 004	4.3500e- 003	1.0000e- 005	1.6000e- 003	1.0000e- 005	1.6100e- 003	4.2000e- 004	1.0000e- 005	4.3000e- 004	0.0000	1.2160	1.2160	3.0000e- 005	3.0000e- 005	1.2269

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 4.0 Operational Detail - Mobile

## 4.1 Mitigation Measures Mobile

	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					ton	s/yr							MT	⁻/yr		
Mitigated	0.0213	0.0360	0.2006	4.9000e- 004	0.0500	4.0000e- 004	0.0504	0.0134	3.8000e- 004	0.0138	0.0000	45.3007	45.3007	2.3400e- 003	2.4800e- 003	46.0995
Unmitigated	0.0213	0.0360	0.2006	4.9000e- 004	0.0500	4.0000e- 004	0.0504	0.0134	3.8000e- 004	0.0138	0.0000	45.3007	45.3007	2.3400e- 003	2.4800e- 003	46.0995

## 4.2 Trip Summary Information

	Ave	rage Daily Trip Ra	te	Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	40.34	65.90	52.25	133,396	133,396
Total	40.34	65.90	52.25	133,396	133,396

## 4.3 Trip Type Information

		Miles			Trip %			Trip Purpos	e %
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
General Heavy Industry	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3

## 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.521458	0.053308	0.175656	0.151963	0.025001	0.006656	0.014407	0.022718	0.000702	0.000287	0.023515	0.001463	0.002865

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not 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					ton	s/yr							МТ	/yr		
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	186.8296	186.8296	0.0302	3.6600e- 003	188.6770
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	186.8296	186.8296	0.0302	3.6600e- 003	188.6770
NaturalGas Mitigated	0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	259.0636	259.0636	4.9700e- 003	4.7500e- 003	260.6030
NaturalGas Unmitigated	0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	259.0636	259.0636	4.9700e- 003	4.7500e- 003	260.6030

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 5.2 Energy by Land Use - NaturalGas

<u>Unmitigated</u>

	NaturalGa s 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					ton	s/yr							МТ	/yr		
General Heavy Industry	4.85467e +006	0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	259.0636	259.0636	4.9700e- 003	4.7500e- 003	260.6030
Total		0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	259.0636	259.0636	4.9700e- 003	4.7500e- 003	260.6030

## **Mitigated**

	NaturalGa s 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					ton	s/yr							МТ	/yr		
General Heavy Industry	4.85467e +006	0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	259.0636	259.0636	4.9700e- 003	4.7500e- 003	260.6030
Total		0.0262	0.2380	0.1999	1.4300e- 003		0.0181	0.0181		0.0181	0.0181	0.0000	259.0636	259.0636	4.9700e- 003	4.7500e- 003	260.6030

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

<u>Unmitigated</u>

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		MT	⊺/yr	
General Heavy Industry	2.01926e +006	186.8296	0.0302	3.6600e- 003	188.6770
Total		186.8296	0.0302	3.6600e- 003	188.6770

## **Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		MT	/yr	
General Heavy Industry	2.01926e +006	186.8296	0.0302	3.6600e- 003	188.6770
Total		186.8296	0.0302	3.6600e- 003	188.6770

## 6.0 Area Detail

6.1 Mitigation Measures Area

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not 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	1.0792	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003
Unmitigated	1.0792	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003

## 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	0.1631					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9159					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e- 004	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003
Total	1.0792	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not 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					ton	s/yr							MT	∵/yr		
Architectural Coating	0.1631					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9159					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.0000e- 004	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003
Total	1.0792	2.0000e- 005	2.1500e- 003	0.0000		1.0000e- 005	1.0000e- 005		1.0000e- 005	1.0000e- 005	0.0000	4.1900e- 003	4.1900e- 003	1.0000e- 005	0.0000	4.4600e- 003

## 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 Not Applied

	Total CO2	CH4	N2O	CO2e				
Category	MT/yr							
Mitigated	44.3589	1.7716	0.0423	101.2437				
	44.3589	1.7716	0.0423	101.2437				

# 7.2 Water by Land Use <u>Unmitigated</u>

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e		
Land Use	Mgal	MT/yr					
General Heavy Industry	54.2351 / 0	44.3589	1.7716	0.0423	101.2437		
Total		44.3589	1.7716	0.0423	101.2437		

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

#### 7.2 Water by Land Use

#### **Mitigated**

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e			
Land Use	Mgal	MT/yr						
General Heavy Industry	54.2351 / 0	44.3589	1.7716	0.0423	101.2437			
Total		44.3589	1.7716	0.0423	101.2437			

## 8.0 Waste Detail

## 8.1 Mitigation Measures Waste

## Category/Year

	Total CO2	CH4	N2O	CO2e					
	MT/yr								
Mitigated	59.0338	3.4888	0.0000	146.2538					
Unmitigated	59.0338	3.4888	0.0000	146.2538					

#### EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## 8.2 Waste by Land Use

**Unmitigated** 

	Waste Disposed	Total CO2	CH4	N2O	CO2e				
Land Use	tons	MT/yr							
General Heavy Industry	290.82	59.0338	3.4888	0.0000	146.2538				
Total		59.0338	3.4888	0.0000	146.2538				

## **Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e				
Land Use	tons	MT/yr							
General Heavy Industry	290.82	59.0338	3.4888	0.0000	146.2538				
Total		59.0338	3.4888	0.0000	146.2538				

## 9.0 Operational Offroad

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

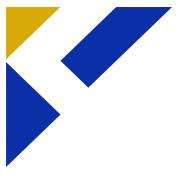
## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

## **10.0 Stationary Equipment**

## Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
<u>Boilers</u>						
Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type	
User Defined Equipment						
Equipment Type	Number					
11.0 Vegetation						

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PAS Facility Portal

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MODIFICATION OF COW HOU 10 SUPPORT STOCK (HEIFER NUMBERS OF COWS TO 3,20 SUPPORT STOCK CONSISTIN MAXIMUM OF 18 NEW OPEN	S AND E 0 MILK C 1G OF 2,	BULLS); A COWS NO 060 HEIF	ND 6 FRE OT TO EXC ERS AND	ESTALL CEED A C BULLS,	BARNS W COMBINED AND 380 C	ITH A FLU	JSH/SCR. )F 3,680 M	APE SYSTEM	M: INCREASE MAXIMUM WS (MILK AND DRY); 2,4	40
Expires on: 12/31/	2024		-							
Last Changed: 03/20/	Contraction of the local division of the loc						<u>.</u>			
Fee Rule: 3020-0	6									
View: Emissions	*									
Description	NOX	SOX	PM10	CO	voc	PM2.5	1			
Potential to Emit (lb/Yr)	0	0	11857	0	43319					
Daily Emissions Limit (lb/Day)	0	0	32.4	0	118.6					

PAS Facility Portal

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10 SUP NUMBE SUPPO	PORT STOCK (HEIFERS AND BULLS); A RS OF COWS TO 3,200 MILK COWS NO	K COWS NOT TO EXCEED A COMBINED TOTAL OF 3,430 MAT AND 6 FREESTALL BARNS WITH A FLUSH/SCRAPE SYSTEM: I DT TO EXCEED A COMBINED TOTAL OF 3,680 MATURE COWS ERS AND BULLS, AND 380 CALVES HOUSED IN OPEN CORR/ SHADE STRUCTURES	NCREASE MAXIMUM (MILK AND DRY); 2,440
Expires o Last Cha Fee Rule	anged: 03/20/2019 e: 3020-06	3	
/iew:	Conditions		Rule
Jonania		entials, a permittee shall allow an authorized representative of the	rue
1	District to enter the permittee's premise	es where a permitted source is located or emissions related must be kept under condition of the permit.	District Rule 1070
2		entials, a permittee shall allow an authorized representative of the reasonable times, any records that must be kept under the	District Rule 1070
3		ation of any conditions established for this facility in the Use Permit (SUP), Site Approval, Site Plan Review (SPR), or local, state, or federal agency.	Public Resources Code 21000 21177: California Environmenta Quality Act
4	If a licensed veterinarian or a certified r required to be suspended as a detrime owners/operators must notify the Distri including the duration and the specific suspended. If the situation is expected	nutritionist determines that any VOC mitigation measure will be nt to animal health or necessary for the animal to molt, the ct in writing within forty-eight (48) hours of the determination health condition requiring the mitigation measure to be to exist longer than a thirty-day (30) period, the owner/operator plan designating a mitigation measure to be implemented in lieu	District Rule 4570
5		ing to National Research Council (NRC) guidelines.	District Rule 2201
6	demonstrate compliance with National	d content, formulation, and quantity of feed additive utilized, to Research Council (NRC) guidelines. Records such as feed ags), ration sheets, or feed purchase records may be used to meet	District Rule 2201
7		idth of at least 8 feet along the housing side of the feedlane fence ng the housing side of the feedlane fence for heifers/bulls.	District Rules 2201 and 4570
8		times per day for mature cows and at least once per day for	District Rules 2201 and 4570
9		ent to demonstrate that lanes are flushed at least four times per per day for heifers/bulls.	District Rules 2201 and 4570
10		not dry from individual cow freestall beds or shall rake, harrow,	District Rules 2201 and 4570

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11	Permittee shall record either of the following: 1) the dates when manure that is not dry is removed from individual cow freestall beds or 2) the dates when the freestall bedding is raked, harrowed, scraped, or graded.	District Rules 2201 and 457
12	Permittee shall inspect water pipes and troughs and repair leaks at least once every seven (7) days.	District Rules 2201 and 457
13	Permittee shall maintain records demonstrating that water pipes and troughs are inspected and leaks are repaired at least once every seven (7) days.	District Rules 2201 and 457
14	Permittee shall clean manure from corrals at least four (4) times per year with at least sixty (60) days between each cleaning, or permittee shall clean corrals at least once between April and July and at least once between September and December.	District Rules 2201 and 457
15	Permittee shall demonstrate that manure from corrals are cleaned at least four (4) times per year with at least sixty (60) days between each cleaning or demonstrate that corrals are cleaned at least once between April and July and at least once between September and December.	District Rules 2201 and 457
16	Permittee shall implement at least one of the following exercise pen and corral mitigation measures: 1) slope the surface of the exercise pens and corrals at least 3% where the available space for each animal is 400 square feet or less and at least 1.5% where the available space for each animal is more than 400 square feet; 2) maintain exercise pens and corrals to ensure proper drainage preventing water from standing more than forty-eight hours; or 3) harrow, rake, or scrape exercise pens and corral sufficiently to maintain a dry surface except during periods of rainy weather.	District Rules 2201 and 457
17	Permittee shall either 1) maintain sufficient records to demonstrate that exercise pens and corrals are maintained to ensure proper drainage preventing water from standing for more than forty-eight hours or 2) maintain records of dates when exercise pens and corrals are groomed (i.e., harrowed, raked, or scraped, etc.).	District Rules 2201 and 457
18	Permittee shall scrape exercise pen and corral surfaces every two weeks using a pull-type scraper during morning hours, except when prevented by wet conditions.	District Rule 2201
19	Permittee shall maintain sufficient records to demonstrate that exercise pen and corral surfaces are scraped every two weeks using a pull-type scraper during morning hours, except when prevented by wet conditions.	District Rule 2201
20	All mature cow and heifer/bull open corrals shall be equipped with shade structures.	District Rule 2201
21	Shade structures shall be installed in any of the following ways: 1) constructed with a light permeable roofing material; 2) located uphill of any slope in the corral; or 3) installed in a North/South orientation. Alternatively, permittee shall clean manure from under shade structures at least once every fourteen (14) days, when weather permits access into the corral.	District Rules 2201 and 457
22	For compliance using shade structures constructed with a light permeable roofing material, permittee shall maintain records, such as design specifications, demonstrating that the shade structures are equipped with such roofing material. For compliance by cleaning manure from under shade structures, permittee shall maintain records demonstrating that manure is cleaned from under the shade structures at least once every fourteen (14) days, as long as weather permits access to corrals.	District Rules 2201 and 457
23	Permittee shall manage corrals such that the manure depth in the corral does not exceed twelve (12) inches at any time or point, except for in-corral mounding. Manure depth may exceed 12 inches when corrals become inaccessible due to rain events. However, permittee must resume management of the manure depth of 12 inches or lower immediately upon the corral becoming accessible.	District Rules 2201 and 457
24	Permittee shall measure and document the depth of manure in the corrals at least once every ninety (90) days.	District Rules 2201 and 457
25	All mature cow and heifer/bull open corrals shall be equipped with a sprinkler system, or an equivalent system or method, designed and operated appropriately, to sprinkle water over the entire surface of each corral (except for paved areas and areas under shade structures; and except during wet weather conditions). The sprinkling rate shall be based on the local wet soil evaporation rate (70-80% of the local wet pan evaporation rate) and shall be adjusted appropriately to maintain a moisture content on the corral surfaces that is sufficient to suppress dust emissions.	District Rule 2201
26	Permittee shall maintain records of the local evaporation rates, and records of corral sprinkling rates.	District Rule 2201
27	For heifers/bulls, at least one of the daily feedings shall be done within 1 hour of dusk.	District Rule 2201
28	Permittee shall maintain a record of the feeding schedule for heifers/bulls.	District Rule 2201
29	The combined maximum number of medium heifers (7 - 14 months old), small heifers (4 - 6 months old), and bulls shall not exceed 1,200 at any one time.	District Rule 2201
30	The number of calves may exceed the value stated in the equipment description as long as the total support stock (heifers, bulls, and calves) does not exceed the combined value stated in the equipment description, and there is no increase in the number of corrals.	District Rule 2201
31	Permittee shall maintain a record of the number of animals of each species and production group at the facility and shall maintain quarterly records of any changes to this information.	District Rules 2201 and 457
32	Permittee shall keep and maintain all records for a minimum of five (5) years and shall make records available to the APCO and EPA upon request.	District Rules 2201 and 45