ITEM 5.3

CITY MANAGER'S REPORT
NOVEMBER 13, 2023 CITY COUNCIL REGULAR MEETING

ITEM: **CONTINUED DISCUSSION FROM OCTOBER 9, 2023 REGULAR MEETING REGARDING CONDITIONAL USE PERMIT NO. CUP-23-08 AND SITE PLAN REVIEW NO. SPR-23-09 FOR THE ASHLEY FURNITURE PROJECT**

RECOMMENDATION: **Council to Consider the Following:**

1. **Testimony Presented During the Public Hearing Held October 9, 2023;**
2. **Adopt a Resolution to Find the Project Exempt from Further Environmental Review Pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183; and**
3. **Adopt a Resolution to Approve a Conditional Use Permit and Site Plan Review for the Ashley Furniture Project to Allow for the Construction of an Approximately 1.5 Million Square Foot Concrete Tilt-Up Building Located within the Central Lathrop Specific Plan Phase 2 Area.**

SUMMARY:

The applicant, Hodgdon Group Realty, Inc., is requesting a Conditional Use Permit and Site Plan Review to allow for the development of a 1,486,607 sq. ft. concrete tilt-up building on an 89.82-acre property located at the northwest corner of Dos Reis Road and Manthey Road and within the Central Lathrop Specific Plan Phase 2 area. The proposed building will include a 24,000 sq. ft. office, a 110,260 sq. ft. retail outlet and showroom and a 1,352,347 sq. ft. warehouse distribution center.

The project includes related on- and off-site improvements, including but not limited to off-street parking, lighting, landscaping, solid wall and wrought iron fencing, outdoor employee break area, paving, and street improvements (landscaping, curb, gutter, and sidewalk).

The Planning Commission and staff recommend that City Council consider all information provided and submitted, take and consider all public testimony and, if determined to be appropriate, adopt a Resolution to find the project exempt from further environmental review pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 and adopt a Resolution to approve the Conditional Use Permit (CUP-23-08) and Site Plan Review (SPR-23-09) for the Ashley Furniture Project.

SITE DESCRIPTION:

The project site is located at the northwest corner of Dos Reis Road and Manthey Road, north of terminus of Golden Valley Parkway at Dos Reis Road. The property address is 14101 S. Manthey Road and has an Accessor Parcel Number (APN) of 192-020-14). The project site is 89.82-acres in size and is generally flat and historically been used for agricultural purposes. The site has been planned for urban development and is within the CLSP Phase 2 area. Planned infrastructure extensions will be constructed to the site for public water, sewer and stormwater. The City's General Plan designates the project site for Light Industrial (LI) land uses, and will be zoned IL-CL, Limited Industrial. The project site is bounded by agricultural properties to the north, Manthey Road and Interstate 5 (I-5) to the east, Dos Reis Road and ranchette properties to the south and agricultural properties to the west. The table below depicts the surrounding land uses of the project site:

	Land Use	**Zoning District**	**General Plan (GP) Designation**
North	Agricultural Properties, City of Lathrop pond	IL-CL, Limited Industrial	LI-CL, Limited Industrial
South	Vacant Properties and Ranchette Properties Dos Reis Road	CO/DS-CL, Commercial Office R/MU/DS-CL, Residential/Mixed Use	OC-CL, Office Commercial, and R/MU-CL, Residential Mixed Use
East	Manthey Road and Interstate 5	CC, Central Commercial, R-1-5 One Family Residential R-1-5, R One Family Residential (across I-5 Highway)	CC, Central commercial and LD, Low Density Residential (across I-5 Highway)
West	Agricultural Properties	IL-CL, Limited Industrial	LI-CL, Limited Industrial

Location Map:

BACKGROUND:

The existing Ashley Furniture Outlet and Distribution Warehouse facility is located within the Crossroads Industrial area at 18290 S. Harlan Road (APN: 198-130-39), just north of the Home Depot Distribution Center. The 525,000 sq. ft. sq. ft. concrete tilt-up building was constructed in 2018 and includes a 50,000 sq. ft. retail outlet and distribution warehouse.

The Ashley Furniture Outlet and Warehouse serves as an Ashley Homestore and Outlet and distribution center. The facility will serve Northern California and adjacent States with regional offices and a call center. The applicant informed staff that Ashley Furniture's business operation has outgrown its existing facility on S. Harlan Road, and it is expected that the facility will be unable to accommodate the future operations anticipated for the company. As such, the proposed project will support the expansion needs of the company. Upon completion of the proposed project and relocation of the company to the new site, it is anticipated that subject to market conditions, the S. Harlan Road site will be completely vacated and listed for lease or sale.

The proposed project is located within the Central Lathrop Specific Plan (CLSP) Phase 2 area. The CLSP was approved by the City Council on November 9, 2004. The project included certification of the Environmental Impact Report (EIR) (SCH# 2003072132), for the CLSP, adoption of the Specific Plan document, General Plan Land Use Map amendments, Zoning Map, and text amendments to the Lathrop Municipal Code (LMC). The CLSP is separated into two (2) major phases of development. Phase 1 is generally located south of Dos Reis Road and includes a High School, development of a regional park (adjacent to the High School), residential and commercial uses. Phase 2 is located north of Dos Reis Road and previously included development of residential and commercial uses, parks, and school sites (K-8).

The Lathrop General Plan Update in 2022 (adopted by City Council on September 19, 2022) modified the Phase 2 area (north of Dos Reis Road to the City limit boundary) of the CLSP from Residential and Commercial Land Use Designations to Limited Industrial. As a result of the newly adopted General Plan, the City is also initiating an update to the Lathrop Municipal Code and Zoning Map to bring both into consistency with the General Plan. An Amendment to the CLSP for Phase 2 is being processed by the City concurrently with the proposed Ashley Furniture Project. The Amendment would update the Specific Plan to provide development standards and design guidelines for the development of limited industrial uses to be consistent with the intent of the recently assigned Limited Industrial General Plan Land Use Designation. As such, all aspects of the proposed project have been reviewed in relationship to the Central Lathrop Specific Plan Phase 2 design criteria illustrated in Chapter 7, "Design Guidelines" of the Specific Plan Amendment.

PLANNING COMMISSION:

On September 13, 2023, the Planning Commission held a public hearing on the proposed Conditional Use Permit (CUP-23-08) and Site Plan Review (SPR-23-09) for the Ashley Furniture Project. The Planning Commission received written correspondence from Mr. Michael R. Lozeau of Lozeau Drury, LLP, representing the Laborers' Union of North America, Local Union No. 73 (LIUNA) regarding the Ashley Furniture Project. The comment letter incorrectly asserts that additional CEQA analysis must be completed for the project.

With respect to the use of the exemption provisions provided under Section 15183 of the CEQA Guidelines, the City has applied these correctly to this project. Public Resources Code Section 20183.3 and corresponding State CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an EIR was certified.

The Ashley Warehouse project is consistent with the uses and development intensities established for the site under the City's General Plan and Land Use Map.

As such, the application of CEQA to the approval of development projects, such as the proposed Ashley Project, shall be limited to effects on the environment which are peculiar to the parcel or to the Project and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report. (Pub. Res. Code § 21083.3.) Further, an effect of a project on the environment is not considered peculiar to the parcel or the project, if uniformly applied development policies or standards have been adopted by the local agency with a finding that they will substantially mitigate that effect when applied to future projects. (State CEQA Guidelines § 15183(f).)

The lead agency must make a finding at a public hearing that any mitigation measures in the prior EIR that apply to the project's specific effects, and that the lead agency found to be feasible, will be undertaken. (Pub. Res. Code § 21083.3(c); State CEQA Guidelines § 15183(e).) The City has done that here, by incorporating relevant policies, actions, standards, and other mitigating requirements as Conditions of Approval for the Ashley Warehouse project. These requirements and standards are specifically identified throughout the Environmental Analysis the City prepared for the Ashley Warehouse project. Such a finding is not required for potentially significant environmental effects that are *not* considered peculiar to the parcel or the project if uniformly applied development policies or standards were previously adopted by the agency with a finding that the policies or standards would substantially mitigate the environmental effect when applied to future projects. (State CEQA Guidelines § 15183(f).) When the agency has failed to make such a finding previously, it can do so when it approves the later project.

Often, such certified prior EIRs are Program EIRs and, in fact, the factual questions as to whether project impacts fall within the scope of the prior EIR are very similar. As to reliance on a Program EIR, later activities are examined to determine whether an additional environmental document must be prepared. (State CEQA Guidelines § 15168(c).) As the commenter notes, if a later activity would result in environmental effects that were not examined in the Program EIR, the agency must prepare an initial study to determine whether an EIR or negative declaration is required to address those effects. (*Id.)* However, as is the case here, if a later activity would not have any effects that were not examined in the Program EIR (including any new or more severe impacts), the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required. (*Id.*)

Factors that an agency may consider in determining whether a later activity is within the scope of a Program EIR include "consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure as described in the program EIR." (State CEQA Guidelines § 15168(c).) An agency must incorporate feasible mitigation measures and alternatives developed in the Program EIR into later activities in the program. *(Id.)* "Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR." *(Id.)*

The City's Environmental Analysis complies with both Section 15183 and Section 15168 of the State CEQA Guidelines. The commenter claims that an EIR is required for the Project. While the applicability of the exemption provided by State CEQA Guidelines 15183 does not turn on whether the City completes some form of preliminary review, here the City did use an environmental checklist which identifies whether or not each CEQA Appendix G environmental checklist question, and its corresponding impacts, were adequately addressed in the Lathrop General Plan EIR, if there is a significant impact due to new information, or if the Project would result in a significant impact peculiar to the Project site that was not adequately addressed in the General Plan EIR. The Environmental Analysis identifies the applicable City of Lathrop development standards and policies that would apply to the proposed Project during both the construction and operational phases, identifies applicable state-level standards and requirements, and explains how the application of these uniformly applied standards and policies would ensure that no peculiar or site-specific environmental impacts would occur. As such, there are no significant impacts associated with the proposed project that would be different from, or exceed the level of severity of any significant impacts identified in the General Plan EIR. As such, there is no need for the City to adopt a Statement of Overriding Considerations for the proposed Ashley Warehouse project.

Written correspondence from LIUNA is attached to this Staff Report as Attachment 12.

After review and consideration of all information provided, and after taking and considering all public testimony, the Planning Commission voted unanimously (4-0) to adopt Resolution No. 23-13, recommending the City Council find the project exempt from further environmental review pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 and approve the Conditional Use Permit (CUP-23-08) and Site Plan Review (SPR-23-09) for the proposed Ashley Furniture Project. The Planning Commission Resolution is attached to this Staff Report as Attachment 11.

CITY COUNCIL MEETING OF OCTOBER 9, 2023

On October 9, 2023, the City Council held a public hearing on the proposed Conditional Use Permit (CUP-23-08) and Site Plan Review (SPR-23-09) for the Ashley Furniture Project. The City Council received written correspondence from Mr. Michael R. Lozeau of Lozeau Drury, LLP, representing the Laborers' Union of North America, Local Union No. 73 (LIUNA) and from Manteca Unified School District (MUSD). The LIUNA letter is attached to this Staff Report as Attachment 13 and a written response is attached to this Staff Report as Attachment 15. The MUSD letter is attached to this Staff Report as Attachment 14.

ANALYSIS:

Site Plan Review
As stated above, the proposed project includes the construction of a new 1,486,607 sq. ft. concrete tilt-up building on an 89.82-acre site located at the northwest corner of Dos Reis Road and Manthey Road. The building will include the following uses:

Use	Square Footage (sq. ft.)
Office	24,000
Retail Outlet	110,260
Warehouse Distribution Facility	1,352,347
Total	**1,486,607**

The building is generally located in the center of the subject parcel with a drive aisle providing access to all sides of the building. Off-street parking is provided both for passenger vehicles (employee parking and customer/public parking) and for commercial trucks and trailers.

Additionally, a customer pick-up area is located at the southeastern portion of the building, north of the Dos Reis automobile driveway. Customers will be guided to the customer pick up area office and directed to the specific pick-up bay.

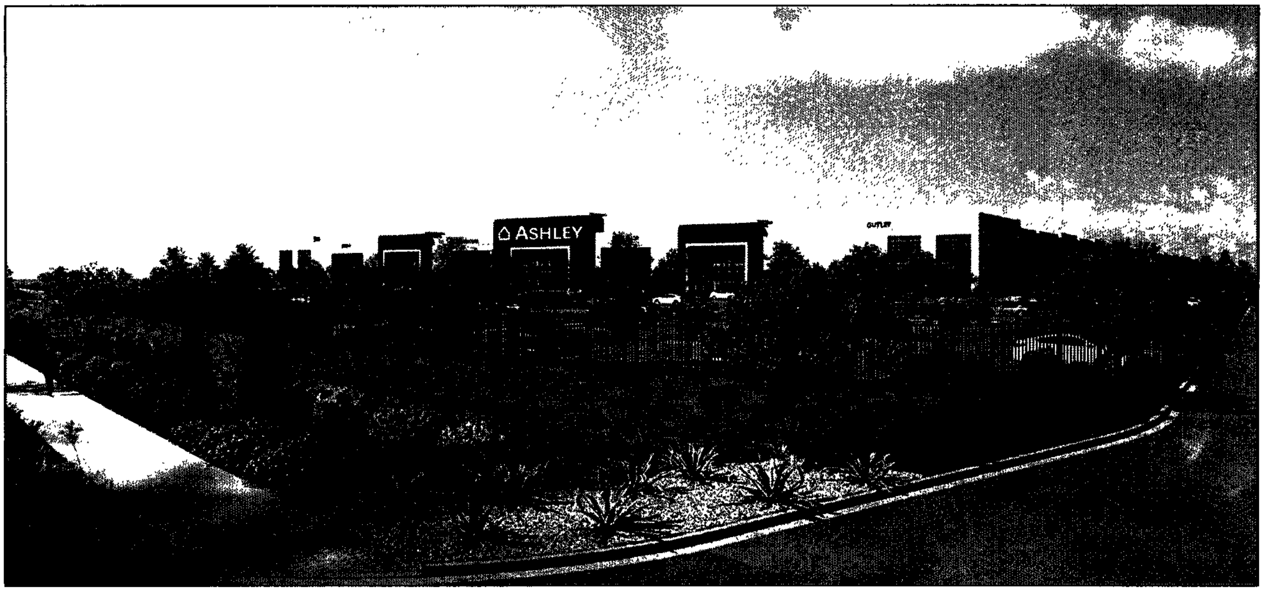
Use	Square Footage (sq. ft.)	Automobile Parking Spaces Required	Automobile Parking Spaces Provided	Commercial Truck and Trailer Spaces
Office	24,000	1 per 400 sq. ft. 60 spaces	942 total (Employee stalls = 462) (Public stalls = 480)	1,104 (12′ x 30′ = 46) (12′ x 40′) = 261) (12′ x 53′ = 797)
Retail Outlet	110,260	1 per 600 sq. ft. 184 spaces		
Warehouse	1,352,347	1 per 2,000 sq. ft.		
Total		**920 Spaces**	**942**	**1,104**

Automobile parking spaces are nine (9) by eighteen (18) feet in size, meeting the dimension requirements pursuant to Section 17.76.030, *Standards for off-street and on-street parking facilities*. Of the 942 automobile parking spaces provided, twenty (20) are handicap accessible (including four (4) van accessible), 188 are Electric Vehicle (EV) capable parking spaces, and twelve (12) are EV parking spaces pursuant to California building Code (CBC) requirements.

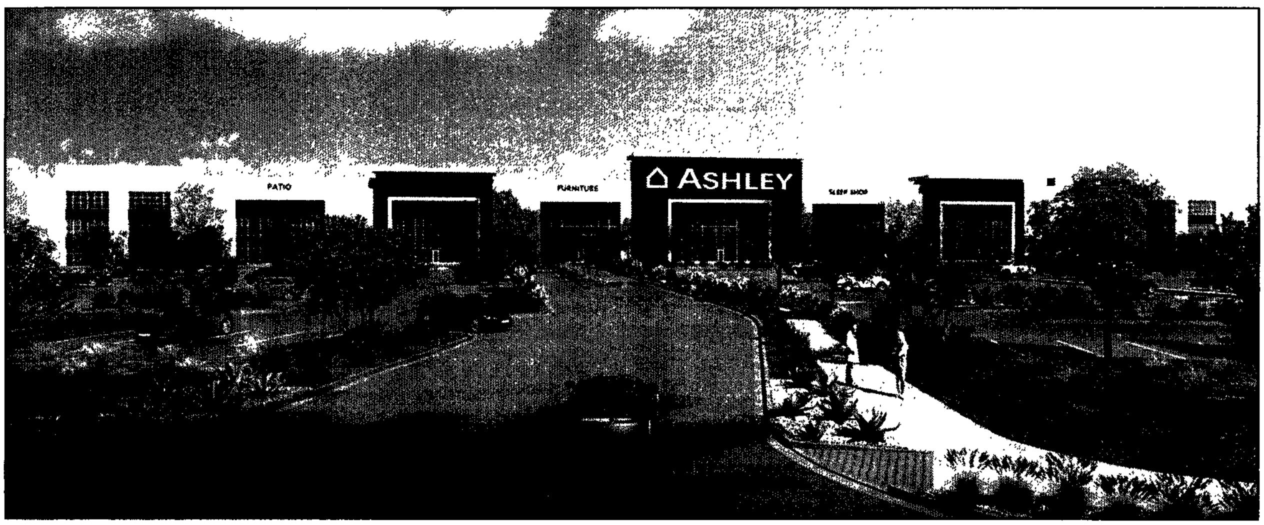
As noted in the table above, the commercial truck and trailer spaces include a variety of sizes to accommodate single trailers and the commercial truck cab and tailer. Commercial truck and trailer parking is located primarily on the eastern portion of the Site Plan and along the northern and southern property line.

Architecture

The proposed building is designed as a concrete tilt-up structure with colored wall accents and glass treatments near the outlet/showroom entrance and employee entrances. The elevation facing S. Manthey Road and Interstate 5 (I-5) will convey a high-quality office/retail appearance while maintaining key functions, including customer pick-up area along the southeast elevation. The appearance is achieved with glazing to indicate an office appearance and clerestory windows along the upper potions of the façade. The building also includes accent shading features, variations in parapet height and colors. Collectively, these provide for enhanced visual interest and varied building massing, to create distinctive points of entry for users. The following is a portion of the east elevation and a rendering looking at the building from S. Manthey Road.



Looking West from S. Manthey Road



Looking West from S. Manthey Road

The building varies in height from 46 feet to 60 feet. The tallest height of the building is located at the entrance, facing S. Manthey Road (illustrated above). The distribution warehouse portion of the building is 46 feet to the parapet. The height fluctuates between 43 feet to 46 feet for the majority of the building. The maximum height allowed under the Limited Industrial Zoning District in the CLSP Phase 2 Amendment is 76 feet.

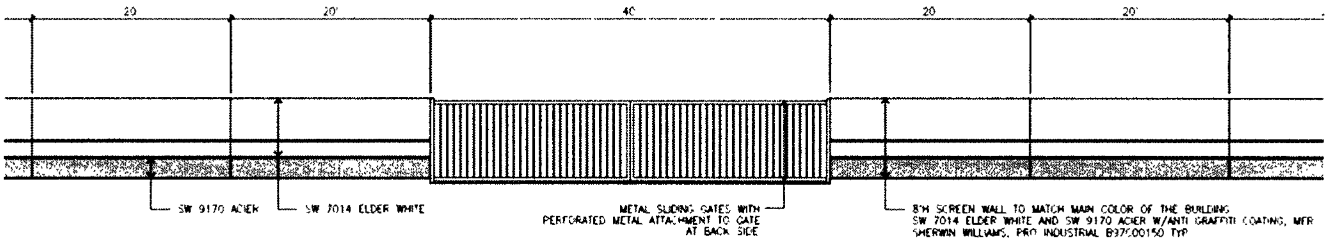
Floor Plan
As noted above, the proposed building will include a three-story, 24,000 sq. ft. office, two-story 110,260 sq. ft. retail outlet and showroom, and a 1,352,347 sq. ft. warehouse distribution center. The office is located within the northeastern portion of the building and will include a variety of offices, conference rooms, restrooms, and breakroom for each floor. The retail outlet and showroom will have an open floor plan, similar to the existing Ashley Furniture Outlet on S. Harlan Road. An escalator will provide access to the second floor retail outlet and showroom.

Lighting
Lighting is proposed to be shielded and directed towards the parking and access areas only. As illustrated on the Photometric Plan (Attachment 6), lighting levels beyond the property line are at 0 candle power. Specific lighting detail, beyond the photometric plan will be refined as part of the Building Permit process.

Landscaping
Landscaping is provided throughout the project area and represents 10.4% (388,479 sq. ft.) of the entire project area (excluding stormwater detention basins). Landscape treatment along Dos Reis Road and S. Manthey Road include a variety of large trees, screening trees (discussed further below), medium trees, shrubs and ground cover. Shade trees are proposed throughout the parking lot (public and employee parking areas) and at maturity, 73% of the parking area will be shaded, exceeding the City's requirement of 50%. The Preliminary Landscape Plan is attached to this Staff Report as Attachment 8.

Fencing and Walls
Proposed fencing and walls for the project are illustrated in the Screen Wall and Fencing Plan (Attachment 6). The proposed project will include three (3) fence types: wrought iron fencing, steel gate and solid tilt-up screen all. The wrought iron fencing will be utilized within the interior of the project, particularly to secure the employee parking area and along the northern and western property line. A steel sliding gate will be utilized at the access points to the employee parking area and the off-street parking area for trucks/trailers. A solid tilt-up screen wall will be utilized along a portion of the northern property line (along the commercial truck driveway) and the southern property line to screen the project from uses to the south.

The following is a detail of the screen wall and metal gate:



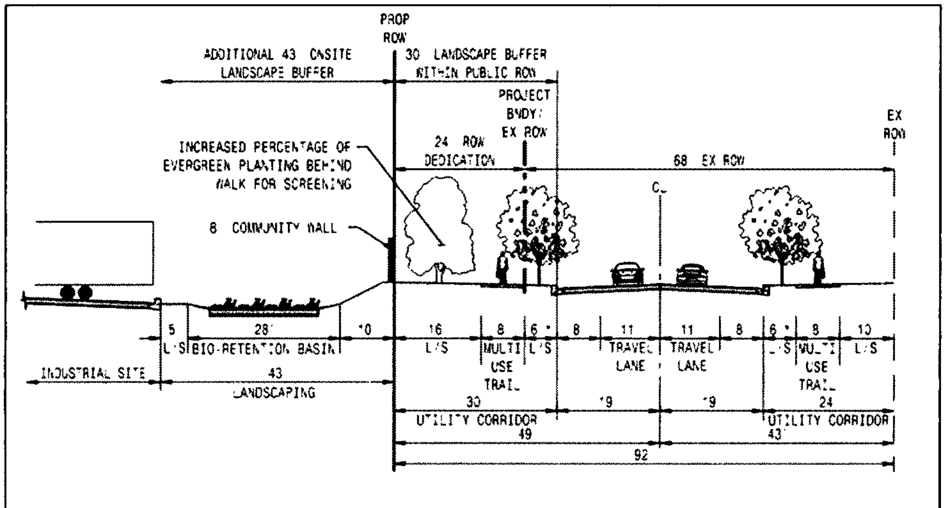
<u>Screening along Dos Reis Road</u>
The proposed project includes a variety of strategies to screen the building and off-street parking of commercial vehicles and trailers from Dos Reis Road and adjacent properties to the south. These strategies include the following:

1. Installation of an 8-foot tall solid screen wall at the southern property line.

2. Planting of a mixture of deciduous shade trees and large evergreen trees for purposes of screening. As illustrated in the Preliminary Landscape Plan (Attachment 8), Deodar Cedar trees will be planted along Dos Reis Road at a maximum spacing of 40 feet. Deodar Cedar trees are a type of evergreen tree that keep its foliage year-round.

   Chinese Flame Trees will also be planted along Dos Reis Road to assist in screening. The trees and landscaping will be installed between the 8 foot sidewalk and the 8' wall along Dos Reis Road.

3. Providing an additional landscape buffer along Dos Reis Road. As illustrated in the cross-section of Dos Reis Road below, the project includes an additional 43 foot on-site landscape buffer adjacent to the public right-of-way. In addition to the landscape buffer north of Dos Reis Road within the public right-of-way, there is a total of 73 feet between the roadway and the off-street parking of commercial trucks/trailers.



Ⓐ DOS REIS ROAD (WEST) - 92' PROPOSED ROW

4. The building is setback 279 feet from the property line, which assists in limiting the sight line from Dos Reis Road. As illustrated in the Sight Line Exhibit below, the building is screened from view from the northern sidewalk along Dos Reis Road.

The applicant has prepared renderings of the proposed screening along Dos Reis Road, with mature trees and associated landscaping. The images below illustrate the proposed landscaping and screening strategies along Dos Reis Road. The full set of renderings are attached to this Staff Report as Attachment 9.

Looking North from Golden Valley Parkway

Looking Northeast from Dos Reis Road

Traffic and Circulation

Passenger vehicle access to the project is provided via Dos Reis Road and S. Manthey Road. As noted above, the proposed project includes two (2) driveways from passenger vehicles, one (1) along Dos Reis Road, east of Golden Valley Parkway and the other along S. Manthey Road. An Emergency Vehicle Access (EVA) driveway is located on Dos Reis Road, west of Golden Valley Parkway.

A Traffic Impact Analysis (TIA) was prepared for the proposed project by TJKM Transportation Consultants. The Traffic Impact Analysis analyzed the following scenarios:

- Existing Conditions – Intersection Level of Service
- Existing Conditions – Freeway Mainline Level of Service
- Baseline Conditions – Intersection Level of Service
- Baseline Conditions – Freeway Mainline Level of Service
- Baseline plus Project Conditions – Intersection Level of Service
- Baseline plus Project Conditions – Freeway Mainline Level of Service
- Cumulative Conditions – Intersection level of Service
- Cumulative plus Project Conditions – Intersection Level of Service

In addition to the Level of Service scenarios analyzed above, the Traffic Impact Analysis included a Vehicle Miles Traveled (VMT) Analysis, consistent with California Environmental Quality Act (CEQA) Guidelines and Senate Bill 743.

Trip Generation
To determine the amount of peak hour and daily trips generated by the project, TJKM conducted a 24-hour count at the existing Ashley Furniture facility located on S. Harlan Road. The approximate square footage of the existing Ashley Furniture facility is 525,000 sq. ft. and with this information and data collected from the 24-hour count, TJKM developed trip rates for the proposed project for passenger vehicles and heavy trucks. The following tables illustrate the trip generation for the proposed project.

Table 13: Project Trip Generation for Passenger Vehicles

	Size		Daily		A.M. Peak					P.M. Peak				
			Rate	*Trips*	*Rate*	*In:Out*	*In*	*Out*	*Total*	*Rate*	*In:Out*	*In*	*Out*	*Total*
Proposed Uses														
Ashley Furniture	1,500	ksf	1.87	2,798	0.135	61:39	124	79	203	0.170	43:57	110	145	255
Net Trips				***2,798***			***124***	***79***	***203***			***110***	***145***	***255***

Table 14: Project Trip Generation for Heavy Trucks

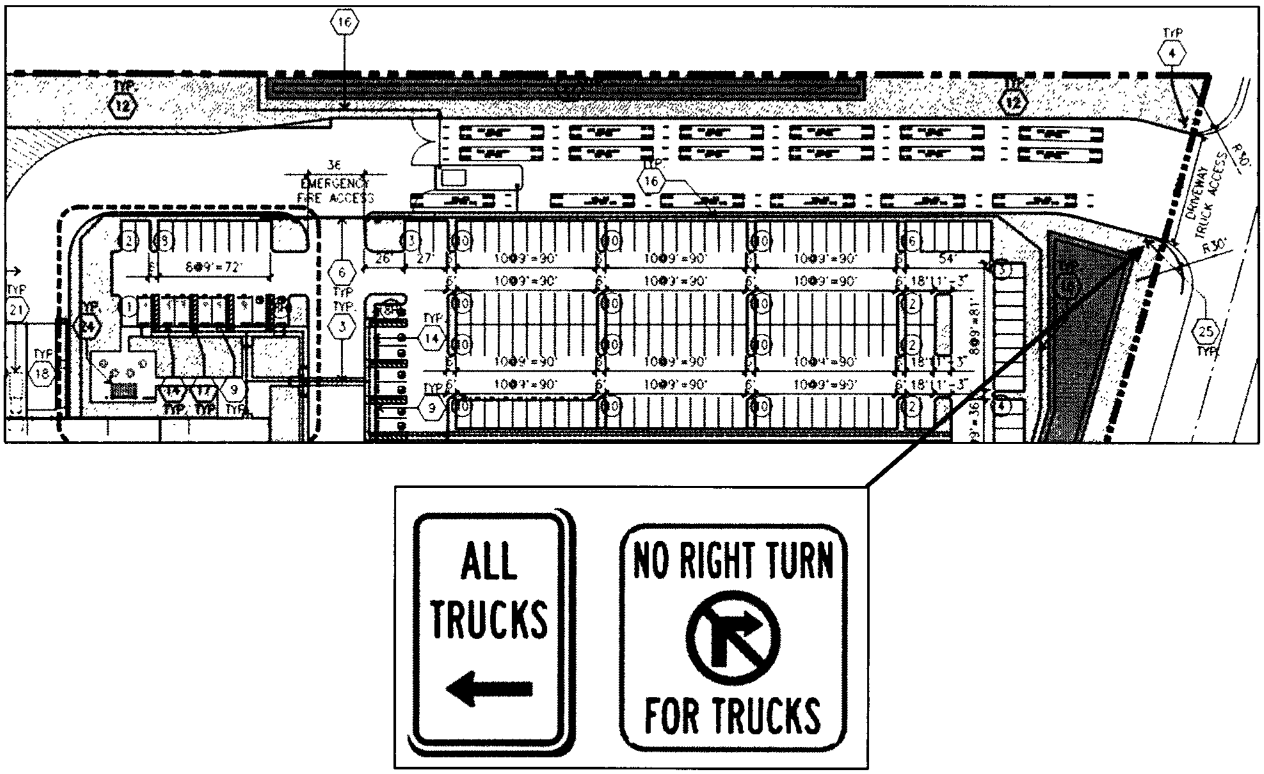
Land Use	Size		Daily		A.M. Peak					P.M. Peak				
			Rate	*Trips*	*Rate*	*In:Out*	*In*	*Out*	*Total*	*Rate*	*In:Out*	*In*	*Out*	*Total*
Proposed Uses														
Ashley Furniture	1,500	ksf	0.453	680	0.063	15:85	14	81	95	0.030	69:31	31	14	45
Net Trips				***680***			***14***	***81***	***95***			***31***	***14***	***45***

As shown in the table above, the proposed project is projected to generate 2,798 daily passenger vehicles, 203 a.m. peak hour passenger vehicles, and 255 p.m. peak hour passenger vehicles. For heavy trucks, the proposed project is projected to generate 680 daily heavy trucks, 95 a.m. peak hour trucks, and 45 p.m. peak hour trucks.

Trip Distribution
Pursuant to General Plan Implementation Action Lu-5.f and the Central Lathrop Specific Plan Amendment for Phase 2, truck traffic within the Limited Industrial area of the Specific Plan shall be limited to De Lima Road, and any future roadways north of Dos Reis Road, to connect to Manthey Road, Roth Road, and Interstate 5. Additionally, truck dependent development projects shall be prohibited from providing driveway access points off of Dos Reis Road, west of Golden Valley Parkway, other than Emergency Vehicle Access (EVA) (Implementation Action LU-5.f (b)(iii).

The proposed project includes one (1) driveway dedicated to commercial trucks and is located on S. Manthey Road, within the northeastern portion of the project.

Signage is proposed that will direct traffic north on S. Manthey Road and prohibit trucks from turning right on to S. Manthey Road toward Dos Reis Road and Golden Valley Parkway.



<u>Traffic Impact Analysis Results</u>
The intersection level of service analysis for Baseline plus Project Conditions results in three (3) intersections operating at unacceptable service levels during the a.m. and p.m. peak hour. It is important to note that the following intersection already operates at unacceptable level of service without the addition of project traffic:

- Lathrop Road/I-5 Northbound Ramps degrades to LOS F in the p.m. peak hour, with an increase in average delay of 19.1 seconds.

The following two (2) intersections would degrade from acceptable to unacceptable level of service with the addition of project traffic:

- Lathrop Road-Spartan Way/I-5 Southbound Ramps would degrade from LOS D to LOS E in the a.m. and p.m. peak hour, a substantial degradation.

- Spartan Way/Golden Valley Parkway intersection would degrade from LOS C to LOS E in the a.m. peak hour and LOS D to LOS F in the p.m. peak hour, a substantial degradation.

To improve the traffic flow for the three (3) above noted intersections, the Traffic Impact Analysis recommends the following improvements:

- A separate right-turn lane added to the Lathrop Road/I-5 Northbound off-ramp as well as signal timing to improve the intersection operation to LOS C in the a.m. and p.m. peak hours. The new lane should provide at least 400 ft. of vehicle storage.

- For the Lathrop Road/I-5 Southbound off-ramp, adjusting the signal timing of the existing traffic lights will improve the intersection operate to LOS D in the a.m. and p.m. peak hour. Widening is not necessary for the Baseline plus Project Conditions at the southbound off-ramp.

- For Spartan Way/Golden Valley parkway, the TIA recommends making adjustments to the lane geometry (number of turn lanes, through lanes, and right-turn lanes) to improve the efficiency of the intersection.

These improvements have been incorporated into the proposed project's Conditions of Approval. The TIA is attached to this Staff Report as Attachment 10.

Utilities
Potable water will be supplied to the proposed project by the City of Lathrop via connection to an existing 12" water line in Golden Valley Parkway, south of Dos Reis Road. The CLSP Phase 2 Amendment states that water supply to the plan area will be provided from the City's existing groundwater wells and potable surface water from the South County Surface Water Supply Program (SCSWSP) by the South San Joaquin Irrigation District (SSJID).

Wastewater generated by the project will be treated by the City's Consolidated Treatment Facility (CTF) along Christopher Way, southeast of the project site. The project will connect to an existing 24" sanitary sewer line in Golden Valley parkway, south of Dos Reis Road. As part of the project's Conditions of Approval, the applicant is required to secure sufficient sewer treatment capacity, including treatment at the City's CTF.

Per the CLSP Phase 2 Amendment, stormwater runoff from the plan area is designed to discharge into the San Joaquin River through an existing outfall located near the southwest corner of the CLSP Phase 2 Amendment Plan Area at the end of Dos Reis Road and the existing outfall within the Phase 1 area.

The CLSP Phase 2 Amendment Plan Area consists of two (2) major drainage sheds with underground storage pipes to reduce the peak discharge from the plan area to the San Joaquin River. The project site is located within Watershed 4, which includes both CLSP Phase 1 and the CLSP Phase 2 Amendment areas. The proposed project will connect to the existing 54" Stormdrain line in Golden Valley Parkway, south of Dos Reis Road. Stormwater will be treated on-site with Best Management Practices (BMPs) through a series of bio-detention basins prior to entering the City system. The Civil Plans are attached to this Staff Report as Attachment 7.

Zoning Consistency

The project site will be located within the IL-CL, Limited Industrial Zoning District in which a Zoning Map and Municipal Code Amendment is also being processed by the City for consistency with the recently adopted General Plan. Chapter 17.62, Article 6, and Article 12 will provide guidance and development requirements for projects located within this District. Section 17.62.061 of the Zoning Ordinance will be amended as part of the General Plan consistency effort to state the following: "the IL-CL district is intended to provide opportunities for certain types of limited industrial uses; provide adequate space to meet the needs of modern industrial development, including off-street parking and truck loading areas; and to provide industrial employment opportunities for residents of the city and region." Principal uses include but are not limited to assembly of small electrical equipment and appliances, various manufacturing uses, lumber yards, public utility and public service structures, public buildings and grounds, business parks and incubator spaces, research development industry and business support services and warehouse and distribution facilities.
The proposed project is considered a principal use.

Table 17.62.120(B), *Central Lathrop Specific Plan: Industrial Development Standards* provides the development standards required of the IL-CL District, and the table below depicts the conformance determination between the Zoning Ordinance and the proposed project.

Development Standard	**IL-CL Zone District**	**Proposed Project**
Lot Dimensions		
Lot Size (Minimum)	No Minimum or Maximum Requirement	89.82-acres
Setbacks (Minimum)		
Front/Rear/Side	15 feet / 0 feet / 0 feet	Front: Approximately 418-feet from S. Manthey Road Side: Approximately 279-feet from Dos Reis Road and 220-feet from then northern property line. Rear: Approximately 704-feet from the rear property line.
Maximum Building Height	Seventy-six (76) feet	60-feet
Off-Street Parking	Office – 1 per 400 square feet = 60 spaces Retail – 1 per 600 square feet = 184 spaces Warehouse – 1 per 2,000 square feet = 676 spaces Total required: 920	942 total (Employee stalls = 462) (Public stalls = 480) 1,104 truck and trailer spaces (12' x 30', 40', and 53'
Landscaping	10% of Site shall be landscaped	10.4% (388,618 square feet of landscaping)
Hours of Operation	No Specific Limit	Retail – 9:00 am to 9:00pm Office – TBD Distribution – TBD

Based on Staff's review, the proposed project is consistent with the requirements of the IL-CL Zoning District.

<u>Design Guidelines</u>
The Central Lathrop Specific Plan (CLSP) Phase 2 Amendment includes a variety of principles and standards related to land use, site design, and architecture. Staff has reviewed the proposed project Site Plan, Building Elevations, Landscape Plans, and Architecture (Attachments 6 through 8) and has determined that overall compliance with the Design Guidelines listed in the CLSP Phase 2 Amendment has been achieved.

Where applicable, Conditions of Approval have been incorporated to the proposed project to address the following improvements: perimeter wall treatment, on-site lighting, screening of exterior building equipment (e.g., mechanical equipment, A/C, etc.), screening of commercial truck and trailer storage, and landscape buffer requirements and treatment.

General Plan

The project site has a General Plan Land Use Designation of LI, Limited Industrial. The intent of the IL land use designation is to, "accommodate a wide range of jobs-generating uses, including business parks; clean light industrial; research and development (R&D); science, technology, engineering, and math (STEM); tech/biotech manufacturing; high-tech services that incorporate some combination of assembly, warehousing, and/or sales, hospitals and other health care-related uses, warehouses and distribution centers."

The Ashley Furniture Project has been reviewed by Staff for consistency with the General Plan and finds that the proposed project is consistent with the following General Plan Policies and Implementation Actions (consistency statements are in italics):

LU-5.1 Require new development to be compatible and complementary to existing development. Where appropriate and feasible, promote connections between neighborhoods and services and facilities.

As noted above, the subject property has a General Plan Land Use Designation of LI, Limited Industrial and will be located within the Central Lathrop Specific Plan (CLSP) Phase 2 Amendment area IL, Limited Industrial Zoning District. The proposed project would improve and extend Golden Valley Parkway and construct a roundabout at the intersection of Dos Reis Road and Golden Valley Parkway which would provide connection to the CLSP Phase 1 area for passenger vehicles. The proposed use is compatible with the IL, Limited Industrial Zoning District and the CLSP Phase 2 Amendment.

LU-5.4 In industrial areas located within 1,000 feet of existing or planned sensitive receptors, promote industrial uses that are environmentally sustainable with limited potential to create nuisances such as noise and odors.

An Environmental Noise Assessment, prepared by Saxelby Acoustics and a Health Risk Assessment (HRA), prepared by De Novo Planning Group were prepared to analyze the noise and health risks impacts associated with the proposed project, respectively.

As noted in the Environmental Noise Assessment, the City's General Plan limits stationary noise increases to 3 dBA, or the City's noise standards (daytime (7:00 am to 10:00 pm) maximum of 55 dBA and nighttime (10:00 pm to 7:00 am) maximum of 45 dBA). The average ambient noise level during nighttime hours at the closest sensitive receptors to the southwest is 54 dBA L_{eq}. At the sensitive receptors to the southwest, a project-generated noise level of 51 dBA L_{eq} would result in a total noise level of 54 dBA L_{eq}, resulting in a 3dBA increase. Therefore, the nighttime noise level standard applicable to the proposed project is 51 dBA L_{eq}.

The primary noise source associated with operation of the proposed project is truck and automobile circulation and loading docks. Single family residential land uses are located to the north, west, and south of the project, Lathrop High School is located to the west of the project, and Interstate 5 is located directly east of the project. Saxelby Acoustics conducted noise measurements at the existing Ashley Facility located on S. Harlan Road. Measurements were conducted in the loading dock area during a weekday peak hour of use. Activities during the peak hour include truck arrival/departures, truck idling, truck backing, air brake release, passenger vehicle trips to and from docks, and operation of forklifts. Loading dock activity was found to generate continuous average noise levels of approximately 57 dBA L_{eq} at the edge of the truck maneuvering lanes, approximately 120 feet from the façade of the building at the center of the loading area. Saxelby Acoustics took these measurements and utilized SoundPLAN to predict noise levels for the proposed project.

The proposed project is predicted to generate noise levels up to 45 dBA L_{eq} at the nearest residences to the southwest and 39 dBA L_{eq} at the residences to the northeast, resulting in a maximum increase of 0.9 dBA at nearby residences. This complies with the adjusted nighttime noise level standard of 51 dBA L_{eq} and limit of 3 dBA increase. Therefore, the Environmental Noise Assessment did not recommend any additional noise control measures to achieve compliance with the City's noise level standards.

Although not specifically required to achieve noise level standards, the proposed project includes an 8-foot tall solid wall along the southern property line and a portion of the northern property as required by the Lathrop Municipal Code when an industrial use is adjacent to a residential use and for screening purposes along Dos Reis Road. This will assist in reducing noise exposure from the operation of the Ashley Furniture project. Additionally, the project is required to adhere to California Air Resources Board (CARB) rules and regulations for use of diesel fueled fleets, including limiting the idling time for heavy trucks to five (5) minutes.

The HRA was prepared to evaluate whether or not the estimated construction and operational toxic air contaminant (TAC) emissions generated from the proposed project will cause significant impacts to the local air resources in the project area, in particular, sensitive receptors such as residences located in proximity to the project. The results of the risk analysis indicate that cancer risks vary depending on the exposure scenario (residential or worker) and on location. Locations nearest the project site have the greatest exposure and the associated risks are considerably lower as distance from the project site increases. None of the exposure levels at any of the nearby sensitive receptors exceed any of the thresholds of significance established by the San Joaquin Valley Air Pollution Control District (SJVAPCD) for residents or workers. This finding applies to both cancer risks and non-cancer chronic long term exposure to diesel particulate matter (DPM).

LU-5.5 Ensure that industrial development projects, including warehouse, distribution, logistics, and fulfillment projects, mitigate adverse impacts (including health risks and nuisances) to nearby residential land uses and other existing and planned sensitive receptors.

As noted above, a Health Risk Assessment, prepared by De Novo Planning Group has been prepared as part of the Environmental Checklist. The HRA findings are described above. The HRA concluded that the project would not exceed any of the applicable thresholds of significance related to toxic air contaminants and health risks.

LU-5a Through the development review process, screen development proposals for land use and transportation network compatibility with existing surrounding or abutting development or neighborhoods.

As noted above, a Traffic Impact Analysis (TIA) was prepared for the proposed project by TJKM Transportation Consultants to evaluate the impacts of the transportation infrastructure due to the addition of traffic from the proposed project. The report also evaluates project site access and on-site circulation for vehicles, bicycles, and pedestrians. The proposed project includes a dedicated truck driveway located at the northeastern portion of the project site with full access to S. Manthey Road.

This driveway is approximately 488-feet in length and provides double-stacking for trucks entering the site and a single lane exiting the site. As required by the City's General Plan, trucks are prohibited from utilizing Golden Valley Parkway, Dos Reis Road west of Golden Valley Parkway, Spartan Way, and Lathrop Road. As such, trucks entering and exiting the site will utilize Roth Road and S. Manthey Road.

LU-5.b Through the development review process, analyze land use compatibility and require adequate buffers and/or architectural enhancements to protect sensitive receptors from intrusion of development activities that may cause unwanted nuisances and health risks.

The proposed project includes a landscape buffer and screening along Dos Reis Road. The buffer includes a 43 feet of on-site landscaping in addition to the 30 feet of landscaping within the public right-of-way adjacent to Dos Reis Road. Landscaping will include a mixture of deciduous shade trees and large evergreen trees for the purpose of screening.

LU-5.c When industrial projects, including warehouse projects, fulfillment centers, and other projects that may generate high volumes of truck trips and/or air quality emissions are proposed within 1,000 feet of existing or planned residential sues or other sensitive receptors, the City shall require the preparation of a Health Risk Assessment (HRA) that meets the standards established by the Office of Environmental Hazard Assessment (OEHHA), and the San Joaquin Valley Air Pollution Control District (SJVAPCD). Projects shall not be approved until it can be demonstrated that the project would not result in an exceedance of the established threshold of significance for public health risks at nearby sensitive receptors.

As noted above, an HRA, prepared by De Novo Planning Group, has been prepared as part of the Initial Study Checklist. The HRA was prepared in accordance with the standards established by OEHHA and SJVAPCD. The HRA findings are presented above.

LU-5.d When industrial projects, including warehouse projects, fulfillment centers, and other projects that may generate high volumes of truck trips and/or air quality emissions are proposed within 1,000 feet of existing or planned residential uses or other sensitive receptors, the City shall require the implementation of best management practices (BMPs) to reduce pollution exposure to sensitive receptors, particularly diesel particulate matter (DPM). The appropriate BMPs shall be established on a case-by-case basis, and should consider the following tools, methods, and approaches:

- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.

- Providing adequate areas for on-site parking, on-site queueing and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.

- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility. Exceptions can be made for emergency vehicle access (EVA) points.

- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors.

- Screening dock doors and onsite areas with significant truck traffic and noise with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.

- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.

- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

The proposed project is consistent with Implementation Action LU-5.d as follows:

- *As noted above, the proposed project includes the construction of an 8 foot tall solid wall along the majority of the southern property line and a portion of the northern property line. Additionally, the proposed project includes a on-site landscape buffer along Dos Reis Road approximately 43-feet in width and 30 feet of landscaping within the public right-of-way.*

- *Off-street parking is provided for passenger vehicles (employee parking and customer/public parking) and for commercial trucks and trailers. As noted above, the amount of off-street parking provided exceeds the minimum required pursuant to the Lathrop Municipal Code.*

- *The proposed project includes one (1) dedicated driveway for trucks, located along S. Manthey Road at the northeastern portion of the project site. The driveway allows stacking of approximately 488-feet with two (2) entry lanes and one (1) exit lane. Automobile driveways are located along S. Manthey Road (primary entry/exit) and Dos Reis Road. An additional Emergency Vehicle Access (EVA) driveway is located on Dos Reis Road, west of Golden Valley Parkway.*

- *As noted above, the warehouse dock doors are located on the north and south sides of the proposed building.*

- *As noted above, the proposed project includes screening via an 8 foot solid wall and landscaping along the majority of the southern property line. Additionally, an 8 foot solid wall will be constructed along a portion of the northern property line, screening the truck entrance/exit drive aisle.*

- *The proposed project will be required to place on-site and off-site signage indicating that trucks must adhere to the City's Truck Route Ordinance.*

LU-5.f Update the Central Lathrop Specific Plan (CLSP) to accomplish the following objectives:

a. Bring the Specific Plan's land use map into consistency with the General Plan Land Use Map (Figure LU-1)

b. Establish a circulation network that keeps future truck trips as far from existing and planned sensitive receptors as feasible; this includes, but not limited to, the following requirements, which shall be incorporated into the Specific Plan:

i. Trucks shall be prohibited on Dos Reis Road west and east of Golden Valley Parkway, on Golden Valley Parkway south of Dos Reis Road to Lathrop Road, and on Lathrop Road east of Golden Valley Parkway to Interstate 5 southbound off-ramp.

ii. Future truck dependent development projects shall be prohibited from providing driveway access points off of Dos Reis Road, west of Golden Valley Parkway, other than emergency vehicle access (EVA).

iii. Truck traffic within the Limited Industrial Area of the Central Lathrop Specific Plan shall be limited to De Lima Road, and any future roadways north of Dos Reis Road, to connect to Manthey Road, Roth Road, and Interstate 5.

c. Establish site design standards for new industrial projects;

d. Identify financing and cost-recovery methods to fund roadway and infrastructure improvements.

e. Circulation design standards that promote safe transportation routes that limit impacts to developed areas to the south, and connectivity enhancements to provide better connectivity to I-5.

f. Infrastructure improvements to improve roadway operations.

g. Opportunities to provide employee-serving amenities onsite, such as parks and plazas, outdoor seating areas, fitness facilities, and daycare centers as a means to reduce vehicle trips, while supporting air quality, public health, and sustainability goals.

h. Include provisions that all development projects proposed north of Dos Reis Road and south of De Lima Road be required to obtain a Conditional Use Permit (CUP), which shall be subject to discretionary review by the City Council.

The proposed project is consistent with the CLSP Phase 2 Amendment design guidelines, policies, and land uses. The City is processing the CLSP Phase 2 Amendment concurrently with the Zoning Consistency Update and the Ashley Furniture Project. The CLSP Phase 2 Amendment has been prepared consistent with the requirements established by this General Plan Action.

<u>Conditional Use Permit</u>
The General Plan and Central Lathrop Specific Plan (CLSP) Phase 2 Amendment requires all development projects proposed between Dos Reis Road and De Lima Road to obtain a Conditional Use Permit (CUP) subject to discretionary review by the Planning Commission and the City Council.

The Planning Commission and City Council must make certain findings when approving a Conditional Use Permit:

1. That there are circumstances or conditions applicable to the land, structure, or use which makes the granting of a use permit necessary for the preservation and enjoyment of a substantial property right;

2. That the proposed location of the conditional use is in accordance with the objectives of the zoning code and the purposes of the district in which the site is located;

3. That the proposed use will comply with each of the applicable provisions of this the LMC.

Staff has reviewed each of the findings presented above and suggests that the proposed project location is consistent with the City's zoning code and is a permitted use within the zoning district in which the site is located.

<u>Site Plan Review</u>
In accordance with Chapter 17.100, *Site Plan Review*, of the Lathrop Municipal Code (LMC), the Planning Commission must make the following findings when approving a Site Plan:

1. That the site plan complies with all applicable provisions of this chapter;

2. That the site improvements listed (a. through i.) are so arranged that traffic congestion is avoided and that pedestrian and vehicular safety and welfare are protected, and there will not be adverse effect on surrounding property;

3. Proposed lighting is so arranged as to deflect the light away from adjoining properties;

4. Proposed signs will comply with all of the applicable provisions of Section 17.16.010 and Chapters 17.64 through 17.72, 17.80 and 17.84;

5. That adequate provision is made to reduce adverse or potentially adverse environmental impacts to acceptable levels.

Staff has reviewed each of the findings presented above and suggests that the proposed project has been designed so that the use is compatible with the surrounding land uses and will not be detrimental to the health, safety, or general welfare of the City.

Conditions of Approval
Planning staff routed the project plans on February 14, 2023 and May 17, 2023 to the Building Division, Public Works Department, Lathrop-Manteca Fire District, Lathrop Police Department for review and to ensure compliance with applicable codes and requirements. Planning staff also routed the project plans on June 1, 2023 to various non-City agencies. The City received comments from the following agencies:

- Caltrans
- San Joaquin Council of Governments
- San Joaquin County Environmental Health Department
- San Joaquin Valley Air Pollution Control District
- South San Joaquin Irrigation District
- Pacific Gas & Electric

The Caltrans letter stated that the project has the potential to significantly impact the interchange and requested that a Traffic Impact Study be submitted to Caltrans for review and comment prior to project approval.

As noted above, City staff routed the Traffic Impact Analysis, prepared by TJKM to Caltrans on July 12, 2023. The City received a letter from Caltrans on August 9, 2023 with comments on the Traffic Impact Study. The majority of the comments were associated with the technical aspects of the Traffic Impact Study, such utilizing Caltran's Three County Travel Demand Model, trip count year, and request for an explanation why Lathrop Interchange is not being utilized by trucks. TJKM will continue to work with Caltrans to refine the Traffic Impact Study. As noted above, the applicant will be required to construct a separate right-turn lane to the Lathrop Road/I-5 Northbound off-ramp (400 ft. of vehicle storage) which will require an Encroachment Permit from Caltrans. The applicant is working with Caltran's to address their concerns.

SJCOG provided information regarding the project's participation in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) and that the project is located within the Airport Influence Zone pursuant to the Airport Land Use Compatibility Plan (ALUC). Additional review has been completed by SJCOG and the project was found to be compatible with the ALUC.

The San Joaquin County Environmental Health Department provided requirements for geotechnical drilling and process for abandonment and destruction of any wells or septic systems on the property.

San Joaquin Valley Air Pollution Control District (SJVAPCD) provided comments on measures to reduce air quality impacts associated with diesel vehicles and industrial projects, instructions for preparation of a Health Risk Screening/Assessment and the District's Rules and Regulations.

The Pacific Gas & Electric (PGE) letter provided requirements for planting trees and shrubs along S. Manthey Road and underneath existing PG&E overhead pole line and that any planting in this area must comply with PG&E's guide to *Trees and Shrubs for Power Line-Friendly Landscaping*.

As a result, staff developed a consolidated list of conditions (Attachment 3). Staff finds that the proposed project has been properly conditioned to meet the City's standards and requirements.

Public Notice
A Notice of Public Hearing was advertised in the Manteca Bulletin on September 29, 2023. Staff also mailed the public hearing notice to notify property owners located within a 300-foot radius from the project site boundary. In addition, the Public Notice was emailed to the City's Public Hearing subscribers and interested parties and posted at three (3) locations accessible to the public and the City website.

CEQA REVIEW:

California Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 allows for a streamlined environmental review process for projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

If the above qualifications are met, as stated in Section 15183(b), "a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

1. Are peculiar to the project or the parcel on which the project would be located;

2. Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent;

3. Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or

4. Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe impact than discussed in the prior EIR.

A detailed environmental analysis, prepared in the form of an Environmental Checklist with supporting technical analysis, has been prepared by De Novo Planning Group, to provide analysis of three distinct, yet closely related actions being contemplated by the City. These include an update to the Lathrop Municipal Code (LMC) and Zoning Map (Zoning Consistency Update), and update to the Phase 2 (CLSP Phase 2 Amendment) and the proposed Ashley Furniture Project. The three (3) projects are being implemented as a result of the City's comprehensive General Plan update, which was adopted on September 19, 2022. The General Plan Update provides a framework for future growth and projects the development reasonably expected during the build-out of the City. The Lathrop General Plan Update EIR analyzed the environmental impacts associated with adoption and implementation of the General Plan. All three of the actions analyzed in the Environmental Checklist are consistent with the General Plan, and were analyzed and accounted for in the General Plan EIR.

- Biological Resources Analysis Report;
- Preliminary Geotechnical Engineering Report;
- Phase 1 Environmental Site Assessment Report;
- Shallow Soil Investigation Report;
- The CLSP Phase 2 Document;
- Acoustical Assessment;
- Air Quality-Health Risk Assessment Technical Report;
- Traffic Impact Analysis; and
- Ashley Furniture Project CalEEMod output file.

The Environmental Analysis includes a discussion and analysis of any peculiar or site-specific environmental impacts associated with adoption of the Municipal Code and Zoning Map Update, adoption of the CLSP Phase 2 Amendment, and construction and operation of the proposed Ashley Furniture Project.

The Environmental Analysis identifies whether or not each CEQA Appendix G environmental checklist question, and its corresponding impacts, were adequately addressed in the 2022 Lathrop General Plan EIR, if there is a significant impact due to new information, or if the project would result in a significant impact peculiar to the project site that was not adequately addressed in the General Plan EIR.

The Environmental Analysis identifies the applicable City of Lathrop development standards and policies that would apply to the proposed project during both the construction and operational phases, identifies applicable minimization measures from the General Plan EIR that must be implemented, identifies applicable state-level standards and policies that would ensure that no peculiar or site-specific environmental impacts would occur.

The Environmental Analysis concluded that the proposed project is consistent with the land uses and development intensities assigned to the project site by the General Plan.

Impacts from buildout of the General Plan including cumulative impacts associated with development and buildout of the CLSP Phase 2 plan area and the Ashley Furniture Project, as proposed, were fully addressed in the General Plan EIR (State Clearinghouse No. 2021100139), and implementation of the proposed project would not result in any new or altered impacts beyond those addressed in the General Plan EIR.

All project requirements identified in the Environmental Checklist are incorporated in project Consolidated Conditions of Approval (Attachment 3). The Environmental Checklist is attached to this Staff Report as Attachment 10.

RECOMMENDATION:

The Planning Commission and staff recommend that the City Council consider all information provided and submitted, take and consider all public testimony and, if determined to be appropriate, adopt a Resolution to Find the Project Exempt from Further Environmental Review Pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 and Adopt a Resolution to Approve a Conditional Use Permit and Site Plan Review for the Ashley Furniture Project.

FISCAL IMPACT:

All application processing fees and costs are charged to the applicant. The request has no fiscal impact to the City.

APPROVALS:

David Niskanen — 10/31/2023
Contract Planner — Date

John B. Anderson — 10/31/2023
Contract Planner — Date

Rick Caguiat — 10/31/23
Community Development Director — Date

Salvador Navarrete — 10·31·2023
City Attorney — Date

Stephen J. Salvatore — 11·6·23
City Manager — Date

ATTACHMENTS:

1. City Council Resolution to Find the Project Exempt from Further Environmental Review Pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183
2. City Council Resolution to Approve a Conditional Use Permit and Site Plan Review for the Ashley Furniture Project
3. Consolidated Conditions of Approval, dated September 13, 2023
4. Vicinity Map
5. Project Description
6. Architectural Plans
7. Preliminary Civil Plans
8. Preliminary Landscape Plan
9. Perspective Views/Renderings
10. Environmental Checklist, prepared by De Novo Planning Group, dated August, 2023 with Appendices
11. Planning Commission Resolution No. 23-13 Recommending City Council Approval
12. Comment Letter, dated September 13, 2023, from Lozeau Drury LLP regarding the Ashley Furniture Project
13. Comment Letter, dated October 6, 2023, from Lozeau Drury LLP regarding the Ashley Furniture Project
14. Comment Letter, dated September 28, 2023, from Manteca Unified School District (MUSD) regarding the Ashley Furniture Project
15. Response to Lozeau Drury LLP letter dated October 6, 2023 regarding the Ashley Furniture Project

RESOLUTION NO. 23-

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LATHROP FINDING THE PROJECT EXEMPTION FROM FURTHER ENVIRONMENTAL REVIEW PURSUANT TO PUBLIC RESOURCES CODE SECTION 21083.3 AND CEQA GUIDELINES SECTION 15183 (CUP-23-08 AND SPR-23-09)

WHEREAS, the City of Lathrop City Council held a duly noticed public hearing to consider the Conditional Use Permit and Site Plan Review pursuant to the General Plan and Lathrop Municipal Code; and

WHEREAS, the request is for approval of a Conditional Use Permit and Site Plan Review to allow the construction of an approximately 1.5 million square foot concrete tilt-up building and all necessary supporting infrastructure on a property located within the Central Lathrop Specific Plan Phase 2 Amendment area as further defined below in the third recital (the proposed Project or the Project); and

WHEREAS, the property is located at 14101 S. Manthey Road (APN: 192-020-14) (the property); and

WHEREAS, prior to the City's approval of the 2022 General Plan Update, the City prepared an Environmental Impact Report (EIR) which analyzed the environmental impacts of buildout under the General Plan Update pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et. seq.), and the City of Lathrop City Council certified the Final EIR on September 19, 2022 (State Clearinghouse #2021100139); and

WHEREAS, the analysis in the General Plan Update EIR allows the use of CEQA exemption/streamlining provisions for projects under the General Plan Update, including the proposed Project; and

WHEREAS, an Environmental Checklist has been prepared for the proposed Project, which is attached to the City Council Staff Report as Attachment 9 and can also be found in the Planning Division project files located at 390 Towne Centre Drive, Lathrop, CA 95330; and

WHEREAS, the City Council finds that the proposed Project is consistent with the Limited Industrial land use goals and policies of the City of Lathrop General Plan and is also consistent with the development standards for the IL-CL, Limited Industrial Zoning District and the Central Lathrop Specific Plan Phase 2 Amendment as further implemented through the Zoning Code Text Amendment; and

WHEREAS, the City of Lathrop Planning Commission held a duly noticed public hearing on September 13, 2023, to consider the proposed Project and after reviewing and considering all information provided and submitted, and after taking and considering all public testimony adopted Resolution No. 23-13 recommending City Council find the Project exempt from further environmental review pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183; and

WHEREAS, proper notice of this public hearing was given in all respects as required by law including the publishing of a legal notice of the hearing in the Manteca Bulletin on or about September 29, 2023 and mailed out to property owners located within a 300-foot radius from the project site boundary on September 29, 2023, emailed to the City's Public Hearing subscribers and interested parties and posted at three (3) locations accessible to the public and the City website; and

WHEREAS, the City Council has utilized its own independent judgement in adopting this Resolution.

NOW THEREFORE, BE IT RESOLVED that the City Council of the City of Lathrop does hereby make the following findings:

Section 1. California Environmental Quality Act (CEQA) Findings. Pursuant to Public Resources Code section 21083.3 and CEQA Guidelines section 15183, the City Council finds and determines as follows:

a. The project complies with CEQA based on the CEQA exemption/streamlining provisions contained in Public Resources Code section 21083.3 and CEQA Guidelines section 15183;

b. Pursuant to the City Council Staff Report and the attachments and exhibits thereto, including but not limited to, the CEQA Environmental Checklist, which are incorporated herein by reference, the proposed Project will not result in any significant impacts that: 1) are peculiar to the project or project site; 2) were not identified as significant project-level, cumulative, or off-site effects in the General Plan Update EIR; or 3) were previously identified significant effects, which as a result of substantial new information that was not known at the time that the General Plan Update EIR was certified, are determined to have a more severe adverse impact than discussed in the General Plan Update EIR. As a result, pursuant to Public Resources Code section 21083.3 and CEQA Guidelines section 15183, the proposed Project is exempt from further environmental review under CEQA.

c. All applicable General Plan Update policy and implementation actions and uniformly applied development policies, standards and/or regulations are, hereby imposed on the proposed Project and must be adhered to by the Project applicant.

To the extent the City has not previously made findings regarding any/all of these referenced General Plan policy and implementation actions and uniformly applied development policies, standards and/or regulations, the City Council finds that all of those General Plan Update policy and implementation actions and uniformly applied development policies, standards and/or regulations, were adopted, in whole or in part, to substantially mitigate the potential environmental effects to which they pertain (i.e., aesthetics, agricultural and forest resources, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gases, climate change, and energy, hazards and hazardous materials, hydrology and water quality, land use, population, and housing, mineral resources, noise, public services and recreation, circulation, utilities and service systems, and wildfire).

Section 2. Based on the findings set forth in this Resolution and the evidence in the Staff Report, the City Council hereby find the Project Exempt from Further Environmental Review Pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 as illustrated and incorporated by reference as Attachment 10 of the City Council Staff Report.

BE IT FURTHER RESOLVED that the City Council of the City of Lathrop, based on substantial evidence in the administrative record of proceedings, its above findings, including the staff report and associated attachments, pursuant to its independent review and consideration, does hereby find the Project exempt from further environmental review pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183.

The foregoing resolution was passed and adopted this 13th day of November 2023 by the following vote of the City Council, to wit:

AYES:

NOES:

ABSTAIN:

ABSENT:

SIGNED:

____
Sonny Dhaliwal, Mayor

ATTEST:

____
Teresa Vargas, City Clerk

APPROVED AS TO FORM:

____
Salvador Navarrete, City Attorney

RESOLUTION NO. 23-

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LATHROP APPROVING A CONDITIONAL USE PERMIT AND SITE PLAN REVIEW FOR THE ASHLEY FURNITURE PROJECT (CUP-23-08 AND SPR-23-09)

WHEREAS, the City of Lathrop City Council held a duly noticed public hearing to consider the Conditional Use Permit and Site Plan Review pursuant to the General Plan and Lathrop Municipal Code; and

WHEREAS, the request is for approval of a Conditional Use Permit and Site Plan Review to allow the construction of an approximately 1.5 million square foot concrete tilt-up building and all necessary supporting infrastructure on a property located within the Central Lathrop Specific Plan Phase 2 Amendment area as further defined below in the third recital (the proposed Project or the Project); and

WHEREAS, the property is located at 14101 S. Manthey Road (APN: 192-020-14) (the property); and

WHEREAS, prior to the City's approval of the 2022 General Plan Update, the City prepared an Environmental Impact Report (EIR) which analyzed the environmental impacts of buildout under the General Plan Update pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et. seq.), and the City of Lathrop City Council certified the Final EIR on September 19, 2022 (State Clearinghouse #2021100139); and

WHEREAS, the analysis in the General Plan Update EIR allows the use of CEQA exemption/streamlining provisions for projects under the General Plan Update, including the proposed Project; and

WHEREAS, an Environmental Checklist has been prepared for the proposed Project, which is attached to the City Council Staff Report as Attachment 10 and can also be found in the Planning Division project files located at 390 Towne Centre Drive, Lathrop, CA 95330; and

WHEREAS, prior to approval of the Project, the City Council adopted a Resolution to find the Project exempt from further environmental review pursuant to Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183; and

WHEREAS, the City Council finds that the proposed Project is consistent with the Limited Industrial land use goals and policies of the City of Lathrop General Plan and is also consistent with the development standards for the IL-CL, Limited Industrial Zoning District and the Central Lathrop Specific Plan Phase 2 Amendment as further implemented through the Zoning Code Text Amendment; and

WHEREAS, the City of Lathrop Planning Commission held a duly noticed public hearing on September 13, 2023, to consider the proposed Project and after reviewing and considering all information provided and submitted, and after taking and considering all public testimony adopted Resolution No. 23-13 recommending City Council approval of the proposed Project; and

WHEREAS, proper notice of this public hearing was given in all respects as required by law including the publishing of a legal notice of the hearing in the Manteca Bulletin on or about September 29, 2023 and mailed out to property owners located within a 300-foot radius from the project site boundary on September 29, 2023, emailed to the City's Public Hearing subscribers and interested parties and posted at three (3) locations accessible to the public and the City website; and

WHEREAS, the City Council has utilized its own independent judgement in adopting this Resolution.

NOW THEREFORE, BE IT RESOLVED that the City Council of the City of Lathrop does hereby make the following findings:

Section 1. Conditional Use Permit Findings. Pursuant to Section 17.112.060 of the Lathrop Municipal Code (LMC), the City Council finds as follows:

a. That there are circumstances or conditions applicable to the land, structure or use which makes the granting of a use permit necessary for the preservation and enjoyment of a substantial property right. *The proposed Project represents a major expansion of the existing Ashley Furniture Distribution Center and Retail Outlet located on S. Harlan Road. The proposed Project is consistent with the City's development standards for Limited Industrial.*

b. That the proposed location of the conditional use is in accordance with the objectives of the zoning code and the purposes of the district in which the site is located. *The proposed Project is located in the IL-CL, Limited Industrial Zoning District and the Central Lathrop Specific Plan Phase 2 Amendment area and is a permitted use within the zoning district for which it is located as further established in the Zoning Code Text Amendment.*

c. That the proposed use will comply with each of the applicable provisions of the LMC, as amended. *As noted above and as described in the Staff Report, the proposed Project is a permitted use in the IL-CL, Limited Industrial Zoning District and is consistent with the applicable provisions in the LMC, including screening requirements pursuant to the Central Lathrop Specific Plan Phase 2 Amendment. Additionally, the General Plan requires updates to the LMC and Central Lathrop Specific Plan Phase 2 in order to ensure that new development is compatible with existing development (Goal LU-5).*

The proposed Project is consistent with the LMC, Policies and Implementation Actions of the General Plan as it relates to truck traffic impacts and land use compatibility.

Section 2. Site Plan Review Findings. Pursuant to Section 17.100.050 of the Lathrop Municipal Code (LMC), the City Council finds as follows:

a. The proposed Site Plan Review complies with all applicable provisions of Chapter 17.100;

b. The proposed Site Plan Review is consistent with the site improvements listed in Chapter 17.100 (a. through i.) and improvements are such that traffic congestion is avoided and pedestrian and vehicular safety and welfare are protected and there will not be adverse effects on surrounding properties;

c. Proposed lighting for the project area is so arranged as to deflect away from adjoining properties; and

d. The proposed Site Plan Review is compatible with surrounding land uses and will not be detrimental to the health, safety and general welfare of the City as further evaluated in the Environmental Checklist.

Section 3. Based on the findings set forth in this Resolution and the evidence in the Staff Report, the City Council hereby approve Conditional Use Permit No. CUP-23-08 and Site Plan Review No. SPR-23-09 subject to the Consolidated Conditions of Approval as illustrated and incorporated by reference as Attachment 3 of the City Council Staff Report.

BE IT FURTHER RESOLVED that the City Council of the City of Lathrop, based on substantial evidence in the administrative record of proceedings, its above findings, including the staff report and associated attachments, pursuant to its independent review and consideration, does hereby approve Conditional Use Permit No. CUP-23-08 and Site Plan Review No. SPR-23-09, subject to the Consolidated Conditions of Approval listed in Attachment 3 of the November 13, 2023 City Council Staff Report and incorporated by reference herein

The foregoing resolution was passed and adopted this 13th day of November 2023 by the following vote of the City Council, to wit:

AYES:

NOES:

ABSTAIN:

ABSENT:

SIGNED:

____

Sonny Dhaliwal, Mayor

ATTEST:

____

Teresa Vargas, City Clerk

APPROVED AS TO FORM:

____

Salvador Navarrete, City Attorney

City Lathrop

ATTACHMENT " 3 "

Community Development Department – Planning Division

Amended Consolidated Conditions of Approval

September 13, 2023

Project Name: Ashley Furniture Project

File Number: Conditional Use Permit No. CUP-23-08 and Site Plan Review No. SPR-23-09

Project Address: 14101 S. Manthey Road (APN: 192-020-14)

The following list of conditions shall be incorporated into the final construction plans and development phases of the project. The list of conditions are not intended to be all-inclusive or a comprehensive listing of all City or district regulations. Please note that additional comments and/or conditions may be added pending the response to the comments noted below and/or changes to the proposed project. The following comments and conditions of approval are based on the application and diagrams dated May, 2023.

PROJECT DESCRIPTION

Approval of this project authorizes the construction of a 1,486,607 sq. ft. concrete tilt-up building on a 89.82-acre property located at the northwest corner of Dos Reis Road and Manthey Road and within the Central Lathrop Specific Plan Phase 2 Amendment area. The proposed building will include an up to three-story, 24,000 sq. ft. office, an up to two-story 110,260 sq. ft. retail outlet and showroom and a 1,352,347 sq. ft. warehouse distribution center. The project includes related on- and off-site improvements, including but not limited to off-street parking, lighting, landscaping, solid wall and wrought iron fencing, outdoor employee break area, paving, and street improvements (landscaping, curb, gutter, and sidewalk

CEQA DETERMINATION

Exempt in accordance with Section 21083.3 of the Public Resources Code and Section 15183 of the California Environmental Quality Act (CEQA) Guidelines.

PLANNING

1. The project is subject to and shall comply with the Project Requirements resulting from the Environmental Checklist prepared by De Novo Planning Group. The Project Requirements are incorporated by reference into this list of conditions (attached).
2. The Conditional Use Permit and Site Plan Review shall not be in effect until the Rezone that is part of the City's Zoning Consistency Project and Central Lathrop Specific Plan (CLSP) Phase 2 Amendment are approved and in effect.
3. Signs (Directional Signs) shall be placed on-site directing trucks north on S. Manthey Road towards Roth Road from the site. Signage shall be maintained by the applicant/property owner and replaced if damaged, destroyed or otherwise unreadable. Signage shall be reviewed and approved by the Planning Division.

4. Sign(s) shall be placed in the drivers' lounge and/or breakroom associated with the project building directing trucks north on S. Manthey Road toward Roth Road from the site. The sign shall illustrate the Truck Route to and from the site, the City's Truck Route Map and a reference to Chapter 10.16, *Truck Routes and Commercial Vehicles* of the Lathrop Municipal Code (LMC).

5. Evergreen trees planted along Dos Reis Road for the purposes of screening shall be in compliance with the CLSP Phase 2 Amendment.

6. Outdoor employee break area(s) shall include trash receptacles, shade structure(s), and seating areas. The final design and location of employee break area(s) shall be subject to review and approval by the Planning Division.

7. Passenger vehicle entryways shall include enhanced paving materials, such as herringbone design or stamped concrete. The extent of the enhanced paving materials shall be subject to review and approval by the Planning Division.

8. Interior truck operator lounge(s) and/or employee break area(s) shall include on-site amenities, such as restrooms, vending machines, air conditioning, seating areas, etc. The truck operator lounge(s) and/or employee break area(s) shall be subject to review and approval by the Planning Division.

9. With the exception of parking and storage of truck cabs and truck trailers, storage containers, and temporary load transfers, outdoor storage is prohibited, unless otherwise reviewed and approved by the Planning Division.

10. Installation of driveway entry/security gates or interior site fencing shall subject to review and approval by the Planning Division, Building Department and Lathrop Manteca Fire District prior to installation. All driveway entry/security gates shall provide truck queuing in front of the gate of at least seventy-five (75) feet in order to allow trucks with trailers to pull onto the site without blocking adjacent street rights-of-ways.

11. The security gate building (guard shack) shall be architecturally compatible with the primary building as it relates to color, aesthetic, and material.

12. On-site fencing shall be maintained and in good working order for the life of the project. Damage and/or wear-and-tear shall be repaired by the applicant/property owner in a timely manner.

13. Prior to any ground disturbance, the project shall consult with the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) for biological coverage, mitigation and participation in the plan. Participation in the SJMSCP satisfies requirements of both the State and Federal endangered species acts, and ensures that the impacts are mitigated below a level of significance in compliance with the California Environmental Quality Act (CEQA).

14. The applicant shall coordinate with the San Joaquin Valley Air Pollution Control District to comply with District rules and regulation including but not limited to Rule 9510, Indirect Source Review. The applicant shall provide proof of compliance prior to building permit issuance.

15. The project shall comply with applicable site development provisions contained in the Central Lathrop Specific Plan Phase 2 Amendment Design Guidelines and Lathrop Municipal Code including but not limited to parking, lighting, landscaping, etc.

16. All areas not used for structures, parking, driveways, walkways, or other hardscape shall be landscaped and maintained by the property owner per Section 17.92.030(A)(1) of the Lathrop Municipal Code to the satisfaction of the City.

17. The applicant shall submit appropriate plans to the Community Development Department for plan check and building permit. Final site plan, elevation, landscaping and irrigation, exterior lighting and site improvement plans and details, etc. shall be reviewed and approved by the Planning Division. Any significant change or modification to the approved plan is subject to review and approval by the Community Development Director.

18. Landscaping and irrigation must be consistent with the City's Water Conservation Requirements (LMC 17.92.060) and the State Water Efficient Landscape Ordinance (AB 1881). The applicant shall include with the landscape and irrigation plan a water efficient landscape worksheet with water budget calculations identifying the water allowance and estimated water use.

19. The applicant/property owner shall ensure the entire site including landscaping areas shall be maintained in a healthy, weed free condition to the satisfaction of the City.

20. Trash enclosure(s) shall include but not be limited to a covered roof, metal gate and have three solid walls. Details and/or alternative designs or location shall be subject to review and approval of the Planning, Building, and Public Works Department. The trash enclosure design, material and color shall match or compliment the main building.

21. It shall be the responsibility of the applicant/property owner to ensure that any building or parking area lighting including security lighting associated with the project, be arranged so as to not cast light onto adjoining properties.

22. A final site lighting photometric plan with detailed specifications of all lighting fixtures, poles, and wall packs as well as a manufacture's catalog sheet containing photometric data, shall be submitted with Building Permits for City review and approval. Parking lots, driveways, trash enclosure/areas shall be illuminated during the hours of darkness with a minimum maintained one foot-candle of light and an average not to exceed four foot-candles of light. The illumination shall not exceed ten (10) foot-candles in any one location.

23. No signs are approved for this project. A Master Sign Program for the project shall be prepared and submitted for review and approval by the Planning Division per Chapter 17.84 of the Zoning Code. All signs shall require a Planning Division Sign Design application and a separate Building Permit application, subject to review and approval of the Planning and Building Divisions.

24. Bicycle parking shall be installed consistent with Chapter 17.76.120 of the LMC. In accordance with LMC Section 17.76.120(D), the proposed project shall provide changing facilities for employees/workers utilizing bicycle to get to and from the use and bicycle lockers in a secure room equal to the minimum number of bicycle parking stalls required by Chapter 17.76. Bicycle lockers should be in close proximity to the employee entrance. The final location(s) shall be subject to review and approval by the Planning Division. The secure room shall include electrical outlets for the purpose of charging electric bicycles (e-bikes).

25. Roof-mounted mechanical equipment shall be screened and not visible from the public right-of-way. Screening materials shall be compatible with the architectural style, materials and color of the building upon which the equipment is located, subject to the approval of the Community Development Director or designee.

26. Ground-mounted equipment that is not required to be visible, shall be screened not visible from the public right-of-way using the most practical means of screening, such as landscaping, a freestanding wall/fence, matching paint, subject to approval of the Community Development Director or designee.

27. Unless otherwise specified, all conditions of approval shall be complied with prior to the issuance of any Building Permits.

28. The Site Plan shall expire thirty-six (36) months from the date of approval unless a time extension is granted consistent with the policies and procedure of the Lathrop Municipal Code. Prior to the expiration date of August 30, 2026 a building permit must be issued and construction commenced and diligently pursued toward completion of the site or structures.

29. In the event clarification is required for an interpretation of these Conditions of Approval, the Community Development Director and City Engineer shall have the authority either to administratively clarify the intent and wording of these Conditions of Approval without the requirement of a public hearing or to refer questions regarding the interpretation of these Conditions of Approval to the Planning Commission. If the applicant take issue with the clarification provided administratively, the applicant shall have the right to appeal the administrative clarification to the Planning Commission. The Community Development Director and City Engineer shall also have the authority to make minor modifications to these conditions provided a request is made in writing by the applicant and it is determined such modifications are consistent with and in furtherance of the underlying intent of the condition being modified.

30. The City of Lathrop may conduct annual and or spot inspections to ensure that compliance with the required site improvements and conditions are being maintained.

31. The applicant shall install an eight (8) foot high chain link fence with vinyl privacy slats (black powder coated) along the western property line to screen the outdoor storage areas.

BUILDING

1. All construction associated with this project shall comply with the most recent adopted City and State building codes.

2. Special Inspections – As indicated by California Building Code Section 1704, the property owner/developer shall employ one or more special inspectors who shall provide special inspections when required by CBC section 1704. The property owner/developer shall contact the Building Department at time of plan submittal to obtain application for special inspections.

3. The Title Sheet of the plans shall include:

Occupancy Group	Type of Construction
Occupant Load	Height of Building
Description of Use	Floor area of building(s) by occupancy group
Area Analysis	Code Used

4. The property owner/developer shall be responsible for payment of school impact fees prior to the issuance of a building permit.

5. Dimensioned building setbacks and property lines, street centerlines and distances between buildings and structures shall be provided on the project site plan.

6. The project shall be designed to conform with energy conservation measures articulated in Title 24 of the California Code of Regulations and address measures to reduce energy consumption such as flow restrictors for toilets, low consumption light fixtures, and insulation and shall use to the extent feasible draught landscaping.

7. All property lines and easements shall be shown on the site plan. A statement shall be provided that indicates such lines and easements are shown is required.

8. Public and private site improvements shall be designed in accordance with the Americans with Disabilities Act and Chapter 11 of the California Building Code. The site plan shall include a site accessibility plan identifying exterior routes of travel and detailing running slope, cross slope, width, pedestrian ramp, curb ramps, handrails, signage and truncated domes. The path of travel shall be provided from the public right of way and accessible parking to building. The design professional shall ensure that the site accessibility plan is in compliance with the latest Federal and State regulations. A site accessibility plan shall be required per the attached policy from the link below:
https://www.ci.lathrop.ca.us/sites/default/files/fileattachments/building_division/page/24708/site_accessibility_plan_requirements.pdf

9. At the time of building permit application submittal a design professional shall be required to prepare the formal construction plans for proposed improvements per the Business and Professions' Code.

10. Grading and Site Improvement permits from Public Works may be required separately from the accessibility plan in compliance with item 8.

PUBLIC WORKS

Land

1. The applicant shall dedicate all right-of-way (ROW) necessary for the ultimate ROW width as represented in the approved Improvement Plans. A 10-foot public utility easement (PUE) shall also be dedicated along all ROW frontages.

Public/Frontage Improvements

1. The applicant shall submit an encroachment permit for all work within the public right-of-way and City owned or controlled property.

2. The applicant shall be required to install full street frontage improvements along all frontages of the parcel being developed or improved. Frontage improvements shall include but are not limited to curb, gutter, sidewalk, street lights, hydrants, asphalt concrete paving, striping, driveways, and landscaping. The extent of paving shall include one-half ultimate street width or as otherwise stated in the City of Lathrop Municipal Code. The applicant shall submit the off-site plans for approval along with the applicable plan check and inspection fees.

3. The applicant shall underground all existing and new overhead utilities on both sides of the frontage street in compliance with the Lathrop Municipal Code. Overhead power lines in excess of 34.5 KVA are not required to be undergrounded.

4. As recommended in the TJKM Traffic Impact Analysis Report, the applicant shall complete the following improvements prior to issuance of a certificate of occupancy, including a temporary certificate of occupancy:

    a. Lathrop Road/I-5 SB Ramps: Optimize signal timing to achieve an acceptable level of service. Align signal timing with coordination plan for the Lathrop Road corridor.

b. Golden Valley Parkway & Spartan Way/Lathrop Road Intersection: Grind existing striping, slurry seal extents of striping and restripe the following configuration to City Standards:

    i. NB Approach: One left-turn lane, one through lane, two right-turn lanes
    ii. SB Approach: Two left-turn lanes, two through lanes, one right-turn lane
    iii. EB Approach: One left turn-lane, two through lanes, one right-turn lane
    iv. WB Approach: Two left-turn lanes, two through lanes, one right-turn lane

5. The TJKM Traffic Impact Analysis Report found that the Lathrop Road/I-5 NB Ramp will degrade from LOS E to LOS F with the Project in the Baseline plus Project condition, which will require the construction of a 400 foot separate right turn lane on the NB Ramp. The applicant shall conduct current traffic counts for the NB Ramp to confirm the baseline condition and complete a technical memorandum to document the findings of the traffic counts. If the results of the technical memorandum indicate that the impact is negligible or that the level of service does not degrade below LOS D in the Current Baseline plus Project condition, the project shall not be required to construct the 400 foot separate right turn lane on the NB Ramp. If the results of the traffic counts indicate that the project operations would cause the LOS to degrade below a LOS D with the Project, the applicant shall be required to construct the 400 foot separate right turn lane on the NB Ramp. If the improvements are required, applicant shall design, estimate construction cost and provide performance and labor & materials guarantee to the City for the improvements and enter into a deferred frontage improvement agreement with the City prior to issuance of a building permit for the Project. If required, the applicant shall work towards construction of the improvements in a timely manner for completion as close to the occupancy of the Project as possible.

6. The applicant shall be required to improve Golden Valley Parkway from Spartan Way to Dos Reis Road. Golden Valley Parkway is currently improved from Spartan Way to about 240 feet south of Does Reis Road and includes utilities, curb & gutter, and bottom lift pavement and subgrade. The applicant shall be required to complete the improvements on Golden Valley Parkway to include but not limited to sidewalk, top lift pavement, striping, signing, landscaping and lighting. The improvements are eligible in part for City Transportation Capital Facility Fee (CFF) credit or reimbursement as portions are included in the existing City CFF program and this roadway provides a regional benefit.

7. The applicant shall be required to construct a roundabout at the intersection of Golden Valley Parkway and Dos Reis Road. The roundabout shall be an enhanced gateway to the CLSP Phase 2 area and shall include components such as monumentation, art, enhanced landscaping, lighting, etc. The roundabout shall include safety improvements such as pedestrian actuated flashing warning signs. The final design shall be approved by the City Engineer. The applicant shall submit the roundabout plans for approval as part of the offsite improvement plans.

8. The applicant shall be required to abandon and barricade Manthey Road between Lathrop Road and Dos Reis Road upon completion of the improvement of Golden Valley Parkway. This abandonment is necessary to facility the proper traffic circulation for the project.

9. The applicant shall be required to install signage on Lathrop Road, Spartan Way, Golden Valley Parkway, Dos Reis Road and Manthey Road south of Dos Reis Road prohibiting trucks from utilizing these roadways. Location and size of the signage shall be reviewed and approved by the City Engineer prior to issuance of an occupancy permit.

10. Applicant shall comply with Chapter 10.16, *Truck Routes and Commercial Vehicles* of the LMC.

11. The applicant shall construct a raised "pork chop" with bollards at the northeast corner of Spartan Way and Golden Valley Parkway to discourage semi-trucks from making a right-turn towards the Central Lathrop Specific Plan (CLSP) Phase 2 area. The design of the improvements shall be reviewed and approved by the City Engineer and must be installed prior to the issuance of a Certificate of Occupancy.

12. The applicant shall construct a raised median on S. Manthey Road adjacent to the truck driveway at the facility to discourage trucks from making a left turn in and a right turn out of the facility. The design of the improvements shall be reviewed and approved by the City Engineer and must be installed prior to the issuance of a Certificate of Occupancy.

Wastewater

1. The applicant shall be required to connect to the City sewer system prior to certificate of occupancy for the first building within the project.

2. The applicant shall secure sufficient sewer capacity for the project and pay all connection fees and reimbursements.

3. The project will connect to the existing Central Lathrop Phase 1 gravity sewer main system and the wastewater will be conveyed to the City's Treatment Plan by use of the existing Central Lathrop Phase 1 wastewater pump station and force mains. The applicant shall provide calculations to the City Engineer proving that these existing facilities can support the additional wastewater discharge from the project and shall install any improvements needed to accommodate the project if the existing facilities are deficient.

Potable Water

1. The applicant shall be required to connect to the water utility for domestic supply prior to certificate of occupancy and pay all applicable connection fees. All existing groundwater wells on site shall be abandoned under a permit from San Joaquin County prior to connecting potable water to the site.

2. The applicant shall secure sufficient water capacity for the project and pay all connection fees and reimbursements.

3. The project will connect to the existing Central Lathrop Phase 1 potable water system. The applicant shall provide calculations to the City Engineer proving that these existing facilities can support the projects needs and shall install any improvements needed to accommodate the project if the existing facilities are deficient.

Recycled Water

1. Applicant shall install recycled water mains along all frontages if not existing. All public landscaping shall be irrigated with recycled water and a recycled water hydrant shall be placed in an accessible location along the frontage to provide a filling station for street sweeping activities and construction.

2. All recycled water points of connection for irrigation require the installation of a recycled water meter.

Storm Drain

1. The applicant shall be required to connect to storm drain utility and pay all applicable connection fees.

2. Hydrology and hydraulic calculations and plans for on-site and off-site storm drainage systems shall be submitted to the City for review and approval.

3. As part of their onsite improvements, the applicant shall install all necessary Best Management Practices (BMP's) for post construction in accordance with City guidelines and standards. The BMP's must be in place prior to final occupancy for the project.

4. The applicant shall execute a maintenance agreement for all onsite storm water quality treatment devices, swales, and/or ponds.

5. The project will connect to the existing Central Lathrop Phase 1 storm water system for Watershed 4. The applicant shall provide calculations to the City Engineer proving that these existing facilities can support the projects needs and shall install any improvements needed to accommodate the project if the existing facilities are deficient.

General

1. The applicant shall retain the services of a California licensed civil engineer to design the project utility plans for sewer, water, storm drain lines and systems.

2. The applicant shall ensure that all off-site and on-site improvements comply with City Standards as illustrated on the approved Improvement Plans.

3. All on-site water, sewer, and storm drain systems that are privately owned shall be maintained by the property owner.

4. The parking areas and drive aisles on site shall be paved with asphalt concrete.

5. The project shall comply with the Multi-Agency Post Construction Storm Water Manual.

6. Grading and other construction activities that may cause dust shall be watered to control dust at the City Engineer's direction. A water vehicle shall be available eon site for dust control operations at all times during grading operations. The adjacent public street shall be kept free and clean of any project dirt, mud, materials, and debris.

7. The applicant shall pay all appropriate fees including, but not limited to, North Lathrop Transportation Fee, Levee Impact Fee, Capital Facilities Fees, and Plan Check and Inspection Fees.

8. A geotechnical report shall be submitted for the project, which includes groundwater elevations, percolation rates for retention basins, soil compaction requirements, and recommendations for asphalt paving and concrete. Building PAD certification is required from Geotechnical Engineer and/or Special Inspector.

9. All water meters shall be installed within the public right of way or public utility easement. The City shall not be the responsible party for maintaining water and sewer lines beyond existing main line stub outs or on private property, unless otherwise agreed to by the City.

10. The applicant has the option to enter into a reimbursement agreement with the City for construction cost reimbursement of any infrastructure that provides regional benefit.

11. All improvements shall be designed and constructed per the most current City Standards.

12. The applicant shall create or participate in a Community Facilities District (CFD) to fund the maintenance of all public infrastructure prior to issuance of the first building permit associated with the project.

13. If the project is greater than one acre; the applicant shall complete a SWPPP, obtain a WDID number and list the number on the improvement plans, and submit the SWPPP to the City for review and approval.

LATHROP-MANTECA FIRE DISTRICT (LMFD)

1. The project shall conform to the most currently adopted edition of the California Fire Code and all related standards.
2. Permits shall be obtained from the fire code official. Permit(s) and fees, shall be paid prior to issuance of any and/or all permits. Issued permits shall be kept on the premises designated therein at all times and shall be readily available for inspection by the fire code official. (Permits are to be renewed on an annual basis).
3. Depending on the proposed Occupancy Type & fire area occupant load, Automatic Fire Sprinklers may be required. In the case where automatic fire sprinkler systems are required, such systems shall comply with California Fire Code Section 903.2 and the Tenant/Occupant/Owner shall have the responsibility to ensure that the correct fire suppressions system is added/modified/tested and accepted by the (AHJ) Fire District for review and approval prior to modification. Deferred submittal accepted.
4. All residential structures shall be Fire Sprinkler protected, as per the City of Lathrop's Fire Sprinkler Ordinance, California Fire Code, California Residential Code, and the California Building Standards Codes. Fire suppression system plans shall be modified under separate fire permit and shall be submitted by a licensed fire contractor, to the (AHJ) Fire District for review and approval prior installation. Deferred plan submittals are accepted.
5. Fire Sprinkler System alterations and plans shall be submitted directly to LMFD.
6. Fire Alarm System upgrades and plans shall be submitted directly to LMFD.
7. A means of Ingress and Egress Plan shall be submitted with the project Tenant Improvement Plans.
8. An approved fire alarm system shall be installed in accordance with CFC §907.2 and NFPA 72.
9. Fire Department Development Impact Fees for all new buildings shall be paid in accordance with the City of Lathrop Municipal Code and Resolutions of the adopted fee schedule.
10. An approved Fire Flow test shall be conducted prior to ground breaking to determine allowable Fire Fighting capabilities for the site.
11. An approved water supply for fire protection, either temporary or permanent, shall be made available prior to commencing construction beyond the foundation stage, or as soon as combustible material arrives on the site.
12. Deferred Plan Submittals for Fire Alarm, Fire Sprinklers and Fire Underground shall be submitted directly to LMFD.

13. Fire apparatus access roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all-weather driving capabilities. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, except for approved security gates in accordance with California Fire Code (CFC) Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115 mm). Adequate turnaround shall be provided per City of Lathrop Standards and Appendix D of the 2022 CFC.

14. Where access to the development is restricted because of secured openings or where immediate access is necessary for life-saving or fire-fighting purposes, a key "knox" box is required to be installed in an approved location. The key "knox" box shall be of an approved type and shall contain keys to gain necessary access as required by the fire code official. In addition to key "knox" box(es), any automatic gates shall have Opticom access ability to provide necessary access for emergency apparatus.

15. Where a portion of the added street is constructed more than 200 feet (61 meters) from a hydrant on a fire apparatus access road, as measured by an approved route, the developer shall provide an additional fire hydrant and main shall be provided. NOTE: The developer shall provide exact locations and distances of existing hydrants in the area. (CFC Appendix C, and City of Lathrop Water System Standards).

16. The developer shall be responsible for providing approved vehicle access for firefighting to all construction and demolition sites. Vehicle access shall be provided to within 100 feet (30,480 mm) of temporary or permanent fire department connections. Vehicle access shall be provided by either temporary or permanent roads, capable of supporting vehicle loading under all weather conditions. Vehicle access shall be maintained until permanent fire apparatus access roads are available.

17. The Fire Department Fire Access Roads shall meet the requirements established by the San Joaquin County Fire Chief's Association.

18. The turning radius for his project shall be a minimum of 41 feet for all Emergency Fire Apparatus.

19. Buildings exceed 30 feet in height shall have a minimum unobstructed fire apparatus access width of 26 feet.

20. Commercial cooking equipment that produce grease laden vapors shall be provided with a Type I Hood, in accordance with the California Mechanical Code, and automatic fire extinguishing system that is listed and labeled for its intended use as follows:

    a. Wet chemical extinguishing system, complying with UL 300
    b. Carbon dioxide extinguishing systems
    c. Automatic fire sprinkler systems

21. Where a portion of the facility or building hereafter constructed or moved into or within the jurisdiction is more than 400 feet (122 meters) from a hydrant on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains shall be provided where required by the fire code official.

22. At LMFD's discretion the proposed project may be subject to other fire & life safety requirements at the time of building plan review.

23. Final approval is subject to field inspections. A minimum 48 to 72-hour notice is required prior to any life-safety fire inspections. Other conditions may apply at time of inspections and are subject to correction.

LATHROP POLICE DEPARTMENT (LPD)

1. The applicant shall paint the address on the roof top for each individual building. The numbers shall be at least 3 feet tall, 2 feet wide, 9 inches apart, with 6-inch brush stroke with a color that contrast the roof top, top of numbers/letters should point north.
2. The applicant shall install dedicated lights in the parking lot that are properly maintained including the drive access.
3. The applicant shall install an indoor and outdoor recording security camera system that shall be maintained by the property owner and accessible to LPD with camera views covering all ingress and egress to all building(s) and parking areas. The quantity and location shall be reviewed and approved by LPD prior to issuance of an occupancy permit.
4. Where access to the development is restricted because of secured openings or where immediate access is necessary for life-saving or emergency purposes, a key "knox" box is required to be installed in an approved location. The key "knox" box shall be of an approved type and shall contain keys to gain necessary access as required by the police chief. In addition to key "knox" box(es), any automatic gates shall have Opticom access ability to provide necessary access for emergency vehicles.
5. The proposed landscaping for this project shall conform to the following CPTED measurements:
   a. Maintain natural visible surveillance to building from parking lot and street.
   b. Plants taller than 8 feet shall be trimmed up to 4 feet from ground.
   c. Plans under 8 feet shall be trimmed to allow ground level surveillance.

ADMINISTRATIVE SERVICES

1. By exercising this approval, the applicant hereby agrees to indemnify, hold harmless and defend the City, its officers, agents, elected and appointed officials, and employees, from any and all liability or claims that may be brought against the City arising out of its approval of this Site Plan Review and Conditional Use Permit to the fullest extent permitted by law.

SAN JOAQUIN COUNTY ENVIRONMENTAL HEALTH DEPARTMENT

See attached memorandum dated June 21, 2023.

SAN JOAQUIN
COUNTY

Environmental Health Department
Jasjit Kang, REHS, Director
Muniappa Naidu, REHS, Assistant Director
PROGRAM COORDINATORS
Jeff Carruesco, REHS, RDI
Willy Ng, REHS
Steven Shih, REHS
Elena Manzo, REHS
Natalia Subbotnikova, REHS

June 21, 2023

To: City of Lathrop Community Development Department Planning Division
Attention David Niskanen

From: Cesar Ruvalcaba (209) 953-6213
Lead Senior Registered Environmental Health Specialist

CK

RE: **CUP-23-08, SPR-23-09, Referral, SU0015642, SU0015641**
14101 S. Manthey Road (APN: 192-020-14)

The San Joaquin County Environmental Health Department (EHD) recommends the following conditions as a part of developing this project:

1. Any geotechnical drilling shall be conducted under permit and inspection by The Environmental Health Department (San Joaquin County Development Title, Section 9-601.010(b) and 9-601.020(i)).

2. Any abandoned wells or septic systems shall be destroyed under permit and inspection by the EHD (San Joaquin County Development Title, Section 9-605.010 & 9-601.020)

ENVIRONMENTAL CHECKLIST
SUMMARY OF PROJECT REQUIREMENTS

Summary of CEQA Project Requirements for the Ashley Warehouse Project

Requirement AG-1: *Implement Lathrop Municipal Code Chapter 3.40 AGRICULTURAL MITIGATION FEE Section 3.40.030 Collection of Agricultural Mitigation Fee.*

The Agricultural Mitigation Fee enacted pursuant to this chapter is to be collected by the city before the issuance of building permits, or at approval of any discretionary permit if no building permit is required. (Ord. 05-248 § 1)

Requirement AG-2: *Require all development to coordinate with and participate with SJCOG in the SJMSCP Agricultural Mitigation Fee program as required.*

Requirement AQ-1: *Comply with SJVAPCD Rule 9510 Indirect Source Review*

Requirement AQ-2: *Comply with SSJVAPCD Regulation VIII for all sites and implementation control measures indicated in Tables 6-2 and 6-3 of the SJVAPCD's Guide for Assessing and Mitigating Air Quality Impacts.*

Requirement BIO-1: *Compliance with the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP)*

Requirement BIO-2: *Compliance with the mitigation recommendations included within Biological Resources Analysis Report (Attachment A).*

- VELB Buffer and/or Survey – VELB is a species covered by the SJMSCP (SJCOG 2000), and the incidental take minimization and mitigation measures outlined in the document are as follows:

  "In areas with elderberry bushes, as indicated by the SJMSCP Vegetation Maps or per a preconstruction survey identification or other sources indicated in Section 5.2.2.3, the following shall occur:

A. If elderberry shrubs are present on the project site, a setback of 20 feet from the dripline of each elderberry bush shall be established.

B. Brightly colored flags or fencing shall be placed surrounding elderberry shrubs throughout the construction process.

C. For all shrubs without evidence of VELB exit holes which cannot be retained on the project site as described in A and B, above, the JPA shall, during preconstruction surveys, count all stems of 1" or greater in diameter at ground level. Compensation for removal of these stems shall be provided by the JPA within SJMSCP Preserves as provided in SJMSCP Section 5.5.4(B).

D. For all shrubs with evidence of VELB exit holes, the JPA shall undertake transplanting of elderberry shrubs displaying evidence of VELB occupation to VELB mitigation sites during the dormant period for elderberry shrubs (November 1 - February 15). For elderberry shrubs displaying evidence of VELB occupation which cannot be transplanted, compensation for removal of shrubs shall be as provided in SJMSCP Section 5.5.4 (C)."

If the elderberry shrub can be maintained on the project site, then a 20 ft. setback will need to be established around the shrub (See Figure 11). If the shrub cannot be maintained on the project site, then VELB exit hole surveys consistent with the USFWS protocol (USFWS 2017) will be performed prior to any ground disturbance. Depending on the results of this survey, either mitigation measure C or D above will be used.

- Pre-construction Reptile Survey – Both California glossy snake and San Joaquin coachwhip have a low potential to occur on the Property and therefor a pre-construction survey should be performed no more than 48 hours prior to ground disturbance or vegetation removal. Surveys would be required to determine presence/absence of this species. If the species are found to occur on the project site, then passive relocation methods should be attempted before ground disturbance.
- Pre-Construction Avian Survey – If project construction-related activities would take place during the nesting season (February through August), preconstruction surveys for nesting passerine birds and raptors (birds of prey) in large trees adjacent to the project site should be conducted by a competent biologist 14 days prior to the commencement of the tree removal or site grading activities. Specific attention should be paid to the active Swainson's hawk nest that was identified across Dos Reis Road from the project site. As per the Incidental Take Minimization Measures for Swainson's hawk that are outlined in Section 5.2.4.11 of the SJMSCP (SJCOG 2000):

  "If a nest tree becomes occupied during construction activities, then all construction activities shall remain a distance of two times the dripline of the tree, measured from the nest."

  The dripline for the tree where the Swainson's hawk nest was observed is estimated to be 25 feet, making the required buffer for this nest 50 feet. The nest location and buffer are shown in Figure 11.

  If any other birds listed under the Migratory Bird Treaty Act are found to be nesting within the project site or within the area of influence, an adequate protective buffer zone should be established by a qualified biologist to protect the nesting site. This buffer shall be a minimum of 50 feet from the project activities for passerine birds, and a minimum of 250 feet for other raptors. The distance shall be determined by a competent biologist based on the site conditions (topography, if the nest is in a line of sight of the construction and the sensitivity of the birds nesting). The nest site(s) shall be monitored by a competent biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. Once the young have fledged and are flying well enough to avoid project construction zones (typically by August), the project can proceed without further regard to the nest site(s).
- Burrowing Owl Surveys – Burrowing owls were not identified on the project site during May 2021 survey. However, a burrowing owl pre-construction survey should take place before any construction activities commence. It is recommended that they be conducted whenever burrowing owl habitat or sign is encountered on or adjacent to (within 150 meters) a project site. Occupancy of burrowing owl habitat is confirmed at a site when at least one burrowing owl or its sign at or near a burrow entrance is observed within the last three years. If a burrowing owl or sign is present on the project site three additional protocol level surveys will be initiated. As per the incidental take minimization and mitigation measures outlined in the SJMSCO (SJCOG 2000): If burrowing owls are identified and work is to commence during the non-breeding season (September 1 through January 31), then the owls should be evicted from the project site by passive relocation as described in the CDFW's report on burrowing owls (1995). If work occurs during the breeding season (February 1 through August 31) then the burrows shall not be disturbed and will be provided with a 75-meter protective buffer. However, if it is determined that the birds have not begun laying eggs, or the juveniles from the occupied burrows are foraging independently and are capable of independent survival, then the burrows can be destroyed.

- Erosion Control – Grading and excavation activities could expose soil to increased rates of erosion during construction periods. During construction, runoff from the warehouse site could adversely surrounding habitats and cause increased particulate matter to enter the storm drain system. Implementation of appropriate mitigation measures would ensure that impacts to aquatic systems would be avoided or minimized. Mitigation measures may include best management practices (BMP's) such as hay bales, silt fencing, placement of straw mulch and hydro seeding of exposed soils after construction as identified in the Storm Water Pollution Prevention Plan (SWPPP).

Requirement CUL-1: *Implement General Plan Action: RR 3b*

RR-3b: Require all new development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains:

A. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Director shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Director; and

B. If human remains are discovered during any ground disturbing activity, work shall stop until the Community Development Director and the San Joaquin County Coroner have been contacted. If the human remains are determined to be of Native American origin, the Native American Heritage Commission and the most likely descendants shall be consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Director.

Requirement GEO-1: *Implement recommendations presented in the Preliminary Geotechnical Engineering Report. Prepared by: Terracon Consultants, Inc. during the project design and construction.*

Requirement HAZ-1: *If the project will store, transport or handle hazardous materials the project shall be required to prepare and file a Hazardous Materials Business Plan (HMBP) with the City prior to issuance of Certificate of Occupancy.*

Project Requirement Hydro-1*: The project applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that includes specific types and sources of stormwater pollutants, determine the location and nature of potential impacts, and specify appropriate control measures to eliminate impacts on receiving water quality from stormwater runoff. The SWPPP shall require treatment BMPs that incorporate, at a minimum, the required hydraulic sizing design criteria for volume and flow to treat projected stormwater runoff. The SWPPP shall comply with the most current standards established by the RWQCB, and the Lathrop Storm Water Program. Best Management Practices shall be subject to approval by the City Engineer and RWQCB.*

Project Requirement Hydro 2: *Prior to approval of the building permit, the project applicant shall submit a detailed Stormwater Control Plan constant with General Plan Action PFS-4.5, and the criteria set forth in the Lathrop Stormwater Program.*

Requirement N-1: *Implement General Plan Policy N-1.15, and Lathrop Municipal Code Section 8.20.110 (Construction of buildings and projects).*

N-1.15 Construction Noise. Require construction activities to reduce noise impacts on adjacent uses to the criteria identified in Table N-3, or, if the criteria cannot be met, to the maximum extent feasible complying with Title 15 of the LMC (Building and Construction) and use best practices. Construction activities outside of the permitted construction hours identified in the LMC may be approved on a case-by-case basis by the Building Official.

Lathrop Municipal Code Section 8.20.110 (Construction of buildings and projects) "It shall be unlawful for any person within a residential zone or within a radius of five hundred (500) feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures or projects or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device between the hours of ten p.m. of one day and seven a.m. of the next day, or eleven p.m. and nine a.m. Fridays, Saturdays and legal holidays, in such a manner that a reasonable person of normal sensitiveness residing in the area is caused discomfort or annoyance unless beforehand a permit therefore has been duly obtained from the office or body of the city having the function to issue permits of this kind. No permit shall be required to perform emergency work as defined in Sections 8.20.010 through 8.20.040. (Prior code § 99.40)"

ACKNOWLEDGEMENT OF TERMS AND CONDITIONS

I have read, understand and acknowledge the Conditions of Approval dated 9/13/2023 for the Ashley Furniture Project.

Signature of Applicant(s)

Aaron Hodgdon

Print Applicant(s) Name

9/6/2023

Date

ATTACHMENT "4"

PLANNING DIVISION
Vicinity Map

CUP-23-08, and SPR-23-09
Conditional Use Permit and Site Plan Review
Ashley Furniture Project
14101 S. Manthey Road
APN: 192-020-14

N
(Not to Scale)

ATTACHMENT " 5 "

Ashley Furniture

PROJECT SPECIFIC SITE PLAN REVIEW APPROVAL

Case No. SPR-23-09

Development Team

Applicant	Hodgdon Management and Construction, Inc. 1461 E Cooley Dr, Ste 230 Colton, CA 92324
Developer	Hodgdon Management and Construction, Inc. 1461 E Cooley Dr, Ste 230 Colton, CA 92324
Architect	HPA Architects 18831 Bardeen Ave Irvine, CA 92612
Civil Engineer/Landscape	MacKay & Somps 5142 Franklin Dr, STE B Pleasanton, CA 94588
Traffic Engineer	TJKM 4305 Hacienda Dr, STE 550 Pleasanton, CA 94588
Acoustical Consultant – Noise Assessment	Saxelby Acoustics 915 Highland Pointe Drive, STE 250 Roseville, CA 95678
CEQA Consultant and Air Toxics Health Risk Assessment	De Novo Planning 1020 Suncast Ln, #106 El Dorado Hills, CA 95762

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ASHLEY FURNITURE
Project Specific Site Plan Review Approval Narrative

A. Request and Property Description

The applicant is requesting a conditional use permit for the development of a new integrated, high-quality warehouse/light industrial/retail office development on approximately 89.5-acre property located at the northwest corner of Dos Reis Rd and Manthey Road (the "Property"). The proposed development will support the expansion needs of an international company specializing in uses that include light-industrial, warehouse and distribution, office, and retail sales of targeted bulk consumer goods.

The 2022 Lathrop General Plan Update designates the Property within an industrial area in the Central Lathrop Phase II area. The City of Lathrop is currently processing the Central Lathrop Specific Plan Phase II amendment and rezoning to implement the new General Plan Update designation for this area. The Property was formerly agricultural but now currently fallow. The Property is bound by fallow agricultural land directly to the north and De Lima Rd & Manthey Rd and Interstate 5 freeway to the east. The Property's western boundary is vacant, fallow agricultural land and the south boundary is Dos Reis Rd adjacent to vacant commercially zoned land and mixed vacant land and commercial/residential.

B. Project Description

The proposed development includes an approximately 1,486,607 square foot single or multi-tenant building with a mix of retail, office/call center, and warehouse and distribution uses (the "Project").

The Project is anticipated to be an attractive, high-quality development that will provide substantial employment opportunities within the City of Lathrop, including up to 500 diverse jobs at full operation.

The Project consists of a single building, with a mix of tenant-related uses. The primary mix of uses within the Project building include an up to 100,000 square foot retail showroom, a 24,000 square foot, 2-3 story office space consisting of call center and a regional office for up to 50 people. Warehouse and distribution uses will comprise the balance of the 1,352,347 square feet. The proposed building's height is approximately 50 feet, with architectural features that may extend to approximately 60 feet.

Vehicular & Truck access to the Property is proposed via four (4) access drives; one (1) access drive on Manthey Rd at the far northeast corner is dedicated for truck ingress/egress onto and from the Project. One (1) public and employee vehicular access mid-block on Manthey Rd is proposed for ingress/egress of the public and employees' access to the retail and office. Two (2) additional access points are proposed along Dos Reis Rd with the most eastern access proposed for public vehicular access to the retail and customer pick-up areas located at the southeast corner of the building. A fourth and final access is closed to the public and trucks and is reserved only for emergency vehicle access. Per the Traffic Impact Analysis completed by TJKM as a part of the Site Design Review package approval the project is expected to generate 680 daily truck trips including 95 a.m. peak hour trips and 45 p.m. peak hour trips.

The developer will widen Dos Reis Road and Manthey Road to their ultimate condition and compliant with the Central Lathrop Specific Plan Phase 2 Amendment (CLSP 2). Landscape and sidewalk improvements beyond the back of curb along the southern portion of Dos Reis Road will be constructed by future developers of the adjacent properties.

Per the Traffic Impact Analysis completed by TJKM as a part of the Site Design Review package approval the project is expected to generate 680 daily truck trips including 95 a.m. peak hour trips and 45 p.m. peak hour trips.

Once customers are on site, internal circulation roads will route them to the retail entrance in the center of the building. For furniture pick up, customers are directed to a separate waiting area labeled on the plan as "Customer Pick-up", ("CPU") located on the southeast corner of the building where customers will be guided to the CPU office and their pickup location.

Hours of operation will vary among the distribution, call center, and retail portions of the development. Retail hours are anticipated to align with the typical store hours of other Ashley Furniture locations in the Bay Area, running from 9:00 am to 9:00 pm 7 days a week. However, these hours are subject to change with final design.

The call and distribution centers are expected to have a broader range of operating hours, accommodating several shift changes throughout the day to ensure efficient operations. The specific number of shifts and their timeframes will be determined during the final design phase, considering operational requirements and workforce needs.

During final design, more detailed information regarding the hours of operations, the number of shifts, days of operation and the specific timeframes of shifts will be provided.

C. Permitted Uses

I. Permitted land uses for the Project include:

1. Call center
2. General retail sales
3. Office
4. Outdoor trailer parking
5. Outdoor storage associated with an on-site primary use, excluding vehicles

6. Sale of products including those assembled on-site as well as imported product
7. Retail showroom
8. Warehousing and Distribution

D. Site Details

I. Lighting

Light levels are not to exceed 1-foot candle at the property line. All proposed site lighting will comply with city zoning requirements.

II. Screening

The project proposes a 30-foot landscape buffer along the Dos Reis Road project frontage, in accordance with the Central Lathrop Specific Plan Phase 2 Amendment (CLSP 2). To further enhance screening for trailer parking areas, an 8-foot-tall community wall is proposed along the right-of-way of Dos Reis Road at the project frontage. Additionally, the project proposes an increased number of deciduous trees between the 8-foot paved sidewalk and the 8-foot-tall community wall. This condition will extend along the south boundary of the property until the first driveway east of the proposed Dos Reis Road and Golden Valley Parkway roundabout. Proceeding north along Manthey Road, the tree spacing, and landscape design will transition to a less dense arrangement typically found in retail areas.

III. Air Quality Best Management Practices

The project demonstrates compliance with the City of Lathrop General Plan Best Management Practices, as outlined in Implementation Action LU-5. d. The following measures have been implemented to align with these practices:

- The 30-foot landscape buffer described in section D.II provides a physical and structural buffer between possible sensitive receptors and the warehouse/trailer parking area.
- Sufficient onsite parking and queuing locations have been included in the project site plan, accommodating multiple truck lengths. This design ensures that trucks do not idle within public right-of-way.
- The project site plan is designed so that truck ingress/egress is largely isolated to the most Northeastern corner of the development along Manthey Road.
- Generous setbacks have been incorporated between loading docks and property lines.
- In areas where trailer parking is present, a community wall has been strategically placed along visible sections of right-of-way and property lines to screen views.

- Wayfinding signs have been specifically designed and positioned at truck ingress/egress locations, clearly indicating that truck traffic is restricted to Roth Road only.

IV. Walls & Fences

See Screen Wall & Fencing Plan; Sheet DAB-A4.2

V. Parking Standards

On-site parking for the Project shall be provided in accordance with Table 1 below:

Table 1

SITE AREA		
in s f	3 767 820	s f
in acres	86 50	ac
BUILDING AREA		
Office - 1st floor	8 000	s f
Office - 2nd floor	8,000	s f
Office - 3rd floor	8 000	s f
Retail - 1st floor	55 130	s f
Retail - 2nd floor	55 130	s f
Warehouse	1 352 347	s f
TOTAL	1 486 607	s f
AUTO PARKING REQUIRED		
Office 1/400 s f	60	stalls
Retail 1/600 s f	184	stalls
Whse 1/2 000 s f	676	stalls
TOTAL	920	stalls
AUTO PARKING PROVIDED		
Standard (9' x 20')	942	stalls
TOTAL	942	stalls
Required Accessible Parking for Disabled		
Standard Accessible (9' x 20')	16	stalls
Van Accessible (12' x 20')	4	stalls
Total	20	stalls
Required EV parking		
EV Capable Space (9' x 20')	144	stalls
EVCS Standard (9' x 20')	49	stalls
Total EV Capable Space	188	stalls
ADA EV Parking (CBC Table 11B-228 3 2 1)		
EVCS Van Accessible (12' x 20')	1	stalls
EVCS Standard Accessible (9' x 20')	5	stalls
EVCS Ambulatory (10' x 20')	5	stalls
Total ADA EV	11	stalls
Total - EV Capable Space	144	stalls
Total - EVCS Standard ( ) ADA EVCS	38	stalls
Total - ADA EVSC	11	stalls
Total	193	stalls
Provided Parking Breakdown		
Standard (9' x 20')	722	stalls
Standard Accessible (9' x 20')	19	stalls
Van Accessible (12' x 20')	6	stalls
EV Capable Space (9' x 20)	145	stalls
EVCS Standard (9' x 20')	38	stalls
EVCS Van Accessible (12' x 20')	2	stalls
EVCS Standard Accessible (9' x 20')	5	stalls
EVCS Ambulatory (10' x 20')	5	stalls
Total	942	stalls
TRAILER PARKING PROVIDED		
Trailer (12' x 30')	46	stalls
Trailer (12' x 40')	261	stalls
Trailer (12' x 53')	797	stalls
TOTAL	1,104	stalls

E. Architectural Design

The architectural character of the development will have a high-tech contemporary appearance. This will be established using clean edges and forms, and colors. The development's east elevation, facing Manthey Rd & Interstate 5, will convey a high-quality office/retail appearance while maintaining key functions, including customer pick-up areas along the southeast elevation. This is achieved with glazing to indicate an office appearance and clerestory windows along the upper portions of the façade. Please refer to the conceptual building elevations on Sheet DAB-A3.3.

The conceptual building elevations include strong architectural forms and distinct design elements, such as accent shading features, variations in parapet height and colors. Collectively these provide for enhanced visual interest and varied building massing, to create distinctive points of entry for users. A combination of concrete tilt up wall panels with a series of reveals and patterns in the tilts will accent the building elevations. Curtain wall glazing systems at each entry location will highlight the material variation, with portions that reach a high elevation to accommodate two to three-story office/retail within the building. These various treatments will be incorporated into the project design to provide variation and texture to the building façade.

F. Site Design Criteria

The conceptual site plan orients the Project to Manthey Rd. Public access to the Property will be provided via Manthey and Dos Reis Roads in the locations shown on the site plan. These points of access and internal circulation provide good access to users, employees, and customers. Generous landscaping along Dos Reis effectively screens the south elevation from Dos Reis Rd, while dense and tasteful landscape accents the east elevation and the retail portion of the project.

Dedicated truck access located at the very northeast corner of the property is the only access point for ingress and egress of truck traffic. Trucks are restricted from going south of this access point and will come from and to the north towards Roth Rd interchange only.

The conceptual site plan identifies approximately 2,046 parking spaces provided throughout the development. Parking for trucks and employees is provided behind secured, gated access points as depicted on the conceptual site plan. Approximately 1,104 trailer parking spaces are provided behind secured, gated access points.

G. Landscaping

Project landscaping will be consistent with the Site Plan Review package's landscape plan and area renderings included for conceptual design. The landscape design along rights-of-way and parking areas will be consistent with the Central Lathrop Specific Plan 2 Amendment (CLSP 2) and city zoning requirements for retail. The landscape design in stormwater quality areas will be compliant with the Multi-Agency Post-Construction Stormwater Standards Manual.

Vehicular entries and street frontages will provide a formal entry design sequence, including the use of "offset" of trees along with formal masses of shrubs and groundcovers. The project will match the City of Lathrop's retail design criteria for retail along Manthey Rd. The city's criteria identify London Plane Tree and Chinese Flame trees as primary and secondary trees. A more diverse plant palette will be used. Additional street trees along the Dos Reis Rd frontage include Deodar Cedar, and Chinese Flame trees. Massed shrubs will further screen perimeter screen walls around the Project perimeter and colorful accent shrubs and groundcover plantings will be used around all signage.

The landscape design in proximity to the building will complement the building's high-tech contemporary appearance, as well as the size. Trees and shrubs will provide pedestrian shade and visual interest and will contrast the architectural pop-outs to provide human scale at the entries. Pedestrian walks that connect the Project and parking lots to storefront entries will be appropriately shaded.

H. Employee Amenities

Employee outdoor break areas with shading and benches/seating have been incorporated into the site plan to allow employees an outdoor space to enjoy break periods. Employee break areas are compliant with the Design Guidelines (Chapter 7) section of the Central Lathrop Specific Plan 2 Amendment (CLSP 2).

I. Grading and Drainage

The grading and drainage plan for the Property will comply with the City of Lathrop's drainage design standards and the Multi-Agency Post-Construction Stormwater Standards Manual. Storm drainage will be conveyed via internalized roof drains and downspouts, as well as overland flow across the parking lots and truck dock areas. This flow will be directed to curb openings at stormwater quality treatment areas distributed throughout the site. These treatment areas will effectively treat stormwater before it is discharged into the site's storm drain system. Ultimately the onsite storm drain system connects to the existing Watershed 4 storm drain line in Dos Reis Road where that storm water continues west to the existing storm drain pump station at Stanford Crossing and Spartan Way. The stormwater quality treatment areas and the underground storm drainpipe system have been sized to together accommodate a 100-year storm event.

J. Utilities and Infrastructure

The City of Lathrop will provide water to the Property via a 12-inch public waterline within Golden Valley Parkway. The project proposes new 12-inch public water lines in Manthey Road and Dos Reis Road.

The City of Lathrop will provide storm sewer and wastewater treatment service. There is an existing sewer main within Golden Valley Parkway. It is anticipated that existing sewer main is to provide a gravity sewer connection to the Property.

K. Project Schedule

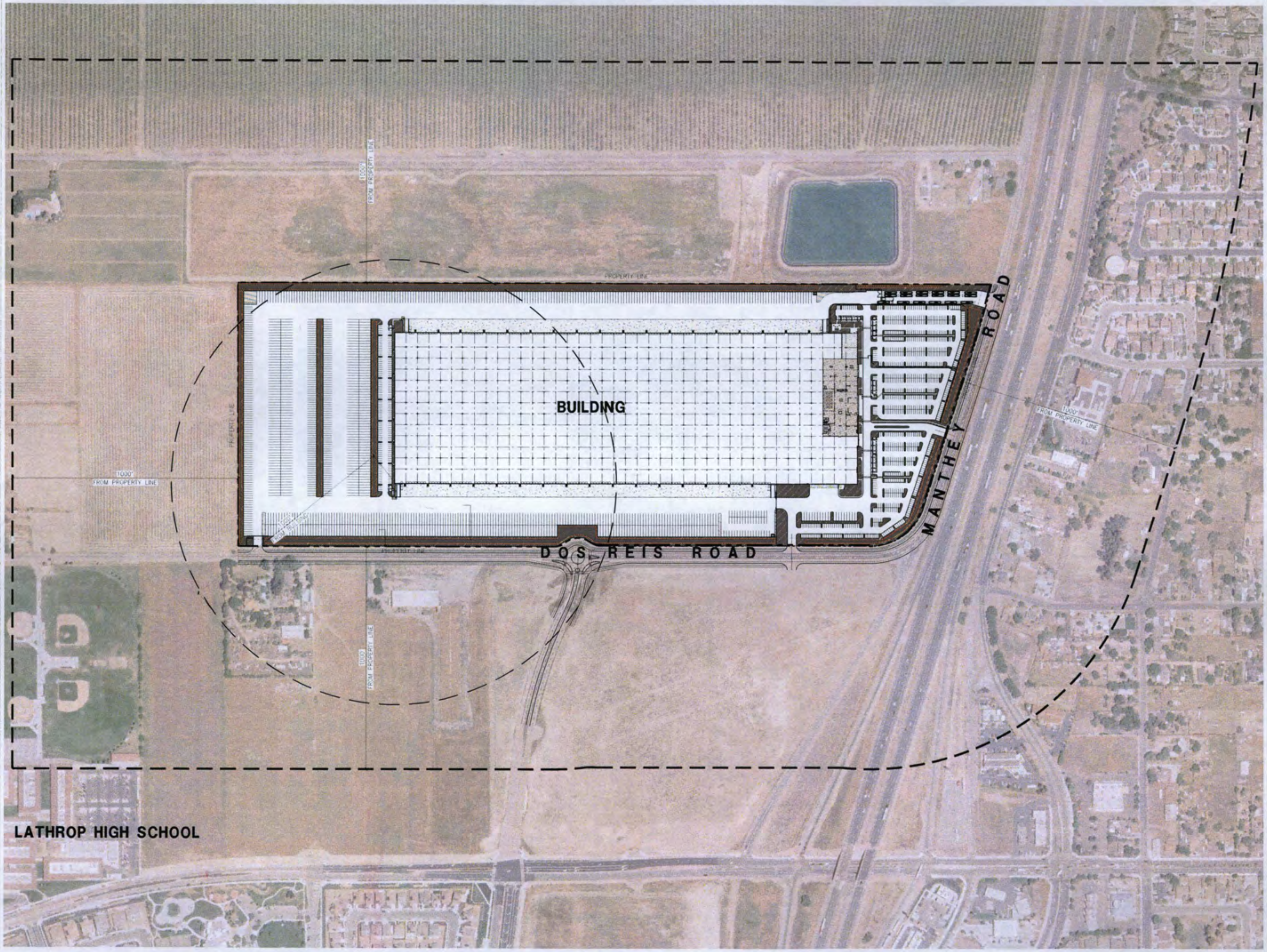
The design phase of the project is expected to begin immediately after the public approval of the Central Lathrop Specific Plan 2 Amendment, Site Plan Review Package, and Conditional Use Permit. Assuming an Improvement/Grading Plan approval in the first half of 2024 construction is expected to commence in the second half of 2024.

L. Summary

The proposed development will provide benefits to the City of Lathrop by adding a diversity of up to 500 new jobs at full operation involving a significant capital investment more than $100 million, and anticipated retail sales exceeding $30 million annually and will activate an undeveloped, long-term vacant parcel of land with a quality use that will provide considerable sales tax revenues and other economic benefits to the City of Lathrop.

This Project implements the General Plan, Central Lathrop Specific Plan Phase 2 Amendment (CLSP 2), zoning, and Design Guidelines that encourage site development and architectural design that will be integrated with the surrounding mixed use residential development. The project's frontage improvement of Dos Reis Road and Manthey Road into their ultimate condition including the landscape buffer previously mentioned along Dos Reis Road will positively influence the area. In summary, this proposal is consistent with the City's long-term vision for this area, it is compatible with the surrounding area.

ATTACHMENT " 6 "



1,000' RADIUS SITE MAP (A) N.T.S.

TRUE NORTH

HPA architecture

hpa, inc.
18831 bardeen avenue - ste. #100 irvine, ca 92612
tel: 949-863-1770
email: hpa@hparchs.com

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

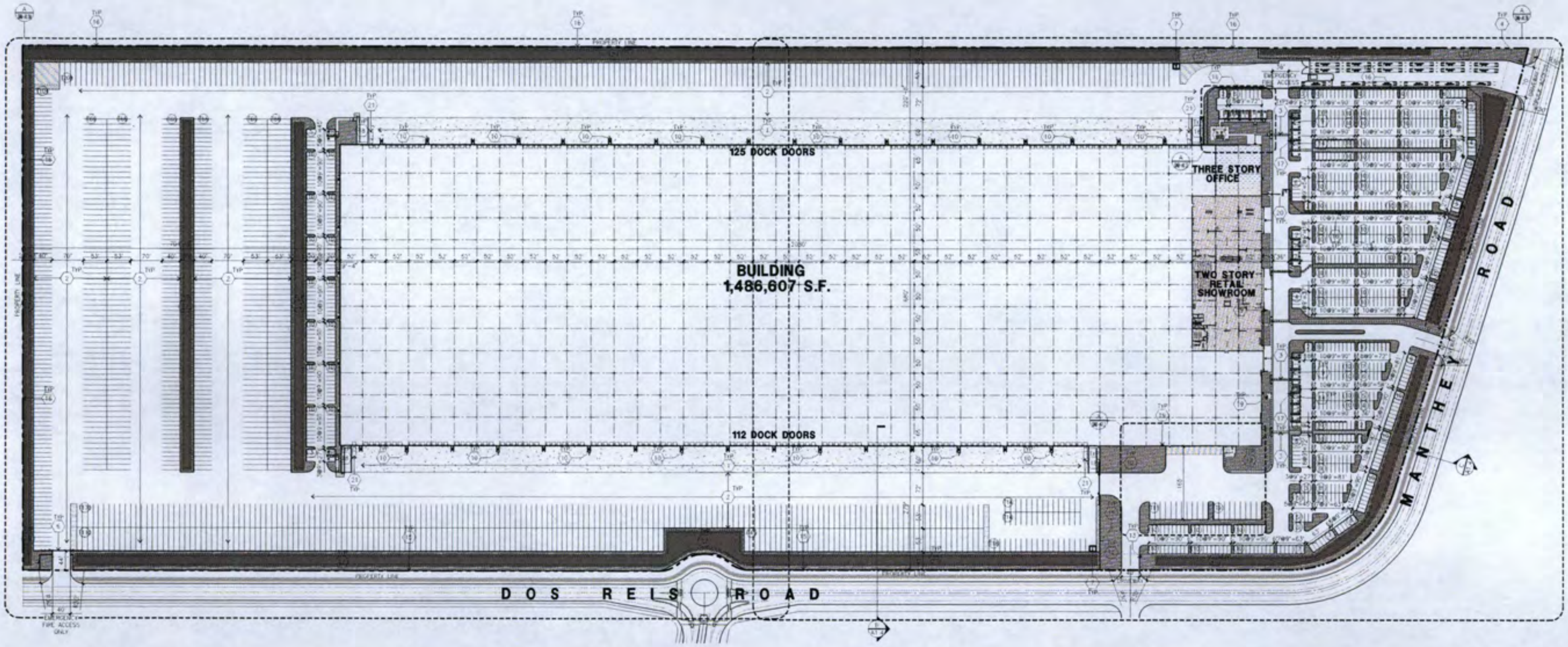
Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title: 1,000' RADIUS SITE MAP

Project Number:	21290
Drawn by:	CR
Date:	5/3/23
Revision:	

Sheet:
DAB-A1.0



OVERALL SITE PLAN (A)

SCALE: 1" = 100'-0"

0 100' 200' 300'

TRUE NORTH

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT.
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. TRUCK ENTRY SIGN. SEE DETAIL 15/DAB-A4.1
5. 5'-6"x5'-6"x4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH.
6. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY
7. TRASH ENCLOSURE PER CITY STANDARDS. SEE DAB-A4.1
8. APPROXIMATE LOCATION OF TRANSFORMER
9. PRE-CAST CONCRETE WHEEL STOP
10. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H.
11. LIGHT POLE
12. LANDSCAPE: ALL LANDSCAPE AREAS INDICATED BY SHADING
13. ACCESSIBLE ENTRY SIGN
14. ACCESSIBLE PARKING STALL SIGN
15. 8' HIGH TILT-UP SCREEN WALL
16. 8' HIGH METAL FENCE
17. TRUNCATED DOME
18. DRIVE THRU DOOR CONCRETE RAMP
19. BIKE RACK
20. EMPLOYEE ENTRANCE
21. TRASH COMPACTOR
22. DETENTION BASIN - SEE CIVIL PLANS
23. 3'X7' HOLLOW METAL EXTERIOR MAN DOOR
24. EMPLOYEE BREAK AREA

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY TBD
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLIANCE FOR LANDSCAPING IF REQUIRED BY CLARK COUNTY
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT
15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

SITE LEGEND

- CONCRETE PAVING
- ASPHALT CONCRETE PAVING
- STANDARD PARKING STALL (9'-0" x 20')
- ACCESSIBLE PARKING STALL (9' x 20') + 5' W/ ACCESSIBLE AISLE
- ACCESSIBLE PARKING (VAN) STALL (12' x 20') + 5' W/ ACCESSIBLE AISLE
- CLEAN AIR/VAN POOL/EV CONDUIT WITH FUTURE CHARGING INFRASTRUCTURE STALL (9' X 18')
- CLEAN AIR/VAN POOL/EV STALL (9' X 18')
- LANDSCAPED AREA
- PATH OF TRAVEL
- 26' FIRE WIDE FIRELANE

TABULATION

SITE AREA		
in s.f.	3,767,820	s.f.
in acres	86.50	ac
BUILDING AREA		
Office - 1st floor	8,000	s.f.
Office - 2nd floor	8,000	s.f.
Office - 3rd floor	8,000	s.f.
Retail - 1st floor	55,130	s.f.
Retail - 2nd floor	55,130	s.f.
Warehouse	1,352,347	s.f.
TOTAL	1,486,607	s.f.
AUTO PARKING REQUIRED		
Office: 1/400 s.f.	60	stalls
Retail: 1/600 s.f.	184	stalls
Whse: 1/2,000 s.f.	676	stalls
TOTAL	920	stalls
AUTO PARKING PROVIDED		
Standard (9' x 20')	942	stalls
TOTAL	942	stalls
Required Accessible Parking for Disabled		
Standard Accessible (9' x 20')	16	stalls
Van Accessible (12' x 20')	4	stalls
Total	20	stalls
Required EV parking		
EV Capable Space (9' x 20')	144	stalls
EVCS Standard (9' x 20')	49	stalls
Total EV Capable Space	193	stalls
ADA EV Parking (CBC Table 11B-228.3.2.1)		
EVCS Van Accessible (12' x 20')	1	stalls
EVCS Standard Accessible (9' x 20')	5	stalls
EVCS Ambulatory (10' x 20')	5	stalls
Total ADA EV	11	stalls
Total - EV Capable Space	144	stalls
Total - EVCS Standard (+ADA EVCS	38	stalls
Total - ADA EVSC	11	stalls
Total	193	stalls
Provided Parking Breakdown		
Standard (9' x 20')	727	stalls
Standard Accessible (9' x 20')	19	stalls
Van Accessible (12' x 20')	6	stalls
EV Capable Space (9' x 20')	145	stalls
EVCS Standard (9' x 20')	38	stalls
EVCS Van Accessible (12' x 20')	2	stalls
EVCS Standard Accessible (9' x 20')	5	stalls
EVCS Ambulatory (10' x 20')	5	stalls
Total	942	stalls
TRAILER PARKING PROVIDED		
Trailer (12' x 35')	46	stalls
Trailer (12' x 40')	261	stalls
Trailer (12' x 53')	797	stalls
TOTAL	1,104	stalls

2

ZONING ORDINANCE FOR CITY
Current Zoning Designation - Central Lathrop SP
- K-8-CL, Elementary School
- NP, Neighbourhood Park
- VR-CL, Variable Density Residential

Proposed Zoning Designation - Limited Industrial

MAXIMUM BUILDING HEIGHT ALLOWED
Max height - 75'

MAXIMUM FLOOR AREA RATIO
FAR - 1.0
Provided - 0.39

SETBACKS
Dos Reis Rd. - 30'
De Lima Rd. - 10'
Manthey Rd. - 30'

MAP

HPA

hpa, inc.
18831 bardeen avenue - ste. #100 irvine, ca 92612
tel: 949-863-1770
email: hpa@hparchs.com

LICENSED ARCHITECT
C-29481
3-31-25
STATE OF CALIFORNIA

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

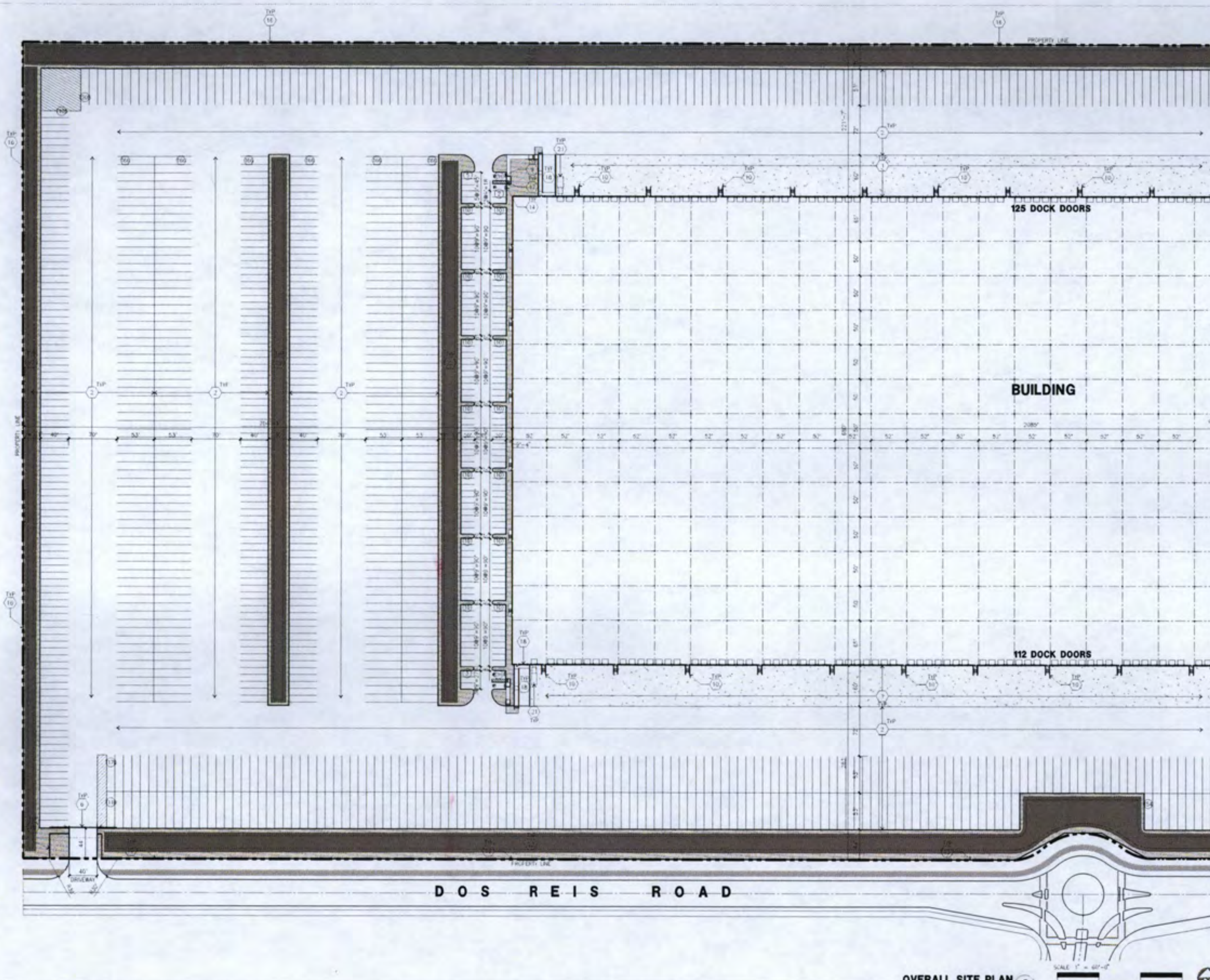
Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title:	OVERALL SITE PLAN
Project Number:	21290
Drawn by:	CR
Date:	5/3/23
Revision:	

Sheet:
DAB-A1.1



OVERALL SITE PLAN (A)

SCALE: 1" = 60'-0"

TRUE NORTH

MAP

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH.
4. TRUCK ENTRY SIGN. SEE DETAIL 15/DAB-A4.1
5. 5'-6"X5'-6"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH.
6. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY
7. TRASH ENCLOSURE PER CITY STANDARDS. SEE DAB-A4.1
8. APPROXIMATE LOCATION OF TRANSFORMER.
9. PRE-CAST CONCRETE WHEEL STOP
10. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H.
11. LIGHT POLE
12. LANDSCAPE. ALL LANDSCAPE AREAS INDICATED BY SHADING
13. ACCESSIBLE ENTRY SIGN
14. ACCESSIBLE PARKING STALL SIGN.
15. 8' HIGH TILT-UP SCREEN WALL
16. 8' HIGH METAL FENCE
17. TRUNCATED DOME.
18. DRIVE THRU DOOR CONCRETE RAMP
19. BIKE RACK.
20. EMPLOYEE ENTRANCE
21. TRASH COMPACTOR
22. DETENTION BASIN - SEE CIVIL PLANS
23. 3'X7' HOLLOW METAL EXTERIOR MAN DOOR
24. EMPLOYEE BREAK AREA.

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY: TBD
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS
9. SEE "C" DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLIANCE FOR LANDSCAPING IF REQUIRED BY CLARK COUNTY
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15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.

SITE LEGEND

- CONCRETE PAVING
- ASPHALT CONCRETE PAVING
- STANDARD PARKING STALL (9'-0" x 20')
- ACCESSIBLE PARKING STALL (9' X 20') + 5' W/ ACCESSIBLE AISLE
- ACCESSIBLE PARKING (VAN) STALL (12' X 20') + 5' W/ ACCESSIBLE AISLE
- CLEAN AIR/VAN POOL/EV CONDUIT WITH FUTURE CHARGING INFRASTRUCTURE STALL (9' X 18')
- CLEAN AIR/VAN POOL/EV STALL (9' X 18')
- LANDSCAPED AREA
- PATH OF TRAVEL
- 26' FIRE WIDE FIRELANE

TABULATION

SITE AREA		
in s.f.	3,797,103 [illegible]	s.f.
in acres	85.50 [illegible]	ac
BUILDING AREA		
Office - 1st floor	8,000	s.f.
Office - 2nd floor	4,000	s.f.
Office - 3rd floor	[illegible]	s.f.
Retail - 1st floor	[illegible]	s.f.
Retail - 2nd floor	[illegible]	s.f.
Warehouse	[illegible]	s.f.
TOTAL	[illegible]	s.f.
AUTO PARKING REQUIRED		
Office [illegible]	[illegible]	stalls
Retail [illegible]	[illegible]	stalls
Whse [illegible]	[illegible]	stalls
TOTAL	[illegible]	stalls
AUTO PARKING PROVIDED		
Standard (9' x 20')	[illegible]	stalls
TOTAL	[illegible]	stalls
Required Accessible Parking for Disabled		
Standard Accessible (9' x 20')	[illegible]	stalls
Van Accessible (12' x 20')	4	stalls
Total	[illegible]	stalls
Required EV parking		
EV Capable Space (9' x 20')	[illegible]	stalls
EVCS Standard (9' x 20') [illegible]	[illegible]	stalls
Total EV Capable Space	[illegible]	stalls
ADA EV Parking [illegible]		
EVCS Van Accessible (12' x 20')	1	stalls
EVCS Standard Accessible (9' x 20')	[illegible]	stalls
EVCS Ambulatory (10' x 20')	[illegible]	stalls
Total ADA EV	[illegible]	stalls
Total - EV Capable Space	[illegible]	stalls
Total - EVCS Standard [illegible] ADA EVCS	[illegible]	stalls
Total - ADA EVCS	[illegible]	stalls
Total	[illegible]	stalls
Provided Parking Breakdown		
Standard (9' x 20')	[illegible]	stalls
Standard Accessible (9' x 20')	[illegible]	stalls
Van Accessible (12' x 20')	[illegible]	stalls
EV Capable Space (9' x 20')	[illegible]	stalls
EVCS Standard (9' x 20')	[illegible]	stalls
EVCS Van Accessible (12' x 20')	[illegible]	stalls
EVCS Standard Accessible (9' x 20')	[illegible]	stalls
EVCS Ambulatory (10' x 20')	[illegible]	stalls
Total	[illegible]	stalls
TRAILER PARKING PROVIDED		
Trailer (12' x 50')	[illegible]	stalls
Trailer (12' x 40')	[illegible]	stalls
Trailer (12 x 53')	[illegible]	stalls
TOTAL	1,1[illegible]	stalls

ZONING ORDINANCE FOR CITY
Current Zoning Designation - Central Lathrop SP
- K-8-CL Elementary School
- NP Neighborhood Park
- VR-CL Variable Density Residential
Proposed Zoning Designation - Limited Industrial
MAXIMUM BUILDING HEIGHT ALLOWED
Max height - [illegible]
MAXIMUM FLOOR AREA RATIO
FAR - 1.0
Proposed - [illegible]
SETBACKS
Dos Rios Rd - [illegible]
De Lima Rd - [illegible]
Manthey Rd - [illegible]

HPA architecture

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tel: 949-863-1770
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LICENSED ARCHITECT — STATE OF CALIFORNIA — C-25401 — 3-31-25 RENEWAL DATE

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

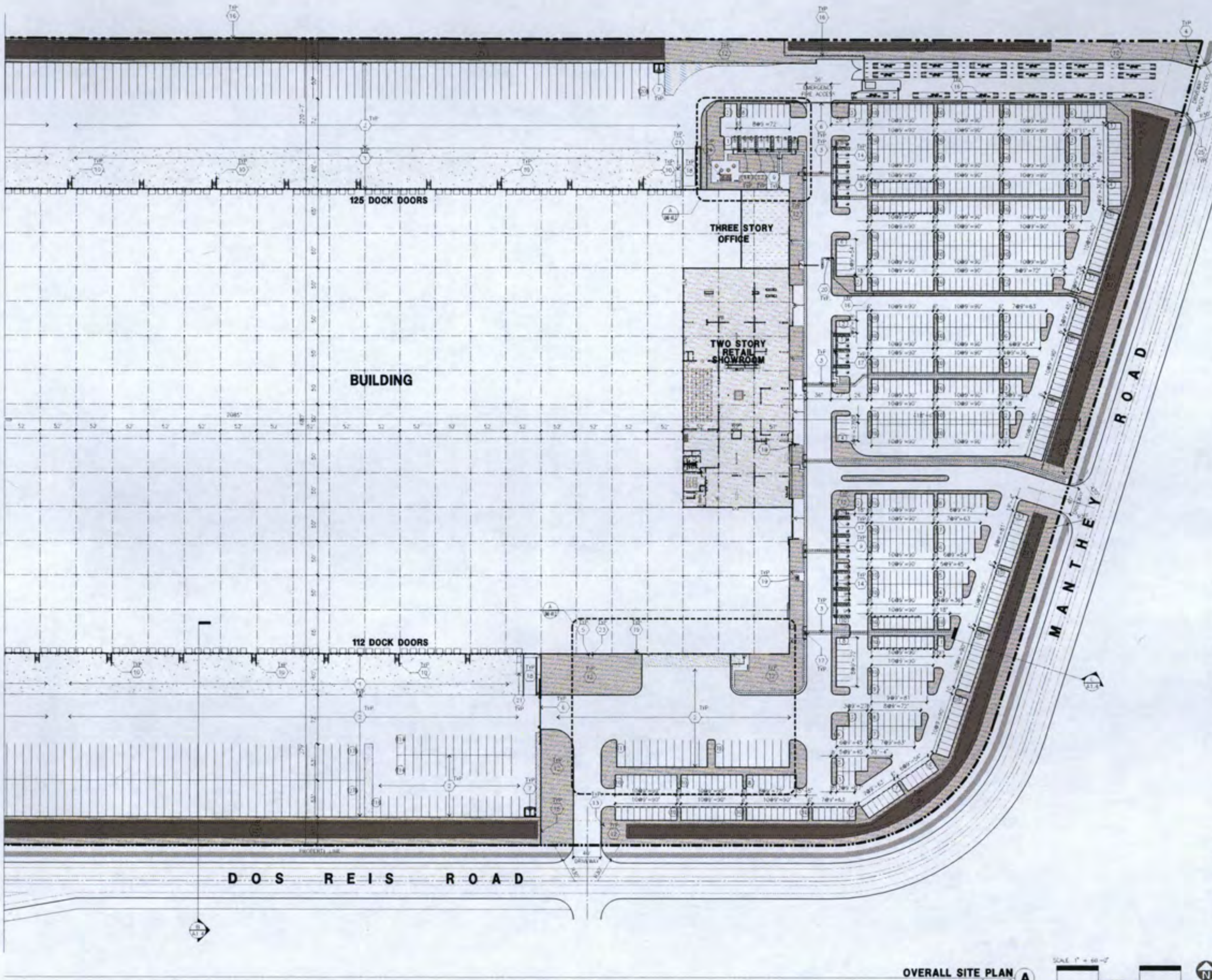
Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title: OVERALL SITE PLAN

Project Number: 21290
Drawn by: CR
Date: 5/3/23
Revision:

Sheet:
DAB-A1.1A



OVERALL SITE PLAN (A)
1" = 60'-0"

MAP

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT.
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH.
4. TRUCK ENTRY SIGN. SEE DETAIL 15/DAB-A4.1
5. 5'-6"X5'-6"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH.
6. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY
7. TRASH ENCLOSURE PER CITY STANDARDS. SEE DAB-A4.1
8. APPROXIMATE LOCATION OF TRANSFORMER
9. PRE-CAST CONCRETE WHEEL STOP
10. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H.
11. LIGHT POLE
12. LANDSCAPE. ALL LANDSCAPE AREAS INDICATED BY SHADING.
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15. 8' HIGH TILT-UP SCREEN WALL
16. 8' HIGH METAL FENCE
17. TRUNCATED DOME.
18. DRIVE THRU DOOR CONCRETE RAMP
19. BIKE RACK
20. EMPLOYEE ENTRANCE
21. TRASH COMPACTOR
22. DETENTION BASIN - SEE CIVIL PLANS
23. 3'X7' HOLLOW METAL EXTERIOR MAN DOOR
24. EMPLOYEE BREAK AREA
25. TRUCK EXIT SIGN. SEE DETAIL 16/DAB-A4.1

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY: TBD
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
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11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
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15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.

SITE LEGEND

- CONCRETE PAVING
- ASPHALT CONCRETE PAVING
- STANDARD PARKING STALL (9'-0" X 20')
- ACCESSIBLE PARKING STALL (9' X 20') + 5' W/ ACCESSIBLE AISLE
- ACCESSIBLE PARKING (VAN) STALL (12' X 20') + 5' W/ ACCESSIBLE AISLE
- CLEAN AIR/VAN POOL/EV CONDUIT WITH FUTURE CHARGING INFRASTRUCTURE STALL (9' X 18')
- CLEAN AIR/VAN POOL/EV STALL (9' X 18')
- LANDSCAPED AREA
- PATH OF TRAVEL
- 26' FIRE WIDE FIRELANE

TABULATION

SITE AREA		
In s.f.	[illegible]	s.f.
In acres	[illegible]	ac
BUILDING AREA		
Office - 1st floor	4,200	s.f.
Office - 2nd floor	4,200	s.f.
Office - 3rd floor	4,200	s.f.
Retail - 1st floor	[illegible]	s.f.
Retail - 2nd floor	[illegible]	s.f.
Warehouse	[illegible]	s.f.
TOTAL	[illegible]	s.f.
AUTO PARKING REQUIRED		
Office: [illegible]	[illegible]	stalls
Retail: [illegible]	[illegible]	stalls
Whse: [illegible]	[illegible]	stalls
TOTAL	[illegible]	stalls
AUTO PARKING PROVIDED		
Standard (9' x 20')	[illegible]	stalls
TOTAL	[illegible]	stalls
Required Accessible Parking for Disabled		
Standard Accessible (9' x 20')	[illegible]	stalls
Van Accessible (12' x 20')	[illegible]	stalls
Total	[illegible]	stalls
Required EV parking		
EV Capable Space (9' x 20')	[illegible]	stalls
EVCS Standard (9' x 20')	[illegible]	stalls
Total EV Capable Space	[illegible]	stalls
ADA EV Parking (CBC Table [illegible])		
EVCS Van Accessible (12' x 20')	[illegible]	stalls
EVCS Standard Accessible (9' x 20')	[illegible]	stalls
EVCS Ambulatory (10' x 20')	[illegible]	stalls
Total ADA EV	[illegible]	stalls
Total - EV Capable Space	[illegible]	stalls
Total - EVCS Standard (-) ADA EVCS	[illegible]	stalls
Total - ADA EVCS	[illegible]	stalls
Total	[illegible]	stalls
Provided Parking Breakdown		
Standard (9' x 20')	[illegible]	stalls
Standard Accessible (9' x 20')	[illegible]	stalls
Van Accessible (12' x 20')	[illegible]	stalls
EV Capable Space (9' x 20')	[illegible]	stalls
EVCS Standard (9' x 20')	[illegible]	stalls
EVCS Van Accessible (12' x 20')	[illegible]	stalls
EVCS Standard Accessible (9' x 20')	[illegible]	stalls
EVCS Ambulatory (10' x 20')	[illegible]	stalls
Total	[illegible]	stalls
TRAILER PARKING PROVIDED		
Trailer (12' x 30')	[illegible]	stalls
Trailer (12' x 40')	[illegible]	stalls
Trailer (12' x 53')	[illegible]	stalls
TOTAL	[illegible]	stalls

ZONING ORDINANCE FOR CITY
Current Zoning Designation - Central Lathrop SP
- [illegible] Elementary School
- NP Neighborhood Park
- VR-CL Variable Density Residential
Proposed Zoning Designation - Limited Industrial
MAXIMUM BUILDING HEIGHT ALLOWED
Max height - [illegible]
MAXIMUM FLOOR AREA RATIO
FAR - [illegible]
Provided - [illegible]
SETBACKS
Dos Rios Rd. - [illegible]
De Lima Rd. - [illegible]
Manthey Rd. - [illegible]

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LICENSED ARCHITECT STATE OF CALIFORNIA C-29451 3-31-25 RENEWAL DATE

OWNER
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hodgdon group
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Project:
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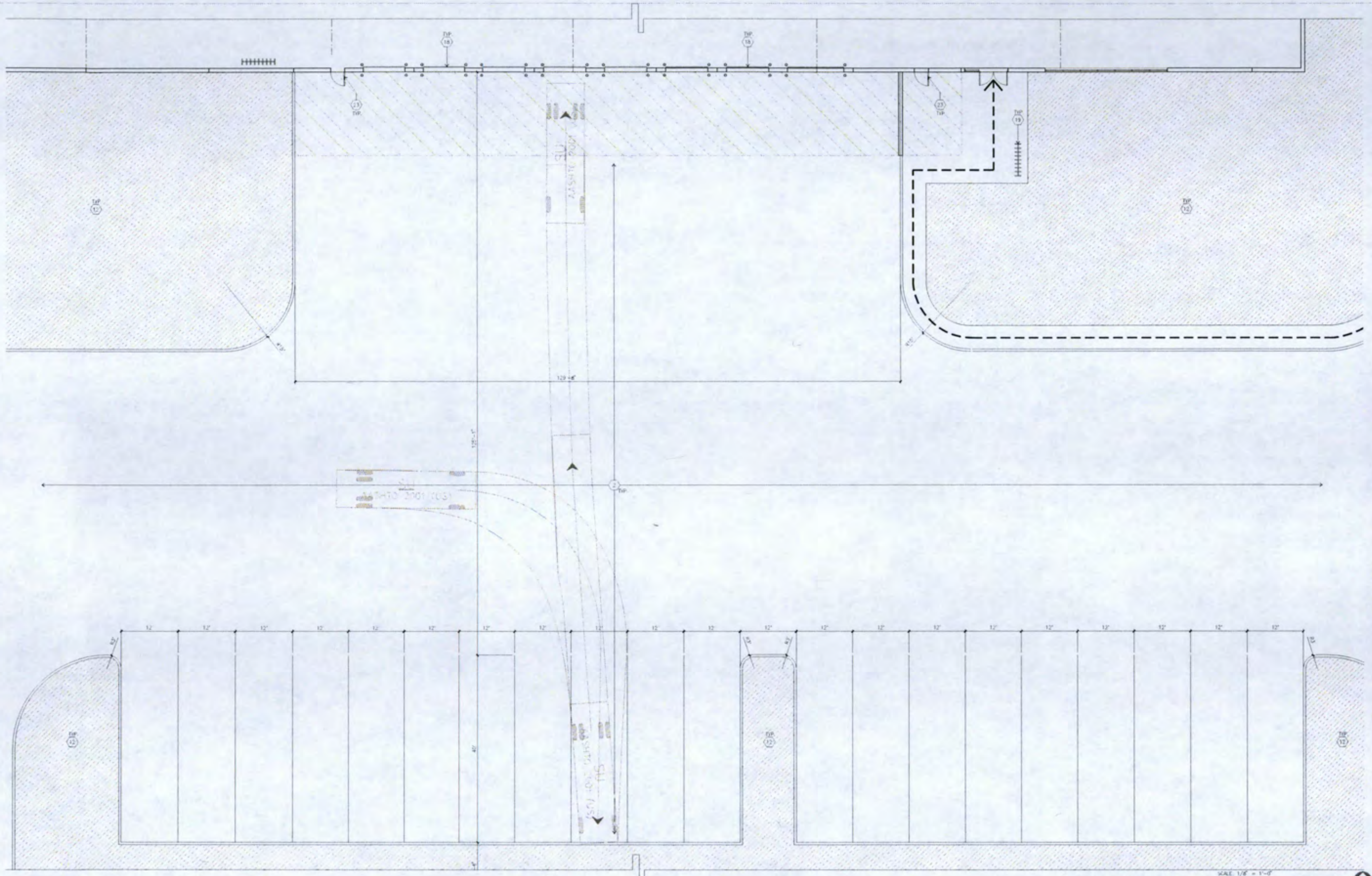
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title:	OVERALL SITE PLAN
Project Number:	21290
Drawn by:	CR
Date:	5/3/23
Revision:	
Sheet:	DAB-A1.1B



ENLARGED SITE PLAN (A)

scale: 1/8" = 1'-0"

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. TRUCK ENTRY SIGN. SEE DETAIL 15/DAB-A4.1
5. 5'-6"X5'-6"x4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH.
6. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. TRASH ENCLOSURE PER CITY STANDARDS. SEE DAB-A4.1
8. APPROXIMATE LOCATION OF TRANSFORMER.
9. PRE-CAST CONCRETE WHEEL STOP
10. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H
11. LIGHT POLE
12. LANDSCAPE. ALL LANDSCAPE AREAS INDICATED BY SHADING
13. ACCESSIBLE ENTRY SIGN
14. ACCESSIBLE PARKING STALL SIGN
15. 8' HIGH TILT-UP SCREEN WALL
16. 6' HIGH METAL FENCE
17. TRUNCATED DOME.
18. DRIVE THRU DOOR CONCRETE RAMP
19. BIKE RACK
20. EMPLOYEE ENTRANCE
21. TRASH COMPACTOR
22. DETENTION BASIN - SEE CIVIL PLANS
23. 3'X7' HOLLOW METAL EXTERIOR MAN DOOR
24. EMPLOYEE BREAK AREA

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY TBD
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4" FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS
13. PRIOR TO FINAL INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLIANCE FOR LANDSCAPING IF REQUIRED BY CLARK COUNTY
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT
15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

SITE LEGEND

- CONCRETE PAVING
- ASPHALT CONCRETE PAVING
- STANDARD PARKING STALL (9'-0" X 20')
- ACCESSIBLE PARKING STALL (9' X 20') + 5' W/ ACCESSIBLE AISLE
- ACCESSIBLE PARKING (VAN) STALL (12' X 20') + 5' W/ ACCESSIBLE AISLE
- CLEAN AIR/VAN POOL/EV CONDUIT WITH FUTURE
- LANDSCAPED AREA
- PATH OF TRAVEL
- 26' FIRE WIDE FIRELANE

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LICENSED ARCHITECT C-26451 3-31-25 RENEWAL DATE STATE OF CALIFORNIA

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

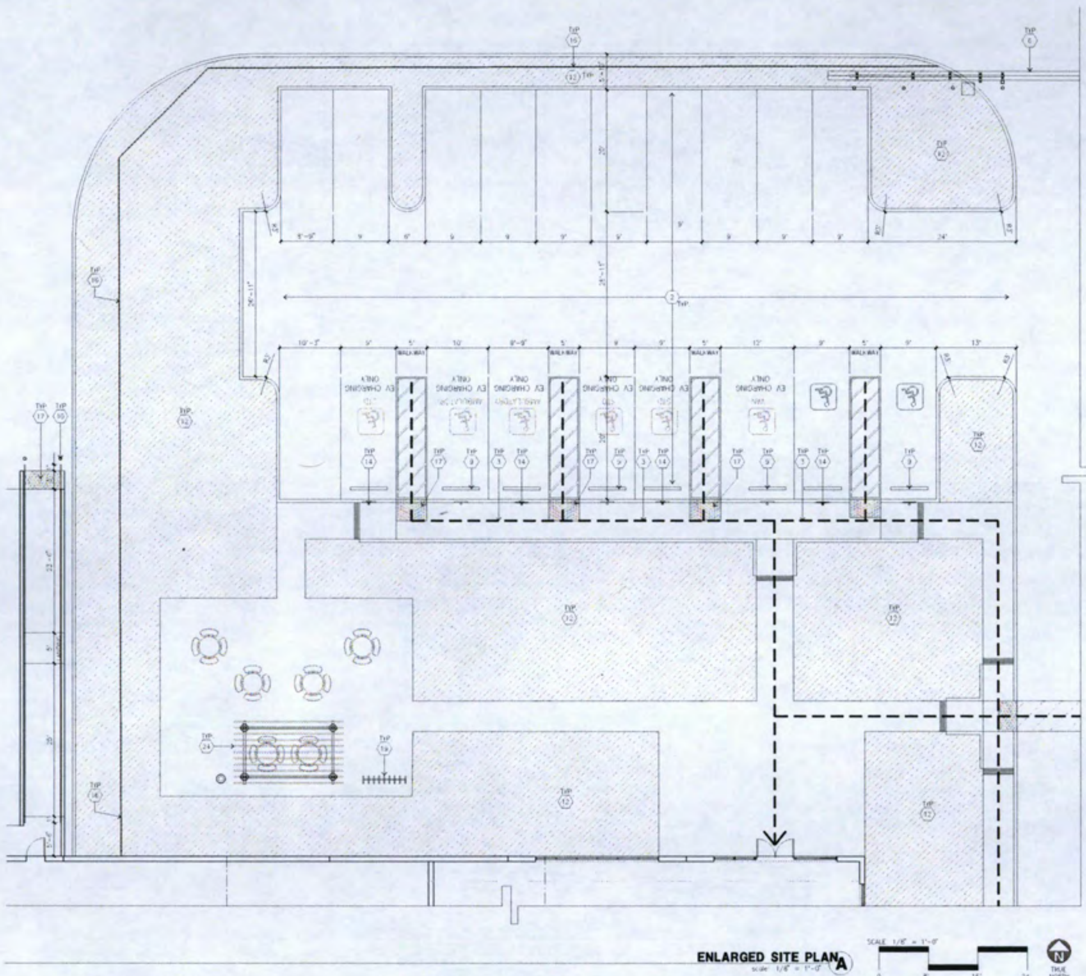
Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title: ENLARGED SITE PLAN

Project Number:	21290
Drawn by	CR
Date	5/3/23
Revision:	

Sheet:
DAB-A1.2



ENLARGED SITE PLAN (A)

scale 1/8" = 1'-0"

SCALE 1/8" = 1'-0"

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT
2. ASPHALT CONCRETE (AC) PAVING
3. CONCRETE WALKWAY. MEDIUM BROOM FINISH
4. TRUCK ENTRY SIGN. SEE DETAIL 15/DAB-A4.1
5. 5'-6"X5'-6"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH.
6. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. TRASH ENCLOSURE PER CITY STANDARDS. SEE DAB-A4.1
8. APPROXIMATE LOCATION OF TRANSFORMER.
9. PRE-CAST CONCRETE WHEEL STOP
10. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H
11. LIGHT POLE
12. LANDSCAPE. ALL LANDSCAPE AREAS INDICATED BY SHADING.
13. ACCESSIBLE ENTRY SIGN
14. ACCESSIBLE PARKING STALL SIGN
15. 8' HIGH TILT-UP SCREEN WALL
16. 8' HIGH METAL FENCE
17. TRUNCATED DOME
18. DRIVE THRU DOOR CONCRETE RAMP
19. BIKE RACK
20. EMPLOYEE ENTRANCE
21. TRASH COMPACTOR
22. DETENTION BASIN - SEE CIVIL PLANS
23. 3'X7' HOLLOW METAL EXTERIOR MAN DOOR
24. EMPLOYEE BREAK AREA.

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY TBD
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C" DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4" FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLIANCE FOR LANDSCAPING IF REQUIRED BY CLARK COUNTY
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT
15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB

SITE LEGEND

- CONCRETE PAVING
- ASPHALT CONCRETE PAVING
- STANDARD PARKING STALL (9'-0" X 20')
- ACCESSIBLE PARKING STALL (9' X 20') + 5' W/ ACCESSIBLE AISLE
- ACCESSIBLE PARKING (VAN) STALL (12' X 20') + 5' W/ ACCESSIBLE AISLE
- CLEAN AIR/VAN POOL/EV CONDUIT WITH FUTURE CHARGING INFRASTRUCTURE STALL (9' X 18')
- CLEAN AIR/VAN POOL/EV STALL (9' X 18')
- LANDSCAPED AREA
- PATH OF TRAVEL
- 26' FIRE WIDE FIRELANE

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LICENSED ARCHITECT · STATE OF CALIFORNIA · C26451 · 3-31-25 · RENEWAL DATE

OWNER
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OWNER'S REPRESENTATIVE

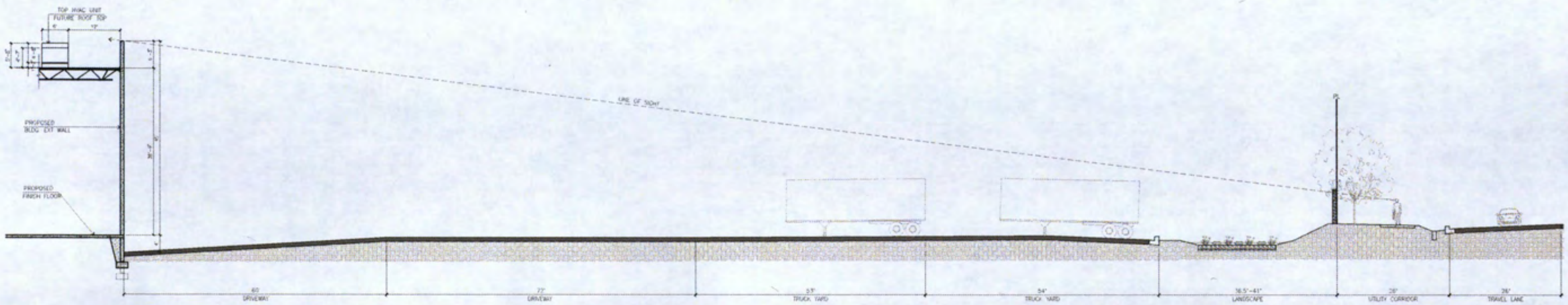
Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

Civil	MACKAY & SOMPS
Structural	-
Mechanical	-
Plumbing	-
Electrical	-
Landscape	GREEN DESIGN
Fire Protection	-
Soils Engineer	-

Title	ENLARGED SITE PLAN
Project Number	21290
Drawn by	CR
Date	5/3/23
Revision	

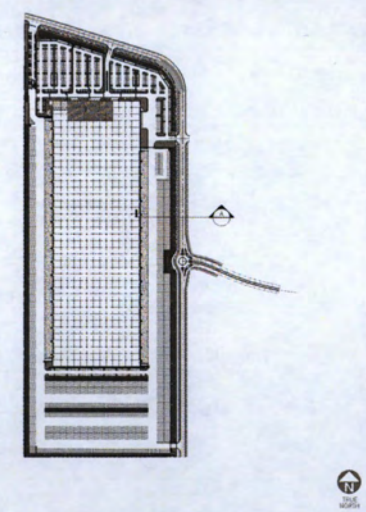
Sheet
DAB-A1.3



SITE SECTION @ DOS REIS ROAD (WEST) (B)
scale: 1/8" = 1'-0"

SCALE: 1/8" = 1'-0"
0 8' 16' 24'

KEYMAP



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LICENSED ARCHITECT · STATE OF CALIFORNIA · 3-31-25

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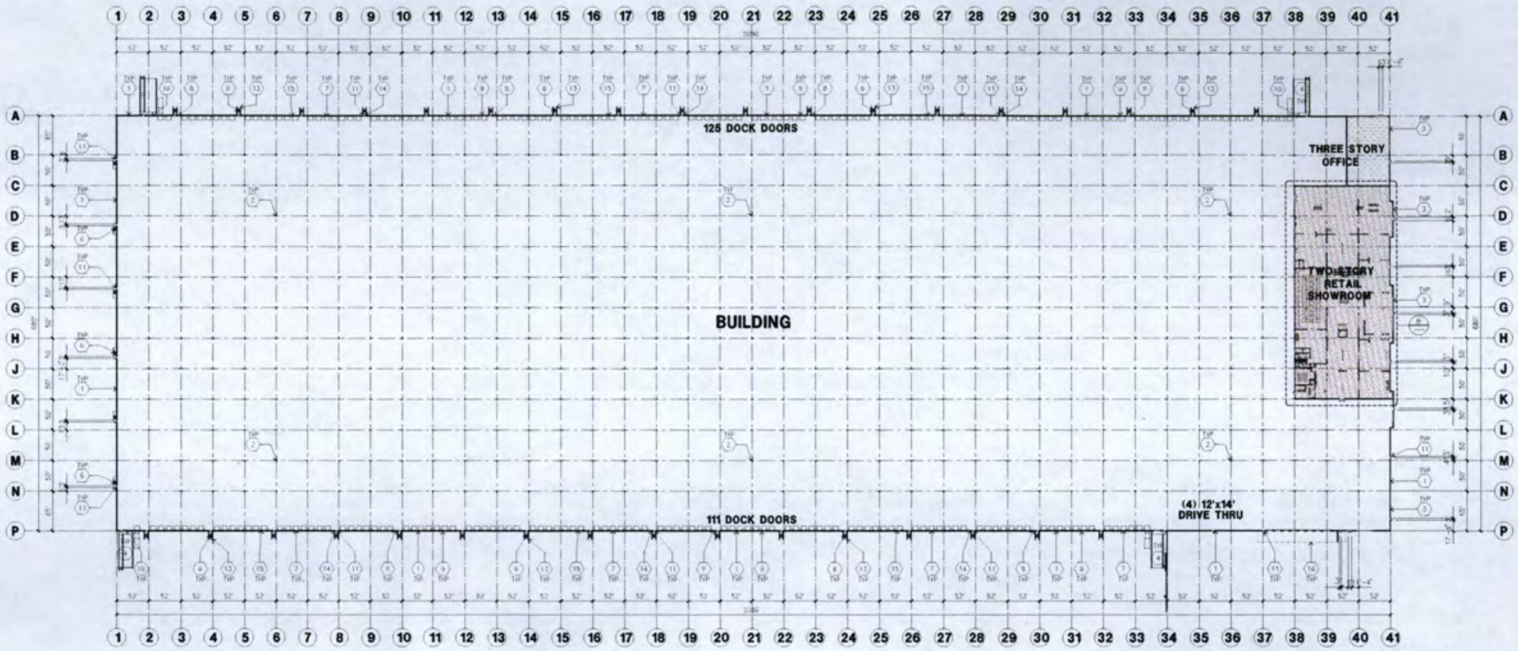
LATHROP, CA 95330

Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title:	ENLARGED SITE PLAN
Project Number:	21290
Drawn by:	CR
Date:	5/3/23
Revision:	

Sheet:
DAB-A1.4



OVERALL FLOOR PLAN (A)

FLOOR PLAN KEYNOTES

1. CONCRETE TILT-UP PANEL
2. STRUCTURAL STEEL COLUMN
3. TYPICAL STOREFRONT SYSTEM WITH GLAZING. SEE OFFICE BLOW-UP AND ELEVATIONS FOR SIZE, COLOR AND LOCATIONS
4. CONCRETE RAMP W/ 42" HIGH CONC TILT-UP GUARD WALL OR BUILDING WALL ON BOTH SIDE OF RAMP.
5. 5'-0"x5'-0"x4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH
6. EXTERIOR CONCRETE STAIR
7. 9' x 10' TRUCK DOOR, SECTIONAL O.H., STANDARD GRADE
8. LOUVERED OPENING FOR VENTILATION
9. DOCK DOOR BUMPER TYPICAL
10. 12' x 14' DRIVE THRU SECTIONAL O.H. STANDARD GRADE
11. 3' X 7' HOLLOW METAL EXTERIOR MAN DOOR
12. SOFFIT LINE ABOVE
13. CONC FILLED GUARD POST 6" DIA. U.N.O. 42"H.
14. EXTERIOR DOWNSPOUT WITH 2 OVERFLOW SCUPPER
15. Z GUARD
16. METAL CANOPY ABOVE
17. INTERIOR ROOF DRAIN WITH 2 OVERFLOW SCUPPER
18. DECORATIVE METAL MESH

FLOOR PLAN GENERAL NOTES

1. THIS BUILDING IS DESIGNED FOR HIGH PILE STORAGE WITH FIRE ACCESS MAN DOORS AT APPROXIMATELY 100' O.C. A SEPARATE PERMIT WILL BE REQUIRED FOR ANY RACKING/CONVEYER SYSTEMS.
2. FIRE HOSE LOCATIONS SHALL BE APPROVED PER FIRE DEPARTMENT
3. SEE "C" DRAWINGS FOR FINISH SURFACE ELEVATIONS
4. WAREHOUSE INTERIOR CONCRETE WALLS ARE PAINTED WHITE. COLUMNS ARE TO RECEIVE PRIMER ONLY. ALL GYP. BD. WALLS IN WAREHOUSE TO RECEIVE 1 COAT OF WHITE TO COVER
5. SLOPE POUR STRIP 1/2" TO EXTERIOR AT ALL MANDOOR EXITS
6. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE PANEL WALL, GRID LINE, OR FACE OF STUD U.N.O.
7. SEE CIVIL DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR TO VERIFY ACTUAL UTILITY LOCATIONS. PLUMBING/ELECTRICAL COORDINATION
8. SEE DOOR LEGEND FOR DOOR TYPES AND SIZES. NOTE: ALL DOORS PER DOOR SCHEDULE ARE FINISH OPENINGS
9. CONTRACTOR TO PROTECT AND KEEP THE FLOOR SLAB CLEAN. ALL EQUIPMENT TO BE DIAPERED INCLUDING CARS AND TRUCKS
10. ALL EXIT MAN DOORS IN WAREHOUSE TO HAVE ILLUMINATED EXIT SIGN HARDWARE
11. HIGHLY FLAMMABLE AND COMBUSTIBLE MATERIAL SHALL NOT BE USED OR STORED IN THIS BUILDING
12. EACH EXTERIOR EXIT DOOR SHALL BE IDENTIFIED BY A TACTILE EXIT SIGN WITH THE WORDS "EXIT". THE MOUNTING HEIGHT FOR SUCH SIGNAGE SHALL BE 60" FROM FINISH FLOOR LEVEL TO THE CENTER OF THE SIGN
13. NON-ACCESSIBLE DOOR: PROVIDE WARNING SIGN LOCATED IN THE INTERIOR SIDE PER CBC 11B-703.5
14. ALL ROOF MOUNTED MATERIALS SHALL BE FULLY SCREENED FROM PUBLIC VIEW, SEE A/A4.1 OFFICE SECTION.
15. PROVIDE FIRE RATED PANEL JOINTS AND CAULKING AT ALL OPENINGS ON 3HR FIRE RATED WALL. SEE A DRAWING FOR LOCATIONS
16. PROVIDE 2A 10B:C FIRE EXTINGUISHERS FOR OFFICE AREA (1 FOR EVERY 1,500 SF) AND 4A 40B:C FIRE EXTINGUISHERS FOR WAREHOUSE AREA (1 FOR EVERY 1,000 SF)

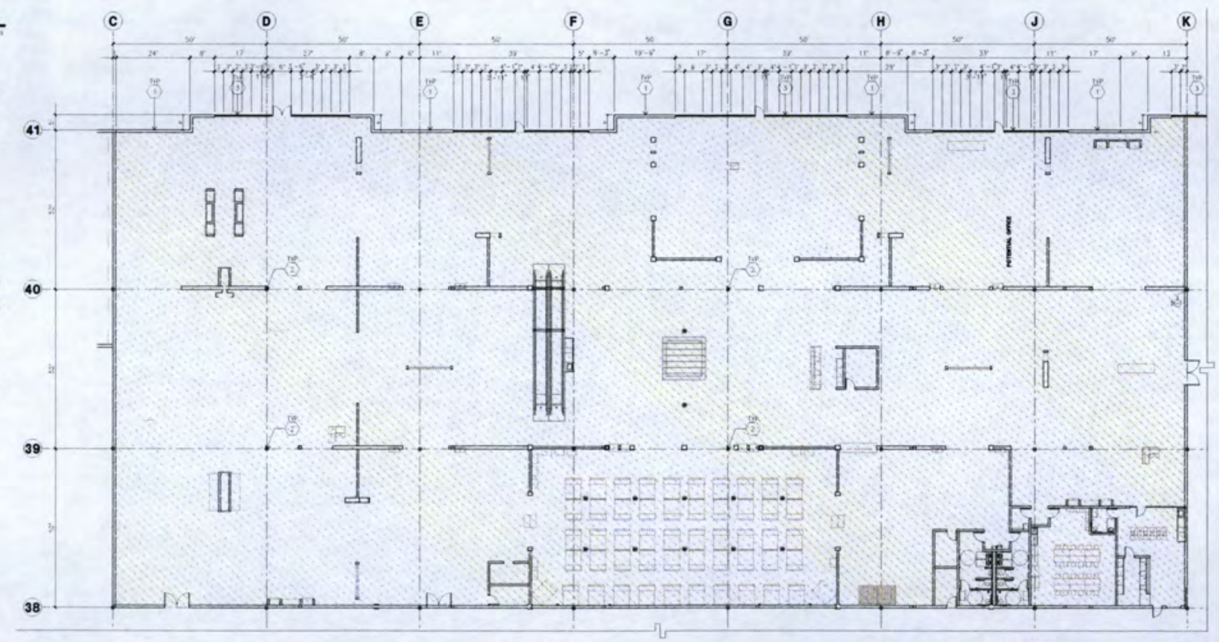
FLOOR SLAB & POUR STRIPS REQ.

THESE NOTES ARE VERY MIN

1. FLOOR COMPACTION - 95%
2. TRENCH COMPACTION - 90%
3. BUILDING FLOOR SLAB: SEE STRUCTURAL DRAWINGS
4. CONTRACTOR TO BUILD FOR CLASS V FLOOR PER A.C.I. 302-IR-96
5. CONCRETE SLAB TO HAVE STEEL FLOAT HARD TROWEL BURNISHED FINISH
6. CONTRACTOR TO CURE SLAB TO BE WET CURING USING BURLINE FOR 7 DAYS MIN
7. ALL EQUIPMENT & MOVING VEHICLES SHALL BE DIAPERED
8. NO CRANES, CONCRETE TRUCKS OR ANYTHING HEAVIER WILL BE PLACED ON THE SLAB
9. SLAB TO BE FF50 FL35 MEASURED WITHIN 24 HOURS
10. NO FLY ASH IN THE CONCRETE
11. WHERE INDICATED: PROVIDE VAPOR BARRIER (15MIL STEGO OR EQUAL) UNDER THE CONCRETE SLAB. PROVIDE SAND PER SOILS ENGINEER OR MANUFACTURER'S RECOMMENDATION.

CONCRETE SLAB IN FUTURE OFFICE AREAS, WHERE SAND OVER VISQUEEN ARE REQUIRED, SHALL BE NATURALLY HYDRATED WITHOUT USE OF BURLENE, CURING COMPOUND, OR RELEASE AGENTS.
CONTROL/CONSTRUCTION JOINTS SHALL NOT BE FILLED WITH MM-80 JOINT FILLER IN FUTURE OFFICE AREAS.

12. SEAL CONCRETE SLAB W/ "LAPIDOLITH" SEALER
13. 10" POUR STRIP AT TRUCK DOOR. 4FT. MAX. ELSEWHERE
14. ALL FLOOR SLAB NAIL OR BRACE FRAME HOLES FILLED WITH APPROVED 2 PART EPOXY COMPOUND TO MATCH CONCRETE COLOR. PEGA BOND LV 2000,BURKE EPOXY INJECTION RESIN OR EQUAL
15. PROVIDE FIRE EXTINGUISHERS PER FIRE DEPARTMENT REQUIREMENT
16. MM-80 AT SPEED BAY ONLY



ENLARGED FLOOR PLAN (B)

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OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

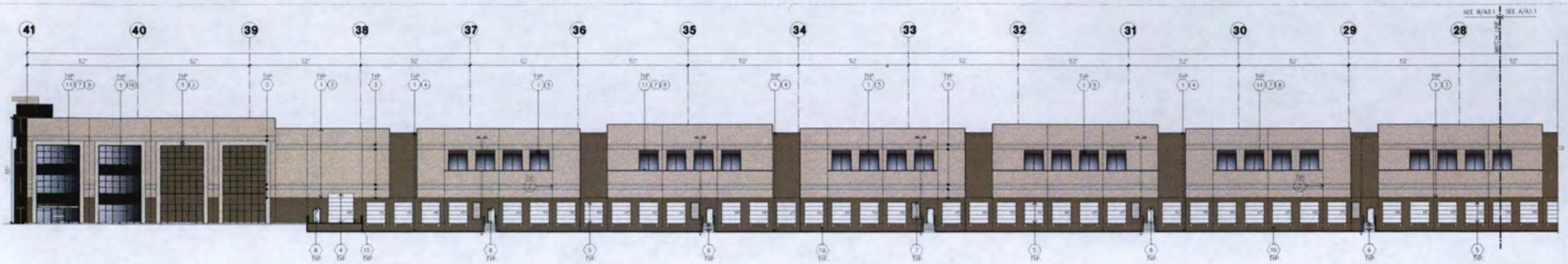
Consultants:

Civil	MACKAY & SOMPS
Structural	
Mechanical	
Plumbing	
Electrical	
Landscape	GREEN DESIGN
Fire Protection	
Soils Engineer	

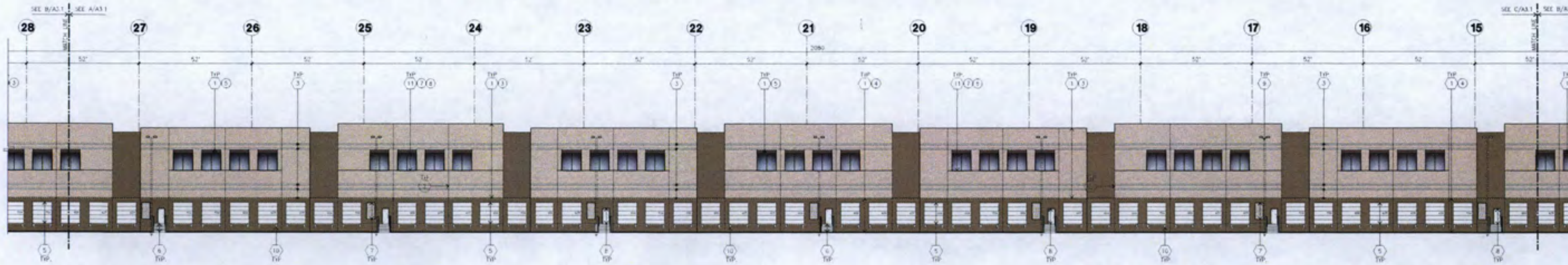
Title: OVERALL FLOOR PLAN

Project Number	21290
Drawn by	CR
Date	5/3/23
Revision	

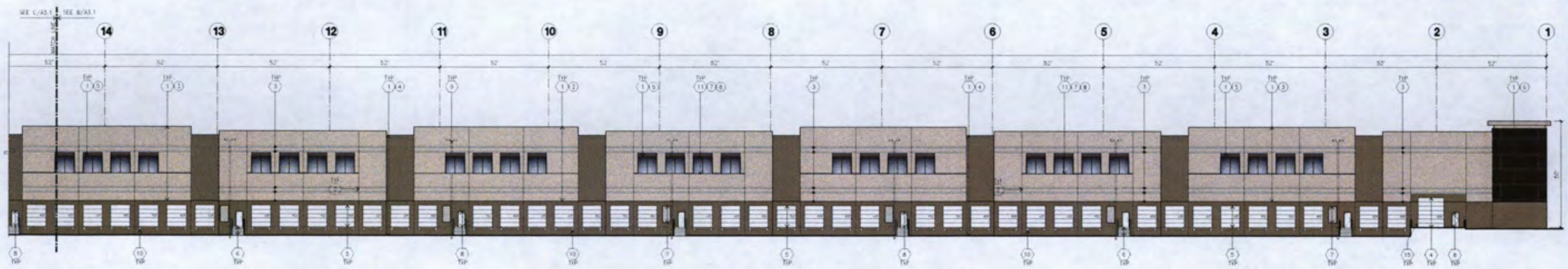
Sheet
DAB-A2.1



NORTH ELEVATION (A)
scale: 1" = 20'-0"



NORTH ELEVATION CONT. (B)
scale: 1" = 20'-0"



NORTH ELEVATION CONT. (C)
scale: 1" = 20'-0"

ELEVATION KEYNOTES

1. CONCRETE TILT-UP PANEL
2. PANEL JOINT
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. 12' X 14' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. INSULATED.
5. 9' X 10' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. INSULATED.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS, PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. 4' X 8' METAL LOUVER OPENING FOR VENTILATION. PAINT TO MATCH BUILDING COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. INSULATED.
9. EXTERIOR DOWN SPOUTS W/ 2 OVERFLOW SCUPPERS.
10. DOCK DOOR BUMPER TYPICAL.
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. METAL CANOPY
13. EXTERIOR LIGHT FIXTURE
14. NOT USED
15. CONC. FILLED GUARD POST. 6" DIA. U.N.O. 42"H.

ELEVATION GENERAL NOTES

1. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
2. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
3. T.O.P. EL = TOP OF PARAPET ELEVATION
4. F.F. = FINISH FLOOR ELEVATION
5. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS SHALL BE DESIGNED TO RESIST - MPH. EXPOSURE "C" WINDS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
6. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
7. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
8. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH. PROVIDE 1" DIAMETER HOLES AT CONCRETE WALL.
9. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
10. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON.

ELEVATION COLOR LEGEND/SCHED.

1. PAINT COLOR : SW 7006 EXTRA WHITE
2. PAINT COLOR : SW 7043 WORLDLY GRAY
3. PAINT COLOR : SW 9170 ACIER
4. PAINT COLOR : SW 7019 GAUNTLET GRAY
5. TRESPA - PARIS SILVER LM5101
6. TRESPA - WENGE NW09 7" X 14' COMPOSITE PANEL RUNNING BOND INSTALLATION
7. MULLIONS COLOR : CLEAR ANODIZED
8. GLAZING COLOR : BLUE REFLECTIVE
9. METAL CANOPY: SW 7006 EXTRA WHITE
10. PAINT COLOR : SW 7076 CYBERSPACE

GLAZING LEGEND

NOTE: ALL EXTERIOR AND INTERIOR GLAZING SHALL BE TEMPERED

INSULATED VISION GLASS

SPANDREL GLASS WITH CONCRETE BEHIND

SINGLE LITE VISION GLASS

IV : INSULATED VISION GLASS
1/4" **VISTACOOL PACIFICA** + 1/4" **SOLARBAN 60** CLEAR
1" INSULATED GLASS UNIT WITH 1/2" AIRSPACE AND 1/4" LITES
U: **0.27** SHGC: **0.21** VLT: **28%**
MINIMUM VT TO BE 0.42 PER 2016 CEC TABLE 140.3-B

SC : SPANDREL WITH CONCRETE BEHIND
1/4" **VISTACOOL PACIFICA** WITH **WARM GRAY** OPACICOAT PAINTED ON REFLECTIVE INSTALLED ON CONCRETE

V : VISION GLASS
1/4" **VISTACOOL PACIFICA**

MULLIONS : **ANODIZED CLEAR**

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LICENSED ARCHITECT C-29451 3-31-25 RENEWAL DATE STATE OF CALIFORNIA

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title:	ELEVATIONS
Project Number:	21290
Drawn by:	CR
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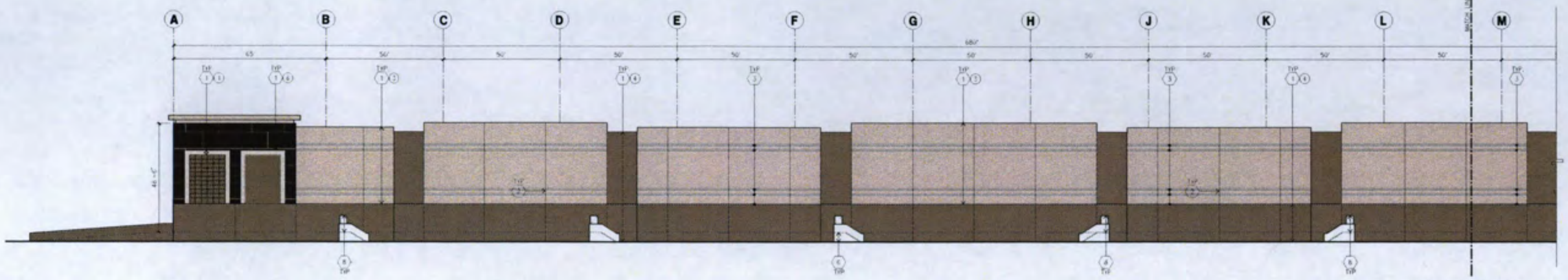
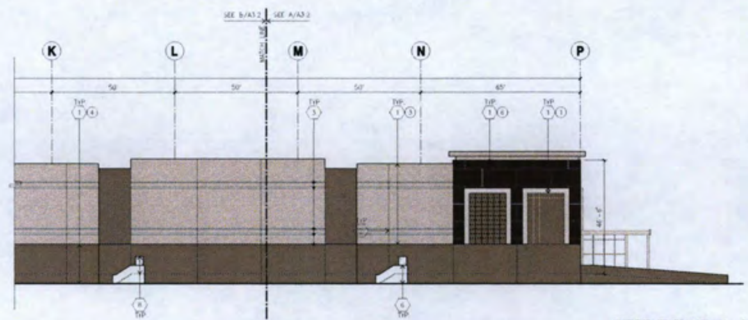


WEST ELEVATION (A)
scale: 1" = 20'-0"



WEST ELEVATION CONT. (B)
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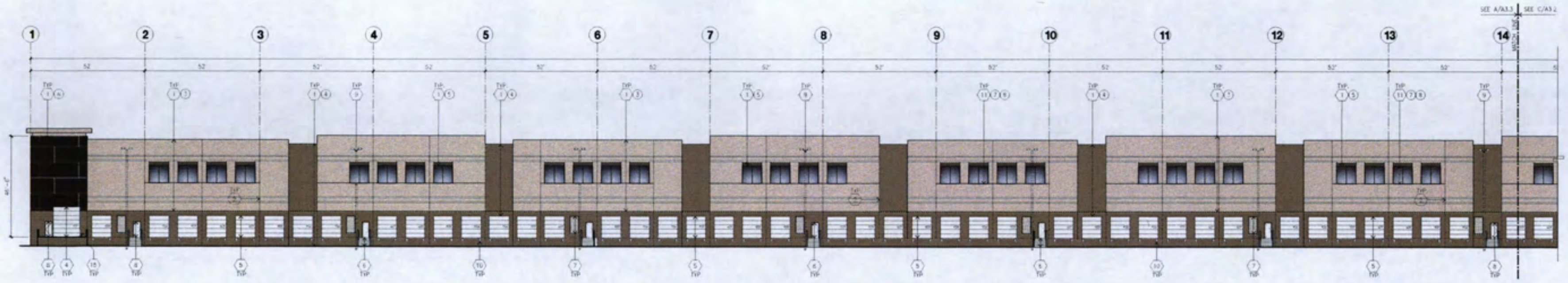

SOUTH ELEVATION (C)
scale: 1" = 20'-0"

ELEVATION KEYNOTES

1. CONCRETE TILT-UP PANEL
2. PANEL JOINT
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. 12' X 14' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. INSULATED.
5. 9' X 10' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. INSULATED.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. 4' X 4' METAL LOUVER OPENING FOR VENTILATION. PAINT TO MATCH BUILDING COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPPING ALL AROUND DOOR. INSULATED.
9. EXTERIOR DOWN SPOUTS W/ 2 OVERFLOW SCUPPERS.
10. DOCK DOOR BUMPER TYPICAL
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS. SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. METAL CANOPY.
13. EXTERIOR LIGHT FIXTURE
14. NOT USED
15. CONC. FILLED GUARD POST. 6" DIA. U.N.O. 42"H.

ELEVATION GENERAL NOTES

1. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE
2. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE
3. T.O.P. EL.= TOP OF PARAPET ELEVATION.
4. F.F. = FINISH FLOOR ELEVATION.
5. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS SHALL BE DESIGNED TO RESIST - MPH. EXPOSURE "C" WINDS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
6. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
7. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
8. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH. PROVIDE 1" DIAMETER HOLES AT CONCRETE WALL.
9. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
10. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON.

ELEVATION COLOR LEGEND/SCHED.

1. PAINT COLOR : SW 7006 EXTRA WHITE
2. PAINT COLOR : SW 7043 WORLDLY GRAY
3. PAINT COLOR : SW 9170 ACIER
4. PAINT COLOR : SW 7019 GAUNTLET GRAY
5. TRESPA - PARIS SILVER LM5101
6. TRESPA - WENGE NW09; 7' X 14' COMPOSITE PANEL RUNNING BOND INSTALLATION
7. MULLIONS COLOR : CLEAR ANODIZED
8. GLAZING COLOR : BLUE REFLECTIVE
9. METAL CANOPY: SW 7006 EXTRA WHITE
10. PAINT COLOR : SW 7076 CYBERSPACE

GLAZING LEGEND

NOTE: ALL EXTERIOR AND INTERIOR GLAZING SHALL BE TEMPERED

INSULATED VISION GLASS

SPANDREL GLASS WITH CONCRETE BEHIND

SINGLE LITE VISION GLASS

IV : INSULATED VISION GLASS
1/4" **VISTACOOL PACIFICA** + 1/4" **SOLARBAN 60** CLEAR
1" INSULATED GLASS UNIT WITH 1/2" AIRSPACE AND 1/4" LITES
U: **0.27** SHGC: **0.21** VLT: **26%**
MINIMUM VT TO BE 0.42 PER 2016 CEC TABLE 140.3-B

SC : SPANDREL WITH CONCRETE BEHIND
1/4" **VISTACOOL PACIFICA** WITH **WARM GRAY** OPACICOAT PAINTED ON REFLECTIVE. INSTALLED ON CONCRETE.

V : VISION GLASS
1/4" **VISTACOOL PACIFICA**

MULLIONS : **ANODIZED CLEAR**

HPA architecture

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tel: 949-863-1770
email: hpa@hparchs.com

LICENSED ARCHITECT C-29451 3-31-25 RENEWAL DATE STATE OF CALIFORNIA

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

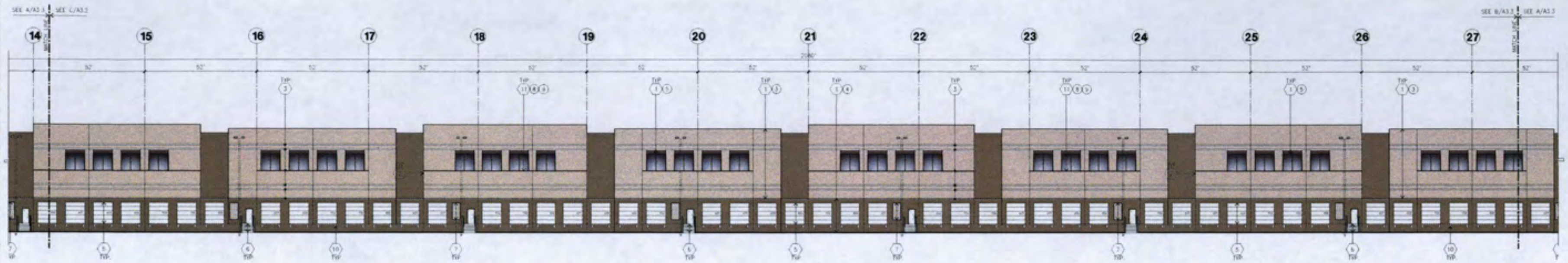
Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

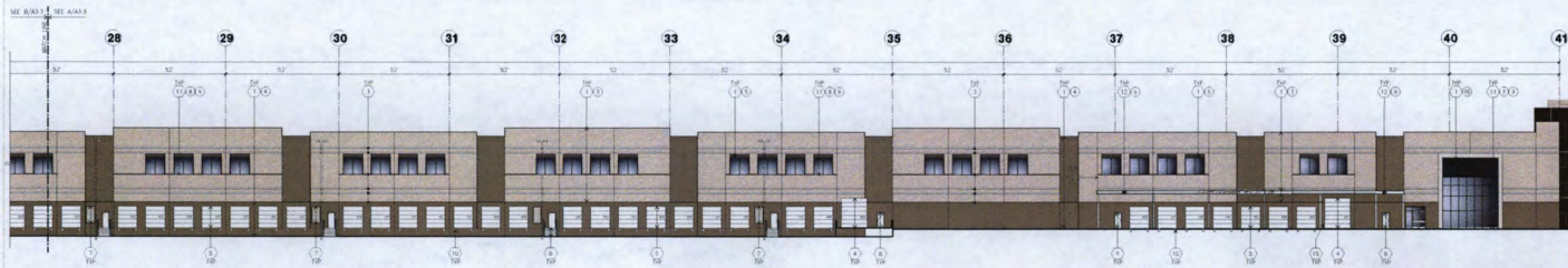
Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title	ELEVATIONS
Project Number	21290
Drawn by	CR
Date	5/3/23
Revision:	

Sheet
DAB-A3.2



SOUTH ELEVATION CONT. (A)
scale 1" = 20'-0"



SOUTH ELEVATION CONT. (B)
scale 1" = 20'-0"

EAST ELEVATION (C)
scale 1" = 20'-0"

ELEVATION KEYNOTES

1. CONCRETE TILT-UP PANEL
2. PANEL JOINT
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR U.N.O.
4. 12' X 14' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. INSULATED.
5. 9' X 10' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. INSULATED.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD FOR ADA REQUIREMENTS.
7. 4' X 4' METAL LOUVER OPENING FOR VENTILATION. PAINT TO MATCH BUILDING COLOR
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPPING ALL AROUND DOOR. INSULATED.
9. EXTERIOR DOWN SPOUTS W/ 2 OVERFLOW SCUPPERS.
10. DOCK DOOR BUMPER TYPICAL
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION
12. METAL CANOPY
13. EXTERIOR LIGHT FIXTURE
14. NOT USED
15. CONC. FILLED GUARD POST. 6" DIA. U.N.O., 42"H.

ELEVATION GENERAL NOTES

1. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
2. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
3. T.O.P. EL.= TOP OF PARAPET ELEVATION.
4. F.F. = FINISH FLOOR ELEVATION.
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8. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH. PROVIDE 1" DIAMETER HOLES AT CONCRETE WALL.
9. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
10. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

ELEVATION COLOR LEGEND/SCHED.

1. PAINT COLOR : SW 7006 EXTRA WHITE
2. PAINT COLOR : SW 7043 WORLDLY GRAY
3. PAINT COLOR : SW 9170 ACIER
4. PAINT COLOR : SW 7019 GAUNTLET GRAY
5. TRESPA - PARIS SILVER LM5101
6. TRESPA - WENGE NW09 7" X 14" COMPOSITE PANEL RUNNING BOND INSTALLATION
7. MULLIONS COLOR : CLEAR ANODIZED
8. GLAZING COLOR : BLUE REFLECTIVE
9. METAL CANOPY: SW 7006 EXTRA WHITE
10. PAINT COLOR : SW 7076 CYBERSPACE

GLAZING LEGEND

NOTE: ALL EXTERIOR AND INTERIOR GLAZING SHALL BE TEMPERED.

IV INSULATED VISION GLASS

SC SPANDREL GLASS WITH CONCRETE BEHIND

SINGLE LITE VISION GLASS

IV : INSULATED VISION GLASS
1/4" **VISTACOOL PACIFICA** + 1/4" **SOLARBAN 60** CLEAR
1" INSULATED GLASS UNIT WITH 1/2" AIRSPACE AND 1/4" LITES
U: **0.27** SHGC: **0.21** VLT: **26%**
MINIMUM VT TO BE 0.42 PER 2016 CEC TABLE 140.3-B

SC : SPANDREL WITH CONCRETE BEHIND
1/4" **VISTACOOL PACIFICA** WITH **WARM GRAY** OPACICOAT PAINTED ON REFLECTIVE INSTALLED ON CONCRETE

V : VISION GLASS
1/4" **VISTACOOL PACIFICA**

MULLIONS : **ANODIZED CLEAR**

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LICENSED ARCHITECT C-29451 3-31-25 RENEWAL DATE STATE OF CALIFORNIA

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

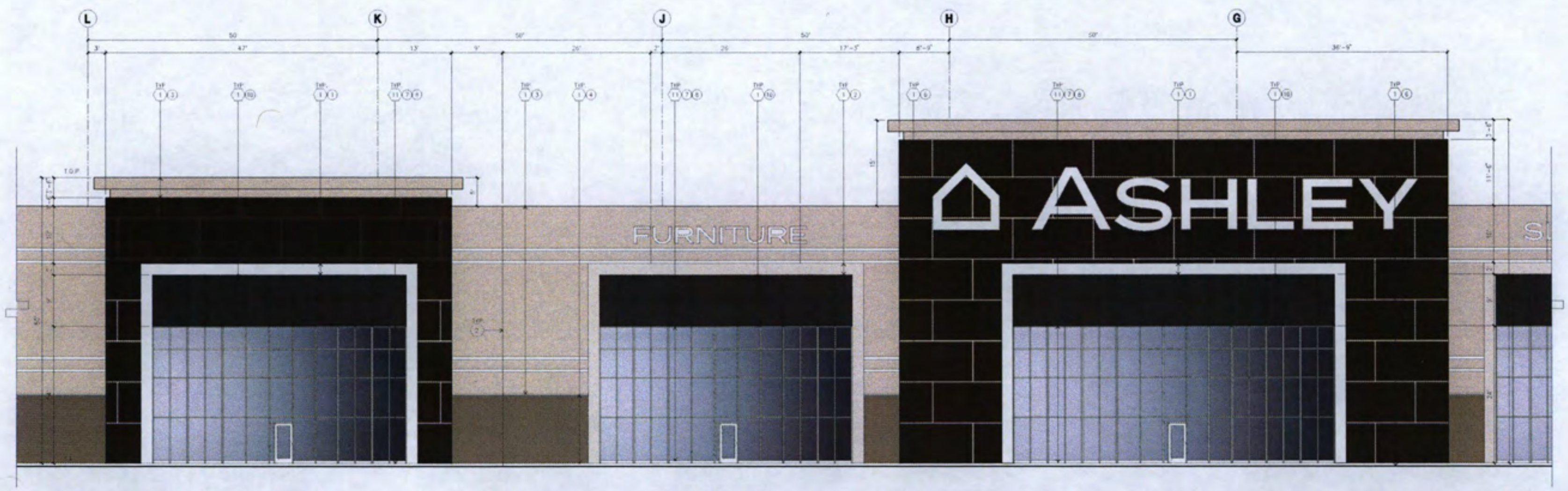
Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD
LATHROP, CA 95330

Consultants:

Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title	ELEVATIONS
Project Number	21290
Drawn by	CR
Date	5/3/23
Revision	

Sheet
DAB-A3.3



ENLARGED EAST ELEVATION (A)
scale: 1/8" = 1'-0"

ELEVATION KEYNOTES

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12. METAL CANOPY
13. EXTERIOR LIGHT FIXTURE.
14. NOT USED
15. CONC. FILLED GUARD POST 6" DIA. U.N.O. 42"H.

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6. TRESPA - WENGE NW09; 7" X 14' COMPOSITE PANEL RUNNING BOND INSTALLATION
7. MULLION COLOR - CLEAR ANODIZED
8. GLAZING COLOR - BLUE REFLECTIVE
9. METAL CANOPY SW 7006 EXTRA WHITE
10. PAINT COLOR - SW 7076 CYBERSPACE

GLAZING LEGEND

NOTE: ALL EXTERIOR AND INTERIOR GLAZING SHALL BE TEMPERED.

INSULATED VISION GLASS

SPANDREL GLASS WITH CONCRETE BEHIND

SINGLE LITE VISION GLASS

IV - INSULATED VISION GLASS
1/4" **VISTACOOL PACIFICA** + 1/4" **SOLARBAN 60** CLEAR
1" INSULATED GLASS UNIT WITH 1/2" AIRSPACE AND 1/4" LITES
U: **0.27** SHGC: **0.21** VLT: **28%**
MINIMUM VT TO BE 0.42 PER 2016 CEC TABLE 140.3-B

SC - SPANDREL WITH CONCRETE BEHIND
1/4" **VISTACOOL PACIFICA** WITH **WARM GRAY** OPACICOAT PAINTED ON REFLECTIVE. INSTALLED ON CONCRETE.

V - VISION GLASS
1/4" **VISTACOOL PACIFICA**

MULLIONS - **ANODIZED CLEAR**

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email: hpa@hparchs.com

LICENSED ARCHITECT C-29451 3-31-25 RENEWAL DATE STATE OF CALIFORNIA

OWNER
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hodgdon group
OWNER'S REPRESENTATIVE

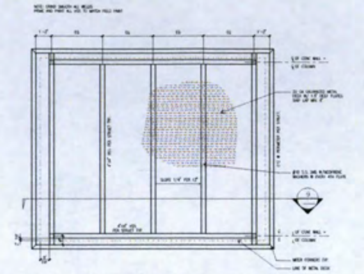
Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

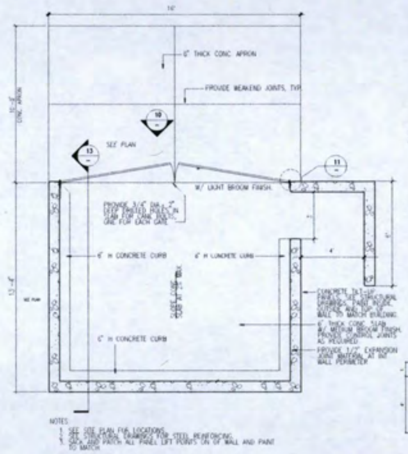
Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title	ELEVATIONS
Project Number	21290
Drawn by	CR
Date	5/3/23
Revision	

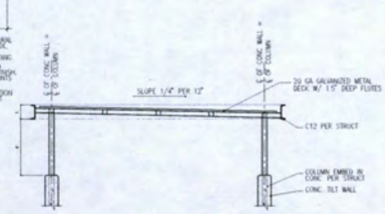
Sheet
DAB-A3.4



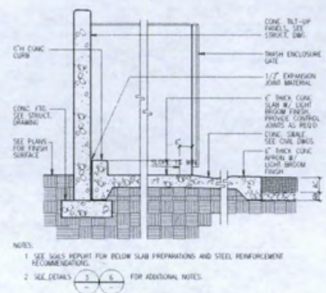
TRASH ENCLOSURE / ROOF PLAN (8)
SCALE: N.T.S.



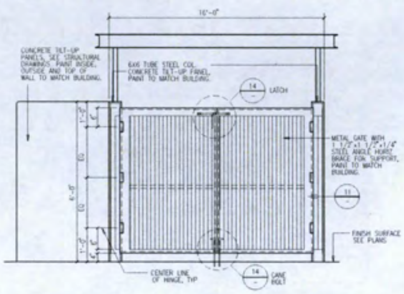
TRASH ENCLOSURE PLAN (12)
SCALE: N.T.S.



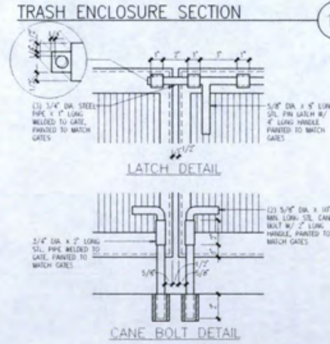
TRASH ENCLOSURE/ CANOPY DETAIL (9)
SCALE: N.T.S.



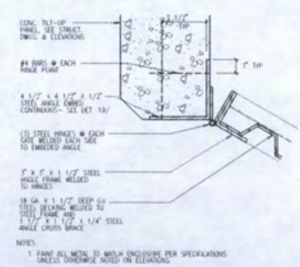
TRASH ENCLOSURE SECTION (13)



TRASH ENCLOSURE GATE ELEVATION (10)



TRASH ENCLOSURE GATE LATCHES (14)



TRASH ENCLOSURE GATE & HINGE (11)

TRUCK ENTRY SIGN (15)

TRUCK EXIT SIGN (16)

HPA architecture

hpa, inc.
18831 bardeen avenue - ste. #100 irvine, ca 92612
tel: 949-863-1770
email: hpa@hparchs.com

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hodgdon group
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Project:
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INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

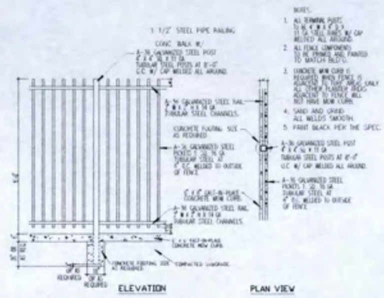
Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Sola Engineer:	-

Title:	TRASH ENCLOSURE
Project Number:	21290
Drawn by:	CR
Date:	5/3/23
Revision:	

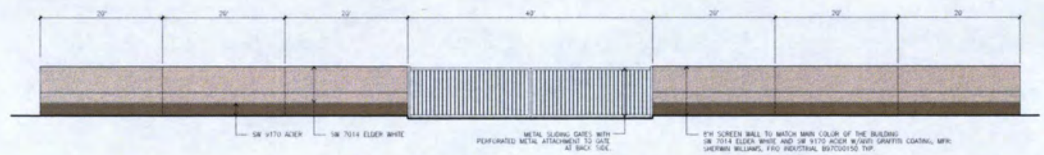
Sheet:
DAB-A4.1

SITE WALL LEGEND

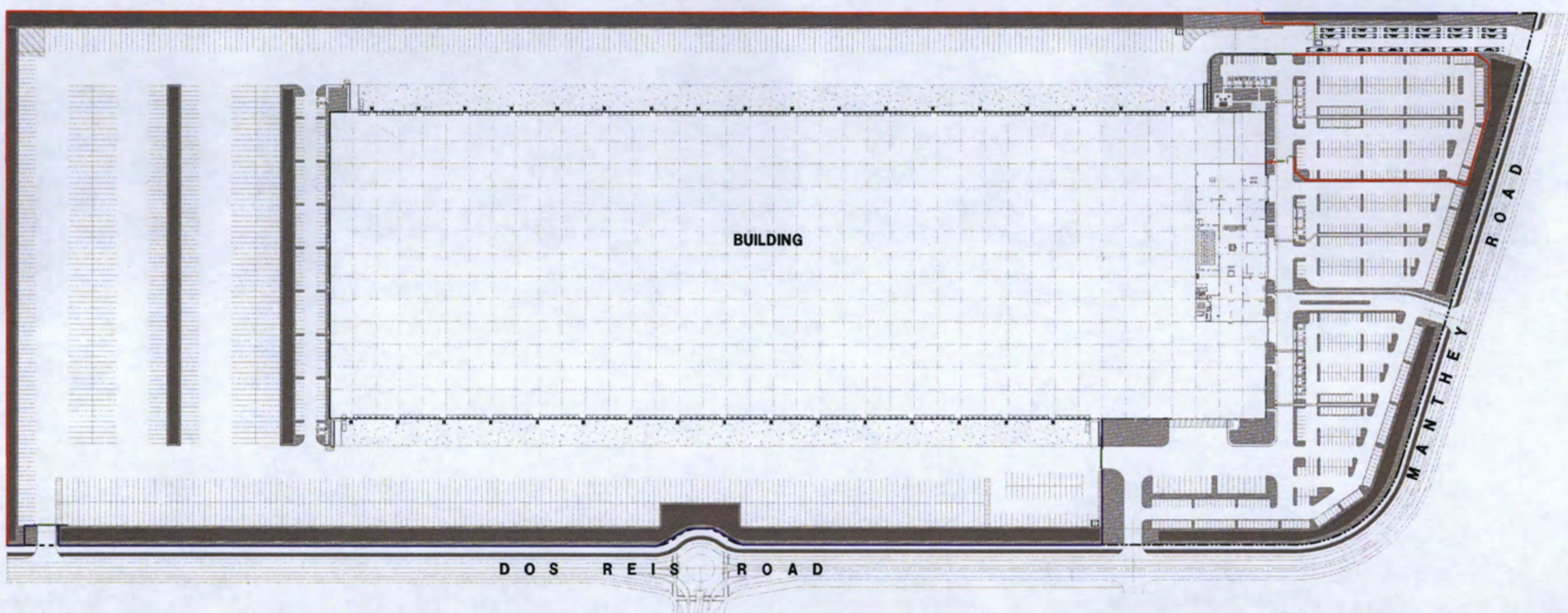
①	8' HIGH TILT-UP SCREEN WALL
②	8' HIGH WROUGHT IRON FENCE
③	8' HIGH STEEL GATE



WROUGHT IRON FENCE - TYP. ELEVATION (D)



8'H SCREEN WALL - TYP. ELEVATION (A)



OVERALL SITE PLAN (A)

HPA architecture

hpa, inc.
18831 bardeen avenue - ste. #100 irvine, ca 92612
tel: 949-863-1770
email: hpa@hparchs.com

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

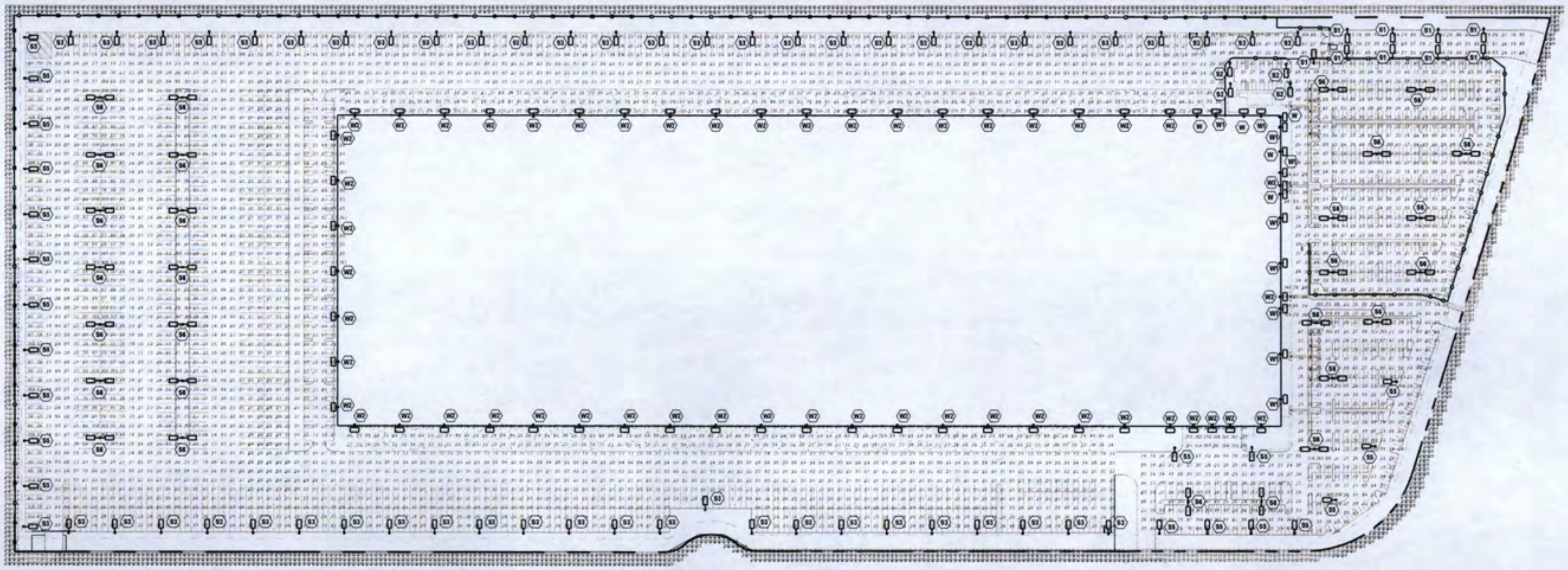
Civil:	MACKAY & SOMPS
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title: SCREEN WALL & FENCING PLAN

Project Number:	21290
Drawn by:	CR
Date:	5/3/23
Revision:	

Sheet:
DAB-A4.2

CAUTION: IF THIS SHEET IS NOT 30"X42" IT IS A REDUCED PRINT



SITE PHOTOMETRIC PLAN

1" = 100'

Statistics

Description	Symbol	Avg	Max	Min	Max/Min	Avg/Min
BEYOND PROP LINE	+	0.0 fc	0.6 fc	0.0 fc	N/A	N/A
Customer Pick Up	+	19.7 fc	34.6 fc	9.8 fc	3.5:1	2.0:1
Customer Pick Up Parking	+	6.8 fc	42.3 fc	0.3 fc	141.0:1	22.7:1
General Truck Parking	+	2.7 fc	45.5 fc	0.0 fc	N/A	N/A
North Docking Area	+	7.7 fc	23.6 fc	2.6 fc	9.1:1	3.0:1
North Retail Entrance	+	7.7 fc	17.6 fc	2.9 fc	6.1:1	2.7:1
North Tenant Parking	+	4.9 fc	47.2 fc	0.1 fc	472.0:1	49.0:1
South Docking Area	+	7.9 fc	23.9 fc	2.7 fc	8.9:1	2.9:1
South Retail Entrance	+	10.3 fc	19.1 fc	5.0 fc	3.8:1	2.1:1
South Tenant Parking	+	6.3 fc	47.9 fc	0.1 fc	479.0:1	63.0:1
Truck Entrance	+	6.5 fc	13.9 fc	0.4 fc	34.8:1	16.3:1

Nominal Lumen Code	Type V				Type IV				Type III				Input Current
	Actual Lumens	Wattage	LPW	BUG Rating	Actual Lumens	Wattage	LPW	BUG Rating	Actual Lumens	Wattage	LPW	BUG Rating	
A1	12,630lm	76w	165	B4-U0-G2	12,122lm	76w	159	B3-U0-G2	12,587lm	76w	165	B3-U0-G2	0.27A
B1	18,252lm	111w	164	B4-U0-G2	17,518lm	111w	158	B3-U0-G3	18,190lm	111w	164	B3-U0-G3	0.40A
C1	22,196lm	139w	160	B5-U0-G3	21,294lm	139w	153	B3-U0-G3	22,111lm	139w	159	B3-U0-G3	0.50A
D1	29,516lm	176w	168	B5-U0-G4	28,329lm	176w	161	B3-U0-G4	29,416lm	176w	167	B4-U0-G3	0.63A
E1	32,875lm	191w	172	B5-U0-G4	31,554lm	191w	165	B3-U0-G4	32,765lm	191w	171	B4-U0-G4	0.69A
F1	37,319lm	221w	169	B5-U0-G4	35,725lm	221w	162	B4-U0-G4	37,094lm	221w	168	B4-U0-G4	0.80A
G1	49,402lm	289w	171	B5-U0-G5	47,416lm	289w	164	B4-U0-G5	49,236lm	289w	171	B4-U0-G4	1.04A
H1	64,860lm	400w	162	B5-U0-G5	62,291lm	400w	156	B4-U0-G5	64,671lm	400w	162	B4-U0-G5	1.44A

GENERAL NOTES

A. SEE ARCHITECTURAL, MECHANICAL, PLUMBING, LANDSCAPE, AND CIVIL DRAWINGS FOR ADDITIONAL INFORMATION.

B. HOMERUN ALL EXTERIOR LIGHTING VIA ASTRONOMICAL TIME CLOCK IN GUARD HOUSE OR ELECTRICAL ROOM AS INDICATED.

C. ALL EXTERIOR LIGHTING INSTALLATIONS AND LAMP TYPE SHALL COMPLY WITH LOCAL CITY ADOPTED OUTDOOR LIGHTING REGULATIONS.

D. GENERAL CONTRACTOR SHALL VISIT SITE AND ENSURE ALL BIDDING SUBCONTRACTOR'S VISIT SITE PRIOR TO BID. G.C. WILL BE RESPONSIBLE FOR ALL EXISTING CONDITIONS MEETING OR EXCEEDING THOSE DEPICTED WITH PLANS. WHERE EXISTING CONDITIONS ARE NOT AS SHOWN, G.C. SHALL INCLUDE IN BID THE NECESSARY LABOR AND MATERIALS TO ENSURE THE EXISTING SHELL MEETS OR EXCEEDS THE INTENT OF THE CONSTRUCTION PLANS.

E. PER 130.2 (C)(2) ALL INSTALLED OUTDOOR LIGHTING SHALL BE CIRCUITED AND INDEPENDENTLY CONTROLLED FROM OTHER ELECTRICAL LOADS BY AN AUTOMATIC SCHEDULING CONTROL.

F. ALL BUILDING LIGHTING BRANCH CIRCUITRY SHALL BE #10 AWG MINIMUM WIRE SIZE IN 3/4" CONDUIT.

G. PLANNING DEPARTMENT APPROVAL OF EXTERIOR LIGHTING AND SIGNS SUPERCEDE BUILDING DEPARTMENT.

H. LANDSCAPE LIGHTING SHALL BE CIRCUITED SEPARATELY FROM BUILDING AND PARKING LIGHTING.

I. PROVIDE LOCAL DISCONNECTING MEANS FOR ALL SIGNS PER

J. PROVIDE BACK LIGHT BLOCK TO ALL PERIMETER LIGHT FIXTURES.

PROPOSED LUMINAIRE SCHEDULE

TYPE	MTG	LAMP(S) QTY	LAMP(S) CODE WATT/LUMENS COLOR	LUMINAIRE DESCRIPTION	MANUFACTURER & CATALOG NUMBER	INPUT WATTS VOLTS	REFERENCE NOTES
S1	POLE MOUNTED +25' AFF	—	LED 29516LM 4000K	SINGLE HEAD LED POLE LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 3 DISTRIBUTION, 22' POLE WITH 36" BASE, BUG RATING B4-U0-G3	ORION LIGHTING IAHP1-D1-HMV-FD-750-BR-T3-WB20-EXT-IAHP-ADJ-001	180W 277V	OR APPROVED EQUAL
S2	POLE MOUNTED +25' AFF	—	LED 29516LM 4000K	SINGLE HEAD LED POLE LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 5 DISTRIBUTION, 22' POLE WITH 36" BASE, BUG RATING B5-U0-G4	ORION LIGHTING IAHP1-D1-HMV-FD-750-BR-T5-WB20-EXT-IAHP-ADJ-001	180W 277V	OR APPROVED EQUAL
S3	POLE MOUNTED +25' AFF	—	LED 29516LM 4000K	SINGLE HEAD LED POLE LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 4 DISTRIBUTION, 22' POLE WITH 36" BASE, BUG RATING B3-U0-G4	ORION LIGHTING IAHP1-D1-HMV-FD-750-BR-T4-WB20-EXT-IAHP-ADJ-001	180W 277V	OR APPROVED EQUAL
S4	POLE MOUNTED +25' AFF	—	LED 59032LM 4000K	DOUBLE HEAD LED POLE LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 4 DISTRIBUTION, 22' POLE WITH 36" BASE, BUG RATING B3-U0-G4	ORION LIGHTING IAHP1-D1-HMV-FD-750-BR-T4-WB20-EXT-IAHP-ADJ-001	360W 277V	OR APPROVED EQUAL
S5	POLE MOUNTED +25' AFF	—	LED 64890LM 4000K	SINGLE HEAD LED POLE LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 4 DISTRIBUTION, 22' POLE WITH 36" BASE, BUG RATING B4-U0-G5	ORION LIGHTING IAHP1-H1-HMV-FD-750-BR-T4-WB20-EXT-IAHP-ADJ-001	400W 277V	OR APPROVED EQUAL
S6	POLE MOUNTED +25' AFF	—	LED 129,780 4000K	DOUBLE HEAD LED POLE LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 4 DISTRIBUTION, 22' POLE WITH 36" BASE, BUG RATING B3-U0-G4	ORION LIGHTING IAHP1-H1-HMV-FD-750-BR-T4-WB20-EXT-IAHP-ADJ-001	800W 277V	OR APPROVED EQUAL
W1	+25' AFF	—	LED 29516LM 4000K	EXTERIOR WALL LED LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 4 DISTRIBUTION, BUG RATING B3-U0-G4	IAHP1-D1-HMV-FD-750-BR-T4-WB20-EXT-IAHP-ADJ-001	180W 277V	OR APPROVED EQUAL
W2	+25' AFF	—	LED 64890LM 4000K	EXTERIOR WALL LED LIGHT, BUTTON TYPE PHOTOCELL, OCCUPANCY SENSOR, TYPE 4 DISTRIBUTION, B4-U0-G5	IAHP1-H1-HMV-FD-750-BR-T4-WB20-EXT-IAHP-ADJ-001	400W 277V	OR APPROVED EQUAL
W	WALL +24"	—	LED 3518 LM 4000K	SWIVEL ARM, WALL WASH, 5x5 BEAM, BRONZE, 0-10V DIMMING, AIM TOWARD BUILDING TO LIGHT 38' AFG, 85 CRI, INCLUDE ALL MOUNTING HARDWARE	RAB LIGHTING FLED39/D10 39 N B55	39W 120/277V	OR APPROVED EQUAL

HPA architecture

hpa, inc.
18831 bardeen avenue, - ste. #100
irvine, ca
92612
tel: 949-863-1770
fax: 949-863-0851
email: hpa@hparchs.com

Concept Electrical Solutions, Inc.

301-036

OWNER

ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group

OWNER'S REPRESENTATIVE

Project:

ASHLEY LATHROP PHOTOMETRIC

LAS VEGAS, NV

Consultants:

CIVIL LOCHSA
STRUCTURAL
MECHANICAL
PLUMBING
ELECTRICAL
LANDSCAPE
FIRE PROTECTION
SOILS ENGINEER

Title

Project Number 301-037
Drawn by R.C.A.
Date 12-16-2022
Revision

Sheet

E1.0

ATTACHMENT " 7 "

ASHLEY FURNITURE DISTRIBUTION
SITE PLAN REVIEW
CITY OF LATHROP, SAN JOAQUIN COUNTY, CALIFORNIA
MAY 2023

VICINITY MAP
1" = 2000'

GENERAL NOTES:

1) OWNERS: DOS REIS RANCH, INC
7000 SOUTH ISLAND DRIVE
STOCKTON, CA 95206
MROB3808@AOL.COM
(209) 471-4083

2) APPLICANT: HOGDON GROUP REALTY, INC.
1461 E. COOLEY DRIVE, SUITE 230
COLTON, CA 92324
CONTACT: SEAN ASMUS
SEANA@HOGDONGROUP.COM

3) CIVIL ENGINEER: MACKAY & SOMPS CIVIL ENGINEERS, INC
5142 FRANKLIN DRIVE, STE B
PLEASANTON, CA 94588
CONTACT: JACQUELYN BAYS
JBAYS@MSCE.COM
(925) 225-0690

4) GEOTECHNICAL: TERRACON CONSULTANTS, INC.
902 INDUSTRIAL WAY
LODI, CA 95240
(209) 367-3701

5) ASSESSOR'S PARCEL NUMBERS: 192-020-140

6) TOTAL AREA: 89.82± ACRES

7) TOTAL NUMBER OF LOTS: 1 EXISTING LOT

8) SUBJECT PROPERTY SHOWN TO BE IN ZONE 'X' ON THE FEDERAL EMERGENCY MANAGEMENT AGENCY'S FLOOD INSURANCE RATE MAP 06077C0610F (AREAS PROTECTED BY LEVEES FROM 1% ANNUAL CHANCE FLOOD). EFFECTIVE DATE OCTOBER 16, 2009. LOMR DATE SEPTEMBER 2, 2011

9) UTILITIES:
POTABLE WATER DISTRIBUTION: CONNECTION TO CITY OF LATHROP WATER SYSTEM.

SANITARY SEWER CONVEYANCE: CONNECTION TO CITY OF LATHROP SEWER SYSTEM.

STORM DRAIN: CONNECTION TO CITY OF LATHROP STORM DRAIN SYSTEM. DETENTION TO BE SIZED IN ACCORDANCE WITH CENTRAL LATHROP SPECIFIC PLAN PHASE 2 AMENDMENT AND THE CITY OF LATHROP DESIGN & CONSTRUCTION STANDARDS.

STORMWATER QUALITY: STORMWATER QUALITY REQUIREMENTS TO BE MET THROUGH BIORETENTION AREAS AND/OR INFILTRATION BASINS. BASINS TO BE SIZED IN ACCORDANCE WITH THE MULTI-AGENCY POST-CONSTRUCTION STORMWATER STANDARDS MANUAL.

10) GAS AND ELECTRIC SERVICE TO BE PROVIDED BY PACIFIC GAS & ELECTRIC. INSTALLATION SHALL BE UNDERGROUND IN ACCORDANCE WITH CITY REQUIREMENTS.

11) EXISTING DISTRIBUTION POWER POLES AND OVERHEAD POWER LINES THAT ARE AND UNDER 35KV OR CONFLICT WITH IMPROVEMENTS SHALL BE RELOCATED, REMOVED OR UNDERGROUNDED IN ACCORDANCE WITH CITY REQUIREMENTS.

12) TELEPHONE SERVICE TO BE PROVIDED BY VERIZON. INSTALLATION SHALL BE UNDERGROUND IN ACCORDANCE WITH CITY REQUIREMENTS.

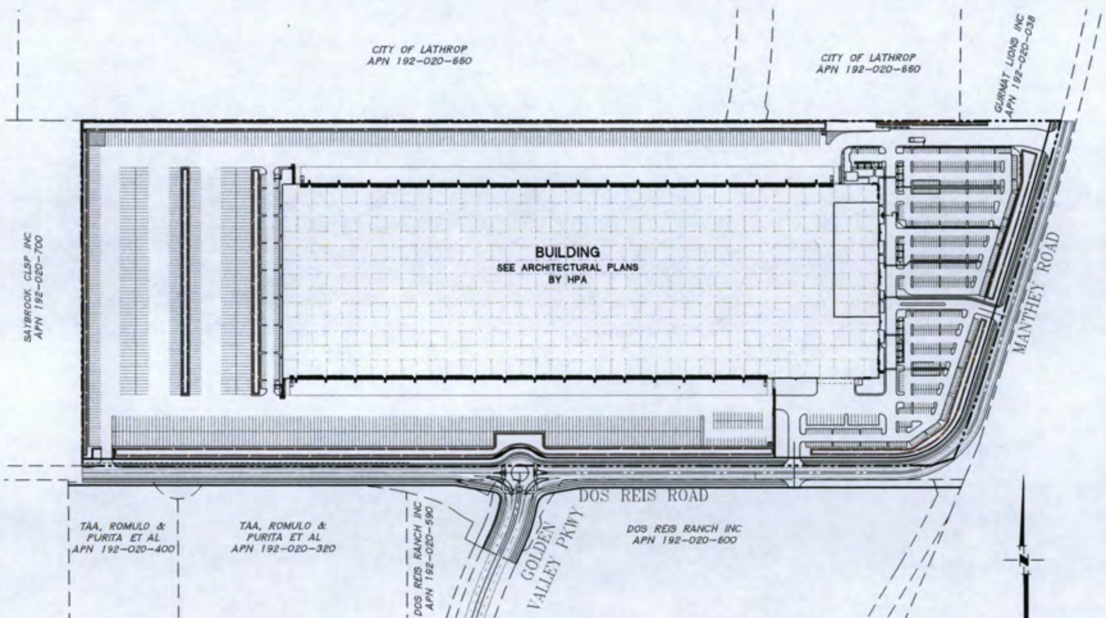
13) EXISTING GENERAL PLAN LAND USE DESIGNATION: L1-CL LIMITED INDUSTRIAL (NO CHANGES PROPOSED).

14) UTILITY LOCATIONS, UTILITY SIZES, AND GRADING ARE PRELIMINARY AND SUBJECT TO FINAL ENGINEERING DESIGN.

15) BOUNDARY INFORMATION AS SHOWN BASED ON A SURVEY COMPLETED BY MACKAY & SOMPS DATED NOVEMBER 2013. SURVEY IS BASED ON RECORD INFORMATION.

16) CONTOUR INTERVAL IS AS SHOWN. THE ELEVATION DATUM IS PER THE CITY OF LATHROP BENCHMARKS (NGVD 29). AERIAL TOPO DATED MAY 22, 2013.

17) PRELIMINARY GEOTECHNICAL REPORT BY TERRACON DATED AUGUST 16, 2021.



OVERALL SITE PLAN
SCALE: 1"=200'

0 100 200 400
SCALE: 1"=200'

SHEET INDEX

SHEET	DESCRIPTION
C-1	COVER SHEET
C-2	BOUNDARY AND EXISTING CONDITIONS
C-3	HORIZONTAL CONTROL PLAN
C-4	RIGHT-OF-WAY DEDICATION AND PUBLIC STREET SECTIONS
C-5	PRELIMINARY GRADING AND DRAINAGE PLAN
C-6	PRELIMINARY UTILITY PLAN
C-7	PRELIMINARY STORMWATER QUALITY PLAN
C-8	STAA TRUCK ACCESS PLAN
C-9	FIRE TRUCK ACCESS PLAN
C-10	REFUSE TRUCK ACCESS PLAN

LEGEND

EXISTING	DESCRIPTION	PROPOSED
	PROJECT BOUNDARY	
	RIGHT-OF-WAY	
	PROPERTY LINE	
	CENTERLINE	
	EASEMENT	
	WATER PIPE	
	FIRE WATER PIPE	
	RECYCLED WATER PIPE	
	SEWER PIPE (GRAVITY)	
	SEWER PIPE (FORCEMAIN)	
	STORM DRAIN PIPE (GRAVITY)	
	STORM DRAIN FORCE MAIN PIPE	

THIS SITE PLAN WAS APPROVED WITH CONDITIONS ON ____________

REGISTERED PROFESSIONAL ENGINEER CHRISTIAN T. RAGAN No. 60473 CIVIL STATE OF CALIFORNIA

NO.	REVISION	DATE

DATE: MAY 2023
SCALE: 1"=200'
DRAWN BY: DG
DESIGNED BY: JB
CHECKED BY: CTR

MACKAY & SOMPS

PLANS PREPARED UNDER THE DIRECTION OF: CHRISTIAN T. RAGAN RCE # C60473

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
COVER SHEET
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

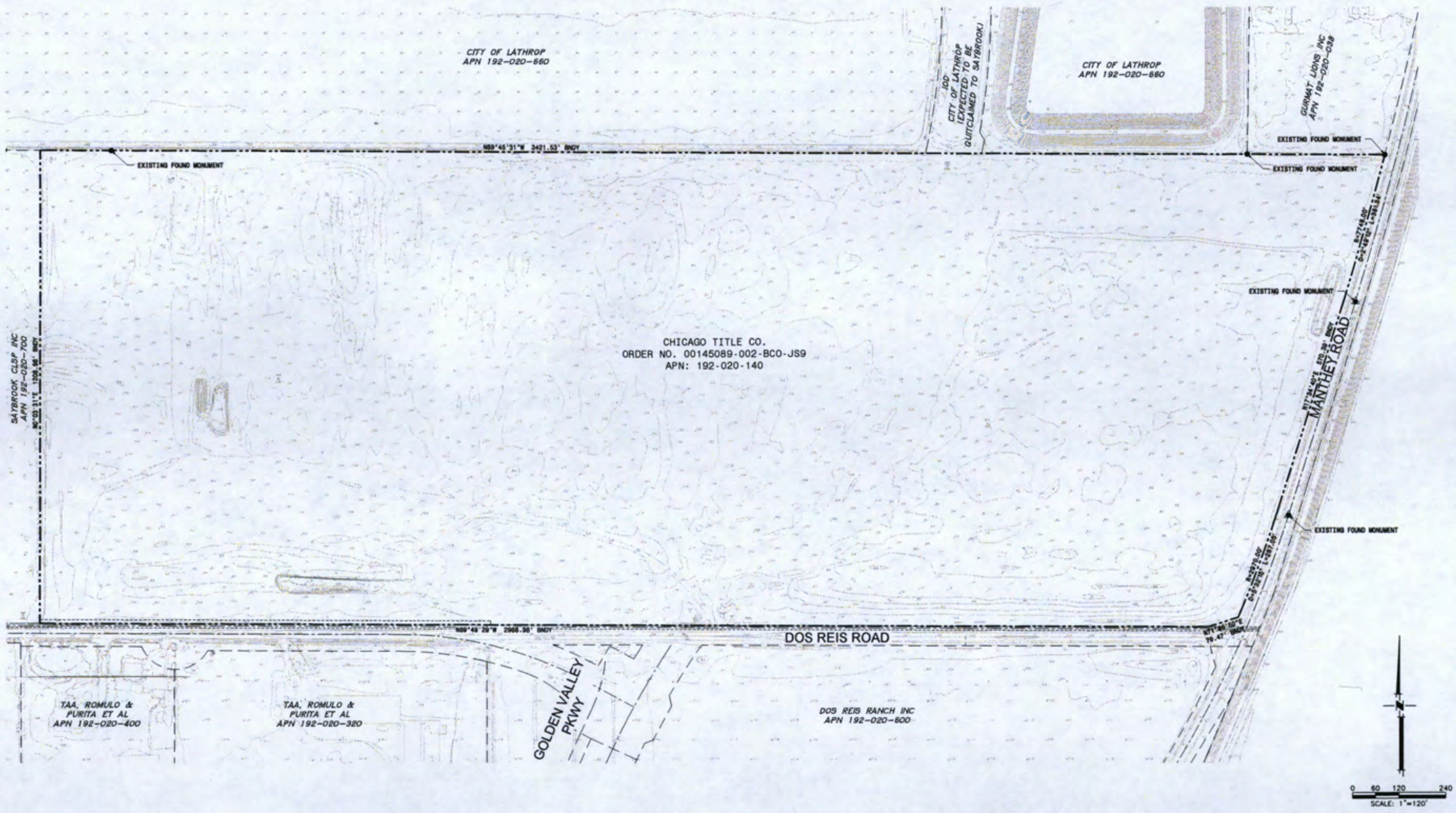
PROJECT NO. 25244.000.P

SHT C-1 OF 10

NOTES:

1. TOPOGRAPHIC, PLANIMETRICS, AND BOUNDARY INFORMATION WAS COMPILED FROM:
   - PRELIMINARY TITLE REPORT BY FIRST AMERICAN COMPANY, ORDER NO.: NCS-6700746-(TC), EFFECTIVE DATE: JULY 14, 2021.
   - AERIAL SURVEY DATED MAY 22, 2013 (NGVD 29).
2. ANY EXISTING GROUND WATER WELLS TO BE REMOVED

REGISTERED PROFESSIONAL ENGINEER CHRISTIAN T. RAGAN No 60473 CIVIL STATE OF CALIFORNIA



DATE:	MAY 2023
SCALE:	1"=120'
DRAWN BY:	DG
DESIGNED BY:	JB
CHECKED BY:	CTR

NO	REVISION	DATE

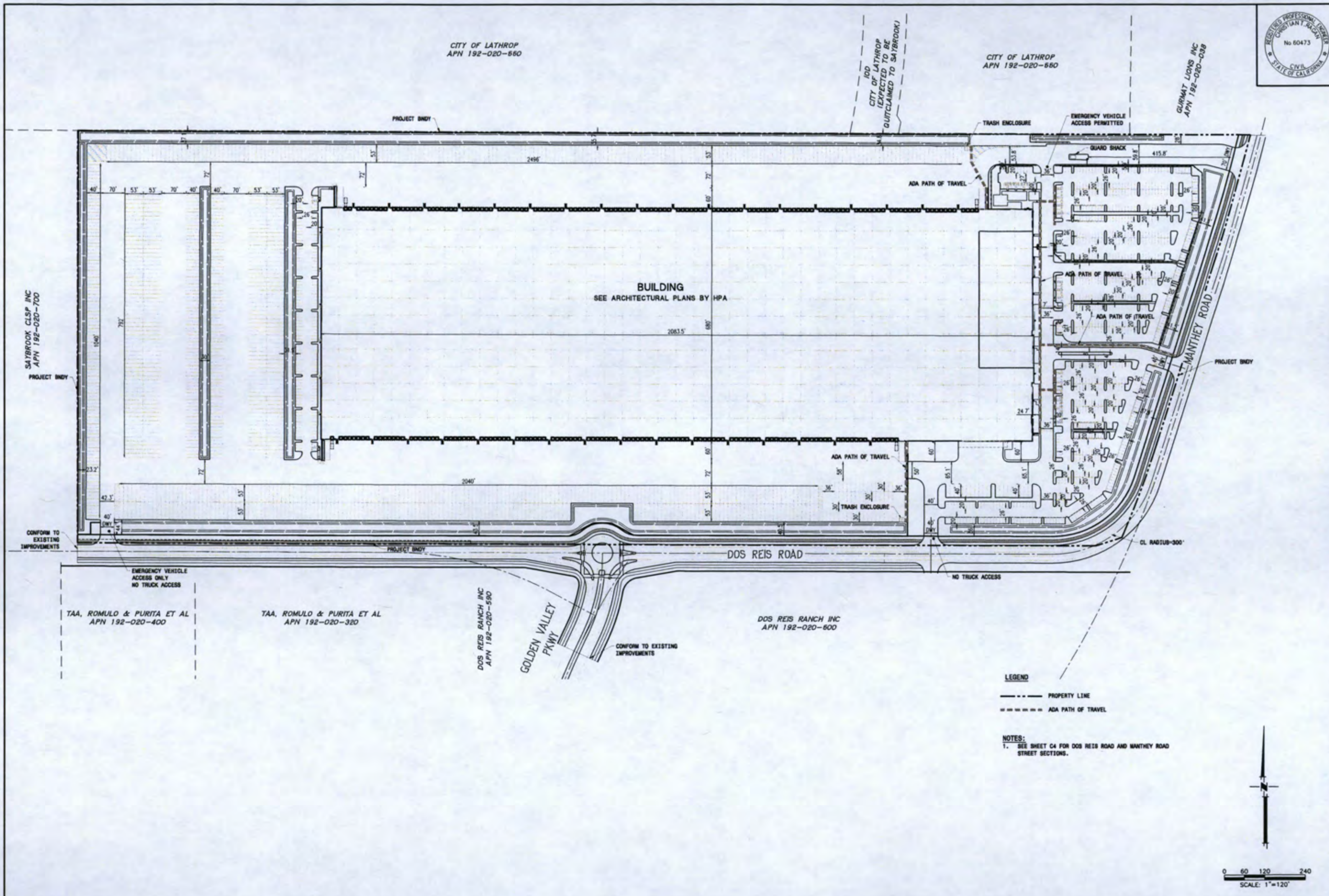
MacKAY & SOMPS
ENGINEERS PLANNERS SURVEYORS

PLANS PREPARED UNDER THE DIRECTION OF:
CHRISTIAN T. RAGAN RCE # C60473

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
BOUNDARY AND EXISTING CONDITIONS
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

PROJECT NO. 25244.000.P

SHT C-2 OF 10



DATE MAY 2023
SCALE 1" = 120'
DRAWN BY GC/AB
DESIGNED BY JB
CHECKED BY CTR

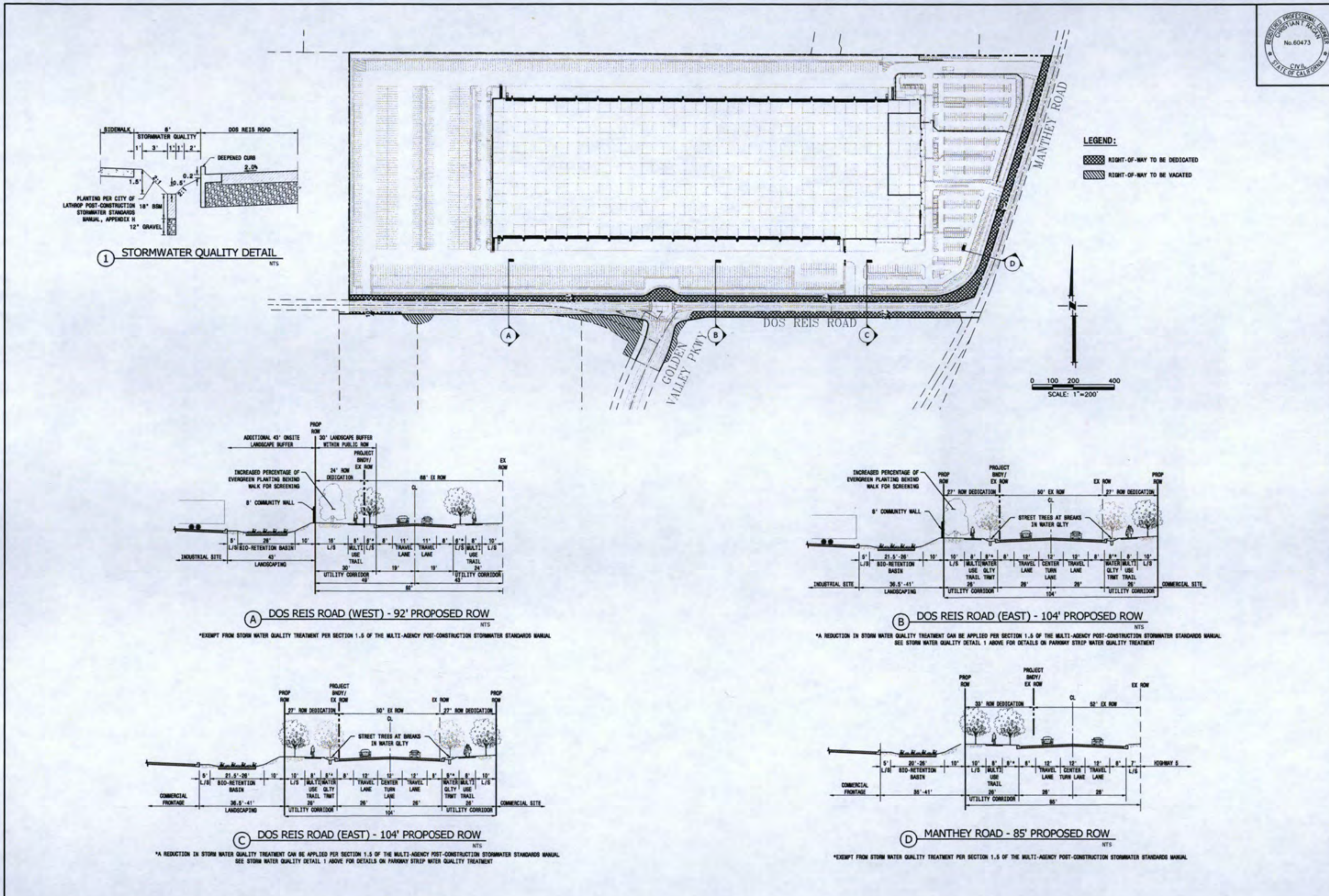
MacKAY & SOMPS

PLANS PREPARED UNDER THE DIRECTION OF:
CHRISTIAN T. RAGAN RCE # C60473

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
HORIZONTAL CONTROL PLAN
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

PROJECT NO 25244.000.P

SHT C-3 OF 10



CHRISTIAN T. RAGAN No. 60473 CIVIL STATE OF CALIFORNIA

DATE: MAY 2023
SCALE: N.T.S.
DRAWN BY: DC/MB
DESIGNED BY: JB
CHECKED BY: CTR

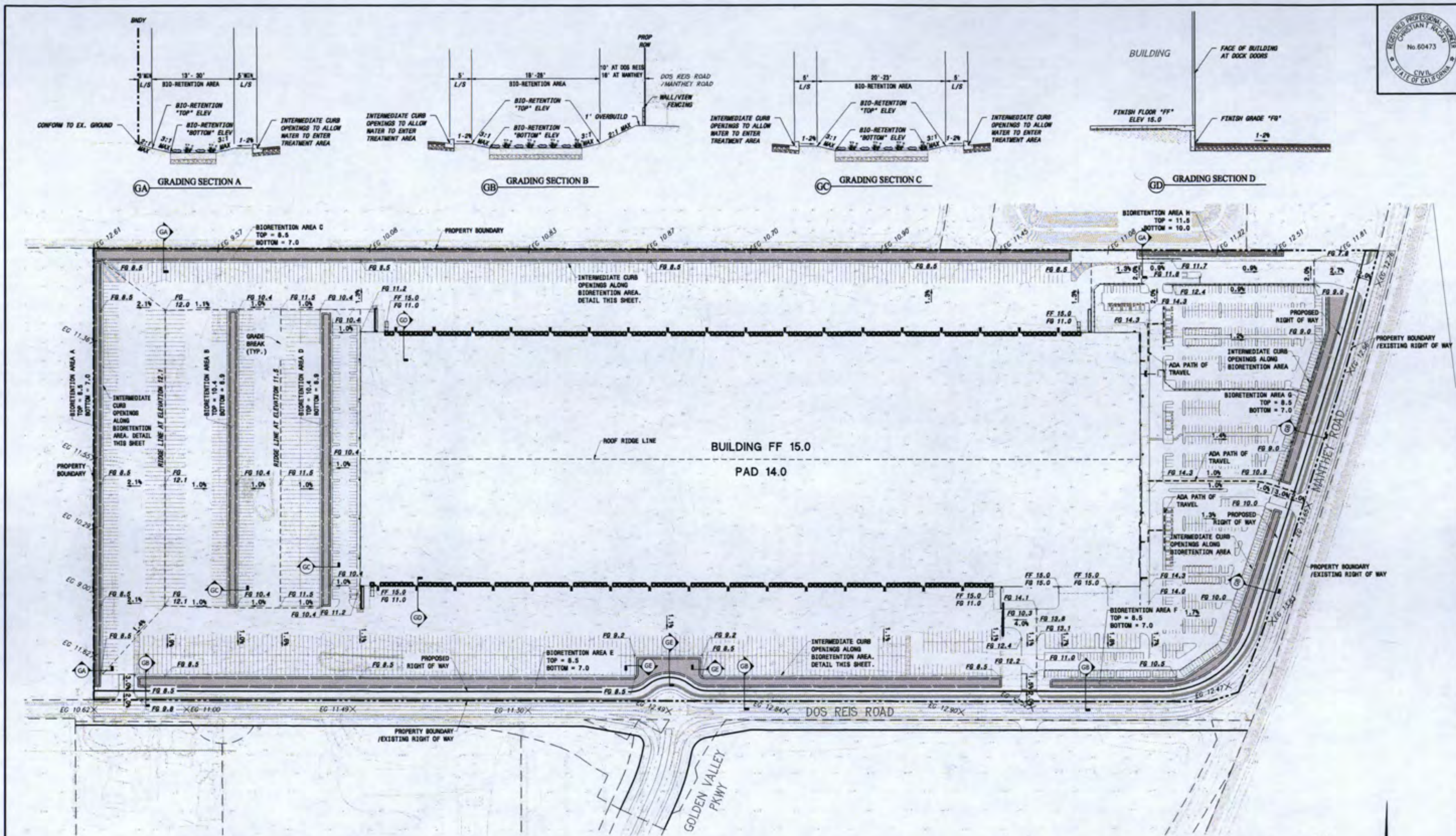
MACKAY & SOMPS

PLANS PREPARED UNDER THE DIRECTION OF:
CHRISTIAN T. RAGAN RCE # C60473

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
RIGHT-OF-WAY DEDICATION & PUBLIC STREET SECTIONS
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

PROJECT NO. 25244.000.P

SHT C-4 OF 10



EARTHWORK ASSUMPTIONS:

- BUILDING PAD SET 1.00 FT BELOW FINISHED FLOOR (8"PCC / 4"AB)
- TRUCK LOADING DOCKS, TRAVELWAYS (5.5"AB / 15" AB = 20.5" (1.71'))
- TRAILER PARKING AREA (4"AC / 11" AB = 15" (1.25'))
- AUTO TRAVELWAYS AND PARKING SPACES (3"AC / 7"AB = 10" (0.83'))

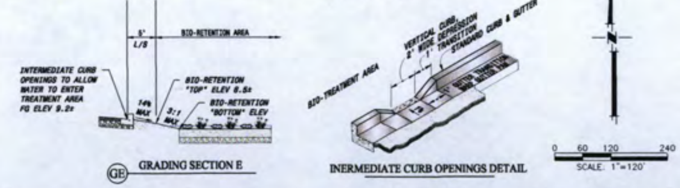
EARTHWORK SUMMARY

AREA	ESTIMATED CUT (CY)	ESTIMATED FILL (CY)
RAW COMPUTER RESULTS	130,000	280,000
STRIPPING	TBD	
SHRINKAGE	TBD	
CONSOLIDATION	TBD	
TRENCH SPOILS	TBD	
TOTALS	130,000	280,000
	IMPORT 150,000 CY	

THE PRELIMINARY EARTHWORK VOLUME IS AN APPROXIMATE CALCULATED QUANTITY BASED ON THE DIFFERENCES BETWEEN EXISTING GROUND ELEVATIONS AND ROUGH GRADE ELEVATIONS. FOR THIS REASON AND BECAUSE OF VARIABLES SUCH AS COMPACTION, SHRINKAGE AND THE CONTRACTOR'S METHOD OF OPERATION, THE VOLUME OF DIRT MOVED IN THE FIELD WILL IN ALL LIKELIHOOD DEVIATE TO SOME EXTENT FROM THE CALCULATED VOLUME.

LEGEND:

- PROJECT BOUNDARY
- GREAT BREAK / RIDGE LINE
- BIORETENTION AREA
- ADA PATH OF TRAVEL



ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
PRELIMINARY GRADING AND DRAINAGE PLAN
CITY OF LATHROP · SAN JOAQUIN COUNTY · CALIFORNIA

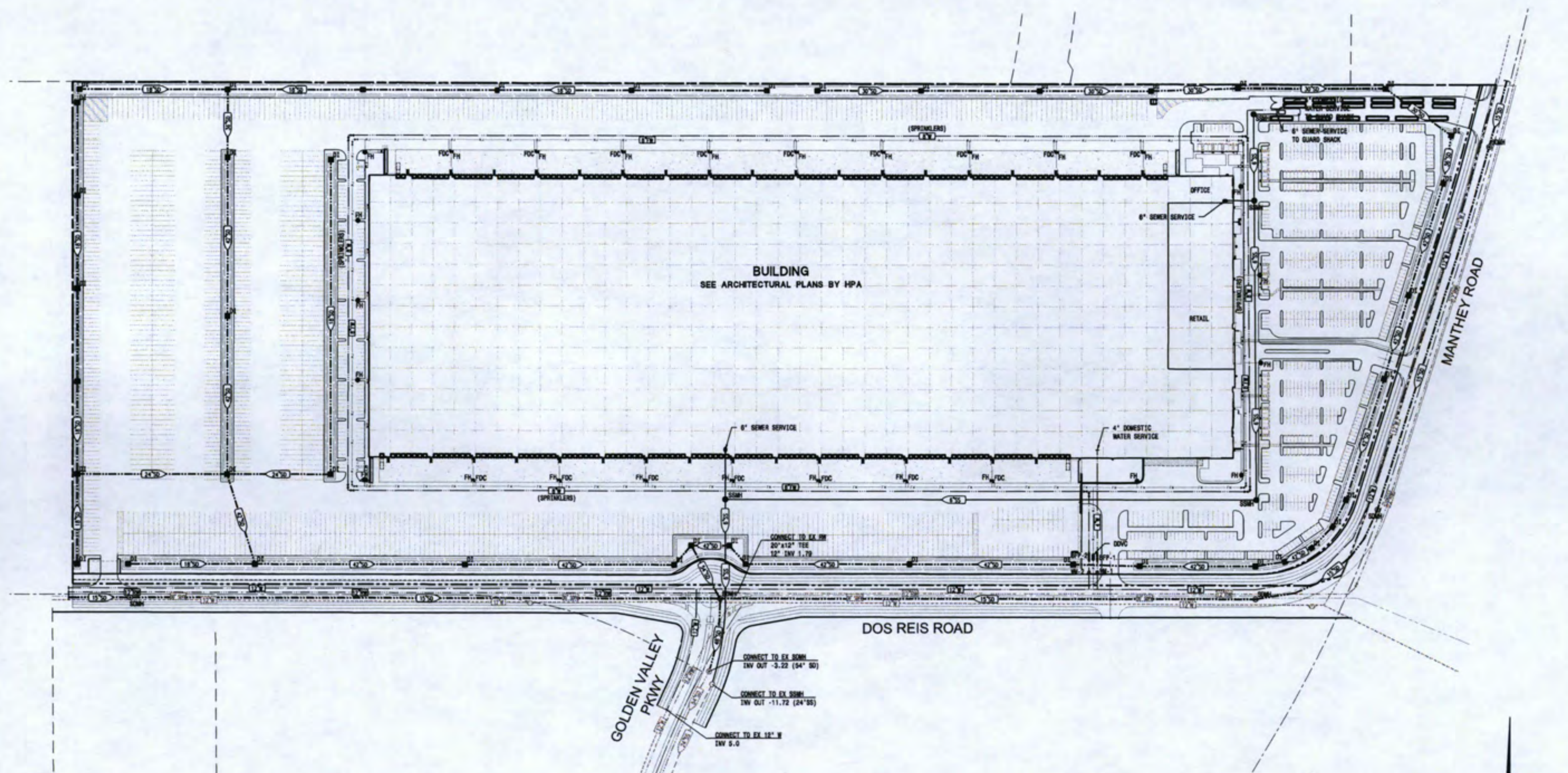
PLANS PREPARED UNDER THE DIRECTION OF: CHRISTIAN T. RAGAN RCE # C60473

MacKay & Somps

DATE: MAY 2023 · SCALE: 1"=120' · DRAWN BY: OC/HB · DESIGNED BY: JB · CHECKED BY: CTR

PROJECT NO. 25244.000.P

SHT C-5 OF 10



NOTES:

1. SEE SHEET C-7 "STORMWATER QUALITY PLAN" FOR SIZING OF BIO-RETENTION AREAS.
2. FIRE HYDRANT LOCATIONS ARE PRELIMINARY AND SHALL BE VERIFIED BY FIRE PROTECTION SPECIALIST

0 60 120 240
SCALE: 1"=120'

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
PRELIMINARY UTILITY PLAN
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

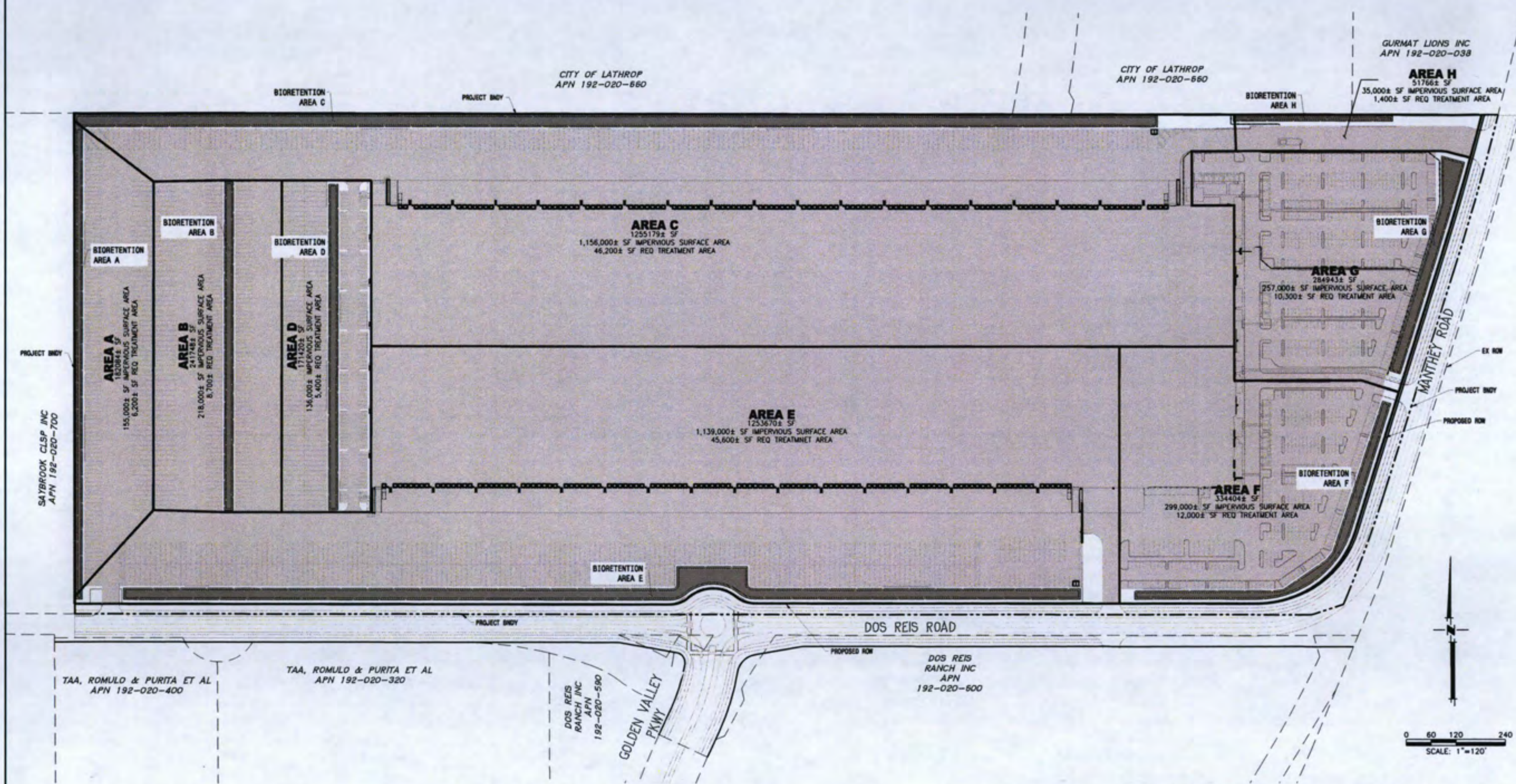
PLANS PREPARED UNDER THE DIRECTION OF:
CHRISTIAN T. RAGAN RCE # C60473

MacKAY & SOMPS
ENGINEERS PLANNERS SURVEYORS

DATE: MAY 2023
SCALE: 1"=120'
DRAWN BY: DC / MB
DESIGNED BY: JB
CHECKED BY: CTR

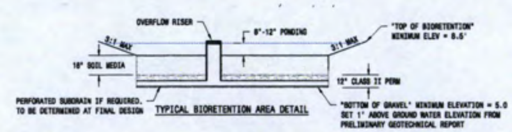
NO.	REVISION	DATE

PROJECT NO. 25244.000.P
SHT C-6 OF 10



STORM WATER QUALITY CALCULATIONS

AREA DESIGNATION	TOTAL AREA (SF)	TOTAL IMPERVIOUS AREA (SF)	REQUIRED TREATMENT AREA (SF)	PROVIDED TREATMENT AREA (SF)
AREA A	182084	155000	6200	6500
AREA B	241748	218000	8700	9000
AREA C	1255179	1156000	46200	46500
AREA D	171420	136000	5400	5600
AREA E	1253670	1139000	45600	46000
AREA F	334404	299000	12000	12000
AREA G	284943	257000	10300	11000
AREA H	51766	35000	1400	1600



TYPICAL BIORETENTION AREA DETAIL

LEGEND:

- DRAINAGE MANAGEMENT AREA BOUNDARY
- PROJECT BOUNDARY
- IMPERVIOUS AREA
- BIORETENTION TREATMENT AREA

NOTES:

1. STORMWATER QUALITY BIO-RETENTION AREAS SIZED AT 4% OF THE DRAINAGE MANAGEMENT AREAS IMPERVIOUS SURFACE AREA.
2. SOME SMALLER LANDSCAPE AREAS ONSITE HAVE BEEN QUANTIFIED AS "IMPERVIOUS" AT THIS TIME TO REMAIN CONSERVATIVE AND TO ENSURE THE SITE PLAN ALLOWS FOR ADEQUATE TREATMENT. FINAL CALCULATION WILL BE COMPLETED AT FINAL DESIGN.

REGISTERED PROFESSIONAL ENGINEER CHRISTIAN T. RAGAN No.60473 CIVIL STATE OF CALIFORNIA

NO.	REVISION	DATE

DATE: MAY 2023
SCALE: 1"=120
DRAWN BY: DC/MB
DESIGNED BY: JB
CHECKED BY: CTR

MacKAY & SOMPS

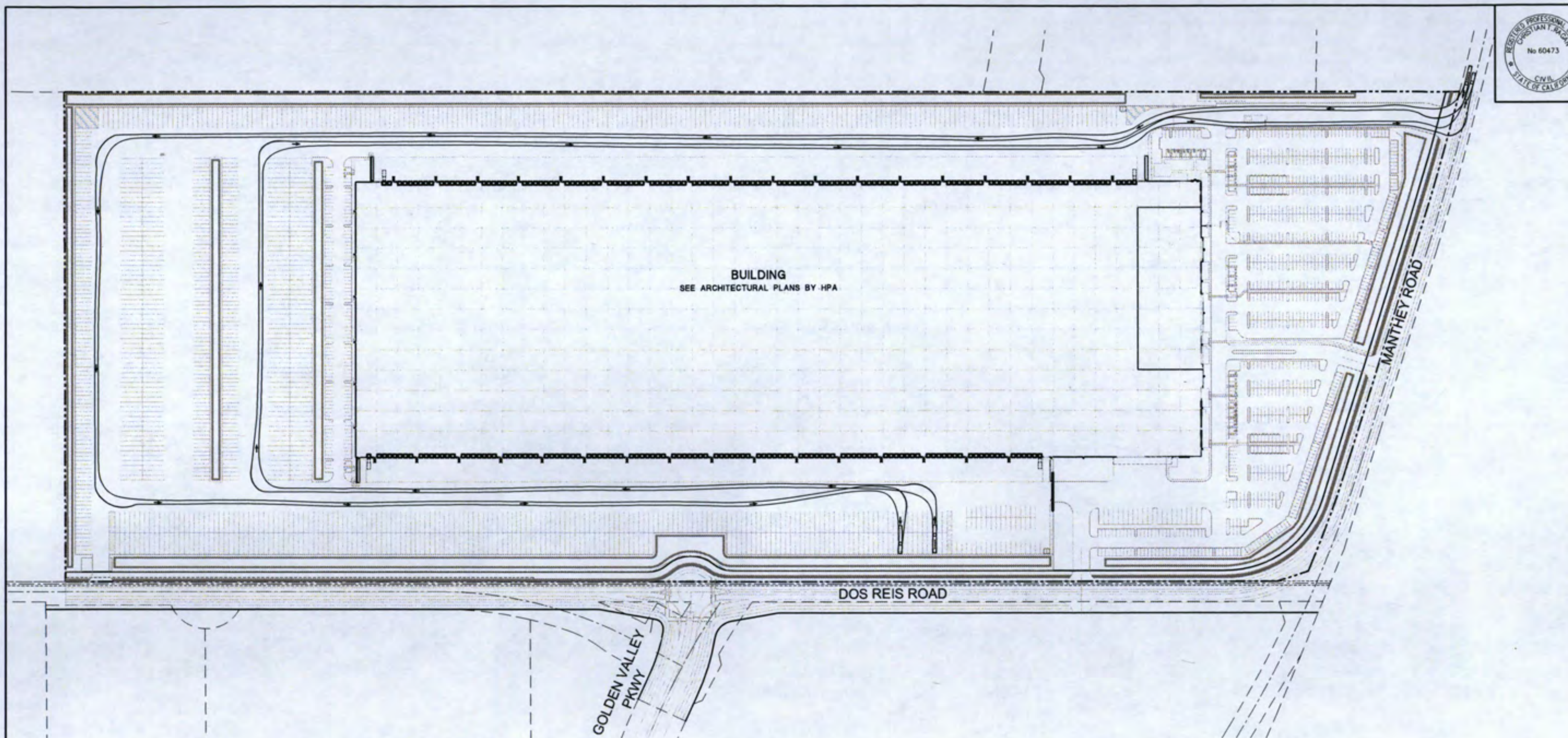
PLANS PREPARED UNDER THE DIRECTION OF: CHRISTIAN T. RAGAN RCE # C60473

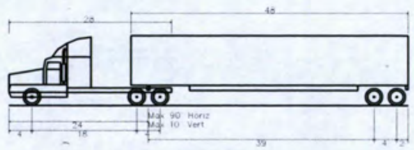
ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD

SITE PLAN REVIEW
PRELIMINARY STORMWATER QUALITY PLAN
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

PROJECT NO. 25244.000.P

SHT C-7 OF 10

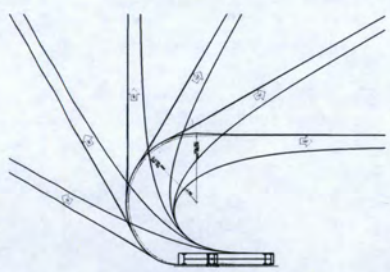




STAA Standard Design Vehicle

Overall Length	69.000ft
Overall Width	8.500ft
Overall Body Height	12.227ft
Min Body Ground Clearance	1.422ft
Track Width	8.500ft
Lock-to-lock time	6.00s
Max Steering Angle (Virtual)	26.30°

STAA SEMI-TRUCK PROFILE



STAA SEMI-TRUCK TEMPLATE

SCALE: 1"=120'

REGISTERED PROFESSIONAL ENGINEER
CHRISTIAN T. RAGAN
No 60473
CIVIL
STATE OF CALIFORNIA

DATE: MAY 2023
SCALE: AS SHOWN
DRAWN BY: DG
DESIGNED BY: JB
CHECKED BY: CTR

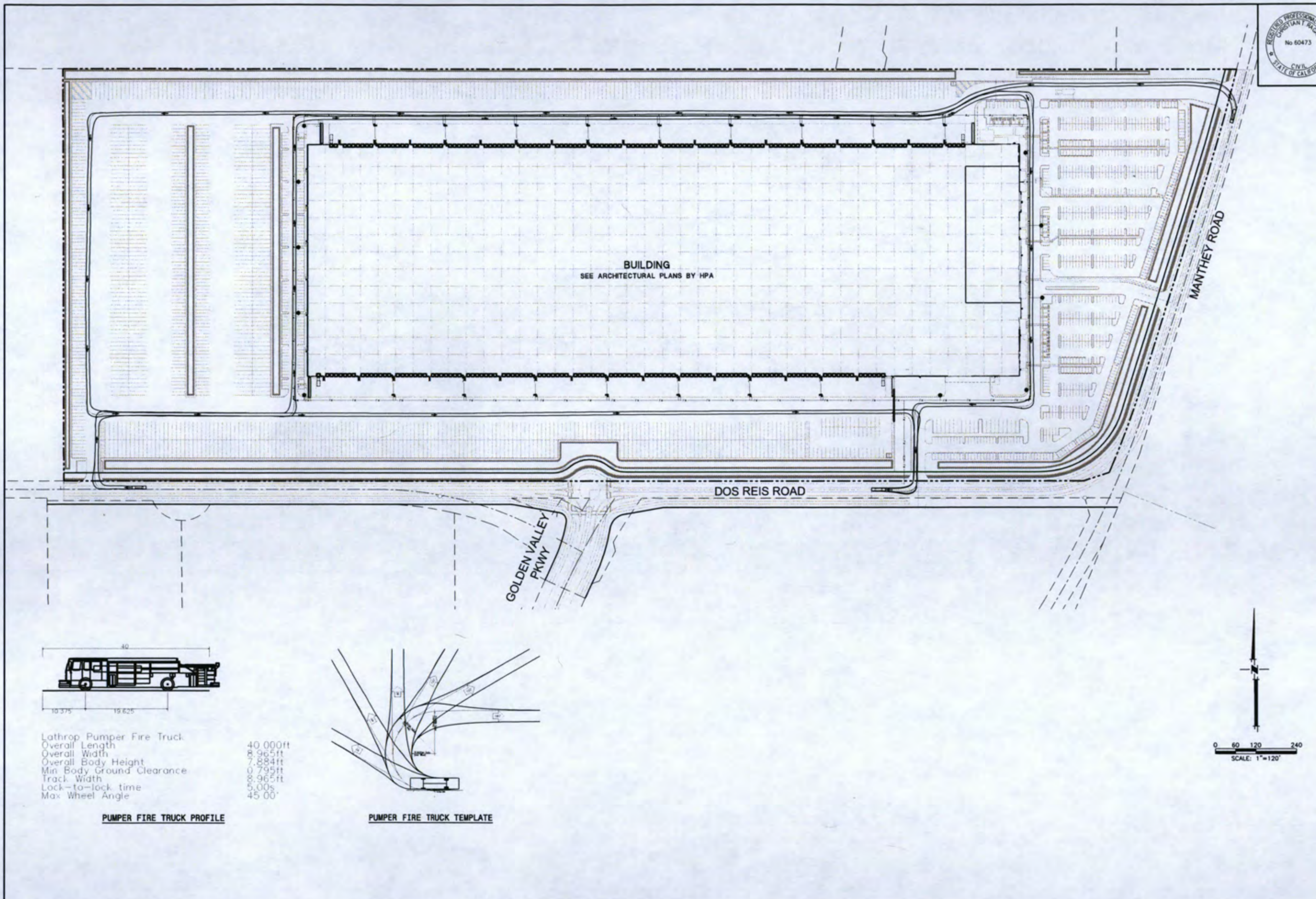
MacKAY & SOMPS

PLANS PREPARED UNDER THE DIRECTION OF:
CHRISTIAN T. RAGAN RCE # C60473

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
STAA TRUCK ACCESS PLAN
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

PROJECT NO
25244.000.P

SHT
C-8
OF 10



REGISTERED PROFESSIONAL ENGINEER
CHRISTIAN T. RAGAN
No 60473
CIVIL
STATE OF CALIFORNIA

NO.	REVISION	DATE

DATE: MAY 2023
SCALE: 1"=120'
DRAWN BY: DG
DESIGNED BY: JB
CHECKED BY: CTR

MacKAY & SOMPS

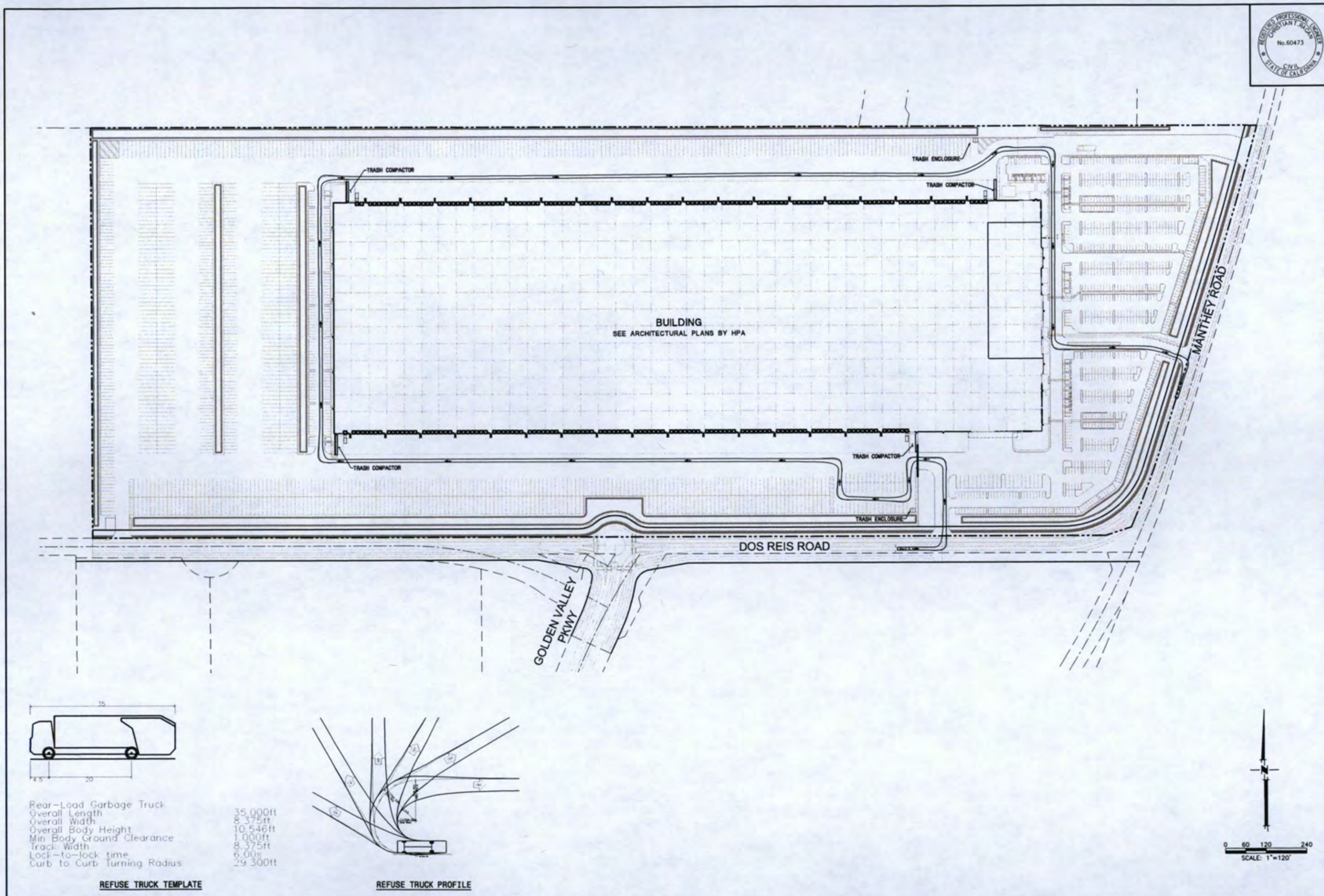
PLANS PREPARED UNDER THE DIRECTION OF:
CHRISTIAN T. RAGAN RCE # C60473

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD

SITE PLAN REVIEW
FIRE TRUCK ACCESS PLAN
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

PROJECT NO. 25244.000.P

SHT C-9 OF 10



DATE: MAY 2023
SCALE: AS SHOWN
DRAWN BY: OG
DESIGNED BY: JB
CHECKED BY: CTR

MacKAY & SOMPS

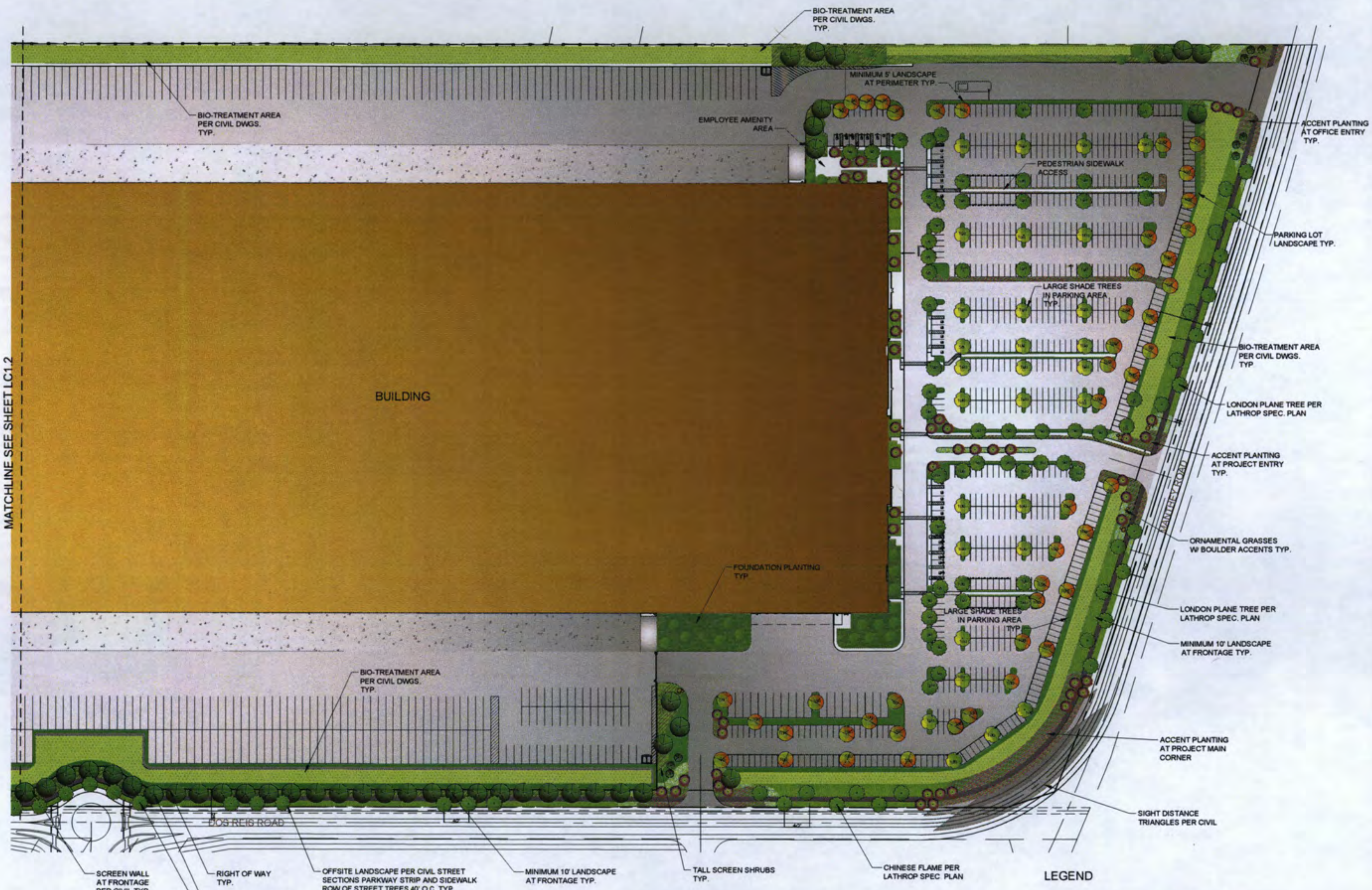
PLANS PREPARED UNDER THE DIRECTION OF:
CHRISTIAN T. RAGAN RCE # C60473

ASHLEY FURNITURE - DOS REIS & MANTHEY ROAD
SITE PLAN REVIEW
REFUSE TRUCK ACCESS PLAN
CITY OF LATHROP SAN JOAQUIN COUNTY CALIFORNIA

PROJECT NO 25244.000.P

SHT C-10 OF 10

ATTACHMENT " 8 "



DOS REIS ROAD PROPOSED TREE SPECIES

MIXTURE OF DECIDUOUS SHADE TREES AND LARGE EVERGREEN TREES FOR SCREENING

- DEODAR CEDAR
- CHINESE FLAME TREE (DOS REIS RD) LONDON PLANE TREE (MANTHEY)

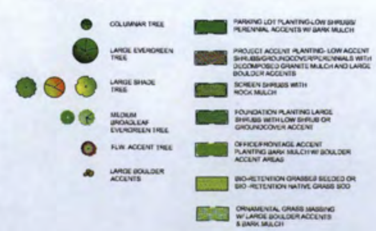
CONCEPTUAL LANDSCAPE PLAN

SCALE: 1" = 60'-0"

LANDSCAPE CALCULATIONS:

TOTAL SITE AREA =3,746,184 S.F (86 AC)
SITE AREA LANDSCAPE REQUIRED = 374,618 S.F (10%)
SITE AREA LANDSCAPE PROVIDED = 388,749 S.F (10.4%) (NOT INC. BASINS)
(282,347 S.F. ONSITE, 106,402 S.F. RIGHT OF WAY)
(STORMWATER RETENTION BASINS AREA -234,729 S.F)
NO. OF STANDARD PARKING SPACES = 960
PARKING AREA 227,931 SF
REQUIRED PARKING AREA SHADE = 113,966 S.F. (MIN. 50% OF PARKING AREA)
PARKING AREA SHADE PROVIDED AT MATURITY = 165,896 S.F (73%)
104 TREES @ 100% 40' DIAMETER (1257 S.F) = 130,728 S.F
56 TREES @ 50% 40' DIAMETER (628 S.F) = 35,168 S.F
TREES REQUIRED = 160 (1/6 SPACES)
TREES PROVIDED = 160
LANDSCAPE PLACEMENT REQUIRED
PERIMETER MINIMUM 5' (PROVIDED)
STREET FRONTAGE MINIMUM 10' (PROVIDED)
PARKING PERIMETER MINIMUM 5' (PROVIDED)
STREET TREES REQUIRED: 1/40 L.F. (PROVIDED)

LEGEND



HPA architecture

hpa, inc.
18831 bardeen avenue - ste. #100 irvine, ca 92612
tel: 949-863-1770
email: hpa@hparchs.com

GreenDesign
Landscape Architects, Inc.
1464 Popinjay Drive
Reno, NV.
p: 775 829 1364
email: bhatch00@charter.net

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

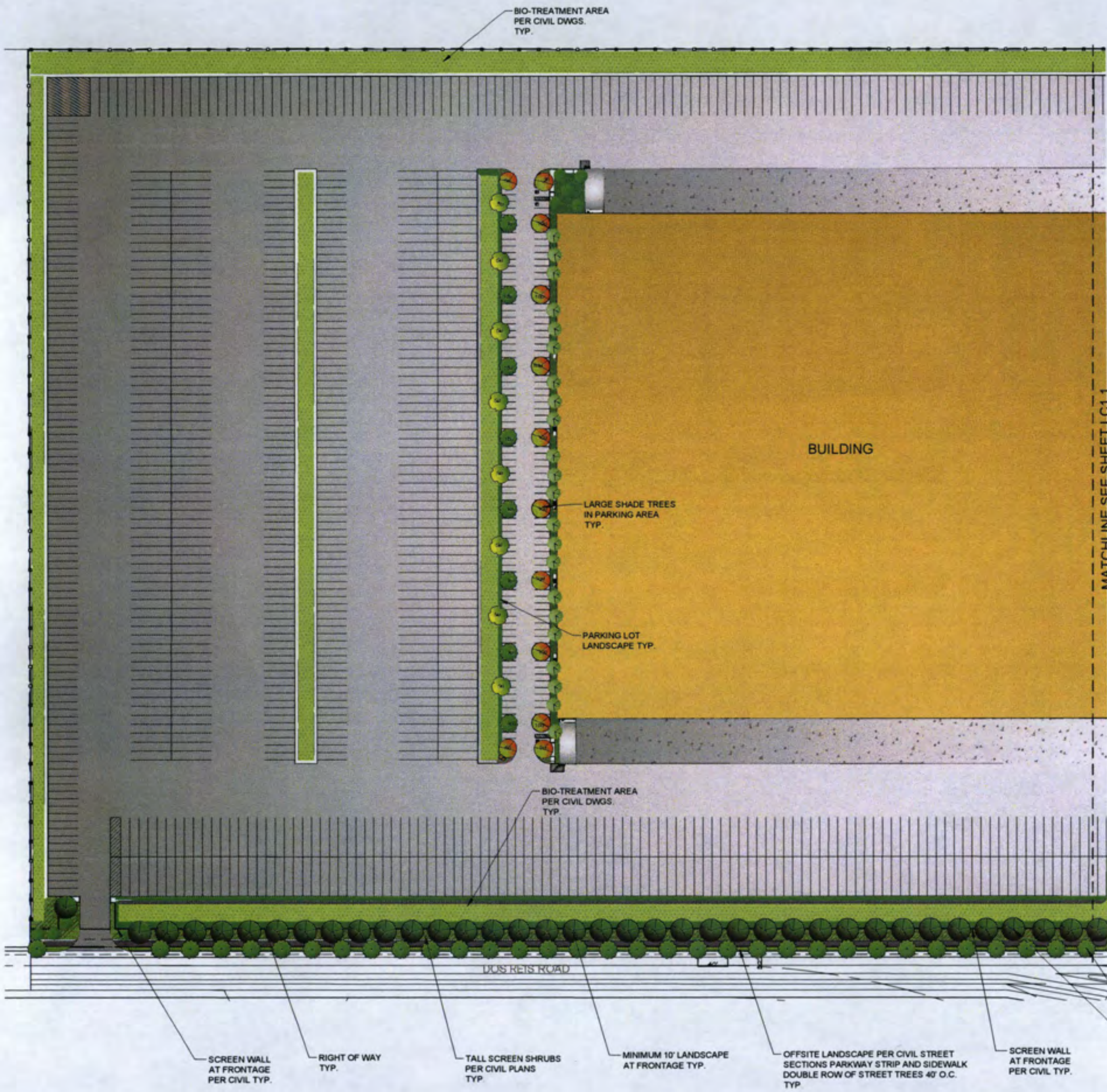
Civil:	K+W
Structural:	-
Mechanical:	-
Plumbing:	-
Electrical:	-
Landscape:	GREEN DESIGN
Fire Protection:	-
Soils Engineer:	-

Title:
CONCEPTUAL LANDSCAPE PLAN

Project Number:	21290
Drawn by:	BH
Date:	06/30/21

Revision
REVISED 12-20-22
REVISED 12-21-22
REVISED 03-31-23
REVISED 04-17-23

Sheet:
LC1.1



CONCEPTUAL LANDSCAPE PLAN

SCALE: 1" = 60'-0"

PRELIMINARY PLANT LIST

BOTANICAL NAME	COMMON NAME	SIZE	WATER REGIME Very Low (VL)-Native LOW (L)-Climate Adapted	MATURE HABIT H X W
TREES				
CEDRUS DEODARA	DEODAR CEDAR	24" BOX	L	60' X 40'
QUERCUS C. 'CRIMSON SPIRE'	COLUMNAR RED OAK	24" BOX	L	50' X 15'
OLEA EUROPAEA 'SWAN HILL'	FRUITLESS OLIVE	24" BOX	L	25' X 25' STANDARD TRUNK
PISTACIA C. 'KEITH DAVEY'	CHINESE PISTACHE	24" BOX	L	50' X 40'
ULMUS 'FRONTIER'	FRONTIER ELM	24" BOX	L	50' X 40'
LAGERSTROEMIA 'TUSCARORA'	CRAPE MYRTLE	24" BOX	L	15' X 15'
JUNIPERUS C. 'WICHITA BLUE'	COLUMNAR JUNIPER	15 GAL.	L	15' X 5'
PLATANUS X A. 'BLOODGOOD'	LONDON PLANE TREE	24" BOX	M	65' X 65'
KOELREUTERIA BIPINNATA	CHINESE FLAME TREE	24" BOX	M	40' X 40'
PLATANUS A. 'YARWOOD'	CHINESE FLAME	24" BOX	L	50' X 40'
EVERGREEN SCREENING SHRUBS				
RHUS OVATA	SUGAR BUSH	5 GAL.	VL	8' X 10'
ARCTOSTAPHYLOS 'HOWARD MCMINN'	MANZANITA	5 GAL.	L	6' X 6'
DODONEA VISCOSA	HOP BUSH	5 GAL.	L	8' X 10'
ARBUTUS 'OKTOBERFEST'	DW. STRAWBERRY	5 GAL.	L	5' X 5'
ACACIA SPECIES	ACACIA	5 GAL.	L	VARIES
CEANOTHUS 'RAY HARTMAN'	CA. LILAC	5 GAL.	L	8' X 8'
GRASSES OR GRASS LIKE				
FESTUCA MAIREI	ATLAS FESCUE	1 GAL.	L	2' X 3'
PENNISETUM O. 'KARLEY ROSE'	FOUNTAIN GRASS	1 GAL.	L	3' X 3'
FESTUCA CALIF. 'SERPENTINE BLUE'	CALIF. FESCUE	1 GAL.	L	3' X 3'
CALAMAGROSTIS A. 'KARL FOESTER'	FEATHERREED	1 GAL.	L	2' X 3'
LOMANDRA LONGIFOLIA 'BREEZE'	BREEZE MAT RUSH	1 GAL.	L	3' X 3'
DROUGHT TOLERANT SHRUBS				
LANTANA M. 'DW. YELLOW'	DW. LANTANA	5 GAL.	L	2' X 4'
RHAMNUS C. 'MOUND SAN BRUNO'	COFFEEBERRY	5 GAL.	VL	6' X 6'
NERIUM OLEANDER 'PETITE SALMON'	PETITE OLEANDER	5 GAL.	L	5' X 5'
BERBERIS SPECIES	BARBERRY	5 GAL.	L	4' X 4'
ROSMARINUS O. 'TUSCAN BLUE'	UPRIGHT ROSEMARY	5 GAL.	L	4' X 4'
CEANOTHUS 'JOYCE COULTER'	WILD LILAC	1 GAL.	L	2' X 6'
HESPERALOE PARVIFLORA	RED YUCCA	5 GAL.	L	3' X 4'
WESTRINGIA	COAST ROSEMARY	5 GAL.	L	3' X 3'
OLEA 'LITTLE OLLIE'	DW. OLIVE	5 GAL.	L	4' X 5'
CALLISTEMON 'LITTLE JOHN'	DW. BOTTLE BRUSH	5 GAL.	L	3' X 4'
AGAVE SPP.	AGAVE	5 GAL.	L	VARIES
PERENNIALS				
TULBAGHIA V. 'TRICOLOR'	SOCIETY GARLIC	1 GAL.	L	18" X 18"
DIETES V. 'VARIEGATA'	FORT NIGHT LILY	1 GAL.	L	3' X 3'
ACHILLEA 'MOONSHINE'	YARROW	1 GAL.	VL	3' X 3'
NEPATA 'WALKER LOW'	CATMINT	1 GAL.	VL	1' X 3'

PROPOSED MULCHES (NOT SHOWN)

3" MINIMUM DEPTH OF DECOMPOSED GRANITE AS AVAILABLE FROM A LOCAL SOURCE. PLACE OVER DEWITT PRO 5 LANDSCAPE FABRIC. TREAT WITH A PRE-EMERGENT HERBICIDE PRIOR TO PLACING FABRIC. INSTALL FABRIC PER MFG. DIRECTION. RAKE SMOOTH AND WATER IN TO COMPACT. PLACE BARK PER LEGEND IN PLANT BASINS.

BARK MULCH-PLANTERS AREAS AS SHOWN FOR GROUNDCOVER CHIPPED OR SHREDDED WOOD FIR WASTE MULCH - PLACE 3" MIN. DEPTH WOOD WASTE FROM A LOCAL PRODUCER. 3/4"- 1" DIA. COLOR DARK BROWN W/ NO VISIBLE CONTAMINANTS PLACE 3" MIN. DEPTH OF BARK IN ALL PLANT BASINS IN ROCK MULCH AREAS.

2'-4' DIA. FRACTURED ROCK BOULDERS. BOULDER COLOR AND TEXTURE TO BLEND WITH GRAY ROCK MULCH. BURY BOULDER BY ⅓ IN SOIL AND OR DG. MULCH. REFER TO DETAIL SHEET SHEET L3.1

3" MINIMUM DEPTH OF 3"-8" GRAY TO TAN COBBLE ROCK AS AVAILABLE FROM LOCAL SOURCE. PLACE OVER DEWITT PRO 5 LANDSCAPE FABRIC. TREAT WITH A PRE-EMERGENT HERBICIDE PRIOR TO PLACING FABRIC. INSTALL FABRIC PER MFG.DIRECTION. PLACE BARK PER LEGEND IN PLANT BASINS.

PLANTER MULCH - ALL PLANTERS NOT OTHERWISE DESIGNATED FOR ROCK, BARK OR SEED 3" MINIMUM DEPTH OF 8" COBBLE GRAY TO TAN AS AVAILABLE FROM SOURCE. PLACE OVER DEWITT PRO 5 LANDSCAPE FABRIC. TREAT WITH A PRE-EMERGENT HERBICIDE PRIOR TO PLACING FABRIC. INSTALL FABRIC PER MFG.DIRECTION. PLACE BARK PER LEGEND IN PLANT BASINS.

SAMPLES OF MULCH SHALL BE SUBMITTED TO THE OWNER FOR APPROVAL PRIOR TO DELIVERY TO THE SITE. MULCH SHALL BE A MIN. OF 4" DEPTH IN ALL PLANTER AREAS.

THE LANDSCAPE CONTRACTOR SHALL FIELD PLACE PLANTS AROUND ABOVE GROUND UTILITIES TO SCREEN UTILITIES FROM PUBLIC STREETS AND PARKING AREAS AFTER PLACEMENT AND CONSTRUCTION OF UTILITY PLANTINGS PER PLAN SHALL BE UTILIZED. PLANTS MAY BE RE-SPACED IN VICINITY OF UTILITY TO ACCOMODATE SCREENING. CONTACT LANDSCAPE ARCHITECT IF PLANTING REQUIRES CLARIFICATION.

HPA architecture

hpa, inc.
18831 bardeen avenue - ste. #100 irvine, ca 92612
tel: 949-863-1770
email: hpa@hparchs.com

GreenDesign
Landscape Architects, Inc.
1464 Popinjay Drive
Reno, NV.
p: 775 829 1364
email: bhatch00@charter.net

OWNER
ASHLEY FURNITURE INDUSTRIES, INC

hodgdon group
OWNER'S REPRESENTATIVE

Project:
ASHLEY LATHROP
INT. DOS RIOS RD. & MANTHEY RD.
LATHROP, CA 95330

Consultants:

Civil:	K+W
Structural:	-
Mechanical:	-
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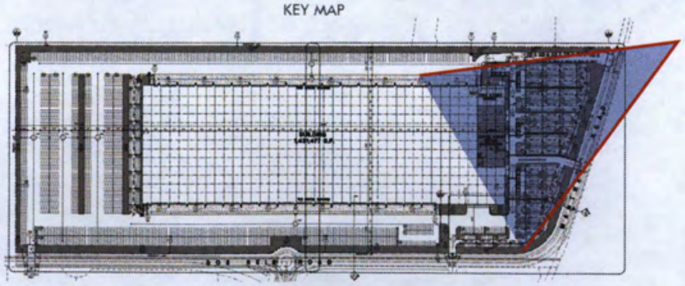
LC1.2

ATTACHMENT " 9 "

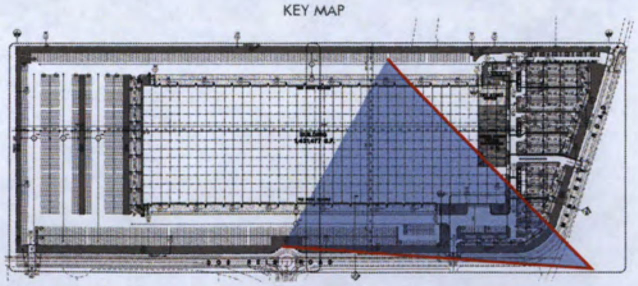
KEY MAP



LATHROP, CA
ASHLEY LATHROP
Perspective View at Manthey Rd. 1

ASHLEY® FURNITURE INDUSTRIES, INC.

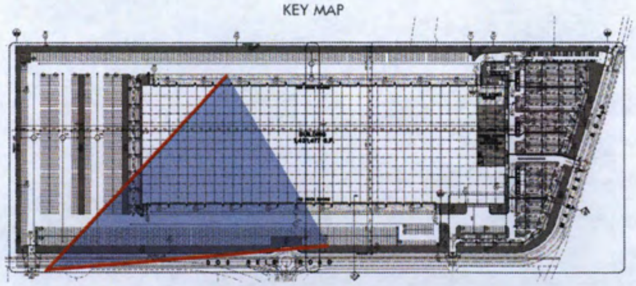
KEY MAP



LATHROP, CA
ASHLEY LATHROP
Perspective View at Manthey Rd. & Dos Reis Rd.

ASHLEY FURNITURE INDUSTRIES, INC.

KEY MAP



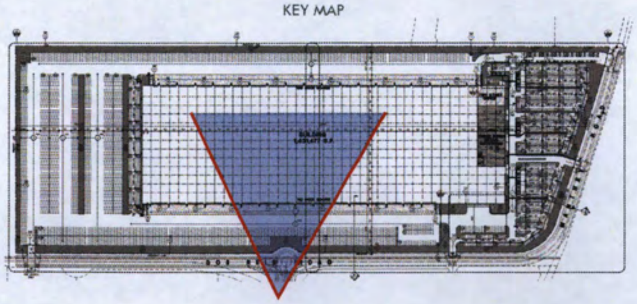
LATHROP, CA

ASHLEY LATHROP

Perspective View Dos Reis Rd. 1

ASHLEY FURNITURE INDUSTRIES, INC.

KEY MAP



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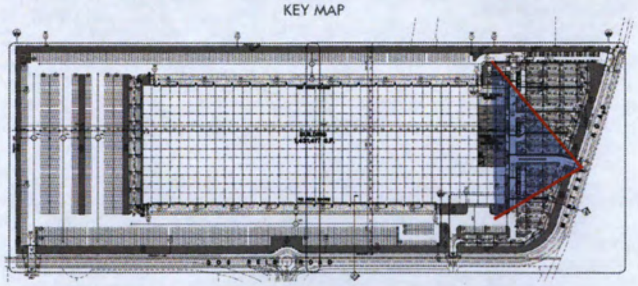
LATHROP, CA

ASHLEY LATHROP

Perspective View at Dos Reis Rd. 2

ASHLEY® FURNITURE INDUSTRIES, INC.

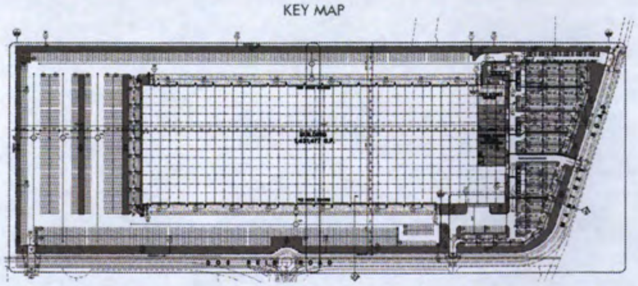
KEY MAP



LATHROP, CA
ASHLEY LATHROP
Perspective View at Manthey Rd. 2

ASHLEY® FURNITURE INDUSTRIES, INC.

KEY MAP



LATHROP, CA

ASHLEY LATHROP

Aerial View - South Perspective

ASHLEY® FURNITURE INDUSTRIES, INC.

Attachment 10

Ashley Furniture Project CUP-23-08 and SPR-23-09

Environmental Checklist, prepared by De Novo Planning Group, dated August, 2023

Due to the size of this document, it has not been reproduced in the staff report. A copy of the Environmental Checklist is available for viewing and download on the City's website at the following links:

Environmental Checklist without Appendices:
https://www.ci.lathrop.ca.us/sites/default/files/fileattachments/community_development/page/5622/lathrop_ashley_warehouse_15183_no_appendices.pdf

Environmental Checklist with Appendices:
https://www.ci.lathrop.ca.us/sites/default/files/fileattachments/community_development/page/5622/lathrop_ashley_warehouse_15183_clean.pdf

The Environmental Checklist can also be viewed at the following link:
https://www.ci.lathrop.ca.us/com-dev/page/public-review-documents

Individuals that are unable to access the Environmental Checklist at the website listed above or would require a computer disk or thumb drive containing a copy of the document should contact Planning Staff at planning@ci.lathrop.ca.us or (209) 941-7290 to obtain a copy.

CITY OF LATHROP
PLANNING COMMISSION RESOLUTION NO. 23-13

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF LATHROP RECOMMENDING THE CITY COUNCIL FIND THE PROJECT EXEMPT FROM FURTHER ENVIRONMENTAL REVIEW PURSUANT TO PUBLIC RESOURCES CODE SECTION 21083.3 AND CEQA GUIDELINES SECTION 15183 AND APPROVE THE CONDITIONAL USE PERMIT AND THE SITE PLAN REVIEW FOR THE PROPOSED ASHLEY FURNITURE PROJECT (CUP-23-08 AND SPR-23-09)

WHEREAS, the City of Lathrop Planning Commission held a duly noticed public hearing to consider the Conditional Use Permit and Site Plan Review pursuant to the Lathrop Municipal Code; and

WHEREAS, the request is for approval of a Conditional Use Permit and Site Plan Review to allow the construction of an approximately 1.5 million square foot concrete tilt-up building and all necessary supporting infrastructure on property located within the Central Lathrop Specific Plan Phase 2 Amendment area as further defined below in the third recital (the proposed Project); and

WHEREAS, the property is located at 14101 S. Manthey Road (APN: 192-020-14) (the property); and

WHEREAS, prior to the City's approval of the 2022 General Plan Update, the City prepared an Environmental Impact Report (EIR) which analyzed the environmental impacts of buildout under the General Plan Update pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000, et seq.), and the City of Lathrop City Council certified the Final EIR on September 19, 2022 (State Clearinghouse # 2021100139); and

WHEREAS, the analysis in the General Plan Update EIR allows the use of CEQA exemption/streamlining provisions for projects developed under the General Plan Update, including the proposed Project; and

WHEREAS, an Environmental Checklist has been prepared for the proposed Project, which is attached to the Planning Commission Staff Report as Attachment 9 and can also be found in the Planning Division project files located at 390 Towne Centre Drive, Lathrop, CA 95330; and

WHEREAS, the Planning Commission finds that the proposed Project is consistent with the Limited Industrial land use goals and policies of the City of Lathrop General Plan and is also consistent with the development standards for the IL-CL, Limited Industrial Zoning District and the Central Lathrop Specific Plan Phase 2 Amendment as further implemented through the Zoning Code Text Amendment; and

WHEREAS, proper notice of this public meeting was given in all respects as required by law including the publishing of a legal notice of the hearing in the Manteca Bulletin on or about September 1, 2023, mailed the public notice to notify property owners located within a 300-foot radius from the project site boundary, emailed to the City's Public Hearing subscribers and interested parties and posted at three (3) locations accessible to the public and the City website; and

WHEREAS, the Planning Commission has reviewed all written evidence and oral testimony presented to date.

NOW, THEREFORE BE IT RESOLVED, the Planning Commission of the City of Lathrop does hereby make the following findings:

1. California Environmental Quality Act (CEQA) Findings. Pursuant to Public Resources Code section 21083.3 and CEQA Guidelines section 15183, the Planning Commission finds as follows:

    a. The project complies with CEQA based on the CEQA exemption/streamlining provisions contained in Public Resources Code section 21083.3 and CEQA Guidelines section 15183;

    b. Pursuant to the Planning Commission Staff Report and the attachments and exhibits thereto, including but not limited to, the CEQA Initial Study Checklist, which are incorporated herein by reference, the proposed Project will not result in any significant impacts that: 1) are peculiar to the project or project site; 2) were not identified as significant project-level, cumulative, or off-site effects in the General Plan Update EIR; or 3) were previously identified significant effects, which as a result of substantial new information that was not known at the time that the General Plan Update EIR was certified, are determined to have a more severe adverse impact than discussed in the General Plan Update EIR. As a result, pursuant to Public Resources Code section 21083.3 and CEQA Guidelines section 15183, the proposed Project is exempt from further environmental review under CEQA.

    c. All applicable General Plan Update policy and implementation actions and uniformly applied development policies, standards and/or regulations are, hereby imposed on the proposed Project and must be adhered to by the Project applicant. To the extent the City has not previously made findings regarding any/all of those referenced General Plan policy and implementation actions and uniformly applied development policies, standards and/or regulations, the Planning Commission hereby finds that all of those General Plan Update policy and implementation actions and uniformly applied development policies, standards and/or regulations, were adopted, in whole or in part, to substantially mitigate the potential environmental effects to which they pertain (i.e., aesthetics, agricultural and forest resources, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gases, climate change, and energy, hazards and hazardous materials, hydrology and water quality, land use, population, and housing, mineral resources noise, public services and recreation, circulation, utilities and services systems, and wildfire).

2. Conditional Use Permit Findings. Pursuant to Section 17.112.060 of the Lathrop Municipal Code (LMC), the Planning Commission finds as follows:

    a. That there are circumstances or conditions applicable to the land, structure or use which makes the granting of a use permit necessary for the preservation and enjoyment of a substantial property right.
    The proposed Project represents a major expansion of the existing Ashley Furniture Distribution Center and Retail Outlet located on S. Harlan Road. The proposed Project is consistent with the City's development standards for Limited Industrial.

    b. That the proposed location of the conditional use is in accordance with the objectives of the zoning code and the purposes of the district in which the site is located. *The proposed project is located in the IL-CL, Limited Industrial Zoning District and the Central Lathrop Specific Plan Phase 2 Amendment area and is a permitted use within the zoning district for which it is located as further established in the Zoning Code Text Amendment.*

    c. That the proposed use will comply with each of the applicable provisions of the LMC, as amended. *As noted above and as described in the Staff Report, the proposed project is a permitted use in the IL-CL, Limited Industrial Zoning District and is consistent with the applicable provisions in the LMC, including screening requirements pursuant to the Central Lathrop Specific Plan Phase 2 Amendment. Additionally, the General Plan required updates to the LMC and Central Lathrop Specific Plan Phase 2 in order to ensure that new development is compatible with existing development (Goal LU-5). The proposed project is consistent with the LMC, Policies and Implementation Actions of the General Plan as it relates to truck traffic impacts and land use compatibility.*

3. Site Plan Review Findings. Pursuant to Section 17.100.050 of the Lathrop Municipal Code (LMC), the Planning Commission finds as follows:

    a. The proposed Site Plan Review complies with all applicable provisions of Chapter 17.100;

    b. The proposed Site Plan Review is consistent with the site improvements listed in Chapter 17.100 (a. through i.) and improvements are such that traffic congestion is avoided and pedestrian and vehicular safety and welfare are protected and there will not be adverse effects on surrounding properties;

c. Proposed lighting for the project area is so arranged as to deflect away from adjoining properties; and

d. The proposed Site Plan Review is compatible with surrounding land uses and will not be detrimental to the health, safety and general welfare of the City as further evaluated in the Environmental Checklist.

BE IT FURTHER RESOLVED, based on substantial evidence in the administrative record of proceedings and pursuant to its independent review and consideration, the Lathrop Planning Commission does hereby recommend that the Lathrop City Council approve Conditional Use Permit No. CUP-23-08 and Site Plan Review No. SPR-23-09, subject to the Conditions of Approval listed in Attachment 2 of the September 13, 2023 Staff Report and incorporated by reference herein.

PASSED AND ADOPTED by the Planning Commission of the City of Lathrop at a Special meeting on the 13th day of September, 2023 by the following vote:

AYES: Ishihara, Camarena, Jackson, Rhodes

NOES: None

ABSTAIN: None

ABSENT: Ralmilay

Tosh Ishihara, Chair

ATTEST:

Rick Caguiat, Secretary

APPROVED AS TO FORM:

Salvador Navarrete, City Attorney

ATTACHMENT " 12 "

LOZEAU DRURY LLP

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BY E-MAIL

September 13, 2023

Rick Caguiat
Community Development Director
Planning Commission Secretary
Community Development Department
390 Towne Centre Drive
Lathrop, California 95330
planning@ci.lathrop.ca.us

Re: Comment on Planning Commission Agenda Items No. 8.3 Regarding the Ashley Furniture Project (Conditional Use Permit No. CUP-23-08; Site Plan Review No. SPR 23-09)

Dear Mr. Caguiat and Honorable Members of the Planning Commission:

I am writing on behalf of Laborers' International Union of North America, Local Union No. 73 ("LIUNA") regarding the proposed Ashley Furniture Project proposed to be located at the northwest corner of Dos Reis Rd and Manthey Road. The Planning Commission staff have determined that the project is exempt from the requirement for preparation of environmental documents pursuant to California Environmental Quality Act ("CEQA") Guidelines, Section 15183 and Public Resources Code § 21083.3. However, after reviewing the Environmental Checklist and relevant appendices prepared for the Project, and the 2022 General Plan Update EIR that the Project relies upon, we conclude that the Project does not meet the requirements for an exemption under CEQA Guideline § 15183 and PRC § 21083.3. LIUNA respectfully requests that the Planning Commission not recommend approval of each of the agenda items addressed by the proposed exemption and, in particular, the proposed Ashley Furniture Project, and instead request staff to prepare the necessary environmental documents under CEQA.

I. PROJECT DESCRIPTION

The Project proposes to construct and operate a 1,486,607 square foot industrial building including a mix of retail, office/call center, and warehouse and distribution uses. About 110,000 square feet would be dedicated to retail use, 24,000 square feet to office and call-center uses, and 1,352,347 square feet to warehouse and distribution center uses.

The Project proposes to construct approximately 2,046 parking spaces throughout the development site, with 942 spaces for passenger vehicles and 1,104 spaces for truck trailer parking. The Project expects to generate 2,798 daily passenger vehicle trips, including 203 a.m. peak hour trips (124 inbound, 79 outbound) and 255 p.m. peak hour trips (110 inbound, 145 outbound) for passenger vehicles. Another 680 daily truck trips also are expected, including 95 a.m. peak hour trips and 45 p.m. peak hour trips.

II. LEGAL STANDARD

To achieve its objectives of environmental protection, CEQA has a three-tiered structure. 14 CCR § 15002(k); *Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86 *("Hollywoodland")*. First, if a project falls into an exempt category, or it can be seen with certainty that the activity in question will not have a significant effect on the environment, no further agency evaluation is required. *Id.* Second, if there is a possibility the project will have a significant effect on the environment, the agency must perform an initial threshold study. *Id.*; 14 CCR § 15063(a). If the study indicates that there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment the agency may issue a negative declaration. *Id.*; 14 CCR §§ 15063(b)(2), 15070. Finally, if the project will have a significant effect on the environment, an environmental impact report ("EIR") is required. *Id.*

Here, since the City purports to exempt the Project from CEQA entirely, the first step of the CEQA process applies. "Exemptions to CEQA are narrowly construed and '[e]xemption categories are not to be expanded beyond the reasonable scope of their statutory language." *Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 125. The determination as to the appropriate scope of an exemption is a question of law subject to independent, or de novo, review. *San Lorenzo Valley Community Advocates for Responsible Education v. San Lorenzo Valley Unified School Dist.*, (2006) 139 Cal. App. 4th 1356, 1375 ("[Q]uestions of interpretation or application of the requirements of CEQA are matters of law. Thus, for example, interpreting the scope of a CEQA exemption presents 'a question of law, subject to de novo review by this court.'")

Here, the City proposes that the Project is exempt from CEQA review under Section 15183 and PRC § 21083.3. However, as discussed below, the use of these streamlining provisions is improper, and instead, a full CEQA analysis, such as an EIR, must be prepared for this Project.

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III. DISCUSSION

a. The City Incorrectly Applied CEQA's Section 15183 Categorical Exemption to the Project and Thus a Full CEQA Analysis is Required.

Section 15183 of the California Environmental Quality Act allows a project to avoid environmental review if it is "consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified . . . **except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.**" 14 CCR 15183 (emphasis added). *See* PRC § 21083.3(b). The intention of this section is to "streamline[]" CEQA review for projects and avoid the preparation of repetitive documents. While the City refers to these provisions as exemptions from CEQA, environmental review is still required for various types of impacts, including those "peculiar to the project or parcel on which the project would be located," those which "were not analyzed as significant effects in a prior EIR," "are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR," or "[a]re previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR."

Section (f) of section 15183 states that a Project's environmental effects are not peculiar to a project if "uniformly applied development policies or standards have been previously adopted" which serve to mitigate environmental impacts, "unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect." The standard set forth by the statute for this analysis is substantial evidence.

Here, there is substantial evidence demonstrating that the Project will have significant impacts which were not addressed in the EIR prepared for the 2022 General Plan Update. Section 15183 therefore does not apply, and the City must prepare appropriate CEQA documents for this Project.

b. The City Must Prepare a Statement of Overriding Considerations With Regard to This Project.

The 2022 General Plan Update concluded that several of the impacts identified as a result of the General Plan Update project were significant and unavoidable. These impacts included agricultural resources, air quality, greenhouse gas, and traffic noise impacts. In the Environmental Checklist prepared for the Project, the City acknowledges these significant and unavoidable impacts, but states that:

> Impacts from buildout of the General Plan including cumulative impacts associated with development and buildout of the CLSP Phase 2 plan area

> and the warehouse Project site, as proposed, were fully addressed in the General Plan EIR (State Clearinghouse No. 2021100139), and implementation of the proposed project would not result in any new or altered impacts beyond those addressed in the General Plan EIR.

Envt'l Checklist, p. 13. Similar statements are repeated for each of the specific unavoidable significant impacts. This conclusion does not, however, address all of the City's obligations to grapple with acknowledged significant and unavoidable cumulative impacts.

In the case of *Communities for a Better Environment v. Cal. Resources Agency*, the court of appeal held that, although tiering may allow a later project to rely on the environmental analysis contained in a prior program-level EIR, that procedure does not relieve the agency of acknowledging the significant and unavoidable impacts and reconsidering its statement of overriding considerations. As the Court explained:

> The section appears to allow an agency, in approving a later project that has significant unavoidable impacts, to forego making a statement of overriding considerations *specifically tied to that project*. This is contrary to CEQA law. CEQA section 21094, subdivision (d) requires agencies that approve a later project to comply with CEQA section 21081. Under CEQA section 21081, an agency approving a project with significant environmental effects must find that each effect will be mitigated or avoided, or "that *specific* overriding economic, legal, social, technological, or other benefits of *the project* outweigh the ... effect[] ...."[65] The requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmentally detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support.[66] Under Guidelines section 15152(f)(3)(C), however, an agency apparently could adopt one statement of overriding considerations for a prior, more general EIR, and then avoid future political accountability by approving later, more specific projects with significant unavoidable impacts pursuant to the prior EIR and statement of overriding considerations. Even though a prior EIR's *analysis* of environmental effects may be subject to being incorporated in a later EIR for a later, more specific project, the responsible public officials must still go on the record and explain specifically why they are approving the later project despite *its* significant unavoidable impacts.

Communities for a Better Env't v. California Res. Agency, 103 Cal. App. 4th 98, 124–25, 126 Cal. Rptr. 2d 441 (2002), *as modified* (Nov. 21, 2002), and *disapproved of on other grounds by Berkeley Hillside Pres. v. City of Berkeley*, 60 Cal. 4th 1086, 343 P.3d 834 (2015).

The same reasoning applies to the implementation of Pub. Res. Code § 21083.3 and 14 Cal. Admin. Code § 15183. The Project, based on its reliance on the 2022 General Plan Update EIR, will have cumulative impacts on agricultural resources, air quality, greenhouse gas emissions, and traffic noise. Although sections 21083 and 15183 provide for streamlining of the environmental review of a subsequent project, neither section relieves the City from its obligation to make a statement of overriding considerations for the Project. PRC § 21081. Prior to recommending the Project and applying the streamlining provisions, the Planning Commission should prepare a statement of overriding considerations supported by substantial evidence and which evaluates whether any additional feasible mitigation measures applicable to this specific project should be required in order to address the acknowledged cumulative impacts.

c. The Project Will Have Project-Specific Significant Effects Which Were Not Addressed in the 2022 General Plan Update EIR.

LIUNA is concerned that a number of significant environmental impacts peculiar to the Project were not addressed in the 2022 General Plan Update EIR. As a result, Pub. Res. Code § 21083.3 and 14 Cal. Admin. Code § 15183 do not apply and either a mitigated negative declaration or EIR must be prepared to address these unanalyzed impacts.

i. Biological Resources

According to the 2022 General Plan EIR, the federally-listed, endangered valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) did not occur within one-mile of the planning area. GP EIR, p. 3.4-15. As a result, there is no focused discussion in the 2022 General Plan EIR on any impacts to this federally-listed species. In general, the 2022 General Plan EIR concludes that there will be no significant impacts to listed species from the General Plan's implementation. GP EIR, p. 2.4-28 – 3.4-29. The valley elderberry longhorn beetle relies on a particular host plant for its survival – the red or blue elderberry. *See* Biological Resources Analysis Report, p. 18. The reconnaissance survey conducted for the Biological Resources Analysis observed a 6-foot by 15-foot elderberry shrub on the property. *Id.*, p. 19. The presence of that host plant, the enhanced likelihood of the presence of the endangered valley elderberry longhorn beetle, and the heightened risk of adverse affects on the host plant or potentially present beetles are not addressed as a significant impact in the 2022 General Plan EIR and these effects are peculiar to the Project site. Pub. Res. Code § 21083.3. Given these facts peculiar to the site, it "might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." 14 CCR 15183.

Likewise, the observed presence of a Swainson's hawk foraging on the project site and nesting within 20 feet of the site also results in obvious effects peculiar to the project site, including not only the direct loss of foraging habitat but also disturbances from construction activities at the site and a dramatic increase in vehicles using Dos Reis Road to access the project once it is operational. Because impacts to Swainson's hawks were not addressed as significant impacts in the 2022 General Plan EIR and impact to a Swainson's hawk is peculiar to the site, those potential impacts must be addressed in a proper CEQA environmental review document and reliance on Pub. Res. Code § 21083.3 and 14 Cal. Admin. Code § 15183 is inappropriate.

Given the very limited reconnaissance-level survey performed on a single day at the Project site on May 5, 2021, LIUNA is concerned that there are numerous other listed and sensitive species foraging or located at the Project site. No effort has been made to determine the current presence of burrowing owls at the site. The past presence of red-tailed hawks and white-tailed kites foraging at the site also excludes the proposed streamlining exemption. A current and more robust survey of the Project site is necessary for the City to make any decision on these potential impacts based on substantial evidence.

In addition, the 2022 General Plan EIR does not identify the significant potential impact of the Project's thousands of trucks and car trips on wildlife from vehicle collisions with wildlife. This impact is peculiar to the Project given its proposed 2,798 daily passenger vehicle trips and 680 daily truck trips which will lead to wildlife collisions in the vicinity of the Project. Because this project-specific direct and cumulative effect was not addressed at all in the 2022 General Plan EIR, it must be addressed in an EIR or potentially a mitigated negative declaration for the Project. *See* PRC § 21083.3(c) ("Nothing in this section affects any requirement to analyze potentially significant offsite impacts and cumulative impacts of the project not discussed in the prior environmental impact report with respect to the general plan").

ii. Energy

The 2022 General Plan EIR's discussion of the General Plan's energy impacts boils down to stating that by complying with California's Building Energy Efficiency Standards ("CalGreen"), promoting the use of renewable energy sources and encouraging public transportation and bicycle use, and the fact that PG&E will generally make progress on adding new renewable energy sources to its portfolio, projects within the planning area will not have energy impacts. GP EIR, p. 3.7-41 – 3.7-42. The Environmental Checklist focuses on the Ashley Furniture Project's compliance with CalGreen and PG&E's long-term efforts. Env't Checklist, p. 66. None of these considerations address the energy effects that are peculiar to a 1.4 million square feet furniture distribution and retail center.

The standard under CEQA is whether the Project would result in wasteful, inefficient, or unnecessary consumption of energy resources. Failing to undertake "an investigation into renewable energy options that might be available or appropriate for a project" violates CEQA. *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 213. Energy conservation under CEQA is defined as the "wise and efficient use of energy." CEQA Guidelines, app. F, § I. The "wise and efficient use of energy" is achieved by "(1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) increasing reliance on renewable energy resources." *Id.*

Noting compliance with the California Building Energy Efficiency Standards (Cal.Code Regs., tit. 24, part 6 (Title 24) does not constitute an adequate analysis of energy impacts. *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264-65. Similarly, the court in *City of Woodland* held unlawful an energy analysis that relied on compliance with Title 24, that failed to assess transportation energy impacts, and that failed to address renewable energy impacts. *California Clean Energy Committee v. City of Woodland,* 225 Cal.App.4th 173, 209-13. As such, the General Plan EIR's reliance on Title 24 compliance does not address the proposed furniture warehouse Project's energy impacts. The energy effects of the Project are, by definition, peculiar to the Project. Given the vast expanse of roofing provided by the proposed Project, any evaluation of its energy impacts cannot ignore the obvious feasibility of an array of solar panels on the roof or covering the extensive parking proposed at the site. Energy efficiency, in the context of the Proposed project and site would require the consideration and implementation of sufficient solar panels to meet all of the Project's direct electricity demand, as well as solar power that would offset the considerable GHG and other air pollution emissions that will result from the thousands of trucks and cars driving to and from the Project every day once it's operational.

The Environmental Checklist contains no discussion of the project's cost effectiveness in terms of energy requirements. There is no discussion of energy consuming equipment and processes that will be used during the construction or operation of the project. The project's energy use efficiencies by amount and fuel type for each stage of the project including construction and operation were not identified. The effect of the project on peak and base period demands for electricity has not been addressed. As such, the Environmental Checklist's conclusions are unsupported by the necessary discussions of the Project's energy impacts under CEQA. An EIR or possibly a mitigated negative declaration must be prepared to assess these impacts.

iii. Greenhouse Gases and Air Quality.

The 2022 General Plan EIR did not project air pollution emissions for any given project that would be allowed by the plan. Instead, it identifies the implementation measure in the General Plan that the City "[review development, infrastructure, and planning projects for consistency with SJVAPCD requirements during the CEQA review process." GP EIR, p. 3.3-35 (RR-6a). The General Plan and the EIR go on to further require that:

> Require project applicants to prepare air quality analyses to address SJVAPCD and General Plan requirements, which include analysis and identification of:
> A. Air pollutant emissions associated with the project during construction, project operation, and cumulative conditions.
> B. Potential exposure of sensitive receptors to toxic air contaminants.
> C. Significant air quality impacts associated with the project for construction, project operation, and cumulative conditions.
> D. Mitigation measures to reduce significant impacts to less than significant or the maximum extent feasible where impacts cannot be mitigated to less than significant.

Id. Although the Environmental Checklist purports to describe these evaluation efforts, the Checklist does not provide any of the input files for the air pollution modeling conducted for the proposed Project. Only the output files are provided. Environmental Checklist, Attachment I, p. 162. Given the size of the warehouse and the number of expected daily truck trips, LIUNA is skeptical that the emissions forecasts identified for its construction and operation can be substantiated. Before making a recommendation to the Council, the Planning Commission should require staff and the applicant to share their input files for the CalEEMod modeling in order for the public to be able to assess the accuracy of the model outputs and whether or not the Project's may have a significant effect on air quality and GHG emissions and the extent of necessary mitigation measures as required by the General Plan.

IV. CONCLUSION

In light of the above comments, the City must prepare an EIR or, if appropriate, a mitigated negative declaration for the Project. LIUNA reserves its right to submit additional comments and evidence for any subsequent Planning Commission hearing or the City Council's consideration of the Project. Thank you for considering these comments.

Sincerely,

Michael R. Lozeau

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ATTACHMENT " 13 "

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October 6, 2023

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**Re: Comment on Ashley Furniture Project (CUP-23-08; SPR 23-09)
City Council Agenda Item No. 5.3**

Dear Mayor Dhaliwal, Vice Mayor Akinjo, and Honorable Councilmembers:

I am writing on behalf of Laborers' International Union of North America, Local Union No. 73 ("LIUNA") regarding the Ashley Furniture Project ("Project") proposed to be located at the northwest corner of Dos Reis Rd and Manthey Road. The Planning Commission voted to recommend that the City Council find that the project is exempt from the California Environmental Quality Act ("CEQA") pursuant to CEQA Guidelines section 15183 (14 CCR § 15183) and Public Resources Code ("PRC") section 21083.3. However, after reviewing the Environmental Checklist prepared for the Project and the 2022 General Plan Update EIR that the Project relies upon, we conclude that the Project does not meet the requirements for an exemption under CEQA Guideline § 15183 and PRC § 21083.3. As such, LIUNA respectfully requests that the City Council refrain from approving the Project until the Project undergoes environmental review under CEQA.

PROJECT DESCRIPTION AND BACKGROUND

The Project proposes to construct and operate a 1,486,607 square foot industrial building including a mix of retail, office/call center, and warehouse and distribution uses. About 110,000 square feet would be dedicated to retail use, 24,000 square feet to office and call-center uses, and 1,352,347 square feet to warehouse and distribution center uses.

The Project proposes to construct approximately 2,046 parking spaces throughout the development site, with 942 spaces for passenger vehicles and 1,104 spaces for truck trailer parking. The Project expects to generate 2,798 daily passenger vehicle trips, including 203 a.m. peak hour trips (124 inbound, 79 outbound) and 255 p.m. peak hour trips (110 inbound, 145 outbound) for passenger vehicles. Another 680 daily truck trips also are expected, including 95 a.m. peak hour trips and 45 p.m. peak hour trips.

The Project site is located within the Central Lathrop Specific Plan ("CLSP") Phase 2 area, which was approved by the City in 2004. In 2022, the City certified an environmental impact report ("EIR") for the City's 2022 General Plan Update ("2022 GP EIR"), which changed the land use designations in the CLSP Phase 2 area from Residential/Commercial to Limited Industrial. An Environmental Checklist was prepared for the Project to evaluate consistency with the 2022 GP EIR.

On September 13, 2023, the Planning Commission voted to recommend that the City Council approve the Project conditional use permit (CUP-23-08) and site plan review (SPR-23-09) and find that the Project is exempt from further environmental review under Public Resources Code section 21083.3 and CEQA Guidelines section 15183 because the Project would not result in any impacts beyond those addressed in the 2022 GP EIR. Prior to the Planning Commission meeting, LIUNA submitted a written comment attached hereto as **Exhibit C** and incorporated by reference.

LEGAL STANDARD

To achieve its objectives of environmental protection, CEQA has a three-tiered structure. (*Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86 (*Hollywoodland*) [citing 14 CCR § 15002(k)].). First, if a project falls into an exempt category, or it can be seen with certainty that the activity in question will not have a significant effect on the environment, no further agency evaluation is required. (*Id.* at 1185.) Second, if there is a possibility the project will have a significant effect on the environment, the agency must perform an initial threshold study and may issue a negative declaration if the study indicates no significant impacts. (*Id.* at 1185-86; see also 14 CCR §§ 15063(b)(2), 15070.) Finally, if the project will have a significant effect on the environment, an environmental impact report ("EIR") is required. (*Hollywoodland*, *supra*, 161 Cal.App.4th at 1186.)

Here, the Planning Commission recommended that the City Council find the Project exempt from CEQA under CEQA Guidelines section 15183 ("Section 15183"), which, for projects "which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified," does not require additional environmental review for such projects "except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." (14 CCR § 15183(a).)

The purpose of Section 15183 is to streamline CEQA review and relieves the City of the obligation to prepare an EIR if a qualifying project's impacts "[are] not peculiar to the parcel or to the project, [have] been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards." (14 CCR § 15183 (c).) Section 15183 further explains,

> An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the city or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect.

(14 CCR § 15183(f).) A city's decision to utilize Section 15183 is governed by the substantial evidence standard of review. (*Lucas v. City of Pomona* (2023) 92 Cal.App.5th 508, 538.)

DISCUSSION

I. The Project Is Not Exempt from CEQA Under Section 15183 Due to Unmitigated, Project-Specific Impacts to Biological Resources.

LIUNA retained wildlife biology expert Dr. Shawn Smallwood, Ph.D., who conducted a site visit and reviewed the Project's documentation, including the Environmental Checklist and the Biological Resources Analysis Report prepared by Olberding Environmental, Inc. dated May 2021 ("Biological Report"). Dr. Smallwood found the Project would result in significant, unmitigated impacts to multiple special-status species of wildlife. Dr. Smallwood's comment and CV are attached as **Exhibit A**.

A. The Project's Biological Report underestimates the diversity of species using the Project site.

Dr. Smallwood conducted a site visit to the Project site for approximately 2.5 hours on September 21, 2023. (Ex. A, p. 1.) During those visits, Dr. Smallwood "detected 35 species of vertebrate wildlife, including 10 special-status species," including Swainson's hawk, which is listed as a threatened species in California, and loggerhead shrike, a California Species of Special Concern priority level 2. (*Id.* at pp. 3-4.) Dr. Smallwood estimates that with additional surveys, a total of 178 species would be detected at the Project site, of which 51 would be special-status species. (*Id.*, p. 9.) Based on his site visit and projections, Dr. Smallwood concluded that "[m]ore surveys are needed" and "the species richness at the site relative to its level of disturbance is peculiar to the site." (*Id.*, p. 10.)

B. The Project's Biological Report fails to accurately characterize the existing environmental setting.

Dr. Smallwood found that the Project's Biological Report failed "to accurately characterize the existing environmental setting, including the biological species that use the site, their relative abundances, how they use the site, key ecological relationships, and known and ongoing threats to those species with special status." (Ex. A, p. 10.) He explains that an accurate characterization of the environmental setting typically relies on two factors: (1) field surveys and (2) reviews of literature and databases. (*Id.*) For this Project, "these needed steps were grossly inadequate." (*Id.*)

First, the Biological Report's field survey lacked critical information, including the time of day of the survey or the duration of the survey, and did not meet the minimum standards for surveys of plants (Ex. A, p. 11.) Further, the Biological Report's survey only detected 6 species of vertebrate wildlife at the Project site, which is that number that Dr. Smallwood detected in his first *two minutes* on the Project site on September 21, 2023. (*Id.*) The survey also only detected 3 special-status species, whereas Dr. Smallwood detected 10. (*Id.*) Additionally, the Biological Report's survey made no mention of the great horned owl pellets, kangaroo rat and Botta's pocket gopher burrow systems, or birds smaller than a white-tailed kite as were observed by Dr. Smallwood. (*Id.*) The Biological Report had no surveys for bats or several special-status species known to occur in the area, including burrowing owl and Swainson's hawk. (*Id.*)

Second, the Biological Report's review of available wildlife databases was inadequate. (Ex. A, pp. 12-13.) The Biological Report relied solely on the California Natural Diversity Data Base ("CNDDB") to determine which species have potential to occur in the project area. The Biological Report did not consult other known databases, such as iNaturalist or eBird. When searching CNDDB, the Biological Report only searched for species with documented occurrences within the nearest CNDDB quadrangles, which "screens out many special-status species from further consideration in the characterization of the wildlife community as part of the baseline environmental setting." (*Id.*, p. 12.) Furthermore, "CNDDB is not designed to support absence determinations or to screen out species from characterization of a site's wildlife community." (*Id.*) Based on available databases and site visits, Dr. Smallwood estimates that "107 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential." (*Id.*, p. 20.)

Third, the Biological Report improperly assumed that the Project site's lack of *nesting habitat* means that development of the Project would not cause impacts to wildlife species. However, as Dr. Smallwood explains,

> [T]here is no sound scientific distinction between nesting habitat and some other characterization of habitat. For any given species, the environment of a site is either habitat or it is not, as habitat is defined as that part of the environment that is used by a species. . . . Certain portions of a species' habitat may provide nesting opportunities, but all parts of its habitat are critical to the nesting success of members of the species. If an animal cannot find sufficient forage and cover during non-nesting season or at portions of its habitat where it does not normally nest, then it might not survive to reproduce or its nesting attempt might not succeed. [The Biological Report] asserts a false distinction of the value of a site based on whether

the species nests on-site.

(Ex. A, p. 19.) By limiting habitat to only nesting habitat, the Biological Report underestimates the value of the Project site and the impacts to species that may occur. For example, the Biological Report claimed that loggerhead shrike have a low likelihood of occurrence on the Project site due to lack of trees and shrubs needed for nesting. However, Dr. Smallwood observed a loggerhead shrike foraging on the Project site during his site visit. This is just one example of how the Biological Report misjudged the occurrence likelihood of the many special-status species discussed in the Biological Report as well as the potential wildlife impacts peculiar to this specific site.

C. The Biological Report failed to adequately analyze and mitigate the Project's biological impacts due to habitat loss, wildlife movement, and vehicle collisions.

Dr. Smallwood found that the Biological Report and Environmental Checklist failed to address numerous potentially significant impacts that the Project may have on biological resources, including habitat loss, wildlife movement, collision mortality due to Project-generated traffic, and cumulative impacts. (Ex. A, pp. 18-25.)

1. Habitat Loss and Fragmentation

Dr. Smallwood warns that "[t]he project would destroy 89.92 acres of habitat to every species of wildlife that makes use of the project site." (Ex. A, p. 20.) Dr. Smallwood predicts that development of the Project would result in the loss of 191 bird nest sites and a lost breeding capacity of 630 birds per year. (*Id.*, pp. 20-21.) Dr. Smallwood concludes that this impact is significant. (*Id.*)

2. Wildlife Movement

The Biological Report provided a "flawed and misleading" analysis of the Project's impact on wildlife movement. (Ex. A, p. 21.) According to the Environmental Checklist, the Biological Report "included a CNDDB record search that did not reveal any documented wildlife corridors or wildlife nursery sites on or adjacent to warehouse site." However, as Dr. Smallwood explains, "CNDDB is not where an analyst would find information relevant to whether a site is important to wildlife movement. . . . . In effect, there is no analysis of whether the project would interfere with wildlife movement." (*Id.*)

The Environmental Checklist also claims that the Project's impacts on wildlife movement were adequately addressed in the 2022 GP EIR. However, the 2022 GP EIR only focused on the San Joaquin River as a wildlife corridor. As such, "[t]he General Plan EIR implies the premise that interference with wildlife movement in the region can result only from a project's disruption of the function of a wildlife movement corridor." (Ex. A, p. 21.) This is not the proper standard under CEQA. Rather, CEQA requires an analysis of impacts to wildlife movement "regardless of whether the movement is channeled by a corridor. A site such as the project site is critically important for wildlife movement because it composes an increasingly diminishing area of open space within a growing expanse of anthropogenic uses, forcing more species of volant wildlife to use the site for stopover and staging during migration, dispersal, and home range patrol." (*Id.*) By ignoring this standard, the Biological Report has failed to adequately and mitigate the Project's impacts on wildlife movement disruptions that are unique to the Project site.

3. Vehicle Collisions

The Biological Report and 2022 GP EIR failed to analyze wildlife mortality and injuries caused by Project-generated traffic. (Ex. A, pp. 22-24.) Dr. Smallwood estimates that the Project would result in 6,151 vertebrate deaths annually due to collisions with Project-generated traffic. (*Id.*, pp. 24.) Especially due to the special-status species likely to occur at or near the Project, these collisions represent a significant impact to wildlife that has not been addressed, discussed, or mitigated by the Environmental Checklist or 2022 GP EIR. But for the Project, these additional wildlife collisions would not occur.

4. Cumulative Impacts

The Environmental Checklist concludes that cumulative impacts to biological resources were addressed in the 2022 GP EIR, which relies on the San Joaquin Multi-Species Habitat Conservation Plan ("SJMSCP") to prevent significant cumulative impacts. However, as discussed in greater detail below, the SJMSCP has failed at conserving wildlife species and cannot be relied upon to conclude that cumulative impacts will be less than significant. (Ex. A, pp. 24-25.)

D. The Project cannot rely on the SJMSCP to mitigate the Project's impacts to biological resources.

To mitigate the project's impacts to biological resources, the Environmental Checklist requires compliance with the SJMSCP, as required by the 2020 General Plan. (Envt. Checklist, p. 55.) However, as Dr. Smallwood explains, the SJMSCP cannot be relied upon to mitigate the Project's impacts "[d]ue to grossly deficient implementation and due to poor performance of the SJMSCP." (Ex. A, p. 25.) Dr. Smallwood identified several shortcomings of the SJMSCP, as discussed below.

First, the majority of special-status species likely to occur at the Project site are not covered by the SJMSCP. (Ex. A, p. 26.) As a result, "the SJMSCP insufficiently covers special-status species that would be adversely affected by the project." (*Id.*) The reason that so many species are not covered by the SJMSCP is that more and more species have been designated as "special-status" since adoption of the SJMSCP. The SJMSCP does not provide any protection for those species.

Second, the SJMSCP requires protocol-level detection surveys. (Ex. A, p. 26.) Yet, no such surveys have been conducted on the Project site. (*Id.*) Detection surveys must be conducted, especially for burrowing owl and Swainson's hawk, to properly comply with the SJMSCP.

Third, Dr. Smallwood conducted an in-depth review of the SJMSCP and found that, to date, the SJMSCP has utterly failed at conserving special status-species. (Ex. A, pp. 26-33.)[1] To conduct his analysis, Dr. Smallwood reviewed the SJMSCP's Annual Reports published since 2008. As an initial matter, he found that the Annual Reports had flaws with study design, deficient implementation, and poor reporting, including inconsistent naming of preserve areas, a failure to conduct any trend analysis, and a failure to report survey methods including time, duration, or standards. (*Id.*, pp. 27-28.) Dr. Smallwood's review of the Annual Reports revealed several unsettling trends demonstrating the SJMSCP's failure to conserve species, including a decline in Swainson's hawk detections (*id.*, p. 29), a decline in detections of species covered by the SJMSCP (*id.*, p. 30), a decline in detections of all species (*id.*), a decline in the productivity of Swainson's hawk (*id.*, p. 32), and a decline in the number of acres surveyed (*id.*, p. 33). Based on this analysis, Dr. Smallwood concludes that "[t]he SJMSCP has failed in its implementation, and it has proven ineffective at conserving its covered species; it should not be used to mitigate impacts to wildlife that occur on the project site. (*Id.*)

Although Section 15183 exempts project from further CEQA review where project-specific impacts can be mitigated by uniformly applied development policies or standards (such as the SJMSCP), the exemption does not apply if "new information shows that the policies or standards will not substantially mitigate the environmental effect." (14 CCR § 15183(f).) Here, Dr. Smallwood's analysis of the SJHSCP's Annual Records presents new information showing that the SJMSCP has failed to substantially mitigate impacts to wildlife and, therefore, cannot substantially mitigate the Project's impacts. As a result, the City's reliance on Section 15183 is misplaced.

E. The additional mitigation measures required for the Project's impacts to biological resources are inadequate and render the Project ineligible for an exemption under Section 15183.

In addition to compliance with the SJMSCP, the Project is required to adopt the mitigation recommendations identified in the Biological Report, which include preconstruction surveys for reptiles, birds, and burrowing owls. (Envt'l Checklist, pp. 52-54.) The need for these additional mitigation measures is proof in and of itself that the Project will result in Project-specific impacts that have not been adequately addressed or mitigated by the 2022 GP EIR. Section 15183 exempts projects with project-specific impacts only where those impacts "can be substantially mitigated by the imposition of uniformly applied development policies or standards." (14 CCR § 5183(c).) The preconstruction surveys required for this Project are *not* uniformly applied policies or standards. Rather, they are specific mitigation measures taken from

[1] The data utilized in Dr. Smallwood's evaluation of the SJMSCP is available at: https://www.dropbox.com/scl/fo/mzkfrnz0utg7gd6oldk4b/h?rlkey=zkfl5bmetrp0g95u9mi7kxtc3&dl=0

the Biological Report specifically designed to mitigate *this* Project's peculiar impacts to wildlife that are not addressed in the 2022 GP EIR. As a result, the Project does not qualify for an exemption under Section 15183 and further CEQA analysis is required for the Project.

Moreover, as Dr. Smallwood explains, pre-construction surveys are inadequate to mitigate the Project's impacts. (Ex. A, pp. 33-35.) Rather, protocol-level detection surveys are necessary because detection surveys have a much greater probability of detection than pre-construction-surveys. (*Id.*, p. 33.) Dr. Smallwood explains that "[b]irds are highly skilled at hiding their nests" and "[l]oggerhead shrikes and burrowing owls, as examples, make efforts to fool human observers into thinking the birds' nests are located where they are not." (*Id.* p. 34.) As a result, "[l]ocating nest sites of these species and most others requires multiple surveys over long time periods . . . This is why the breeding-season survey protocols require multiple surveys spaced through much of the breeding season." (*Id.*) Furthermore, even with pre-construction surveys, impacts to wildlife would not be reduced to less-than-significant levels because such surveys do nothing to mitigate the additional impacts identified by Dr. Smallwood, including breeding capacity and habitat fragmentation. (*Id.*) Therefore, the Project will result in Project-specific impacts to biological resources that remain significant and unmitigated.

II. The Analysis of the Project's Impacts to Human Health from Emissions of Toxic Air Contaminants Is Inadequate.

For warehouses and distribution centers within 1,000 feet of planned residential uses or other sensitive receptors, the 2022 General Plan requires "requires the preparation of a Health Risk Assessment ("HRA") that meets the standards established by the Office of Environmental Health Hazard Assessment ("OEHHA"), and the San Joaquin Valley Air Pollution Control District ("SJVAPCD"). (2022 GP, p. 3.3-31 [LU-5c].) The General Plan prohibits approval of such a project " until it can be demonstrated that the project would not result in an exceedance of the established thresholds of significance for public health risks at nearby sensitive receptors." (*Id.*)

Here, there are numerous sensitive receptors within 1,000 feet of the Project, including clusters of residences 320 feet, 400 feet, and 940 feet away and a single residence 820 feet away (Envt'l Checklist, p. 43.) According to the Environmental Checklist, an HRA was conducted and found that the Project's increased cancer risk from emissions of diesel particulate matter ("DPM") would not exceed SJVAPCD's significance threshold of 20 in one million. (*Id.*, pp. 44-45.) LIUNA retained air quality experts Matt Hagemann, P.G., C.Hg., and Paul E. Rosenfeld, Ph.D., of the Soil/Water/Air Protection Enterprise ("SWAPE") to review the HRA. SWAPE found that HRA did not comply with the standards established by OEHHA and, as a result, the Project's impacts had not been adequately evaluated. SWAPE's comment and CVs are attached as **Exhibit B**.

First, SWAPE notes that the Checklist failed to provide the exposure assumptions for the HRA, such as the age sensitivity factors ("ASF") or fraction of time at home ("FAH") values, and, as a result, the HRA may underestimate the Project's increased cancer risk. (Ex. B, p. 2.)

Additionally, the Checklist failed to provide the dose and risk equation used to calculate the Project's cancer risks. (*Id.*) Without providing this equation, there is no way to verify that the HRA utilized the proper equation recommended by OEHHA. (*Id.*)

Second, even though the 2022 General Plan requires that the HRA meet the standards established by OEHHA, the HRA prepared for the Project failed to do so because it only analyzed the Project's *operational* cancer risks but completely ignored the Project's *construction-related* cancer risks. According to OEHHA, the cancer risk of all short-term projects lasting at least 2 months should be assessed and projects lasting more than 6 months should be evaluated for the duration of the project. (Ex. B, p. 3.) Because construction of the Project will surely last at least 2 months (and may exceed six months), the HRA should have included construction-related emissions in addition to operational emissions. The HRA further conflicts with OEHHA guidance by failing to evaluate the lifetime cancer risk to nearby receptors as a result of Project construction and operation *combined*. (*Id.*)

Due to these shortcomings, the HRA does not comply with OEHHA standards as required by the 2022 General Plan and underestimates the Project's cancer risks. As a result, the City lacks substantial evidence to conclude that the Project will not result in specific health impacts. Furthermore, the City lacks substantial evidence to conclude that the Project's impacts were addressed in the 2022 GP EIR since the 2022 General Plan required compliance with OEHHA standards, which the Project's HRA did not do. The HRA must be updated prior to any approval of the Project.

III. The Analysis of the Project's Energy Impacts Is Inadequate.

The 2022 GP EIR's discussion of the General Plan's energy impacts boils down to stating that by complying with California's Building Energy Efficiency Standards ("CalGreen"), promoting the use of renewable energy sources and encouraging public transportation and bicycle use, and the fact that PG&E will generally make progress on adding new renewable energy sources to its portfolio, projects within the planning area will not have energy impacts. (2022 GP EIR, pp. 3.7-41 to 3.7-42.) The Environmental Checklist focuses on the Ashley Furniture Project's compliance with CalGreen and PG&E's long-term efforts. (Env't Checklist, p. 66.) None of these considerations address the energy effects that are peculiar to a 1.4 million square feet furniture distribution and retail center.

The standard under CEQA is whether the Project would result in wasteful, inefficient, or unnecessary consumption of energy resources. Failing to undertake "an investigation into renewable energy options that might be available or appropriate for a project" violates CEQA. (*California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 213.) Energy conservation under CEQA is defined as the "wise and efficient use of energy." (CEQA Guidelines, app. F, § I.) The "wise and efficient use of energy" is achieved by "(1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) increasing reliance on renewable energy resources." (*Id.*)

Noting compliance with the California Building Energy Efficiency Standards (Cal.Code Regs., tit. 24, part 6 (Title 24)) does not constitute an adequate analysis of energy impacts. (*Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264-65.) Similarly, the court in *City of Woodland* held unlawful an energy analysis that relied on compliance with Title 24, that failed to assess transportation energy impacts, and that failed to address renewable energy impacts. (*California Clean Energy Committee v. City of Woodland*, 225 Cal.App.4th 173, 209-13.) As such, the General Plan EIR's reliance on Title 24 compliance does not address the proposed furniture warehouse Project's energy impacts. The energy effects of the Project are, by definition, peculiar to the Project. Given the vast expanse of roofing provided by the proposed Project, any evaluation of its energy impacts cannot ignore the obvious feasibility of an array of solar panels on the roof or covering the extensive parking proposed at the site. Energy efficiency, in the context of the Proposed project and site would require the consideration and implementation of sufficient solar panels to meet all of the Project's direct electricity demand, as well as solar power that would offset the considerable GHG and other air pollution emissions that will result from the thousands of trucks and cars driving to and from the Project every day once it's operational.

The Environmental Checklist contains no discussion of the project's cost effectiveness in terms of energy requirements. There is no discussion of energy consuming equipment and processes that will be used during the construction or operation of the project. The project's energy use efficiencies by amount and fuel type for each stage of the project including construction and operation were not identified. The effect of the project on peak and base period demands for electricity has not been addressed. As such, the Environmental Checklist's conclusions are unsupported by the necessary discussions of the Project's energy impacts under CEQA and the City lacks substantial evidence to exempt the Project under Section 15183.

IV. The City Must Prepare a Statement of Overriding Considerations.

The 2022 General Plan Update concluded that several of the impacts identified as a result of the General Plan Update project were significant and unavoidable. These impacts included agricultural resources, air quality, greenhouse gas, and traffic noise impacts. In the Environmental Checklist prepared for the Project, the City acknowledges these significant and unavoidable impacts, but states that:

> Impacts from buildout of the General Plan including cumulative impacts associated with development and buildout of the CLSP Phase 2 plan area and the warehouse Project site, as proposed, were fully addressed in the General Plan EIR (State Clearinghouse No. 2021100139), and implementation of the proposed project would not result in any new or altered impacts beyond those addressed in the General Plan EIR.

(Envt'l Checklist, p. 13.) Similar statements are repeated for each of the specific unavoidable significant impacts. This conclusion does not, however, address all of the City's obligations to grapple with acknowledged significant and unavoidable cumulative impacts.

In the case of *Communities for a Better Environment v. Cal. Resources Agency*, the court of appeal held that, although tiering may allow a later project to rely on the environmental analysis contained in a prior program-level EIR, that procedure does not relieve the agency of acknowledging the significant and unavoidable impacts and reconsidering its statement of overriding considerations. As the Court explained:

> The section appears to allow an agency, in approving a later project that has significant unavoidable impacts, to forego making a statement of overriding considerations *specifically tied to that project*. This is contrary to CEQA law. CEQA section 21094, subdivision (d) requires agencies that approve a later project to comply with CEQA section 21081. Under CEQA section 21081, an agency approving a project with significant environmental effects must find that each effect will be mitigated or avoided, or "that *specific* overriding economic, legal, social, technological, or other benefits of *the project* outweigh the ... effect[] ...." The requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmentally detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support. Under Guidelines section 15152(f)(3)(C), however, an agency apparently could adopt one statement of overriding considerations for a prior, more general EIR, and then avoid future political accountability by approving later, more specific projects with significant unavoidable impacts pursuant to the prior EIR and statement of overriding considerations. Even though a prior EIR's *analysis* of environmental effects may be subject to being incorporated in a later EIR for a later, more specific project, the responsible public officials must still go on the record and explain specifically why they are approving the later project despite *its* significant unavoidable impacts.

(*Communities for a Better Env't v. California Res. Agency* (2002) 103 Cal.App.4th 98, 124-25.).

The same reasoning applies to the implementation of Section 15183. The Project, based on its reliance on the 2022 GP EIR, will have cumulative impacts on agricultural resources, air quality, greenhouse gas emissions, and traffic noise. Although sections 21083 and 15183 provide for streamlining of the environmental review of a subsequent project, neither section relieves the City from its obligation to make a statement of overriding considerations for the Project. (PRC § 21081.) Thus, the City must prepare a statement of overriding considerations—supported by substantial evidence and evaluating whether any additional feasible mitigation measures applicable to this specific project— prior to approval of the Project.

CONCLUSION

In light of the above the Project does not qualify for an exemption from CEQA under

Section 15183 and, the City must prepare an EIR or, if appropriate, a mitigated negative declaration for the Project prior to approval.

Sincerely,

Brian B. Flynn

Brian B. Flynn
LOZEAU DRURY LLP

EXHIBIT A

Shawn Smallwood, PhD
3108 Finch Street
Davis, CA 95616

Attn: Rick Caguiat, Director of Community Development
The City of Lathrop
390 Towne Centre Dr
Lathrop, CA 95330

1 October 2023

RE: Ashley Warehouse Project

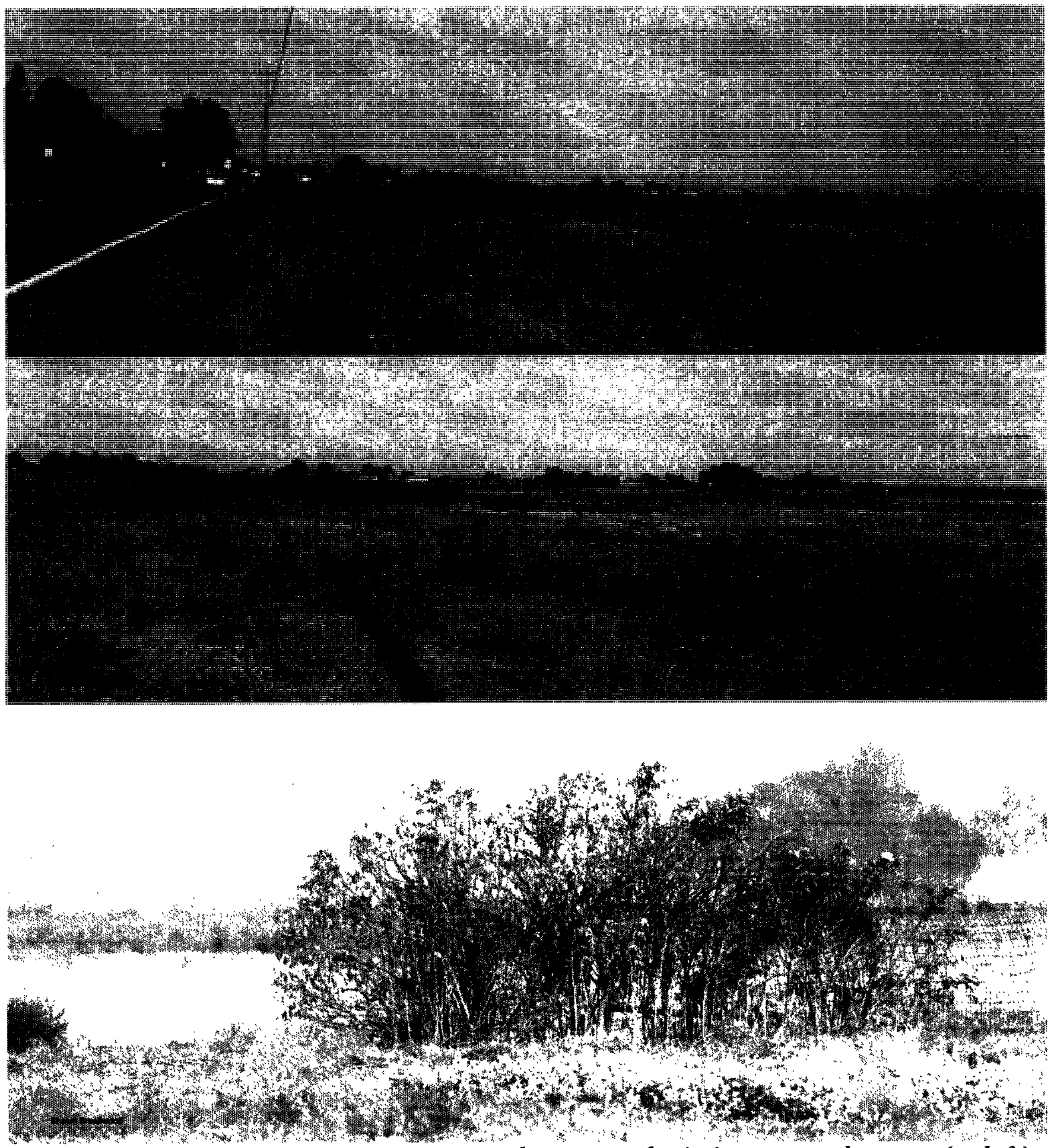
Dear Mr. Caguiat,

I write to comment on potential impacts to biological resources that could result from the Ashley Warehouse Project. I reviewed an Environmental Checklist prepared for the Central Lathrop Specific Plan (CLSP) Phase 2 Update, and Ashley Warehouse Project, and a biological resources assessment prepared by Olberding (2021). I understand the project would construct a 1,486,607 square-foot building up to 60 feet in height and 943 vehicle spaces, and 1,104 trailer spaces/stalls on 89.92 acres of what used to be in dryland agriculture, but which over the past decade has been unfarmed but repeatedly disced, leaving patches of ruderal grassland unreached by the discing assembly. I am concerned that the project would cause significant impacts to multiple special-status species of wildlife and to wildlife in general, and that the impacts would be insufficiently mitigated with participation in the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP), which is failing to conserve its covered species (see below). I am concerned that exemptions per CEQA Guidelines §15183 do not apply to this site nor to this project.

My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I also worked as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species. I authored many papers on these and other topics. I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and Raptor Research Foundation, and I've lectured part-time at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for thirty-seven years. My CV is attached.

SITE VISIT

I visited the site of the proposed project for 2.55 hours from 06:53 to 09:26 hours on 21 September 2023. I scanned for wildlife with use of binoculars from the roads bordering the site. I recorded all species of vertebrate wildlife I detected, including those whose members flew over the site or were seen adjacent to the site. Animals of uncertain species identity were either omitted or recorded to a higher taxonomic level. Weather was sunny with no wind and 55–65° F. The site was mostly disced, and otherwise covered by ruderal annal grassland (Photos 1–3).



Photos 1–3. *The project site on 21 September 2023, depicting at top the trees (at left) where Swainson's hawks nested, at middle a raised area that could not be disced, and at bottom a patch of elderberry on the project site's west side.*

Despite the disturbed nature of the project site, I detected 35 species of vertebrate wildlife, including 10 special-status species (Table 1). On the site were at least 3 Swainson's hawks (Photo 4), which is a threatened species under the California Endangered Species Act. The repeatedly landed on a nest located on the south side of Dos Reis Road. I also found red-tailed hawks (Photo 5) loggerhead shrikes (Photos 6 and 7), lesser goldfinches, Brewer's blackbirds and house finches (Photos 8–10), and California ground squirrels (Photos 11 and 12).

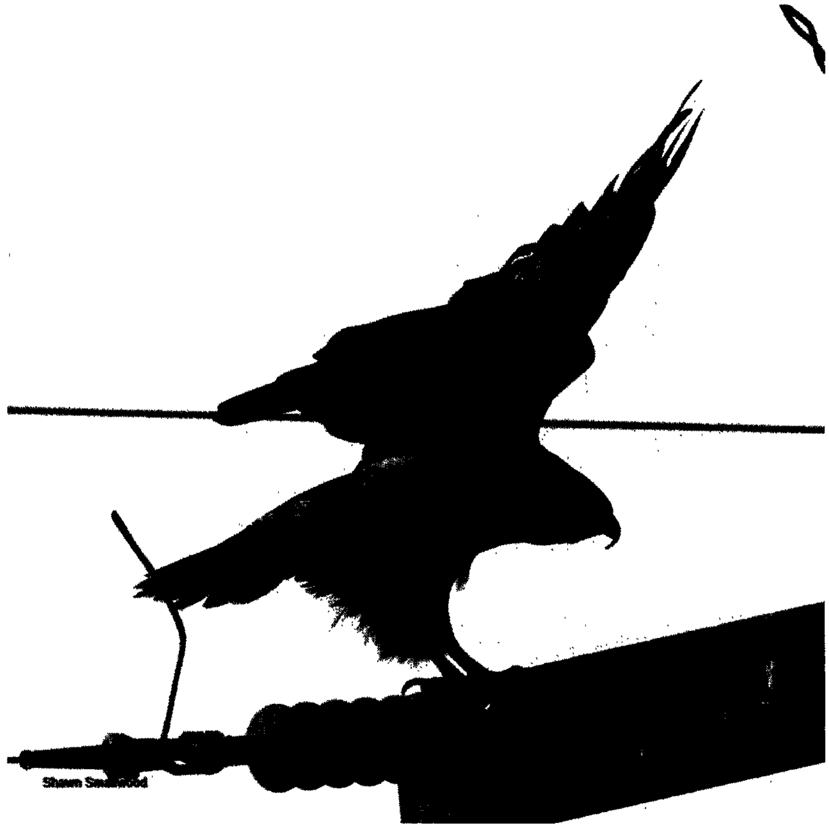
Table 1. *Species of wildlife I observed during 2.55 hours of survey on 21 September 2023.*

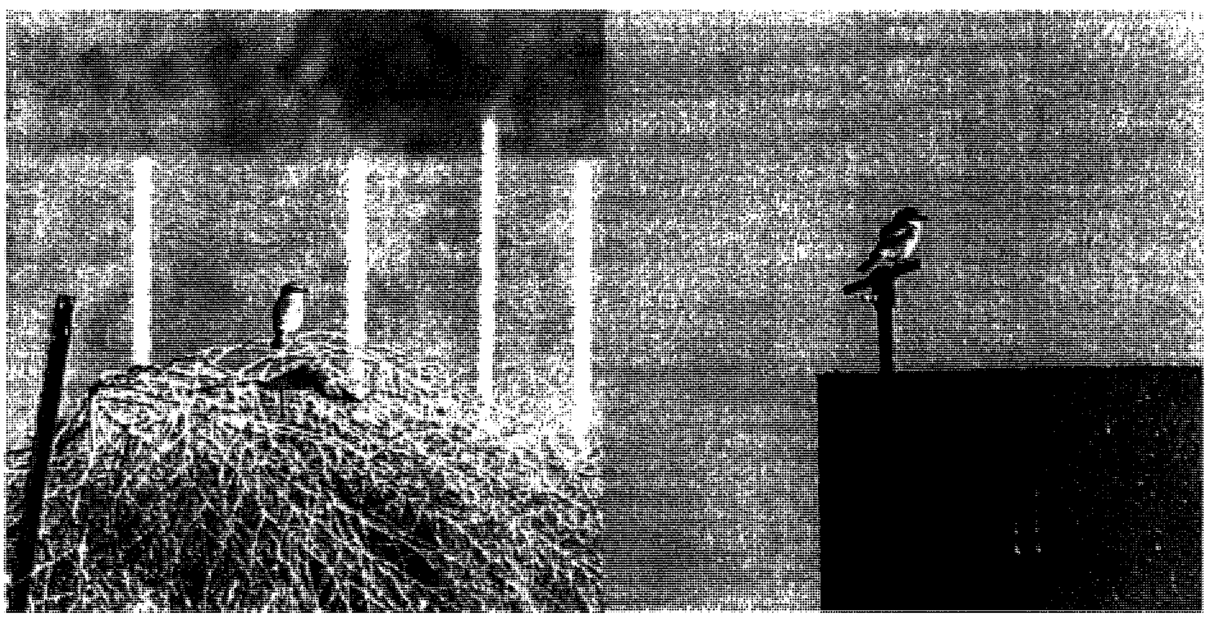
Common name	***Species name***	**Status**[1]	**Notes**
White-throated swift	*Aeronautes saxatalis*		Foraged
Rock pigeon	*Columba livia*	Non-native	Foraged
Eurasian collared-dove	*Streptopelia decaocto*	Non-native	Foraged
Mourning dove	*Zenaida macroura*		Foraged
Killdeer	*Charadrius vociferus*		Foraged
California gull	*Larus californicus*	BCC, TWL	Flyovers
Double-crested cormorant	*Nannopterum auritum*	TWL	Flyover
Snowy egret	*Egretta thula*		Flyover
Turkey vulture	*Cathartes aura*	BOP	Foraged
White-tailed kite	*Elanus leucurus*	CFP, BOP	Called
Cooper's hawk	*Accipiter cooperii*	TWL, BOP	Harassed by kestrels
Swainson's hawk	*Buteo swainsoni*	CT, BOP	Foraged
Red-tailed hawk	*Buteo jamaicensis*	BOP	Foraged
Great horned owl	*Bubo virginianus*	BOP	Pellets
American kestrel	*Falco sparverius*	BOP	Foraged
Black phoebe	*Sayornis nigricans*		Foraged
Say's phoebe	*Sayornis saya*		Foraged
Loggerhead shrike	*Lanius ludovicianus*	SSC2	Foraged
California scrub-jay	*Aphelocoma californica*		Foraged
American crow	*Corvus brachyrhynchos*		Foraged
Horned lark	*Eremophila alpestris*		Flyover
Barn swallow	*Hirundo rustica*		Foraged
American pipit	*Anthus rubescens*		Foraged
Northern mockingbird	*Mimus polyglottos*		Foraged
European starling	*Sturnus vulgaris*	Non-native	Foraged
House finch	*Haemorphous mexicanus*		Foraged
Lesser goldfinch	*Spinus psaltria*		Foraged
Western meadowlark	*Sturnella neglecta*		Foraged
Red-winged blackbird	*Agelaius phoeniceus*		Flyovers
Brewer's blackbird	*Euphagus cyanocephalus*		Foraged
Desert cottontail	*Sylvilagus audubonii*		Tracks
California ground squirrel	*Otospermophilus beecheyi*		
Coyote	*Canis latrans*		
Kangaroo rat	*Dipodomys*		Burrows
Botta's pocket gopher	*Thomomys bottae*		Burrows

[1] Listed as CT = California threatened, CFP = California Fully Protected (CFG Code 3511), SSC2 = California Species of Special Concern priority level 2, BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, TWL = Taxa to Watch List (Shuford and Gardali 2008), and BOP = Birds of Prey (California Fish and Game Code 3503.5).

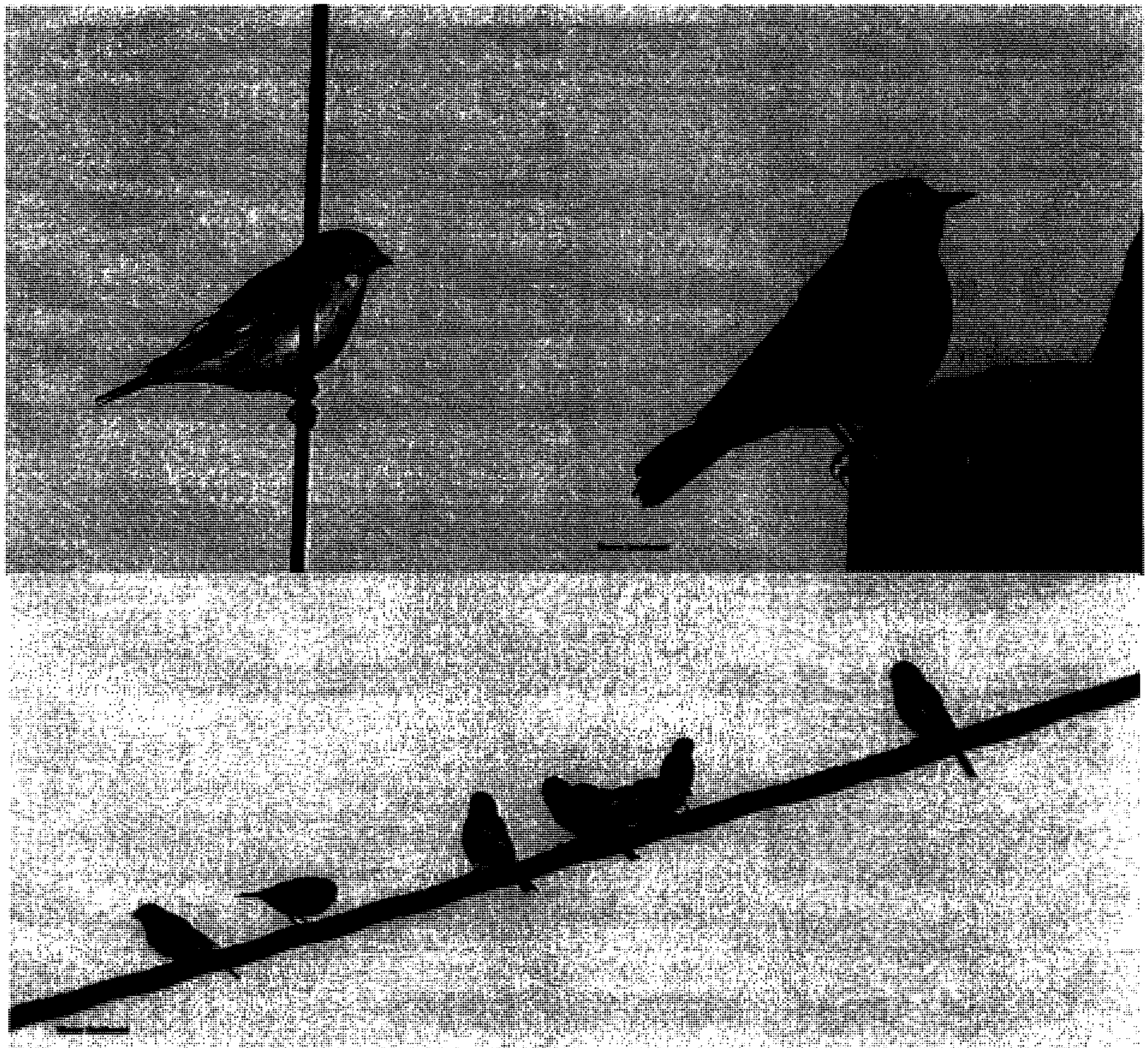
Photo 4. *One of at least three Swainson's hawk foraging on the project site, 21 September 2023.*

Photo 5. *One of two red-tailed hawks on the project site, 21 September 2023, although this photo was taken of the hawk just south of the site.*





Photos 6 and 7. *Loggerhead shrikes on the project site, 21 September 2023. In the left photo, a Say's phoebe is flying in the immediate foreground.*



Photos 8–10. *Lesser goldfinch and Brewer's blackbird (top), and house finches (bottom) on the project site, 21 September 2023.*

Photo 11. *Burrows of California ground squirrel on the project site, 21 September* 2023.

Photos 12. *A California ground squirrel located adjacent to the project site, 21 September 2023.*

What I found at the project site qualifies as an exception to CEQA Guidelines §15183 regarding exemptions to additional environmental review. Considering the site's condition and what I have found at 55 other sites throughout California that were of similar condition, the relatively large number of species I detected, and especially the number of special-status species I detected, should the project go forward as proposed, it would result in impacts peculiar to the parcel on which the project would be located. What I found at the project site is a rate of species' detections that exceeded the 95% confidence interval derived from similar reconnaissance surveys I completed at 55 other sites (Figure 1). The project site is inherently rich in wildlife, especially in special-status species of wildlife.

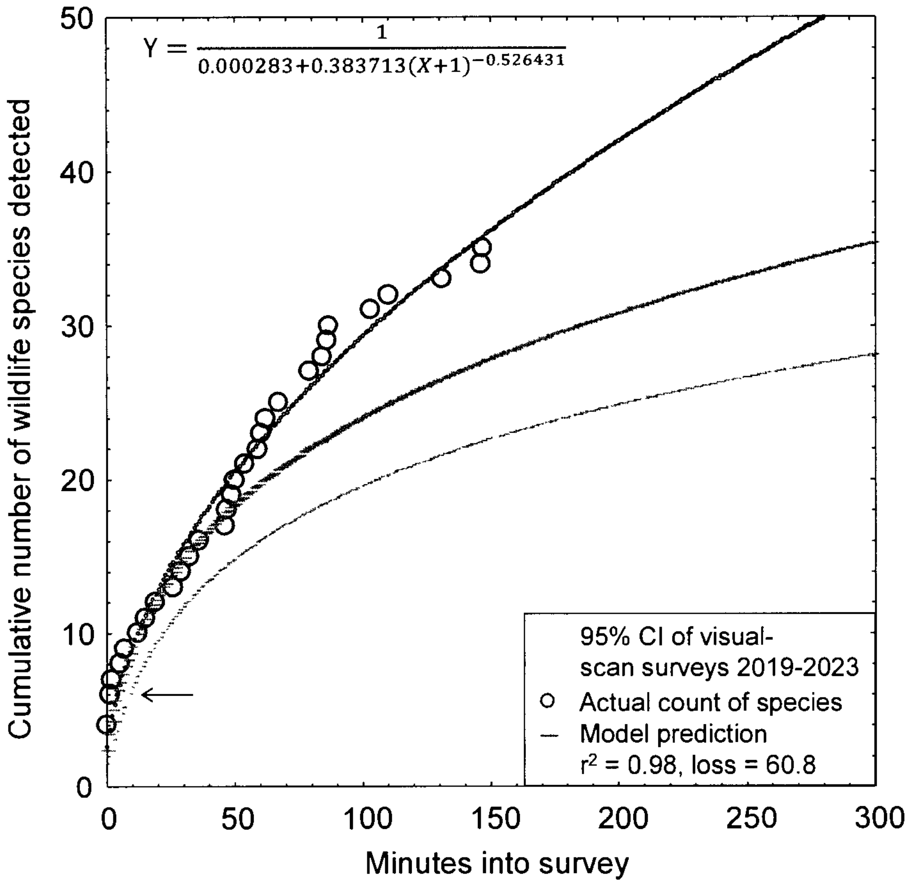


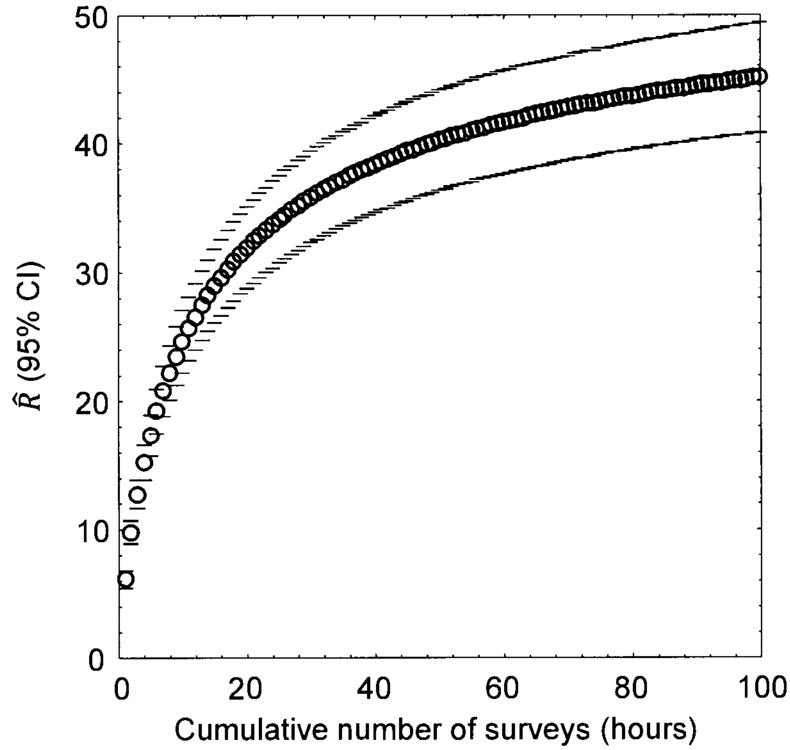
Figure 1. *Actual (circles) and predicted (line) relationship between the number of vertebrate wildlife species detected and the elapsed survey time based on my visual-scan surveys on 21 September 2023, and compared to the 95% CI of 55 surveys I completed at sites proposed for projects throughout California that had similarly been intensively and extensively disturbed in manners to suppress wildlife occurrences. The arrow points to the place on the graph which corresponds with the time it took me to find the same number of vertebrate wildlife species as reportedly detected by Olberding (2021) on 5 May 2021.*

My surveys provide evidence of the project site's exceptional habitat value to wildlife, but additional value can be inferred from my data. Reconnaissance surveys, such as the survey I completed, can be useful for confirming presence of species that were detected, but they can also be useful for estimating the number of species that were not detected. One can model the pattern in species detections during a survey as a means to estimate the number of species that used the site but were undetected during the survey. But whereas this modeling approach is useful for more realistically representing the species richness of the site at the time of a survey, such as in Figure 1, it cannot represent the species richness throughout the year or across multiple years because many species are seasonal or even multi-annual in their movement patterns and in their occupancy of habitat. Multiple surveys are needed to inventory the species that make use of a site over the period of a year or longer.

By use of an analytical bridge, a modeling effort applied to a large, robust data set from a research site can predict the number of vertebrate wildlife species that likely make use of the site over the longer term. As part of my research, I completed a much larger survey effort across 167 km² of annual grasslands of the Altamont Pass Wind Resource Area, where from 2015 through 2019 I performed 721 1-hour visual-scan surveys, or 721 hours of surveys, at 46 stations. I used binoculars and otherwise the methods were the same as the methods I and other consulting biologists use for surveys at proposed project sites. At each of the 46 survey stations, I tallied new species detected with each sequential survey at that station, and then related the cumulative species detected to the hours (number of surveys, as each survey lasted 1 hour) used to accumulate my counts of species detected. I used combined quadratic and simplex methods of estimation in Statistica to estimate least-squares, best-fit nonlinear models of the number of cumulative species detected regressed on hours of survey (number of surveys) at the station: $\hat{R} = \frac{1}{1/a + b \times (Hours)^c}$, where $\hat{R}$ represented cumulative species richness detected. The coefficients of determination, r^2, of the models ranged 0.88 to 1.00, with a mean of 0.97 (95% CI: 0.96, 0.98); or in other words, the models were excellent fits to the data.

I projected the predictions of each model to thousands of hours to find predicted asymptotes of wildlife species richness. The mean model-predicted asymptote of species richness was 57 after 11,857 hours of visual-scan surveys among the 46 stations of my research site. I also averaged model predictions of species richness at each incremental increase of number of surveys, i.e., number of hours (Figure 2). On average I detected 11.2 species over the first 2.55 hours of surveys at my research site in the Altamont Pass (2.55 hours to match the 2.55 hours I surveyed at the project site), which composed 19.65% of the predicted total number of species I would detect with a much larger survey effort at the research site. Given the example illustrated in Figure 2, the 35 species I detected after my 2.55 hours of survey at the project site likely represented 19.65% of the species to be detected after many more visual-scan surveys over another year or longer. With many more repeat surveys through the year, I would likely detect $^{35}/_{0.1965} = 178$ species of vertebrate wildlife at the site. Assuming my ratio of special-status to non-special-status species was to hold through the detections of all 178 predicted species, then continued surveys would eventually detect 51 special-status species of vertebrate wildlife.

Figure 2. *Mean (95% CI) predicted wildlife species richness, $\hat{R}$, as a nonlinear function of hour-long survey increments across 46 visual-scan survey stations across the Altamont Pass Wind Resource Area, Alameda and Contra Costa Counties, 2015–2019. Note that the location of the study is largely irrelevant to the utility of the graph to the interpretation of survey outcomes at the project site. It is the pattern in the data that is relevant, because the pattern is typical of the pattern seen elsewhere.*



Again, however, my prediction of 178 species of vertebrate wildlife, including 51 special-status species of vertebrate wildlife, is derived from daytime visual-scan surveys, and would not detect nocturnal mammals such as bats. The true number of species composing the wildlife community of the site must be larger. A reconnaissance survey should serve only as a starting point toward characterization of a site's wildlife community, but it certainly cannot alone inform of the inventory of species that use the site. More surveys are needed. Nevertheless, the large number of species I predict at the project site is exceptional, and in my experience with many reconnaissance surveys in California, the species richness at the site relative to its level of disturbance is peculiar to the site.

EXISTING ENVIRNMENTAL SETTING

The first step in analysis of potential project impacts to biological resources is to accurately characterize the existing environmental setting, including the biological species that use the site, their relative abundances, how they use the site, key ecological relationships, and known and ongoing threats to those species with special status. A reasonably accurate characterization of the environmental setting can provide the basis for determining whether the site holds habitat value to wildlife, as well as a baseline against which to analyze potential project impacts. For these reasons, characterization of the environmental setting, including the project site's regional setting, is one of CEQA's essential analytical steps. Methods to achieve this first step typically include (1) surveys of the site for biological resources, and (2) reviews of literature, databases and local experts for documented occurrences of special-status species. In the case of the proposed project, these needed steps were grossly inadequate.

Environmental Setting informed by Field Surveys

To CEQA's primary objective to disclose potential environmental impacts of a proposed project, the analysis should be informed of which biological species are known to occur at the proposed project site, which special-status species are likely to occur, as well as the limitations of the survey effort directed to the site. Analysts need this information to characterize the environmental setting as a basis for opining on, or predicting, potential project impacts to biological resources.

Olberding (2021) incompletely reports on the reconnaissance survey that was completed at the project site. Although the survey date is reported (5 May 2021), Olberding (2021) does not report what time of day the survey began, nor the survey's duration. These are critical omissions that prevent the reader from understanding the survey outcome.

Olberding (2021) did not achieve the minimum standards for reconnaissance survey directed toward plants (CDFW 2018). Olberding's (2021) conclusions regarding the unlikely occurrences of special-status species of plants therefore lack adequate foundation in survey.

The findings of the Olberding (2021) are largely unreliable. Olberding (2021) managed to detect only six species of vertebrate wildlife, which is the number of vertebrate wildlife species I detected within two minutes from the start of my survey on 21 September 2023 (see the arrow in Figure 1). After 2.55 hours, I detected nearly six times the number of species of vertebrate wildlife as did Olberding (2021), and the pattern in the data indicate I would have detected many more species had I continued the survey (Figure 1). Whereas Olberding (2021) saw three special-status species, I saw ten of them. Olberding (2021) missed the great horned owl pellets that I found under nearly every span of electric distribution lines. Olberding (2021) missed the kangaroo rat burrow systems, and the Botta's pocket gopher burrow systems, both types of burrows of which are readily visible. Furthermore, Olberding (2021) saw no bird smaller than a white-tailed kite, whereas I saw 22 such species. Perhaps because the survey was too brief of for some other reason, Olberding (2021) saw and reported few of the vertebrate wildlife species that occur on the project site.

No surveys were completed for bats. Nor were any protocol-level detection surveys completed for special-status species despite known occurrences in the project area. No detection surveys were completed for burrowing owl and Swainson's hawk (I saw three on site). Swainson's hawks nested on a tree just across Dos Reis Road on the south side of the project site in 2021 (Olberding 2021) and probably again in 2023, based on my observations. And because ground squirrels occur on and around the project site, there is a reasonable likelihood that burrowing owls also occur on the site. Protocol-level detection surveys are available for these species (CDFW 2010, 2012), and should be implemented.

Olberding (2021) fails to accurately inform the Checklist of the wildlife community that is part of the existing environmental setting. Olberding's (2021) reporting was deficient, and the surveys were grossly incomplete and unreliable.

Environmental Setting informed by Desktop Review

The purpose of literature and database review and of consulting with local experts is to inform the reconnaissance survey, to augment interpretation of its outcome, and to help determine which protocol-level detection surveys should be implemented. Analysts need this information to identify which species are known to have occurred at or near the project site, and to identify which other special-status species could conceivably occur at the site due to geographic range overlap and site conditions. This step is important because the reconnaissance survey is not going to detect all of the species of wildlife that make use of the site over a period of a year or longer. This step can identity those species yet to be detected at the site but which have been documented to occur nearby or whose available habitat associations are consistent with site conditions. Some special-status species can be ruled out of further analysis, but only if compelling evidence is available in support of such determinations.

Olberding (2021) provides an inadequate database or desktop review. The desktop review neglects iNaturalist and eBird as data sources. It provides no evidence that local experts were consulted for knowledge of occurrences of special-status species in the project area. The methodology for selecting special-status species for analysis of occurrence likelihoods was flawed (see below).

By including in the species' likelihood of occurrence analysis only species whose documented occurrences within the nearest CNDDB quadrangles, Olberding (2021) screens out many special-status species from further consideration in the characterization of the wildlife community as part of the baseline environmental setting. CNDDB is not designed to support absence determinations or to screen out species from characterization of a site's wildlife community. As noted by CNDDB, "*The CNDDB is a positive sighting database. It does not predict where something may be found. We map occurrences only where we have documentation that the species was found at the site. There are many areas of the state where no surveys have been conducted and therefore there is nothing on the map. That does not mean that there are no special status species present.*" Olberding (2021) misuses CNDDB.

CNDDB relies entirely on volunteer reporting from biologists who were allowed access to whatever properties they report from. Many properties have never been surveyed by biologists. Many properties have been surveyed, but the survey outcomes never reported to CNDDB. Many properties have been surveyed multiple times, but not all survey outcomes reported to CNDDB. Furthermore, CNDDB is interested only in the findings of special-status species, which means that species more recently assigned special status will have been reported many fewer times to CNDDB than were species assigned special status since the inception of CNDDB. The lack of many CNDDB records for species recently assigned special status had nothing to do with whether the species' geographic ranges overlapped the project site, but rather more to do with the brief time for records to have accumulated since the species were assigned special status. And because negative findings are not reported to CNDDB, CNDDB cannot provide the basis for estimating occurrence likelihoods, either.

In my assessment based on database reviews and site visits, 107 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential (Table 2). Of these 107 species, 10 (9%) were recorded on site, and another 22 (21%) species have been documented within 1.5 miles of the site ('Very close'), another 19 (18%) within 1.5 and 4 miles ('Nearby'), and another 46 (43%) within 4 to 30 miles ('In region'). Nearly half (48%) of the species in Table 2 have been reportedly seen within 4 miles of the project site. The site therefore supports multiple special-status species of wildlife and carries the potential for supporting many more special-status species of wildlife based on proximity of recorded occurrences.

Because the project would attempt to mitigate its impacts to wildlife by participating with the SJMSCP, it is important to analyze the occurrence likelihoods of SJMSCP-covered species. Of the 107 special-status species in Table 2, 36 (34%) are covered by the SJMSCP, including 5 that I observed on the project site, 10 with known occurrences very close, 7 nearby, and 10 in the region. Of the 36 SJMSCP-covered species, the occurrence likelihoods of only 12 are analyzed by Olberding (2021), including 2 that Olberding (2021) observed on site, and determinations by Olberding (2021) that 1 may occur on site, 3 are unlikely, and 6 are presumed absent. In summary, only a third of the special-status species in Table 2 are covered by the SJMSCP, 67% of which have been recorded within 4 miles of the project site, and only 33% of which have been analyzed in support of the Checklist.

Because the project would attempt to mitigate its impacts to wildlife by participating with the SJMSCP, it is also important to analyze the occurrence likelihoods of special-status species that are not covered by the SJMSCP. In fact, for these species, it is even more important to analyze their occurrence likelihoods because the mitigation of the SJMSCP was not formulated with these species in mind. Of the 107 special-status species that are listed in Table 2, 71 (66%) are not covered by the SJMSCP, including 5 that I observed on site, and occurrence records of 12 that are very close, 12 nearby, and 36 in the region. Of 71 the special-status species in table 2 that not covered by the SJMSCP, Olberding (2021) analyzes the occurrence likelihoods of only 8 (11%), including of none that I observed on site, and determinations by Olberding (2021) of 2 as unlikely and 6 as presumed absent. Of the latter 6 species Olberding (2021) presumed absent, 2 have been recorded very close to the project site (yellow-headed blackbird and Modesto song sparrow only 0.46 miles away). In summary, two-thirds of the special-status species in Table 2 are not covered by the SJMSCP, 29 (41%) of which have been recorded within 4 miles of the project site, and only 8 (11%) of which have been analyzed in support of the Checklist. Except for my own assessments in Table 2, the Checklist is grossly inadequate in its characterization of that part of the wildlife community that lacks coverage under the SJMSCP.

Table 2. *Occurrence likelihoods of special-status bird species at or near the proposed project site, according to eBird/iNaturalist records (https://eBird.org, https://www.inaturalist.org) and on-site survey findings, where 'Very close' indicates within 1.5 miles of the site, "nearby" indicates within 1.5 and 4 miles, and "in region" indicates within 4 and 30 miles, and 'in range' means the species' geographic range overlaps the site. Records in bold font indicate those species I detected.*

Common name	***Species name***	**Status[1]**	**SJMSCP covered species**	**Checklist occurrence potential**	**Databased, Site visits**
Valley elderberry longhorn beetle	*Desmocerus californicus dimorphus*	FT	Yes	May occur	In range
Monarch	*Danaus plexippus*	FC			Nearby
Crotch's bumble bee	*Bombus crotchii*	CCE		Absent	In region
Western bumble bee	*Bombus o. occidentalis*	CCE		Absent	In range
California tiger salamander	*Ambystoma californiense*	FT, CT, WL	Yes	Absent	In region
Western spadefoot	*Spea hammondii*	SSC	Yes	Absent	In region
Western pond turtle	*Emys marmorata*	SSC	Yes	Absent	Nearby
California glossy snake	*Arizona elegans occidentalis*	SSC		Unlikely	In region
San Joaquin coachwhip	*Masticophis flagellum ruddocki*	SSC	Yes	Unlikely	In region
Giant gartersnake	*Thamnophis gigas*	FT, CT	Yes	Absent	In region
Brant	*Branta bernicla*	SSC2			In region
Cackling goose (Aleutian)	*Branta hutchinsii leucopareia*	WL	Yes		Nearby
Redhead	*Aythya americana*	SSC2			Nearby
Harlequin duck	*Histrionicus histrionicus*	SSC2			In region
Barrow's goldeneye	*Bucephala islandica*	SSC			Nearby
Western grebe	*Aechmophorus occidentalis*	BCC	Yes		Nearby
Clark's grebe	*Aechmophorus clarkii*	BCC			Nearby
Black swift	*Cypseloides niger*	SSC3, BCC			In region
Vaux's swift	*Chaetura vauxi*	SSC2, BCC			In region
Costa's hummingbird	*Calypte costae*	BCC			In region
Rufous hummingbird	*Selasphorus rufus*	BCC			In region
Allen's hummingbird	*Selasphorus sasin*	BCC			In region
Lesser sandhill crane	*Antigone canadensis canadensis*	SSC3			In region
Greater sandhill crane	*Antigone canadensis tabida*	CT, FP	Yes		In region
American avocet[2]	*Recurvirostra americana*	BCC			Very close

Common name	*Species name*	Status[1]	SJMSCP covered species	Checklist occurrence potential	Databased, Site visits
Mountain plover	*Charadrius montanus*	SSC2, BCC	Yes		In region
Snowy plover	*Charadrius nivosus*	BCC			In region
Whimbrel[2]	*Numenius phaeopus*	BCC			Nearby
Long-billed curlew	*Numenius americanus*	WL	Yes		Very close
Marbled godwit	*Limosa fedoa*	BCC			In region
Red knot (Pacific)	*Calidris canutus*	BCC			In region
Short-billed dowitcher	*Limnodromus griseus*	BCC			Nearby
Willet	*Tringa semipalmata*	BCC			Very close
Laughing gull	*Leucophaeus atricilla*	WL			In region
Western gull	*Larus occidentalis*	BCC			In region
California gull	*Larus californicus*	BCC, WL			**On site**
California least tern	*Sternula antillarum browni*	FE, CE, FP			In region
Black tern	*Chlidonias niger*	SSC2, BCC			In region
Common loon	*Gavia immer*	SSC			Nearby
Double-crested cormorant	*Phalacrocorax auritus*	WL	Yes		**On site**
American white pelican	*Pelacanus erythrorhynchos*	SSC1, BCC	Yes		Very close
California brown pelican	*Pelecanus occidentalis californicus*	FP			In region
Least bittern	*Ixobrychus exilis*	SSC2			In region
White-faced ibis	*Plegadis chihi*	WL	Yes		Very close
Turkey vulture	*Cathartes aura*	BOP			**On site**
Osprey	*Pandion haliaetus*	WL, BOP	Yes		Very close
White-tailed kite	*Elanus luecurus*	CFP, BOP	Yes	Observed	**On site**
Golden eagle	*Aquila chrysaetos*	BGEPA, CFP, BOP, WL	Yes		Very close
Northern harrier	*Circus cyaneus*	BCC, SSC3, BOP	Yes		Very close
Sharp-shinned hawk	*Accipiter striatus*	WL, BOP	Yes		Very close
Cooper's hawk	*Accipiter cooperii*	WL, BOP	Yes		**On site**
Bald eagle	*Haliaeetus leucocephalus*	CE, BGEPA, CFP			Nearby
Red-shouldered hawk	*Buteo lineatus*	BOP			Very close
Swainson's hawk	*Buteo swainsoni*	CT, BOP	Yes	Observed	**On site**

Common name	*Species name*	Status[1]	SJMSCP covered species	Checklist occurrence potential	Databased, Site visits
Red-tailed hawk	*Buteo jamaicensis*	BOP			**On site**
Ferruginous hawk	*Buteo regalis*	WL, BOP	Yes		Nearby
Rough-legged hawk	*Buteo lagopus*	BOP			Nearby
Barn owl	*Tyto alba*	BOP			Very close
Western screech-owl	*Megascops kennicotti*	BOP			In region
Great horned owl	*Bubo virginianus*	BOP			**On site**
Burrowing owl	*Athene cunicularia*	BCC, SSC2, BOP	Yes	Unlikely	Very close
Long-eared owl	*Asio otus*	BCC, SSC3, BOP			In region
Short-eared owl	*Asia flammeus*	BCC, SSC3, BOP	Yes		In region
Lewis's woodpecker	*Melanerpes lewis*	BCC			In region
Nuttall's woodpecker	*Picoides nuttallii*	BCC			Very close
American kestrel	*Falco sparverius*	BOP			**On site**
Merlin	*Falco columbarius*	WL, BOP	Yes		Nearby
Peregrine falcon	*Falco peregrinus*	BOP			Very close
Prairie falcon	*Falco mexicanus*	WL, BOP	Yes		Nearby
Olive-sided flycatcher	*Contopus cooperi*	BCC, SSC2			Nearby
Willow flycatcher	*Empidonax trailii*	CE			Nearby
Vermilion flycatcher	*Pyrocephalus rubinus*	SSC2			In region
Least Bell's vireo	*Vireo bellii pusillus*	FE, CE		Absent	In region
Loggerhead shrike	*Lanius ludovicianus*	SSC2	Yes	Unlikely	**On site**
Yellow-billed magpie	*Pica nuttalli*	BCC			Very close
Oak titmouse	*Baeolophus inornatus*	BCC			Very close
Bank swallow	*Riparia riparia*	CT	Yes		In region
Purple martin	*Progne subis*	SSC2			In region
Wrentit	*Chamaea fasciata*	BCC			In region
California thrasher	*Toxostoma redivivum*	BCC			Nearby
Cassin's finch	*Haemorhous cassinii*	BCC			In region
Lawrence's goldfinch	*Spinus lawrencei*	BCC			Very close
Grasshopper sparrow	*Ammodramus savannarum*	SSC2			In region
Modesto song sparrow[3]	*Melospiza melodia mailliardi*	SSC3		Absent	Very close

Common name	Species name	Status[1]	SJMSCP covered species	Checklist occurrence potential	Databased, Site visits
Black-chinned sparrow	*Spizella atrogularis*	BCC			In region
Bell's sparrow	*Amphispiza b. belli*	WL	Yes		In region
Oregon vesper sparrow	*Pooecetes gramineus affinis*	SSC2, BCC			In range
Yellow-breasted chat	*Icteria virens*	SSC3	Yes		Nearby
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*	SSC3		Absent	Very close
Bullock's oriole	*Icterus bullockii*	BCC			Very close
Tricolored blackbird	*Agelaius tricolor*	CT, BCC, SSC1	Yes	Absent	Very close
Lucy's warbler	*Leiothlypis luciae*	SSC3, BCC			In region
Virginia's warbler	*Leiothlypis virginiae*	WL, BCC			In region
Yellow warbler	*Setophaga petechia*	SSC2	Yes		Very close
Summer tanager	*Piranga rubra*	SSC1			In region
Pallid bat	*Antrozous pallidus*	SSC, WBWG:H		Unlikely	In range
Townsend's big-eared bat	*Corynorhinus townsendii*	SSC, WBWG:H	Yes	Absent	In range
Canyon bat	*Parastrellus hesperus*	WBWG:L			In region
Big brown bat	*Episticus fuscus*	WBWG:L			In range
Silver-haired bat	*Lasionycteris noctivagans*	WBWG:M			In range
Western red bat	*Lasiurus blossevillii*	SSC, WBWG:H	Yes		In region
Hoary bat	*Lasiurus cinereus*	WBWG:M			In region
Western small-footed myotis	*Myotis cililabrum*	WBWG:M	Yes		In range
Little brown myotis	*Myotis lucifugus*	WBWG:M			In region
Yuma myotis	*Myotis yumanensis*	WBWG:LM	Yes		In range
California myotis	*Myotis californicus*	WBWG:L			In range
American badger	*Taxidea taxus*	SSC		Absent	In region

[1] Listed as FT or FE = federal threatened or endangered, FC = federal candidate for listing, BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, CT or CE = California threatened or endangered, CCT or CCE = Candidate California threatened or endangered, CFP = California Fully Protected (California Fish and Game Code 3511), SSC = California Species of Special Concern (not threatened with extinction, but rare, very restricted in range, declining throughout range, peripheral portion of species' range, associated with habitat that is declining in extent), SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively (Shuford and Gardali 2008), WL = Taxa to Watch List (Shuford and Gardali 2008),

and BOP = Birds of Prey (CFG Code 3503.5), and WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H).

[2] Uncertain if BCC based on 2021 Bird of Conservation Concern list.

[3] Reported simply as song sparrow, but song sparrows in this area should be Modesto song sparrow.

Habitat Assessment

Olberding (2021) speculates that "Due to the heavily disturbed nature of the Property there were a limited number of wildlife species observed during the survey." However, the heavy disturbance was much less limiting to the number of wildlife species that I detected on the project site, as I found nearly 6 times the number reported by Olberding (2021). This noted, the project site has been intensively disturbed over a number of years, and this level of disturbance undoubtedly diminished the species of wildlife species that occur on the site as compared to times preceding the repeated discing of the site. Nevertheless, wildlife strive to survive, even where conditions are far from ideal. Some species often fare better on disturbed soils. Horned larks and killdeer are perfectly capable of nesting on the ground of the project site. American pipits, American crows, house finches and red-winged blackbirds often forage on disced soil, and these birds are in turn pursued by Swainson's hawks, Cooper's hawks and white-tailed kites, among others. Swainson's hawks are known for foraging over disturbed fields, especially as the fields are being disturbed by activities such as discing (Smallwood 1995, Smallwood et al. 1996, Swolgaard et al. 2008). Swainson's hawks nested adjacent to the project site for good reasons. The disturbance of a site is no justification for dismissing it as valuable to wildlife (Smallwood and Smallwood 2023).

For multiple species, Olberding (2021) speculates that the project site is unsuitable as nesting habitat and therefore is unlikely to cause significant impacts if it is developed. However, there is no sound scientific distinction between nesting habitat and some other characterization of habitat. For any given species, the environment of a site is either habitat or it is not, as habitat is defined as that part of the environment that is used by a species (Hall et al. 1997). Certain portions of a species' habitat may provide nesting opportunities, but all parts of its habitat are critical to the nesting success of members of the species. If an animal cannot find sufficient forage and cover during non-nesting season or at portions of its habitat where it does not normally nest, then it might not survive to reproduce or its nesting attempt might not succeed. Olberding (2021) asserts a false distinction of the value of a site based on whether the species nests on-site.

The above-arguments were applied to loggerhead shrike, which serves as a good example of how poorly predictive the Olberding's (2021) approach is to determining occurrence likelihood. Olberding (2021) determines loggerhead shrike to have a low likelihood of occurrence due to lack of trees and shrubs needed for nesting. However, loggerhead shrikes are resourceful when it comes to finding and using nest substrate (Smallwood and Smallwood 2021). Furthermore, elderberry shrubs occur on the project site (Photo 3) as do loggerhead shrikes (Table 1, Photos 6 and 7). When I arrived at the project site to perform my survey, I expected to see loggerhead shrikes, based on my experience. The occurrence likelihood of loggerhead shrike was not low, and the same can be concluded for many of the other special-status species considered by Olberding (2021).

POTENTIAL BIOLOGICAL IMPACTS

An impacts analysis should consider whether and how a proposed project would affect members of a species, larger demographic units of the species, the whole of a species, and ecological communities. The accuracy of this analysis depends on an accurate characterization of the existing environmental setting. In the case of the proposed project, the existing environmental setting has not been accurately characterized, and several important types of potential project impact have not been analyzed. These types of impacts include habitat loss, interference with wildlife movement, and collision mortality with solar PV panels and project-generated traffic.

HABITAT LOSS

The project would destroy 89.92 acres of habitat to every species of wildlife that makes use of the project site. My survey outcomes interpreted with the help of an analytical bridge to more extensive research at another site in a similar environment predict 178 species of vertebrate wildlife would eventually be detected by repeat visual-scan surveys similar those I completed. Added to these 178 species would be all the nocturnal species I would unlikely detect during the daytime, such as species of bat, multiple species of small mammal, American badger and perhaps San Joaquin kit fox. What remains without analysis is the magnitude of loss of the numbers of animals that can be produced by the project site.

In the case of birds, two methods exist for estimating the loss of productive capacity that would be caused by the project. One method would involve surveys to count the number of bird nests and chicks produced. The alternative method is to infer productive capacity from estimates of total nest density elsewhere. I am aware of estimates of total nest density elsewhere, but none were on fields that underwent discing every year except for a field I surveyed for total nest density this past spring. The field had been a walnut orchard in Rancho Cordova, California, but the walnuts were abandoned while the floor continued to be disced, sometimes entirely and sometimes partially. I surveyed the 12.74-acre study site 30 times from March through the first half of August to estimate total nest density. Total nest density of birds was 14.38 nests per acre, but this density included cavity nests and tree-supported cup nests within the scattering of abandoned orchard walnuts. Excluding the cavity nests and tree-supported cup nests, total nest density on the ground and in elderberry shrubs was 2.12 nests/acre. Assuming that the estimates of total bird nest density on the ground and in elderberry was similar between my study site and the project site, then the project site likely supports 191 nests per year.

The loss of 191 nest sites of birds would qualify as a potentially significant project impact, but the impact does not end with the immediate loss of nest sites as nest substrate is removed and foraging grounds graded in preparation for impervious surfaces. The reproductive capacity of the site would be lost. The average number of fledglings per nest in Young's (1948) study was 2.9. Assuming Young's (1948) study site typifies bird productivity, the project would prevent the production of 554 fledglings per year. Assuming an average bird generation time of 5 years, the lost capacity of both breeders and annual fledgling production can be estimated from an equation in

Smallwood (2022): {(nests/year × chicks/nest × number of years) + (2 adults/nest × nests/year) × (number of years ÷ years/generation)} ÷ (number of years) = 630 birds per year denied to California. In the face of a potential project impact of this magnitude, I conclude that the potential project impacts to the productive capacity of birds would be significant.

INTERFERENCE WITH WILDLIVE MOVEMENT

The analysis of whether the project would interfere with wildlife movement in the regio is flawed and misleading. According to the Checklist, "The Biological Resources Analysis Report (Attachment A) [Olberding 2021] included a CNDDB record search that did not reveal any documented wildlife corridors or wildlife nursery sites on or adjacent to warehouse site." However, CNDDB is not where an analyst would find information relevant to whether a site is important to wildlife movement. Nor did Olberding (2021) address the issue of wildlife movement in the region. In effect, there is no analysis of whether the project would interfere with wildlife movement.

The Checklist also claims that the impact on wildlife movement corridors was adequately addressed in the General Plan EIR. Indeed, the General Plan EIR addresses wildlife movement corridors, but it does so with a focus on the San Joaquin River as a wildlife corridor, and it does so with a focus solely on the functionality of corridors. The General Plan EIR implies the premise that interference with wildlife movement in the region can result only from a project's disruption of the function of a wildlife movement corridor. This premise represents a false CEQA standard, and was therefore inappropriate to the analysis. The primary phrase of the CEQA standard goes to wildlife movement regardless of whether the movement is channeled by a corridor. A site such as the project site is critically important for wildlife movement because it composes an increasingly diminishing area of open space within a growing expanse of anthropogenic uses, forcing more species of volant wildlife to use the site for stopover and staging during migration, dispersal, and home range patrol (Warnock 2010, Taylor et al. 2011, Runge et al. 2014).

In any case, many of the animals I saw on the project site got there by moving there from someplace else, and others were using the airspace of the site as a travel medium. California gulls flew across the site, as did snowy egrets, double-crested cormorants, mourning doves, horned larks and many other birds. To and from the project site, pocket gophers disperse along linear elements of the landscape (Smallwood et al. 2001), and so do kangaroo rats; otherwise, these species would have been extirpated from the site long ago due to the discing. The project site includes grassland patches to and from which many species of wildlife are compelled to travel, and the majority of the site in disturbed soil likely serves as an island of open space in the winter months for stopover by mountain plovers, merlin, ferruginous hawks and many other special-status species.

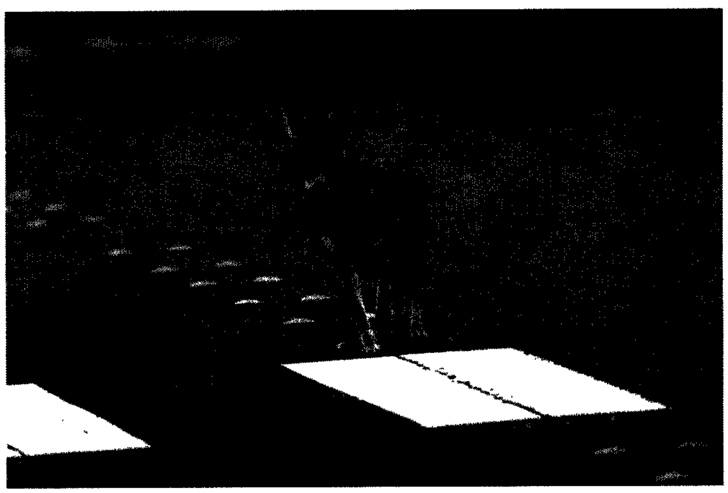
The Checklist fails to analyze whether and to what degree the project's 60-foot-tall building and adjoining impervious surface covering nearly 90 acres would interfere with wildlife movement in the region, and whether the resulting impacts could be mitigated.

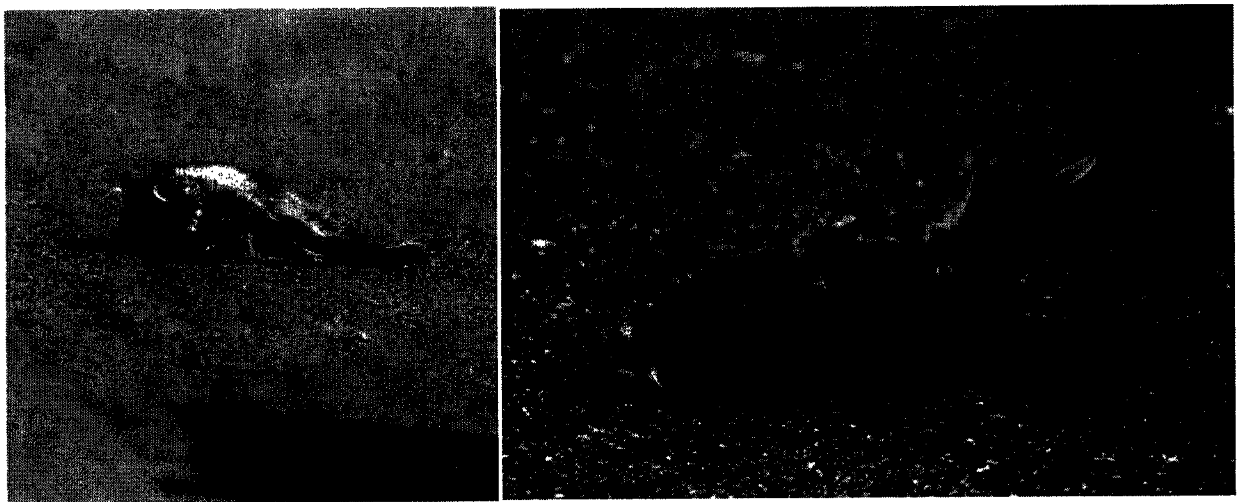
TRAFFIC IMPACTS TO WILDLIFE

For the following reasons, the project would qualify as an exception to CEQA Guidelines §15183 regarding exemptions to additional environmental review: 1) project-generated traffic impacts to wildlife were mentioned as a bullet item but not analyzed as significant effects in the Lathrop General Plan EIR, and 2) the project-generated traffic impacts to wildlife would be potentially significant off-site and they would contribute cumulatively to traffic impacts to wildlife impacts generated by other projects in the region, and which were not discussed in the Lathrop General Plan EIR. The Lathrop General Plan EIR's only mention of traffic impacts to wildlife was "Significant impacts on special status species associated with individual subsequent projects could include: increased mortality caused by higher numbers of automobiles in new areas of development." This is a statement, but not an analysis, and it was followed by no policies or actions to minimize the impacts.

The Checklist fails to address one of the project's most obvious, substantial impacts to wildlife, and that is wildlife mortality and injuries caused by project-generated traffic. Project-generated traffic would endanger wildlife that must, for various reasons, cross roads used by the project's traffic (Photos 13–15), including along roads far from the project footprint. Vehicle collisions have accounted for the deaths of many thousands of amphibian, reptile, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level (Forman et al. 2003). Across North America traffic impacts have taken devastating tolls on wildlife (Forman et al. 2003). In Canada, 3,562 birds were estimated killed per 100 km of road per year (Bishop and Brogan 2013), and the US estimate of avian mortality on roads is 2,200 to 8,405 deaths per 100 km per year, or 89 million to 340 million total per year (Loss et al. 2014). Local impacts can be more intense than nationally.

Photo 13. *A coyote uses the crosswalk to crosses a road on 2 February 2023.*





Photos 14 and 15. *Raccoon killed on Road 31 just east of Highway 505 in Solano County (left; photo taken on 10 November 2018), and mourning dove killed by vehicle on a California road (right; photo by Noriko Smallwood, 21 June 2020.)*

The nearest study of traffic-caused wildlife mortality was performed along a 2.5-mile stretch of Vasco Road o9nly 20 miles away in Contra Costa County, California. Fatality searches in this study found 1,275 carcasses of 49 species of mammals, birds, amphibians and reptiles over 15 months of searches (Mendelsohn et al. 2009). This fatality number needs to be adjusted for the proportion of fatalities that were not found due to scavenger removal and searcher error. This adjustment is typically made by placing carcasses for searchers to find (or not find) during their routine periodic fatality searches. This step was not taken at Vasco Road (Mendelsohn et al. 2009), but it was taken as part of another study next to Vasco Road (Brown et al. 2016). Brown et al.'s (2016) adjustment factors for carcass persistence resembled those of Santos et al. (2011). Also applying searcher detection rates from Brown et al. (2016), the adjusted total number of fatalities was estimated at 12,187 animals killed by traffic on the road. This fatality number over 1.25 years and 2.5 miles of road translates to 3,900 wild animals per mile per year. In terms comparable to the national estimates, the estimates from the Mendelsohn et al. (2009) study would translate to 243,740 animals killed per 100 km of road per year, or 29 times that of Loss et al.'s (2014) upper bound estimate and 68 times the Canadian estimate. An analysis is needed of whether increased traffic generated by the project site would similarly result in local impacts on wildlife.

For wildlife vulnerable to front-end collisions and crushing under tires, road mortality can be predicted from the study of Mendelsohn et al. (2009) as a basis, although it would be helpful to have the availability of more studies like that of Mendelsohn et al. (2009) at additional locations. My analysis of the Mendelsohn et al. (2009) data resulted in an estimated 3,900 animals killed per mile along a county road in Contra Costa County. Two percent of the estimated number of fatalities were birds, and the balance was composed of 34% mammals (many mice and pocket mice, but also ground squirrels, desert cottontails, striped skunks, American badgers, raccoons, and others), 52.3% amphibians (large numbers of California tiger salamanders and California red-legged frogs, but also Sierran treefrogs, western toads, arboreal salamanders, slender salamanders and others), and 11.7% reptiles (many western fence lizards, but also skinks, alligator lizards, and snakes of various species). VMT is useful for predicting wildlife mortality because I was able to quantify miles traveled along the studied reach of Vasco Road during the time period of the Mendelsohn et al. (2009), hence enabling a rate of fatalities per VMT that can be projected to other sites, assuming similar collision fatality rates.

Predicting project-generated traffic impacts to wildlife

The Checklist predicts 2,798 daily tips among 1,295 employees and a mean 15.43 daily VMT per employee. Assuming the daily trips are weekdays, the annual VMT not including weekend mileage would amount to 11,225,016 annual VMT. During the Mendelsohn et al. (2009) study, 19,500 cars traveled Vasco Road daily, so the vehicle miles that contributed to my estimate of non-volant fatalities was 19,500 cars and trucks × 2.5 miles × 365 days/year × 1.25 years = 22,242,187.5 vehicle miles per 12,187 wildlife fatalities, or 1,825 vehicle miles per fatality. This rate divided into the predicted annual VMT would predict 6,151 vertebrate wildlife fatalities per year. Even if the mortality turns out to be as low as half that of the Mendelsohn et al. (2009) study, the annual death toll to wildlife resulting from project-generated traffic would be 3,075, which would also qualify as a significant, unmitigated impact to wildlife caused by the project.

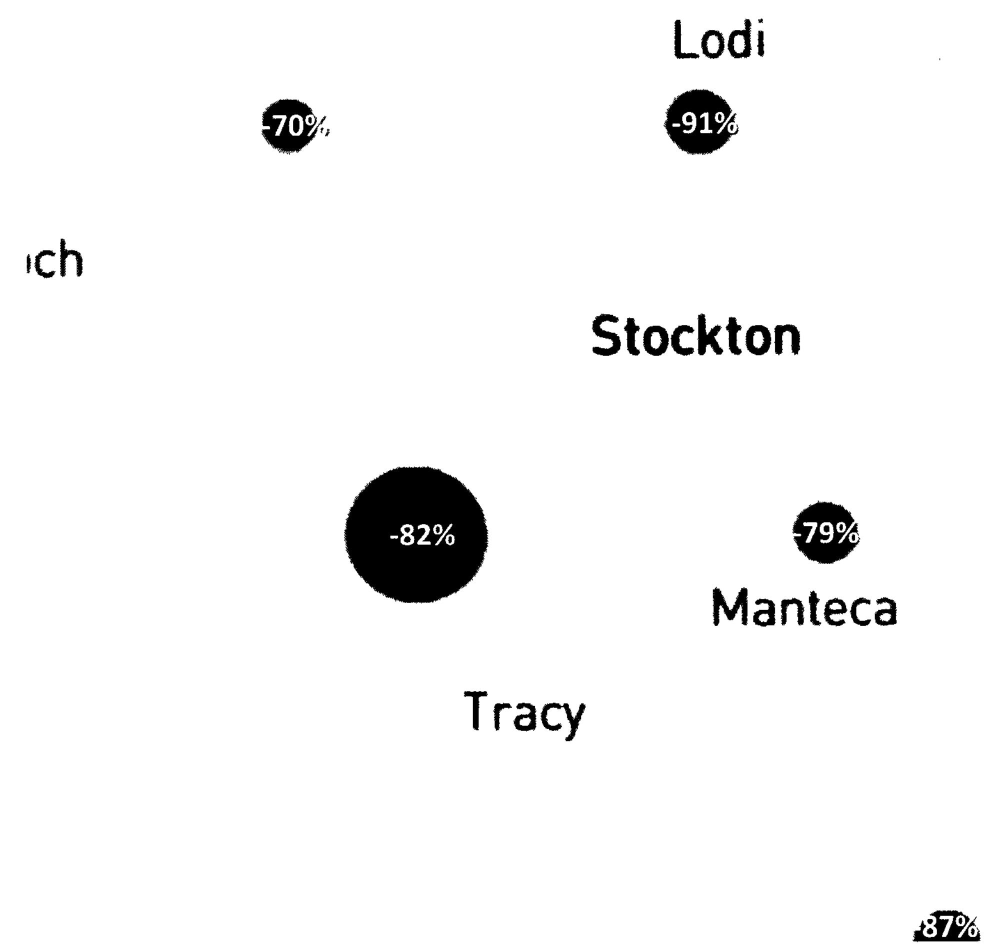
Based on my indicator-level analysis, the project-generated traffic would cause substantial, significant impacts to wildlife. The Checklist does not address this potential impact, let alone propose to mitigate it. Mitigation measures to improve wildlife safety along roads are available and are feasible, and they need exploration for their suitability with the proposed project. Given the predicted level of project-generated traffic-caused mortality, and the lack of any proposed mitigation, it is my opinion that the proposed project would result in potentially significant adverse biological impacts. The Checklist fails to analyze the impact of wildlife-automobile collisions resulting from project-generated traffic, and how to mitigate it.

CUMULATIVE IMPACTS

Because cumulative impacts are proving more severe than discussed in the Lathrop General Plan EIR, the project would be inconsistent with the CEQA Guideline §15183 regarding exemptions to additional environmental review. According to the Checklist (p. 55), "The 2022 General Plan EIR determined that cumulative impacts to biological resources would be less than significant. ... As such, the proposed warehouse project is consistent with the adopted vision and uses identified within the General Plan, and would not result in any new or increased impacts associated with biological resources, beyond those that were already addressed in the 2022 Lathrop General Plan EIR. The proposed warehouse project would not result in a new or more severe impact than what was previously analyzed." The cumulative impacts analysis of the Lathrop General Plan EIR asserts that participation with the SJMSCP would prevent significant cumulative impacts. But it has not.

For example, burrowing owls have all but disappeared from the County, despite the SJMSCP. Over the past month (since 26 September 2023), there has only been one occurrence of burrowing owl in San Joaquin County that has been reported to eBird, and that was in Tracy. eBird Trends Analysis reveals an average 82% decline in the area of the SJMSCP (Figure 3).

Figure 3. *eBird Trends Analysis reveals an average 82% decline of burrowing owls in the area of the SJMSCP between 2007 and 2021.*



MITIGATION

Requirement BIO-1: Participation with SJMSCP

The principal mitigation measure in the City's Checklist would be participation with the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Due to grossly deficient implementation and due to poor performance of the SJMSCP, the project's impacts to wildlife should be mitigated outside the SJMSCP. The SJMSCP is currently unsuitable as a mitigation strategy for the project. A project-specific EIR needs to be prepared in order to formulate more effective mitigation. Below I explain why.

There are four major problems with relying on the SJMSCP to mitigate the project's impacts to special-status species of wildlife: (1) Not all special-status species at the site are covered by the SJMSCP; (2) Many non-covered species of birds are still protected by the federal Migratory Bird Treaty Act (MBTA) and California Migratory Bird Protection Act (MBPA), which warrant CEQA review for potential impacts; (3) The SJMSCP requires protocol-level detection surveys at project sites for covered species, but no such surveys have been performed at the site of the proposed project; and, (4) Available evidence indicates that the premise is likely false that SJMSCP participation conserves covered species. These problems are discussed further below.

(1) Seventy-one (66%) of the species in Table 2 are not covered by the SJMSCP. Four of the 10 special-status species that I saw on the project site are not covered by the SJMSCP. In other words, the SJMSCP insufficiently covers special-status species that would be adversely affected by the project. An important reason for this deficiency has been the continued assignments of special status to additional species as resource agencies have determined these species are declining or are in trouble. The growing list of special-status species is indicative of the effects of cumulative impacts. The SJMSCP failed to effectively prepare for the assignment of special status to so many more species, nor did it provide sufficient conservation benefits to prevent these assignments. Many species of wildlife have declined despite the SJMSCP.

(2) Any potentially occurring bird species protected by the MBTA and the MBPA warrants an impact assessment related to the proposed project, regardless of any additional special status. Ground-nesting birds nest on the project site, and tree- and shrub-nesting birds rely on the site for forage. Ground-nesters on the project site could include northern harrier, burrowing owl, and California horned lark among others. City of Lathrop needs to consider project impacts and mitigation for all bird species protected by the MBTA and MBPA.

(3) According to SJMSCP §5.2.2.1 (A), there is the requirement for "Preconstruction surveys to ... determine if SJMSCP Covered Species are present..." The purpose of these surveys, according to the SJMSCP §5.2.2.5, is to comply with existing protocols or guidelines for supporting a determination of species' absence as the standard, i.e., if the species is present, the surveys should detect it. In other words, although preconstruction survey normally refer to a clearance survey to avoid take by imminent use of heavy machinery to grade the project site, the SJMSCP requires protocol-level detection surveys. Such surveys are to be performed at project sites where habitat would be destroyed (SJMSCP §5.9.2.5). No detection surveys have been implemented at the site of the proposed project. A project-specific DEIR needs to be prepared, and it needs to include the results of detection surveys, including those meeting the guidelines of CDFW (2012) for burrowing owls and of CEC and CDFW (2010) for Swainson's hawks.

(4) The premise that project mitigation via SJMSCP fees will conserve special-status species lacks support of evidence, which is required in the SJMSCP and its Implementation Agreement.

The SJMSCP requires 'Pre-acquisition/Baseline surveys' at "*potential or recently acquired SJMSCP Preserves*" (SJMSCP §5.9.2.6). These surveys are characterized in the SJMSCP as detection surveys. Detection surveys are also required at proposed project sites. The SJMSCP also requires biological effectiveness monitoring at the Preserves, which are said to be needed to inform an adaptive management program. All of these surveys are intended to quantify the initial nexus between project impacts and conservation value in Preserves, and to enable managers to react to emerging deficiencies in this nexus. Monitoring biological effectiveness of the SJMSCP was supposed to be annual, whereas additional focused surveys of certain covered species were to be completed every three years. The SJMSCP also requires Annual Reports. A reasonable presumption is that the monitoring data in the Annual Reports were to be analyzed to inform adaptive management, but no such analysis has been presented during the first 23 years of the SJMSCP.

Detection Surveys at Project Sites.--In my experience in San Joaquin County, and based on my review of additional CEQA reviews in the County such as the River Project EIR and the Tracy 580 Business Park EIR, protocol-level detection surveys are rarely completed at sites of proposed new projects. The surveys that are completed are typically no more rigorous that reconnaissance-level surveys, which are unsuitable for supporting absence determinations of most animal species. Reconnaissance surveys are not detection surveys. Failure to adequately complete detection surveys as part of this step of the SJMSCP vastly diminishes the likelihood of quantifying the initial nexus between project impacts and conservation value in Preserves, and hampers the ability of managers to react to emerging deficiencies in this nexus.

Detection Surveys at New Preserves.--Baseline surveys were to be completed upon acquisition of each new Preserve, including a focused search for Swainson's hawk nests within 2 miles of the Preserve and additional focused surveys for SJMCP-covered species. The first evidence of baseline surveys having been completed was at four Preserves, as reported in the 2008 Annual Report. The 2008 Annual Report includes a list of wildlife species seen on the Rustan and Elworthy Preserves. However, no explanation is reported of how these species were detected, who performed the survey, on what date the surveys were completed, at what time the surveys were started, and for how long the surveys lasted and under what conditions. The reporting leaves the reader unable to ascertain whether many other species occurred on these Preserves but were undetected. I could find no evidence that the Baseline surveys at new Preserves qualified as detection surveys. Failure to adequately complete this step of the SJMSCP vastly diminishes the likelihood of quantifying the initial nexus between project impacts and conservation value in Preserves, and hampers the ability of managers to react to emerging deficiencies in this nexus.

Biological effectiveness monitoring.--Noriko Smallwood helped me to review the SJMSCP's Annual Reports that are available online at https://www.sjcog.org/DocumentCenter/Index/15. Noriko entered data into electronic spreadsheets, which I later analyzed. We also found, in the process of reviewing the reports and processing and analyzing their data, that the Annual Reports reveal flawed study design, deficient implementation, and poor reporting, including poor quality control. Annual Reports failed to include the results of biological effectiveness monitoring over the first five years of the certified SJMSCP. The Annual Report for 2012 is missing. The names of Preserves are inconsistent from Annual Report to Annual Report, so anyone attempting to compare survey results by year must carefully investigate the names of Preserves in order to record them consistently in database form. No trend analysis has been performed over 23 years of the SJMSCP. Because none of the Annual Reports compares biological effects monitoring among Preserves or among years, it is up to the reader to do so.

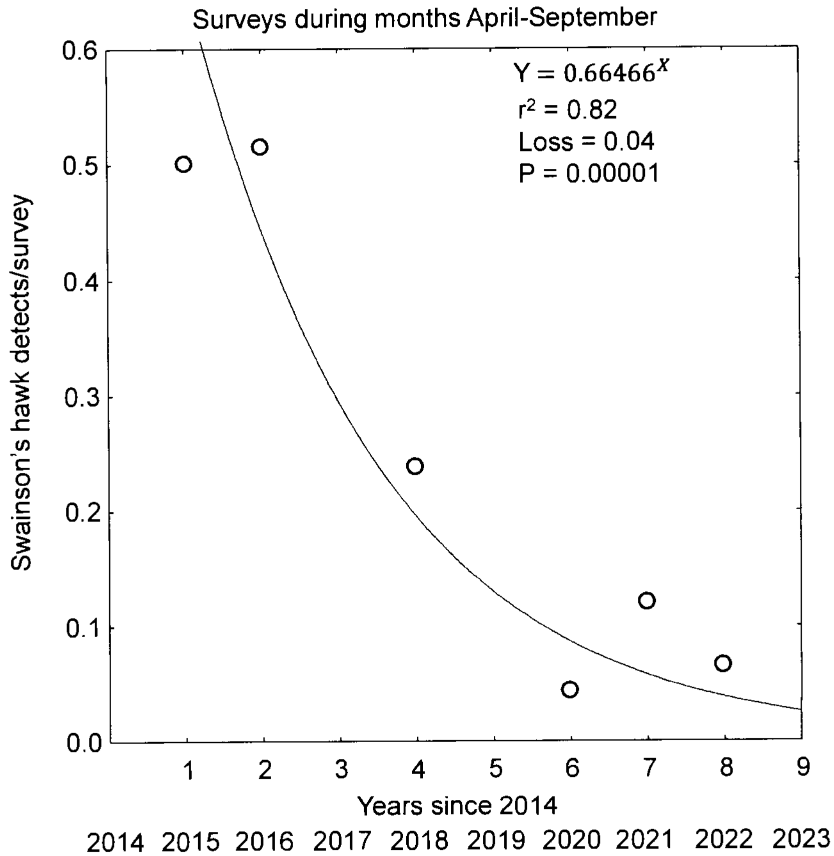
Reporting of survey results, and specifically of which wildlife species were detected, was in paragraph form for a decade, before switching to tables of results in 2015. Prior to 2015, some Annual Reports included counts of all wildlife species, whereas others included counts only of SJMSCP-covered species (2011). Annual Reports of 2008-2010 included counts of all species at certain Preserves and only covered species at other Preserves. Beginning in 2013, Annual Reports included counts of all species of wildlife, but the 2020 Annual Report only recorded the presence of those species detected by survey personnel. It was not until 2015 when all vertebrate species detections were recorded in Tables, although the referenced Table in the 2016 Annual Report does not actually appear in the Annual Report and was unavailable to us. It was not until 2015 when species counts and records of species detections qualified as comparable between years, as counts and records of presence numbered only fractions of what was reported after 2014, even including counts and records of presence of SJMSCP-covered species.

Other than the date of each survey, little of the survey methods is reported. Survey personnel are not identified. The survey method is characterized as "windshield surveys" on available roads that abut or cross the subject property, but there is no reported standard survey effort to adjust for variation in Preserve size, nor any standard on the minimum time that should be committed to each survey. No survey start time is reported. No survey duration is reported. No standards are reported about whether birds overflying the Preserve are counted, or whether animals seen just offsite are recorded, or if they are counted, then to what height above ground or distance from the Preserve's boundary they are counted. The Annual Reports fail to report the most fundamental methodological details that the reader needs to interpret the monitoring results.

The windshield surveys for wildlife have been completed at different types of year from year to year, hence rendering inter-annual survey results incomparable for migratory species. One such migratory species is Swainson's hawk, which has been the most important of the wildlife species covered by the SJMSCP. More than 63% of the surveys have been completed during times of the year when Swainson's hawks are on migration to Mexico, which means that slightly more than a third of the surveys had any potential for detection of Swainson's hawks. Therefore, I completed my analysis of Swainson's hawk detections by first filtering out the surveys that would not have detected Swainson's hawks while they were on migration.

According to the 2018 Annual Report, "Overall, the Swainson's hawk population in San Joaquin County appears to be doing well, with a relatively high density of nesting pairs and a high rate of nest success." According to the 2021 Annual Report, "the SJMSCP appears to be highly successful with respect to providing high quality habitat for Swainson's hawk." However, these conclusions were not found on any obvious comparison of performance metrics through time. After filtering the survey results as described above, I found evidence of an ongoing rapid decline of Swainson's hawks among the SJMSCP Preserves (Figure 4). Another performance metric further supports this trend, as I will report below under Focused Surveys. In any case, the above-conclusions in the 2018 and 2021 Annual Reports are inaccurate and misleading. The SJMSCP has failed to conserve Swainson's hawks, and appears to be contributing to its progress towards extirpation in the County.

Figure 4. *The number of Swainson's hawk detections per survey during the months April through September has declined rapidly among Preserves since 2014. A nonlinear regression fit to the data indicates a recent slowing of the declines, but only after detections of the species have reached a very low level.*



Not only does the evidence in the Annual Reports support the conclusion that the SJMSCP has failed to conserve Swainson's hawks, but it also supports the conclusions that the SJMSCP is also failing to conserve other covered species (Figure 5). The covered species included in Figure 5 are those also identified in Table 2, as these also have other forms of special status. Additionally, the number of species detections of all vertebrate wildlife has been rapidly declining since 2014 (Figure 6). This decline has been a 42% loss of vertebrate species richness among the Preserves in only the last seven years. Considering the trends of Swainson's hawk (Figure 4), covered species (Figure 5), and all vertebrate species (Figure 6), declines of these magnitudes are indicative of regional ecological collapse, the ecological, economic, and cultural significance of which are yet to be analyzed, but which are likely to be profound.

__Figure 5.__ The number of covered species detections per survey among Preserves has declined since 2013, according to the data from biological effectiveness monitoring in the Annual Reports.

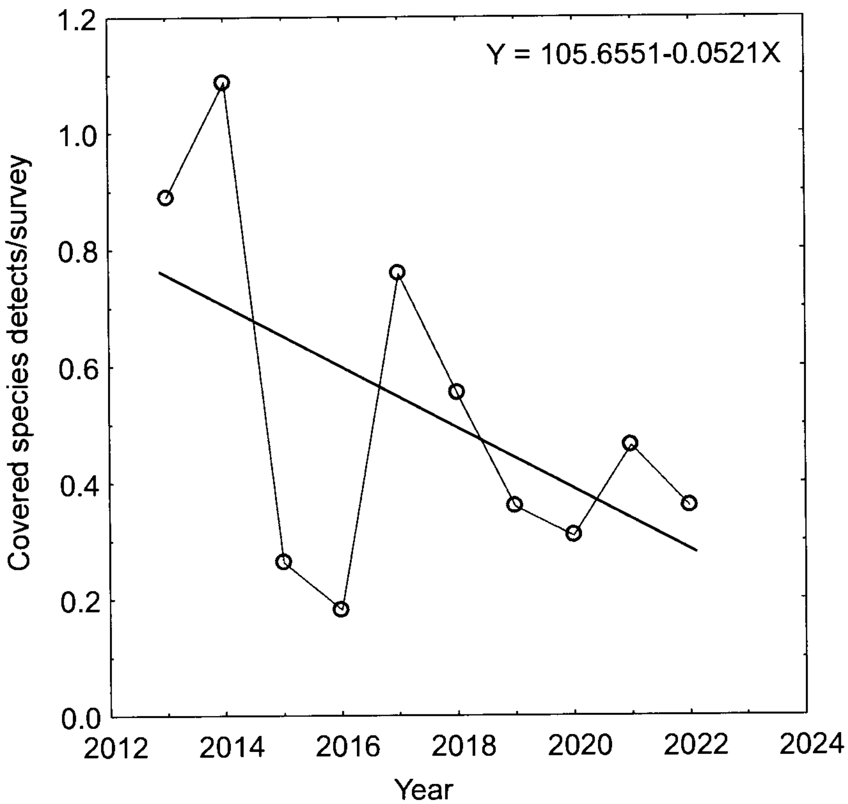
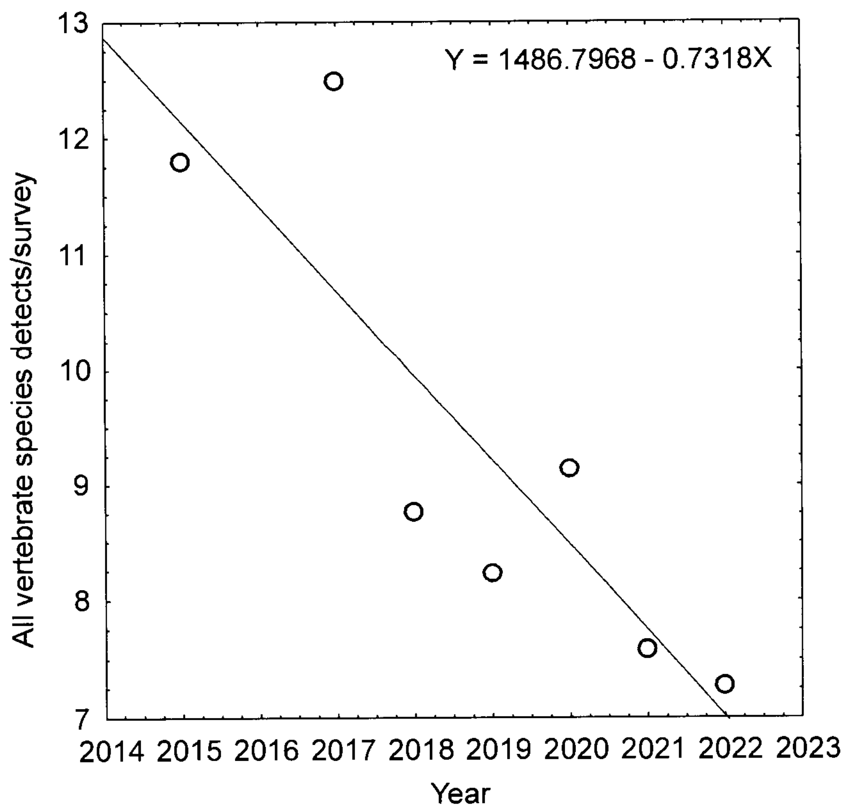


__Figure 6.__ The number of all species detections per survey among Preserves has declined since 2015, according to the data from biological effectiveness monitoring in the Annual Reports. 2015 was when all species were first routinely recorded from the surveys.



Focused Surveys.--Focused surveys for Swainson's hawks are supposed to be completed every three years, including searches for nest sites within 2 miles of each Preserve. However, the first such survey was not completed until 2007, and another eight years went by before the second survey was completed. The fourth survey was completed in 2021, thus averaging one survey per 5.25 years. The reporting of the survey results has been inconsistent, but more importantly there has yet to be a scientifically sound analysis of the data. There has been no accounting of the increase in cumulative Preserve area in the comparisons of performance metrics such as the number of active nest sites and the number of successful nests. And no comparison has been made of the performance metric, the number of fledglings per successful nest.

The number of nests/100 acres has in fact been dangerously unstable, at one point nearing zero, and most recently again undergoing a rapid decline (Figure 7). At the same time, the number of fledglings per successful nest has steadily declined by 34% between 2007 and 2021 (Figure 8). At the present rate of decline, Swainson's hawks could be extirpated from San Joaquin County before the end of the SJMSCP's permit term.

Without explanation for the 20-year delay, focused surveys for burrowing owls – the second most important covered species of the SJMSCP – did not begin until 2021. There is obviously no baseline against which to compare the findings of the 2021 survey. In 2021, the focused surveys detected only two pairs of breeding burrowing owls among all of the 16,667 acres of Preserves acquired by the time of the 2021 survey. Failure to adequately complete focused surveys as required by the SJMSCP hampers the ability of managers to react to emerging deficiencies in this nexus.

Study Design and Implementation.—The positive-sighting nature of the reporting complicates the processing and analysis of data, although none of the Annual Reports analyze the data, anyway. A more effective approach would have been to deliberately record 0 for all species that could potentially occur on a Preserve, but were not detected.

A randomized selection of sampling plots within the SJMSCP study area would have minimized potential bias in trend analysis of both the biological effectiveness monitoring and focused surveys. Instead, the SJMSCP implemented a survey design that grows and changes with the acquisitions and losses of Preserves. In other words, the sample size and the sampled area are always changing, which could change a performance metric positively or negatively for reasons having nothing to do with actual population trends.

Another trend indicative of a problem of implementation is the declining average number of acres monitored per Preserve (Figure 9). This decline reflects a trend towards acquisition of increasingly smaller properties as Preserves since the SJMSCP's inception. I do not know the reason for this trend, but it probably results from a diminishing pool of willing sellers of conservation easements in San Joaquin County. Acquiring smaller properties has likely lessened the probability of inclusion of covered species, which could bias analysis of inter-annual trends in species' detections/survey. More importantly, smaller properties are less capable of conserving covered species.

Figure 7. _Focused surveys for Swainson's hawk nest sites within two miles of Preserves have revealed an unstable trend in nests per 100 acres of cumulative Preserves, and a dangerously low density in 2017._

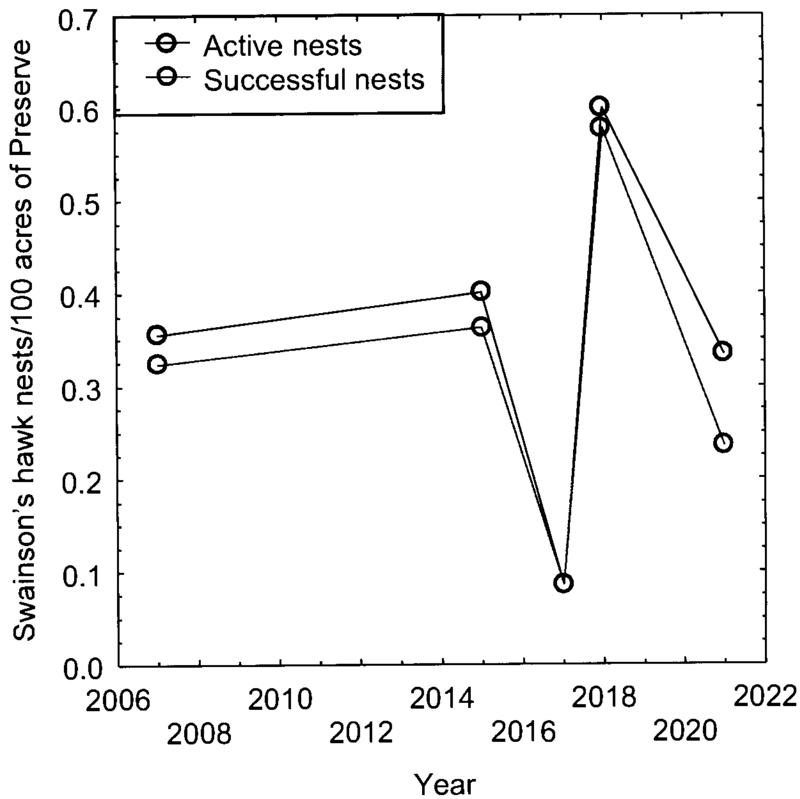


Figure 8. _Focused surveys for Swainson's hawk nest sites within two miles of Preserves have revealed a rapid decline in productivity between 2007 and 2021._

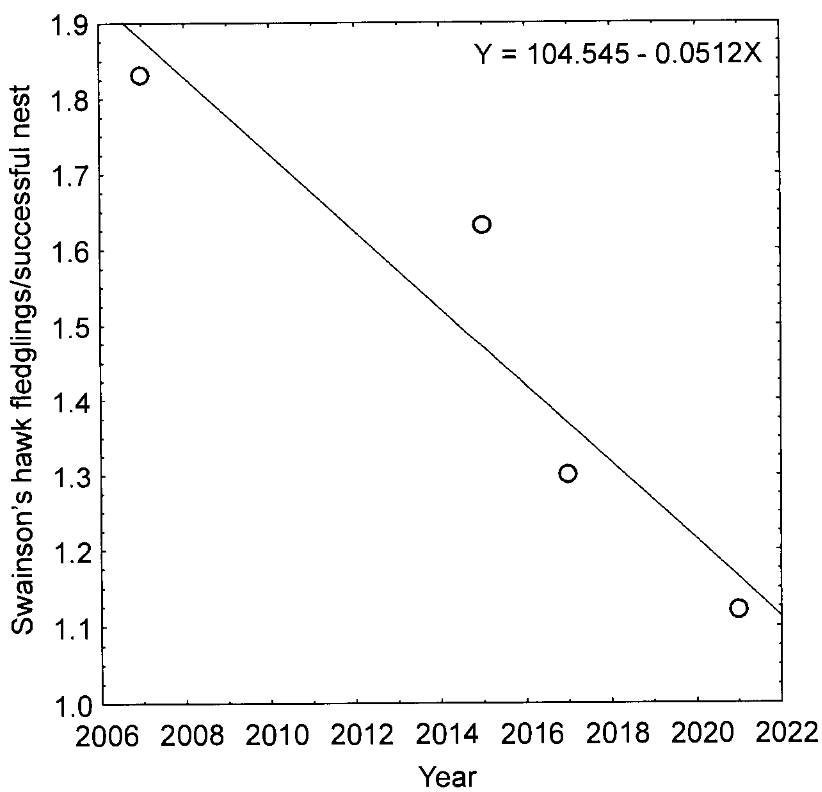
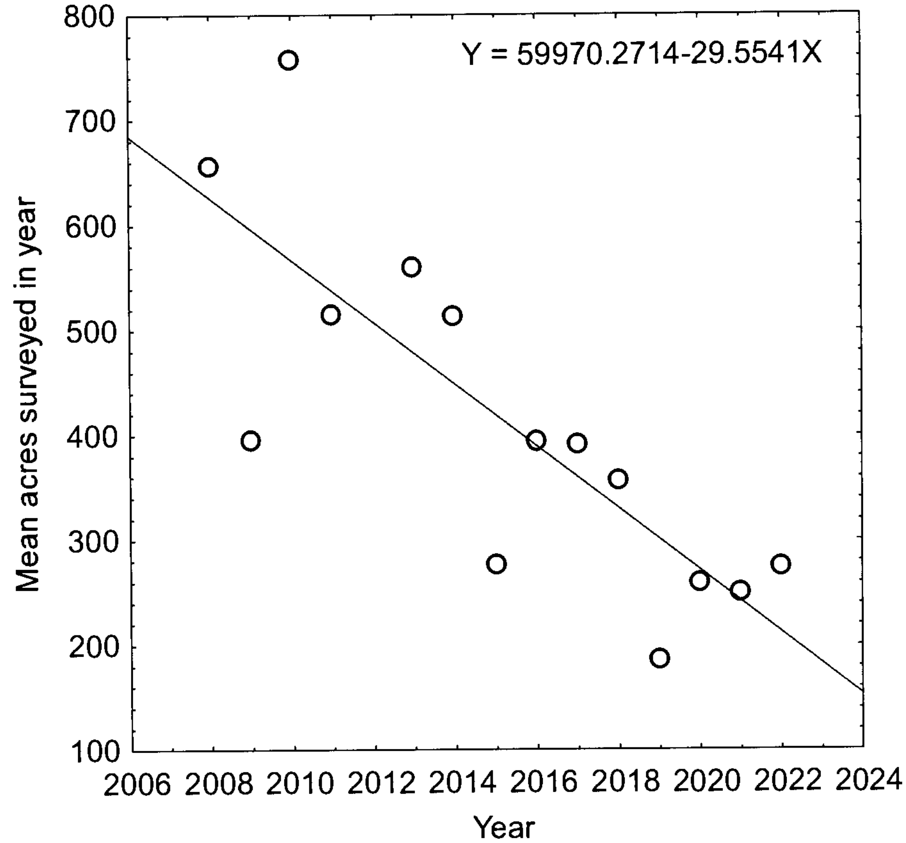


Figure 9. The average number of acres monitored among Preserves has declined by year since 2008.



Finally, although the SJMSCP's monitoring data are fraught with errors and potential biases, they are the data the SJMSCP is supposed to rely upon as evidence of the SJMSCP's performance. The absence of analysis of the data collected to date has prevented administrators of the SJMSCP from seeing (1) problems with study design, (2) problems with the data, (3) mismatches of biological resources between new project sites and Preserves, and (4) the alarming declines of covered species including Swainson's hawks and burrowing owls. Unable to see the impacts of the SJMSCP and the ineffectiveness of its mitigation plan, managers have been unable to react to emerging deficiencies in the nexus sought by the SJMSCP. The SJMSCP has failed in its implementation, and it has proven ineffective at conserving its covered species; it should not be used to mitigate impacts to wildlife that occur on the project site.

Requirement BIO-2: Recommendations of Biological Resources Analysis Report

Pre-construction Reptile Survey. Contrary to the implication by Olberding (2021), preconstruction surveys for California glossy snake and San Joaquin coachwhip cannot support absence determinations of either species. Preconstruction, take-avoidance surveys are unequal to detection surveys, as they do not carry anywhere close to the same probability of detection. Detection surveys by qualified biologists need to be completed as part of the CEQA review, and they need to inform preconstruction surveys about where members of the species are likely to be found.

Pre-Construction Avian Survey. Olberding (2021) characterizes the avian breeding season as February through August. However, the avian breeding season recognized by the California Department of Fish and Wildlife is now 1 February through 15 September.

I concur that preconstruction surveys for nesting birds should be implemented. However, having performed nest surveys for many bird species, I can attest to the difficulty of finding nest sites. Birds are highly skilled at hiding their nests, because with the exception of a few species, those birds that fail to hide their nests would fail in their nest attempts due to predation. Loggerhead shrikes and burrowing owls, as examples, make efforts to fool human observers into thinking the birds' nests are located where they are not. Locating nest sites of these species and most others requires multiple surveys over long time periods to note behavior patterns that can lead the observer to nest sites. This is why the breeding-season survey protocols require multiple surveys spaced through much of the breeding season, such as for burrowing owls (CDFW 2012). None of the available survey protocols for breeding birds recommend surveys to be completed within only a few days such as prior to construction, and this is because the notion that such a briefly conducted survey would detect more than a small fraction of nest sites is fantasy.

Preconstruction surveys should be performed for nesting birds, but not without first having completed detection surveys to inform where biologists can expect to find nests during their subsequent preconstruction surveys. Preconstruction surveys are only intended as last-minute, one-time salvage and rescue operations targeting readily detectable nests or individuals before they are crushed under heavy construction machinery. Because most special-status species are rare and cryptic, and because most bird species are expert at hiding their nests lest they get predated, most of their nests will not be detected by preconstruction surveys without prior support of detection surveys. For one thing, bird species vary in the timing of their nesting. For example, at a project site that I searched for nest attempts this past February through August, some bird species had already produced fledglings and some species began re-nesting before other bird species began nesting. Locating all of the nests on site would require more effort than is committed during preconstruction surveys. Furthermore, I found cavity-nesters to be easiest to locate, and ground-nesters the most difficult.

Regardless of whether construction timing avoids the nesting season or preconstruction surveys are completed, this measure would not reduce impacts to less-than-significant levels because the project would destroy the productive capacity of the birds that breed on the project site. Neither would the preconstruction surveys do anything to thwart or diminish the impacts of further habitat fragmentation.

Should the project go forward, I recommend that it be required of the preconstruction survey biologists to prepare a report of the methods and outcomes of preconstruction surveys. The report should be made available to the public.

Burrowing Owl Surveys. Contrary to the implication by Olberding (2021), preconstruction surveys for burrowing owls cannot support an absence determination. Preconstruction surveys are supposed to be preceded by protocol-level detection surveys (CDFW 2012). Note, also, that Olberding (2021) cites obsolete survey guidelines for burrowing owls. Furthermore, Olberding's (2021) recommendation for burrow destruction or passive relocation, no matter the behaviors of the associated burrowing owls, can be regarded as take, according to CDFW (2012).

Thank you for your attention,

Shawn Smallwood

Shawn Smallwood, Ph.D.

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Swainson's hawk perched on nest site on south side of Dos Reis Road next to the project site, 21 September 2023.

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Curriculum Vitae

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Born May 3, 1963 in
Sacramento, California.
Married, father of two.

Ecologist

Expertise

- Finding solutions to controversial problems related to wildlife interactions with human industry, infrastructure, and activities;
- Wildlife monitoring and field study using GPS, thermal imaging, behavior surveys;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns that inform management decisions.

Education

Ph.D. Ecology, University of California, Davis. September 1990.
M.S. Ecology, University of California, Davis. June 1987.
B.S. Anthropology, University of California, Davis. June 1985.
Corcoran High School, Corcoran, California. June 1981.

Experience

- 762 professional reports, including:
- 90 peer reviewed publications
- 24 in non-reviewed proceedings
- 646 reports, declarations, posters and book reviews
- 8 in mass media outlets
- 92 public presentations of research results

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC reviewed the science underlying the Alameda County Avian Protection Program, and advised the County on how to reduce wildlife fatalities.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Part-time Lecturer, 1998-2005, California State University, Sacramento. Instructed Mammalogy, Behavioral Ecology, and Ornithology Lab, Contemporary Environmental Issues, Natural Resources Conservation.

Senior Ecologist, 1999-2005, BioResource Consultants. Designed and implemented research and monitoring studies related to avian fatalities at wind turbines, avian electrocutions on electric distribution poles across California, and avian fatalities at transmission lines.

Chairman, Conservation Affairs Committee, The Wildlife Society--Western Section, 1999-2001. Prepared position statements and led efforts directed toward conservation issues, including travel to Washington, D.C. to lobby Congress for more wildlife conservation funding.

Systems Ecologist, 1995-2000, Institute for Sustainable Development. Headed ISD's program on integrated resources management. Developed indicators of ecological integrity for large areas, using remotely sensed data, local community involvement and GIS.

Associate, 1997-1998, Department of Agronomy and Range Science, University of California, Davis. Worked with Shu Geng and Mingua Zhang on several studies related to wildlife interactions with agriculture and patterns of fertilizer and pesticide residues in groundwater across a large landscape.

Lead Scientist, 1996-1999, National Endangered Species Network. Informed academic scientists and environmental activists about emerging issues regarding the Endangered Species Act and other environmental laws. Testified at public hearings on endangered species issues.

Ecologist, 1997-1998, Western Foundation of Vertebrate Zoology. Conducted field research to determine the impact of past mercury mining on the status of California red-legged frogs in Santa Clara County, California.

Senior Systems Ecologist, 1994-1995, EIP Associates, Sacramento, California. Provided consulting services in environmental planning, and quantitative assessment of land units for their conservation and restoration opportunities basedon ecological resource requirements of 29 special-status species. Developed ecological indicators for prioritizing areas within Yolo County to receive mitigation funds for habitat easements and restoration.

Post-Graduate Researcher, 1990-1994, Department of Agronomy and Range Science, *U.C. Davis*. Under Dr. Shu Geng's mentorship, studied landscape and management effects on temporal and spatial patterns of abundance among pocket gophers and species of Falconiformes and Carnivora in the Sacramento Valley. Managed and analyzed a data base of energy use in California agriculture. Assisted with landscape (GIS) study of groundwater contamination across Tulare County, California.

Work experience in graduate school: Co-taught Conservation Biology with Dr. Christine Schonewald, 1991 & 1993, UC Davis Graduate Group in Ecology; Reader for Dr. Richard Coss's course on Psychobiology in 1990, UC Davis Department of Psychology; Research Assistant to Dr. Walter E. Howard, 1988-1990, UC Davis Department of Wildlife and Fisheries Biology, testing durable baits for pocket gopher management in forest clearcuts; Research Assistant to Dr. Terrell P. Salmon, 1987-1988, UC Wildlife Extension, Department of Wildlife and Fisheries Biology, developing empirical models of mammal and bird invasions in North America, and a rating system for priority research and control of exotic species based on economic, environmental and human health hazards in California. Student Assistant to Dr. E. Lee Fitzhugh, 1985-1987, UC Cooperative Extension, Department of Wildlife and Fisheries Biology, developing and implementing statewide mountain lion track count for long-term monitoring.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling methods for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

Projects

<u>Repowering wind energy projects</u> through careful siting of new wind turbines using map-based collision hazard models to minimize impacts to volant wildlife. Funded by wind companies (principally NextEra Renewable Energy, Inc.), California Energy Commission and East Bay Regional Park District, I have collaborated with a GIS analyst and managed a crew of five field biologists performing golden eagle behavior surveys and nocturnal surveys on bats and owls. The goal is to quantify flight patterns for development of predictive models to more carefully site new wind turbines in repowering projects. Focused behavior surveys began May 2012 and continue. Collision hazard models have been prepared for seven wind projects, three of which were built. Planning for additional repowering projects is underway.

<u>Test avian safety of new mixer-ejector wind turbine (MEWT)</u>. Designed and implemented a before-after, control-impact experimental design to test the avian safety of a new, shrouded wind turbine developed by Ogin Inc. (formerly known as FloDesign Wind Turbine Corporation). Supported by a $718,000 grant from the California Energy Commission's Public Interest Energy Research program and a 20% match share contribution from Ogin, I managed a crew of seven field biologists who performed periodic fatality searches and behavior surveys, carcass detection trials, nocturnal behavior surveys using a thermal camera, and spatial analyses with the collaboration of a GIS analyst. Field work began 1 April 2012 and ended 30 March 2015 without Ogin installing its MEWTs, but we still achieved multiple important scientific advances.

Reduce avian mortality due to wind turbines at Altamont Pass. Studied wildlife impacts caused by 5,400 wind turbines at the world's most notorious wind resource area. Studied how impacts are perceived by monitoring and how they are affected by terrain, wind patterns, food resources, range management practices, wind turbine operations, seasonal patterns, population cycles, infrastructure management such as electric distribution, animal behavior and social interactions.

Reduce avian mortality on electric distribution poles. Directed research toward reducing bird electrocutions on electric distribution poles, 2000-2007. Oversaw 5 founds of fatality searches at 10,000 poles from Orange County to Glenn County, California, and produced two large reports.

Cook *et al.* v. Rockwell International *et al.*, No. 90-K-181 (D. Colorado). Provided expert testimony on the role of burrowing animals in affecting the fate of buried and surface-deposited radioactive and hazardous chemical wastes at the Rocky Flats Plant, Colorado. Provided expert reports based on four site visits and an extensive document review of burrowing animals. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals. I testified in federal court in November 2005, and my clients were subsequently awarded a $553,000,000 judgment by a jury. After appeals the award was increased to two billion dollars.

Hanford Nuclear Reservation Litigation. Provided expert testimony on the role of burrowing animals in affecting the fate of buried radioactive wastes at the Hanford Nuclear Reservation, Washington. Provided three expert reports based on three site visits and extensive document review. Predicted and verified a certain population density of pocket gophers on buried waste structures, as well as incidence of radionuclide contamination in body tissue. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals.

Expert testimony and declarations on proposed residential and commercial developments, gas-fired power plants, wind, solar and geothermal projects, water transfers and water transfer delivery systems, endangered species recovery plans, Habitat Conservation Plans and Natural Communities Conservation Programs. Testified before multiple government agencies, Tribunals, Boards of Supervisors and City Councils, and participated with press conferences and depositions. Prepared expert witness reports and court declarations, which are summarized under Reports (below).

Protocol-level surveys for special-status species. Used California Department of Fish and Wildlife and US Fish and Wildlife Service protocols to search for California red-legged frog, California tiger salamander, arroyo southwestern toad, blunt-nosed leopard lizard, western pond turtle, giant kangaroo rat, San Joaquin kangaroo rat, San Joaquin kit fox, western burrowing owl, Swainson's hawk, Valley elderberry longhorn beetle and other special-status species.

Conservation of San Joaquin kangaroo rat. Performed research to identify factors responsible for the decline of this endangered species at Lemoore Naval Air Station, 2000-2013, and implemented habitat enhancements designed to reverse the trend and expand the population.

Impact of West Nile Virus on yellow-billed magpies. Funded by Sacramento-Yolo Mosquito and Vector Control District, 2005-2008, compared survey results pre- and post-West Nile Virus epidemic for multiple bird species in the Sacramento Valley, particularly on yellow-billed magpie and American crow due to susceptibility to WNV.

Workshops on HCPs. Assisted Dr. Michael Morrison with organizing and conducting a 2-day workshop on Habitat Conservation Plans, sponsored by Southern California Edison, and another 1-day workshop sponsored by PG&E. These Workshops were attended by academics, attorneys, and consultants with HCP experience. We guest-edited a Proceedings published in Environmental Management.

Mapping of biological resources along Highways 101, 46 and 41. Used GPS and GIS to delineate vegetation complexes and locations of special-status species along 26 miles of highway in San Luis Obispo County, 14 miles of highway and roadway in Monterey County, and in a large area north of Fresno, including within reclaimed gravel mining pits.

GPS mapping and monitoring at restoration sites and at Caltrans mitigation sites. Monitored the success of elderberry shrubs at one location, the success of willows at another location, and the response of wildlife to the succession of vegetation at both sites. Also used GPS to monitor the response of fossorial animals to yellow star-thistle eradication and natural grassland restoration efforts at Bear Valley in Colusa County and at the decommissioned Mather Air Force Base in Sacramento County.

Mercury effects on Red-legged Frog. Assisted Dr. Michael Morrison and US Fish and Wildlife Service in assessing the possible impacts of historical mercury mining on the federally listed California red-legged frog in Santa Clara County. Also measured habitat variables in streams.

Opposition to proposed No Surprises rule. Wrote a white paper and summary letter explaining scientific grounds for opposing the incidental take permit (ITP) rules providing ITP applicants and holders with general assurances they will be free of compliance with the Endangered Species Act once they adhere to the terms of a "properly functioning HCP." Submitted 188 signatures of scientists and environmental professionals concerned about No Surprises rule US Fish and Wildlife Service, National Marine Fisheries Service, all US Senators.

Natomas Basin Habitat Conservation Plan alternative. Designed narrow channel marsh to increase the likelihood of survival and recovery in the wild of giant garter snake, Swainson's hawk and Valley Elderberry Longhorn Beetle. The design included replication and interspersion of treatments for experimental testing of critical habitat elements. I provided a report to Northern Territories, Inc.

Assessments of agricultural production system and environmental technology transfer to China. Twice visited China and interviewed scientists, industrialists, agriculturalists, and the Directors of the Chinese Environmental Protection Agency and the Department of Agriculture to assess the need and possible pathways for environmental clean-up technologies and trade opportunities between the US and China.

Yolo County Habitat Conservation Plan. Conducted landscape ecology study of Yolo County to spatially prioritize allocation of mitigation efforts to improve ecosystem functionality within the County from the perspective of 29 special-status species of wildlife and plants. Used a hierarchically structured indicators approach to apply principles of landscape and ecosystem ecology, conservation biology, and local values in rating land units. Derived GIS maps to help guide the conservation area design, and then developed implementation strategies.

Mountain lion track count. Developed and conducted a carnivore monitoring program throughout California since 1985. Species counted include mountain lion, bobcat, black bear, coyote, red and gray fox, raccoon, striped skunk, badger, and black-tailed deer. Vegetation and land use are also monitored. Track survey transect was established on dusty, dirt roads within randomly selected quadrats.

Sumatran tiger and other felids. Upon award of Fulbright Research Fellowship, I designed and initiated track counts for seven species of wild cats in Sumatra, including Sumatran tiger, fishing cat, and golden cat. Spent four months on Sumatra and Java in 1988, and learned Bahasa Indonesia, the official Indonesian language.

Wildlife in agriculture. Beginning as post-graduate research, I studied pocket gophers and other wildlife in 40 alfalfa fields throughout the Sacramento Valley, and I surveyed for wildlife along a 200 mile road transect since 1989 with a hiatus of 1996-2004. The data are analyzed using GIS and methods from landscape ecology, and the results published and presented orally to farming groups in California and elsewhere. I also conducted the first study of wildlife in cover crops used on vineyards and orchards.

Agricultural energy use and Tulare County groundwater study. Developed and analyzed a data base of energy use in California agriculture, and collaborated on a landscape (GIS) study of groundwater contamination across Tulare County, California.

Pocket gopher damage in forest clear-cuts. Developed gopher sampling methods and tested various poison baits and baiting regimes in the largest-ever field study of pocket gopher management in forest plantations, involving 68 research plots in 55 clear-cuts among 6 National Forests in northern California.

Risk assessment of exotic species in North America. Developed empirical models of mammal and bird species invasions in North America, as well as a rating system for assigning priority research and control to exotic species in California, based on economic, environmental, and human health hazards.

Peer Reviewed Publications

Smallwood, K. S. 2022. Utility-scale solar impacts to volant wildlife. Journal of Wildlife Management: e22216. https://doi.org/10.1002/jwmg.22216

Smallwood, K. S., and N. L. Smallwood. 2021. Breeding Density and Collision Mortality of Loggerhead Shrike (*Lanius ludovicianus*) in the Altamont Pass Wind Resource Area. Diversity 13, 540. https://doi.org/10.3390/d13110540.

Smallwood, K. S. 2020. USA wind energy-caused bat fatalities increase with shorter fatality search intervals. Diversity 12(98); https://doi.org/10.3390/d12030098

Smallwood, K. S., D. A. Bell, and S. Standish. 2020. Dogs detect larger wind energy impacts on bats and birds. Journal of Wildlife Management 84:852-864. DOI: 10.1002/jwmg.21863.

Smallwood, K. S., and D. A. Bell. 2020. Relating bat passage rates to wind turbine fatalities.

Diversity 12(84); doi:10.3390/d12020084.

Smallwood, K. S., and D. A. Bell. 2020. Effects of wind turbine curtailment on bird and bat fatalities. Journal of Wildlife Management 84:684-696. DOI: 10.1002/jwmg.21844

Kitano, M., M. Ino, K. S. Smallwood, and S. Shiraki. 2020. Seasonal difference in carcass persistence rates at wind farms with snow, Hokkaido, Japan. Ornithological Science 19: 63 – 71.

Smallwood, K. S. and M. L. Morrison. 2018. Nest-site selection in a high-density colony of burrowing owls. Journal of Raptor Research 52:454-470.

Smallwood, K. S., D. A. Bell, E. L. Walther, E. Leyvas, S. Standish, J. Mount, B. Karas. 2018. Estimating wind turbine fatalities using integrated detection trials. Journal of Wildlife Management 82:1169-1184.

Smallwood, K. S. 2017. Long search intervals under-estimate bird and bat fatalities caused by wind turbines. Wildlife Society Bulletin 41:224-230.

Smallwood, K. S. 2017. The challenges of addressing wildlife impacts when repowering wind energy projects. Pages 175-187 in Köppel, J., Editor, Wind Energy and Wildlife Impacts: Proceedings from the CWW2015 Conference. Springer. Cham, Switzerland.

May, R., Gill, A. B., Köppel, J. Langston, R. H.W., Reichenbach, M., Scheidat, M., Smallwood, S., Voigt, C. C., Hüppop, O., and Portman, M. 2017. Future research directions to reconcile wind turbine–wildlife interactions. Pages 255-276 in Köppel, J., Editor, Wind Energy and Wildlife Impacts: Proceedings from the CWW2015 Conference. Springer. Cham, Switzerland.

Smallwood, K. S. 2017. Monitoring birds. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Smallwood, K. S., L. Neher, and D. A. Bell. 2017. Turbine siting for raptors: an example from Repowering of the Altamont Pass Wind Resource Area. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Johnson, D. H., S. R. Loss, K. S. Smallwood, W. P. Erickson. 2016. Avian fatalities at wind energy facilities in North America: A comparison of recent approaches. Human–Wildlife Interactions 10(1):7-18.

Sadar, M. J., D. S.-M. Guzman, A. Mete, J. Foley, N. Stephenson, K. H. Rogers, C. Grosset, K. S. Smallwood, J. Shipman, A. Wells, S. D. White, D. A. Bell, and M. G. Hawkins. 2015. Mange Caused by a novel Micnemidocoptes mite in a Golden Eagle (*Aquila chrysaetos*). Journal of Avian Medicine and Surgery 29(3):231-237.

Smallwood, K. S. 2015. Habitat fragmentation and corridors. Pages 84-101 in M. L. Morrison and H. A. Mathewson, Eds., Wildlife habitat conservation: concepts, challenges, and solutions. John Hopkins University Press, Baltimore, Maryland, USA.

EXHIBIT B

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

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October 4, 2023

Mike Lozeau
Lozeau | Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94618

Subject: **Comments on the Municipal Code, Central Lathrop Specific Plan (CLSP) Phase 2 Update, And Ashley Warehouse Project**

Dear Mr. Lozeau,

We have reviewed the August 2023 Environmental Checklist ("Checklist") for the Municipal Code, Central Lathrop Specific Plan (CLSP) Phase 2 Update, And Ashley Warehouse Project ("Project") located in the City of Lathrop ("City"). The Project proposes to construct 1,486,607-square-feet ("SF") of mixed-use space, including 1,352,347-SF of warehouse space, 110,000-SF of retail space, 24,000- SF of office space, and 2,046 parking spaces on the 89.82-acre site.

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

Air Quality

Diesel Particulate Matter Emissions Inadequately Evaluated

The Checklist estimates that the maximum incremental cancer risk posed to nearby, existing sensitive receptors as a result of heavy-duty diesel trucks during Project operation would be 7.0 in one million, which would not exceed the San Joaquin Valley Air Pollution Control District ("SJVAPCD") significance threshold of 20 in one million (see excerpt below) (p. 44, Table AIR-4).

Table AIR-4: Summary of Maximum Health Risks

RISK METRIC	MAXIMUM RISK	SIGNIFICANCE THRESHOLD	IS THRESHOLD EXCEEDED?
Residential Cancer Risk (70-year exposure)	7.0	20 per million	No
Workplace Cancer Risk (40-year exposure)	1.3	20 per million	No
Chronic (non-cancer)	<0.01	Hazard Index ≥1	No
Acute (non-cancer)	0	Hazard Index ≥1	No

SOURCES: AERMOD 11.2.0 (LAKES ENVIRONMENTAL SOFTWARE, 2023); AND HARP-2 AIR DISPERSION AND RISK TOOL

However, the Checklist fails to conduct a construction health risk analysis ("HRA") or discuss the toxic air contaminant ("TAC") emissions associated with Project construction whatsoever. Consequently, the Checklist's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for four reasons.

First, the Checklist fails to mention or provide the exposure assumptions for the HRA, such as the age sensitivity factors ("ASF") or fraction of time at home ("FAH") values whatsoever. Until the Checklist substantiates the use of correct exposure assumptions, the HRA may underestimate the cancer risk posed to nearby, existing sensitive receptors because of Project construction. Furthermore, according to the *Risk Assessment Guidelines* provided by the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, the Checklist's models should have used the following equation:[1]

A. Equation 8.2.4 A: $\boxed{RISK_{inh\text{-}res} = DOSE_{air} \times CPF \times ASF \times ED/AT \times FAH}$

7. $RISK_{inh\text{-}res}$ = Residential inhalation cancer risk
8. $DOSE_{air}$ = Daily inhalation dose (mg/kg-day)
9. CPF = Inhalation cancer potency factor ($mg/kg\text{-}day^{-1}$)
10. ASF = Age sensitivity factor for a specified age group (unitless)
11. ED = Exposure duration (in years) for a specified age group
12. AT = Averaging time for lifetime cancer risk (years)
13. FAH = Fraction of time spent at home (unitless)

The Checklist fails to include a dose and risk equation to calculate the Project's construction cancer risks. As such, we cannot verify that the Checklist's HRA is accurate, and the Project's cancer risks may be underestimated.

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[1] "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-7 Equation 8.2.4.

Second, by failing to prepare a quantified construction HRA, the Checklist is inconsistent with CEQA's requirement to correlate the increase in emissions that the Project would generate to the adverse impacts on human health caused by those emissions.[2] This is incorrect, as construction of the proposed Project will produce DPM emissions through the exhaust stacks of construction equipment over the total construction duration. However, the Checklist fails to evaluate the potential Project-generated TACs or indicate the concentrations at which such pollutants would trigger adverse health effects. Without making a reasonable effort to connect the Project's construction-related TAC emissions to the potential health risks posed to nearby receptors, the Checklist is inconsistent with CEQA's requirement to correlate the increase in emissions generated by the Project with the potential adverse impacts on human health.

Third, the State of California Department of Justice recommends that warehouse projects prepare a quantitative HRA pursuant to OEHHA, the organization responsible for providing guidance on conducting HRAs in California, as well as local air district guidelines.[3] OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* in February 2015. This guidance document describes the types of projects that warrant the preparation of an HRA. Specifically, OEHHA recommends that all short-term projects lasting at least 2 months assess cancer risks.[4] Furthermore, according to OEHHA:

> "Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA, 2009)."[5]

As the Project's anticipated construction duration likely exceeds the 2-month and 6-month requirements set forth by OEHHA, construction of the Project meets the threshold warranting a quantified HRA under OEHHA guidance and should be evaluated for the entire construction period. These recommendations reflect the most recent state health risk policies, and consequently, a subsequent EIR should be prepared to include an analysis of health risk impacts posed to nearby sensitive receptors from Project-generated DPM emissions.

Fourth, while the Checklist includes an HRA evaluating the health risk impacts to nearby, existing receptors as a result of Project operation, the HRA fails to evaluate the combined lifetime cancer risk to nearby, existing receptors as a result of Project construction and operation together. According to OEHHA guidance "the excess cancer risk is calculated separately for each age grouping and then

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[2] "Sierra Club v. County of Fresno." Supreme Court of California, December 2018, *available at:* https://ceqaportal.org/decisions/1907/Sierra%20Club%20v.%20County%20of%20Fresno.pdf.

[3] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, *available at*: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf, p. 6.

[4] "Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-18.

[5] "Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, p. 8-18.

summed to yield cancer risk at the receptor location."[6] However, the Project's HRA fails to sum each age bin to evaluate the total cancer risk over the course of the Project's total construction and operation. This is incorrect, and an updated analysis should quantify the entirety of the Project's construction and operational health risks together and sum them to compare to the SJVAPCD threshold of 20 in one million, as referenced by the Checklist (p. 44, Table AIR-4).

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul Rosenfeld

Paul E. Rosenfeld, Ph.D.

Attachment A: Paul Rosenfeld CV
Attachment B: Matt Hagemann CV

[6] "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, *available at:* https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 8-4

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

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Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

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

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Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution.* **233,** 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences.* 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health.* 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry.* Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research.* 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld.** (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting.* Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution.* Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water.* Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting.* Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006.* Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants.* Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference.* Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust.* Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives.* Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association.* Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum.* Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable.* Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association.* Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association.* Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association.* Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference.* Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association.* Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings.* Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America.* Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America.* Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

EXHIBIT C

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September 13, 2023

Rick Caguiat
Community Development Director
Planning Commission Secretary
Community Development Department
390 Towne Centre Drive
Lathrop, California 95330
planning@ci.lathrop.ca.us

Re: Comment on Planning Commission Agenda Items No. 8.3 Regarding the Ashley Furniture Project (Conditional Use Permit No. CUP-23-08; Site Plan Review No. SPR 23-09)

Dear Mr. Caguiat and Honorable Members of the Planning Commission:

I am writing on behalf of Laborers' International Union of North America, Local Union No. 73 ("LIUNA") regarding the proposed Ashley Furniture Project proposed to be located at the northwest corner of Dos Reis Rd and Manthey Road. The Planning Commission staff have determined that the project is exempt from the requirement for preparation of environmental documents pursuant to California Environmental Quality Act ("CEQA") Guidelines, Section 15183 and Public Resources Code § 21083.3. However, after reviewing the Environmental Checklist and relevant appendices prepared for the Project, and the 2022 General Plan Update EIR that the Project relies upon, we conclude that the Project does not meet the requirements for an exemption under CEQA Guideline § 15183 and PRC § 21083.3. LIUNA respectfully requests that the Planning Commission not recommend approval of each of the agenda items addressed by the proposed exemption and, in particular, the proposed Ashley Furniture Project, and instead request staff to prepare the necessary environmental documents under CEQA.

I. PROJECT DESCRIPTION

The Project proposes to construct and operate a 1,486,607 square foot industrial building including a mix of retail, office/call center, and warehouse and distribution uses. About 110,000 square feet would be dedicated to retail use, 24,000 square feet to office and call-center uses, and 1,352,347 square feet to warehouse and distribution center uses.

The Project proposes to construct approximately 2,046 parking spaces throughout the development site, with 942 spaces for passenger vehicles and 1,104 spaces for truck trailer parking. The Project expects to generate 2,798 daily passenger vehicle trips, including 203 a.m. peak hour trips (124 inbound, 79 outbound) and 255 p.m. peak hour trips (110 inbound, 145 outbound) for passenger vehicles. Another 680 daily truck trips also are expected, including 95 a.m. peak hour trips and 45 p.m. peak hour trips.

II. LEGAL STANDARD

To achieve its objectives of environmental protection, CEQA has a three-tiered structure. 14 CCR § 15002(k); *Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App.4th 1168, 1185-86 *("Hollywoodland")*. First, if a project falls into an exempt category, or it can be seen with certainty that the activity in question will not have a significant effect on the environment, no further agency evaluation is required. *Id.* Second, if there is a possibility the project will have a significant effect on the environment, the agency must perform an initial threshold study. *Id.*; 14 CCR § 15063(a). If the study indicates that there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment the agency may issue a negative declaration. *Id.*; 14 CCR §§ 15063(b)(2), 15070. Finally, if the project will have a significant effect on the environment, an environmental impact report ("EIR") is required. *Id.*

Here, since the City purports to exempt the Project from CEQA entirely, the first step of the CEQA process applies. "Exemptions to CEQA are narrowly construed and '[e]xemption categories are not to be expanded beyond the reasonable scope of their statutory language." *Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 125. The determination as to the appropriate scope of an exemption is a question of law subject to independent, or de novo, review. *San Lorenzo Valley Community Advocates for Responsible Education v. San Lorenzo Valley Unified School Dist.*, (2006) 139 Cal. App. 4th 1356, 1375 ("[Q]uestions of interpretation or application of the requirements of CEQA are matters of law. Thus, for example, interpreting the scope of a CEQA exemption presents 'a question of law, subject to de novo review by this court.'")

Here, the City proposes that the Project is exempt from CEQA review under Section 15183 and PRC § 21083.3. However, as discussed below, the use of these streamlining provisions is improper, and instead, a full CEQA analysis, such as an EIR, must be prepared for this Project.

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III. DISCUSSION

a. The City Incorrectly Applied CEQA's Section 15183 Categorical Exemption to the Project and Thus a Full CEQA Analysis is Required.

Section 15183 of the California Environmental Quality Act allows a project to avoid environmental review if it is "consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified . . . **except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.**" 14 CCR 15183 (emphasis added). *See* PRC § 21083.3(b). The intention of this section is to "streamline[]" CEQA review for projects and avoid the preparation of repetitive documents. While the City refers to these provisions as exemptions from CEQA, environmental review is still required for various types of impacts, including those "peculiar to the project or parcel on which the project would be located," those which "were not analyzed as significant effects in a prior EIR," "are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR," or "[a]re previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR."

Section (f) of section 15183 states that a Project's environmental effects are not peculiar to a project if "uniformly applied development policies or standards have been previously adopted" which serve to mitigate environmental impacts, "unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect." The standard set forth by the statute for this analysis is substantial evidence.

Here, there is substantial evidence demonstrating that the Project will have significant impacts which were not addressed in the EIR prepared for the 2022 General Plan Update. Section 15183 therefore does not apply, and the City must prepare appropriate CEQA documents for this Project.

b. The City Must Prepare a Statement of Overriding Considerations With Regard to This Project.

The 2022 General Plan Update concluded that several of the impacts identified as a result of the General Plan Update project were significant and unavoidable. These impacts included agricultural resources, air quality, greenhouse gas, and traffic noise impacts. In the Environmental Checklist prepared for the Project, the City acknowledges these significant and unavoidable impacts, but states that:

> Impacts from buildout of the General Plan including cumulative impacts associated with development and buildout of the CLSP Phase 2 plan area

> and the warehouse Project site, as proposed, were fully addressed in the General Plan EIR (State Clearinghouse No. 2021100139), and implementation of the proposed project would not result in any new or altered impacts beyond those addressed in the General Plan EIR.

Envt'l Checklist, p. 13. Similar statements are repeated for each of the specific unavoidable significant impacts. This conclusion does not, however, address all of the City's obligations to grapple with acknowledged significant and unavoidable cumulative impacts.

In the case of *Communities for a Better Environment v. Cal. Resources Agency*, the court of appeal held that, although tiering may allow a later project to rely on the environmental analysis contained in a prior program-level EIR, that procedure does not relieve the agency of acknowledging the significant and unavoidable impacts and reconsidering its statement of overriding considerations. As the Court explained:

> The section appears to allow an agency, in approving a later project that has significant unavoidable impacts, to forego making a statement of overriding considerations *specifically tied to that project*. This is contrary to CEQA law. CEQA section 21094, subdivision (d) requires agencies that approve a later project to comply with CEQA section 21081. Under CEQA section 21081, an agency approving a project with significant environmental effects must find that each effect will be mitigated or avoided, or "that *specific* overriding economic, legal, social, technological, or other benefits of *the project* outweigh the ... effect[] ...."[65] The requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmentally detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support.[66] Under Guidelines section 15152(f)(3)(C), however, an agency apparently could adopt one statement of overriding considerations for a prior, more general EIR, and then avoid future political accountability by approving later, more specific projects with significant unavoidable impacts pursuant to the prior EIR and statement of overriding considerations. Even though a prior EIR's *analysis* of environmental effects may be subject to being incorporated in a later EIR for a later, more specific project, the responsible public officials must still go on the record and explain specifically why they are approving the later project despite *its* significant unavoidable impacts.

Communities for a Better Env't v. California Res. Agency, 103 Cal. App. 4th 98, 124–25, 126 Cal. Rptr. 2d 441 (2002), *as modified* (Nov. 21, 2002), and *disapproved of on other grounds by Berkeley Hillside Pres. v. City of Berkeley*, 60 Cal. 4th 1086, 343 P.3d 834 (2015).

The same reasoning applies to the implementation of Pub. Res. Code § 21083.3 and 14 Cal. Admin. Code § 15183. The Project, based on its reliance on the 2022 General Plan Update EIR, will have cumulative impacts on agricultural resources, air quality, greenhouse gas emissions, and traffic noise. Although sections 21083 and 15183 provide for streamlining of the environmental review of a subsequent project, neither section relieves the City from its obligation to make a statement of overriding considerations for the Project. PRC § 21081. Prior to recommending the Project and applying the streamlining provisions, the Planning Commission should prepare a statement of overriding considerations supported by substantial evidence and which evaluates whether any additional feasible mitigation measures applicable to this specific project should be required in order to address the acknowledged cumulative impacts.

c. The Project Will Have Project-Specific Significant Effects Which Were Not Addressed in the 2022 General Plan Update EIR.

LIUNA is concerned that a number of significant environmental impacts peculiar to the Project were not addressed in the 2022 General Plan Update EIR. As a result, Pub. Res. Code § 21083.3 and 14 Cal. Admin. Code § 15183 do not apply and either a mitigated negative declaration or EIR must be prepared to address these unanalyzed impacts.

i. Biological Resources

According to the 2022 General Plan EIR, the federally-listed, endangered valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) did not occur within one-mile of the planning area. GP EIR, p. 3.4-15. As a result, there is no focused discussion in the 2022 General Plan EIR on any impacts to this federally-listed species. In general, the 2022 General Plan EIR concludes that there will be no significant impacts to listed species from the General Plan's implementation. GP EIR, p. 2.4-28 – 3.4-29. The valley elderberry longhorn beetle relies on a particular host plant for its survival – the red or blue elderberry. *See* Biological Resources Analysis Report, p. 18. The reconnaissance survey conducted for the Biological Resources Analysis observed a 6-foot by 15-foot elderberry shrub on the property. *Id.*, p. 19. The presence of that host plant, the enhanced likelihood of the presence of the endangered valley elderberry longhorn beetle, and the heightened risk of adverse affects on the host plant or potentially present beetles are not addressed as a significant impact in the 2022 General Plan EIR and these effects are peculiar to the Project site. Pub. Res. Code § 21083.3. Given these facts peculiar to the site, it "might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." 14 CCR 15183.

Likewise, the observed presence of a Swainson's hawk foraging on the project site and nesting within 20 feet of the site also results in obvious effects peculiar to the project site, including not only the direct loss of foraging habitat but also disturbances from construction activities at the site and a dramatic increase in vehicles using Dos Reis Road to access the project once it is operational. Because impacts to Swainson's hawks were not addressed as significant impacts in the 2022 General Plan EIR and impact to a Swainson's hawk is peculiar to the site, those potential impacts must be addressed in a proper CEQA environmental review document and reliance on Pub. Res. Code § 21083.3 and 14 Cal. Admin. Code § 15183 is inappropriate.

Given the very limited reconnaissance-level survey performed on a single day at the Project site on May 5, 2021, LIUNA is concerned that there are numerous other listed and sensitive species foraging or located at the Project site. No effort has been made to determine the current presence of burrowing owls at the site. The past presence of red-tailed hawks and white-tailed kites foraging at the site also excludes the proposed streamlining exemption. A current and more robust survey of the Project site is necessary for the City to make any decision on these potential impacts based on substantial evidence.

In addition, the 2022 General Plan EIR does not identify the significant potential impact of the Project's thousands of trucks and car trips on wildlife from vehicle collisions with wildlife. This impact is peculiar to the Project given its proposed 2,798 daily passenger vehicle trips and 680 daily truck trips which will lead to wildlife collisions in the vicinity of the Project. Because this project-specific direct and cumulative effect was not addressed at all in the 2022 General Plan EIR, it must be addressed in an EIR or potentially a mitigated negative declaration for the Project. *See* PRC § 21083.3(c) ("Nothing in this section affects any requirement to analyze potentially significant offsite impacts and cumulative impacts of the project not discussed in the prior environmental impact report with respect to the general plan").

ii. Energy

The 2022 General Plan EIR's discussion of the General Plan's energy impacts boils down to stating that by complying with California's Building Energy Efficiency Standards ("CalGreen"), promoting the use of renewable energy sources and encouraging public transportation and bicycle use, and the fact that PG&E will generally make progress on adding new renewable energy sources to its portfolio, projects within the planning area will not have energy impacts. GP EIR, p. 3.7-41 – 3.7-42. The Environmental Checklist focuses on the Ashley Furniture Project's compliance with CalGreen and PG&E's long-term efforts. Env't Checklist, p. 66. None of these considerations address the energy effects that are peculiar to a 1.4 million square feet furniture distribution and retail center.

The standard under CEQA is whether the Project would result in wasteful, inefficient, or unnecessary consumption of energy resources. Failing to undertake "an investigation into renewable energy options that might be available or appropriate for a project" violates CEQA. *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 213. Energy conservation under CEQA is defined as the "wise and efficient use of energy." CEQA Guidelines, app. F, § I. The "wise and efficient use of energy" is achieved by "(1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) increasing reliance on renewable energy resources." *Id.*

Noting compliance with the California Building Energy Efficiency Standards (Cal.Code Regs., tit. 24, part 6 (Title 24) does not constitute an adequate analysis of energy impacts. *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264-65. Similarly, the court in *City of Woodland* held unlawful an energy analysis that relied on compliance with Title 24, that failed to assess transportation energy impacts, and that failed to address renewable energy impacts. *California Clean Energy Committee v. City of Woodland,* 225 Cal.App.4th 173, 209-13. As such, the General Plan EIR's reliance on Title 24 compliance does not address the proposed furniture warehouse Project's energy impacts. The energy effects of the Project are, by definition, peculiar to the Project. Given the vast expanse of roofing provided by the proposed Project, any evaluation of its energy impacts cannot ignore the obvious feasibility of an array of solar panels on the roof or covering the extensive parking proposed at the site. Energy efficiency, in the context of the Proposed project and site would require the consideration and implementation of sufficient solar panels to meet all of the Project's direct electricity demand, as well as solar power that would offset the considerable GHG and other air pollution emissions that will result from the thousands of trucks and cars driving to and from the Project every day once it's operational.

The Environmental Checklist contains no discussion of the project's cost effectiveness in terms of energy requirements. There is no discussion of energy consuming equipment and processes that will be used during the construction or operation of the project. The project's energy use efficiencies by amount and fuel type for each stage of the project including construction and operation were not identified. The effect of the project on peak and base period demands for electricity has not been addressed. As such, the Environmental Checklist's conclusions are unsupported by the necessary discussions of the Project's energy impacts under CEQA. An EIR or possibly a mitigated negative declaration must be prepared to assess these impacts.

iii. Greenhouse Gases and Air Quality.

The 2022 General Plan EIR did not project air pollution emissions for any given project that would be allowed by the plan. Instead, it identifies the implementation measure in the General Plan that the City "[review development, infrastructure, and planning projects for consistency with SJVAPCD requirements during the CEQA review process." GP EIR, p. 3.3-35 (RR-6a). The General Plan and the EIR go on to further require that:

> Require project applicants to prepare air quality analyses to address SJVAPCD and General Plan requirements, which include analysis and identification of:
> A. Air pollutant emissions associated with the project during construction, project operation, and cumulative conditions.
> B. Potential exposure of sensitive receptors to toxic air contaminants.
> C. Significant air quality impacts associated with the project for construction, project operation, and cumulative conditions.
> D. Mitigation measures to reduce significant impacts to less than significant or the maximum extent feasible where impacts cannot be mitigated to less than significant.

Id. Although the Environmental Checklist purports to describe these evaluation efforts, the Checklist does not provide any of the input files for the air pollution modeling conducted for the proposed Project. Only the output files are provided. Environmental Checklist, Attachment I, p. 162. Given the size of the warehouse and the number of expected daily truck trips, LIUNA is skeptical that the emissions forecasts identified for its construction and operation can be substantiated. Before making a recommendation to the Council, the Planning Commission should require staff and the applicant to share their input files for the CalEEMod modeling in order for the public to be able to assess the accuracy of the model outputs and whether or not the Project's may have a significant effect on air quality and GHG emissions and the extent of necessary mitigation measures as required by the General Plan.

IV. CONCLUSION

In light of the above comments, the City must prepare an EIR or, if appropriate, a mitigated negative declaration for the Project. LIUNA reserves its right to submit additional comments and evidence for any subsequent Planning Commission hearing or the City Council's consideration of the Project. Thank you for considering these comments.

Sincerely,

Michael R. Lozeau

Michael R. Lozeau
LOZEAU DRURY LLP

ATTACHMENT " 14 "

Manteca Unified School District

Victoria Brunn,
Chief Business and Information Officer

vbrunn@musd.net | (209) 858-0764

September 28, 2023

VIA E-MAIL (TVARGAS@CI.LATHROP.CA.US,) & U.S. MAIL

Mayor and City Council
City of Lathrop
Attn: City Clerk
390 Towne Centre Dr.
Lathrop, CA 95330

Re: Conditional Use Permit and Site Plan Review for the Ashley Furniture Project to Allow for the Construction of an Approximately 1.5 Million Square Foot Concrete Tilt-Up Building Located within the Central Lathrop Specific Plan Phase 2 Area.

Honorable Mayor and City Council Members:

The District remains concerned with the Limited Industrial Zoning Districts behind the Lathrop High School site, as noted in our response to the Central Lathrop Specific Plan and therefore the proposed Ashley Furniture development project has the potential to impact the District. Lathrop High School is located immediately to the southwest of the project site on the southern side of Dos Reis. District staff has reviewed the buffer and screening requirements and finds the 73-foot buffer requirements that include an 8-foot solid wall in addition to pedestrian improvements along Dos Reis to be critical to provide for separation of uses. The District is supportive of the addition of the 8-foot separated multi-use trail along the southern side of Dos Reis for improved pedestrian safety.

The District is in agreement with the circulation requirements that prohibit truck traffic on Dos Reis, and the requirement for traffic to be directed to S. Manthey Road as the access point to the project site. The District would request the City include MUSD in the review process and route any modification to existing lane striping plans that could impact District transportation. This coordination would ensure minimal impacts.

Please let us know if there is any additional information needed from MUSD to assist in the review process. Do not hesitate to contact me should you have any questions at (209) 858-0858 or developerfees@musd.net.

Sincerely,

Victoria Brunn

Victoria Brunn
Chief Business and Information Officer
Manteca Unified school District

Cc: Rick Cagiuat, Director Community Development, via email (RCagiuat@ci.lathrop.ca.us)

De Novo Planning Group

A Land Use Planning, Design, and Environmental Firm

October 31, 2023

Rick Caguiat, Community Development Director
City of Lathrop
390 Towne Centre Drive
Lathrop, CA 95330

SUBJECT: Response to LIUNA Comments on the Ashley Warehouse CEQA Analysis

The City Council received written correspondence from Lozeau Drury, LLP, representing LIUNA regarding the City's environmental analysis for the Ashley Warehouse Project prepared under the California Environmental Quality Act ("CEQA") pursuant to Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 (the "Environmental Analysis"). The comment letter incorrectly asserts that additional CEQA analysis must be completed for the Ashley Warehouse project, and the City must adopt a statement of overriding considerations.

The City correctly applied Public Resources Code Section 21083.3 and Section 15183 of the CEQA Guidelines

The City relied on the exemption provisions provided under Public Resources Code Section 21083.3 and Section 15183 of the CEQA Guidelines. Public Resources Code Section 21083.3 and corresponding State CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an EIR was certified. The Ashley Warehouse project is consistent with the City of Lathrop General Plan land uses and development intensities designated on the project site. As such, the application of CEQA to the approval of development projects, such as the proposed Ashley Project, shall be limited to effects on the environment which are peculiar to the parcel or to the Project and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report. (Pub. Res. Code § 21083.3.) Further, an effect of a project on the environment is not considered peculiar to the parcel or the project, if uniformly applied development policies or standards have been adopted by the local agency with a finding that they will substantially mitigate that effect when applied to future projects. (State CEQA Guidelines § 15183(f).)

The lead agency must make a finding at a public hearing that any mitigation measures in the prior EIR that apply to the project's specific effects, and that the lead agency found to be feasible, will be undertaken. (Pub. Res. Code § 21083.3(c); State CEQA Guidelines § 15183(e).) The City has done that here, by incorporating relevant policies, actions, standards, and other mitigating requirements as Conditions of Approval for the Ashley Warehouse project. These requirements and standards are specifically identified throughout the Environmental Analysis the City prepared for the Ashley Warehouse project. Such a finding is not required for potentially significant environmental effects that are *not* considered peculiar to the parcel or the project if uniformly applied development policies or standards were previously adopted by the agency with a finding that the policies or standards would substantially mitigate the environmental effect when applied to future projects. (State CEQA Guidelines § 15183(f).) When the agency has failed to make such a finding previously, it can do so when it approves the later project.

Often, such certified prior EIRs are Program EIRs and, in fact, the factual questions as to whether project impacts fall within the scope of the prior EIR are very similar. As to reliance on a Program EIR, later activities are examined to determine whether an additional environmental document must be prepared. (State CEQA Guidelines § 15168(c).) As the commenter notes, if a later activity would result in environmental effects that were not examined in the

Program EIR, the agency must prepare an initial study to determine whether an EIR or negative declaration is required to address those effects. (*Id.)* However, as is the case here, if a later activity would not have any effects that were not examined in the Program EIR (including any new or more severe impacts), the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required. (*Id.*)

Factors that an agency may consider in determining whether a later activity is within the scope of a Program EIR include "consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure as described in the program EIR." (State CEQA Guidelines § 15168(c).) An agency must incorporate feasible mitigation measures and alternatives developed in the Program EIR into later activities in the program. (*Id.)* "Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR." (*Id.)*

The City's Environmental Analysis complies with both Section 15183 and Section 15168 of the State CEQA Guidelines. The commenter claims that an EIR is required for the Project. While the applicability of the exemption provided by State CEQA Guidelines 15183 does not turn on whether the City completes some form of preliminary review, here the City did use an environmental checklist which identifies whether or not each CEQA Appendix G environmental checklist question, and its corresponding impacts, were adequately addressed in the Lathrop General Plan EIR, if there is a significant impact due to new information, or if the Project would result in a significant impact peculiar to the Project site that was not adequately addressed in the General Plan EIR. The Environmental Analysis identifies the applicable City of Lathrop development standards and policies that would apply to the proposed Project during both the construction and operational phases, identifies applicable state-level standards and requirements, and explains how the application of these uniformly applied standards and policies would ensure that no peculiar or site-specific environmental impacts would occur.

The Project would not result in site-specific biological impacts that cannot be mitigated through application of uniform standards and requirements

The Biological Resources Analysis Report (BRA) prepared by Olberding Environmental, dated May 2021, and updated on November 1, 2023, identified several special-status species having the potential to occur on the subject Property based on the presence of suitable habitat. In fact, several protected avian species were observed during the site visit but in a foraging capacity only. The BRA document was prepared to provide a preliminary or general assessment of biological habitats present on the subject property and to evaluate current wildlife usage of those habitats during a single day site visit. The intent of this document was to provide initial biological information and make recommendations for additional studies if suitable habitat for a particular species was present.

As indicated above, the BRA determined that there is a potential for impacts to several special-status species. In particular, it noted the presence of a Swainson's Hawk nest on the adjacent project. As such, mitigation for foraging habitat is normally required, in addition to a setback buffer during the nesting season for this species and additional survey requirements as contemplated in the City of Lathrop General Plan Update EIR. These requirements have been made conditions of approval for the project, as required by both the Lathrop General Plan and the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP).

It should also be recognized that resources agencies have determined that mitigation should proceed through the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). In November of 2000, San

Joaquin County adopted and began implementing the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJCOG 2000). The plan was developed to provide a strategy for balancing the protection of Open Space and wildlife with the protection of local landowners and agricultural practices. The SJMSCP, in accordance with ESA Section 10(a)(1)(B) and CESA Section 2081(b) Incidental Take Permits, provides compensation for the Conversion of Open Space to non-Open Space uses which affect the plant, fish and wildlife species covered by the SJMSCP. Species that are covered by the SJMSCP that have the potential to occur within the Property include VELB, Swainson's hawk, burrowing owl, and the western mastiff bat as discussed in the BRA. Compliance with the requirements established in the SJMSCP, which are clearly identified in the BRA and Environmental Analysis, would ensure that impacts to special status species would be reduced to a less than significant level.

The Project's Biological Report does not underestimate the diversity of species using the Project site.

The BRA was prepared to provide a preliminary or general assessment of biological habitats present on the subject property and to evaluate current wildlife usage of those habitats during the site visit. This information was provided for supporting informational purposes in order to initially assess biological resources and make recommendations for a more focused evaluation consistent with the SJMSCP and associated incidental take permits prior to grading.

The Project's Biological Report accurately characterizes the existing environmental setting.

The site survey, literature and databases review conducted by Olberding Environmental provided adequate information to determine special-status species having potential to occur on the Property. As documented in the BRA, the site contains a single habitat type referred to as ruderal/ disturbed grassland. This habitat type is generally associated with agricultural fields and is generally dominated by non-native invasive species. The commenter did not provide any evidence that the assessment was inadequate, just because Dr. Smallwood saw different species using the Property than Olberding Environmental noted during their site visits.

The Biological Report adequately analyzed and mitigated the Project's biological impacts due to habitat loss, wildlife movement, and vehicle collisions.

The BRA document was prepared to provide a preliminary or general assessment of biological habitats present on the subject property and to evaluate current wildlife usage of those habitats.

In its October 9 Letter, LIUNA summarizes the findings from Dr. Smallwood's review of the Project which jumbles a transportation and biological impact analysis to misleadingly suggest that only the Project will result in a certain number of wildlife roadway mortality incidents. This explanation, however, ignores the City of Lathrop's summary of the biological resource impacts discussed in the CEQA consistency analysis and reference to and incorporation of the findings from the City's General Plan Update EIR prepared in 2022. CEQA requires later activities to be "examined in the light of the program EIR to determine whether an additional environmental document must be prepared." (CEQA Guidelines, § 15168(c).) Here, the City not only relied on the CEQA Consistency review under 15183 and its analysis of biological resources based on the BRA analysis, but it also incorporated by reference into the CEQA consistency analysis the General Plan Update EIR which anticipated development of the Property.

With respect to roadway wildlife fatalities, the CEQA Guidelines do not recognize this as an environmental impact. (See CEQA Guidelines, Appendix G.) Although an analysis of this impact is unwarranted, Olberding visited the project site again on October 25, 2023 and confirmed that few bird species were observed on roads surrounding the Property. No federally or state listed bird species were observed on the property other than a Swainson's hawk foraging on the Property. Habitat present on-site offers marginal foraging habitat for raptors. There is no evidence to support Dr. Smallwood's claim that the Project traffic would result in 6,151 roadway wildlife fatalities due to additional traffic only from the Project (traffic that was previously accounted for in the General Plan Update EIR).

No new species with potential to occur on the Property have been listed, no critical habitat has been designated that may be affected by the Project, and no project description changes that would change a level of potential effect were identified.

The Project correctly relies on the SJMSCP to mitigate the Project's potential impacts to biological resources.

The SJMSCP, in accordance with ESA Section 10(a)(1)(B) and CESA Section 2081(b) Incidental Take Permits, provides compensation for the Conversion of Open Space to non-Open Space uses which affect the plant, fish and wildlife species covered by the SJMSCP. Species that are covered by the SJMSCP that have the potential to occur within the Property include VELB, Swainson's hawk, burrowing owl, and the western mastiff bat.

The Project's impacts to biological resources would require compliance with the SJMSCP, as required by the General Plan update and the incidental take permits. It has been stated that the SJMSCP cannot be relied upon to mitigate the Project's impacts due to grossly deficient implementation and poor performance of the SJMSCP. We have not been provided any information as to SJMSCP mitigation requirements so we cannot fully evaluate the adequacy of these claims. There is no evidence that USFWS or CDFW have threatened to suspend or revoke the incidental take permits because the SJMSCP is not effective in mitigating impacts.

The Project's potential biological impacts are mitigated via the application of uniformly applied standards and requirements, rendering the 15183 exemption appropriate

The recommendations in the initial BRA include preconstruction surveys for reptiles, birds, and burrowing owls. They are project requirements in order to ensure that direct take would not occur and to provide additional information as to the presence/absence of a particular species which had been identified as having potential to occur on the Property based on multiple factors. The BRA acknowledged that Swainson's Hawk foraging habitat will be negatively impacted when existing foraging habitat is converted to develop lands. Standard mitigation requires that adequate foraging habitat be permanent protected/preserved at an agency approved mitigation ratio and site consistent with the SJMSCP.

The Project's potential Air Quality and Health Risk Impacts were properly evaluated

LIUNA (the commenter) asserts that the analysis of the Project's impacts to human health from emissions of toxic air contaminants is inadequate. Specifically, the commenter states that, for warehouses and distribution centers within 1,000 feet of planned residential uses or other sensitive receptors, the 2022 General Plan requires "requires the preparation of a Health Risk Assessment ("HRA") that meets the standards established by the Office of Environmental Health Hazard Assessment ("OEHHA"), and the San Joaquin Valley Air Pollution Control District ("SJVAPCD"). (2022 GP, p. 3.3-31 [LU-5c].). The commenter states that, that HRA did not comply with the standards established by OEHHA and, as a result, the Project's impacts had not been adequately evaluated.

Specifically, the commenter states that the environmental analysis failed to provide the exposure assumptions for the HRA, such as the age sensitivity factors ("ASF") or fraction of time at home ("FAH") values. The commenter also states that the environmental analysis failed to provide the dose and risk equation used to calculate the Project's cancer risks. (Id.) Without providing this equation, there is no way to verify that the HRA utilized the proper equation recommended by OEHHA.

The commenter also states that the HRA prepared for the Project failed to follow OEHHA guidance because it only analyzed the Project's operational cancer risks but not the Project's construction-related cancer risks.

With regard to operational HRA age sensitivity factors (ASF), it is important to note that such factors are calculated automatically by the HARP2 application, which was used for the HRA, consistent with OEHHA and SJVAPCD guidance. As described on page 3 of the previously developed HRA for the project, the health risks that were evaluated were a 70-year exposure, starting at the third trimester (for residential cancer risk) and a 40-year exposure starting at age 16 (for workplace cancer risk), which is fully consistent with SJVAPCD guidance. Separately, with regard to FAH values, the HRA conservatively assumed a 24-hour per day (i.e. 100%) FAH value for all scenarios; this is a highly conservative assumption, given that operations would almost certainly occur less than 24 hours per day (i.e. less than 100% of the time). Therefore, these assumptions, taken together, provide for a conservative assessment of the Project's operational cancer risk.

With regard to the commenter's claim that the environmental analysis "failed to provide the dose and risk equation used to calculate the Project's cancer risks", this is a moot point. This is because, consistent with OEHHA and SJVAPCD guidance, dose and risk equations are handled by the AERMOD and HARP2 models; separate 'dose and risk equation[s]' would be duplicative and inappropriate, given that the analysis of health risks is undertaken by the applicable models. Moreover, Appendix 3 and Appendix 4 of the previously developed HRA include the AERMOD Output File, and the HARP2 Output File, respectively, which allows for verification of the modeling parameters.

With regard to the commenter's claim that the Project failed to follow OEHHA guidance because it only analyzed the Project's operational cancer risks but ignored the Project's construction-related cancer risks, this comment is noted. While the SJVAPCD does not require an assessment of a project's construction-related cancer risks, in contrast to the commenter's claim, for the sake of a conservative assessment, a subsequent analysis of the Project's construction-related cancer risks is provided below. The parameters used for this subsequent construction-related health risk modeling in AERMOD and HARP2 are as follows:

AERMOD:

- Six (6) Off-road Construction Vehicle volume sources;
- Release height: 10 feet;
- 24-hour fraction of time at-home (FAH) value.

HARP2

- Exposure duration: 70 year, starting at 3rd trimester (Residential Cancer); 40 year, starting at age 16 (Workplace Cancer);
- Intake Rate Percentile: 95th (High End);
- Pathways to Evaluate: Mandatory Minimum Pathways;
- Deposition Rate: 0.05 m/s (uncontrolled sources).

The results of the construction HRA subsequently conducted for the Project are provided in the below table. The construction HRA uses conservative assumptions, such as a 24-hour FAH value. As shown in the below table (Table A-1), construction health risks associated with the Project, in conjunction with the operational health risks associated with the Project, would remain below the applicable thresholds. It should be noted that the 'combined health risks' for residential cancer risk is less than the combination of the individual maximum operational-related and construction-related health risks, since the residential receptors with the highest operational-related health risks are not the same receptors as those with the highest construction-related health risks (and vice versa).

Table A-1: Summary of Project Health Risks

Risk Metric	*Maximum Risk*	*Significance Threshold*	*Is Threshold Exceeded?*
Operational-related Health Risks			
Residential Cancer Risk (70-year exposure)	7.0	20 per million	No
Workplace Cancer Risk (40-year exposure)	1.3	20 per million	No
Chronic (non-cancer)	<0.01	Hazard Index ≥1	No
Acute (non-cancer)	0	Hazard Index ≥1	No
Construction-related Health Risks			
Residential Cancer Risk (70-year exposure)[1]	10.3	20 per million	No
Workplace Cancer Risk (40-year exposure)	5.2	20 per million	No
Chronic (non-cancer)	<0.01	Hazard Index ≥1	No
Acute (non-cancer)	0	Hazard Index ≥1	No
Combined Health Risks[2]			
Residential Cancer Risk (70-year exposure)[3]	13.3	20 per million	No
Workplace Cancer Risk (40-year exposure)	6.5	20 per million	No
Chronic (non-cancer)	<0.01	Hazard Index ≥1	No
Acute (non-cancer)	0	Hazard Index ≥1	No

Sources: AERMOD 11.2.0 (Lakes Environmental Software, 2023); and HARP-2 Air Dispersion and Risk Tool.

[1] The residential receptor with the highest construction-related health risk is the residence located at 14302 Harlan Rd.

[2]The combined health risks are less than the combination of the maximum operational-related and construction-related health risks, since the residential receptor with the highest operational-related health risk (located at 12965 Manthey Road) is not the same receptor as the receptor with the highest construction-related health risk (and vice versa).

[3]The residential receptor with the highest combined operational-related and construction-related health risk is located at 14302 Harlan Road.

Furthermore, the Construction Emissions Calculations, the AERMOD Output File, and the HARP2 Output file for the construction HRA is provided in Appendices A through C of this Response to Comments chapter, respectively. With this supplemental information, the commenter's claim that the analysis could underestimate the Project's health impacts is unsubstantiated. Furthermore, the commenter's claim that the HRA does not comply with the OEHHA standards as required by the 2022 General Plan, and that the City lacks substantial evidence to conclude that the Project will not result in specific health impacts, is also unsubstantiated. No further response to this comment is warranted.

The Project would not result in Energy-Related impacts

The commenter states that the environmental analysis focuses on the Project's compliance with CalGreen and PG&E's long-term efforts, but that this does not address the energy effects that are particular to the project itself.

This comment is noted. A supplemental energy analysis is provided below. The below supplemental energy analysis includes a more detailed qualitative and quantitative discussion of the energy effects that are particular to the Project itself, and addresses some additional issues, consistent with requests of the commenter.

According to the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed project would be considered "wasteful, inefficient, and unnecessary" if it were to violate State and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, effects on local and regional energy supplies or on requirements for additional capacity, compliance with existing energy standards, effects on energy resources, or transportation energy use requirements. In addition, the project could have a significant energy impact if it would conflict or create an inconsistency with an applicable plan, policy, or regulation for renewable energy or energy efficiency.

The proposed warehouse project includes various characteristics that reduce the inefficient, wasteful, or unnecessary use of energy. For example, the proposed project would comply with all of the energy efficiency requirements of the latest version of the California Title 24 Energy Efficiency Standards. Moreover, it should be noted that, over time, electrification of the vehicles will increase due to state requirements, and state and national trends.

The amount of energy used by the proposed warehouse project during operation would include the amount of energy used by project buildings and outdoor lighting, and the fuel used by vehicle trips generated during Project construction and operation, fuel used by off-road construction vehicles during construction activities, and fuel used by project maintenance activities during project operation. The following discussion provides a detailed calculation of energy usage expected for the proposed project, as provided by applicable modelling software (i.e. CalEEMod v2022.1 and the CARB EMFAC2021).

Electricity and Natural Gas

Electricity and natural gas used by the proposed warehouse project would be used primarily to generate energy for the warehouse building, as well as for outdoor parking lot lighting. "Energy" is one of the categories that was modeled for GHG emissions. As also shown in the CalEEMod modeling outputs, the proposed project is anticipated to consume approximately 155,122 kWh of electricity per year and approximately 82,578 kBTU per of natural gas per year. Moreover, this is likely a conservative estimate, given that the CalEEMod model does not account for the latest version of Title 24.

On-road Vehicles (Operation)

The proposed warehouse project would generate vehicle trips (i.e., passenger vehicles for employees and heavy-duty trucks for hauling) during its operational phase. Requirements to limit the idling of vehicles and equipment would result in fuel savings. Similarly, compliance with applicable State laws and regulations would limit idling and a part of a comprehensive regulatory framework that is implemented by the CARB. A description of project operational on-road mobile energy usage is provided below.

De Novo Planning Group used fleet mix data from the CalEEMod (v.2022.1) output for the proposed project, and Year 2025 gasoline and diesel MPG (miles per gallon) factors for individual vehicle classes as provided by EMFAC2021, to derive weighted average gasoline and diesel MPG factors for the vehicle fleet as a whole. Based on these calculations, as provided in Appendix D, upon full buildout, the proposed project would generate operational vehicle trips that would use a total of approximately 481 gallons of gasoline and 1,113 gallons of diesel per day, or 175,665 gallons of gasoline and 406,148 gallons of diesel per year.

The proposed warehouse would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Title 24 Energy Efficiency Standards for Nonresidential Buildings and Green Building Code Standards. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), and indoor and outdoor lighting, are widely regarded as the some of the most advanced and stringent building energy efficiency standards in the country. Moreover, as specified in Chapter 5, Part 11 of the Title 24 standards, the proposed project would be required to incorporate electrical conduit to facilitate future installation of EV charging infrastructure. In addition, as specified in Subchapter 6, Part 6 of the Title 24 standards, the proposed project would be required to design the proposed buildings to structurally accommodate future installation of a rooftop solar system. As such, the design of the proposed project would facilitate the future commitment to renewable energy resources. Therefore, building energy consumption would not be considered wasteful, inefficient, or unnecessary.

On-road Vehicles (Construction)

The proposed warehouse would also generate on-road vehicle trips during project construction (from construction workers and vendors travelling to and from the project site). De Novo Planning Group estimated the vehicle fuel consumed during these trips based on the assumed construction schedule, vehicle trip lengths and number of workers per construction phase as provided by CalEEMod, and Year 2023 gasoline and diesel MPG factors provided by EMFAC2021 (year 2023 factors were used to represent a conservative analysis, as the energy efficiency of construction activities is anticipated to improve over time). For the sake of simplicity and to be conservative, it was assumed that all construction worker light duty passenger cars and truck trips use gasoline as a fuel source, and all medium and heavy-duty vendor trucks use diesel fuel. Table A-2, below, describes gasoline and diesel fuel consumed during each construction phase (in aggregate). As shown, the vast majority of on-road mobile vehicle fuel used during the construction of the proposed project would occur during the building construction phase. See Appendix D of document for a detailed accounting of construction on-road vehicle fuel usage estimates.

Table A-2: On-road Mobile Fuel USE by Project Construction Activities – By Phase

Construction Phase	*Total Gallons of Gasoline Fuel(b)*	*Total Gallons of Diesel Fuel(b)*
Site Preparation	1,328	-
Grading	1,420	-
Building Construction	429	388
Paving	618	-
Architectural Coatings	69	-
Total	**3,864**	**388**

Note: [(a)] Provided by CalEEMod Output. [(b)]See Appendix D of this EIR for Further Detail
Source: CalEEMod (v.2022.1); EMFAC2021.
Off-road Equipment (Construction)
Off-road construction equipment would use diesel fuel during the construction phase of the proposed project. A non-exhaustive list of off-road constructive equipment expected to be used during the construction phase of the proposed Project includes: forklifts, generator sets, tractors, excavators, and dozers. Based on the total amount of CO_2 emissions expected to be generated by the proposed Project (as provided by the CalEEMod output), and standard conversion factors (as provided by the U.S. Energy Information Administration), the proposed Project would use a total of approximately 107,094 gallons of diesel fuel for off-road construction equipment. Detailed calculations are provided in Appendix D.
State laws and regulations would limit idling from both on-road and off-road diesel-powered equipment and are part of a comprehensive regulatory framework that is implemented by the CARB. Additionally, as a practical matter, it is reasonable to assume that the overall construction schedule and process would be designed to be as efficient as feasible in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for further future efficiency gains during construction are limited. For the foregoing reasons, it is anticipated that the construction phase of the project would not result in wasteful, inefficient, and unnecessary consumption of energy.

<u>Other</u>

The project is anticipated to install a solar photovoltaic (PV) roof system, including on-site PV connection to the local electric grid. This would be consistent with, at minimum, state requirements. This addition of renewable energy to a currently vacant site would help the State make progress on adding new renewable energy resources within the state.

Separately, it should be noted that the proposed warehouse would not be anticipated to result in a wasteful, inefficient, or unnecessary consumption of energy resources for several reasons. For example, the proposed warehouse would generate a substantial amount of economic activity on a site that currently produces virtually no economic activity (being a vacant site); furthermore, the usage of energy resources on the site would be to dense, economically productive activities. The addition of on-site renewable energy resources would reduce any risk that the proposed project would results in any kind of wasteful or inefficient usage of energy resources.

It should further be noted that the proposed project would, over time, take advantage of the increasing electrification and improved energy efficiency of the vehicle fleet, which is anticipated to improve considerably over time, due to technological advancements as well as state requirements.

Lastly, the proposed project is anticipated to operational throughout the day and night, which would reduce potential issues associated with adding inordinate demand to typical 'peak' hours for the electric utility (i.e. PG&E).

Conclusion

The proposed project would use energy resources for the operation of the project warehouse building (natural gas and electricity), outdoor lighting (electricity), on-road vehicle trips (e.g. gasoline and diesel fuel) generated by the proposed project, and off-road and on-road construction activities associated with the proposed project (e.g. diesel fuel). Each of these activities would require the use of energy resources. The proposed project would be responsible for conserving energy, including through project features, as well as through the implementation of statewide and local measures.

The proposed project would comply with all applicable federal, State, and local regulations regulating energy usage. For example, PG&E, the electric and natural gas provider to the proposed project, is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of implementing the statewide RPS to increase the proportion of renewable energy (e.g. solar and wind) within its energy portfolio. PG&E has already achieved renewable energy mix of 50% (as of 2021)[1], and is on track to achieve the required renewable energy mix of 60% by 2030. Other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g. the Pavley Bill and the Low Carbon Fuel Standard), would improve vehicle fuel economies, thereby conserving gasoline and diesel fuel. These energy savings would continue to accrue over time. Moreover, the proposed project would comply with the City's General Plan goals, objectives and policies related to energy conservation that are relevant to this analysis.

The proposed project would comply with all existing energy standards and would not be expected to result in significant adverse impacts on energy resources. For these reasons, the proposed project would not cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the energy-related thresholds as described by the CEQA Guidelines.

As described above, the supplemental energy analysis provided above addresses transportation energy impacts, renewable energy impacts, energy efficiency, cost effectiveness in terms of energy requirements, a discussion of the Project's energy-consuming equipment and processes that would be used during the construction or operation of the Project, and the effect of the Project on peak and base period demands for electricity (as requested by the commenter). No further response to this comment is warranted.

A Statement of Overriding Considerations is not required

CEQA only requires a statement of overriding considerations when a lead agency determines that a project will result in significant and unavoidable impacts (CEQA Guidelines Section 15093). The General Plan EIR evaluated full buildout of the Lathrop General Plan and Land Use Map, both of which this project is consistent with. While full buildout of the entire Lathrop General Plan was determined to result in some significant and unavoidable impacts in the General Plan EIR, that EIR has been certified, and a statement of overriding considerations was adopted for the General Plan and the associated EIR.

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[1] See here for more detail: https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page

In this instance, the environmental analysis completed for the proposed Ashley Warehouse project correctly concluded that this individual project would not result in any new or more severe significant impacts than those that were analyzed and disclosed in the General Plan EIR, and that the project would not result in any project-specific significant and unavoidable impacts. As such, there is no need for the City to prepare further environmental review or adopt a Statement of Overriding Considerations for the proposed Ashley Warehouse project.

Construction Emissions (Off-Road Equipment)

365 days per year

Phase	Average Daily PM10		Days	
Site Preparation (2023)	0.32	lbs/day	70	Source: CalEEMod (v2022.1)
Site Preparation (2024)	0.42	lbs/day	91	Source: CalEEMod (v2022.1)
Grading (2024)	0.61	lbs/day	155	Source: CalEEMod (v2022.1)
Building Construction (2024)	0.01	lbs/day	9	Source: CalEEMod (v2022.1)
Building Construction (2025)	0.17	lbs/day	141	Source: CalEEMod (v2022.1)
Paving (2025)	0.09	lbs/day	90	Source: CalEEMod (v2022.1)
Architectural Coating (2025)	0.01	lbs/day	121	Source: CalEEMod (v2022.1)
	188.54	**lbs (total)**		

Given 27 months of total construction activities:

83.79555556 lbs/year (average)

Per Volume Source (of 6):

13.96592593 lbs/year (average)

```
** Lakes Environmental AERMOD MPI
**
****************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 11.2.0
** Lakes Environmental Software Inc.
** Date: 10/26/2023
** File: C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley
Warehouse - Revised (Construction)\Ashley Warehouse.ADI
**
****************************************
**
**
****************************************
** AERMOD Control Pathway
****************************************
**
**
CO STARTING
   TITLEONE C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley
   MODELOPT CONC FLAT
   AVERTIME 1 PERIOD
   POLLUTID OTHER
   RUNORNOT RUN
   ERRORFIL "Ashley Warehouse.err"
CO FINISHED
**
****************************************
** AERMOD Source Pathway
****************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
   LOCATION VOL1          VOLUME     650380.000  4188444.670         0.0
** DESCRSRC Construction Volume Source (1)
   LOCATION VOL2          VOLUME     649783.770  4188428.620         0.0
** DESCRSRC Construction Volume Source (2)
   LOCATION VOL3          VOLUME     649783.770  4188630.660         0.0
** DESCRSRC Construction Volume Source (3)
   LOCATION VOL4          VOLUME     650380.000  4188635.710         0.0
** DESCRSRC Construction Volume Source (4)
   LOCATION VOL5          VOLUME     650090.120  4188630.380         0.0
** DESCRSRC Construction Volume Source (5)
   LOCATION VOL6          VOLUME     650096.690  4188433.810         0.0
** DESCRSRC Construction Volume Source (6)
** Source Parameters **
   SRCPARAM VOL1               1.0     3.048    35.240     0.000
```

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   SRCPARAM VOL2                  1.0     3.048    35.240     0.000
   SRCPARAM VOL3                  1.0     3.048    35.514     0.000
   SRCPARAM VOL4                  1.0     3.048    36.481     0.000
   SRCPARAM VOL5                  1.0     3.048    35.253     0.000
   SRCPARAM VOL6                  1.0     3.048    37.370     0.000
   SRCGROUP VOL1      VOL1
   SRCGROUP VOL2      VOL2
   SRCGROUP VOL3      VOL3
   SRCGROUP VOL4      VOL4
   SRCGROUP VOL5      VOL5
   SRCGROUP VOL6      VOL6
SO FINISHED
**
****************************************
** AERMOD Receptor Pathway
****************************************
**
**
RE STARTING
** DESCRREC "" ""
   DISCCART    649676.34   4188314.55
   DISCCART    649629.66   4188294.84
   DISCCART    649810.15   4188312.48
   DISCCART    649364.10   4188360.20
   DISCCART    649327.80   4188355.01
   DISCCART    649380.70   4188758.52
   DISCCART    650495.81   4188841.51
   DISCCART    650597.47   4188832.17
   DISCCART    650536.27   4188878.85
   DISCCART    650577.76   4188877.81
   DISCCART    650602.66   4188860.18
   DISCCART    650610.95   4188880.93
   DISCCART    650638.10   4188858.53
   DISCCART    650664.10   4188331.03
   DISCCART    650668.72   4188350.83
   DISCCART    650677.96   4188379.86
   DISCCART    650699.74   4188414.84
   DISCCART    650758.47   4188658.36
   DISCCART    650765.73   4188678.82
   DISCCART    650773.65   4188706.54
   DISCCART    650778.27   4188726.34
   DISCCART    650805.33   4188805.53
   DISCCART    650806.65   4188824.01
   DISCCART    650811.27   4188843.81
   DISCCART    650814.57   4188862.29
   DISCCART    650846.24   4188924.98
   DISCCART    650850.86   4188951.38
   DISCCART    650854.82   4188976.46
   DISCCART    650698.00   4188307.32
   DISCCART    650692.60   4188291.80
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   DISCCART    650724.82   4189245.80
   DISCCART    650726.07   4189273.37
   DISCCART    650856.27   4189006.30
   DISCCART    650857.23   4189022.60
   DISCCART    650859.15   4189041.29
   DISCCART    650859.15   4189058.54
   DISCCART    650860.58   4189076.28
   DISCCART    650861.54   4189094.49
   DISCCART    650857.71   4189113.19
   DISCCART    650847.16   4189118.94
   DISCCART    650848.12   4189134.76
   DISCCART    650850.04   4189155.37
   DISCCART    650851.48   4189171.66
   DISCCART    650853.87   4189184.12
   DISCCART    650856.75   4189199.46
   DISCCART    650857.71   4189213.36
   DISCCART    650860.58   4189226.30
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   DISCCART    650867.77   4189275.19
   DISCCART    650868.73   4189291.49
   DISCCART    650872.09   4189309.23
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   DISCCART    650875.92   4189340.38
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   DISCCART    650881.19   4189373.45
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   DISCCART    650891.74   4189443.43
   DISCCART    650895.09   4189461.17
   DISCCART    650898.45   4189475.55
   DISCCART    650898.45   4189489.93
   DISCCART    650902.28   4189504.31
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   DISCCART    650722.45   4188284.03
   DISCCART    650745.73   4188280.30
   DISCCART    650735.49   4188223.50
   DISCCART    650721.52   4188167.62
** DESCRREC "UCART1" "Receptors generated from Uniform Cartesian Grid"
   DISCCART    650525.76   4188133.34
   DISCCART    651125.76   4188133.34
   DISCCART    649125.76   4188183.34
   DISCCART    649225.76   4188183.34
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   DISCCART    649425.76   4188183.34
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   DISCCART    649625.76   4188183.34
   DISCCART    649725.76   4188183.34
   DISCCART    649825.76   4188183.34
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DISCCART	649925.76	4188183.34
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DISCCART	650225.76	4188183.34
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DISCCART	650025.76	4188883.34

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   DISCCART    650125.76   4188883.34
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   DISCCART    650425.76   4188933.34
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   DISCCART    650825.76   4189083.34
   DISCCART    651125.76   4189083.34
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   DISCCART    650625.76   4189133.34
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   DISCCART    650825.76   4189133.34
   DISCCART    651125.76   4189133.34
** DESCRREC "" ""
   DISCCART    650781.98   4189510.65
   DISCCART    650760.33   4189397.50
RE FINISHED
**
****************************************
** AERMOD Meteorology Pathway
****************************************
**
**
ME STARTING
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```
   SURFFILE AERMET\Stockton_2013-2017.SFC
   PROFFILE AERMET\Stockton_2013-2017.PFL
   SURFDATA 23237 2013 Stockton_International_Airport
   UAIRDATA 23230 2013 OAKLAND/WSO_AP
   PROFBASE 10.06 METERS
ME FINISHED
**
****************************************
** AERMOD Output Pathway
****************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 VOL1 1ST "Ashley Warehouse.AD\01H1G001.PLT" 31
   PLOTFILE 1 VOL2 1ST "Ashley Warehouse.AD\01H1G002.PLT" 32
   PLOTFILE 1 VOL3 1ST "Ashley Warehouse.AD\01H1G003.PLT" 33
   PLOTFILE 1 VOL4 1ST "Ashley Warehouse.AD\01H1G004.PLT" 34
   PLOTFILE 1 VOL5 1ST "Ashley Warehouse.AD\01H1G005.PLT" 35
   PLOTFILE 1 VOL6 1ST "Ashley Warehouse.AD\01H1G006.PLT" 36
   PLOTFILE PERIOD VOL1 "Ashley Warehouse.AD\PE00G001.PLT" 37
   PLOTFILE PERIOD VOL2 "Ashley Warehouse.AD\PE00G002.PLT" 38
   PLOTFILE PERIOD VOL3 "Ashley Warehouse.AD\PE00G003.PLT" 39
   PLOTFILE PERIOD VOL4 "Ashley Warehouse.AD\PE00G004.PLT" 40
   PLOTFILE PERIOD VOL5 "Ashley Warehouse.AD\PE00G005.PLT" 41
   PLOTFILE PERIOD VOL6 "Ashley Warehouse.AD\PE00G006.PLT" 42
   SUMMFILE "Ashley Warehouse.sum"
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of           0 Fatal Error Message(s)
 A Total of           8 Warning Message(s)
 A Total of           0 Informational Message(s)


    ******** FATAL ERROR MESSAGES ********
               ***  NONE  ***


    ********   WARNING MESSAGES   ********
 SO W320      48         VPARM: Input Parameter May Be Out-of-Range for Parameter
    SZINIT
 SO W320      49         VPARM: Input Parameter May Be Out-of-Range for Parameter
    SZINIT
```

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SO W320      50        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
SO W320      51        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
SO W320      52        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
SO W320      53        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
ME W186     454       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used
     0.50
ME W187     454       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET


***********************************
*** SETUP Finishes Successfully ***
***********************************

 *** AERMOD - VERSION  19191 ***   *** C:\Users\Smith\Dropbox\My PC
(DESKTOP-977GSBU)\Documents\HRA\Ashley  ***        10/26/23
*** AERMET - VERSION  18081 ***   ***
                       ***        16:20:52

                                  PAGE   1
*** MODELOPTs:    NonDFAULT  CONC  FLAT  RURAL  ADJ_U*

                                        ***     MODEL SETUP OPTIONS SUMMARY
 ***
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - -

**Model Is Setup For Calculation of Average CONCentration Values.

  --  DEPOSITION LOGIC  --
**NO GAS DEPOSITION Data Provided.
**NO PARTICLE DEPOSITION Data Provided.
**Model Uses NO DRY DEPLETION.  DRYDPLT  =  F
**Model Uses NO WET DEPLETION.  WETDPLT  =  F

**Model Uses RURAL Dispersion Only.

**Model Allows User-Specified Options:
        1. Stack-tip Downwash.
        2. Model Assumes Receptors on FLAT Terrain.
        3. Use Calms Processing Routine.
        4. Use Missing Data Processing Routine.
        5. No Exponential Decay.

**Other Options Specified:
        ADJ_U*   - Use ADJ_U* option for SBL in AERMET
        CCVR_Sub - Meteorological data includes CCVR substitutions
```

```
        TEMP_Sub - Meteorological data includes TEMP substitutions

 **Model Assumes No FLAGPOLE Receptor Heights.

 **The User Specified a Pollutant Type of:  OTHER

 **Model Calculates  1 Short Term Average(s) of:   1-HR
     and Calculates PERIOD Averages

 **This Run Includes:      6 Source(s);       6 Source Group(s); and     370
Receptor(s)

                with:      0 POINT(s), including
                           0 POINTCAP(s) and      0 POINTHOR(s)
                 and:      6 VOLUME source(s)
                 and:      0 AREA type source(s)
                 and:      0 LINE source(s)
                 and:      0 RLINE/RLINEXT source(s)
                 and:      0 OPENPIT source(s)
                 and:      0 BUOYANT LINE source(s) with      0 line(s)


 **Model Set To Continue RUNning After the Setup Testing.

 **The AERMET Input Meteorological Data Version Date:  18081

 **Output Options Selected:
          Model Outputs Tables of PERIOD Averages by Receptor
          Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE
Keyword)
          Model Outputs External File(s) of High Values for Plotting (PLOTFILE
Keyword)
          Model Outputs Separate Summary File of High Ranked Values (SUMMFILE
Keyword)

 **NOTE:  The Following Flags May Appear Following CONC Values:  c for Calm Hours
                                                                 m for Missing
Hours
                                                                 b for Both Calm
and Missing Hours

 **Misc. Inputs:  Base Elev. for Pot. Temp. Profile (m MSL) =    10.06 ;  Decay
Coef. =    0.000     ;  Rot. Angle =     0.0
                  Emission Units = GRAMS/SEC                                   ;
Emission Rate Unit Factor =   0.10000E+07
                  Output Units   = MICROGRAMS/M**3

 **Approximate Storage Requirements of Model =      3.6 MB of RAM.

 **Input Runstream File:          aermod.inp
```

**Output Print File: aermod.out

**Detailed Error/Message File: Ashley Warehouse.err

**File for Summary of Results: Ashley Warehouse.sum

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
VOL1	0	0.10000E+01	650380.0	4188444.7	10.1	3.05	35.24	0.00	NO	
VOL2	0	0.10000E+01	649783.8	4188428.6	10.1	3.05	35.24	0.00	NO	
VOL3	0	0.10000E+01	649783.8	4188630.7	10.1	3.05	35.51	0.00	NO	
VOL4	0	0.10000E+01	650380.0	4188635.7	10.1	3.05	36.48	0.00	NO	
VOL5	0	0.10000E+01	650090.1	4188630.4	10.1	3.05	35.25	0.00	NO	
VOL6	0	0.10000E+01	650096.7	4188433.8	10.1	3.05	37.37	0.00	NO	

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS

***

SRCGROUP ID   SOURCE IDs
-----------   ----------

VOL1   VOL1   ,

VOL2   VOL2   ,

VOL3   VOL3   ,

VOL4   VOL4   ,

VOL5   VOL5   ,

VOL6   VOL6   ,

*** AERMOD - VERSION 19191 *** *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley *** 10/26/23
*** AERMET - VERSION 18081 *** *** *** 16:20:52

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

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(649327.8, 4188355.0, 10.1, 10.1, 0.0); (649380.7, 4188758.5, 10.1, 10.1, 0.0);
(650495.8, 4188841.5, 10.1, 10.1, 0.0); (650597.5, 4188832.2, 10.1, 10.1, 0.0);
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(650602.7, 4188860.2, 10.1, 10.1, 0.0); (650611.0, 4188880.9, 10.1, 10.1, 0.0);
(650638.1, 4188858.5, 10.1, 10.1, 0.0); (650664.1, 4188331.0, 10.1, 10.1, 0.0);
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(650699.7, 4188414.8, 10.1, 10.1, 0.0); (650758.5, 4188658.4, 10.1, 10.1, 0.0);
(650765.7, 4188678.8, 10.1, 10.1, 0.0); (650773.7, 4188706.5, 10.1, 10.1, 0.0);
(650778.3, 4188726.3, 10.1, 10.1, 0.0); (650805.3,

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     ( 649625.8, 4188183.3,      10.1,      10.1,       0.0);          ( 649725.8,
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     ( 650025.8, 4188183.3,      10.1,      10.1,       0.0);          ( 650125.8,
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     ( 650225.8, 4188183.3,      10.1,      10.1,       0.0);          ( 650325.8,
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     ( 650425.8, 4188183.3,      10.1,      10.1,       0.0);          ( 650525.8,
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                                        (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                      (METERS)

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     ( 650725.8, 4188233.3,      10.1,      10.1,       0.0);          ( 650825.8,
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     ( 651125.8, 4188233.3,      10.1,      10.1,       0.0);          ( 649125.8,
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4188383.3,       10.1,       10.1,        0.0);
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4188383.3,       10.1,       10.1,        0.0);
     ( 649825.8, 4188383.3,       10.1,       10.1,        0.0);            ( 649925.8,
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     ( 650025.8, 4188383.3,       10.1,       10.1,        0.0);            ( 650125.8,
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4188433.3,      10.1,      10.1,       0.0);
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                                        *** DISCRETE CARTESIAN RECEPTORS ***
                                      (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                     (METERS)

     ( 650525.8, 4188433.3,      10.1,      10.1,       0.0);         ( 650625.8,
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     ( 650725.8, 4188433.3,      10.1,      10.1,       0.0);         ( 650825.8,
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(649325.8, 4188733.3, 10.1, 10.1, 0.0); (649425.8,
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(649525.8, 4188733.3, 10.1, 10.1, 0.0); (649625.8,
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(649725.8, 4188733.3, 10.1, 10.1, 0.0); (649825.8,
4188733.3, 10.1, 10.1, 0.0);

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(649925.8, 4188733.3, 10.1, 10.1, 0.0); (650025.8,
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(650125.8, 4188733.3, 10.1, 10.1, 0.0); (650225.8,
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(649425.8, 4188883.3, 10.1, 10.1, 0.0); (649525.8,
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(649625.8, 4188883.3, 10.1, 10.1, 0.0); (649725.8,
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(650225.8, 4188883.3, 10.1, 10.1, 0.0); (650325.8,
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(650425.8, 4188883.3, 10.1, 10.1, 0.0); (650525.8,
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(650625.8, 4188883.3, 10.1, 10.1, 0.0); (650725.8,

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(650825.8, 4188883.3,   10.1,   10.1,   0.0);   (651125.8, 4188883.3,   10.1,   10.1,   0.0);
(650125.8, 4188933.3,   10.1,   10.1,   0.0);   (650225.8, 4188933.3,   10.1,   10.1,   0.0);
(650325.8, 4188933.3,   10.1,   10.1,   0.0);   (650425.8, 4188933.3,   10.1,   10.1,   0.0);
(650525.8, 4188933.3,   10.1,   10.1,   0.0);   (650625.8, 4188933.3,   10.1,   10.1,   0.0);
(650725.8, 4188933.3,   10.1,   10.1,   0.0);   (650825.8, 4188933.3,   10.1,   10.1,   0.0);
(651125.8, 4188933.3,   10.1,   10.1,   0.0);   (650425.8, 4188983.3,   10.1,   10.1,   0.0);
(650525.8, 4188983.3,   10.1,   10.1,   0.0);   (650625.8, 4188983.3,   10.1,   10.1,   0.0);
(650725.8, 4188983.3,   10.1,   10.1,   0.0);   (650825.8, 4188983.3,   10.1,   10.1,   0.0);
(651125.8, 4188983.3,   10.1,   10.1,   0.0);   (650525.8, 4189033.3,   10.1,   10.1,   0.0);
(650625.8, 4189033.3,   10.1,   10.1,   0.0);   (650725.8, 4189033.3,   10.1,   10.1,   0.0);
(650825.8, 4189033.3,   10.1,   10.1,   0.0);   (651125.8, 4189033.3,   10.1,   10.1,   0.0);
(650525.8, 4189083.3,   10.1,   10.1,   0.0);   (650625.8, 4189083.3,   10.1,   10.1,   0.0);

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(650725.8, 4189083.3,   10.1,   10.1,   0.0);   (650825.8, 4189083.3,   10.1,   10.1,   0.0);
(651125.8, 4189083.3,   10.1,   10.1,   0.0);   (650525.8, 4189133.3,   10.1,   10.1,   0.0);
(650625.8, 4189133.3,   10.1,   10.1,   0.0);   (650725.8, 4189133.3,   10.1,   10.1,   0.0);
(650825.8, 4189133.3,   10.1,   10.1,   0.0);   (651125.8, 4189133.3,   10.1,   10.1,   0.0);
(650782.0, 4189510.6,   10.1,   10.1,   0.0);   (650760.3, 4189397.5,   10.1,   10.1,   0.0);

*** 16:20:52

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

* SOURCE-RECEPTOR COMBINATIONS FOR WHICH CALCULATIONS MAY NOT BE PERFORMED *

LESS THAN 1.0 METER; WITHIN OPENPIT; OR BEYOND 80KM FOR FASTAREA/FASTALL

SOURCE ID	XR (METERS)	YR (METERS)	DISTANCE (METERS)
VOL1	650425.8	4188383.3	0.75
VOL1	650325.8	4188433.3	-20.36
VOL1	650425.8	4188433.3	-28.62
VOL1	650425.8	4188483.3	-15.85
VOL2	649725.8	4188383.3	-2.18
VOL2	649825.8	4188383.3	-14.01
VOL2	649725.8	4188433.3	-17.56
VOL2	649825.8	4188433.3	-33.51
VOL3	649725.8	4188583.3	-1.49
VOL3	649725.8	4188633.3	-18.28
VOL3	649825.8	4188633.3	-34.28
VOL3	649825.8	4188683.3	-8.99
VOL4	650425.8	4188583.3	-8.89
VOL4	650325.8	4188633.3	-24.14
VOL4	650425.8	4188633.3	-32.61
VOL4	650325.8	4188683.3	-6.25

VOL4 650425.8 4188683.3
-12.38
VOL5 650025.8 4188633.3
-11.37
VOL5 650125.8 4188633.3
-40.03
VOL5 650125.8 4188683.3
-11.96
VOL6 650125.8 4188383.3
-22.10
VOL6 650025.8 4188433.3
-9.41
VOL6 650125.8 4188433.3
-51.27

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***

(1=YES; 0=NO)

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***

(METERS/SEC)

1.54, 3.09, 5.14, 8.23,
10.80,

↑ *** AERMOD - VERSION 19191 *** *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley *** 10/26/23
*** AERMET - VERSION 18081 *** ***
*** 16:20:52

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

Surface file: AERMET\Stockton_2013-2017.SFC
Met Version: 18081
Profile file: AERMET\Stockton_2013-2017.PFL

Surface format: FREE

Profile format: FREE

Surface station no.: 23237 Upper air station no.: 23230
Name: STOCKTON_INTERNATIONAL_AIRPORT Name: OAKLAND/WSO_AP
Year: 2013 Year: 2013

First 24 hours of scalar data

YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS	WD	HT	REF TA	HT
13	01	01	1	01	-22.0	0.211	-9.000	-9.000	-999.	232.	48.8	0.07	2.20	1.00	2.78	149.	10.0	273.8	2.0
13	01	01	1	02	-14.6	0.158	-9.000	-9.000	-999.	152.	27.6	0.04	2.20	1.00	2.37	77.	10.0	273.8	2.0
13	01	01	1	03	-18.4	0.181	-9.000	-9.000	-999.	185.	36.0	0.06	2.20	1.00	2.52	97.	10.0	273.1	2.0
13	01	01	1	04	-6.7	0.105	-9.000	-9.000	-999.	84.	16.0	0.04	2.20	1.00	1.63	349.	10.0	272.5	2.0
13	01	01	1	05	-20.1	0.193	-9.000	-9.000	-999.	203.	40.9	0.04	2.20	1.00	2.86	356.	10.0	274.2	2.0
13	01	01	1	06	-3.9	0.081	-9.000	-9.000	-999.	64.	12.6	0.04	2.20	1.00	1.23	77.	10.0	273.8	2.0
13	01	01	1	07	-18.3	0.180	-9.000	-9.000	-999.	184.	35.8	0.06	2.20	1.00	2.52	255.	10.0	273.1	2.0
13	01	01	1	08	-26.9	0.259	-9.000	-9.000	-999.	316.	73.8	0.08	2.20	0.73	3.29	287.	10.0	274.2	2.0
13	01	01	1	09	-1.9	0.212	-9.000	-9.000	-999.	236.	461.6	0.05	2.20	0.39	2.81	315.	10.0	275.9	2.0

```
 13 01 01   1 10   61.1  0.155  0.630  0.005  150.  147.     -5.5  0.04   2.20
0.27    1.60  336.   10.0  277.5    2.0
 13 01 01   1 11  110.2  0.238  1.137  0.005  488.  279.    -11.2  0.06   2.20
0.23    2.45  228.   10.0  279.9    2.0
 13 01 01   1 12  137.1  0.276  1.492  0.008  886.  347.    -14.0  0.08   2.20
0.22    2.69  286.   10.0  280.4    2.0
 13 01 01   1 13  141.1  0.271  1.531  0.007  929.  339.    -12.9  0.05   2.20
0.21    2.88  325.   10.0  282.5    2.0
 13 01 01   1 14  121.3  0.232  1.475  0.006  965.  269.     -9.4  0.04   2.20
0.22    2.57  356.   10.0  283.8    2.0
 13 01 01   1 15   78.7  0.218  1.287  0.005  988.  244.    -12.0  0.04   2.20
0.26    2.47  357.   10.0  284.2    2.0
 13 01 01   1 16   17.6  0.265  0.783  0.005  993.  327.    -96.0  0.03   2.20
0.35    3.59    2.   10.0  284.2    2.0
 13 01 01   1 17  -11.2  0.143 -9.000 -9.000 -999.  139.     24.1  0.04   2.20
0.60    2.16  346.   10.0  282.5    2.0
 13 01 01   1 18   -8.7  0.125 -9.000 -9.000 -999.  107.     20.6  0.08   2.20
1.00    1.67  273.   10.0  279.2    2.0
 13 01 01   1 19  -13.3  0.154 -9.000 -9.000 -999.  145.     26.0  0.06   2.20
1.00    2.15  238.   10.0  278.1    2.0
 13 01 01   1 20  -10.2  0.134 -9.000 -9.000 -999.  117.     21.4  0.06   2.20
1.00    1.89  230.   10.0  275.9    2.0
 13 01 01   1 21  -12.5  0.148 -9.000 -9.000 -999.  137.     24.2  0.05   2.20
1.00    2.11  300.   10.0  276.4    2.0
 13 01 01   1 22 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.05   2.20
1.00    0.00    0.   10.0  275.9    2.0
 13 01 01   1 23  -24.0  0.230 -9.000 -9.000 -999.  264.     57.9  0.04   2.20
1.00    3.36   80.   10.0  274.2    2.0
 13 01 01   1 24  -16.1  0.169 -9.000 -9.000 -999.  167.     31.3  0.06   2.20
1.00    2.36  100.   10.0  274.2    2.0


 First hour of profile data
 YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
 13 01 01 01   10.0 1  149.    2.78   273.8   99.0  -99.00  -99.00

 F indicates top of profile (=1) or below (=0)
```



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                                *** THE PERIOD ( 43824 HRS) AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP: VOL1      ***
                                    INCLUDING SOURCE(S):     VOL1         ,

                                             *** DISCRETE CARTESIAN RECEPTOR POINTS
```

***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649676.34	4188314.55	3.17886	649629.66	4188294.84	2.81498
649810.15	4188312.48	4.33466	649364.10	4188360.20	1.88281
649327.80	4188355.01	1.77280	649380.70	4188758.52	1.84706
650495.81	4188841.51	4.28073	650597.47	4188832.17	3.93483
650536.27	4188878.85	3.56783	650577.76	4188877.81	3.42873
650602.66	4188860.18	3.53924	650610.95	4188880.93	3.26850
650638.10	4188858.53	3.40358	650664.10	4188331.03	21.36195
650668.72	4188350.83	21.42188	650677.96	4188379.86	20.70636
650699.74	4188414.84	18.04783	650758.47	4188658.36	5.99965
650765.73	4188678.82	5.40633	650773.65	4188706.54	4.74863
650778.27	4188726.34	4.35960	650805.33	4188805.53	3.18808
650806.65	4188824.01	3.00930	650811.27	4188843.81	2.82339
650814.57	4188862.29	2.66944	650846.24	4188924.98	2.18464
650850.86	4188951.38	2.03971	650854.82	4188976.46	1.91630
650698.00	4188307.32	17.19609	650692.60	4188291.80	17.10889
650724.82	4189245.80	1.23247	650726.07	4189273.37	1.17147
650856.27	4189006.30	1.78991	650857.23	4189022.60	1.72624
650859.15	4189041.29	1.65647	650859.15	4189058.54	1.59875
650860.58	4189076.28	1.54084	650861.54	4189094.49	1.48561
650857.71	4189113.19	1.43818	650847.16	4189118.94	1.43550
650848.12	4189134.76	1.39223	650850.04		

4189155.37   1.33808
          650851.48   4189171.66   1.29761   650853.87
4189184.12   1.26667
          650856.75   4189199.46   1.23019   650857.71
4189213.36   1.19992
          650860.58   4189226.30   1.17113   650862.50
4189242.60   1.13767
          650865.38   4189258.42   1.10583   650867.77
4189275.19   1.07402
          650868.73   4189291.49   1.04532   650872.09
4189309.23   1.01398
          650874.00   4189325.04   0.98792   650875.92
4189340.38   0.96358
          650878.80   4189355.24   0.94035   650881.19
4189373.45   0.91366
          650884.55   4189390.71   0.88893   650888.86
4189407.01   0.86604
          650889.82   4189427.14   0.84094   650891.74
4189443.43   0.82100
          650895.09   4189461.17   0.79964   650898.45
4189475.55   0.78273
          650898.45   4189489.93   0.76764   650902.28
4189504.31   0.75163
          650709.41   4188344.56   17.06524   650722.45
4188284.03   14.75034
          650745.73   4188280.30   13.28972   650735.49
4188223.50   12.26662
          650721.52   4188167.62   10.82224   650525.76
4188133.34   12.79783
          651125.76   4188133.34   3.87169   649125.76
4188183.34   1.18255
          649225.76   4188183.34   1.33591   649325.76
4188183.34   1.52301
          649425.76   4188183.34   1.75398   649525.76
4188183.34   2.04325
          649625.76   4188183.34   2.41298   649725.76
4188183.34   2.89948
          649825.76   4188183.34   3.56054   649925.76
4188183.34   4.47388

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1   ***
INCLUDING SOURCE(S):   VOL1   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650025.76	4188183.34	5.72299	650125.76	4188183.34	7.55527
650225.76	4188183.34	10.88539	650325.76	4188183.34	14.88797
650425.76	4188183.34	16.92231	650525.76	4188183.34	17.11096
650625.76	4188183.34	14.40536	650725.76	4188183.34	11.26403
650825.76	4188183.34	8.49856	651125.76	4188183.34	3.99264
649125.76	4188233.34	1.22716	649225.76	4188233.34	1.39059
649325.76	4188233.34	1.59195	649425.76	4188233.34	1.84404
649525.76	4188233.34	2.16523	649625.76	4188233.34	2.58269
649725.76	4188233.34	3.13927	649825.76	4188233.34	3.90757
649925.76	4188233.34	5.01379	650025.76	4188233.34	6.65512
650125.76	4188233.34	9.14189	650225.76	4188233.34	13.66522
650325.76	4188233.34	20.87001	650425.76	4188233.34	25.17975
650525.76	4188233.34	23.96208	650625.76	4188233.34	18.33298
650725.76	4188233.34	13.00909	650825.76	4188233.34	9.23105
651125.76	4188233.34	4.08713	649125.76	4188283.34	1.27356
649225.76	4188283.34	1.44784	649325.76	4188283.34	1.66373
649425.76	4188283.34	1.93630	649525.76	4188283.34	2.28803
649625.76	4188283.34	2.75356	649725.76	4188283.34	3.38834
649825.76	4188283.34	4.28613	649925.76	4188283.34	5.61852
650025.76	4188283.34	7.72063	650125.76		

4188283.34 11.23886
650225.76 4188283.34 17.86116 650325.76
4188283.34 31.59663
650425.76 4188283.34 42.08194 650525.76
4188283.34 35.08637
650625.76 4188283.34 22.79576 650725.76
4188283.34 14.52431
650825.76 4188283.34 9.79288 651125.76
4188283.34 4.14689
649125.76 4188333.34 1.31918 649225.76
4188333.34 1.50511
649325.76 4188333.34 1.73675 649425.76
4188333.34 2.03115
649525.76 4188333.34 2.41441 649625.76
4188333.34 2.92807
649725.76 4188333.34 3.64161 649825.76
4188333.34 4.67820
649925.76 4188333.34 6.27372 650025.76
4188333.34 8.92948
650125.76 4188333.34 13.85270 650225.76
4188333.34 24.50193
650325.76 4188333.34 55.04523 650425.76
4188333.34 85.81087
650525.76 4188333.34 51.60304 650625.76
4188333.34 26.82172
650725.76 4188333.34 15.57474 650825.76
4188333.34 10.12759
651125.76 4188333.34 4.15801 649125.76
4188383.34 1.36116
649225.76 4188383.34 1.55812 649325.76
4188383.34 1.80503
649425.76 4188383.34 2.12112 649525.76
4188383.34 2.53619
649625.76 4188383.34 3.09853 649725.76
4188383.34 3.89103
649825.76 4188383.34 5.06650 649925.76
4188383.34 6.93420
650025.76 4188383.34 10.20530 650125.76
4188383.34 16.85414
650225.76 4188383.34 34.35059 650325.76
4188383.34 118.70330

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION

VALUES FOR SOURCE GROUP: VOL1 ***
INCLUDING SOURCE(S): VOL1 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS
***

** CONC OF OTHER IN MICROGRAMS/M**3
**

X-COORD (M) Y-COORD (M) CONC X-COORD (M)
Y-COORD (M) CONC
- -

650425.76 4188383.34 0.00000 650525.76
4188383.34 68.99120
650625.76 4188383.34 29.05155 650725.76
4188383.34 15.92582
650825.76 4188383.34 10.15734 651125.76
4188383.34 4.11435
649125.76 4188433.34 1.39675 649225.76
4188433.34 1.60246
649325.76 4188433.34 1.86146 649425.76
4188433.34 2.19477
649525.76 4188433.34 2.63526 649625.76
4188433.34 3.23682
649725.76 4188433.34 4.09335 649825.76
4188433.34 5.38160
649925.76 4188433.34 7.47032 650025.76
4188433.34 11.24952
650125.76 4188433.34 19.40688 650225.76
4188433.34 44.15056
650325.76 4188433.34 0.00000 650425.76
4188433.34 0.00000
650525.76 4188433.34 72.28796 650625.76
4188433.34 28.22045
650725.76 4188433.34 15.38260 650825.76
4188433.34 9.83764
651125.76 4188433.34 4.02218 649125.76
4188483.34 1.42201
649225.76 4188483.34 1.63249 649325.76
4188483.34 1.89761
649425.76 4188483.34 2.23898 649525.76
4188483.34 2.69037
649625.76 4188483.34 3.30715 649725.76
4188483.34 4.18593
650425.76 4188483.34 0.00000 650525.76
4188483.34 53.52462
650625.76 4188483.34 24.03494 650725.76
4188483.34 13.88538
650825.76 4188483.34 9.14839 651125.76

```
4188483.34        3.88105
         649125.76    4188533.34        1.43149                       649225.76
4188533.34        1.64100
         649325.76    4188533.34        1.90391                       649425.76
4188533.34        2.24092
         649525.76    4188533.34        2.68419                       649625.76
4188533.34        3.28618
         649725.76    4188533.34        4.13760                       650425.76
4188533.34       64.20726
         650525.76    4188533.34       31.31016                       650625.76
4188533.34       18.11002
         650725.76    4188533.34       11.65529                       650825.76
4188533.34        8.10942
         651125.76    4188533.34        3.67694                       649125.76
4188583.34        1.42097
         649225.76    4188583.34        1.62365                       649325.76
4188583.34        1.87669
         649425.76    4188583.34        2.19937                       649525.76
4188583.34        2.62164
         649625.76    4188583.34        3.19193                       649725.76
4188583.34        3.99226
         650425.76    4188583.34       27.36469                       650525.76
4188583.34       18.53854
         650625.76    4188583.34       12.87742                       650725.76
4188583.34        9.28504
         650825.76    4188583.34        6.90245                       651125.76
4188583.34        3.40857
         649125.76    4188633.34        1.39243                       649225.76
4188633.34        1.58572
         649325.76    4188633.34        1.82676                       649425.76
4188633.34        2.13394
         649525.76    4188633.34        2.53518                       649625.76
4188633.34        3.07388
         649725.76    4188633.34        3.81932                       649825.76
4188633.34        4.88613
         649925.76    4188633.34        6.47125                       650025.76
4188633.34        8.94589
         650125.76    4188633.34       13.10152                       650225.76
4188633.34       18.87239
         650325.76    4188633.34       19.76408                       650425.76
4188633.34       16.03700
         650525.76    4188633.34       12.28390                       650625.76
4188633.34        9.30563
```

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1 ***
INCLUDING SOURCE(S): VOL1 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650725.76	4188633.34	7.25697	650825.76	4188633.34	5.74610
651125.76	4188633.34	3.10398	649125.76	4188683.34	1.35560
649225.76	4188683.34	1.54149	649325.76	4188683.34	1.77364
649425.76	4188683.34	2.06882	649525.76	4188683.34	2.45092
649625.76	4188683.34	2.95480	649725.76	4188683.34	3.63310
649825.76	4188683.34	4.56740	649925.76	4188683.34	5.89206
650025.76	4188683.34	7.88298	650125.76	4188683.34	10.87060
650225.76	4188683.34	13.44324	650325.76	4188683.34	12.59596
650425.76	4188683.34	10.75885	650525.76	4188683.34	8.84657
650625.76	4188683.34	7.05404	650725.76	4188683.34	5.72657
650825.76	4188683.34	4.74382	651125.76	4188683.34	2.80045
649125.76	4188733.34	1.32157	649225.76	4188733.34	1.50267
649325.76	4188733.34	1.72726	649425.76	4188733.34	2.00872
649525.76	4188733.34	2.36548	649625.76	4188733.34	2.82412
649725.76	4188733.34	3.42360	649825.76	4188733.34	4.22196
649925.76	4188733.34	5.32929	650025.76	4188733.34	6.94956
650125.76	4188733.34	8.90104	650225.76	4188733.34	9.76400
650325.76	4188733.34	8.79703	650425.76		

4188733.34 7.79849
650525.76 4188733.34 6.71310 650625.76
4188733.34 5.57506
650725.76 4188733.34 4.64059 650825.76
4188733.34 3.93530
651125.76 4188733.34 2.51757 649125.76
4188783.34 1.29390
649225.76 4188783.34 1.46890 649325.76
4188783.34 1.68199
649425.76 4188783.34 1.94355 649525.76
4188783.34 2.26841
649625.76 4188783.34 2.67754 649725.76
4188783.34 3.19947
649825.76 4188783.34 3.88298 649925.76
4188783.34 4.83325
650025.76 4188783.34 6.10541 650125.76
4188783.34 7.20649
650225.76 4188783.34 7.31749 650325.76
4188783.34 6.54318
650425.76 4188783.34 5.95372 650525.76
4188783.34 5.28615
650625.76 4188783.34 4.53609 650725.76
4188783.34 3.85998
650825.76 4188783.34 3.31983 651125.76
4188783.34 2.25548
649125.76 4188833.34 1.26771 649225.76
4188833.34 1.43253
649325.76 4188833.34 1.62976 649425.76
4188833.34 1.86853
649525.76 4188833.34 2.16124 649625.76
4188833.34 2.52329
649725.76 4188833.34 2.97808 649825.76
4188833.34 3.57862
649925.76 4188833.34 4.39648 650025.76
4188833.34 5.30588
650125.76 4188833.34 5.82895 650225.76
4188833.34 5.66565
650325.76 4188833.34 5.09083 650425.76
4188833.34 4.71923
650525.76 4188833.34 4.28202 650625.76
4188833.34 3.77056
650725.76 4188833.34 3.27207 650825.76
4188833.34 2.85387
651125.76 4188833.34 2.01240 649125.76
4188883.34 1.23701

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1 ***
INCLUDING SOURCE(S): VOL1 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649225.76	4188883.34	1.38933	649325.76	4188883.34	1.57025
649425.76	4188883.34	1.78762	649525.76	4188883.34	2.05033
649625.76	4188883.34	2.37030	649725.76	4188883.34	2.77464
649825.76	4188883.34	3.31418	649925.76	4188883.34	3.98435
650025.76	4188883.34	4.56086	650125.76	4188883.34	4.75582
650225.76	4188883.34	4.51491	650325.76	4188883.34	4.09578
650425.76	4188883.34	3.84874	650525.76	4188883.34	3.54722
650625.76	4188883.34	3.18748	650725.76	4188883.34	2.81448
650825.76	4188883.34	2.48727	651125.76	4188883.34	1.79407
650125.76	4188933.34	3.93276	650225.76	4188933.34	3.68622
650325.76	4188933.34	3.38138	650425.76	4188933.34	3.20974
650525.76	4188933.34	2.99247	650625.76	4188933.34	2.73233
650725.76	4188933.34	2.45079	650825.76	4188933.34	2.18869
651125.76	4188933.34	1.60744	650425.76	4188983.34	2.72544
650525.76	4188983.34	2.56300	650625.76	4188983.34	2.37022
650725.76	4188983.34	2.15561	650825.76	4188983.34	1.94264
651125.76	4188983.34	1.45331	650525.76		

4189033.34 2.22350
650625.76 4189033.34 2.07733 650725.76
4189033.34 1.91146
650825.76 4189033.34 1.73886 651125.76
4189033.34 1.32635
650525.76 4189083.34 1.95038 650625.76
4189083.34 1.83687
650725.76 4189083.34 1.70692 650825.76
4189083.34 1.56789
651125.76 4189083.34 1.21908 650525.76
4189133.34 1.72726
650625.76 4189133.34 1.63683 650725.76
4189133.34 1.53412
650825.76 4189133.34 1.42176 651125.76
4189133.34 1.12496
650781.98 4189510.65 0.78373 650760.33
4189397.50 0.93604

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2 ***
INCLUDING SOURCE(S): VOL2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC
- -
649676.34 4188314.55 33.87899 649629.66
4188294.84 21.15952
649810.15 4188312.48 79.34923 649364.10
4188360.20 7.73569
649327.80 4188355.01 6.73633 649380.70
4188758.52 5.56104
650495.81 4188841.51 1.96862 650597.47
4188832.17 1.81267
650536.27 4188878.85 1.73706 650577.76
4188877.81 1.67592
650602.66 4188860.18 1.70016 650610.95

4188880.93 1.61532
650638.10 4188858.53 1.64865 650664.10
4188331.03 3.11342
650668.72 4188350.83 3.07133 650677.96
4188379.86 2.98946
650699.74 4188414.84 2.82815 650758.47
4188658.36 2.01682
650765.73 4188678.82 1.93522 650773.65
4188706.54 1.83426
650778.27 4188726.34 1.76791 650805.33
4188805.53 1.51569
650806.65 4188824.01 1.47154 650811.27
4188843.81 1.42084
650814.57 4188862.29 1.37651 650846.24
4188924.98 1.21324
650850.86 4188951.38 1.15952 650854.82
4188976.46 1.11070
650698.00 4188307.32 2.92717 650692.60
4188291.80 2.96080
650724.82 4189245.80 0.81555 650726.07
4189273.37 0.78752
650856.27 4189006.30 1.05751 650857.23
4189022.60 1.02937
650859.15 4189041.29 0.99763 650859.15
4189058.54 0.97056
650860.58 4189076.28 0.94297 650861.54
4189094.49 0.91620
650857.71 4189113.19 0.89267 650847.16
4189118.94 0.89078
650848.12 4189134.76 0.86979 650850.04
4189155.37 0.84357
650851.48 4189171.66 0.82401 650853.87
4189184.12 0.80904
650856.75 4189199.46 0.79139 650857.71
4189213.36 0.77687
650860.58 4189226.30 0.76291 650862.50
4189242.60 0.74685
650865.38 4189258.42 0.73146 650867.77
4189275.19 0.71613
650868.73 4189291.49 0.70246 650872.09
4189309.23 0.68717
650874.00 4189325.04 0.67453 650875.92
4189340.38 0.66264
650878.80 4189355.24 0.65106 650881.19
4189373.45 0.63776
650884.55 4189390.71 0.62514 650888.86
4189407.01 0.61316
650889.82 4189427.14 0.60029 650891.74
4189443.43 0.58973
650895.09 4189461.17 0.57807 650898.45

```
4189475.55        0.56864
         650898.45    4189489.93        0.56031                            650902.28
4189504.31        0.55105
         650709.41    4188344.56        2.84592                            650722.45
4188284.03        2.80191
         650745.73    4188280.30        2.68702                            650735.49
4188223.50        2.72437
         650721.52    4188167.62        2.75311                            650525.76
4188133.34        3.94406
         651125.76    4188133.34        1.51395                            649125.76
4188183.34        2.95255
         649225.76    4188183.34        3.63714                            649325.76
4188183.34        4.59801
         649425.76    4188183.34        5.94775                            649525.76
4188183.34        7.91642
         649625.76    4188183.34       11.48611                            649725.76
4188183.34       16.35374
         649825.76    4188183.34       18.95305                            649925.76
4188183.34       19.05660
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 *** MODELOPTs:    NonDFAULT  CONC  FLAT  RURAL  ADJ_U*

                                          *** THE PERIOD ( 43824 HRS) AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP: VOL2        ***
                                              INCLUDING SOURCE(S):     VOL2         ,

                                                         *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                                    ** CONC OF OTHER    IN MICROGRAMS/M**3
                              **

       X-COORD (M)   Y-COORD (M)        CONC                             X-COORD (M)
Y-COORD (M)        CONC
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - -
         650025.76    4188183.34       15.71655                            650125.76
4188183.34       11.96681
         650225.76    4188183.34        8.84872                            650325.76
4188183.34        6.63257
         650425.76    4188183.34        5.11472                            650525.76
4188183.34        4.05922
         650625.76    4188183.34        3.30337                            650725.76
4188183.34        2.74572
         650825.76    4188183.34        2.32296                            651125.76
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4188183.34 1.52402
649125.76 4188233.34 3.19338 649225.76
4188233.34 3.99064
649325.76 4188233.34 5.14720 649425.76
4188233.34 6.89965
649525.76 4188233.34 9.62693 649625.76
4188233.34 14.54632
649725.76 4188233.34 23.29348 649825.76
4188233.34 29.10509
649925.76 4188233.34 27.21619 650025.76
4188233.34 20.01226
650125.76 4188233.34 13.72709 650225.76
4188233.34 9.55414
650325.76 4188233.34 6.94719 650425.76
4188233.34 5.27249
650525.76 4188233.34 4.14569 650625.76
4188233.34 3.35391
650725.76 4188233.34 2.77636 650825.76
4188233.34 2.34159
651125.76 4188233.34 1.52633 649125.76
4188283.34 3.43994
649225.76 4188283.34 4.36860 649325.76
4188283.34 5.75956
649425.76 4188283.34 7.98535 649525.76
4188283.34 11.82794
649625.76 4188283.34 19.25100 649725.76
4188283.34 36.18937
649825.76 4188283.34 51.39279 649925.76
4188283.34 40.50726
650025.76 4188283.34 24.66881 650125.76
4188283.34 15.17722
650225.76 4188283.34 10.06874 650325.76
4188283.34 7.16051
650425.76 4188283.34 5.37023 650525.76
4188283.34 4.19259
650625.76 4188283.34 3.37591 650725.76
4188283.34 2.78511
650825.76 4188283.34 2.34295 651125.76
4188283.34 1.51993
649125.76 4188333.34 3.69039 649225.76
4188333.34 4.75550
649325.76 4188333.34 6.40890 649425.76
4188333.34 9.19867
649525.76 4188333.34 14.50431 649625.76
4188333.34 26.58858
649725.76 4188333.34 66.40581 649825.76
4188333.34 115.66569
649925.76 4188333.34 59.35489 650025.76
4188333.34 28.49179
650125.76 4188333.34 16.07340 650225.76

4188333.34 10.32503
650325.76 4188333.34 7.23684 650425.76
4188333.34 5.38634
650525.76 4188333.34 4.18652 650625.76
4188333.34 3.36155
650725.76 4188333.34 2.76811 650825.76
4188333.34 2.32575
651125.76 4188333.34 1.50625 649125.76
4188383.34 3.92745
649225.76 4188383.34 5.12482 649325.76
4188383.34 7.03674
649425.76 4188383.34 10.41404 649525.76
4188383.34 17.39565
649625.76 4188383.34 36.56392 649725.76
4188383.34 0.00000
649825.76 4188383.34 0.00000 649925.76
4188383.34 75.69188
650025.76 4188383.34 29.97742 650125.76
4188383.34 16.16770
650225.76 4188383.34 10.24658 650325.76
4188383.34 7.14784

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2 ***
INCLUDING SOURCE(S): VOL2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC
- -
650425.76 4188383.34 5.31101 650525.76
4188383.34 4.12592
650625.76 4188383.34 3.31306 650725.76
4188383.34 2.72904
650825.76 4188383.34 2.29394 651125.76
4188383.34 1.48793
649125.76 4188433.34 4.09850 649225.76

4188433.34 5.38675
649325.76 4188433.34 7.47396 649425.76
4188433.34 11.24624
649525.76 4188433.34 19.37265 649625.76
4188433.34 43.87140
649725.76 4188433.34 0.00000 649825.76
4188433.34 0.00000
649925.76 4188433.34 71.42414 650025.76
4188433.34 27.95271
650125.76 4188433.34 15.29271 650225.76
4188433.34 9.80085
650325.76 4188433.34 6.89117 650425.76
4188433.34 5.14954
650525.76 4188433.34 4.01748 650625.76
4188433.34 3.23650
650725.76 4188433.34 2.67283 650825.76
4188433.34 2.25135
651125.76 4188433.34 1.46661 649125.76
4188483.34 4.14584
649225.76 4188483.34 5.43779 649325.76
4188483.34 7.52052
649425.76 4188483.34 11.24996 649525.76
4188483.34 19.10168
649625.76 4188483.34 41.03794 649725.76
4188483.34 130.57562
650425.76 4188483.34 4.89254 650525.76
4188483.34 3.85514
650625.76 4188483.34 3.12782 650725.76
4188483.34 2.59666
650825.76 4188483.34 2.19594 651125.76
4188483.34 1.44144
649125.76 4188533.34 4.06011 649225.76
4188533.34 5.28197
649325.76 4188533.34 7.21659 649425.76
4188533.34 10.55872
649525.76 4188533.34 17.07083 649625.76
4188533.34 32.01676
649725.76 4188533.34 57.93812 650425.76
4188533.34 4.52709
650525.76 4188533.34 3.62536 650625.76
4188533.34 2.97579
650725.76 4188533.34 2.49180 650825.76
4188533.34 2.12106
651125.76 4188533.34 1.40944 649125.76
4188583.34 3.90282
649225.76 4188583.34 5.02943 649325.76
4188583.34 6.75592
649425.76 4188583.34 9.56368 649525.76
4188583.34 14.53751
649625.76 4188583.34 23.39309 649725.76

4188583.34 28.97272
650425.76 4188583.34 4.08468 650525.76
4188583.34 3.33682
650625.76 4188583.34 2.78027 650725.76
4188583.34 2.35505
650825.76 4188583.34 2.02275 651125.76
4188583.34 1.36769
649125.76 4188633.34 3.72968 649225.76
4188633.34 4.74210
649325.76 4188633.34 6.21997 649425.76
4188633.34 8.48439
649525.76 4188633.34 12.17934 649625.76
4188633.34 16.78164
649725.76 4188633.34 17.00003 649825.76
4188633.34 14.06344
649925.76 4188633.34 11.08611 650025.76
4188633.34 8.54761
650125.76 4188633.34 6.76726 650225.76
4188633.34 5.44856
650325.76 4188633.34 4.42148 650425.76
4188633.34 3.62945
650525.76 4188633.34 3.02478 650625.76
4188633.34 2.55945

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2 ***
INCLUDING SOURCE(S): VOL2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC
- -
650725.76 4188633.34 2.19518 650825.76
4188633.34 1.90481
651125.76 4188633.34 1.31544 649125.76
4188683.34 3.54000
649225.76 4188683.34 4.41903 649325.76

4188683.34 5.65015
649425.76 4188683.34 7.48381 649525.76
4188683.34 10.10749
649625.76 4188683.34 12.07443 649725.76
4188683.34 11.19883
649825.76 4188683.34 9.68918 649925.76
4188683.34 8.12036
650025.76 4188683.34 6.56786 650125.76
4188683.34 5.37382
650225.76 4188683.34 4.49128 650325.76
4188683.34 3.78825
650425.76 4188683.34 3.20285 650525.76
4188683.34 2.72327
650625.76 4188683.34 2.33772 650725.76
4188683.34 2.02818
650825.76 4188683.34 1.77717 651125.76
4188683.34 1.25469
649125.76 4188733.34 3.32787 649225.76
4188733.34 4.07783
649325.76 4188733.34 5.11491 649425.76
4188733.34 6.60710
649525.76 4188733.34 8.27367 649625.76
4188733.34 8.87962
649725.76 4188733.34 7.99377 649825.76
4188733.34 7.14654
649925.76 4188733.34 6.23314 650025.76
4188733.34 5.23947
650125.76 4188733.34 4.39124 650225.76
4188733.34 3.73943
650325.76 4188733.34 3.23486 650425.76
4188733.34 2.81220
650525.76 4188733.34 2.44422 650625.76
4188733.34 2.12996
650725.76 4188733.34 1.86773 650825.76
4188733.34 1.65058
651125.76 4188733.34 1.18916 649125.76
4188783.34 3.10612
649225.76 4188783.34 3.75222 649325.76
4188783.34 4.64830
649425.76 4188783.34 5.80068 649525.76
4188783.34 6.70985
649625.76 4188783.34 6.73588 649725.76
4188783.34 6.03619
649825.76 4188783.34 5.52439 649925.76
4188783.34 4.95109
650025.76 4188783.34 4.29080 650125.76
4188783.34 3.67502
650225.76 4188783.34 3.17341 650325.76
4188783.34 2.77768
650425.76 4188783.34 2.46084 650525.76

4188783.34 2.18508
650625.76 4188783.34 1.93730 650725.76
4188783.34 1.71912
650825.76 4188783.34 1.53183 651125.76
4188783.34 1.12288
649125.76 4188833.34 2.89165 649225.76
4188833.34 3.46450
649325.76 4188833.34 4.23114 649425.76
4188833.34 5.03403
649525.76 4188833.34 5.44932 649625.76
4188833.34 5.26968
649725.76 4188833.34 4.74826 649825.76
4188833.34 4.42024
649925.76 4188833.34 4.03828 650025.76
4188833.34 3.58430
650125.76 4188833.34 3.12904 650225.76
4188833.34 2.74064
650325.76 4188833.34 2.41749 650425.76
4188833.34 2.15962
650525.76 4188833.34 1.94672 650625.76
4188833.34 1.75579
650725.76 4188833.34 1.58020 650825.76
4188833.34 1.42195
651125.76 4188833.34 1.05913 649125.76
4188883.34 2.69783

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2 ***
INCLUDING SOURCE(S): VOL2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC
- -
649225.76 4188883.34 3.21332 649325.76
4188883.34 3.83056
649425.76 4188883.34 4.32597 649525.76

4188883.34 4.46952
649625.76 4188883.34 4.23511 649725.76
4188883.34 3.85216
649825.76 4188883.34 3.63143 649925.76
4188883.34 3.36404
650025.76 4188883.34 3.04215 650125.76
4188883.34 2.70140
650225.76 4188883.34 2.39548 650325.76
4188883.34 2.13413
650425.76 4188883.34 1.91367 650525.76
4188883.34 1.73655
650625.76 4188883.34 1.58591 650725.76
4188883.34 1.44763
650825.76 4188883.34 1.31819 651125.76
4188883.34 0.99972
650125.76 4188933.34 2.35936 650225.76
4188933.34 2.11301
650325.76 4188933.34 1.90294 650425.76
4188933.34 1.71586
650525.76 4188933.34 1.55983 650625.76
4188933.34 1.43284
650725.76 4188933.34 1.32186 650825.76
4188933.34 1.21810
651125.76 4188933.34 0.94472 650425.76
4188983.34 1.55299
650525.76 4188983.34 1.41469 650625.76
4188983.34 1.30094
650725.76 4188983.34 1.20657 650825.76
4188983.34 1.12212
651125.76 4188983.34 0.89282 650525.76
4189033.34 1.29439
650625.76 4189033.34 1.19041 650725.76
4189033.34 1.10519
650825.76 4189033.34 1.03291 651125.76
4189033.34 0.84240
650525.76 4189083.34 1.19137 650625.76
4189083.34 1.09795
650725.76 4189083.34 1.01861 650825.76
4189083.34 0.95313
651125.76 4189083.34 0.79266 650525.76
4189133.34 1.09985
650625.76 4189133.34 1.01898 650725.76
4189133.34 0.94536
650825.76 4189133.34 0.88383 651125.76
4189133.34 0.74394
650781.98 4189510.65 0.57575 650760.33
4189397.50 0.66456

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PAGE 22
*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP: VOL3 ***
INCLUDING SOURCE(S): VOL3 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS
***

** CONC OF OTHER IN MICROGRAMS/M**3
**

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649676.34	4188314.55	9.98764	649629.66	4188294.84	8.12311
649810.15	4188312.48	11.52187	649364.10	4188360.20	4.75178
649327.80	4188355.01	4.31161	649380.70	4188758.52	8.50456
650495.81	4188841.51	3.14728	650597.47	4188832.17	2.69525
650536.27	4188878.85	2.71563	650577.76	4188877.81	2.54997
650602.66	4188860.18	2.53762	650610.95	4188880.93	2.40977
650638.10	4188858.53	2.40974	650664.10	4188331.03	3.00590
650668.72	4188350.83	3.00567	650677.96	4188379.86	2.98686
650699.74	4188414.84	2.89867	650758.47	4188658.36	2.49311
650765.73	4188678.82	2.43348	650773.65	4188706.54	2.35703
650778.27	4188726.34	2.30322	650805.33	4188805.53	2.03584
650806.65	4188824.01	1.98520	650811.27	4188843.81	1.92107
650814.57	4188862.29	1.86396	650846.24	4188924.98	1.63562
650850.86	4188951.38	1.56519	650854.82	4188976.46	1.50226
650698.00	4188307.32	2.80084	650692.60	4188291.80	2.80687
650724.82	4189245.80	1.08672	650726.07		

4189273.37 1.03794
650856.27 4189006.30 1.43650 650857.23
4189022.60 1.40172
650859.15 4189041.29 1.36179 650859.15
4189058.54 1.32828
650860.58 4189076.28 1.29264 650861.54
4189094.49 1.25736
650857.71 4189113.19 1.22695 650847.16
4189118.94 1.22756
650848.12 4189134.76 1.19677 650850.04
4189155.37 1.15671
650851.48 4189171.66 1.12578 650853.87
4189184.12 1.10152
650856.75 4189199.46 1.07242 650857.71
4189213.36 1.04795
650860.58 4189226.30 1.02434 650862.50
4189242.60 0.99665
650865.38 4189258.42 0.97008 650867.77
4189275.19 0.94340
650868.73 4189291.49 0.91931 650872.09
4189309.23 0.89297
650874.00 4189325.04 0.87114 650875.92
4189340.38 0.85085
650878.80 4189355.24 0.83152 650881.19
4189373.45 0.80952
650884.55 4189390.71 0.78921 650888.86
4189407.01 0.77042
650889.82 4189427.14 0.75039 650891.74
4189443.43 0.73450
650895.09 4189461.17 0.71745 650898.45
4189475.55 0.70394
650898.45 4189489.93 0.69236 650902.28
4189504.31 0.67960
650709.41 4188344.56 2.78784 650722.45
4188284.03 2.65860
650745.73 4188280.30 2.55403 650735.49
4188223.50 2.52499
650721.52 4188167.62 2.49239 650525.76
4188133.34 3.22934
651125.76 4188133.34 1.43944 649125.76
4188183.34 2.15334
649225.76 4188183.34 2.48010 649325.76
4188183.34 2.89100
649425.76 4188183.34 3.48684 649525.76
4188183.34 4.40262
649625.76 4188183.34 5.53061 649725.76
4188183.34 6.08776
649825.76 4188183.34 6.32118 649925.76
4188183.34 6.82259
↑ *** AERMOD - VERSION 19191 *** *** C:\Users\Smith\Dropbox\My PC

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3 ***
INCLUDING SOURCE(S): VOL3 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650025.76	4188183.34	6.61625	650125.76	4188183.34	6.00279
650225.76	4188183.34	5.40258	650325.76	4188183.34	4.72209
650425.76	4188183.34	4.04499	650525.76	4188183.34	3.43893
650625.76	4188183.34	2.92518	650725.76	4188183.34	2.50265
650825.76	4188183.34	2.15896	651125.76	4188183.34	1.46044
649125.76	4188233.34	2.33495	649225.76	4188233.34	2.73792
649325.76	4188233.34	3.22526	649425.76	4188233.34	3.90123
649525.76	4188233.34	4.97688	649625.76	4188233.34	6.48972
649725.76	4188233.34	7.43349	649825.76	4188233.34	7.82330
649925.76	4188233.34	8.41621	650025.76	4188233.34	7.94074
650125.76	4188233.34	7.09997	650225.76	4188233.34	6.19546
650325.76	4188233.34	5.23507	650425.76	4188233.34	4.36138
650525.76	4188233.34	3.63010	650625.76	4188233.34	3.04296
650725.76	4188233.34	2.57813	650825.76	4188233.34	2.20928
651125.76	4188233.34	1.47993	649125.76		

4188283.34 2.52179
649225.76 4188283.34 3.01585 649325.76
4188283.34 3.62624
649425.76 4188283.34 4.42566 649525.76
4188283.34 5.68923
649625.76 4188283.34 7.70406 649725.76
4188283.34 9.30317
649825.76 4188283.34 9.98479 649925.76
4188283.34 10.63775
650025.76 4188283.34 9.73193 650125.76
4188283.34 8.46513
650225.76 4188283.34 7.06798 650325.76
4188283.34 5.74576
650425.76 4188283.34 4.65065 650525.76
4188283.34 3.79721
650625.76 4188283.34 3.14450 650725.76
4188283.34 2.64313
650825.76 4188283.34 2.25306 651125.76
4188283.34 1.49799
649125.76 4188333.34 2.72119 649225.76
4188333.34 3.30781
649325.76 4188333.34 4.08164 649425.76
4188333.34 5.09378
649525.76 4188333.34 6.61190 649625.76
4188333.34 9.27628
649725.76 4188333.34 12.01002 649825.76
4188333.34 13.27410
649925.76 4188333.34 13.86341 650025.76
4188333.34 12.20215
650125.76 4188333.34 10.09155 650225.76
4188333.34 7.96944
650325.76 4188333.34 6.21641 650425.76
4188333.34 4.90067
650525.76 4188333.34 3.93887 650625.76
4188333.34 3.23043
650725.76 4188333.34 2.69860 650825.76
4188333.34 2.29105
651125.76 4188333.34 1.51342 649125.76
4188383.34 2.94317
649225.76 4188383.34 3.62377 649325.76
4188383.34 4.57719
649425.76 4188383.34 5.91204 649525.76
4188383.34 7.85905
649625.76 4188383.34 11.38792 649725.76
4188383.34 16.14259
649825.76 4188383.34 18.67285 649925.76
4188383.34 18.80664
650025.76 4188383.34 15.56022 650125.76
4188383.34 11.89170
650225.76 4188383.34 8.81638 650325.76

4188383.34 6.61793

↑ *** AERMOD - VERSION 19191 *** *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley *** 10/26/23
*** AERMET - VERSION 18081 *** *** *** 16:20:52

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3 ***
INCLUDING SOURCE(S): VOL3 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650425.76	4188383.34	5.10733	650525.76	4188383.34	4.05511
650625.76	4188383.34	3.30091	650725.76	4188383.34	2.74415
650825.76	4188383.34	2.32192	651125.76	4188383.34	1.52375
649125.76	4188433.34	3.18352	649225.76	4188433.34	3.97586
649325.76	4188433.34	5.12403	649425.76	4188433.34	6.85915
649525.76	4188433.34	9.54992	649625.76	4188433.34	14.40340
649725.76	4188433.34	22.93402	649825.76	4188433.34	28.55914
649925.76	4188433.34	26.80518	650025.76	4188433.34	19.82327
650125.76	4188433.34	13.65907	650225.76	4188433.34	9.52885
650325.76	4188433.34	6.93632	650425.76	4188433.34	5.26721
650525.76	4188433.34	4.14290	650625.76	4188433.34	3.35236
650725.76	4188433.34	2.77549	650825.76	4188433.34	2.34114
651125.76	4188433.34	1.52640	649125.76	4188483.34	3.42997
649225.76	4188483.34	4.35322	649325.76		

4188483.34 5.73416
649425.76 4188483.34 7.93948 649525.76
4188483.34 11.73148
649625.76 4188483.34 19.02810 649725.76
4188483.34 35.49091
650425.76 4188483.34 5.36777 650525.76
4188483.34 4.19167
650625.76 4188483.34 3.37570 650725.76
4188483.34 2.78525
650825.76 4188483.34 2.34326 651125.76
4188483.34 1.52035
649125.76 4188533.34 3.68035 649225.76
4188533.34 4.74001
649325.76 4188533.34 6.38280 649425.76
4188533.34 9.14908
649525.76 4188533.34 14.39134 649625.76
4188533.34 26.24989
649725.76 4188533.34 64.67384 650425.76
4188533.34 5.38754
650525.76 4188533.34 4.18790 650625.76
4188533.34 3.36287
650725.76 4188533.34 2.76929 650825.76
4188533.34 2.32678
651125.76 4188533.34 1.50693 649125.76
4188583.34 3.91863
649225.76 4188583.34 5.11108 649325.76
4188583.34 7.01342
649425.76 4188583.34 10.36891 649525.76
4188583.34 17.28721
649625.76 4188583.34 36.17104 649725.76
4188583.34 0.00000
650425.76 4188583.34 5.31588 650525.76
4188583.34 4.12942
650625.76 4188583.34 3.31565 650725.76
4188583.34 2.73102
650825.76 4188583.34 2.29549 651125.76
4188583.34 1.48875
649125.76 4188633.34 4.09341 649225.76
4188633.34 5.37934
649325.76 4188633.34 7.46234 649425.76
4188633.34 11.22592
649525.76 4188633.34 19.33046 649625.76
4188633.34 43.76064
649725.76 4188633.34 0.00000 649825.76
4188633.34 0.00000
649925.76 4188633.34 72.15382 650025.76
4188633.34 28.10931
650125.76 4188633.34 15.34833 650225.76
4188633.34 9.82653
650325.76 4188633.34 6.90505 650425.76

4188633.34 5.15787
650525.76 4188633.34 4.02287 650625.76
4188633.34 3.24020
↑ *** AERMOD - VERSION 19191 *** *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley *** 10/26/23
*** AERMET - VERSION 18081 *** ***
*** 16:20:52

PAGE 25
*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3 ***
INCLUDING SOURCE(S): VOL3 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650725.76	4188633.34	2.67548	650825.76	4188633.34	2.25332
651125.76	4188633.34	1.46755	649125.76	4188683.34	4.14643
649225.76	4188683.34	5.43993	649325.76	4188683.34	7.52629
649425.76	4188683.34	11.26590	649525.76	4188683.34	19.15664
649625.76	4188683.34	41.34569	649725.76	4188683.34	134.57865
649825.76	4188683.34	0.00000	649925.76	4188683.34	48.35776
650025.76	4188683.34	22.95905	650125.76	4188683.34	13.54404
650225.76	4188683.34	9.01007	650325.76	4188683.34	6.47380
650425.76	4188683.34	4.90504	650525.76	4188683.34	3.86295
650625.76	4188683.34	3.13299	650725.76	4188683.34	2.60024
650825.76	4188683.34	2.19852	651125.76	4188683.34	1.44257
649125.76	4188733.34	4.06552	649225.76	4188733.34	5.29108
649325.76	4188733.34	7.23342	649425.76		

4188733.34 10.59555
649525.76 4188733.34 17.17317 649625.76
4188733.34 32.41030
649725.76 4188733.34 59.89342 649825.76
4188733.34 49.40382
649925.76 4188733.34 27.36027 650025.76
4188733.34 16.78089
650125.76 4188733.34 11.13567 650225.76
4188733.34 7.87122
650325.76 4188733.34 5.86018 650425.76
4188733.34 4.54380
650525.76 4188733.34 3.63595 650625.76
4188733.34 2.98283
650725.76 4188733.34 2.49666 650825.76
4188733.34 2.12453
651125.76 4188733.34 1.41090 649125.76
4188783.34 3.90989
649225.76 4188783.34 5.04074 649325.76
4188783.34 6.77669
649425.76 4188783.34 9.60791 649525.76
4188783.34 14.64257
649625.76 4188783.34 23.70639 649725.76
4188783.34 29.72837
649825.76 4188783.34 23.40091 649925.76
4188783.34 16.57483
650025.76 4188783.34 11.85647 650125.76
4188783.34 8.76742
650225.76 4188783.34 6.63364 650325.76
4188783.34 5.14843
650425.76 4188783.34 4.10349 650525.76
4188783.34 3.34933
650625.76 4188783.34 2.78888 650725.76
4188783.34 2.36113
650825.76 4188783.34 2.02716 651125.76
4188783.34 1.36958
649125.76 4188833.34 3.73707 649225.76
4188833.34 4.75463
649325.76 4188833.34 6.24316 649425.76
4188833.34 8.52876
649525.76 4188833.34 12.27054 649625.76
4188833.34 17.01050
649725.76 4188833.34 17.34295 649825.76
4188833.34 14.31624
649925.76 4188833.34 11.24801 650025.76
4188833.34 8.65267
650125.76 4188833.34 6.83665 650225.76
4188833.34 5.49234
650325.76 4188833.34 4.44911 650425.76
4188833.34 3.64779
650525.76 4188833.34 3.03758 650625.76

4188833.34 2.56867
650725.76 4188833.34 2.20197 650825.76
4188833.34 1.90988
651125.76 4188833.34 1.31774 649125.76
4188883.34 3.54824

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3 ***
INCLUDING SOURCE(S): VOL3 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649225.76	4188883.34	4.43287	649325.76	4188883.34	5.67357
649425.76	4188883.34	7.52288	649525.76	4188883.34	10.18654
649625.76	4188883.34	12.23401	649725.76	4188883.34	11.37789
649825.76	4188883.34	9.82648	649925.76	4188883.34	8.21815
650025.76	4188883.34	6.63533	650125.76	4188883.34	5.42306
650225.76	4188883.34	4.52709	650325.76	4188883.34	3.81289
650425.76	4188883.34	3.21970	650525.76	4188883.34	2.73526
650625.76	4188883.34	2.34664	650725.76	4188883.34	2.03499
650825.76	4188883.34	1.78245	651125.76	4188883.34	1.25728
650125.76	4188933.34	4.42613	650225.76	4188933.34	3.76685
650325.76	4188933.34	3.25597	650425.76	4188933.34	2.82754
650525.76	4188933.34	2.45527	650625.76		

4188933.34 2.13819
650725.76 4188933.34 1.87412 650825.76
4188933.34 1.65567
651125.76 4188933.34 1.19188 650425.76
4188983.34 2.47443
650525.76 4188983.34 2.19533 650625.76
4188983.34 1.94496
650725.76 4188983.34 1.72501 650825.76
4188983.34 1.53654
651125.76 4188983.34 1.12557 650525.76
4189033.34 1.95603
650625.76 4189033.34 1.76302 650725.76
4189033.34 1.58575
650825.76 4189033.34 1.42632 651125.76
4189033.34 1.06167
650525.76 4189083.34 1.74461 650625.76
4189083.34 1.59260
650725.76 4189083.34 1.45294 650825.76
4189083.34 1.32236
651125.76 4189083.34 1.00208 650525.76
4189133.34 1.56651
650625.76 4189133.34 1.43876 650725.76
4189133.34 1.32684
650825.76 4189133.34 1.22213 651125.76
4189133.34 0.94691
650781.98 4189510.65 0.72839 650760.33
4189397.50 0.84794

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4 ***
INCLUDING SOURCE(S): VOL4 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC
- -
649676.34 4188314.55 2.42030 649629.66

4188294.84 2.17745
649810.15 4188312.48 3.08374 649364.10
4188360.20 1.58424
649327.80 4188355.01 1.50063 649380.70
4188758.52 2.05797
650495.81 4188841.51 11.80094 650597.47
4188832.17 9.58103
650536.27 4188878.85 8.43238 650577.76
4188877.81 7.72942
650602.66 4188860.18 8.03149 650610.95
4188880.93 7.06099
650638.10 4188858.53 7.45981 650664.10
4188331.03 10.99804
650668.72 4188350.83 11.84652 650677.96
4188379.86 13.04295
650699.74 4188414.84 13.84215 650758.47
4188658.36 12.41463
650765.73 4188678.82 11.48428 650773.65
4188706.54 10.29609
650778.27 4188726.34 9.49119 650805.33
4188805.53 6.49327
650806.65 4188824.01 6.01584 650811.27
4188843.81 5.50341
650814.57 4188862.29 5.08128 650846.24
4188924.98 3.80750
650850.86 4188951.38 3.45480 650854.82
4188976.46 3.16806
650698.00 4188307.32 9.43680 650692.60
4188291.80 8.96978
650724.82 4189245.80 1.82127 650726.07
4189273.37 1.71057
650856.27 4189006.30 2.88868 650857.23
4189022.60 2.75317
650859.15 4189041.29 2.60811 650859.15
4189058.54 2.49072
650860.58 4189076.28 2.37467 650861.54
4189094.49 2.26554
650857.71 4189113.19 2.17283 650847.16
4189118.94 2.16753
650848.12 4189134.76 2.08391 650850.04
4189155.37 1.98088
650851.48 4189171.66 1.90515 650853.87
4189184.12 1.84794
650856.75 4189199.46 1.78133 650857.71
4189213.36 1.72699
650860.58 4189226.30 1.67571 650862.50
4189242.60 1.61710
650865.38 4189258.42 1.56197 650867.77
4189275.19 1.50774
650868.73 4189291.49 1.45969 650872.09

4189309.23 1.40741
650874.00 4189325.04 1.36458 650875.92
4189340.38 1.32492
650878.80 4189355.24 1.28718 650881.19
4189373.45 1.24431
650884.55 4189390.71 1.20471 650888.86
4189407.01 1.16812
650889.82 4189427.14 1.12878 650891.74
4189443.43 1.09750
650895.09 4189461.17 1.06402 650898.45
4189475.55 1.03759
650898.45 4189489.93 1.01431 650902.28
4189504.31 0.98947
650709.41 4188344.56 10.60071 650722.45
4188284.03 8.33032
650745.73 4188280.30 7.92673 650735.49
4188223.50 6.64676
650721.52 4188167.62 5.62386 650525.76
4188133.34 5.55336
651125.76 4188133.34 3.19014 649125.76
4188183.34 1.01532
649225.76 4188183.34 1.12771 649325.76
4188183.34 1.26295
649425.76 4188183.34 1.42775 649525.76
4188183.34 1.62822
649625.76 4188183.34 1.86782 649725.76
4188183.34 2.14659
649825.76 4188183.34 2.46941 649925.76
4188183.34 2.88008

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4 ***
INCLUDING SOURCE(S): VOL4 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC
- -

-
650025.76 4188183.34 3.47894 650125.76
4188183.34 4.39242
650225.76 4188183.34 5.47962 650325.76
4188183.34 5.97956
650425.76 4188183.34 6.22010 650525.76
4188183.34 6.69677
650625.76 4188183.34 6.48260 650725.76
4188183.34 5.88672
650825.76 4188183.34 5.30470 651125.76
4188183.34 3.39754
649125.76 4188233.34 1.06038 649225.76
4188233.34 1.18173
649325.76 4188233.34 1.32668 649425.76
4188233.34 1.50357
649525.76 4188233.34 1.72316 649625.76
4188233.34 1.99630
649725.76 4188233.34 2.33019 649825.76
4188233.34 2.72722
649925.76 4188233.34 3.21026 650025.76
4188233.34 3.88847
650125.76 4188233.34 4.96603 650225.76
4188233.34 6.43517
650325.76 4188233.34 7.29090 650425.76
4188233.34 7.68162
650525.76 4188233.34 8.23595 650625.76
4188233.34 7.76202
650725.76 4188233.34 6.94876 650825.76
4188233.34 6.07628
651125.76 4188233.34 3.58740 649125.76
4188283.34 1.10478
649225.76 4188283.34 1.23762 649325.76
4188283.34 1.39606
649425.76 4188283.34 1.58839 649525.76
4188283.34 1.82740
649625.76 4188283.34 2.13096 649725.76
4188283.34 2.51919
649825.76 4188283.34 3.00767 649925.76
4188283.34 3.60895
650025.76 4188283.34 4.40540 650125.76
4188283.34 5.67449
650225.76 4188283.34 7.64742 650325.76
4188283.34 9.11057
650425.76 4188283.34 9.77586 650525.76
4188283.34 10.37002
650625.76 4188283.34 9.48550 650725.76
4188283.34 8.26749
650825.76 4188283.34 6.92599 651125.76
4188283.34 3.75388
649125.76 4188333.34 1.14754 649225.76

4188333.34 1.29216
649325.76 4188333.34 1.46653 649425.76
4188333.34 1.67923
649525.76 4188333.34 1.94334 649625.76
4188333.34 2.27965
649725.76 4188333.34 2.71961 649825.76
4188333.34 3.30308
649925.76 4188333.34 4.06672 650025.76
4188333.34 5.06572
650125.76 4188333.34 6.58675 650225.76
4188333.34 9.21885
650325.76 4188333.34 11.74236 650425.76
4188333.34 12.94415
650525.76 4188333.34 13.44902 650625.76
4188333.34 11.85076
650725.76 4188333.34 9.83767 650825.76
4188333.34 7.80662
651125.76 4188333.34 3.89540 649125.76
4188383.34 1.19047
649225.76 4188383.34 1.34566 649325.76
4188383.34 1.53539
649425.76 4188383.34 1.77028 649525.76
4188383.34 2.06537
649625.76 4188383.34 2.44352 649725.76
4188383.34 2.94190
649825.76 4188383.34 3.62108 649925.76
4188383.34 4.56795
650025.76 4188383.34 5.88308 650125.76
4188383.34 7.81530
650225.76 4188383.34 11.32691 650325.76
4188383.34 15.75822

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4 ***
INCLUDING SOURCE(S): VOL4 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M)

Y-COORD (M)   CONC
- -

```
         650425.76    4188383.34        18.09982                      650525.76
4188383.34       18.12909
         650625.76    4188383.34        15.05185                      650725.76
4188383.34       11.57960
         650825.76    4188383.34         8.63926                      651125.76
4188383.34        4.01199
         649125.76    4188433.34         1.23551                      649225.76
4188433.34        1.40084
         649325.76    4188433.34         1.60477                      649425.76
4188433.34        1.86055
         649525.76    4188433.34         2.18731                      649625.76
4188433.34        2.61358
         649725.76    4188433.34         3.18420                      649825.76
4188433.34        3.97495
         649925.76    4188433.34         5.11957                      650025.76
4188433.34        6.83924
         650125.76    4188433.34         9.49084                      650225.76
4188433.34       14.32207
         650325.76    4188433.34        22.35916                      650425.76
4188433.34       27.41590
         650525.76    4188433.34        25.61952                      650625.76
4188433.34       19.11096
         650725.76    4188433.34        13.30238                      650825.76
4188433.34        9.34593
         651125.76    4188433.34         4.10107                      649125.76
4188483.34        1.28195
         649225.76    4188483.34         1.45832                      649325.76
4188483.34        1.67704
         649425.76    4188483.34         1.95349                      649525.76
4188483.34        2.31086
         649625.76    4188483.34         2.78506                      649725.76
4188483.34        3.43414
         650425.76    4188483.34        47.22930                      650525.76
4188483.34       37.69430
         650625.76    4188483.34        23.57916                      650725.76
4188483.34       14.75385
         650825.76    4188483.34         9.87309                      651125.76
4188483.34        4.15295
         649125.76    4188533.34         1.32708                      649225.76
4188533.34        1.51509
         649325.76    4188533.34         1.74961                      649425.76
4188533.34        2.04808
         649525.76    4188533.34         2.43727                      649625.76
4188533.34        2.95996
         649725.76    4188533.34         3.68812                      650425.76
4188533.34      101.22201
         650525.76    4188533.34        54.95206                      650625.76
```

4188533.34 27.39596
650725.76 4188533.34 15.69927 650825.76
4188533.34 10.15879
651125.76 4188533.34 4.15423 649125.76
4188583.34 1.36809
649225.76 4188583.34 1.56682 649325.76
4188583.34 1.81620
649425.76 4188583.34 2.13584 649525.76
4188583.34 2.55618
649625.76 4188583.34 3.12670 649725.76
4188583.34 3.93264
650425.76 4188583.34 0.00000 650525.76
4188583.34 71.15977
650625.76 4188583.34 29.16568 650725.76
4188583.34 15.90140
650825.76 4188583.34 10.12761 651125.76
4188583.34 4.10144
649125.76 4188633.34 1.40210 649225.76
4188633.34 1.60898
649325.76 4188633.34 1.86954 649425.76
4188633.34 2.20502
649525.76 4188633.34 2.64861 649625.76
4188633.34 3.25483
649725.76 4188633.34 4.11874 649825.76
4188633.34 5.41966
649925.76 4188633.34 7.53260 650025.76
4188633.34 11.36622
650125.76 4188633.34 19.68301 650225.76
4188633.34 45.22354
650325.76 4188633.34 0.00000 650425.76
4188633.34 0.00000
650525.76 4188633.34 70.39500 650625.76
4188633.34 27.70538

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4 ***
INCLUDING SOURCE(S): VOL4 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650725.76	4188633.34	15.18468	650825.76	4188633.34	9.74237
651125.76	4188633.34	4.00094	649125.76	4188683.34	1.42486
649225.76	4188683.34	1.63555	649325.76	4188683.34	1.90083
649425.76	4188683.34	2.24224	649525.76	4188683.34	2.69337
649625.76	4188683.34	3.30932	649725.76	4188683.34	4.18607
649825.76	4188683.34	5.50429	649925.76	4188683.34	7.64032
650025.76	4188683.34	11.49670	650125.76	4188683.34	19.74279
650225.76	4188683.34	43.67173	650325.76	4188683.34	0.00000
650425.76	4188683.34	0.00000	650525.76	4188683.34	49.34341
650625.76	4188683.34	23.03667	650725.76	4188683.34	13.52563
650825.76	4188683.34	8.98400	651125.76	4188683.34	3.84918
649125.76	4188733.34	1.43087	649225.76	4188733.34	1.63948
649325.76	4188733.34	1.90100	649425.76	4188733.34	2.23590
649525.76	4188733.34	2.67592	649625.76	4188733.34	3.27286
649725.76	4188733.34	4.11604	649825.76	4188733.34	5.37069
649925.76	4188733.34	7.36967	650025.76	4188733.34	10.86026
650125.76	4188733.34	17.79858	650225.76	4188733.34	34.34872
650325.76	4188733.34	66.12417	650425.76	4188733.34	54.34743
650525.76	4188733.34	28.49711	650625.76	4188733.34	17.09461
650725.76	4188733.34	11.22699	650825.76	4188733.34	7.89884
651125.76	4188733.34	3.63265	649125.76	4188783.34	1.41678
649225.76	4188783.34	1.61783	649325.76	4188783.34	1.86870
649425.76	4188783.34	2.18853	649525.76		

4188783.34 2.60694
649625.76 4188783.34 3.17165 649725.76
4188783.34 3.96281
649825.76 4188783.34 5.12175 649925.76
4188783.34 6.91195
650025.76 4188783.34 9.86046 650125.76
4188783.34 15.17734
650225.76 4188783.34 24.93459 650325.76
4188783.34 31.70023
650425.76 4188783.34 24.68185 650525.76
4188783.34 17.16233
650625.76 4188783.34 12.14369 650725.76
4188783.34 8.89595
650825.76 4188783.34 6.68959 651125.76
4188783.34 3.35544
649125.76 4188833.34 1.38607 649225.76
4188833.34 1.57788
649325.76 4188833.34 1.81717 649425.76
4188833.34 2.12214
649525.76 4188833.34 2.52017 649625.76
4188833.34 3.05330
649725.76 4188833.34 3.78790 649825.76
4188833.34 4.83240
649925.76 4188833.34 6.37077 650025.76
4188833.34 8.75253
650125.76 4188833.34 12.68497 650225.76
4188833.34 17.74255
650325.76 4188833.34 18.14610 650425.76
4188833.34 14.86707
650525.76 4188833.34 11.55380 650625.76
4188833.34 8.84161
650725.76 4188833.34 6.95378 650825.76
4188833.34 5.55640
651125.76 4188833.34 3.04906 649125.76
4188883.34 1.34924

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4 ***
INCLUDING SOURCE(S): VOL4 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649225.76	4188883.34	1.53424	649325.76	4188883.34	1.76516
649425.76	4188883.34	2.05823	649525.76	4188883.34	2.43636
649625.76	4188883.34	2.93278	649725.76	4188883.34	3.59744
649825.76	4188883.34	4.50706	649925.76	4188883.34	5.78976
650025.76	4188883.34	7.71039	650125.76	4188883.34	10.49604
650225.76	4188883.34	12.67149	650325.76	4188883.34	11.77795
650425.76	4188883.34	10.12697	650525.76	4188883.34	8.40436
650625.76	4188883.34	6.75473	650725.76	4188883.34	5.50983
650825.76	4188883.34	4.58719	651125.76	4188883.34	2.74863
650125.76	4188933.34	8.57127	650225.76	4188933.34	9.25470
650325.76	4188933.34	8.32775	650425.76	4188933.34	7.41486
650525.76	4188933.34	6.42232	650625.76	4188933.34	5.36791
650725.76	4188933.34	4.48653	650825.76	4188933.34	3.81479
651125.76	4188933.34	2.46957	650425.76	4188983.34	5.70189
650525.76	4188983.34	5.08429	650625.76	4188983.34	4.38492
650725.76	4188983.34	3.74530	650825.76	4188983.34	3.22920
651125.76	4188983.34	2.21069	650525.76	4189033.34	4.13594
650625.76	4189033.34	3.65626	650725.76	4189033.34	3.18341
650825.76	4189033.34	2.78338	651125.76	4189033.34	1.97157
650525.76	4189083.34	3.43797	650625.76	4189083.34	3.09880
650725.76	4189083.34	2.74439	650825.76	4189083.34	2.43021
651125.76	4189083.34	1.75870	650525.76		

4189133.34 2.90857
650625.76 4189133.34 2.66216 650725.76
4189133.34 2.39417
650825.76 4189133.34 2.14178 651125.76
4189133.34 1.57810
650781.98 4189510.65 1.05019 650760.33
4189397.50 1.29773

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649676.34	4188314.55	4.28070	649629.66	4188294.84	3.71161
649810.15	4188312.48	5.82164	649364.10	4188360.20	2.50416
649327.80	4188355.01	2.33379	649380.70	4188758.52	3.54322
650495.81	4188841.51	5.73141	650597.47	4188832.17	4.79433
650536.27	4188878.85	4.56629	650577.76	4188877.81	4.26173
650602.66	4188860.18	4.32668	650610.95	4188880.93	3.98057
650638.10	4188858.53	4.06986	650664.10	4188331.03	5.73628
650668.72	4188350.83	5.80497	650677.96	4188379.86	5.83816
650699.74	4188414.84	5.66878	650758.47	4188658.36	4.71195
650765.73	4188678.82	4.53135	650773.65	4188706.54	4.29592
650778.27	4188726.34	4.12926	650805.33		

4188805.53 3.37467
650806.65 4188824.01 3.23931 650811.27
4188843.81 3.07996
650814.57 4188862.29 2.94293 650846.24
4188924.98 2.44890
650850.86 4188951.38 2.29968 650854.82
4188976.46 2.16699
650698.00 4188307.32 5.15181 650692.60
4188291.80 5.11272
650724.82 4189245.80 1.39442 650726.07
4189273.37 1.32430
650856.27 4189006.30 2.02557 650857.23
4189022.60 1.95114
650859.15 4189041.29 1.86741 650859.15
4189058.54 1.79671
650860.58 4189076.28 1.72495 650861.54
4189094.49 1.65607
650857.71 4189113.19 1.59632 650847.16
4189118.94 1.59177
650848.12 4189134.76 1.53894 650850.04
4189155.37 1.47399
650851.48 4189171.66 1.42637 650853.87
4189184.12 1.39037
650856.75 4189199.46 1.34844 650857.71
4189213.36 1.31435
650860.58 4189226.30 1.28193 650862.50
4189242.60 1.24494
650865.38 4189258.42 1.20986 650867.77
4189275.19 1.17520
650868.73 4189291.49 1.14439 650872.09
4189309.23 1.11027
650874.00 4189325.04 1.08210 650875.92
4189340.38 1.05571
650878.80 4189355.24 1.03023 650881.19
4189373.45 1.00097
650884.55 4189390.71 0.97351 650888.86
4189407.01 0.94779
650889.82 4189427.14 0.91980 650891.74
4189443.43 0.89725
650895.09 4189461.17 0.87285 650898.45
4189475.55 0.85343
650898.45 4189489.93 0.83616 650902.28
4189504.31 0.81767
650709.41 4188344.56 5.22369 650722.45
4188284.03 4.75112
650745.73 4188280.30 4.50699 650735.49
4188223.50 4.27643
650721.52 4188167.62 4.00885 650525.76
4188133.34 4.73990
651125.76 4188133.34 2.11985 649125.76

4188183.34 1.41688
649225.76 4188183.34 1.61563 649325.76
4188183.34 1.85484
649425.76 4188183.34 2.13517 649525.76
4188183.34 2.45884
649625.76 4188183.34 2.86211 649725.76
4188183.34 3.44248
649825.76 4188183.34 4.33614 649925.76
4188183.34 5.47089

↑ *** AERMOD - VERSION 19191 *** *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley *** 10/26/23
*** AERMET - VERSION 18081 *** *** *** 16:20:52

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC

- -

650025.76 4188183.34 6.08391 650125.76
4188183.34 6.29483
650225.76 4188183.34 6.81315 650325.76
4188183.34 6.65742
650425.76 4188183.34 6.04503 650525.76
4188183.34 5.44744
650625.76 4188183.34 4.76923 650725.76
4188183.34 4.08820
650825.76 4188183.34 3.47597 651125.76
4188183.34 2.17903
649125.76 4188233.34 1.49211 649225.76
4188233.34 1.70870
649325.76 4188233.34 1.97924 649425.76
4188233.34 2.31258
649525.76 4188233.34 2.71171 649625.76
4188233.34 3.19218
649725.76 4188233.34 3.85103 649825.76
4188233.34 4.89526
649925.76 4188233.34 6.40003 650025.76

4188233.34 7.41870
650125.76 4188233.34 7.78610 650225.76
4188233.34 8.41687
650325.76 4188233.34 8.00094 650425.76
4188233.34 7.15967
650525.76 4188233.34 6.26119 650625.76
4188233.34 5.29761
650725.76 4188233.34 4.41471 650825.76
4188233.34 3.67317
651125.76 4188233.34 2.23056 649125.76
4188283.34 1.57616
649225.76 4188283.34 1.81183 649325.76
4188283.34 2.11092
649425.76 4188283.34 2.49504 649525.76
4188283.34 2.98268
649625.76 4188283.34 3.58559 649725.76
4188283.34 4.36785
649825.76 4188283.34 5.59026 649925.76
4188283.34 7.57052
650025.76 4188283.34 9.26521 650125.76
4188283.34 9.93059
650225.76 4188283.34 10.66180 650325.76
4188283.34 9.81970
650425.76 4188283.34 8.55828 650525.76
4188283.34 7.16251
650625.76 4188283.34 5.82669 650725.76
4188283.34 4.71437
650825.76 4188283.34 3.84578 651125.76
4188283.34 2.27534
649125.76 4188333.34 1.66505 649225.76
4188333.34 1.92604
649325.76 4188333.34 2.25742 649425.76
4188333.34 2.69035
649525.76 4188333.34 3.26686 649625.76
4188333.34 4.02874
649725.76 4188333.34 5.02306 649825.76
4188333.34 6.49244
649925.76 4188333.34 9.07932 650025.76
4188333.34 11.92189
650125.76 4188333.34 13.19289 650225.76
4188333.34 13.93573
650325.76 4188333.34 12.34225 650425.76
4188333.34 10.24134
650525.76 4188333.34 8.10100 650625.76
4188333.34 6.31693
650725.76 4188333.34 4.97388 650825.76
4188333.34 3.99215
651125.76 4188333.34 2.31415 649125.76
4188383.34 1.75327
649225.76 4188383.34 2.04467 649325.76

4188383.34   2.41766
        649425.76   4188383.34   2.90801   649525.76
4188383.34   3.57512
        649625.76   4188383.34   4.50899   649725.76
4188383.34   5.81775
        649825.76   4188383.34   7.71025   649925.76
4188383.34   11.10088
        650025.76   4188383.34   15.94111   650125.76
4188383.34   18.54924
        650225.76   4188383.34   18.98036   650325.76
4188383.34   15.81286

*** AERMOD - VERSION 19191 ***   *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley ***   10/26/23
*** AERMET - VERSION 18081 ***   ***   ***   16:20:52

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5   ***
INCLUDING SOURCE(S):   VOL5   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650425.76	4188383.34	12.12608	650525.76	4188383.34	8.98970
650625.76	4188383.34	6.73648	650725.76	4188383.34	5.18851
650825.76	4188383.34	4.11226	651125.76	4188383.34	2.34573
649125.76	4188433.34	1.84104	649225.76	4188433.34	2.16261
649325.76	4188433.34	2.58199	649425.76	4188433.34	3.14290
649525.76	4188433.34	3.91857	649625.76	4188433.34	5.03933
649725.76	4188433.34	6.73024	649825.76	4188433.34	9.34625
649925.76	4188433.34	13.98607	650025.76	4188433.34	22.45781
650125.76	4188433.34	28.37667	650225.76		

4188433.34 27.23361
650325.76 4188433.34 20.29911 650425.76
4188433.34 13.99978
650525.76 4188433.34 9.74143 650625.76
4188433.34 7.06969
650725.76 4188433.34 5.35474 650825.76
4188433.34 4.20308
651125.76 4188433.34 2.36549 649125.76
4188483.34 1.93189
649225.76 4188483.34 2.28276 649325.76
4188483.34 2.74766
649425.76 4188483.34 3.38316 649525.76
4188483.34 4.28538
649625.76 4188483.34 5.63018 649725.76
4188483.34 7.76831
650425.76 4188483.34 15.57303 650525.76
4188483.34 10.29625
650625.76 4188483.34 7.29871 650725.76
4188483.34 5.45978
650825.76 4188483.34 4.25389 651125.76
4188483.34 2.36788
649125.76 4188533.34 2.02377 649225.76
4188533.34 2.40540
649325.76 4188533.34 2.91678 649425.76
4188533.34 3.62731
649525.76 4188533.34 4.66079 649625.76
4188533.34 6.25618
649725.76 4188533.34 8.92667 650425.76
4188533.34 16.57399
650525.76 4188533.34 10.58387 650625.76
4188533.34 7.38710
650725.76 4188533.34 5.48145 650825.76
4188533.34 4.25072
651125.76 4188533.34 2.35127 649125.76
4188583.34 2.10782
649225.76 4188583.34 2.51903 649325.76
4188583.34 3.07571
649425.76 4188583.34 3.85948 649525.76
4188583.34 5.02073
649625.76 4188583.34 6.86387 649725.76
4188583.34 10.09063
650425.76 4188583.34 16.73011 650525.76
4188583.34 10.52188
650625.76 4188583.34 7.30378 650725.76
4188583.34 5.40840
650825.76 4188583.34 4.19111 651125.76
4188583.34 2.31950
649125.76 4188633.34 2.17269 649225.76
4188633.34 2.60507
649325.76 4188633.34 3.19399 649425.76

4188633.34 4.02964
649525.76 4188633.34 5.28069 649625.76
4188633.34 7.29601
649725.76 4188633.34 10.90689 649825.76
4188633.34 18.57239
649925.76 4188633.34 40.97062 650025.76
4188633.34 0.00000
650125.76 4188633.34 0.00000 650225.76
4188633.34 78.16567
650325.76 4188633.34 29.42868 650425.76
4188633.34 15.85004
650525.76 4188633.34 10.07255 650625.76
4188633.34 7.04500

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M)
Y-COORD (M) CONC
- -
650725.76 4188633.34 5.24562 650825.76
4188633.34 4.08181
651125.76 4188633.34 2.27657 649125.76
4188683.34 2.20541
649225.76 4188683.34 2.64327 649325.76
4188683.34 3.23861
649425.76 4188683.34 4.08147 649525.76
4188683.34 5.33961
649625.76 4188683.34 7.35772 649725.76
4188683.34 10.94548
649825.76 4188683.34 18.41579 649925.76
4188683.34 38.89260
650025.76 4188683.34 124.25671 650125.76
4188683.34 0.00000
650225.76 4188683.34 51.13420 650325.76

4188683.34 23.83691
650425.76 4188683.34 13.93392 650525.76
4188683.34 9.21647
650625.76 4188683.34 6.59656 650725.76
4188683.34 4.98425
650825.76 4188683.34 3.91721 651125.76
4188683.34 2.22065
649125.76 4188733.34 2.19512 649225.76
4188733.34 2.62066
649325.76 4188733.34 3.19539 649425.76
4188733.34 4.00272
649525.76 4188733.34 5.19529 649625.76
4188733.34 7.07606
649725.76 4188733.34 10.30994 649825.76
4188733.34 16.57388
649925.76 4188733.34 30.92790 650025.76
4188733.34 58.25919
650125.76 4188733.34 50.67916 650225.76
4188733.34 28.18613
650325.76 4188733.34 17.22370 650425.76
4188733.34 11.39087
650525.76 4188733.34 8.02570 650625.76
4188733.34 5.95919
650725.76 4188733.34 4.61082 650825.76
4188733.34 3.68343
651125.76 4188733.34 2.14503 649125.76
4188783.34 2.14584
649225.76 4188783.34 2.55002 649325.76
4188783.34 3.09341
649425.76 4188783.34 3.85086 649525.76
4188783.34 4.95271
649625.76 4188783.34 6.63796 649725.76
4188783.34 9.37334
649825.76 4188783.34 14.20287 649925.76
4188783.34 22.99425
650025.76 4188783.34 29.69502 650125.76
4188783.34 23.75767
650225.76 4188783.34 16.89378 650325.76
4188783.34 12.06744
650425.76 4188783.34 8.91631 650525.76
4188783.34 6.73971
650625.76 4188783.34 5.22333 650725.76
4188783.34 4.15719
650825.76 4188783.34 3.38890 651125.76
4188783.34 2.04554
649125.76 4188833.34 2.08025 649225.76
4188833.34 2.46523
649325.76 4188833.34 2.97886 649425.76
4188833.34 3.68281
649525.76 4188833.34 4.67658 649625.76

4188833.34 6.12646
649725.76 4188833.34 8.34243 649825.76
4188833.34 11.96498
649925.76 4188833.34 16.73874 650025.76
4188833.34 17.45384
650125.76 4188833.34 14.45710 650225.76
4188833.34 11.41131
650325.76 4188833.34 8.77333 650425.76
4188833.34 6.92356
650525.76 4188833.34 5.56111 650625.76
4188833.34 4.50351
650725.76 4188833.34 3.68969 650825.76
4188833.34 3.06976
651125.76 4188833.34 1.92591 649125.76
4188883.34 2.01858

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC
- -
649225.76 4188883.34 2.38456 649325.76
4188883.34 2.86289
649425.76 4188883.34 3.49982 649525.76
4188883.34 4.36589
649625.76 4188883.34 5.57697 649725.76
4188883.34 7.37423
649825.76 4188883.34 9.99645 649925.76
4188883.34 12.16024
650025.76 4188883.34 11.46185 650125.76
4188883.34 9.89392
650225.76 4188883.34 8.30949 650325.76
4188883.34 6.71475
650425.76 4188883.34 5.48091 650525.76

4188883.34 4.57177
650625.76 4188883.34 3.85071 650725.76
4188883.34 3.25155
650825.76 4188883.34 2.76121 651125.76
4188883.34 1.79626
650125.76 4188933.34 7.26726 650225.76
4188933.34 6.35186
650325.76 4188933.34 5.34015 650425.76
4188933.34 4.46879
650525.76 4188933.34 3.79914 650625.76
4188933.34 3.28217
650725.76 4188933.34 2.85076 650825.76
4188933.34 2.47567
651125.76 4188933.34 1.66761 650425.76
4188983.34 3.73299
650525.76 4188983.34 3.21962 650625.76
4188983.34 2.81456
650725.76 4188983.34 2.49122 650825.76
4188983.34 2.21071
651125.76 4188983.34 1.54691 650525.76
4189033.34 2.77705
650625.76 4189033.34 2.44736 650725.76
4189033.34 2.18411
650825.76 4189033.34 1.96750 651125.76
4189033.34 1.43523
650525.76 4189083.34 2.42448 650625.76
4189083.34 2.15872
650725.76 4189083.34 1.93411 650825.76
4189083.34 1.75372
651125.76 4189083.34 1.32976 650525.76
4189133.34 2.13661
650625.76 4189133.34 1.92314 650725.76
4189133.34 1.73326
650825.76 4189133.34 1.57445 651125.76
4189133.34 1.22805
650781.98 4189510.65 0.86966 650760.33
4189397.50 1.04446

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS

***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649676.34	4188314.55	6.89338	649629.66	4188294.84	5.68851
649810.15	4188312.48	11.48115	649364.10	4188360.20	3.20366
649327.80	4188355.01	2.94998	649380.70	4188758.52	2.91132
650495.81	4188841.51	2.87581	650597.47	4188832.17	2.58895
650536.27	4188878.85	2.46551	650577.76	4188877.81	2.35324
650602.66	4188860.18	2.38920	650610.95	4188880.93	2.24569
650638.10	4188858.53	2.29986	650664.10	4188331.03	6.68207
650668.72	4188350.83	6.57945	650677.96	4188379.86	6.34565
650699.74	4188414.84	5.83949	650758.47	4188658.36	3.33666
650765.73	4188678.82	3.13679	650773.65	4188706.54	2.89650
650778.27	4188726.34	2.74145	650805.33	4188805.53	2.18279
650806.65	4188824.01	2.08429	650811.27	4188843.81	1.97811
650814.57	4188862.29	1.88758	650846.24	4188924.98	1.59457
650850.86	4188951.38	1.50434	650854.82	4188976.46	1.42749
650698.00	4188307.32	6.03034	650692.60	4188291.80	6.10348
650724.82	4189245.80	1.00305	650726.07	4189273.37	0.96189
650856.27	4189006.30	1.34911	650857.23	4189022.60	1.30963
650859.15	4189041.29	1.26613	650859.15	4189058.54	1.23014
650860.58	4189076.28	1.19358	650861.54	4189094.49	1.15838
650857.71	4189113.19	1.12818	650847.16	4189118.94	1.12730
650848.12	4189134.76	1.09875	650850.04		

4189155.37 1.06244
650851.48 4189171.66 1.03488 650853.87
4189184.12 1.01354
650856.75 4189199.46 0.98812 650857.71
4189213.36 0.96684
650860.58 4189226.30 0.94642 650862.50
4189242.60 0.92249
650865.38 4189258.42 0.89955 650867.77
4189275.19 0.87648
650868.73 4189291.49 0.85558 650872.09
4189309.23 0.83265
650874.00 4189325.04 0.81355 650875.92
4189340.38 0.79571
650878.80 4189355.24 0.77863 650881.19
4189373.45 0.75905
650884.55 4189390.71 0.74087 650888.86
4189407.01 0.72395
650889.82 4189427.14 0.70574 650891.74
4189443.43 0.69121
650895.09 4189461.17 0.67552 650898.45
4189475.55 0.66304
650898.45 4189489.93 0.65222 650902.28
4189504.31 0.64031
650709.41 4188344.56 5.83949 650722.45
4188284.03 5.60397
650745.73 4188280.30 5.26125 650735.49
4188223.50 5.27403
650721.52 4188167.62 5.24774 650525.76
4188133.34 8.16415
651125.76 4188133.34 2.33599 649125.76
4188183.34 1.73073
649225.76 4188183.34 2.01563 649325.76
4188183.34 2.37961
649425.76 4188183.34 2.85708 649525.76
4188183.34 3.50455
649625.76 4188183.34 4.40650 649725.76
4188183.34 5.66512
649825.76 4188183.34 7.47834 649925.76
4188183.34 10.67798

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650025.76	4188183.34	15.36820	650125.76	4188183.34	18.00971
650225.76	4188183.34	18.70917	650325.76	4188183.34	15.78353
650425.76	4188183.34	12.21678	650525.76	4188183.34	9.10532
650625.76	4188183.34	6.83277	650725.76	4188183.34	5.26039
650825.76	4188183.34	4.16512	651125.76	4188183.34	2.36887
649125.76	4188233.34	1.81702	649225.76	4188233.34	2.13139
649325.76	4188233.34	2.54026	649425.76	4188233.34	3.08549
649525.76	4188233.34	3.83697	649625.76	4188233.34	4.91784
649725.76	4188233.34	6.53762	649825.76	4188233.34	9.02815
649925.76	4188233.34	13.39201	650025.76	4188233.34	21.39980
650125.76	4188233.34	27.38489	650225.76	4188233.34	26.93510
650325.76	4188233.34	20.41296	650425.76	4188233.34	14.21540
650525.76	4188233.34	9.91612	650625.76	4188233.34	7.19067
650725.76	4188233.34	5.43781	650825.76	4188233.34	4.26165
651125.76	4188233.34	2.39014	649125.76	4188283.34	1.90610
649225.76	4188283.34	2.24908	649325.76	4188283.34	2.70231
649425.76	4188283.34	3.31967	649525.76	4188283.34	4.19233
649625.76	4188283.34	5.48615	649725.76	4188283.34	7.52835
649825.76	4188283.34	10.98893	649925.76	4188283.34	17.48323
650025.76	4188283.34	32.11248	650125.76		

4188283.34 47.87228
650225.76 4188283.34 40.97819 650325.76
4188283.34 25.79046
650425.76 4188283.34 15.94576 650525.76
4188283.34 10.52549
650625.76 4188283.34 7.44105 650725.76
4188283.34 5.55286
650825.76 4188283.34 4.31791 651125.76
4188283.34 2.39420
649125.76 4188333.34 1.99629 649225.76
4188333.34 2.36914
649325.76 4188333.34 2.86744 649425.76
4188333.34 3.55741
649525.76 4188333.34 4.55639 649625.76
4188333.34 6.08888
649725.76 4188333.34 8.63172 649825.76
4188333.34 13.34700
649925.76 4188333.34 23.64756 650025.76
4188333.34 55.25253
650125.76 4188333.34 108.73379 650225.76
4188333.34 63.13272
650325.76 4188333.34 30.65075 650425.76
4188333.34 17.09568
650525.76 4188333.34 10.85891 650625.76
4188333.34 7.54782
650725.76 4188333.34 5.58350 650825.76
4188333.34 4.31980
651125.76 4188333.34 2.37898 649125.76
4188383.34 2.07937
649225.76 4188383.34 2.48112 649325.76
4188383.34 3.02348
649425.76 4188383.34 3.78438 649525.76
4188383.34 4.90644
649625.76 4188383.34 6.67582 649725.76
4188383.34 9.74377
649825.76 4188383.34 15.89578 649925.76
4188383.34 31.80851
650025.76 4188383.34 108.48266 650125.76
4188383.34 0.00000
650225.76 4188383.34 86.87975 650325.76
4188383.34 33.04575

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION

VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650425.76	4188383.34	17.35866	650525.76	4188383.34	10.82872
650625.76	4188383.34	7.47713	650725.76	4188383.34	5.51647
650825.76	4188383.34	4.26340	651125.76	4188383.34	2.34783
649125.76	4188433.34	2.14443	649225.76	4188433.34	2.56742
649325.76	4188433.34	3.14204	649425.76	4188433.34	3.95468
649525.76	4188433.34	5.16594	649625.76	4188433.34	7.10537
649725.76	4188433.34	10.54934	649825.76	4188433.34	17.75455
649925.76	4188433.34	38.21987	650025.76	4188433.34	0.00000
650125.76	4188433.34	0.00000	650225.76	4188433.34	87.15591
650325.76	4188433.34	31.23660	650425.76	4188433.34	16.50889
650525.76	4188433.34	10.38768	650625.76	4188433.34	7.22136
650725.76	4188433.34	5.35494	650825.76	4188433.34	4.15460
651125.76	4188433.34	2.30484	649125.76	4188483.34	2.17901
649225.76	4188483.34	2.60853	649325.76	4188483.34	3.19136
649425.76	4188483.34	4.01441	649525.76	4188483.34	5.23894
649625.76	4188483.34	7.19426	649725.76	4188483.34	10.64818
650425.76	4188483.34	14.54004	650525.76	4188483.34	9.51711
650625.76	4188483.34	6.76778	650725.76	4188483.34	5.09137
650825.76	4188483.34	3.98890	651125.76		

4188483.34 2.24863
649125.76 4188533.34 2.17236 649225.76
4188533.34 2.59124
649325.76 4188533.34 3.15608 649425.76
4188533.34 3.94788
649525.76 4188533.34 5.11437 649625.76
4188533.34 6.94796
649725.76 4188533.34 10.08988 650425.76
4188533.34 11.88064
650525.76 4188533.34 8.29193 650625.76
4188533.34 6.11841
650725.76 4188533.34 4.71316 650825.76
4188533.34 3.75303
651125.76 4188533.34 2.17275 649125.76
4188583.34 2.12699
649225.76 4188583.34 2.52558 649325.76
4188583.34 3.06047
649425.76 4188583.34 3.80459 649525.76
4188583.34 4.88502
649625.76 4188583.34 6.53572 649725.76
4188583.34 9.21660
650425.76 4188583.34 9.26862 650525.76
4188583.34 6.95467
650625.76 4188583.34 5.36197 650725.76
4188583.34 4.25069
650825.76 4188583.34 3.45447 651125.76
4188583.34 2.07281
649125.76 4188633.34 2.06345 649225.76
4188633.34 2.44295
649325.76 4188633.34 2.94868 649425.76
4188633.34 3.64144
649525.76 4188633.34 4.61977 649625.76
4188633.34 6.04931
649725.76 4188633.34 8.23679 649825.76
4188633.34 11.81751
649925.76 4188633.34 16.80913 650025.76
4188633.34 18.27834
650125.76 4188633.34 15.18609 650225.76
4188633.34 11.94874
650325.76 4188633.34 9.13861 650425.76
4188633.34 7.16556
650525.76 4188633.34 5.72376 650625.76
4188633.34 4.61646

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
650725.76	4188633.34	3.77040	650825.76	4188633.34	3.12880
651125.76	4188633.34	1.95217	649125.76	4188683.34	2.00216
649225.76	4188683.34	2.36330	649325.76	4188683.34	2.83554
649425.76	4188683.34	3.46500	649525.76	4188683.34	4.32214
649625.76	4188683.34	5.52209	649725.76	4188683.34	7.29785
649825.76	4188683.34	9.92754	649925.76	4188683.34	12.34564
650025.76	4188683.34	11.93460	650125.76	4188683.34	10.26132
650225.76	4188683.34	8.61390	650325.76	4188683.34	6.94466
650425.76	4188683.34	5.64805	650525.76	4188683.34	4.69324
650625.76	4188683.34	3.93978	650725.76	4188683.34	3.31832
650825.76	4188683.34	2.81217	651125.76	4188683.34	1.82084
649125.76	4188733.34	1.94462	649225.76	4188733.34	2.28110
649325.76	4188733.34	2.71056	649425.76	4188733.34	3.26740
649525.76	4188733.34	4.00249	649625.76	4188733.34	5.01205
649725.76	4188733.34	6.47023	649825.76	4188733.34	8.24456
649925.76	4188733.34	9.17257	650025.76	4188733.34	8.43465
650125.76	4188733.34	7.48043	650225.76	4188733.34	6.54149
650325.76	4188733.34	5.49420	650425.76		

4188733.34 4.58713
650525.76 4188733.34 3.89050 650625.76
4188733.34 3.35239
650725.76 4188733.34 2.90519 650825.76
4188733.34 2.51856
651125.76 4188733.34 1.69001 649125.76
4188783.34 1.88135
649225.76 4188783.34 2.18775 649325.76
4188783.34 2.57138
649425.76 4188783.34 3.05762 649525.76
4188783.34 3.69008
649625.76 4188783.34 4.56083 649725.76
4188783.34 5.72146
649825.76 4188783.34 6.76985 649925.76
4188783.34 6.97989
650025.76 4188783.34 6.31507 650125.76
4188783.34 5.73756
650225.76 4188783.34 5.15620 650325.76
4188783.34 4.47013
650425.76 4188783.34 3.82000 650525.76
4188783.34 3.28900
650625.76 4188783.34 2.87033 650725.76
4188783.34 2.53578
650825.76 4188783.34 2.24662 651125.76
4188783.34 1.56694
649125.76 4188833.34 1.80900 649225.76
4188833.34 2.08551
649325.76 4188833.34 2.42581 649425.76
4188833.34 2.85110
649525.76 4188833.34 3.40888 649625.76
4188833.34 4.16263
649725.76 4188833.34 5.01123 649825.76
4188833.34 5.54154
649925.76 4188833.34 5.45957 650025.76
4188833.34 4.93334
650125.76 4188833.34 4.56540 650225.76
4188833.34 4.18145
650325.76 4188833.34 3.71448 650425.76
4188833.34 3.23973
650525.76 4188833.34 2.83070 650625.76
4188833.34 2.49189
650725.76 4188833.34 2.22081 650825.76
4188833.34 1.99771
651125.76 4188833.34 1.45294 649125.76
4188883.34 1.73153

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE PERIOD (43824 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
649225.76	4188883.34	1.98017	649325.76	4188883.34	2.28178
649425.76	4188883.34	2.66112	649525.76	4188883.34	3.16360
649625.76	4188883.34	3.78797	649725.76	4188883.34	4.34298
649825.76	4188883.34	4.56274	649925.76	4188883.34	4.38147
650025.76	4188883.34	3.98002	650125.76	4188883.34	3.73517
650225.76	4188883.34	3.46796	650325.76	4188883.34	3.13925
650425.76	4188883.34	2.78765	650525.76	4188883.34	2.46711
650625.76	4188883.34	2.19452	650725.76	4188883.34	1.96450
650825.76	4188883.34	1.77926	651125.76	4188883.34	1.34536
650125.76	4188933.34	3.12333	650225.76	4188933.34	2.92917
650325.76	4188933.34	2.69086	650425.76	4188933.34	2.42734
650525.76	4188933.34	2.17137	650625.76	4188933.34	1.95228
650725.76	4188933.34	1.75852	650825.76	4188933.34	1.59615
651125.76	4188933.34	1.24181	650425.76	4188983.34	2.13412
650525.76	4188983.34	1.92857	650625.76	4188983.34	1.74816
650725.76	4188983.34	1.58887	650825.76	4188983.34	1.44595
651125.76	4188983.34	1.14280	650525.76		

4189033.34 1.72712
650625.76 4189033.34 1.57429 650725.76
4189033.34 1.44361
650825.76 4189033.34 1.32139 651125.76
4189033.34 1.05105
650525.76 4189083.34 1.55712 650625.76
4189083.34 1.42667
650725.76 4189083.34 1.31605 650825.76
4189083.34 1.21460
651125.76 4189083.34 0.96919 650525.76
4189133.34 1.41128
650625.76 4189133.34 1.30125 650725.76
4189133.34 1.20377
650825.76 4189133.34 1.11976 651125.76
4189133.34 0.89822
650781.98 4189510.65 0.67971 650760.33
4189397.50 0.79281
↑ *** AERMOD - VERSION 19191 *** *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley *** 10/26/23
*** AERMET - VERSION 18081 *** ***
*** 16:20:52

PAGE 42
*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1 ***
INCLUDING SOURCE(S): VOL1 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -
649676.34 4188314.55 300.82721 (17022506) 649629.66
4188294.84 282.53141 (17013105)
649810.15 4188312.48 387.09247 (17013105) 649364.10
4188360.20 192.13475 (17121807)
649327.80 4188355.01 184.53852 (17121807) 649380.70
4188758.52 193.23152 (17011201)
650495.81 4188841.51 493.53965 (17121401) 650597.47
4188832.17 460.53760 (17021405)
650536.27 4188878.85 455.76087 (17022508) 650577.76
4188877.81 406.02556 (17022508)
650602.66 4188860.18 412.48817 (17021405) 650610.95

4188880.93 387.98235 (17121904)
650638.10 4188858.53 420.02917 (17021405) 650664.10
4188331.03 638.40262 (17121906)
650668.72 4188350.83 611.61482 (17020824) 650677.96
4188379.86 611.54430 (17121319)
650699.74 4188414.84 593.79216 (17122621) 650758.47
4188658.36 438.58091 (14012706)
650765.73 4188678.82 446.06833 (17121119) 650773.65
4188706.54 431.66872 (17121119)
650778.27 4188726.34 409.75574 (17123020) 650805.33
4188805.53 357.84474 (17022407)
650806.65 4188824.01 348.41558 (17022407) 650811.27
4188843.81 326.52615 (17022407)
650814.57 4188862.29 305.49873 (14011617) 650846.24
4188924.98 272.74811 (17122321)
650850.86 4188951.38 274.86556 (17122321) 650854.82
4188976.46 267.52333 (17122321)
650698.00 4188307.32 564.37914 (17122619) 650692.60
4188291.80 664.54185 (17011509)
650724.82 4189245.80 196.07922 (17022508) 650726.07
4189273.37 194.38232 (17022508)
650856.27 4189006.30 247.30401 (17122321) 650857.23
4189022.60 244.93049 (17012601)
650859.15 4189041.29 244.63305 (17012601) 650859.15
4189058.54 241.33866 (17012601)
650860.58 4189076.28 233.90915 (17012601) 650861.54
4189094.49 223.20484 (17012601)
650857.71 4189113.19 218.00401 (17022706) 650847.16
4189118.94 219.08470 (17022706)
650848.12 4189134.76 212.78194 (17022706) 650850.04
4189155.37 203.17912 (17022324)
650851.48 4189171.66 199.06804 (17021405) 650853.87
4189184.12 198.82595 (17021405)
650856.75 4189199.46 197.84061 (17021405) 650857.71
4189213.36 197.00707 (17021405)
650860.58 4189226.30 194.73596 (17021405) 650862.50
4189242.60 191.68293 (17021405)
650865.38 4189258.42 187.77121 (17021405) 650867.77
4189275.19 183.01242 (17021405)
650868.73 4189291.49 177.54016 (17021405) 650872.09
4189309.23 171.32848 (17021405)
650874.00 4189325.04 165.14391 (17021405) 650875.92
4189340.38 158.84087 (17021405)
650878.80 4189355.24 156.70873 (17121904) 650881.19
4189373.45 154.66400 (17121904)
650884.55 4189390.71 151.94610 (17121904) 650888.86
4189407.01 148.98435 (17121904)
650889.82 4189427.14 144.87428 (17121904) 650891.74
4189443.43 141.02292 (17121904)
650895.09 4189461.17 136.71269 (17121904) 650898.45

4189475.55   133.25027 (17121904)
       650898.45   4189489.93   128.65099 (17121904)   650902.28
4189504.31   125.16821 (17121904)
       650709.41   4188344.56   529.16594 (17011303)   650722.45
4188284.03   561.29699 (17011509)
       650745.73   4188280.30   482.28966 (17122619)   650735.49
4188223.50   625.42529 (17011509)
       650721.52   4188167.62   521.02672 (17122320)   650525.76
4188133.34   713.84000 (17012903)
       651125.76   4188133.34   204.61118 (17122619)   649125.76
4188183.34   148.16772 (17013105)
       649225.76   4188183.34   162.41781 (17013105)   649325.76
4188183.34   181.67095 (17012823)
       649425.76   4188183.34   204.57146 (17121207)   649525.76
4188183.34   234.86789 (17123023)
       649625.76   4188183.34   277.55213 (17021308)   649725.76
4188183.34   314.45476 (17021308)
       649825.76   4188183.34   365.65447 (17021420)   649925.76
4188183.34   441.94583 (17120517)

*** AERMOD - VERSION 19191 ***   *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley ***   10/26/23
*** AERMET - VERSION 18081 ***   ***   ***   16:20:52

PAGE 43
*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1   ***
INCLUDING SOURCE(S):   VOL1   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

     X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M)
Y-COORD (M)   CONC   (YYMMDDHH)
- -
       650025.76   4188183.34   510.05168 (13010908)   650125.76
4188183.34   628.51099 (17121108)
       650225.76   4188183.34   750.37832 (13020205)   650325.76
4188183.34   931.35324 (17011609)
       650425.76   4188183.34   954.50142 (17122917)   650525.76
4188183.34   816.52159 (17020801)
       650625.76   4188183.34   641.74705 (17012908)   650725.76
4188183.34   524.40476 (17121219)
       650825.76   4188183.34   494.38526 (17011509)   651125.76

4188183.34 207.96425 (17020824)
649125.76 4188233.34 149.18434 (17022506) 649225.76
4188233.34 160.29286 (17022506)
649325.76 4188233.34 184.37966 (17013105) 649425.76
4188233.34 209.06380 (17013105)
649525.76 4188233.34 236.77844 (17012823) 649625.76
4188233.34 271.87353 (17121207)
649725.76 4188233.34 319.61341 (17123023) 649825.76
4188233.34 399.09039 (17021308)
649925.76 4188233.34 465.71080 (17021420) 650025.76
4188233.34 570.89039 (17120517)
650125.76 4188233.34 693.32932 (13022803) 650225.76
4188233.34 874.86001 (15010507)
650325.76 4188233.34 1055.32605 (17011609) 650425.76
4188233.34 1112.51898 (17122917)
650525.76 4188233.34 900.04165 (17120120) 650625.76
4188233.34 705.19482 (17122320)
650725.76 4188233.34 651.11014 (17011509) 650825.76
4188233.34 396.31394 (17011509)
651125.76 4188233.34 208.45085 (17011303) 649125.76
4188283.34 146.96741 (17122902)
649225.76 4188283.34 164.49567 (17022506) 649325.76
4188283.34 188.29521 (17022506)
649425.76 4188283.34 212.04362 (17022506) 649525.76
4188283.34 236.37159 (17013105)
649625.76 4188283.34 281.85893 (17013105) 649725.76
4188283.34 327.57136 (17012823)
649825.76 4188283.34 394.16848 (17123023) 649925.76
4188283.34 510.77673 (17021308)
650025.76 4188283.34 618.11023 (17021420) 650125.76
4188283.34 764.12132 (17120517)
650225.76 4188283.34 1044.41850 (16010309) 650325.76
4188283.34 1280.40167 (14021105)
650425.76 4188283.34 1375.89955 (17122701) 650525.76
4188283.34 1047.27406 (17012908)
650625.76 4188283.34 889.25868 (17011509) 650725.76
4188283.34 549.79005 (17011509)
650825.76 4188283.34 385.65808 (17020824) 651125.76
4188283.34 214.14290 (17121319)
649125.76 4188333.34 147.90522 (17121807) 649225.76
4188333.34 166.91986 (17121807)
649325.76 4188333.34 188.23997 (17121807) 649425.76
4188333.34 211.65658 (17121807)
649525.76 4188333.34 238.43943 (17122902) 649625.76
4188333.34 285.54547 (17022506)
649725.76 4188333.34 337.58221 (17022506) 649825.76
4188333.34 406.15016 (17013105)
649925.76 4188333.34 497.78562 (17012823) 650025.76
4188333.34 652.99368 (17021308)
650125.76 4188333.34 869.67075 (17021420) 650225.76

4188333.34 1174.91056 (15011205)
650325.76 4188333.34 1677.22291 (13011517) 650425.76
4188333.34 1780.31263 (17122318)
650525.76 4188333.34 1272.28812 (17011509) 650625.76
4188333.34 823.06587 (17011509)
650725.76 4188333.34 502.25335 (17020824) 650825.76
4188333.34 390.95657 (17121319)
651125.76 4188333.34 228.07187 (17122519) 649125.76
4188383.34 150.52670 (17013008)
649225.76 4188383.34 167.58325 (17013008) 649325.76
4188383.34 187.56833 (17013008)
649425.76 4188383.34 211.10123 (17013008) 649525.76
4188383.34 238.92657 (17013008)
649625.76 4188383.34 279.33421 (17121807) 649725.76
4188383.34 338.35754 (17121807)
649825.76 4188383.34 411.98968 (17121807) 649925.76
4188383.34 511.90888 (17022506)
650025.76 4188383.34 671.02359 (17022506) 650125.76
4188383.34 913.52468 (17011605)
650225.76 4188383.34 1431.31757 (17021308) 650325.76
4188383.34 2312.52925 (16010309)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1 ***
INCLUDING SOURCE(S): VOL1 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -
650425.76 4188383.34 0.00000 (00000000) 650525.76
4188383.34 1391.45986 (17011509)
650625.76 4188383.34 733.97423 (17121319) 650725.76
4188383.34 543.53320 (17122519)
650825.76 4188383.34 423.75585 (17122519) 651125.76
4188383.34 219.18244 (17122719)
649125.76 4188433.34 154.95669 (17011505) 649225.76

4188433.34 172.36774 (17011505)
649325.76 4188433.34 193.34411 (17011505) 649425.76
4188433.34 219.04291 (17011505)
649525.76 4188433.34 251.11041 (17011505) 649625.76
4188433.34 291.99731 (17011505)
649725.76 4188433.34 345.52973 (17011505) 649825.76
4188433.34 417.97855 (17011505)
649925.76 4188433.34 520.28545 (17011505) 650025.76
4188433.34 673.19275 (17011505)
650125.76 4188433.34 920.76118 (17011505) 650225.76
4188433.34 1434.71397 (17121420)
650325.76 4188433.34 0.00000 (00000000) 650425.76
4188433.34 0.00000 (00000000)
650525.76 4188433.34 1304.53810 (17122621) 650625.76
4188433.34 805.61867 (17122621)
650725.76 4188433.34 557.93468 (17122621) 650825.76
4188433.34 413.91332 (17122621)
651125.76 4188433.34 219.09953 (16010203) 649125.76
4188483.34 151.73379 (17120922)
649225.76 4188483.34 169.21309 (17013107) 649325.76
4188483.34 191.66682 (17013107)
649425.76 4188483.34 219.00207 (17013107) 649525.76
4188483.34 252.71425 (17013107)
649625.76 4188483.34 294.90757 (17013107) 649725.76
4188483.34 348.59553 (17013107)
650425.76 4188483.34 0.00000 (00000000) 650525.76
4188483.34 1282.94034 (13032807)
650625.76 4188483.34 799.97901 (14021120) 650725.76
4188483.34 567.51841 (14022208)
650825.76 4188483.34 442.88312 (14022208) 651125.76
4188483.34 245.17545 (14022208)
649125.76 4188533.34 151.68918 (17013107) 649225.76
4188533.34 170.17400 (17122903)
649325.76 4188533.34 192.29284 (17122903) 649425.76
4188533.34 217.51350 (17122903)
649525.76 4188533.34 247.55237 (17011121) 649625.76
4188533.34 292.78258 (17121322)
649725.76 4188533.34 344.97393 (17121322) 650425.76
4188533.34 1930.61376 (17022508)
650525.76 4188533.34 1195.17638 (17121119) 650625.76
4188533.34 786.40627 (14011317)
650725.76 4188533.34 547.90479 (15122617) 650825.76
4188533.34 418.64795 (14010519)
651125.76 4188533.34 229.30807 (14021603) 649125.76
4188583.34 152.53732 (17121322)
649225.76 4188583.34 171.37886 (17121322) 649325.76
4188583.34 191.41409 (17121322)
649425.76 4188583.34 211.66980 (17121322) 649525.76
4188583.34 240.79316 (17120702)
649625.76 4188583.34 269.83070 (17120702) 649725.76

4188583.34   309.98274 (17122608)
       650425.76   4188583.34   1471.93756 (17022508)   650525.76
4188583.34   1010.28364 (17022407)
       650625.76   4188583.34   713.82929 (17121119)   650725.76
4188583.34   535.98151 (14011317)
       650825.76   4188583.34   409.53003 (15010317)   651125.76
4188583.34   225.18378 (14010519)
       649125.76   4188633.34   148.24880 (17120702)   649225.76
4188633.34   165.00306 (17120702)
       649325.76   4188633.34   179.47739 (17120702)   649425.76
4188633.34   189.48087 (17013104)
       649525.76   4188633.34   224.78284 (17122608)   649625.76
4188633.34   269.91944 (17122608)
       649725.76   4188633.34   317.09215 (17011201)   649825.76
4188633.34   394.87186 (17011201)
       649925.76   4188633.34   486.84223 (17121007)   650025.76
4188633.34   559.48999 (17121402)
       650125.76   4188633.34   600.39670 (17120208)   650225.76
4188633.34   834.48202 (17122909)
       650325.76   4188633.34   1055.71440 (17012717)   650425.76
4188633.34   1062.25976 (17121401)
       650525.76   4188633.34   891.65214 (17012601)   650625.76
4188633.34   643.34655 (17123020)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1   ***
INCLUDING SOURCE(S):   VOL1   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

     X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M)
Y-COORD (M)   CONC   (YYMMDDHH)
- -
       650725.76   4188633.34   495.19551 (13121617)   650825.76
4188633.34   391.80730 (13020908)
       651125.76   4188633.34   223.12580 (15122617)   649125.76
4188683.34   136.42657 (17013104)
       649225.76   4188683.34   143.56052 (17122608)   649325.76

4188683.34 172.72282 (17122608)
649425.76 4188683.34 200.35477 (17122608) 649525.76
4188683.34 223.09590 (17123105)
649625.76 4188683.34 275.90884 (17011201) 649725.76
4188683.34 319.64340 (17120707)
649825.76 4188683.34 384.97063 (17020404) 649925.76
4188683.34 423.78249 (17121402)
650025.76 4188683.34 432.23852 (17120624) 650125.76
4188683.34 531.86563 (17123024)
650225.76 4188683.34 678.32637 (17122724) 650325.76
4188683.34 878.32017 (17012717)
650425.76 4188683.34 864.73434 (17012905) 650525.76
4188683.34 772.44093 (17021405)
650625.76 4188683.34 586.11176 (14011617) 650725.76
4188683.34 485.79915 (17121119)
650825.76 4188683.34 371.56808 (13121617) 651125.76
4188683.34 218.13931 (15010317)
649125.76 4188733.34 138.17684 (17122608) 649225.76
4188733.34 156.49812 (17122608)
649325.76 4188733.34 172.95052 (17123105) 649425.76
4188733.34 202.05784 (17011201)
649525.76 4188733.34 233.34572 (17011201) 649625.76
4188733.34 267.65696 (17121007)
649725.76 4188733.34 315.87878 (17020404) 649825.76
4188733.34 335.65799 (17121402)
649925.76 4188733.34 340.44132 (17043004) 650025.76
4188733.34 391.48687 (17123024)
650125.76 4188733.34 511.72932 (17122909) 650225.76
4188733.34 607.51104 (17022607)
650325.76 4188733.34 721.04394 (17012717) 650425.76
4188733.34 704.29866 (17012905)
650525.76 4188733.34 616.52601 (17122223) 650625.76
4188733.34 544.40807 (17122321)
650725.76 4188733.34 454.36986 (17022407) 650825.76
4188733.34 378.38653 (17121119)
651125.76 4188733.34 213.29550 (14011317) 649125.76
4188783.34 139.07254 (17123105)
649225.76 4188783.34 153.71253 (17011201) 649325.76
4188783.34 180.84652 (17011201)
649425.76 4188783.34 201.35364 (17120707) 649525.76
4188783.34 231.48618 (17121007)
649625.76 4188783.34 264.34076 (17020404) 649725.76
4188783.34 274.61608 (17121402)
649825.76 4188783.34 287.72322 (17043004) 649925.76
4188783.34 304.25923 (17120208)
650025.76 4188783.34 349.82147 (17010902) 650125.76
4188783.34 422.05988 (16022108)
650225.76 4188783.34 542.71763 (17120219) 650325.76
4188783.34 588.49022 (17012717)
650425.76 4188783.34 572.38198 (17012905) 650525.76

4188783.34 579.44724 (17022508)
650625.76 4188783.34 491.15918 (17022706) 650725.76
4188783.34 393.51673 (14011617)
650825.76 4188783.34 331.58084 (17123020) 651125.76
4188783.34 203.57031 (14022307)
649125.76 4188833.34 143.04851 (17011201) 649225.76
4188833.34 158.73591 (17011201)
649325.76 4188833.34 177.06678 (17120707) 649425.76
4188833.34 200.76165 (17121007)
649525.76 4188833.34 224.86794 (17020404) 649625.76
4188833.34 230.20370 (17121402)
649725.76 4188833.34 245.66599 (17043004) 649825.76
4188833.34 243.26425 (17121808)
649925.76 4188833.34 289.82951 (17123024) 650025.76
4188833.34 348.88694 (17122909)
650125.76 4188833.34 389.29150 (17122724) 650225.76
4188833.34 477.47970 (17120219)
650325.76 4188833.34 504.94576 (17120618) 650425.76
4188833.34 466.11557 (17012720)
650525.76 4188833.34 520.09971 (17022508) 650625.76
4188833.34 446.75383 (17021405)
650725.76 4188833.34 388.96925 (17122321) 650825.76
4188833.34 335.66221 (17022407)
651125.76 4188833.34 197.89748 (17120617) 649125.76
4188883.34 149.10119 (16012009)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL1 ***
INCLUDING SOURCE(S): VOL1 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -
649225.76 4188883.34 156.98288 (17122805) 649325.76
4188883.34 174.85240 (17121007)
649425.76 4188883.34 193.90013 (17020404) 649525.76

4188883.34   197.19523 (17120905)
       649625.76   4188883.34   211.89393 (17043004)   649725.76
4188883.34   206.63710 (17120624)
       649825.76   4188883.34   224.46875 (15022507)   649925.76
4188883.34   258.82066 (17123021)
       650025.76   4188883.34   314.57549 (17020506)   650125.76
4188883.34   345.53773 (17022607)
       650225.76   4188883.34   385.54659 (17120219)   650325.76
4188883.34   449.85698 (17120618)
       650425.76   4188883.34   419.81525 (17012720)   650525.76
4188883.34   438.27319 (17022508)
       650625.76   4188883.34   397.86171 (17021405)   650725.76
4188883.34   360.51278 (17012601)
       650825.76   4188883.34   287.81159 (17022408)   651125.76
4188883.34   189.82709 (14012706)
       650125.76   4188933.34   342.23783 (17022607)   650225.76
4188933.34   334.70951 (15021408)
       650325.76   4188933.34   401.30140 (17120618)   650425.76
4188933.34   380.19045 (17012720)
       650525.76   4188933.34   385.75391 (17121401)   650625.76
4188933.34   338.75371 (17121904)
       650725.76   4188933.34   324.15204 (17022706)   650825.76
4188933.34   292.73319 (17122321)
       651125.76   4188933.34   200.27082 (17121119)   650425.76
4188983.34   346.02052 (17012720)
       650525.76   4188983.34   345.13266 (17121401)   650625.76
4188983.34   309.40506 (17122223)
       650725.76   4188983.34   296.98929 (17021405)   650825.76
4188983.34   266.62966 (17012601)
       651125.76   4188983.34   189.12487 (17123020)   650525.76
4189033.34   305.27871 (17120207)
       650625.76   4189033.34   302.99989 (17022508)   650725.76
4189033.34   282.33199 (17021405)
       650825.76   4189033.34   255.16529 (17012601)   651125.76
4189033.34   167.40655 (17120122)
       650525.76   4189083.34   288.07368 (17120207)   650625.76
4189083.34   284.76916 (17022508)
       650725.76   4189083.34   246.27417 (17121904)   650825.76
4189083.34   234.14715 (17022706)
       651125.76   4189083.34   179.17600 (17022407)   650525.76
4189133.34   266.63323 (17120207)
       650625.76   4189133.34   256.88331 (17022508)   650725.76
4189133.34   223.40255 (17121904)
       650825.76   4189133.34   214.42543 (17021405)   651125.76
4189133.34   163.32503 (17022407)
       650781.98   4189510.65   146.98196 (17022508)   650760.33
4189397.50   167.75798 (17022508)

*** 16:20:52

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2 ***

INCLUDING SOURCE(S): VOL2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
649676.34	4188314.55	1447.78836	(16010309)	649629.66	4188294.84	1089.64678	(13123102)
649810.15	4188312.48	1763.74881	(17011203)	649364.10	4188360.20	563.94007	(17022506)
649327.80	4188355.01	515.25496	(17022506)	649380.70	4188758.52	335.26133	(17123024)
650495.81	4188841.51	202.83175	(14012706)	650597.47	4188832.17	175.52506	(13121319)
650536.27	4188878.85	191.83181	(17121119)	650577.76	4188877.81	177.29636	(14012706)
650602.66	4188860.18	175.57496	(17120617)	650610.95	4188880.93	170.43754	(17120617)
650638.10	4188858.53	164.19963	(17120617)	650664.10	4188331.03	181.23179	(17122719)
650668.72	4188350.83	178.17047	(17122719)	650677.96	4188379.86	177.78458	(17122621)
650699.74	4188414.84	167.55026	(16010203)	650758.47	4188658.36	158.33219	(15122617)
650765.73	4188678.82	157.11573	(15122617)	650773.65	4188706.54	153.29160	(13020204)
650778.27	4188726.34	153.14300	(15010317)	650805.33	4188805.53	141.61892	(14011317)
650806.65	4188824.01	141.41401	(14011317)	650811.27	4188843.81	138.18920	(14022106)
650814.57	4188862.29	136.99313	(13020908)	650846.24	4188924.98	128.74603	(14022307)
650850.86	4188951.38	123.81103	(13121319)	650854.82	4188976.46	123.12738	(17120617)
650698.00	4188307.32	176.94720	(17122519)	650692.60	4188291.80	177.39896	(17122519)
650724.82	4189245.80	132.09814	(17022407)	650726.07			

4189273.37   127.38498 (17022407)
650856.27   4189006.30   122.77619 (17120617)   650857.23
4189022.60   119.76841 (17120617)
650859.15   4189041.29   119.31948 (14012706)   650859.15
4189058.54   118.18024 (14012706)
650860.58   4189076.28   120.42073 (13103008)   650861.54
4189094.49   123.09969 (17121119)
650857.71   4189113.19   125.71053 (17121119)   650847.16
4189118.94   127.04820 (17121119)
650848.12   4189134.76   125.02814 (17121119)   650850.04
4189155.37   122.52592 (17123020)
650851.48   4189171.66   122.60968 (17123020)   650853.87
4189184.12   121.43298 (17123020)
650856.75   4189199.46   118.88941 (17123020)   650857.71
4189213.36   115.52393 (17123020)
650860.58   4189226.30   111.72573 (17123020)   650862.50
4189242.60   105.87305 (17123020)
650865.38   4189258.42   101.93080 (13121217)   650867.77
4189275.19   101.29099 (13121217)
650868.73   4189291.49   102.76114 (17120122)   650872.09
4189309.23   105.62510 (13121109)
650874.00   4189325.04   108.34091 (13121109)   650875.92
4189340.38   110.19959 (13121109)
650878.80   4189355.24   111.14339 (13121109)   650881.19
4189373.45   111.52920 (13121109)
650884.55   4189390.71   110.91645 (13121109)   650888.86
4189407.01   109.64990 (13121109)
650889.82   4189427.14   107.00137 (13121109)   650891.74
4189443.43   104.12412 (13121109)
650895.09   4189461.17   100.52633 (13121109)   650898.45
4189475.55   97.35954 (13121109)
650898.45   4189489.93   93.21084 (13121109)   650902.28
4189504.31   92.04787 (17120205)
650709.41   4188344.56   168.94120 (17122719)   650722.45
4188284.03   169.39152 (17122519)
650745.73   4188280.30   164.08732 (17122519)   650735.49
4188223.50   157.09470 (17121319)
650721.52   4188167.62   156.03188 (17011303)   650525.76
4188133.34   205.72809 (17121906)
651125.76   4188133.34   100.86347 (17121319)   649125.76
4188183.34   327.77246 (17021308)
649225.76   4188183.34   374.50009 (17021420)   649325.76
4188183.34   449.32068 (17121504)
649425.76   4188183.34   516.07621 (13012121)   649525.76
4188183.34   651.10657 (13013108)
649625.76   4188183.34   786.61607 (13020205)   649725.76
4188183.34   938.68683 (17011609)
649825.76   4188183.34   1014.39376 (17122917)   649925.76
4188183.34   863.20920 (17020801)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2 ***
INCLUDING SOURCE(S): VOL2 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
650025.76	4188183.34	647.34224	(17012908)	650125.76	4188183.34	546.20525	(17121219)
650225.76	4188183.34	491.34861	(17011509)	650325.76	4188183.34	305.33989	(17122619)
650425.76	4188183.34	246.09949	(17020824)	650525.76	4188183.34	203.61189	(17020824)
650625.76	4188183.34	178.55259	(17011303)	650725.76	4188183.34	152.15469	(17121319)
650825.76	4188183.34	140.64480	(17121319)	651125.76	4188183.34	99.97931	(17010504)
649125.76	4188233.34	322.90649	(17123023)	649225.76	4188233.34	401.76774	(17021308)
649325.76	4188233.34	471.51638	(17120203)	649425.76	4188233.34	585.33407	(17121504)
649525.76	4188233.34	708.54256	(13010908)	649625.76	4188233.34	907.55575	(16010309)
649725.76	4188233.34	1093.28737	(13012120)	649825.76	4188233.34	1196.10870	(17122917)
649925.76	4188233.34	948.52183	(17120120)	650025.76	4188233.34	747.47980	(17122320)
650125.76	4188233.34	665.13778	(17011509)	650225.76	4188233.34	390.50465	(17122619)
650325.76	4188233.34	307.37952	(17020824)	650425.76	4188233.34	246.23931	(17011303)
650525.76	4188233.34	206.46937	(17011303)	650625.76	4188233.34	184.91442	(17121319)
650725.76	4188233.34	157.33689	(17010504)	650825.76	4188233.34	139.77642	(17010504)
651125.76	4188233.34	107.28473	(17122519)	649125.76			

4188283.34 330.99614 (17013105)
649225.76 4188283.34 392.72551 (17121207) 649325.76
4188283.34 488.31013 (17021308)
649425.76 4188283.34 633.94499 (17021308) 649525.76
4188283.34 805.81905 (17121504)
649625.76 4188283.34 1060.90431 (13013108) 649725.76
4188283.34 1381.56776 (14012608)
649825.76 4188283.34 1486.08404 (17122701) 649925.76
4188283.34 1092.02611 (17012908)
650025.76 4188283.34 949.08342 (17011509) 650125.76
4188283.34 521.26219 (17122619)
650225.76 4188283.34 383.02100 (17020824) 650325.76
4188283.34 304.96714 (17011303)
650425.76 4188283.34 258.69436 (17121319) 650525.76
4188283.34 214.75852 (17010504)
650625.76 4188283.34 186.64484 (17122519) 650725.76
4188283.34 168.57538 (17122519)
650825.76 4188283.34 149.85302 (17122519) 651125.76
4188283.34 105.14587 (17122719)
649125.76 4188333.34 336.19419 (17022506) 649225.76
4188333.34 407.14855 (17022506)
649325.76 4188333.34 505.25281 (17013105) 649425.76
4188333.34 638.60536 (17121823)
649525.76 4188333.34 923.82743 (17021308) 649625.76
4188333.34 1208.55392 (17121504)
649725.76 4188333.34 1783.35496 (14021408) 649825.76
4188333.34 1942.39047 (17122318)
649925.76 4188333.34 1459.51143 (17011509) 650025.76
4188333.34 755.87023 (17121906)
650125.76 4188333.34 514.27279 (17011303) 650225.76
4188333.34 399.33989 (17121319)
650325.76 4188333.34 322.99610 (17122519) 650425.76
4188333.34 274.57774 (17122519)
650525.76 4188333.34 229.65828 (17122519) 650625.76
4188333.34 191.37136 (17122719)
650725.76 4188333.34 166.63982 (17122719) 650825.76
4188333.34 145.13365 (17122719)
651125.76 4188333.34 101.97730 (17122621) 649125.76
4188383.34 330.40847 (17013008)
649225.76 4188383.34 402.29020 (17121807) 649325.76
4188383.34 511.78653 (17121807)
649425.76 4188383.34 658.37755 (17121807) 649525.76
4188383.34 916.84969 (17022506)
649625.76 4188383.34 1403.35370 (17021308) 649725.76
4188383.34 0.00000 (00000000)
649825.76 4188383.34 0.00000 (00000000) 649925.76
4188383.34 1235.39049 (17121906)
650025.76 4188383.34 781.12621 (17122519) 650125.76
4188383.34 567.53804 (17122519)
650225.76 4188383.34 416.13648 (17122719) 650325.76

4188383.34   324.79505 (17122719)
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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2   ***
INCLUDING SOURCE(S):   VOL2   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
650425.76	4188383.34	267.46792	(17122621)	650525.76	4188383.34	225.03840	(17122621)
650625.76	4188383.34	192.14116	(17122621)	650725.76	4188383.34	166.14773	(17122621)
650825.76	4188383.34	145.24640	(17122621)	651125.76	4188383.34	102.22186	(17122621)
649125.76	4188433.34	346.99262	(17011505)	649225.76	4188433.34	420.19001	(17011505)
649325.76	4188433.34	523.76584	(17011505)	649425.76	4188433.34	678.93970	(17011505)
649525.76	4188433.34	934.24643	(17121203)	649625.76	4188433.34	1427.19434	(17121203)
649725.76	4188433.34	0.00000	(00000000)	649825.76	4188433.34	0.00000	(00000000)
649925.76	4188433.34	1424.57478	(14022208)	650025.76	4188433.34	870.97686	(14022208)
650125.76	4188433.34	599.66632	(14022208)	650225.76	4188433.34	443.32930	(14022208)
650325.76	4188433.34	343.88473	(14022208)	650425.76	4188433.34	276.21206	(14022208)
650525.76	4188433.34	228.93838	(16010203)	650625.76	4188433.34	194.92121	(16010203)
650725.76	4188433.34	168.62683	(16010203)	650825.76	4188433.34	147.78269	(16010203)
651125.76	4188433.34	105.52911	(16010203)	649125.76	4188483.34	342.26364	(17122903)
649225.76	4188483.34	414.82598	(17011121)	649325.76			

4188483.34 524.96133 (17121322)
649425.76 4188483.34 668.16461 (17121322) 649525.76
4188483.34 896.27635 (17122608)
649625.76 4188483.34 1374.26314 (17011201) 649725.76
4188483.34 2142.77393 (17122909)
650425.76 4188483.34 284.06694 (14022208) 650525.76
4188483.34 242.04445 (14022208)
650625.76 4188483.34 208.61257 (14022208) 650725.76
4188483.34 181.65845 (14022208)
650825.76 4188483.34 159.64691 (14022208) 651125.76
4188483.34 113.42374 (14022208)
649125.76 4188533.34 329.76024 (17120702) 649225.76
4188533.34 383.61948 (17120702)
649325.76 4188533.34 488.47481 (17122608) 649425.76
4188533.34 645.02672 (17011201)
649525.76 4188533.34 879.98907 (17121007) 649625.76
4188533.34 1056.98024 (17122609)
649725.76 4188533.34 1492.21222 (17122724) 650425.76
4188533.34 268.90860 (14021120)
650525.76 4188533.34 228.67328 (15122424) 650625.76
4188533.34 196.64490 (14021603)
650725.76 4188533.34 169.59746 (14021603) 650825.76
4188533.34 147.20514 (15020206)
651125.76 4188533.34 109.53019 (14022208) 649125.76
4188583.34 318.63895 (17122608)
649225.76 4188583.34 378.07779 (17122608) 649325.76
4188583.34 493.65414 (17011201)
649425.76 4188583.34 630.27534 (17020404) 649525.76
4188583.34 704.68190 (17043004)
649625.76 4188583.34 876.84310 (17122909) 649725.76
4188583.34 1193.02476 (17120219)
650425.76 4188583.34 268.92935 (15122617) 650525.76
4188583.34 224.31984 (14010519)
650625.76 4188583.34 192.88091 (14010519) 650725.76
4188583.34 165.09756 (14021120)
650825.76 4188583.34 147.63072 (15122424) 651125.76
4188583.34 106.87072 (14021603)
649125.76 4188633.34 325.33294 (17011201) 649225.76
4188633.34 384.49877 (17120707)
649325.76 4188633.34 479.23144 (17020404) 649425.76
4188633.34 517.75749 (17043004)
649525.76 4188633.34 562.19123 (17123024) 649625.76
4188633.34 762.51849 (17122909)
649725.76 4188633.34 975.98379 (17012717) 649825.76
4188633.34 999.69067 (17012905)
649925.76 4188633.34 858.01537 (17022706) 650025.76
4188633.34 667.01485 (17022407)
650125.76 4188633.34 509.40309 (17121119) 650225.76
4188633.34 384.92587 (14022307)
650325.76 4188633.34 319.34935 (14011317) 650425.76

4188633.34   263.31253 (15010317)
650525.76   4188633.34   221.22095 (13020204)   650625.76
4188633.34   191.86762 (15122617)

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2   ***
INCLUDING SOURCE(S):   VOL2   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
650725.76	4188633.34	164.12225	(13120917)	650825.76	4188633.34	146.80545	(14010519)
651125.76	4188633.34	105.15656	(15122424)	649125.76	4188683.34	317.90820	(17121007)
649225.76	4188683.34	378.49116	(17020404)	649325.76	4188683.34	398.99200	(17043004)
649425.76	4188683.34	413.69574	(17120208)	649525.76	4188683.34	496.58094	(17122909)
649625.76	4188683.34	642.98437	(17122724)	649725.76	4188683.34	820.67747	(17012717)
649825.76	4188683.34	805.97580	(17012905)	649925.76	4188683.34	729.04948	(17021405)
650025.76	4188683.34	591.77801	(17122321)	650125.76	4188683.34	465.41260	(17123020)
650225.76	4188683.34	365.14860	(17121119)	650325.76	4188683.34	301.17467	(14022307)
650425.76	4188683.34	255.88584	(14011317)	650525.76	4188683.34	214.48807	(13121420)
650625.76	4188683.34	189.66638	(15010317)	650725.76	4188683.34	162.36537	(13020204)
650825.76	4188683.34	145.99645	(15122617)	651125.76	4188683.34	105.24543	(14010519)
649125.76	4188733.34	307.67596	(17020404)	649225.76	4188733.34	318.30840	(17043004)
649325.76	4188733.34	322.83203	(17120624)	649425.76			

4188733.34 386.69685 (17123024)
649525.76 4188733.34 489.02129 (17122909) 649625.76
4188733.34 581.45562 (17022607)
649725.76 4188733.34 680.22523 (17012717) 649825.76
4188733.34 648.30139 (17012905)
649925.76 4188733.34 611.73263 (17022508) 650025.76
4188733.34 542.23625 (17012601)
650125.76 4188733.34 448.91512 (17022407) 650225.76
4188733.34 366.85220 (17123020)
650325.76 4188733.34 286.41763 (14012706) 650425.76
4188733.34 243.84013 (14022307)
650525.76 4188733.34 209.60439 (13020908) 650625.76
4188733.34 181.62355 (14011317)
650725.76 4188733.34 160.86956 (15010317) 650825.76
4188733.34 143.54343 (15010317)
651125.76 4188733.34 103.21465 (13032807) 649125.76
4188783.34 260.77688 (17043004)
649225.76 4188783.34 259.74524 (17043004) 649325.76
4188783.34 289.56156 (17120208)
649425.76 4188783.34 341.70574 (17123021) 649525.76
4188783.34 399.39190 (16120505)
649625.76 4188783.34 521.74801 (17120219) 649725.76
4188783.34 560.00203 (17012717)
649825.76 4188783.34 522.46676 (17012905) 649925.76
4188783.34 570.33295 (17022508)
650025.76 4188783.34 478.33007 (17022706) 650125.76
4188783.34 400.03946 (17122321)
650225.76 4188783.34 334.37774 (17022407) 650325.76
4188783.34 298.24156 (17121119)
650425.76 4188783.34 233.50738 (13121617) 650525.76
4188783.34 202.59288 (14022307)
650625.76 4188783.34 178.33017 (13020908) 650725.76
4188783.34 158.05343 (14011317)
650825.76 4188783.34 138.68398 (13121420) 651125.76
4188783.34 102.76653 (15122617)
649125.76 4188833.34 227.33161 (17043004) 649225.76
4188833.34 239.50660 (17120208)
649325.76 4188833.34 282.00174 (17123024) 649425.76
4188833.34 341.57278 (17122909)
649525.76 4188833.34 377.58628 (17122724) 649625.76
4188833.34 453.78451 (17120219)
649725.76 4188833.34 479.41129 (17020802) 649825.76
4188833.34 465.04280 (17012720)
649925.76 4188833.34 492.64071 (17022508) 650025.76
4188833.34 439.99394 (17021405)
650125.76 4188833.34 369.04615 (17122321) 650225.76
4188833.34 322.39428 (17022407)
650325.76 4188833.34 268.71464 (17123020) 650425.76
4188833.34 243.62235 (17121119)
650525.76 4188833.34 196.23120 (17120617) 650625.76

4188833.34   171.77765 (14022307)
       650725.76   4188833.34   153.45784 (13020908)   650825.76
4188833.34   137.80998 (14011317)
       651125.76   4188833.34   103.32600 (15010317)   649125.76
4188883.34   199.27555 (17121808)

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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL2   ***
INCLUDING SOURCE(S):   VOL2   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
649225.76	4188883.34	222.30525	(17123024)	649325.76	4188883.34	254.92857	(17123021)
649425.76	4188883.34	298.81200	(17020506)	649525.76	4188883.34	342.16328	(17022607)
649625.76	4188883.34	364.17349	(17120219)	649725.76	4188883.34	429.69666	(17120618)
649825.76	4188883.34	417.55839	(17012720)	649925.76	4188883.34	413.51706	(17121401)
650025.76	4188883.34	369.78086	(17121904)	650125.76	4188883.34	348.88312	(17012601)
650225.76	4188883.34	291.36225	(17122321)	650325.76	4188883.34	267.05867	(17022407)
650425.76	4188883.34	232.37636	(17123020)	650525.76	4188883.34	200.06335	(17121119)
650625.76	4188883.34	168.00616	(17120617)	650725.76	4188883.34	148.03881	(14022307)
650825.76	4188883.34	133.40539	(13020908)	651125.76	4188883.34	99.19996	(13121420)
650125.76	4188933.34	314.85109	(17022706)	650225.76	4188933.34	285.98678	(17122321)
650325.76	4188933.34	242.70263	(17022407)	650425.76	4188933.34	202.21885	(17120122)
650525.76	4188933.34	195.53171	(17123020)	650625.76			

4188933.34   165.57217 (17121119)
        650725.76   4188933.34   145.89141 (17120617)   650825.76
4188933.34   129.27671 (14022307)
        651125.76   4188933.34   98.59980 (14011317)   650425.76
4188983.34   216.07445 (17022407)
        650525.76   4188983.34   179.55698 (17123020)   650625.76
4188983.34   170.83516 (17121119)
        650725.76   4188983.34   140.18358 (14012706)   650825.76
4188983.34   128.18569 (17120617)
        651125.76   4188983.34   96.31138 (14022106)   650525.76
4189033.34   175.40224 (17022407)
        650625.76   4189033.34   163.05357 (17123020)   650725.76
4189033.34   149.32454 (17121119)
        650825.76   4189033.34   123.84825 (14012706)   651125.76
4189033.34   94.15169 (14022307)
        650525.76   4189083.34   177.39619 (17022407)   650625.76
4189083.34   141.28669 (13121217)
        650725.76   4189083.34   144.32553 (17123020)   650825.76
4189083.34   130.28488 (17121119)
        651125.76   4189083.34   91.44396 (14022307)   650525.76
4189133.34   157.24129 (14011617)
        650625.76   4189133.34   152.35936 (17022407)   650725.76
4189133.34   130.56285 (17123020)
        650825.76   4189133.34   125.74049 (17123020)   651125.76
4189133.34   91.83566 (17120617)
        650781.98   4189510.65   104.73102 (17122321)   650760.33
4189397.50   106.21038 (17120205)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3   ***
INCLUDING SOURCE(S):   VOL3   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

     X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M)
Y-COORD (M)   CONC   (YYMMDDHH)
- -
        649676.34   4188314.55   681.33150 (14021105)   649629.66

4188294.84 630.80116 (17123007)
649810.15 4188312.48 742.23278 (15011509) 649364.10
4188360.20 440.46022 (15010907)
649327.80 4188355.01 426.41183 (17120517) 649380.70
4188758.52 572.58347 (17011201)
650495.81 4188841.51 233.69794 (15010317) 650597.47
4188832.17 200.12253 (15122617)
650536.27 4188878.85 211.69913 (15010317) 650577.76
4188877.81 203.24711 (15010317)
650602.66 4188860.18 195.31754 (13020204) 650610.95
4188880.93 193.74461 (15010317)
650638.10 4188858.53 184.66770 (15122617) 650664.10
4188331.03 166.35844 (17020824)
650668.72 4188350.83 159.56668 (17011303) 650677.96
4188379.86 165.71262 (17011303)
650699.74 4188414.84 165.67270 (17121319) 650758.47
4188658.36 169.41617 (14022208)
650765.73 4188678.82 172.24310 (14022208) 650773.65
4188706.54 165.36831 (14022208)
650778.27 4188726.34 157.08260 (15020206) 650805.33
4188805.53 147.44902 (14010519)
650806.65 4188824.01 150.33329 (14010519) 650811.27
4188843.81 147.74195 (14010519)
650814.57 4188862.29 146.26042 (13032807) 650846.24
4188924.98 139.44568 (13020204)
650850.86 4188951.38 139.63616 (15010317) 650854.82
4188976.46 136.04548 (15010317)
650698.00 4188307.32 160.80008 (17020824) 650692.60
4188291.80 160.95256 (17020824)
650724.82 4189245.80 148.50793 (17121119) 650726.07
4189273.37 143.89672 (17123020)
650856.27 4189006.30 132.77623 (13121420) 650857.23
4189022.60 132.45675 (14010220)
650859.15 4189041.29 132.53683 (14011317) 650859.15
4189058.54 130.63072 (14011317)
650860.58 4189076.28 129.14062 (13020908) 650861.54
4189094.49 128.37911 (13020908)
650857.71 4189113.19 126.48900 (14022307) 650847.16
4189118.94 128.74957 (14022307)
650848.12 4189134.76 127.65532 (14022307) 650850.04
4189155.37 123.63494 (13121319)
650851.48 4189171.66 122.84163 (17120617) 650853.87
4189184.12 123.71946 (17120617)
650856.75 4189199.46 123.38424 (17120617) 650857.71
4189213.36 121.87665 (17120617)
650860.58 4189226.30 119.22685 (17120617) 650862.50
4189242.60 118.73028 (14012706)
650865.38 4189258.42 117.79736 (14012706) 650867.77
4189275.19 118.12554 (13103008)
650868.73 4189291.49 120.99385 (13103008) 650872.09

4189309.23 122.31833 (17121119)
650874.00 4189325.04 123.12632 (17121119) 650875.92
4189340.38 122.51045 (17121119)
650878.80 4189355.24 120.62518 (17121119) 650881.19
4189373.45 117.38600 (17123020)
650884.55 4189390.71 117.78872 (17123020) 650888.86
4189407.01 116.68332 (17123020)
650889.82 4189427.14 113.75579 (17123020) 650891.74
4189443.43 109.84905 (17123020)
650895.09 4189461.17 104.51445 (17123020) 650898.45
4189475.55 99.61837 (17123020)
650898.45 4189489.93 97.87820 (13121217) 650902.28
4189504.31 97.09061 (13121217)
650709.41 4188344.56 153.57388 (17011303) 650722.45
4188284.03 155.01084 (17020824)
650745.73 4188280.30 150.72523 (17020824) 650735.49
4188223.50 151.05914 (17122619)
650721.52 4188167.62 141.71718 (17011509) 650525.76
4188133.34 225.61151 (17011509)
651125.76 4188133.34 97.13339 (17020824) 649125.76
4188183.34 251.98777 (17123107)
649225.76 4188183.34 290.08656 (14120608) 649325.76
4188183.34 334.54943 (13013108)
649425.76 4188183.34 368.65301 (15122802) 649525.76
4188183.34 416.76867 (17121508)
649625.76 4188183.34 464.41953 (14021105) 649725.76
4188183.34 560.13257 (17011609)
649825.76 4188183.34 508.07070 (17120822) 649925.76
4188183.34 504.15825 (17122701)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3 ***
INCLUDING SOURCE(S): VOL3 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -

- -
650025.76 4188183.34 457.80893 (17020801) 650125.76
4188183.34 370.99174 (17120120)
650225.76 4188183.34 317.46796 (17012908) 650325.76
4188183.34 302.04352 (17122320)
650425.76 4188183.34 261.20556 (17121219) 650525.76
4188183.34 264.91468 (17011509)
650625.76 4188183.34 202.66189 (17011509) 650725.76
4188183.34 146.42640 (17122619)
650825.76 4188183.34 134.38606 (17122619) 651125.76
4188183.34 93.48001 (17020824)
649125.76 4188233.34 276.21558 (17120517) 649225.76
4188233.34 304.20239 (13012105)
649325.76 4188233.34 350.26234 (13021704) 649425.76
4188233.34 408.71026 (16010309)
649525.76 4188233.34 464.21538 (13020205) 649625.76
4188233.34 534.33189 (17122918)
649725.76 4188233.34 639.44861 (17011609) 649825.76
4188233.34 593.85865 (17122917)
649925.76 4188233.34 567.53658 (17012804) 650025.76
4188233.34 509.85489 (17020801)
650125.76 4188233.34 420.41553 (17012908) 650225.76
4188233.34 333.73197 (17122320)
650325.76 4188233.34 319.89659 (17121219) 650425.76
4188233.34 312.22040 (17011509)
650525.76 4188233.34 244.62500 (17011509) 650625.76
4188233.34 170.84346 (17122619)
650725.76 4188233.34 152.03700 (17122619) 650825.76
4188233.34 133.04206 (17020824)
651125.76 4188233.34 97.08054 (17011303) 649125.76
4188283.34 293.90113 (17121504)
649225.76 4188283.34 323.42589 (17120517) 649325.76
4188283.34 376.75846 (13010908)
649425.76 4188283.34 448.64431 (13013108) 649525.76
4188283.34 518.32390 (15010507)
649625.76 4188283.34 610.70165 (17123007) 649725.76
4188283.34 728.82907 (17011609)
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4188283.34 660.03428 (17122620)
650025.76 4188283.34 543.85755 (17120120) 650125.76
4188283.34 436.47388 (17012908)
650225.76 4188283.34 391.40572 (17122320) 650325.76
4188283.34 370.35867 (17011509)
650425.76 4188283.34 301.04733 (17011509) 650525.76
4188283.34 202.57504 (17122619)
650625.76 4188283.34 173.41914 (17121906) 650725.76
4188283.34 154.38906 (17020824)
650825.76 4188283.34 131.42179 (17020824) 651125.76
4188283.34 95.30529 (17121319)
649125.76 4188333.34 305.25237 (17021420) 649225.76

4188333.34 357.26572 (17121504)
649325.76 4188333.34 395.71658 (15010907) 649425.76
4188333.34 477.78068 (13010906)
649525.76 4188333.34 577.72516 (16010309) 649625.76
4188333.34 653.19164 (15022608)
649725.76 4188333.34 827.25296 (17011609) 649825.76
4188333.34 844.08099 (17122917)
649925.76 4188333.34 745.99913 (17012903) 650025.76
4188333.34 568.68235 (17012908)
650125.76 4188333.34 485.27302 (17122320) 650225.76
4188333.34 440.72260 (17011509)
650325.76 4188333.34 379.38682 (17011509) 650425.76
4188333.34 244.99024 (17122619)
650525.76 4188333.34 205.38543 (17121906) 650625.76
4188333.34 178.51910 (17020824)
650725.76 4188333.34 147.34061 (17011303) 650825.76
4188333.34 136.29353 (17011303)
651125.76 4188333.34 100.95351 (17121319) 649125.76
4188383.34 326.15496 (17021308)
649225.76 4188383.34 373.42114 (17021420) 649325.76
4188383.34 446.79287 (17121504)
649425.76 4188383.34 514.01566 (13012121) 649525.76
4188383.34 646.96167 (13013108)
649625.76 4188383.34 780.24341 (13020205) 649725.76
4188383.34 931.62835 (17011609)
649825.76 4188383.34 1003.10979 (17122917) 649925.76
4188383.34 854.61854 (17020801)
650025.76 4188383.34 647.19646 (17012908) 650125.76
4188383.34 543.39780 (17121219)
650225.76 4188383.34 492.49960 (17011509) 650325.76
4188383.34 303.73410 (17122619)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3 ***
INCLUDING SOURCE(S): VOL3 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M)

Y-COORD (M)   CONC   (YYMMDDHH)

- -

650425.76   4188383.34   245.84266 (17121906)   650525.76
4188383.34   204.47239 (17020824)
650625.76   4188383.34   177.94187 (17011303)   650725.76
4188383.34   151.79293 (17011303)
650825.76   4188383.34   140.24948 (17121319)   651125.76
4188383.34   100.09742 (17010504)
649125.76   4188433.34   322.53776 (17123023)   649225.76
4188433.34   401.42875 (17021308)
649325.76   4188433.34   469.07203 (17120203)   649425.76
4188433.34   580.38939 (17121504)
649525.76   4188433.34   702.67855 (13010908)   649625.76
4188433.34   895.47303 (15122802)
649725.76   4188433.34   1078.55969 (13012120)   649825.76
4188433.34   1182.98808 (17122917)
649925.76   4188433.34   940.36616 (17120120)   650025.76
4188433.34   741.51535 (17122320)
650125.76   4188433.34   664.07302 (17011509)   650225.76
4188433.34   388.88676 (17122619)
650325.76   4188433.34   306.41116 (17020824)   650425.76
4188433.34   244.49608 (17011303)
650525.76   4188433.34   207.01436 (17011303)   650625.76
4188433.34   184.44378 (17121319)
650725.76   4188433.34   157.42887 (17121319)   650825.76
4188433.34   139.75128 (17010504)
651125.76   4188433.34   107.05283 (17122519)   649125.76
4188483.34   329.32707 (17013105)
649225.76   4188483.34   391.98146 (17121207)   649325.76
4188483.34   490.99748 (17021308)
649425.76   4188483.34   625.44530 (17021308)   649525.76
4188483.34   795.63793 (17120517)
649625.76   4188483.34   1053.26530 (13013108)   649725.76
4188483.34   1360.74636 (14012608)
650425.76   4188483.34   258.18247 (17121319)   650525.76
4188483.34   214.13541 (17010504)
650625.76   4188483.34   184.97649 (17122519)   650725.76
4188483.34   167.78054 (17122519)
650825.76   4188483.34   149.65515 (17122519)   651125.76
4188483.34   104.95606 (17122719)
649125.76   4188533.34   336.40811 (17022506)   649225.76
4188533.34   404.52353 (17022506)
649325.76   4188533.34   503.67498 (17013105)   649425.76
4188533.34   638.08072 (17121823)
649525.76   4188533.34   916.45372 (17021308)   649625.76
4188533.34   1190.49287 (17120517)
649725.76   4188533.34   1758.88136 (14021408)   650425.76
4188533.34   273.35222 (17122519)
650525.76   4188533.34   229.77678 (17122519)   650625.76

4188533.34   191.74817 (17122519)
       650725.76   4188533.34   166.50621 (17122719)   650825.76
4188533.34   145.36566 (17122719)
       651125.76   4188533.34   101.55904 (17122621)   649125.76
4188583.34   327.99560 (17013008)
       649225.76   4188583.34   403.57727 (17121807)   649325.76
4188583.34   510.66925 (17121807)
       649425.76   4188583.34   659.14096 (17022506)   649525.76
4188583.34   907.77489 (17022506)
       649625.76   4188583.34   1407.08353 (17021308)   649725.76
4188583.34   0.00000 (00000000)
       650425.76   4188583.34   265.93349 (17122621)   650525.76
4188583.34   224.25517 (17122621)
       650625.76   4188583.34   191.79763 (17122621)   650725.76
4188583.34   166.06578 (17122621)
       650825.76   4188583.34   145.32107 (17122621)   651125.76
4188583.34   102.47307 (17122621)
       649125.76   4188633.34   346.84178 (17011505)   649225.76
4188633.34   419.97488 (17011505)
       649325.76   4188633.34   523.44462 (17011505)   649425.76
4188633.34   678.43152 (17011505)
       649525.76   4188633.34   929.91503 (17011505)   649625.76
4188633.34   1417.32300 (17121203)
       649725.76   4188633.34   0.00000 (00000000)   649825.76
4188633.34   0.00000 (00000000)
       649925.76   4188633.34   1412.41421 (14022208)   650025.76
4188633.34   861.71996 (14022208)
       650125.76   4188633.34   592.83626 (14022208)   650225.76
4188633.34   438.19586 (14022208)
       650325.76   4188633.34   339.92512 (14022208)   650425.76
4188633.34   273.16824 (16010203)
       650525.76   4188633.34   228.00557 (16010203)   650625.76
4188633.34   194.14946 (16010203)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3   ***
INCLUDING SOURCE(S):   VOL3   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
650725.76	4188633.34	167.97776	(16010203)	650825.76	4188633.34	147.22916	(16010203)
651125.76	4188633.34	105.16249	(16010203)	649125.76	4188683.34	341.09669	(17122903)
649225.76	4188683.34	413.24023	(17011121)	649325.76	4188683.34	523.13922	(17121322)
649425.76	4188683.34	670.95664	(17121322)	649525.76	4188683.34	887.39021	(17122608)
649625.76	4188683.34	1374.37108	(17011201)	649725.76	4188683.34	2142.89174	(17122909)
649825.76	4188683.34	0.00000	(00000000)	649925.76	4188683.34	1320.07540	(14011317)
650025.76	4188683.34	808.14331	(13032807)	650125.76	4188683.34	562.94467	(14021120)
650225.76	4188683.34	429.77529	(14021603)	650325.76	4188683.34	340.52968	(14022208)
650425.76	4188683.34	285.63567	(14022208)	650525.76	4188683.34	242.80291	(14022208)
650625.76	4188683.34	208.89988	(14022208)	650725.76	4188683.34	181.66832	(14022208)
650825.76	4188683.34	159.49326	(14022208)	651125.76	4188683.34	113.09579	(14022208)
649125.76	4188733.34	329.16994	(17120702)	649225.76	4188733.34	385.97281	(17120702)
649325.76	4188733.34	485.50754	(17122608)	649425.76	4188733.34	639.33450	(17011201)
649525.76	4188733.34	878.33545	(17121007)	649625.76	4188733.34	1078.04311	(17121402)
649725.76	4188733.34	1506.36081	(17122724)	649825.76	4188733.34	1834.14400	(17022508)
649925.76	4188733.34	1148.61962	(17121119)	650025.76	4188733.34	771.41647	(14011317)
650125.76	4188733.34	550.75919	(15010317)	650225.76	4188733.34	419.10101	(13032807)
650325.76	4188733.34	332.76191	(14010519)	650425.76	4188733.34	268.82883	(14021120)
650525.76	4188733.34	228.41354	(15122424)	650625.76	4188733.34	196.49632	(14021603)
650725.76	4188733.34	169.03348	(14021603)	650825.76	4188733.34	147.48298	(15020206)
651125.76	4188733.34	109.98815	(14022208)	649125.76	4188783.34	317.33990	(17122608)
649225.76	4188783.34	379.86875	(17122608)	649325.76	4188783.34	494.29798	(17011201)
649425.76	4188783.34	627.84387	(17020404)	649525.76			

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 4188783.34      709.03671  (17043004)
        649625.76   4188783.34      871.45368  (17122909)                649725.76
 4188783.34     1201.78055  (17120219)
        649825.76   4188783.34     1311.63009  (17022508)                649925.76
 4188783.34      989.38550  (17122321)
        650025.76   4188783.34      740.78424  (17121119)                650125.76
 4188783.34      521.23472  (13020908)
        650225.76   4188783.34      402.07794  (14011317)                650325.76
 4188783.34      325.15650  (13020204)
        650425.76   4188783.34      268.13303  (15122617)                650525.76
 4188783.34      224.75628  (14010519)
        650625.76   4188783.34      192.28988  (14010519)                650725.76
 4188783.34      165.15725  (14021120)
        650825.76   4188783.34      147.75368  (15122424)                651125.76
 4188783.34      106.65789  (14021603)
        649125.76   4188833.34      324.03366  (17011201)                649225.76
 4188833.34      384.22450  (17120707)
        649325.76   4188833.34      478.90989  (17020404)                649425.76
 4188833.34      518.85355  (17043004)
        649525.76   4188833.34      564.07054  (17120208)                649625.76
 4188833.34      769.95811  (17122909)
        649725.76   4188833.34      979.09386  (17012717)                649825.76
 4188833.34     1004.11304  (17012905)
        649925.76   4188833.34      860.62082  (17022706)                650025.76
 4188833.34      665.58449  (17022407)
        650125.76   4188833.34      505.71654  (17121119)                650225.76
 4188833.34      384.47756  (14022307)
        650325.76   4188833.34      318.88266  (14011317)                650425.76
 4188833.34      263.78960  (15010317)
        650525.76   4188833.34      220.57853  (13020204)                650625.76
 4188833.34      191.46592  (15122617)
        650725.76   4188833.34      164.16731  (13120917)                650825.76
 4188833.34      146.77074  (14010519)
        651125.76   4188833.34      105.34230  (15122424)                649125.76
 4188883.34      316.50395  (17121007)
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 *** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL3   ***

INCLUDING SOURCE(S):   VOL3   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
649225.76	4188883.34	379.04071	(17020404)	649325.76	4188883.34	398.82797	(17043004)
649425.76	4188883.34	413.29783	(17120208)	649525.76	4188883.34	495.77759	(14012407)
649625.76	4188883.34	644.96329	(17122724)	649725.76	4188883.34	824.07387	(17012717)
649825.76	4188883.34	810.20193	(17012905)	649925.76	4188883.34	733.46895	(17021405)
650025.76	4188883.34	589.73337	(17122321)	650125.76	4188883.34	468.22807	(17123020)
650225.76	4188883.34	364.77467	(14012706)	650325.76	4188883.34	301.23630	(14022307)
650425.76	4188883.34	256.34545	(14011317)	650525.76	4188883.34	214.33746	(13121420)
650625.76	4188883.34	189.43108	(15010317)	650725.76	4188883.34	162.36800	(15122617)
650825.76	4188883.34	145.76914	(15122617)	651125.76	4188883.34	105.11015	(14010519)
650125.76	4188933.34	450.11949	(17022407)	650225.76	4188933.34	366.96287	(17121119)
650325.76	4188933.34	285.78186	(14012706)	650425.76	4188933.34	244.11456	(14022307)
650525.76	4188933.34	209.10641	(14011317)	650625.76	4188933.34	181.36979	(14010220)
650725.76	4188933.34	161.34439	(15010317)	650825.76	4188933.34	143.12118	(15010317)
651125.76	4188933.34	103.11460	(13032807)	650425.76	4188983.34	234.22277	(13121617)
650525.76	4188983.34	202.94963	(14022307)	650625.76	4188983.34	178.21877	(13020908)
650725.76	4188983.34	157.86438	(14011317)	650825.76	4188983.34	138.55455	(13121420)
651125.76	4188983.34	103.01923	(15122617)	650525.76	4189033.34	196.64027	(17120617)
650625.76	4189033.34	172.15697	(14022307)	650725.76	4189033.34	153.56967	(13020908)
650825.76	4189033.34	137.89561	(14011317)	651125.76	4189033.34	103.22294	(15010317)
650525.76	4189083.34	199.11722	(17121119)	650625.76	4189083.34	168.21974	(17120617)
650725.76	4189083.34	148.41358	(14022307)	650825.76	4189083.34	133.64051	(13020908)
651125.76	4189083.34	99.09860	(13121420)	650525.76			

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       650625.76   4189133.34   164.51674 (17121119)   650725.76
4189133.34   145.98691 (17120617)
       650825.76   4189133.34   129.63421 (14022307)   651125.76
4189133.34   98.49643 (14011317)
       650781.98   4189510.65   120.70473 (17022407)   650760.33
4189397.50   115.81421 (17120122)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4   ***
INCLUDING SOURCE(S):   VOL4   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
649676.34	4188314.55	278.37453	(17021420)	649629.66	4188294.84	257.92821	(17021420)
649810.15	4188312.48	337.68656	(17120517)	649364.10	4188360.20	188.39157	(17121207)
649327.80	4188355.01	180.56192	(17121207)	649380.70	4188758.52	205.09389	(17121322)
650495.81	4188841.51	886.88555	(17021405)	650597.47	4188832.17	707.77695	(17022407)
650536.27	4188878.85	725.77981	(17021405)	650577.76	4188877.81	667.60085	(17012601)
650602.66	4188860.18	632.59100	(17122321)	650610.95	4188880.93	612.03619	(17122321)
650638.10	4188858.53	611.04759	(17022407)	650664.10	4188331.03	541.76979	(17012908)
650668.72	4188350.83	515.63737	(17012908)	650677.96	4188379.86	568.62497	(17122320)
650699.74	4188414.84	617.56785	(17011509)	650758.47	4188658.36	542.18270	(14022208)
650765.73	4188678.82	495.83581	(14021603)	650773.65	4188706.54	476.43311	(14010519)
650778.27	4188726.34	468.75237	(13032807)	650805.33			

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4188976.46 328.03347 (17123020)
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650859.15 4189041.29 307.91674 (17022407) 650859.15
4189058.54 302.80534 (17022407)
650860.58 4189076.28 288.24606 (17022407) 650861.54
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650848.12 4189134.76 274.42728 (17122321) 650850.04
4189155.37 271.23618 (17122321)
650851.48 4189171.66 263.74918 (17122321) 650853.87
4189184.12 255.69870 (17122321)
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649625.76   4188183.34   233.92308 (17120517)   649725.76
4188183.34   250.61592 (13012121)
649825.76   4188183.34   288.31564 (14120608)   649925.76
4188183.34   329.25653 (13013108)

*** AERMOD - VERSION 19191 ***   *** C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley ***   10/26/23
*** AERMET - VERSION 18081 ***   ***   ***   16:20:52

PAGE 58
*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4   ***
INCLUDING SOURCE(S):   VOL4   ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M)
Y-COORD (M)   CONC   (YYMMDDHH)
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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4 ***
INCLUDING SOURCE(S): VOL4 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
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       649725.76   4188633.34      346.77514  (17011505)                649825.76
 4188633.34      419.76900  (17011505)
       649925.76   4188633.34      522.98698  (17011505)                650025.76
 4188633.34      677.52814  (17011505)
       650125.76   4188633.34      928.30124  (17011505)                650225.76
 4188633.34     1398.75027  (17121203)
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 4188633.34        0.00000  (00000000)
       650525.76   4188633.34     1334.00590  (14022208)                650625.76
 4188633.34      817.61411  (14022208)
↑ *** AERMOD - VERSION  19191 ***   *** C:\Users\Smith\Dropbox\My PC
(DESKTOP-977GSBU)\Documents\HRA\Ashley  ***        10/26/23
 *** AERMET - VERSION  18081 ***   ***
                       ***       16:20:52

                                              PAGE  60
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  RURAL  ADJ_U*

                              *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  VOL4     ***
                                  INCLUDING SOURCE(S):     VOL4        ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                           ** CONC OF OTHER    IN MICROGRAMS/M**3
                    **

      X-COORD (M)  Y-COORD (M)        CONC     (YYMMDDHH)              X-COORD (M)
Y-COORD (M)        CONC     (YYMMDDHH)
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - -
       650725.76   4188633.34      564.72017  (14022208)                650825.76
 4188633.34      418.82287  (14022208)
       651125.76   4188633.34      223.38464  (16010203)                649125.76
 4188683.34      152.87762  (17013107)
       649225.76   4188683.34      171.23998  (17013107)                649325.76
 4188683.34      193.09269  (17013107)
       649425.76   4188683.34      219.39162  (17013107)                649525.76
 4188683.34      251.36145  (17013107)
       649625.76   4188683.34      290.64865  (17013107)                649725.76
 4188683.34      339.47393  (17013107)
       649825.76   4188683.34      412.89166  (17122903)                649925.76
 4188683.34      519.87952  (17121322)
       650025.76   4188683.34      678.14670  (17121322)                650125.76
 4188683.34      882.46798  (17121322)
       650225.76   4188683.34     1380.60512  (17011201)                650325.76
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4188683.34 0.00000 (00000000)
650425.76 4188683.34 0.00000 (00000000) 650525.76
4188683.34 1268.18998 (14011317)
650625.76 4188683.34 780.95833 (14010519) 650725.76
4188683.34 555.88277 (14021603)
650825.76 4188683.34 420.28835 (14021603) 651125.76
4188683.34 242.21971 (14022208)
649125.76 4188733.34 152.42143 (17122903) 649225.76
4188733.34 170.51978 (17122903)
649325.76 4188733.34 190.85036 (17122903) 649425.76
4188733.34 214.06096 (17011121)
649525.76 4188733.34 248.97867 (17121322) 649625.76
4188733.34 289.91243 (17121322)
649725.76 4188733.34 334.15022 (17121322) 649825.76
4188733.34 391.28984 (17120702)
649925.76 4188733.34 480.99809 (17122608) 650025.76
4188733.34 632.01718 (17122608)
650125.76 4188733.34 878.05448 (17121007) 650225.76
4188733.34 1123.34346 (17121402)
650325.76 4188733.34 1538.10190 (17122724) 650425.76
4188733.34 1815.22842 (17022508)
650525.76 4188733.34 1147.21872 (17121119) 650625.76
4188733.34 767.09884 (14011317)
650725.76 4188733.34 537.99025 (13020204) 650825.76
4188733.34 411.78543 (13032807)
651125.76 4188733.34 226.99395 (14021603) 649125.76
4188783.34 153.08586 (17121322)
649225.76 4188783.34 170.19461 (17121322) 649325.76
4188783.34 187.68118 (17121322)
649425.76 4188783.34 208.97061 (17120702) 649525.76
4188783.34 235.90776 (17120702)
649625.76 4188783.34 257.07121 (17120702) 649725.76
4188783.34 315.52473 (17122608)
649825.76 4188783.34 384.46417 (17122608) 649925.76
4188783.34 496.65365 (17011201)
650025.76 4188783.34 627.99826 (17121007) 650125.76
4188783.34 730.70715 (17121402)
650225.76 4188783.34 882.49520 (17122909) 650325.76
4188783.34 1211.66032 (17120219)
650425.76 4188783.34 1358.85766 (17022508) 650525.76
4188783.34 960.17549 (17122321)
650625.76 4188783.34 718.72756 (17121119) 650725.76
4188783.34 517.36159 (13020908)
650825.76 4188783.34 396.96850 (15010317) 651125.76
4188783.34 223.63238 (14010519)
649125.76 4188833.34 148.09906 (17120702) 649225.76
4188833.34 162.20130 (17120702)
649325.76 4188833.34 173.07029 (17120702) 649425.76
4188833.34 185.74377 (17122608)
649525.76 4188833.34 227.63095 (17122608) 649625.76

4188833.34 265.64636 (17122608)
649725.76 4188833.34 322.31285 (17011201) 649825.76
4188833.34 384.28132 (17120707)
649925.76 4188833.34 479.67709 (17020404) 650025.76
4188833.34 525.89110 (17121402)
650125.76 4188833.34 573.37883 (17120208) 650225.76
4188833.34 782.36404 (17122909)
650325.76 4188833.34 1006.29178 (17012717) 650425.76
4188833.34 998.52377 (17012905)
650525.76 4188833.34 849.59736 (17022706) 650625.76
4188833.34 645.00737 (17022407)
650725.76 4188833.34 483.52401 (17121119) 650825.76
4188833.34 382.28058 (13020908)
651125.76 4188833.34 218.91368 (15122617) 649125.76
4188883.34 132.70768 (17013104)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL4 ***
INCLUDING SOURCE(S): VOL4 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -
649225.76 4188883.34 147.55289 (17122608) 649325.76
4188883.34 174.36066 (17122608)
649425.76 4188883.34 197.87717 (17122608) 649525.76
4188883.34 225.27157 (17011201)
649625.76 4188883.34 273.50921 (17011201) 649725.76
4188883.34 314.77993 (17122805)
649825.76 4188883.34 380.90117 (17020404) 649925.76
4188883.34 402.49106 (17121402)
650025.76 4188883.34 415.46847 (17120208) 650125.76
4188883.34 501.08939 (17010902)
650225.76 4188883.34 651.98715 (17122724) 650325.76
4188883.34 835.62370 (17012717)
650425.76 4188883.34 819.81256 (17012905) 650525.76

4188883.34 738.99480 (17021405)
650625.76 4188883.34 568.62125 (17122321) 650725.76
4188883.34 469.99341 (17123020)
650825.76 4188883.34 361.31578 (13121617) 651125.76
4188883.34 212.08622 (15010317)
650125.76 4188933.34 495.83390 (17122909) 650225.76
4188933.34 587.09363 (17022607)
650325.76 4188933.34 686.46299 (17012717) 650425.76
4188933.34 669.05639 (17012905)
650525.76 4188933.34 598.03730 (17122223) 650625.76
4188933.34 531.71376 (17012601)
650725.76 4188933.34 447.13457 (17022407) 650825.76
4188933.34 368.92287 (17121119)
651125.76 4188933.34 209.75412 (14011317) 650425.76
4188983.34 545.32815 (17012905)
650525.76 4188983.34 565.27396 (17022508) 650625.76
4188983.34 479.03030 (17022706)
650725.76 4188983.34 384.73991 (17022408) 650825.76
4188983.34 318.10194 (17022407)
651125.76 4188983.34 202.11275 (14022307) 650525.76
4189033.34 501.26104 (17022508)
650625.76 4189033.34 437.82060 (17021405) 650725.76
4189033.34 376.04856 (17122321)
650825.76 4189033.34 326.73671 (17022407) 651125.76
4189033.34 196.12423 (17120617)
650525.76 4189083.34 419.44209 (17022508) 650625.76
4189083.34 380.35525 (17021405)
650725.76 4189083.34 351.68416 (17012601) 650825.76
4189083.34 286.64459 (17022408)
651125.76 4189083.34 193.89026 (17121119) 650525.76
4189133.34 375.54481 (17121401)
650625.76 4189133.34 328.26892 (17122223) 650725.76
4189133.34 316.98608 (17022706)
650825.76 4189133.34 287.25441 (17122321) 651125.76
4189133.34 196.46538 (17121119)
650781.98 4189510.65 166.47668 (17122223) 650760.33
4189397.50 194.58059 (17121904)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS

***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
649676.34	4188314.55	423.05774	(13010908)	649629.66	4188294.84	380.57923	(13012105)
649810.15	4188312.48	535.64538	(16010309)	649364.10	4188360.20	290.61312	(17021308)
649327.80	4188355.01	275.31484	(17021308)	649380.70	4188758.52	293.25637	(17120702)
650495.81	4188841.51	417.38901	(13121617)	650597.47	4188832.17	342.21323	(14011317)
650536.27	4188878.85	363.55279	(13121617)	650577.76	4188877.81	334.87511	(13121617)
650602.66	4188860.18	324.15412	(13020908)	650610.95	4188880.93	312.93933	(14022307)
650638.10	4188858.53	306.27688	(13020908)	650664.10	4188331.03	331.41206	(17011509)
650668.72	4188350.83	281.47680	(17011509)	650677.96	4188379.86	277.77204	(17122619)
650699.74	4188414.84	266.90230	(17020824)	650758.47	4188658.36	280.15492	(14022208)
650765.73	4188678.82	273.30505	(14022208)	650773.65	4188706.54	254.83784	(14021603)
650778.27	4188726.34	251.17118	(15122424)	650805.33	4188805.53	235.54111	(15122617)
650806.65	4188824.01	230.28096	(13020204)	650811.27	4188843.81	230.32998	(15010317)
650814.57	4188862.29	226.19534	(15010317)	650846.24	4188924.98	209.17931	(14011317)
650850.86	4188951.38	203.08959	(13020908)	650854.82	4188976.46	197.07935	(14022307)
650698.00	4188307.32	315.99650	(17011509)	650692.60	4188291.80	339.45866	(17011509)
650724.82	4189245.80	189.72508	(17120205)	650726.07	4189273.37	186.79814	(17022408)
650856.27	4189006.30	190.63691	(14022307)	650857.23	4189022.60	190.19772	(17120617)
650859.15	4189041.29	189.56766	(17120617)	650859.15	4189058.54	184.20097	(14012706)
650860.58	4189076.28	183.57926	(14012706)	650861.54	4189094.49	186.83868	(17121119)
650857.71	4189113.19	194.13366	(17121119)	650847.16	4189118.94	197.68962	(17121119)
650848.12	4189134.76	193.94816	(17121119)	650850.04			

4189155.37 190.05293 (17123020)
650851.48 4189171.66 187.22574 (17123020) 650853.87
4189184.12 182.57263 (17123020)
650856.75 4189199.46 174.63609 (17123020) 650857.71
4189213.36 165.20994 (17123020)
650860.58 4189226.30 158.65009 (13121217) 650862.50
4189242.60 160.74090 (17120122)
650865.38 4189258.42 164.16057 (17022407) 650867.77
4189275.19 167.86953 (17022407)
650868.73 4189291.49 169.52409 (17022407) 650872.09
4189309.23 167.90786 (17022407)
650874.00 4189325.04 164.56834 (17022407) 650875.92
4189340.38 159.51839 (17022407)
650878.80 4189355.24 153.36125 (17022407) 650881.19
4189373.45 146.14889 (14011617)
650884.55 4189390.71 143.88729 (17120205) 650888.86
4189407.01 141.59199 (17120205)
650889.82 4189427.14 138.42096 (17022408) 650891.74
4189443.43 138.95353 (17022408)
650895.09 4189461.17 137.64491 (17022408) 650898.45
4189475.55 135.51718 (17022408)
650898.45 4189489.93 137.31768 (17122321) 650902.28
4189504.31 137.34611 (17122321)
650709.41 4188344.56 257.10822 (17122619) 650722.45
4188284.03 311.99032 (17011509)
650745.73 4188280.30 287.87142 (17011509) 650735.49
4188223.50 304.75067 (17011509)
650721.52 4188167.62 266.40841 (17121219) 650525.76
4188133.34 324.29716 (17012908)
651125.76 4188133.34 127.20889 (17122619) 649125.76
4188183.34 186.34212 (17021420)
649225.76 4188183.34 209.48657 (17121504) 649325.76
4188183.34 236.86486 (17120517)
649425.76 4188183.34 250.51304 (17123107) 649525.76
4188183.34 287.02305 (14120608)
649625.76 4188183.34 332.79065 (13013108) 649725.76
4188183.34 370.68878 (15122802)
649825.76 4188183.34 418.54326 (17121508) 649925.76
4188183.34 461.84594 (17122918)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
650025.76	4188183.34	561.98266	(17011609)	650125.76	4188183.34	515.02338	(15011509)
650225.76	4188183.34	516.34212	(17122701)	650325.76	4188183.34	456.96489	(17012903)
650425.76	4188183.34	384.13462	(17120120)	650525.76	4188183.34	328.67274	(17012908)
650625.76	4188183.34	303.39139	(17122320)	650725.76	4188183.34	265.87577	(17121219)
650825.76	4188183.34	267.10771	(17011509)	651125.76	4188183.34	135.83148	(17122619)
649125.76	4188233.34	191.93122	(17120203)	649225.76	4188233.34	216.00516	(17021420)
649325.76	4188233.34	244.77048	(17121504)	649425.76	4188233.34	276.59923	(17120517)
649525.76	4188233.34	300.92293	(13012121)	649625.76	4188233.34	349.48033	(13010906)
649725.76	4188233.34	404.73915	(16010309)	649825.76	4188233.34	460.15527	(14021122)
649925.76	4188233.34	532.32626	(17122918)	650025.76	4188233.34	634.12433	(17011609)
650125.76	4188233.34	583.67218	(15011509)	650225.76	4188233.34	566.77545	(17012804)
650325.76	4188233.34	521.82765	(17020801)	650425.76	4188233.34	418.72554	(17012908)
650525.76	4188233.34	328.15450	(17122320)	650625.76	4188233.34	322.48149	(17121219)
650725.76	4188233.34	313.82316	(17011509)	650825.76	4188233.34	250.84233	(17011509)
651125.76	4188233.34	133.62091	(17020824)	649125.76	4188283.34	204.53866	(17021308)
649225.76	4188283.34	218.42647	(17021308)	649325.76	4188283.34	253.84456	(17021420)
649425.76	4188283.34	291.13159	(17121504)	649525.76	4188283.34	325.66914	(17120517)
649625.76	4188283.34	373.70837	(13010908)	649725.76	4188283.34	444.60821	(13013108)
649825.76	4188283.34	509.48521	(15010507)	649925.76	4188283.34	601.54715	(17123007)
650025.76	4188283.34	712.34494	(17011609)	650125.76			

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 4188283.34      688.25586  (17122917)
        650225.76   4188283.34      665.19354  (17122620)                650325.76
 4188283.34      547.79892  (17120120)
        650425.76   4188283.34      452.28846  (17012908)                650525.76
 4188283.34      398.63902  (17122320)
        650625.76   4188283.34      370.54077  (17011509)                650725.76
 4188283.34      308.76709  (17011509)
        650825.76   4188283.34      203.54158  (17122619)                651125.76
 4188283.34      133.21476  (17020824)
        649125.76   4188333.34      201.51223  (17123023)                649225.76
 4188333.34      232.84158  (17021308)
        649325.76   4188333.34      265.43544  (17021308)                649425.76
 4188333.34      303.25549  (17021420)
        649525.76   4188333.34      354.06947  (17121504)                649625.76
 4188333.34      394.62155  (15010907)
        649725.76   4188333.34      475.35924  (13022803)                649825.76
 4188333.34      576.52305  (16010309)
        649925.76   4188333.34      650.74667  (17121508)                650025.76
 4188333.34      793.97258  (17011609)
        650125.76   4188333.34      833.74710  (17122917)                650225.76
 4188333.34      752.26600  (17122920)
        650325.76   4188333.34      572.65747  (17011508)                650425.76
 4188333.34      482.84719  (17122320)
        650525.76   4188333.34      437.83542  (17011509)                650625.76
 4188333.34      389.09170  (17011509)
        650725.76   4188333.34      246.77051  (17122619)                650825.76
 4188333.34      207.67091  (17121906)
        651125.76   4188333.34      137.45499  (17011303)                649125.76
 4188383.34      202.39022  (17012823)
        649225.76   4188383.34      228.49730  (17123023)                649325.76
 4188383.34      264.21511  (17123023)
        649425.76   4188383.34      324.20759  (17021308)                649525.76
 4188383.34      369.55427  (17021420)
        649625.76   4188383.34      443.16373  (17121504)                649725.76
 4188383.34      506.23006  (13012121)
        649825.76   4188383.34      637.14254  (13013108)                649925.76
 4188383.34      765.51231  (13020205)
        650025.76   4188383.34      889.25916  (15012509)                650125.76
 4188383.34     1010.93027  (17122917)
        650225.76   4188383.34      861.11700  (17020801)                650325.76
 4188383.34      670.72093  (17012908)
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*** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION

VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
650425.76	4188383.34	551.92005	(17121219)	650525.76	4188383.34	504.78791	(17011509)
650625.76	4188383.34	306.98483	(17122619)	650725.76	4188383.34	249.66946	(17121906)
650825.76	4188383.34	207.94354	(17020824)	651125.76	4188383.34	141.32209	(17121319)
649125.76	4188433.34	207.31782	(17013105)	649225.76	4188433.34	234.47941	(17013105)
649325.76	4188433.34	269.86058	(17121207)	649425.76	4188433.34	319.16370	(17123023)
649525.76	4188433.34	396.22042	(17021308)	649625.76	4188433.34	464.63160	(17120203)
649725.76	4188433.34	576.46956	(17121504)	649825.76	4188433.34	694.71651	(13010908)
649925.76	4188433.34	902.71064	(16010309)	650025.76	4188433.34	1080.14125	(14021105)
650125.76	4188433.34	1222.58865	(17122917)	650225.76	4188433.34	962.23703	(17011208)
650325.76	4188433.34	753.08155	(17122320)	650425.76	4188433.34	679.52318	(17011509)
650525.76	4188433.34	394.95661	(17122619)	650625.76	4188433.34	310.75715	(17020824)
650725.76	4188433.34	246.69402	(17011303)	650825.76	4188433.34	210.08085	(17011303)
651125.76	4188433.34	141.03658	(17010504)	649125.76	4188483.34	210.84598	(17022506)
649225.76	4188483.34	239.83848	(17022506)	649325.76	4188483.34	273.56116	(17013105)
649425.76	4188483.34	327.01355	(17013105)	649525.76	4188483.34	387.60909	(17121207)
649625.76	4188483.34	479.84522	(17021308)	649725.76	4188483.34	624.09951	(17021308)
650425.76	4188483.34	532.02679	(17122619)	650525.76	4188483.34	393.09119	(17020824)
650625.76	4188483.34	310.49066	(17011303)	650725.76	4188483.34	261.65286	(17121319)
650825.76	4188483.34	216.56204	(17010504)	651125.76			

4188483.34 150.95826 (17122519)
649125.76 4188533.34 210.67191 (17121807) 649225.76
4188533.34 240.94828 (17121807)
649325.76 4188533.34 274.32843 (17121807) 649425.76
4188533.34 332.68063 (17022506)
649525.76 4188533.34 401.24911 (17022506) 649625.76
4188533.34 497.52903 (17013105)
649725.76 4188533.34 626.64530 (17121823) 650425.76
4188533.34 523.54613 (17011303)
650525.76 4188533.34 406.89382 (17121319) 650625.76
4188533.34 323.29328 (17122519)
650725.76 4188533.34 276.84779 (17122519) 650825.76
4188533.34 232.68036 (17122519)
651125.76 4188533.34 146.71894 (17122719) 649125.76
4188583.34 210.25702 (17013008)
649225.76 4188583.34 240.93808 (17013008) 649325.76
4188583.34 278.65031 (17013008)
649425.76 4188583.34 325.52956 (17013008) 649525.76
4188583.34 398.27885 (17121807)
649625.76 4188583.34 504.19482 (17121807) 649725.76
4188583.34 646.89037 (17022506)
650425.76 4188583.34 578.96762 (17122519) 650525.76
4188583.34 425.50839 (17122519)
650625.76 4188583.34 330.95556 (17122719) 650725.76
4188583.34 269.53138 (17122621)
650825.76 4188583.34 226.95621 (17122621) 651125.76
4188583.34 146.61293 (17122621)
649125.76 4188633.34 217.92283 (17011505) 649225.76
4188633.34 249.77207 (17011505)
649325.76 4188633.34 290.37339 (17011505) 649425.76
4188633.34 343.51967 (17011505)
649525.76 4188633.34 415.42205 (17011505) 649625.76
4188633.34 516.89821 (17011505)
649725.76 4188633.34 668.37728 (17011505) 649825.76
4188633.34 912.91931 (17011505)
649925.76 4188633.34 1381.87066 (17121203) 650025.76
4188633.34 0.00000 (00000000)
650125.76 4188633.34 0.00000 (00000000) 650225.76
4188633.34 1474.50166 (14022208)
650325.76 4188633.34 889.49231 (14022208) 650425.76
4188633.34 607.98857 (14022208)
650525.76 4188633.34 447.49740 (14022208) 650625.76
4188633.34 346.10193 (14022208)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***
INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
650725.76	4188633.34	277.42650	(14022208)	650825.76	4188633.34	230.89112	(16010203)
651125.76	4188633.34	148.60837	(16010203)	649125.76	4188683.34	217.76365	(17013107)
649225.76	4188683.34	248.39062	(17013107)	649325.76	4188683.34	285.58549	(17013107)
649425.76	4188683.34	337.84827	(17122903)	649525.76	4188683.34	408.45202	(17011121)
649625.76	4188683.34	516.32742	(17121322)	649725.76	4188683.34	661.99325	(17121322)
649825.76	4188683.34	865.53850	(17122608)	649925.76	4188683.34	1343.27499	(17011201)
650025.76	4188683.34	2033.57207	(17122609)	650125.76	4188683.34	0.00000	(00000000)
650225.76	4188683.34	1372.24398	(14011317)	650325.76	4188683.34	832.95057	(13032807)
650425.76	4188683.34	576.05526	(14021120)	650525.76	4188683.34	437.95751	(14021603)
650625.76	4188683.34	344.59041	(14022208)	650725.76	4188683.34	288.87186	(14022208)
650825.76	4188683.34	245.39819	(14022208)	651125.76	4188683.34	160.92073	(14022208)
649125.76	4188733.34	213.05978	(17121322)	649225.76	4188733.34	247.46656	(17121322)
649325.76	4188733.34	285.74027	(17121322)	649425.76	4188733.34	326.11442	(17120702)
649525.76	4188733.34	383.08514	(17120702)	649625.76	4188733.34	477.64936	(17122608)
649725.76	4188733.34	625.67640	(17011201)	649825.76	4188733.34	862.18089	(17121007)
649925.76	4188733.34	1082.94899	(17121402)	650025.76	4188733.34	1490.57642	(17122724)
650125.76	4188733.34	1864.03378	(17022508)	650225.76	4188733.34	1159.01668	(17121119)
650325.76	4188733.34	784.58029	(13020908)	650425.76			

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 4188733.34      562.83891  (15010317)
        650525.76   4188733.34      426.45737  (13032807)                650625.76
 4188733.34      338.09532  (14010519)
        650725.76   4188733.34      272.36131  (14021120)                650825.76
 4188733.34      231.17229  (15122424)
        651125.76   4188733.34      148.61503  (15020206)                649125.76
 4188783.34      207.59241  (17120702)
        649225.76   4188783.34      232.06341  (17120702)                649325.76
 4188783.34      249.71285  (17120702)
        649425.76   4188783.34      313.53469  (17122608)                649525.76
 4188783.34      376.96889  (17122608)
        649625.76   4188783.34      489.09928  (17011201)                649725.76
 4188783.34      616.72941  (17121007)
        649825.76   4188783.34      711.65535  (17121402)                649925.76
 4188783.34      854.82630  (17123024)
        650025.76   4188783.34     1203.14556  (17120219)                650125.76
 4188783.34     1282.26247  (17012905)
        650225.76   4188783.34     1013.31554  (17122321)                650325.76
 4188783.34      759.15994  (17121119)
        650425.76   4188783.34      528.15212  (13020908)                650525.76
 4188783.34      412.03886  (14011317)
        650625.76   4188783.34      330.19963  (13020204)                650725.76
 4188783.34      272.16670  (15122617)
        650825.76   4188783.34      226.91926  (14010519)                651125.76
 4188783.34      148.91750  (15122424)
        649125.76   4188833.34      186.08432  (17122608)                649225.76
 4188833.34      226.30160  (17122608)
        649325.76   4188833.34      261.56876  (17122608)                649425.76
 4188833.34      320.02301  (17011201)
        649525.76   4188833.34      380.37048  (17120707)                649625.76
 4188833.34      473.04864  (17020404)
        649725.76   4188833.34      514.92046  (17121402)                649825.76
 4188833.34      561.91812  (17120208)
        649925.76   4188833.34      773.09694  (17122909)                650025.76
 4188833.34      934.44631  (17012717)
        650125.76   4188833.34     1010.79662  (17012905)                650225.76
 4188833.34      870.71200  (17022706)
        650325.76   4188833.34      681.91429  (17022407)                650425.76
 4188833.34      522.23751  (17121119)
        650525.76   4188833.34      391.01512  (14022307)                650625.76
 4188833.34      323.90006  (14011317)
        650725.76   4188833.34      266.40132  (15010317)                650825.76
 4188833.34      223.60913  (13020204)
        651125.76   4188833.34      148.00385  (14010519)                649125.76
 4188883.34      195.36552  (17122608)
↑ *** AERMOD - VERSION  19191 ***   *** C:\Users\Smith\Dropbox\My PC
(DESKTOP-977GSBU)\Documents\HRA\Ashley  ***        10/26/23
 *** AERMET - VERSION  18081 ***   ***
                            ***        16:20:52
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*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL5 ***

INCLUDING SOURCE(S): VOL5 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
649225.76	4188883.34	224.69546	(17011201)	649325.76	4188883.34	270.33729	(17011201)
649425.76	4188883.34	312.23308	(17121007)	649525.76	4188883.34	375.96787	(17020404)
649625.76	4188883.34	395.41013	(17121402)	649725.76	4188883.34	407.08480	(17120624)
649825.76	4188883.34	495.82258	(17123024)	649925.76	4188883.34	635.70017	(17122724)
650025.76	4188883.34	808.89270	(17012717)	650125.76	4188883.34	796.17863	(17012905)
650225.76	4188883.34	726.30199	(17021405)	650325.76	4188883.34	607.22837	(17122321)
650425.76	4188883.34	468.43653	(17123020)	650525.76	4188883.34	374.52028	(17121119)
650625.76	4188883.34	304.99169	(14022307)	650725.76	4188883.34	258.75361	(14011317)
650825.76	4188883.34	216.76870	(13121420)	651125.76	4188883.34	147.14682	(15122617)
650125.76	4188933.34	631.89562	(17012720)	650225.76	4188933.34	639.32625	(17022508)
650325.76	4188933.34	551.01878	(17012601)	650425.76	4188933.34	452.95579	(17022407)
650525.76	4188933.34	372.32212	(17123020)	650625.76	4188933.34	290.54674	(14012706)
650725.76	4188933.34	246.38008	(14022307)	650825.76	4188933.34	211.98151	(13020908)
651125.76	4188933.34	144.70091	(15010317)	650425.76	4188983.34	410.64467	(17122321)
650525.76	4188983.34	342.83436	(17022407)	650625.76	4188983.34	301.41469	(17121119)
650725.76	4188983.34	235.46217	(13121617)	650825.76	4188983.34	204.36086	(14022307)
651125.76	4188983.34	139.78796	(13121420)	650525.76			

4189033.34 322.81754 (17022407)
650625.76 4189033.34 269.07678 (17123020) 650725.76
4189033.34 246.80437 (17121119)
650825.76 4189033.34 197.75552 (17120617) 651125.76
4189033.34 138.84812 (14011317)
650525.76 4189083.34 298.97338 (17122321) 650625.76
4189083.34 271.26036 (17022407)
650725.76 4189083.34 234.18516 (17123020) 650825.76
4189083.34 202.96646 (17121119)
651125.76 4189083.34 134.29701 (13020908) 650525.76
4189133.34 286.71783 (17122321)
650625.76 4189133.34 241.86934 (17022407) 650725.76
4189133.34 206.24419 (17120122)
650825.76 4189133.34 197.89248 (17123020) 651125.76
4189133.34 129.99596 (14022307)
650781.98 4189510.65 152.12241 (17012601) 650760.33
4189397.50 168.98267 (17122321)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -

649676.34 4188314.55 526.86595 (17121823) 649629.66
4188294.84 470.16256 (17123023)
649810.15 4188312.48 762.30349 (17021308) 649364.10
4188360.20 292.42020 (17121807)
649327.80 4188355.01 275.96379 (17121807) 649380.70
4188758.52 277.45517 (17020404)
650495.81 4188841.51 324.01888 (17122321) 650597.47
4188832.17 279.93156 (17022407)
650536.27 4188878.85 289.32376 (17022408) 650577.76
4188877.81 283.05301 (17022407)
650602.66 4188860.18 286.66111 (17022407) 650610.95

4188880.93 279.33655 (17022407)
650638.10 4188858.53 248.75061 (17022407) 650664.10
4188331.03 296.90426 (17122519)
650668.72 4188350.83 311.35862 (17122519) 650677.96
4188379.86 296.90356 (17122719)
650699.74 4188414.84 285.25345 (17122621) 650758.47
4188658.36 244.78276 (13121420)
650765.73 4188678.82 242.55653 (14011317) 650773.65
4188706.54 235.06706 (14011317)
650778.27 4188726.34 230.13312 (13020908) 650805.33
4188805.53 208.91643 (13121617)
650806.65 4188824.01 204.38417 (13121617) 650811.27
4188843.81 200.56815 (14012706)
650814.57 4188862.29 201.74745 (17121119) 650846.24
4188924.98 197.11167 (17121119)
650850.86 4188951.38 189.90645 (17123020) 650854.82
4188976.46 185.21662 (17123020)
650698.00 4188307.32 272.97817 (17121319) 650692.60
4188291.80 277.35826 (17121319)
650724.82 4189245.80 168.56898 (17012601) 650726.07
4189273.37 160.39338 (17012601)
650856.27 4189006.30 169.42117 (17123020) 650857.23
4189022.60 159.83821 (13121217)
650859.15 4189041.29 162.89900 (17120122) 650859.15
4189058.54 168.88945 (17022407)
650860.58 4189076.28 171.78757 (17022407) 650861.54
4189094.49 171.58515 (17022407)
650857.71 4189113.19 167.95391 (17022407) 650847.16
4189118.94 164.74999 (17022407)
650848.12 4189134.76 156.41918 (17022407) 650850.04
4189155.37 152.46079 (17120205)
650851.48 4189171.66 150.00396 (17120205) 650853.87
4189184.12 146.85043 (17120205)
650856.75 4189199.46 147.39241 (17022408) 650857.71
4189213.36 147.13362 (17022408)
650860.58 4189226.30 145.49285 (17022408) 650862.50
4189242.60 145.62114 (17122321)
650865.38 4189258.42 146.35361 (17122321) 650867.77
4189275.19 146.08223 (17122321)
650868.73 4189291.49 144.72588 (17122321) 650872.09
4189309.23 141.64798 (17122321)
650874.00 4189325.04 137.94240 (17122321) 650875.92
4189340.38 133.50417 (17122321)
650878.80 4189355.24 128.76234 (17122321) 650881.19
4189373.45 125.59213 (17012601)
650884.55 4189390.71 126.77829 (17012601) 650888.86
4189407.01 126.86617 (17012601)
650889.82 4189427.14 127.17222 (17012601) 650891.74
4189443.43 126.19896 (17012601)
650895.09 4189461.17 124.23844 (17012601) 650898.45

4189475.55 122.18737 (17012601)
650898.45 4189489.93 119.63153 (17012601) 650902.28
4189504.31 116.89380 (17012601)
650709.41 4188344.56 286.89985 (17122519) 650722.45
4188284.03 261.50509 (17121319)
650745.73 4188280.30 250.87863 (17121319) 650735.49
4188223.50 242.29059 (17020824)
650721.52 4188167.62 254.39198 (17122619) 650525.76
4188133.34 416.65305 (17121219)
651125.76 4188133.34 136.99285 (17011303) 649125.76
4188183.34 198.42041 (17121207)
649225.76 4188183.34 224.55561 (17123023) 649325.76
4188183.34 257.43884 (17123023)
649425.76 4188183.34 315.85826 (17021308) 649525.76
4188183.34 358.81862 (17021420)
649625.76 4188183.34 428.10957 (17121504) 649725.76
4188183.34 486.23950 (13012121)
649825.76 4188183.34 606.66705 (13013108) 649925.76
4188183.34 728.35215 (13012423)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -
650025.76 4188183.34 841.77618 (13012120) 650125.76
4188183.34 950.78098 (17122917)
650225.76 4188183.34 844.93427 (17012903) 650325.76
4188183.34 667.14444 (17012908)
650425.76 4188183.34 537.39668 (17121219) 650525.76
4188183.34 507.40504 (17011509)
650625.76 4188183.34 305.49204 (17011509) 650725.76
4188183.34 250.30357 (17121906)
650825.76 4188183.34 210.17077 (17020824) 651125.76

4188183.34 140.35365 (17121319)
649125.76 4188233.34 203.83217 (17013105) 649225.76
4188233.34 228.84309 (17013105)
649325.76 4188233.34 263.96179 (17121207) 649425.76
4188233.34 311.07759 (17123023)
649525.76 4188233.34 385.27152 (17021308) 649625.76
4188233.34 448.28934 (17120203)
649725.76 4188233.34 552.78117 (17121504) 649825.76
4188233.34 662.54462 (15011205)
649925.76 4188233.34 861.66321 (16010309) 650025.76
4188233.34 1021.53790 (14021105)
650125.76 4188233.34 1170.61312 (17122917) 650225.76
4188233.34 948.89029 (17020801)
650325.76 4188233.34 722.86618 (17122320) 650425.76
4188233.34 672.54481 (17011509)
650525.76 4188233.34 404.17581 (17011509) 650625.76
4188233.34 307.45727 (17121906)
650725.76 4188233.34 241.74764 (17011303) 650825.76
4188233.34 211.20903 (17011303)
651125.76 4188233.34 140.96090 (17010504) 649125.76
4188283.34 207.23062 (17022506)
649225.76 4188283.34 234.09424 (17022506) 649325.76
4188283.34 268.54101 (17013105)
649425.76 4188283.34 317.57992 (17013105) 649525.76
4188283.34 375.91880 (17121207)
649625.76 4188283.34 466.48770 (17021308) 649725.76
4188283.34 596.81140 (17021308)
649825.76 4188283.34 751.62591 (17121504) 649925.76
4188283.34 956.55072 (13013108)
650025.76 4188283.34 1269.65157 (13011517) 650125.76
4188283.34 1441.37882 (17122917)
650225.76 4188283.34 1085.84827 (17012908) 650325.76
4188283.34 928.21026 (17011509)
650425.76 4188283.34 564.23882 (17011509) 650525.76
4188283.34 394.61264 (17020824)
650625.76 4188283.34 309.95917 (17011303) 650725.76
4188283.34 259.90068 (17121319)
650825.76 4188283.34 214.84897 (17010504) 651125.76
4188283.34 150.63254 (17122519)
649125.76 4188333.34 206.99832 (17121807) 649225.76
4188333.34 235.33363 (17121807)
649325.76 4188333.34 266.95497 (17022506) 649425.76
4188333.34 324.90033 (17022506)
649525.76 4188333.34 387.30968 (17022506) 649625.76
4188333.34 479.71563 (17011605)
649725.76 4188333.34 601.77431 (17121823) 649825.76
4188333.34 855.04920 (17021308)
649925.76 4188333.34 1106.86532 (17121504) 650025.76
4188333.34 1612.72680 (16010309)
650125.76 4188333.34 1803.50298 (17122318) 650225.76

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 4188333.34     1356.36485  (17011509)
        650325.76   4188333.34      853.50283  (17011509)                  650425.76
 4188333.34      515.32563  (17011303)
        650525.76   4188333.34      404.55303  (17121319)                  650625.76
 4188333.34      317.02310  (17010504)
        650725.76   4188333.34      274.07223  (17122519)                  650825.76
 4188333.34      232.89797  (17122519)
        651125.76   4188333.34      147.25737  (17122719)                  649125.76
 4188383.34      206.40754  (17013008)
        649225.76   4188383.34      235.43193  (17013008)                  649325.76
 4188383.34      270.74835  (17013008)
        649425.76   4188383.34      314.11709  (17013008)                  649525.76
 4188383.34      388.85406  (17121807)
        649625.76   4188383.34      486.07474  (17121807)                  649725.76
 4188383.34      623.60905  (17022506)
        649825.76   4188383.34      844.01210  (17011605)                  649925.76
 4188383.34     1274.18779  (17021308)
        650025.76   4188383.34     1977.18736  (16122205)                  650125.76
 4188383.34        0.00000  (00000000)
        650225.76   4188383.34     1470.47430  (17011509)                  650325.76
 4188383.34      765.39172  (17121319)
↑ *** AERMOD - VERSION  19191 ***   *** C:\Users\Smith\Dropbox\My PC
(DESKTOP-977GSBU)\Documents\HRA\Ashley  ***        10/26/23
 *** AERMET - VERSION  18081 ***   ***
                           ***        16:20:52

                                      PAGE  69
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  RURAL  ADJ_U*

                                *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  VOL6     ***
                                   INCLUDING SOURCE(S):     VOL6         ,

                                            *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                        ** CONC OF OTHER    IN MICROGRAMS/M**3
                    **

     X-COORD (M)  Y-COORD (M)        CONC      (YYMMDDHH)              X-COORD (M)
Y-COORD (M)        CONC      (YYMMDDHH)
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - -
        650425.76   4188383.34      573.51491  (17122519)                  650525.76
 4188383.34      429.47318  (17122519)
        650625.76   4188383.34      331.89759  (17122719)                  650725.76
 4188383.34      267.15935  (17122621)
        650825.76   4188383.34      225.91751  (17122621)                  651125.76
 4188383.34      147.05378  (17122621)
        649125.76   4188433.34      214.00654  (17011505)                  649225.76
```

4188433.34 244.76610 (17011505)
649325.76 4188433.34 283.81717 (17011505) 649425.76
4188433.34 334.67637 (17011505)
649525.76 4188433.34 403.05265 (17011505) 649625.76
4188433.34 498.78639 (17011505)
649725.76 4188433.34 640.23454 (17011505) 649825.76
4188433.34 865.54999 (17011505)
649925.76 4188433.34 1278.96585 (17121203) 650025.76
4188433.34 0.00000 (00000000)
650125.76 4188433.34 0.00000 (00000000) 650225.76
4188433.34 1461.06746 (14022208)
650325.76 4188433.34 876.11949 (14022208) 650425.76
4188433.34 598.17962 (14022208)
650525.76 4188433.34 440.33685 (14022208) 650625.76
4188433.34 340.71614 (14022208)
650725.76 4188433.34 275.44822 (16010203) 650825.76
4188433.34 229.63341 (16010203)
651125.76 4188433.34 147.93883 (16010203) 649125.76
4188483.34 213.79986 (17013107)
649225.76 4188483.34 244.10735 (17013107) 649325.76
4188483.34 281.10577 (17013107)
649425.76 4188483.34 327.03997 (17122903) 649525.76
4188483.34 396.18174 (17122903)
649625.76 4188483.34 495.42906 (17121322) 649725.76
4188483.34 640.30371 (17121322)
650425.76 4188483.34 575.24934 (14021120) 650525.76
4188483.34 436.91926 (14021603)
650625.76 4188483.34 349.79611 (14022208) 650725.76
4188483.34 291.73079 (14022208)
650825.76 4188483.34 246.94487 (14022208) 651125.76
4188483.34 160.96939 (14022208)
649125.76 4188533.34 208.61716 (17011121) 649225.76
4188533.34 241.96151 (17121322)
649325.76 4188533.34 280.88550 (17121322) 649425.76
4188533.34 322.86971 (17121322)
649525.76 4188533.34 376.37568 (17120702) 649625.76
4188533.34 455.46872 (17122608)
649725.76 4188533.34 600.41951 (17122608) 650425.76
4188533.34 561.52024 (15010317)
650525.76 4188533.34 426.87180 (13032807) 650625.76
4188533.34 337.70112 (14010519)
650725.76 4188533.34 272.94871 (15122424) 650825.76
4188533.34 231.12902 (14021603)
651125.76 4188533.34 149.16314 (15020206) 649125.76
4188583.34 203.53378 (17120702)
649225.76 4188583.34 229.65710 (17120702) 649325.76
4188583.34 250.55551 (17120702)
649425.76 4188583.34 303.10551 (17122608) 649525.76
4188583.34 370.71586 (17122608)
649625.76 4188583.34 473.71656 (17011201) 649725.76

4188583.34 597.12480 (17121007)
650425.76 4188583.34 529.46395 (13020908) 650525.76
4188583.34 412.03136 (14011317)
650625.76 4188583.34 330.05703 (13020204) 650725.76
4188583.34 271.58526 (15122617)
650825.76 4188583.34 227.70220 (14010519) 651125.76
4188583.34 149.29533 (15122424)
649125.76 4188633.34 179.83055 (17122608) 649225.76
4188633.34 220.55856 (17122608)
649325.76 4188633.34 258.27698 (17122608) 649425.76
4188633.34 308.78941 (17011201)
649525.76 4188633.34 370.16298 (17011201) 649625.76
4188633.34 455.50306 (17020404)
649725.76 4188633.34 515.81714 (17121402) 649825.76
4188633.34 549.63547 (17120208)
649925.76 4188633.34 758.65203 (17122909) 650025.76
4188633.34 907.72941 (17120219)
650125.76 4188633.34 982.89138 (17012905) 650225.76
4188633.34 867.38804 (17021405)
650325.76 4188633.34 678.79483 (17022407) 650425.76
4188633.34 523.01925 (17121119)
650525.76 4188633.34 390.89641 (14022307) 650625.76
4188633.34 324.52741 (14011317)

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -
650725.76 4188633.34 266.92721 (15010317) 650825.76
4188633.34 223.41009 (13020204)
651125.76 4188633.34 148.21702 (14010519) 649125.76
4188683.34 193.40198 (17122608)
649225.76 4188683.34 216.70423 (17011201) 649325.76

4188683.34 265.50116 (17011201)
649425.76 4188683.34 304.01098 (17120707) 649525.76
4188683.34 366.41044 (17020404)
649625.76 4188683.34 396.27195 (17121402) 649725.76
4188683.34 402.67386 (17120624)
649825.76 4188683.34 495.21863 (17123024) 649925.76
4188683.34 605.99860 (17122724)
650025.76 4188683.34 770.22762 (17012717) 650125.76
4188683.34 768.78976 (17012720)
650225.76 4188683.34 706.98196 (17021405) 650325.76
4188683.34 606.53917 (17122321)
650425.76 4188683.34 465.01653 (17123020) 650525.76
4188683.34 376.34366 (17121119)
650625.76 4188683.34 305.16406 (14022307) 650725.76
4188683.34 259.67068 (14011317)
650825.76 4188683.34 217.02221 (13121420) 651125.76
4188683.34 147.13803 (15122617)
649125.76 4188733.34 197.69945 (17011201) 649225.76
4188733.34 223.09835 (17011201)
649325.76 4188733.34 258.98318 (17121007) 649425.76
4188733.34 301.81067 (17020404)
649525.76 4188733.34 317.06278 (17121402) 649625.76
4188733.34 320.06106 (17043004)
649725.76 4188733.34 363.56965 (17123024) 649825.76
4188733.34 471.97604 (17122909)
649925.76 4188733.34 541.07092 (17022607) 650025.76
4188733.34 670.19583 (17012717)
650125.76 4188733.34 656.83632 (17012720) 650225.76
4188733.34 651.90352 (17022508)
650325.76 4188733.34 547.20208 (17012601) 650425.76
4188733.34 449.71664 (17022407)
650525.76 4188733.34 371.39820 (17123020) 650625.76
4188733.34 290.91007 (14012706)
650725.76 4188733.34 246.67174 (14022307) 650825.76
4188733.34 212.26793 (13020908)
651125.76 4188733.34 144.61731 (15010317) 649125.76
4188783.34 195.33214 (17120707)
649225.76 4188783.34 223.62672 (17121007) 649325.76
4188783.34 253.42419 (17020404)
649425.76 4188783.34 261.36521 (17121402) 649525.76
4188783.34 272.55548 (17043004)
649625.76 4188783.34 288.29061 (17120208) 649725.76
4188783.34 333.00120 (17123024)
649825.76 4188783.34 401.94083 (16022108) 649925.76
4188783.34 494.13844 (17022607)
650025.76 4188783.34 573.75783 (17012717) 650125.76
4188783.34 569.56879 (17012720)
650225.76 4188783.34 575.65731 (17022508) 650325.76
4188783.34 477.27425 (17021405)
650425.76 4188783.34 412.69484 (17122321) 650525.76

4188783.34 344.86213 (17022407)
650625.76 4188783.34 301.30249 (17121119) 650725.76
4188783.34 235.90432 (13121617)
650825.76 4188783.34 204.68994 (14022307) 651125.76
4188783.34 139.97524 (13121420)
649125.76 4188833.34 193.84835 (17121007) 649225.76
4188833.34 216.21609 (17020404)
649325.76 4188833.34 220.37696 (17121402) 649425.76
4188833.34 234.26359 (17043004)
649525.76 4188833.34 232.04901 (17121808) 649625.76
4188833.34 274.24422 (17123024)
649725.76 4188833.34 325.10812 (17122909) 649825.76
4188833.34 357.49278 (17122724)
649925.76 4188833.34 453.96589 (17120219) 650025.76
4188833.34 486.59003 (17012717)
650125.76 4188833.34 499.80939 (17012720) 650225.76
4188833.34 476.74931 (17022508)
650325.76 4188833.34 438.84845 (17021405) 650425.76
4188833.34 379.49178 (17012601)
650525.76 4188833.34 320.27666 (17022407) 650625.76
4188833.34 267.75352 (17123020)
650725.76 4188833.34 247.18210 (17121119) 650825.76
4188833.34 198.04002 (13121617)
651125.76 4188833.34 139.25659 (14011317) 649125.76
4188883.34 186.91107 (17020404)

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: VOL6 ***
INCLUDING SOURCE(S): VOL6 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- -

649225.76 4188883.34 189.77062 (17120905) 649325.76
4188883.34 203.21025 (17043004)
649425.76 4188883.34 198.24934 (17120624) 649525.76

4188883.34   214.63406 (15022507)
649625.76   4188883.34   244.74820 (14121304)   649725.76
4188883.34   302.52844 (17122909)
649825.76   4188883.34   332.71510 (17122724)   649925.76
4188883.34   389.84689 (17120219)
650025.76   4188883.34   410.67993 (17012717)   650125.76
4188883.34   442.95268 (17012720)
650225.76   4188883.34   420.92102 (17121401)   650325.76
4188883.34   367.28798 (17121904)
650425.76   4188883.34   344.59814 (17012601)   650525.76
4188883.34   301.56097 (17122321)
650625.76   4188883.34   271.72961 (17022407)   650725.76
4188883.34   233.72947 (17123020)
650825.76   4188883.34   203.58910 (17121119)   651125.76
4188883.34   134.67486 (13020908)
650125.76   4188933.34   395.88143 (17012720)   650225.76
4188933.34   368.76741 (17121401)
650325.76   4188933.34   334.40930 (17122223)   650425.76
4188933.34   312.35474 (17022706)
650525.76   4188933.34   284.37744 (17122321)   650625.76
4188933.34   240.90445 (14011617)
650725.76   4188933.34   208.29922 (17022407)   650825.76
4188933.34   198.07434 (17123020)
651125.76   4188933.34   130.28706 (14022307)   650425.76
4188983.34   302.15306 (17021405)
650525.76   4188983.34   272.88982 (17012601)   650625.76
4188983.34   231.37701 (17122321)
650725.76   4188983.34   217.93598 (17022407)   650825.76
4188983.34   178.73908 (17123020)
651125.76   4188983.34   129.28059 (17120617)   650525.76
4189033.34   247.15412 (17022706)
650625.76   4189033.34   228.64724 (17122321)   650725.76
4189033.34   192.15187 (14011617)
650825.76   4189033.34   179.65832 (17022407)   651125.76
4189033.34   124.87241 (14012706)
650525.76   4189083.34   225.61242 (17022324)   650625.76
4189083.34   213.66207 (17012601)
650725.76   4189083.34   186.31971 (17022408)   650825.76
4189083.34   177.85018 (17022407)
651125.76   4189083.34   131.85465 (17121119)   650525.76
4189133.34   222.29738 (17021405)
650625.76   4189133.34   203.32459 (17012601)   650725.76
4189133.34   187.67087 (17122321)
650825.76   4189133.34   158.77302 (17120205)   651125.76
4189133.34   127.31014 (17123020)
650781.98   4189510.65   121.51151 (17021405)   650760.33
4189397.50   137.16399 (17022706)

*** 16:20:52

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE SUMMARY OF MAXIMUM PERIOD (43824 HRS) RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

```
                          NETWORK
GROUP ID                     AVERAGE CONC                RECEPTOR  (XR, YR,
ZELEV, ZHILL, ZFLAG)  OF TYPE  GRID-ID
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - -

VOL1       1ST HIGHEST VALUE IS     118.70330 AT (  650325.76,  4188383.34,
10.06,     10.06,     0.00)  DC
           2ND HIGHEST VALUE IS      85.81087 AT (  650425.76,  4188333.34,
10.06,     10.06,     0.00)  DC
           3RD HIGHEST VALUE IS      72.28796 AT (  650525.76,  4188433.34,
10.06,     10.06,     0.00)  DC
           4TH HIGHEST VALUE IS      68.99120 AT (  650525.76,  4188383.34,
10.06,     10.06,     0.00)  DC
           5TH HIGHEST VALUE IS      64.20726 AT (  650425.76,  4188533.34,
10.06,     10.06,     0.00)  DC
           6TH HIGHEST VALUE IS      55.04523 AT (  650325.76,  4188333.34,
10.06,     10.06,     0.00)  DC
           7TH HIGHEST VALUE IS      53.52462 AT (  650525.76,  4188483.34,
10.06,     10.06,     0.00)  DC
           8TH HIGHEST VALUE IS      51.60304 AT (  650525.76,  4188333.34,
10.06,     10.06,     0.00)  DC
           9TH HIGHEST VALUE IS      44.15056 AT (  650225.76,  4188433.34,
10.06,     10.06,     0.00)  DC
          10TH HIGHEST VALUE IS      42.08194 AT (  650425.76,  4188283.34,
10.06,     10.06,     0.00)  DC

VOL2       1ST HIGHEST VALUE IS     130.57562 AT (  649725.76,  4188483.34,
10.06,     10.06,     0.00)  DC
           2ND HIGHEST VALUE IS     115.66569 AT (  649825.76,  4188333.34,
10.06,     10.06,     0.00)  DC
           3RD HIGHEST VALUE IS      79.34923 AT (  649810.15,  4188312.48,
10.06,     10.06,     0.00)  DC
           4TH HIGHEST VALUE IS      75.69188 AT (  649925.76,  4188383.34,
10.06,     10.06,     0.00)  DC
           5TH HIGHEST VALUE IS      71.42414 AT (  649925.76,  4188433.34,
10.06,     10.06,     0.00)  DC
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             6TH HIGHEST VALUE IS      66.40581 AT (  649725.76,  4188333.34,
10.06,       10.06,     0.00)  DC
             7TH HIGHEST VALUE IS      59.35489 AT (  649925.76,  4188333.34,
10.06,       10.06,     0.00)  DC
             8TH HIGHEST VALUE IS      57.93812 AT (  649725.76,  4188533.34,
10.06,       10.06,     0.00)  DC
             9TH HIGHEST VALUE IS      51.39279 AT (  649825.76,  4188283.34,
10.06,       10.06,     0.00)  DC
            10TH HIGHEST VALUE IS      43.87140 AT (  649625.76,  4188433.34,
10.06,       10.06,     0.00)  DC

VOL3         1ST HIGHEST VALUE IS     134.57865 AT (  649725.76,  4188683.34,
10.06,       10.06,     0.00)  DC
             2ND HIGHEST VALUE IS      72.15382 AT (  649925.76,  4188633.34,
10.06,       10.06,     0.00)  DC
             3RD HIGHEST VALUE IS      64.67384 AT (  649725.76,  4188533.34,
10.06,       10.06,     0.00)  DC
             4TH HIGHEST VALUE IS      59.89342 AT (  649725.76,  4188733.34,
10.06,       10.06,     0.00)  DC
             5TH HIGHEST VALUE IS      49.40382 AT (  649825.76,  4188733.34,
10.06,       10.06,     0.00)  DC
             6TH HIGHEST VALUE IS      48.35776 AT (  649925.76,  4188683.34,
10.06,       10.06,     0.00)  DC
             7TH HIGHEST VALUE IS      43.76064 AT (  649625.76,  4188633.34,
10.06,       10.06,     0.00)  DC
             8TH HIGHEST VALUE IS      41.34569 AT (  649625.76,  4188683.34,
10.06,       10.06,     0.00)  DC
             9TH HIGHEST VALUE IS      36.17104 AT (  649625.76,  4188583.34,
10.06,       10.06,     0.00)  DC
            10TH HIGHEST VALUE IS      35.49091 AT (  649725.76,  4188483.34,
10.06,       10.06,     0.00)  DC

VOL4         1ST HIGHEST VALUE IS     101.22201 AT (  650425.76,  4188533.34,
10.06,       10.06,     0.00)  DC
             2ND HIGHEST VALUE IS      71.15977 AT (  650525.76,  4188583.34,
10.06,       10.06,     0.00)  DC
             3RD HIGHEST VALUE IS      70.39500 AT (  650525.76,  4188633.34,
10.06,       10.06,     0.00)  DC
             4TH HIGHEST VALUE IS      66.12417 AT (  650325.76,  4188733.34,
10.06,       10.06,     0.00)  DC
             5TH HIGHEST VALUE IS      54.95206 AT (  650525.76,  4188533.34,
10.06,       10.06,     0.00)  DC
             6TH HIGHEST VALUE IS      54.34743 AT (  650425.76,  4188733.34,
10.06,       10.06,     0.00)  DC
             7TH HIGHEST VALUE IS      49.34341 AT (  650525.76,  4188683.34,
10.06,       10.06,     0.00)  DC
             8TH HIGHEST VALUE IS      47.22930 AT (  650425.76,  4188483.34,
10.06,       10.06,     0.00)  DC
             9TH HIGHEST VALUE IS      45.22354 AT (  650225.76,  4188633.34,
10.06,       10.06,     0.00)  DC
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10TH HIGHEST VALUE IS 43.67173 AT (650225.76, 4188683.34, 10.06, 10.06, 0.00) DC

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE SUMMARY OF MAXIMUM PERIOD (43824 HRS) RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID		NETWORK AVERAGE CONC		RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	GRID-ID
VOL5	1ST HIGHEST VALUE IS	124.25671	AT	(650025.76, 4188683.34, 10.06, 10.06, 0.00)	DC	
	2ND HIGHEST VALUE IS	78.16567	AT	(650225.76, 4188633.34, 10.06, 10.06, 0.00)	DC	
	3RD HIGHEST VALUE IS	58.25919	AT	(650025.76, 4188733.34, 10.06, 10.06, 0.00)	DC	
	4TH HIGHEST VALUE IS	51.13420	AT	(650225.76, 4188683.34, 10.06, 10.06, 0.00)	DC	
	5TH HIGHEST VALUE IS	50.67916	AT	(650125.76, 4188733.34, 10.06, 10.06, 0.00)	DC	
	6TH HIGHEST VALUE IS	40.97062	AT	(649925.76, 4188633.34, 10.06, 10.06, 0.00)	DC	
	7TH HIGHEST VALUE IS	38.89260	AT	(649925.76, 4188683.34, 10.06, 10.06, 0.00)	DC	
	8TH HIGHEST VALUE IS	30.92790	AT	(649925.76, 4188733.34, 10.06, 10.06, 0.00)	DC	
	9TH HIGHEST VALUE IS	29.69502	AT	(650025.76, 4188783.34, 10.06, 10.06, 0.00)	DC	
	10TH HIGHEST VALUE IS	29.42868	AT	(650325.76, 4188633.34, 10.06, 10.06, 0.00)	DC	
VOL6	1ST HIGHEST VALUE IS	108.73379	AT	(650125.76, 4188333.34, 10.06, 10.06, 0.00)	DC	
	2ND HIGHEST VALUE IS	108.48266	AT	(650025.76, 4188383.34, 10.06, 10.06, 0.00)	DC	
	3RD HIGHEST VALUE IS	87.15591	AT	(650225.76, 4188433.34,		

10.06,   10.06,   0.00) DC
4TH HIGHEST VALUE IS   86.87975 AT (650225.76, 4188383.34,
10.06,   10.06,   0.00) DC
5TH HIGHEST VALUE IS   63.13272 AT (650225.76, 4188333.34,
10.06,   10.06,   0.00) DC
6TH HIGHEST VALUE IS   55.25253 AT (650025.76, 4188333.34,
10.06,   10.06,   0.00) DC
7TH HIGHEST VALUE IS   47.87228 AT (650125.76, 4188283.34,
10.06,   10.06,   0.00) DC
8TH HIGHEST VALUE IS   40.97819 AT (650225.76, 4188283.34,
10.06,   10.06,   0.00) DC
9TH HIGHEST VALUE IS   38.21987 AT (649925.76, 4188433.34,
10.06,   10.06,   0.00) DC
10TH HIGHEST VALUE IS   33.04575 AT (650325.76, 4188383.34,
10.06,   10.06,   0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** MODELOPTs: NonDFAULT CONC FLAT RURAL ADJ_U*

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF OTHER   IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID

- -

VOL1   HIGH   1ST HIGH VALUE IS   2312.52925 ON 16010309: AT (650325.76,
4188383.34,   10.06,   10.06,   0.00) DC

VOL2   HIGH   1ST HIGH VALUE IS   2142.77393 ON 17122909: AT (649725.76,
4188483.34,   10.06,   10.06,   0.00) DC

VOL3   HIGH   1ST HIGH VALUE IS   2142.89174 ON 17122909: AT (649725.76,

```
4188683.34,    10.06,    10.06,    0.00)  DC

VOL4      HIGH   1ST HIGH VALUE IS    1815.22842  ON 17022508: AT (  650425.76,
4188733.34,    10.06,    10.06,    0.00)  DC

VOL5      HIGH   1ST HIGH VALUE IS    2033.57207  ON 17122609: AT (  650025.76,
4188683.34,    10.06,    10.06,    0.00)  DC

VOL6      HIGH   1ST HIGH VALUE IS    1977.18736  ON 16122205: AT (  650025.76,
4188383.34,    10.06,    10.06,    0.00)  DC


 *** RECEPTOR TYPES:  GC = GRIDCART
                      GP = GRIDPOLR
                      DC = DISCCART
                      DP = DISCPOLR
↑ *** AERMOD - VERSION  19191 ***   *** C:\Users\Smith\Dropbox\My PC
(DESKTOP-977GSBU)\Documents\HRA\Ashley  ***        10/26/23
 *** AERMET - VERSION  18081 ***   ***
                        ***        16:20:52

                                   PAGE  75
 *** MODELOPTs:    NonDFAULT  CONC  FLAT  RURAL  ADJ_U*

 *** Message Summary : AERMOD Model Execution ***

  --------- Summary of Total Messages --------

 A Total of           0 Fatal Error Message(s)
 A Total of          17 Warning Message(s)
 A Total of         971 Informational Message(s)

 A Total of       43824 Hours Were Processed

 A Total of         442 Calm Hours Identified

 A Total of         529 Missing Hours Identified (  1.21 Percent)


   ******** FATAL ERROR MESSAGES ********
              ***  NONE  ***


   ********   WARNING MESSAGES   ********
 SO W320      48        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
 SO W320      49        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
 SO W320      50        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
```

```
SO W320       51        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
SO W320       52        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
SO W320       53        VPARM: Input Parameter May Be Out-of-Range for Parameter
   SZINIT
ME W186      454       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used
     0.50
ME W187      454       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

MX W420    34276        METQA: Wind Speed Out-of-Range.   KURDAT =
 16112904
MX W420    34282        METQA: Wind Speed Out-of-Range.   KURDAT =
 16112910
MX W420    34288        METQA: Wind Speed Out-of-Range.   KURDAT =
 16112916
MX W420    34294        METQA: Wind Speed Out-of-Range.   KURDAT =
 16112922
MX W420    34300        METQA: Wind Speed Out-of-Range.   KURDAT =
 16113004
MX W420    40768        METQA: Wind Speed Out-of-Range.   KURDAT =
 17082616
MX W420    40792        METQA: Wind Speed Out-of-Range.   KURDAT =
 17082716
MX W420    40798        METQA: Wind Speed Out-of-Range.   KURDAT =
 17082722
MX W420    40804        METQA: Wind Speed Out-of-Range.   KURDAT =
 17082804

   ************************************
   *** AERMOD Finishes Successfully ***
   ************************************
```

HARP2 - HRACalc (dated 22118) 10/26/2023 4:32:43 PM - Output Log

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

Receptor Type: Resident
Scenario: Cancer
Calculation Method: HighEnd

****
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: -0.25
Total Exposure Duration: 70

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

****
PATHWAYS ENABLED

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

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

****
INHALATION

Daily breathing rate: LongTerm24HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

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

****
SOIL & DERMAL PATHWAY SETTINGS

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

****
TIER 2 SETTINGS

Tier2 adjustments were used in this assessment. Please see the input file for details.
Tier2 - What was changed: ED or start age changed|
Calculating cancer risk
Cancer risk breakdown by pollutant and receptor saved to: C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley Warehouse - Revised (Construction)\HARP2\ASHLEY WAREHOUSE (CONSTRUCTION)\hra\Residential CancerCancerRisk.csv
Cancer risk total by receptor saved to: C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley Warehouse - Revised (Construction)\HARP2\ASHLEY WAREHOUSE (CONSTRUCTION)\hra\Residential CancerCancerRiskSumByRec.csv
HRA ran successfully

HARP2 - HRACalc (dated 22118) 10/26/2023 5:42:55 PM - Output Log

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

Receptor Type: Resident
Scenario: Cancer
Calculation Method: HighEnd

****
EXPOSURE DURATION PARAMETERS FOR CANCER

Start Age: 16
Total Exposure Duration: 40

Exposure Duration Bin Distribution
3rd Trimester Bin: 0
0<2 Years Bin: 0
2<9 Years Bin: 0
2<16 Years Bin: 0
16<30 Years Bin: 0
16 to 70 Years Bin: 40

****
PATHWAYS ENABLED

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

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

****
INHALATION

Daily breathing rate: LongTerm24HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

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

****
SOIL & DERMAL PATHWAY SETTINGS

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

****
TIER 2 SETTINGS

Tier2 adjustments were used in this assessment. Please see the input file for details.
Tier2 - What was changed: ED or start age changed|
Calculating cancer risk
Cancer risk breakdown by pollutant and receptor saved to: C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley Warehouse - Revised (Construction)\HARP2\ASHLEY WAREHOUSE (CONSTRUCTION)\hra\Workplace CancerCancerRisk.csv
Cancer risk total by receptor saved to: C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley Warehouse - Revised (Construction)\HARP2\ASHLEY WAREHOUSE (CONSTRUCTION)\hra\Workplace CancerCancerRiskSumByRec.csv
HRA ran successfully

HARP2 - HRACalc (dated 22118) 10/26/2023 5:46:40 PM - Output Log

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

Receptor Type: Resident
Scenario: NCChronic
Calculation Method: Derived

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

****
PATHWAYS ENABLED

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

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

****
INHALATION

Daily breathing rate: LongTerm24HR

Worker Adjustment Factors
Worker adjustment factors enabled: NO

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

****
TIER 2 SETTINGS

Tier2 adjustments were used in this assessment. Please see the input file for details.
Tier2 - What was changed: ED or start age changed|
Calculating chronic risk
Chronic risk breakdown by pollutant and receptor saved to:
C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley Warehouse - Revised (Construction)\HARP2\ASHLEY WAREHOUSE (CONSTRUCTION)\hra\ChronicNCChronicRisk.csv
Chronic risk total by receptor saved to: C:\Users\Smith\Dropbox\My PC (DESKTOP-977GSBU)\Documents\HRA\Ashley Warehouse - Revised (Construction)\HARP2\ASHLEY WAREHOUSE (CONSTRUCTION)\hra\ChronicNCChronicRiskSumByRec.csv
HRA ran successfully

On-road Mobile (Operational) Energy Usage

Unmitigated:

Step 1:

Therefore:

Average Daily VMT:

19,982 Source CalEEMod

Step 2

Given

Fleet Mix (CalEEMod Output)

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
37.37%	3.63%	11.71%	10.11%	1.74%	0.42%	0.87%	32.21%	0.03%	0.02%	1.58%	0.08%	0.23%

And

Gasoline MPG Factors for each Vehicle Class - Year 2025 (EMFAC2021 Output)

LDA	LDT1	LDT2	MDV	MCY	MH
29.549	24.672	24.006	19.249	40.421	4.413

Diesel MPG Factors for each Vehicle Class - Year 2023 (EMFAC2021 Output)

LHD1	LHD2	MHD	HHD	OBUS	UBUS	SBUS
15.896	13.198	8.712	5.690	4.801	9.456	8.215

Therefore:

Weighted Average MPG Factors

Gasoline: **26.8** Diesel: **6.4**

Step 3

Therefore:

[redacted] **daily gallons of gasoline** [redacted] **daily gallons of diesel**

or

[redacted] **annual gallons of gasoline** [redacted] **annual gallons of diesel**

Off-road Mobile (Construction) Energy Usage

Note: For the sake of simplicity, and as a conservative estimation, it was assumed that all off-road vehicles use diesel fuel as an energy source.

Given Factor:	**1,087.2**	**metric tons**	**CO2**	**(provided in CalEEMod Output File)**	
Conversion Factor	2204.6262	pounds	per metric ton		
Intermediate Result:	**2,396,759**	**pounds**	**CO2**		
Conversion Factor.	22.38	pounds	CO2 per 1 gallon of diesel fuel	Source: U.S. EIA, 2016	
Final Result:	[redacted]	**gallons**	**diesel fuel**	http://www.eia.gov/tools/faqs/faq.cfm?id=307&t=11	

Mitigated Onsite Scenario	Total CO2 (MT/yr) (provided in CalEEMod Output File)
Site Preparation (2023)	158
Site Preparation (2024)	231

On-road Mobile (Construction) Energy Usage - Site Preparation

Note: Year 2021 MPG factors were derived for construction-releated energy consumption (for the sake of a conservative estimate).

Step 1: **Total Daily Worker Trips (CalEEMod Output)**

18

Worker Trip Length (miles) (CalEEMod Output)

11.9

Therefore:

Average Worker Daily VMT:

214

Step 2: Given:

Assumed Fleet Mix for Workers (Percentage mix is provided on Appendix A: Calculation Details for CalEEMOD p. 15)

LDA	LDT1	LDT2
0.5	0.25	0.25

And:

Gasoline MPG Factors for each Vehicle Class (EMFAC2021 Output) - Year 2023

LDA	LDT1	LDT2
28.55	23.82	22.98

Therefore:

Weighted Average Worker MPG Factor

26.0

Step 3: **Therefore:**

8.2 Worker daily gallons of gasoline

Step 4: **161 # of Days (CalEEMod Output)**

Therefore:

Result: [redacted] **Total gallons of gasoline**

On-road Mobile (Construction) Energy Usage - Grading

Note: Year 2021 MPG factors were derived for construction-releated energy consumption (for the sake of a conservative estimate).

Step 1:

Total Daily Worker Trips (CalEEMod Output)
20

Worker Trip Length (miles) (CalEEMod Output)
11.9

Therefore:
Average Worker Daily VMT:
238

Total Hauling Trips (CalEEMod Output)
-

Hauling Trip Length (miles) (CalEEMod Output)
20

Average Vendor Daily VMT:
-

Step 2: Given:

Assumed Fleet Mix for Workers

LDA	LDT1	LDT2
0.5	0.25	0.25

(Percentage mix is provided on Appendix A: Calculation Details for CalEEMOD p. 15)

Fleet Mix for Workers (Conservative Estimate)

MHD	HHD
0%	100%

And:

Gasoline MPG Factors for each Vehicle Class (EMFAC2021 Output) - Year 2023

LDA	LDT1	LDT2
28.55	23.82	22.98

Diesel:

MHD	HHD
8.58	5.60

Therefore:
Weighted Average Worker MPG Factor
26.0

Weighted Average Hauling (Diesel) MPG Factor
5.6

Step 3: **Therefore:**
9.2 **Worker daily gallons of gasoline**

Step 4: **155 # of Days (CalEEMod Output)**

Therefore:
Result: [redacted] **Total gallons of gasoline**

Therefore:
[redacted] **Total gallons of diesel**

On-road Mobile (Construction) Energy Usage - Building Construction

Note: Year 2021 MPG factors were derived for construction-releated energy consumption (for the sake of a conservative estimate).

Step 1:

Total Daily Worker Trips (CalEEMod Output)
6
Note: Assumes 5% of workers are on-site on a given day.

Worker Trip Length (miles) (CalEEMod Output)
11.9

Therefore:
Average Worker Daily VMT:
74

Total Daily Vendor Trips (CalEEMod Output)
2
Note: Assumes 5% of workers are on-site on a given day.

Vendor Trip Length (miles) (CalEEMod Output)
9.1

Average Vendor Daily VMT:
22

Step 2:

Given:
Assumed Fleet Mix for Workers (Percentage mix is provided on Appendix A: Calculation Details for CalEEMOD p. 15)

LDA	**LDT1**	**LDT2**
0.5	**0.25**	**0.25**

Assumed Fleet Mix for Vendors

Fleet Mix for Workers (CalEEMod Output)

MHD	**HHD**
100%	**0%**

And:
MPG Factors for each Vehicle Class (from EMFAC2021) - Year 2023

Gasoline:

LDA	**LDT1**	**LDT2**
28.55	**23.82**	**22.98**

Diesel:

MHD	**HHD**
8.58	**5.60**

Therefore:
Weighted Average Worker (Gasoline) MPG Factor
26.0

Weighted Average Vendor (Diesel) MPG Factor
8.6

Step 3:

Therefore:
3 Worker daily gallons of gasoline

Therefore:
3 Vendor daily gallons of diesel

Step 4:

150 # of Days (CalEEMod Output)

Therefore:
[redacted] **Total gallons of gasoline**

Therefore:
[redacted] **Total gallons of diesel**

On-road Mobile (Construction) Energy Usage - Paving

Note: Year 2021 MPG factors were derived for construction-releated energy consumption (for the sake of a conservative estimate).

Step 1: **Total Daily Worker Trips (CalEEMod Output)**
15

Total Hauling Trips (CalEEMod Output)

Worker Trip Length (miles) (CalEEMod Output)
11.9

Hauling Trip Length (miles) (CalEEMod Output)
20

Therefore:
Average Worker Daily VMT:
179

Average Vendor Daily VMT:
-

Step 2: Given:
Assumed Fleet Mix for Workers (Percentage mix is provided on Appendix A: Calculation Details for CalEEMOD p. 15)

LDA	LDT1	LDT2
0.5	0.25	0.25

Fleet Mix for Workers (Conservative Estimate)

MHD	HHD
0%	100%

And:
Gasoline MPG Factors for each Vehicle Class (EMFAC2021 Output) - Year 2023

LDA	LDT1	LDT2
28.55	23.82	22.98

Diesel:

MHD	HHD
8.58	5.60

Therefore:
Weighted Average Worker MPG Factor
26.0

Weighted Average Hauling (Diesel) MPG Factor
5.6

Step 3: **Therefore:**
6.9 Worker daily gallons of gasoline

Step 4: **90 # of Days (CalEEMod Output)**

Therefore:
Result: **618 Total gallons of gasoline**

Therefore:
[illegible] Total gallons of diesel

On-road Mobile (Construction) Energy Usage - Architectural Coatings

Note: Year 2021 MPG factors were derived for construction-releated energy consumption (for the sake of a conservative estimate).

Step 1:

Total Daily Worker Trips (CalEEMod Output)
1

Total Hauling Trips (CalEEMod Output)
-

Worker Trip Length (miles) (CalEEMod Output)
11.9

Hauling Trip Length (miles) (CalEEMod Output)
20

Therefore:

Average Worker Daily VMT:
15

Average Vendor Daily VMT:
-

Step 2:

Given:

Assumed Fleet Mix for Workers (Percentage mix is provided on Appendix A: Calculation Details for CalEEMOD p. 15)

LDA	LDT1	LDT2
0.5	0.25	0.25

Fleet Mix for Workers (Conservative Estimate)

MHD	HHD
0%	100%

And:

Gasoline MPG Factors for each Vehicle Class (EMFAC2021 Output) - Year 2023

LDA	LDT1	LDT2
28.55	23.82	22.98

Diesel:

MHD	HHD
8.58	5.60

Therefore:

Weighted Average Worker MPG Factor
26.0

Weighted Average Hauling (Diesel) MPG Factor
5.6

Step 3: **Therefore:**

0.6 **Worker daily gallons of gasoline**

Step 4: 121 **# of Days (CalEEMod Output)**

Therefore:

Result: [redacted] **Total gallons of gasoline**

Therefore:

[redacted] **Total gallons of diesel**

Source EMFAC2021 (v1 0 1) Emissions Inventory
Region Type County
Region: San Joaquin
Calendar Year 2023, 2025
Season: Annual
Vehicle Classification EMFAC202x Categories
Units miles/day for CVMT and EVMT, trips/day for Trips, kWh/day for Energy Consumption, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Population	Total VMT	Trips	Fuel Consumption	MPG		
San Joaquin	2023	All Other Buses	Aggregate	Aggregate	Diesel	63 39460475	3393 93922	564.2119822	0 391421545	**8.670803**		
San Joaquin	2023	LDA	Aggregate	Aggregate	Gasoline	246367.0682	9973102.47	1138235.391	349 3216614	**28.54991**		
San Joaquin	2023	LDA	Aggregate	Aggregate	Diesel	705.734891	23139 8254	3023.214022	0 543997543	**42.53664**		
San Joaquin	2023	LDT1	Aggregate	Aggregate	Gasoline	22016.87719	727225.714	95173.38769	30 52486616	**23.82404**		
San Joaquin	2023	LDT1	Aggregate	Aggregate	Diesel	6.309776167	72.3140659	18 53577151	0 002954101	**24.47922**		
San Joaquin	2023	LDT2	Aggregate	Aggregate	Gasoline	99986 64004	4006976.31	463638.6569	174 3583341	**22.98127**		
San Joaquin	2023	LDT2	Aggregate	Aggregate	Diesel	269.0353638	11767 7731	1277.639106	0 369317903	**31.86353**		
San Joaquin	2023	LHD1	Aggregate	Aggregate	Gasoline	9831 305478	343356.563	146471.803	37 0137846	**9.276451**		
San Joaquin	2023	LHD1	Aggregate	Aggregate	Diesel	8858.793592	311287 78	111432.479	19 67413691	**15.82218**		
San Joaquin	2023	LHD2	Aggregate	Aggregate	Gasoline	1172.202392	40932 8123	17464.06906	4.90823024	**8.339628**		
San Joaquin	2023	LHD2	Aggregate	Aggregate	Diesel	3130.564849	115648.086	39378 56755	8 863291415	**13.04798**		
San Joaquin	2023	MCY	Aggregate	Aggregate	Gasoline	12111 77426	65765.9483	24223.54852	1.643730409	**40.01018**		
San Joaquin	2023	MDV	Aggregate	Aggregate	Gasoline	94539 47242	3309649.73	427287 8869	178.486066	**18.5429**		
San Joaquin	2023	MDV	Aggregate	Aggregate	Diesel	1386 649679	54072.4946	6485 715736	2.267270858	**23.84916**		
San Joaquin	2023	MH	Aggregate	Aggregate	Gasoline	1507 494843	13134.1796	150.8097841	2.977418428	**4.411264**		
San Joaquin	2023	MH	Aggregate	Aggregate	Diesel	642.7961913	5646 6428	64 27961913	0.600452961	**9.403972**		
San Joaquin	2023	Motor Coach	Aggregate	Aggregate	Diesel	17 50069597	2493.47591	402 1659934	0.455354651	**5.475899**		
San Joaquin	2023	OBUS	Aggregate	Aggregate	Gasoline	184.2186442	8143 5346	3685.846633	1.733278965	**4.69834**		
San Joaquin	2023	PTO	Aggregate	Aggregate	Diesel	0	19769 5175	0	4 013121008	**4.92622**		
San Joaquin	2023	SBUS	Aggregate	Aggregate	Gasoline	127.6658449	7011 40481	510.6633795	0.69096273	**10.1473**		
San Joaquin	2023	SBUS	Aggregate	Aggregate	Diesel	488.0661519	10999 7571	7067.197879	1 346323697	**8.170217**		
San Joaquin	2023	T6 CAIRP Class 4	Aggregate	Aggregate	Diesel	10 21525791	684.779876	234.7466267	0 077405114	**8.846701**		
San Joaquin	2023	T6 CAIRP Class 5	Aggregate	Aggregate	Diesel	13.70885779	939.491781	315.0295519	0.106056052	**8.858446**		
San Joaquin	2023	T6 CAIRP Class 6	Aggregate	Aggregate	Diesel	43.24157557	2453 39435	993.6914066	0.273109788	**8.98318**		
San Joaquin	2023	T6 CAIRP Class 7	Aggregate	Aggregate	Diesel	74.64743229	15398.8197	1715 397994	1.609252898	**9.568925**	**MHD**	
San Joaquin	2023	T6 Instate Delivery Class 4	Aggregate	Aggregate	Diesel	243.75384	8276.65194	3478.73297	1 005561316	**8.230877**	**8.579141**	
San Joaquin	2023	T6 Instate Delivery Class 5	Aggregate	Aggregate	Diesel	156.2432876	5383 85911	2229.591714	0 657027122	**8.194272**		
San Joaquin	2023	T6 Instate Delivery Class 6	Aggregate	Aggregate	Diesel	682 6025228	23363 9411	9740.738001	2 839033489	**8.229541**		
San Joaquin	2023	T6 Instate Delivery Class 7	Aggregate	Aggregate	Diesel	122.4768589	6703 21055	1747.744776	0 802391793	**8.354037**		
San Joaquin	2023	T6 Instate Other Class 4	Aggregate	Aggregate	Diesel	449 8451938	18399.4289	5200.21044	2.166542487	**8.492531**		
San Joaquin	2023	T6 Instate Other Class 5	Aggregate	Aggregate	Diesel	1174.570894	51943 6226	13578.03953	6 096265009	**8.520565**		
San Joaquin	2023	T6 Instate Other Class 6	Aggregate	Aggregate	Diesel	912 5417949	38573.6428	10548.98315	4 50612298	**8.560273**		
San Joaquin	2023	T6 Instate Other Class 7	Aggregate	Aggregate	Diesel	553 092214	25667.2012	6393.745994	2 950154535	**8.70029**		
San Joaquin	2023	T6 Instate Tractor Class 6	Aggregate	Aggregate	Diesel	10.69132111	510.925844	123.591672	0 060247854	**8.480399**		
San Joaquin	2023	T6 Instate Tractor Class 7	Aggregate	Aggregate	Diesel	696.5366058	42802 4924	8051.963163	4 748833943	**9.013264**		
San Joaquin	2023	T6 OOS Class 4	Aggregate	Aggregate	Diesel	5 905142679	392.334655	135 7001788	0 044317954	**8.852725**		
San Joaquin	2023	T6 OOS Class 5	Aggregate	Aggregate	Diesel	7 890998517	538.212595	181 3351459	0 060737656	**8.861267**		
San Joaquin	2023	T6 OOS Class 6	Aggregate	Aggregate	Diesel	24 97157764	1406 36491	573 8468541	0 156409596	**8.991551**		
San Joaquin	2023	T6 OOS Class 7	Aggregate	Aggregate	Diesel	40 57354344	10226.0217	932.3800283	1.062980063	**9.620144**		
San Joaquin	2023	T6 Public Class 4	Aggregate	Aggregate	Diesel	32 09216486	1056 60486	164.6328057	0.140824099	**7.503012**		
San Joaquin	2023	T6 Public Class 5	Aggregate	Aggregate	Diesel	76 27568061	2776 64108	391 2942415	0.361173048	**7.687841**		
San Joaquin	2023	T6 Public Class 6	Aggregate	Aggregate	Diesel	126.4582156	4446 297	648 7306462	0.576020372	**7.718993**		
San Joaquin	2023	T6 Public Class 7	Aggregate	Aggregate	Diesel	152.7305258	6768.06936	783 5075973	0 883776286	**7.658125**		
San Joaquin	2023	T6 Utility Class 5	Aggregate	Aggregate	Diesel	33.47606031	1364 93307	428.493572	0 154770907	**8.819055**		
San Joaquin	2023	T6 Utility Class 6	Aggregate	Aggregate	Diesel	6.356456131	257.430851	81 36263848	0 029104667	**8.845002**		
San Joaquin	2023	T6 Utility Class 7	Aggregate	Aggregate	Diesel	7.230830053	358 500092	92 55462468	0.040337535	**8.887506**		
San Joaquin	2023	T6TS	Aggregate	Aggregate	Gasoline	560 525111	27400.6685	11214.98642	5.873758607	**4.664929**		
San Joaquin	2023	T7 CAIRP Class 8	Aggregate	Aggregate	Diesel	1500.771839	308143.872	34487.73687	51 00604804	**6.04132**	**HHD**	
San Joaquin	2023	T7 NNOOS Class 8	Aggregate	Aggregate	Diesel	1343 474448	364734.036	30873 04281	59 83110996	**6.09606**	**5.596459**	
San Joaquin	2023	T7 NOOS Class 8	Aggregate	Aggregate	Diesel	562.3598205	132501.396	12923 02868	21 97566159	**6.029461**		
San Joaquin	2023	T7 Other Port Class 8	Aggregate	Aggregate	Diesel	28 6781176	5381.65764	469 174004	0.90785985	**5.927851**		
San Joaquin	2023	T7 POAK Class 8	Aggregate	Aggregate	Diesel	131 1211785	13188.0173	2145 142481	2 26470624	**5.823279**		
San Joaquin	2023	T7 POLA Class 8	Aggregate	Aggregate	Diesel	139.588006	18353 09	2283.659779	3.154875131	**5.817374**		
San Joaquin	2023	T7 Public Class 8	Aggregate	Aggregate	Diesel	387 066761	16533 9411	1985 652484	3.205449572	**5.158072**		
San Joaquin	2023	T7 Single Concrete/Transit Mix Class 8	Aggregate	Aggregate	Diesel	118.1878034	8595 90453	1113 329108	1.467125303	**5.859012**		
San Joaquin	2023	T7 Single Dump Class 8	Aggregate	Aggregate	Diesel	486.5561857	30707 0394	4583 359269	5.327318734	**5.76407**		
San Joaquin	2023	T7 Single Other Class 8	Aggregate	Aggregate	Diesel	1040.735731	57042 4876	9803 730584	9 736964144	**5.858344**		
San Joaquin	2023	T7 SWCV Class 8	Aggregate	Aggregate	Diesel	175 044521	11346.9523	805 2047965	4 507153801	**2.517543**		
San Joaquin	2023	T7 Tractor Class 8	Aggregate	Aggregate	Diesel	2638 276559	211937.817	38334.1584	34.91925222	**6.069369**		
San Joaquin	2023	T7 Utility Class 8	Aggregate	Aggregate	Diesel	23 22093261	1080 67322	297.2279374	0 186573576	**5.792209**		
San Joaquin	2023	T7IS	Aggregate	Aggregate	Gasoline	2.419215607	60.0081934	48 40366587	0 018776223	**3.195967**		
San Joaquin	2023	UBUS	Aggregate	Aggregate	Gasoline	49 369827	3719 55506	197.479308	0.791708132	**4.698139**		
San Joaquin	2023	UBUS	Aggregate	Aggregate	Diesel	78 33872382	5427 523	313.3548953	0.602229331	**9.012386**		
San Joaquin	2025	All Other Buses	Aggregate	Aggregate	Diesel	67.92171408	3454.27959	604 5032553	0 395338932	**8.737514**		
San Joaquin	2025	LDA	Aggregate	Aggregate	Gasoline	247812.193	10065418 7	1143376.643	340 6379829	**29.54873**		
San Joaquin	2025	LDA	Aggregate	Aggregate	Diesel	620 8563183	19917.7375	2643 071074	0 459921869	**43.30678**		
San Joaquin	2025	LDT1	Aggregate	Aggregate	Gasoline	20969 62889	704503 526	90823.61908	28 55436416	**24.67236**		
San Joaquin	2025	LDT1	Aggregate	Aggregate	Diesel	5.057977491	54.7985719	14 33247387	0 002232746	**24.54313**		
San Joaquin	2025	LDT2	Aggregate	Aggregate	Gasoline	105887 2734	4297523.94	491668 9279	179 0193905	**24.00591**		
San Joaquin	2025	LDT2	Aggregate	Aggregate	Diesel	305.5941154	13558 4186	1463.961841	0 410704288	**33.01261**		
San Joaquin	2025	LHD1	Aggregate	Aggregate	Gasoline	9450 489324	335570 018	140798.2097	34 90157426	**9.614753**		
San Joaquin	2025	LHD1	Aggregate	Aggregate	Diesel	8447.684296	292201.982	106261.2413	18 38163512	**15.89641**		
San Joaquin	2025	LHD2	Aggregate	Aggregate	Gasoline	1129.168714	39496 2437	16822 93138	4 600897482	**8.584465**		
San Joaquin	2025	LHD2	Aggregate	Aggregate	Diesel	3098.911716	112092 227	38980 41096	8.493201579	**13.19788**		
San Joaquin	2025	MCY	Aggregate	Aggregate	Gasoline	12009 69999	64631.0827	24019 39998	1 598967718	**40.42051**		
San Joaquin	2025	MDV	Aggregate	Aggregate	Gasoline	92446 53152	3253692.9	417141 1232	169 0306745	**19.24913**		
San Joaquin	2025	MDV	Aggregate	Aggregate	Diesel	1393 091492	51951 9772	6420 977754	2.139013823	**24.28782**		
San Joaquin	2025	MH	Aggregate	Aggregate	Gasoline	1345.73466	11738.0981	134 6272954	2 660033836	**4.412763**		
San Joaquin	2025	MH	Aggregate	Aggregate	Diesel	631.6240768	5453.24118	63 16240768	0 580283559	**9.397546**		
San Joaquin	2025	Motor Coach	Aggregate	Aggregate	Diesel	18 80772922	2514 51501	432 2016174	0 452917647	**5.551815**		
San Joaquin	2025	OBUS	Aggregate	Aggregate	Gasoline	170 8324994	7309 03024	3418 016649	1.52248184	**4.800734**		

San Joaquin	2025	PTO	Aggregate	Aggregate	Diesel	0	20105.4227	0	3.98427046	**5.046199**	
San Joaquin	2025	SBUS	Aggregate	Aggregate	Gasoline	131.6189784	7271.29468	526.4759134	0 71341232	**10.19228**	
San Joaquin	2025	SBUS	Aggregate	Aggregate	Diesel	490 2787139	10849.6548	7099 235777	1 320741795	**8.214819**	**MHD**
San Joaquin	2025	T6 CAIRP Class 4	Aggregate	Aggregate	Diesel	10.57610418	697.742444	243.038874	0 077548733	**8.997471**	**8.711536**
San Joaquin	2025	T6 CAIRP Class 5	Aggregate	Aggregate	Diesel	14.00551629	958.755772	321 8467643	0.106617779	**8.992457**	
San Joaquin	2025	T6 CAIRP Class 6	Aggregate	Aggregate	Diesel	47 29566683	2488 35531	1086.854424	0.272426579	**9.13404**	
San Joaquin	2025	T6 CAIRP Class 7	Aggregate	Aggregate	Diesel	78 11014265	15772.0773	1794.971078	1.605687139	**9.822634**	
San Joaquin	2025	T6 Instate Delivery Class 4	Aggregate	Aggregate	Diesel	252.424868	8475.97193	3602 102866	1 019116289	**8.316982**	
San Joaquin	2025	T6 Instate Delivery Class 5	Aggregate	Aggregate	Diesel	162 4907366	5516.89416	2318.742812	0.666350411	**8.279269**	
San Joaquin	2025	T6 Instate Delivery Class 6	Aggregate	Aggregate	Diesel	708 1406495	23932.0747	10105.16707	2 87788442	**8.315857**	
San Joaquin	2025	T6 Instate Delivery Class 7	Aggregate	Aggregate	Diesel	127.2799027	6929.15534	1816.284212	0.825964977	**8.389164**	
San Joaquin	2025	T6 Instate Other Class 4	Aggregate	Aggregate	Diesel	457.3843802	18839.146	5287.363435	2.200026822	**8.563144**	
San Joaquin	2025	T6 Instate Other Class 5	Aggregate	Aggregate	Diesel	1233 945904	53254.2945	14264 41465	6.208167542	**8.578102**	
San Joaquin	2025	T6 Instate Other Class 6	Aggregate	Aggregate	Diesel	939 5521797	39531.7219	10861 2232	4 582174014	**8.627285**	
San Joaquin	2025	T6 Instate Other Class 7	Aggregate	Aggregate	Diesel	601 2468734	26326 7381	6950.413857	3 002944814	**8.766974**	
San Joaquin	2025	T6 Instate Tractor Class 6	Aggregate	Aggregate	Diesel	11 09411194	521 271565	128 2479341	0 060836197	**8.568444**	
San Joaquin	2025	T6 Instate Tractor Class 7	Aggregate	Aggregate	Diesel	742 8431118	44239.5012	8587 266373	4.878765067	**9.067766**	
San Joaquin	2025	T6 OOS Class 4	Aggregate	Aggregate	Diesel	6 191325924	405.515484	142.2766697	0 044545776	**9.103343**	
San Joaquin	2025	T6 OOS Class 5	Aggregate	Aggregate	Diesel	8 158025029	556.294323	187 4714152	0.061223253	**9.086324**	
San Joaquin	2025	T6 OOS Class 6	Aggregate	Aggregate	Diesel	27 75525515	1453.61298	637.8157633	0 156720574	**9.275189**	
San Joaquin	2025	T6 OOS Class 7	Aggregate	Aggregate	Diesel	42 05361037	10569.5739	966.3919663	1 066856767	**9.90721**	
San Joaquin	2025	T6 Public Class 4	Aggregate	Aggregate	Diesel	30 96340517	1050.77782	158 8422685	0 137051326	**7.667039**	
San Joaquin	2025	T6 Public Class 5	Aggregate	Aggregate	Diesel	77 40598482	2785.90976	397.0927021	0 357713881	**7.788095**	
San Joaquin	2025	T6 Public Class 6	Aggregate	Aggregate	Diesel	124 4648645	4446.56253	638 5047549	0.566454177	**7.849819**	
San Joaquin	2025	T6 Public Class 7	Aggregate	Aggregate	Diesel	148 2002736	6742.4666	760 2674038	0.856702113	**7.870258**	
San Joaquin	2025	T6 Utility Class 5	Aggregate	Aggregate	Diesel	33.80713566	1371 26265	432 7313364	0 154052822	**8.90125**	
San Joaquin	2025	T6 Utility Class 6	Aggregate	Aggregate	Diesel	6 404694197	258.753793	81 98008572	0 028984726	**8.927246**	
San Joaquin	2025	T6 Utility Class 7	Aggregate	Aggregate	Diesel	7.233394318	359 399463	92 58744727	0 039964166	**8.993043**	
San Joaquin	2025	T6TS	Aggregate	Aggregate	Gasoline	531 0756316	27321 54	10625 76124	5.695995374	**4.796623**	**HHD**
San Joaquin	2025	T7 CAIRP Class 8	Aggregate	Aggregate	Diesel	1559.383676	317454.145	35834 63687	51 17555421	**6.203238**	**5.689878**
San Joaquin	2025	T7 NNOOS Class 8	Aggregate	Aggregate	Diesel	1399.986354	379791.503	32171 68641	59 50406302	**6.382615**	
San Joaquin	2025	T7 NOOS Class 8	Aggregate	Aggregate	Diesel	592 9033383	137971.507	13624 91871	22 13949036	**6.231919**	
San Joaquin	2025	T7 Other Port Class 8	Aggregate	Aggregate	Diesel	31.09466321	5773.39367	508 7086901	0 965450648	**5.979999**	
San Joaquin	2025	T7 POAK Class 8	Aggregate	Aggregate	Diesel	137.4284865	13680.6366	2248 330039	2.333991731	**5.861476**	
San Joaquin	2025	T7 POLA Class 8	Aggregate	Aggregate	Diesel	157 478818	19849 822	2576 353462	3.419583803	**5.804748**	
San Joaquin	2025	T7 Public Class 8	Aggregate	Aggregate	Diesel	386 4284577	16615 451	1982 377988	3 157962941	**5.261446**	
San Joaquin	2025	T7 Single Concrete/Transit Mix Class 8	Aggregate	Aggregate	Diesel	121 0999578	8533.43151	1140 761603	1 428680336	**5.972947**	
San Joaquin	2025	T7 Single Dump Class 8	Aggregate	Aggregate	Diesel	518 3758674	30855 2217	4883.100671	5 328325632	**5.790791**	
San Joaquin	2025	T7 Single Other Class 8	Aggregate	Aggregate	Diesel	1163 187559	58572.1124	10957 22681	9 897066107	**5.918129**	
San Joaquin	2025	T7 SWCV Class 8	Aggregate	Aggregate	Diesel	167 5568448	10862 3368	770.7614863	4.227120943	**2.569677**	
San Joaquin	2025	T7 Tractor Class 8	Aggregate	Aggregate	Diesel	2947 082282	219605 844	42821.10556	35.73125002	**6.146044**	
San Joaquin	2025	T7 Utility Class 8	Aggregate	Aggregate	Diesel	24.5522509	1096 54573	314.2688115	0 187591616	**5.845388**	
San Joaquin	2025	T7IS	Aggregate	Aggregate	Gasoline	1.372290651	54 2951776	27.45679134	0.014900233	**3.643915**	
San Joaquin	2025	UBUS	Aggregate	Aggregate	Gasoline	50 67993554	3818.16315	202.7197421	0.812722391	**4.697992**	
San Joaquin	2025	UBUS	Aggregate	Aggregate	Diesel	73 34639924	4977 17265	293 3855969	0 526331001	**9.456355**	