



25450-25550 Clawiter Road Industrial Project

Responses to Comments on the IS-MND

prepared by

City of Hayward

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Hayward, California 94541

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November 2021

1 Introduction

1.1 Purpose of the Response to Comments Document

This Response to Comments (RTC) document provides responses to written comments provided by the public and agencies that were received by the City of Hayward (City) following circulation of the Initial Study-Mitigated Negative Declaration (IS-MND) for the proposed 25450-25550 Clawiter Road Industrial Project, hereafter referred to as the proposed project. The IS-MND identifies the likely environmental consequences associated with implementation of the proposed project and recommends mitigation measures to reduce potentially significant impacts.

The California Environmental Quality act (CEQA) does not require formal responses to comments on an IS-MND, but instead requires that the lead agency consider the comments received [CEQA Guidelines §15074(b)]. Nevertheless, responses to the comments are included in this document to provide a complete environmental record.

1.2 Comments Received

Pursuant to CEQA, lead agencies are required to circulate a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) and provide the general public with an opportunity to comment on the Draft IS-MND. The IS-MND for the project was circulated for public review for a 30-day review period, from September 24, 2021, to October 25, 2021. During the circulation period, the City received 51 written comment letters.

Four of the letters received pertain to the proposed project, as it would be constructed and operated if approved, and as evaluated in the IS-MND. Each of these four comment letters have been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment in Section 2.2 of this RTC document identify first the number of the comment letter, and then the number assigned to each issue. For example, Response 1.1 indicates that the response is for the first issue raised in comment Letter 1.

The other 47 letters received pertain to a use of the project site that is not proposed. These letters have been grouped and included at the end of this document. These letters are not numbered because they do not pertain to the proposed project. Responses to the main theme of these letters are included in Section 2.1.

2 Comments and Responses

Written responses to each comment letter and the spoken comments received on the Initial Study-Mitigated Negative Declaration are provided in this section. Revisions to the IS-MND necessary in light of the comments received and responses provided, or necessary to amplify or clarify material in the IS-MND, are included in the responses. Underlined text represents language that has been added to the IS-MND; text with ~~strikeout~~ has been deleted from the IS-MND. Page numbers cited in this section correspond to the page numbers of the IS-MND or appendices to the IS-MND, as specified. Letters received during the public review period on the Initial Study-Mitigated Negative Declaration are provided in their entirety.

2.1 Topical Response

This subsection provides a topical response to a recurring theme in the written comments.

Topical Response: Amazon Last Mile Facility/ ecommerce Impacts

The City received numerous comments that expressed opinions, generally, that the IS-MND failed to adequately evaluate the impacts of an Amazon last-mile facility or other similar ecommerce type of use. Many of the comments received specifically suggest that the environmental analysis prepared for the project – which these commenters misunderstand as being establishment of an Amazon Last Mile Delivery Station at the site – is not adequate in regard to air quality, greenhouse gas (GHG), or transportation impacts and call for economic analysis and fair wages for workers.

The applicant proposed locating an Amazon facility at the site in April 2021 and did not receive positive feedback about the proposal. At that point, the applicant elected to not move forward with the Amazon proposal. The site is not proposed to be used for an Amazon last-mile facility or similar ecommerce use; the project as proposed and analyzed in the IS-MND would be industrial warehouses and manufacturing as permitted in the Industrial Districts regulations. Establishment of an Amazon last-mile facility (considered a Truck Terminal in the Zoning Ordinance) at the project site would be subject to a separate Conditional Use Permit and additional environmental review and approval process. In other words, use of the site for an Amazon last-mile facility or other similar ecommerce use, if proposed in the future, would require additional CEQA, at which time specific impacts of these uses would be evaluated and mitigated, as applicable.

The IS-MND appropriately evaluates the environmental impacts of the project as proposed, including the air quality, GHG emissions, and transportation impacts. The analyses of air quality and GHG impacts is based on the anticipated vehicle trips and VMT generated by project as well as other factors such as energy use to operate the proposed industrial buildings. At the request of the applicant, the IS-MND analyzes two scenarios for transportation impacts, and each of the two scenarios is based on a different trip generation rate published by the Institute of Transportation Engineers (ITE). As described on page 124 of the IS-MND, the two scenarios evaluated include High-Cube Fulfillment Center Warehouse – Sort (ITE land use code 155) and General Light Industrial (ITE land use code 110). As noted on page 124 of the IS-MND, ITE land use code 155 best represents the vehicle trips generated by potential ecommerce tenant types. Therefore, while an Amazon last-mile facility or other similar ecommerce type uses are not proposed, the IS-MND does evaluate this potential use in terms of transportation impacts and vehicles trips, which factor into the air quality and GHG impacts. The CEQA Transportation Analysis, which is included as Appendix D to the IS-

MND, evaluates ITE land use code 155 because the analysis commenced when an ecommerce type use was still proposed at the site. The ITE land use code 110 best represents the warehouse uses that could occupy the proposed buildings. As shown in Table 27 on page 124 of the IS-MND, ITE land use code 110 generates fewer trips than ITE land use code 155. Both ITE land use codes are described in detail in the CEQA Transportation Analysis, which is included as Appendix D to the IS-MND.

As described on pages 27 through 36 of the IS-MND, the air quality impacts of the project would be less than significant without mitigation. Table 7 and Table 8 on page 36 of the IS-MND show the estimated daily and annual air pollution emissions of the project. The estimated emissions were determined using the California Emissions Estimator Model (CalEEMod). The air pollution emissions of the project include the expected vehicle trips and VMT of the project, which were based on the CEQA Transportation Analysis included as Appendix D to the IS-MND. To provide the most conservative analysis, vehicle trips were modeled using the ITE land use code 155 trip generation rate.

The GHG impacts of the project are discussed on page 67 through page 75 of the IS-MND. As described on page 71 of the IS-MND, regardless of which trip generation rate is modeled in CalEEMod (ITE land use code 155 or 110), the proposed project would exceed significance thresholds established by the Bay Area Air Quality Management District, and impacts would be potentially significant. To mitigate those impacts to a level of less than significant, the applicant must implement Mitigation Measure GHG-1: Greenhouse Gas Reduction Plan, as detailed on pages 72 and 73 of the IS-MND. As described in the mitigation measure, after implementing on-site GHG emissions reductions such as use of all electric appliances, ensuring all electricity is from renewable sources, implementation of a Transportation Demand Management (TDM) program for workers, and other measures, the applicant may implement off-site measures such as undertaking or funding activities that reduce or sequester GHG emissions or purchase carbon offsets. With implementation of Mitigation Measure GHG-1, the GHG related impacts would be reduced to a level of less than significant.

Transportation related CEQA analysis does not analyze impacts to roadways or pavement, but instead analyzes Vehicle Miles Traveled (VMT). Per the City's adopted VMT thresholds, the proposed project screened out because the site is located in an area that is below the existing regional average VMT per employee (see page 127 of the IS-MND). However, while not a component of CEQA, the City does perform routine maintenance of local streets within its jurisdiction, which includes resurfacing and paving roadways. These roadway activities are within the scope of routine maintenance and would not result in significant impacts.

Accordingly, because the project site would not be used for an Amazon last-mile facility or similar ecommerce use, comments pertaining to inadequate analysis or mitigation of impacts resulting from an Amazon last-mile facility or similar ecommerce use are not applicable. Additionally, as described in this response and more thoroughly in the IS-MND, impacts associated with operation of the proposed buildings would be less than significant with mitigation where warranted. No revisions to the IS-MND are required in response to this comment.

2.2 Individual Responses

Written comments on the Draft EIR and associated responses are presented in the following section.

LETTER 1

SHUTE MIHALY
& WEINBERGER LLP

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ELLISON FOLK
Attorney
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October 25, 2021

Via E-Mail

Ms. Leigha Schmidt
City of Hayward
Planning Division
777 B Street
Hayward, California 94541
Leigha.Schmidt@hayward-ca.gov

Re: Mitigated Negative Declaration for 25450-25550 Clawiter Road
Industrial Project

Dear Ms. Schmidt:

On behalf of the San Francisco Bay Chapter of the Sierra Club, I submit the attached air quality report prepared by Baseline in connection with the Mitigated Negative Declaration and Initial Study for the above-referenced project. Please include this in the record of proceedings for this matter.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Ellison Folk

Attachment

1431288.1



25 October 2021
21213-00

Ellison Folk, Partner
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421

Subject: Review of Air Quality and Greenhouse Gas Emissions Impacts Analyzed in the Initial Study for the 25450-25550 Clawiter Road Industrial Project

Dear Ms. Folk:

Baseline Environmental Consulting has reviewed the Initial Study for the 25450-25550 Clawiter Road Industrial Project (project) in the City of Hayward to determine whether potential environmental impacts related to air quality and greenhouse gas (GHG) emissions were appropriately evaluated. Based on our review, we have identified flaws in the Initial Study analysis used to support the significance determinations, such as unsubstantiated calculations for evaluating air pollutant and GHG emissions during construction and operation. The specific concerns identified in the Initial Study analysis for potential environmental impacts related to air quality and GHG emissions are described in detail below.

Inadequate Analysis of Criteria Air Pollutant Emissions from Construction

As stated on page 9 of the Initial Study, the proposed project would require removal of the existing slab foundations and paved parking surfaces, which currently cover about 18 acres of the site. In addition, about 552 cubic yards of fill material would need to be imported during site grading (page 17 of Initial Study). These construction activities would generate a substantial number of haul trips. However, the Initial Study did not include any haul trips in the analysis of criteria air pollutant emissions during construction.

As stated on page 32 of the Initial Study, construction of the proposed project was analyzed based on defaults contained in the California Emissions Estimator Model (CalEEMod). CalEEMod provides default construction schedules and equipment profiles (equipment type, hours of activity, etc.) based on the size of the proposed project. The default construction schedules and equipment profiles are derived from a survey of over 50 construction sites in California. The CalEEMod default construction parameters can be modified based on site-specific information,

1.1

Ms. Ellison Folk
25 October 2021
Page 2

but the user is required to justify all changes from the default model settings based on substantial evidence.¹

The Initial Study modified the CalEEMod default construction schedule, but did not provide reasonable justification for the change. The biggest modification was reducing the default building construction schedule from 370 days to 134 days without increasing the intensity of equipment use to achieve this reduction in the schedule. In other words, to complete the work in less than half the default time, the intensity of default equipment used on the project site would need to be approximately doubled. In addition, the Initial Study provides no explanation for how building construction could be completed in less than half the time without increasing the intensity of equipment use. It should be noted that the Initial Study may have intended to double the amount of equipment use during building construction, because the CalEEMod output file in Appendix C, *CalEEMod Datasheets*, states the following:

“Building construction duration takes approximately half the default estimated duration. Doubled CalEEMod default equipment quantities.”

However, according to the CalEEMod output file, the default equipment quantities were not actually changed.

Overall, the Initial Study provides no justification for the exclusion of haul trips or the substantial reduction in the building construction schedule without increasing the intensity of equipment use. Therefore, additional project analysis is required to evaluate potential air quality impacts related to haul trucks and equipment activity during construction.

Inadequate Analysis of Nitrogen Oxide Emissions from Vehicle Trips

As stated on page 30 of Appendix D, *CEQA Transportation Analysis*, it is likely that the project could be used as an eCommerce site, similar to delivery and distribution operations like FedEx, UPS, and Amazon. Since eCommerce generates more vehicle trips than typical industrial land uses, the Initial Study evaluated air quality impacts associated with traffic generated by a fulfillment center warehouse.

The Initial Study estimated the project’s average daily nitrogen oxide (NO_x) emissions from vehicle trips using the current version of CalEEMod (version 2020.4.0). CalEEMod estimates NO_x emissions based on the total vehicle miles travelled (VMT) for each type of vehicle trip generated by the project. The VTM and associated emissions for each vehicle type is estimated in CalEEMod based on three key parameters:

¹ CalEEMod User Guide at § 3.4, available at http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/01_user-39-s-guide2020-4-0.pdf?sfvrsn=6.

Ms. Ellison Folk
25 October 2021
Page 3

- Trip generation rate;
- Fleet mix; and
- Travel distance per trip.

As summarized in **Table 1**, the trip generation rate used in the Initial Study was based on the Institute of Transportation Engineers' (ITE's) recommended rates for a "High-Cube Fulfillment Center Warehouse – Sort."² However, the fleet mix and travel distances used in the Initial Study were based on CalEEMod's default countywide averages for all vehicle and land use types, which are not representative of vehicle trips generated at a fulfillment center warehouse. As a result, the VMT and associated NOx emissions estimated in the Initial Study were not representative of a fulfillment center warehouse and were substantially underestimated, as described below.

Table 1. Project Trip Generation and VMT Assumptions

Vehicle Type ^A	Trip generation (Trips/KSF)	Fleet Mix	Average Miles per Trip	Total Trips per Day	Daily VMT ^D	Total Daily VMT
Initial Study Analysis ^B						
Passenger Vehicles	6.44	81%	8.0	2,010	16,080	19,952
Delivery Vans		14%	8.0	347	2,776	
Heavy Trucks		3%	8.0	65	520	
Other		3%	8.0	72	576	
Updated Analysis ^C						
Passenger Vehicles	6.725	74%	8.0	1,938	15,504	25,134
Delivery Vans		14%	10.0	369	3,690	
Heavy Trucks		11%	20.0	297	5,940	

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

^A For comparison purposes, the vehicle types from CalEEMod were grouped into the following categories:

Passenger vehicles = LDA, LDT1, LDT2

Delivery Vans = MDV, LHD1, LHD2

Heavy Trucks = MHD, HHD

Other = OBUS, UBUS, MCY, SBUS, MH

^B Trip generation, fleet mix, and miles per trip reported in Appendix C *CalEEMod Datasheets* of the Initial Study. The average miles per trip were calculated by dividing total VMT by total trips.

^C Trip generation, fleet mix, and miles per trip based on recommendations from Fehr & Peers for the 1000 Gibraltar Drive Final Environmental Impact Report.

^D Daily VMT for each vehicle type = trip generation * fleet mix * miles per trip * 387.3 KSF

In 2020, Fehr & Peers (F&P) developed trip generation rates and fleet mix values to support environmental review of a proposed fulfillment center warehouse in Milpitas (1000 Gibraltar

² See page 30 of Appendix D, *CEQA Transportation Analysis*.



Ms. Ellison Folk
25 October 2021
Page 4

Drive EIR).³ To develop representative traffic parameters, F&P collected trip count data for passenger cars, delivery vans, and heavy-duty trucks accessing an existing Amazon fulfillment center in Newark. The Amazon facility is located about 10 miles southeast of the Clawiter Road Industrial Project; therefore, the findings from the F&P study are considered representative of a proposed fulfillment center at the project site.

As summarized in **Table 1**, the F&P study⁴ found that the estimated trip generation rate for a fulfillment center (6.725 trips per thousand square feet) is higher than the trip generation rate used in the Initial Study (6.44 trips per thousand square feet). The F&P study also found that the percentage of heavy-duty trucks (11 percent) is substantially higher than the default assumption used in the Initial Study (3 percent). For the 1000 Gibraltar Drive EIR, F&P recommended a travel distance of 10 miles for delivery van trips to represent the approximate service area. For truck trips, F&P recommended using the travel distance to the Port of Oakland, which for the Clawiter Road Industrial Project would be about 20 miles. Based on these assumptions, the overall VMT generated by the proposed project would be about 26 percent higher than the overall VMT used in the Initial Study to estimate NOx emissions, and the contribution from heavy-duty trucks would be an order of magnitude higher.

Based on the findings from the F&P study, Baseline has prepared an updated analysis of the NOx emissions from vehicle trips that would be generated by a fulfillment center warehouse at the project site. A copy of the CalEEMod output file for the updated analysis is included in **Attachment A**.

As shown in **Table 2**, the updated estimate of the project's average daily NOx emissions is about 60 pounds per day (lbs/day), which is about 38 lbs/day higher than the daily NOx emissions estimated in the Initial Study. The updated NOx emissions from the project exceed the BAAQMD's threshold of 54 lbs/day. Therefore, the project would have a potentially-significant impact on regional air quality due to operational NOx emissions.

It should also be noted that the estimated average daily NOx emissions are likely lower than the peak seasonal emissions. In 2014, the South Coast Air Quality Management District (SCAQMD) completed a statewide study of warehouse truck trips to provide guidance for local agencies to evaluate warehouse truck emissions under CEQA.⁵ The study included business survey results⁶ from 34 warehouses. One of the key findings of the survey was that warehouses experience a substantial increase in trucking activities during peak season shopping months. During peak

³ WRA Environmental Consultants, 2021. 1000 Gibraltar Drive Final Environmental Impact Report. March.

⁴ Fehr & Peers, 2020. Local Transportation Analysis Report, 1000 Gibraltar Industrial Project. October.

⁵ South Coast Air Quality Management District (SCAQMD), 2014. *Warehouse Truck Trip Study Data Results and Usage*. June.

⁶ South Coast Air Quality Management District (SCAQMD), 2014. *SCAQMD High Cube Warehouse Truck Trip Study White Paper Summary of Business Survey Results*. June.

Ms. Ellison Folk
 25 October 2021
 Page 5

seasons, the average monthly increase in trucking activity was 33 percent for non-refrigerated warehouses. Based on the findings of the SCAQMD's study, operation of a fulfillment center warehouse at the project site would likely generate a substantial increase in vehicle trips and associated NOx emissions during peak seasonal shopping months.

Table 2. Updated Project Analysis of Average Daily NOx Emissions

Source	Initial Study Analysis ^A (lbs/day)	Updated Analysis ^B (lbs/day)
Area	<1	<1
Energy Source	3	3
All Vehicles	11	--
<i>Passenger Cars</i>	--	2
<i>Delivery Vans</i>	--	8
<i>Heavy Trucks</i>	--	38
Emergency Diesel Generators	9	9
Total Emissions	22	60
BAAQMD Threshold	55	55
Threshold Exceeded?	No	Yes

Notes: NOx = nitrogen oxides; lbs/day = pounds per day; BAAQMD = Bay Area Air Quality Management District; "--" = not reported.

^A NOx emissions from all sources are summarized in Table 7 on page 36 of the Initial Study. The emissions were reported for all vehicle types.

^B NOx emissions from area, energy, and emergency diesel generator sources based on the Initial Study (Table 7 on page 36). The emissions from specific vehicle types are based on the updated trip generation, fleet mix, and travel distances summarized in **Table 1**, above. Copies of the CalEEMod output files for the updated analyses of vehicle emissions are included in **Attachment A**.

Inadequate Analysis and Mitigation of GHG Emissions from Vehicle Trips

As described above, the Initial Study substantially underestimated the emissions from vehicle trips generated by the project. Using the same approach as NOx emissions, Baseline has prepared an updated analysis of the GHG emissions from vehicle trips that would be generated by a fulfillment center warehouse at the project site. A copy of the CalEEMod output file for the updated analysis is included in **Attachment A**. As shown in **Table 3**, the updated estimate of the project's annual GHG emissions is about 6,799 metric tons of carbon dioxide equivalents (CO₂e), which is over 3,000 metric tons higher than the annual GHG emissions estimated in the Initial Study. Even if one assumes the Initial Study's significance threshold of 660 metric tons of CO₂e is the correct threshold to use, based on the updated analysis, the project's annual GHG emissions would need to be reduced by about 90 percent to meet that threshold. Even greater reductions would be required to achieve no net increase in GHG emissions.

1.3

Ms. Ellison Folk
 25 October 2021
 Page 6

Mitigation Measure GHG-1 in the Initial Study requires preparation and implementation of a Greenhouse Gas Reduction Program to reduce the project's GHG emissions below the project-specific threshold, and at least 50 percent of the GHG reductions must be achieved through on-site measures. Based on the updated analysis, over 80 percent of the GHG emissions are from vehicle trips generated by the proposed project (**Table 3**). However, Mitigation Measure GHG-1 provides very little guidance on how to reduce emissions from vehicle trips, specifically from delivery vans and trucks, and there is no evidence that a 50 percent reduction from on-site GHG measures is technically feasible.

Furthermore, Mitigation Measure GHG-1 hinges on the availability of carbon offset credits. There remains uncertainty of availability of sufficient carbon offset opportunities as well as uncertainty of reliabilities with carbon credit purchases through a third party. Therefore, the successful implementation of Mitigation Measure GHG-1 is considered speculative at this time. Thus, the project's GHG emissions impact on the environment should be considered significant and unavoidable.

Table 3. Updated Project Analysis of Annual GHG Emissions

Source	Initial Study Analysis ^A (MT CO ₂ e)	Updated Analysis ^B (MT CO ₂ e)
Construction	22	22
Area	<0	<0
Energy Source	790	790
All Vehicles	2,456	--
<i>Passenger Cars</i>	--	1,507
<i>Delivery Vans</i>	--	1,120
<i>Heavy Trucks</i>	--	2,972
Solid Waste	242	242
Water	168	168
Total Emissions	3,767	6,799
Initial Study Threshold	660	660
Threshold Exceeded?	Yes	Yes

Notes: MT CO₂e = metric tons of carbon dioxide equivalents; "--" = not reported.

^A CO₂e emissions from all sources are summarized in Table 16 on page 71 of the Initial Study. The emissions were reported for all vehicle types.

^B CO₂e emissions from construction, area, energy, solid waste, and water sources based on the Initial Study (Table 16 on page 71). The emissions from specific vehicle types are based on the updated trip generation, fleet mix, and travel distances summarized in **Table 1**, above. Copies of the CalEEMod output files for the updated analyses of vehicle emissions are included in **Attachment A**.



Ms. Ellison Folk
25 October 2021
Page 7

Conclusions

Based on our review of the Initial Study and supporting appendices for the proposed project, Baseline does not believe the Initial Study or MND adequately evaluates environmental concerns related to air quality and GHG emissions described above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick Sutton', written in a cursive style.

Patrick Sutton
Environmental Engineer III

A handwritten signature in black ink, appearing to read 'Ivy Tao', written in a cursive style.

Ivy Tao, PhD
Environmental Engineer III

PS:IT:km

Attachment A
Air Pollutant Emissions Analysis
Supporting Documentation

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars****Alameda County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	387.30	1000sqft	8.89	387,300.00	0
Parking Lot	775.00	Space	11.65	310,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	63
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with IS/MND Analysis. This model run is to update analysis of emissions from passenger cars only.

Land Use - Consistent with IS/MND analysis.

Construction Phase - Consistent with IS/MND Analysis

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Trips and VMT -

Grading -

Architectural Coating - Consistent with IS/MND Analysis

Vehicle Trips - Trip rate for passenger cars based on 2020 F&P traffic study for 1000 Gibraltar Drive EIR. 74% of 6.725 trips/ksf = 5.01 trips/ksf

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

Area Coating - Consistent with IS/MND Analysis

Energy Use -

Water And Wastewater - Consistent with IS/MND

Fleet Mix - Assume 100% passenger cars

Stationary Sources - Emergency Generators and Fire Pumps -

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.01	0.00
tblFleetMix	LDA	0.57	1.00
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT2	0.18	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.0630e-003	0.00
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.11	0.00
tblFleetMix	MH	2.5190e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	8.2000e-004	0.00
tblFleetMix	SBUS	3.2400e-004	0.00
tblFleetMix	UBUS	5.9100e-004	0.00
tblLandUse	LotAcreage	6.97	11.65
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	2,100.00
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	800.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	4.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	4.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

tblVehicleTrips	ST_TR	6.42	5.01
tblVehicleTrips	SU_TR	5.09	5.01
tblVehicleTrips	WD_TR	3.93	5.01
tblWater	OutdoorWaterUseRate	0.00	1,634,685.00

2.0 Emissions Summary

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.1 Overall Construction****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.2109	2.1174	1.4621	3.1700e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	282.4597	282.4597	0.0672	6.5500e-003	286.0900
2022	7.5743	1.2943	1.5228	4.0900e-003	0.1753	0.0528	0.2282	0.0475	0.0498	0.0974	0.0000	372.5917	372.5917	0.0393	0.0210	379.8311
Maximum	7.5743	2.1174	1.5228	4.0900e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	372.5917	372.5917	0.0672	0.0210	379.8311

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.2109	2.1174	1.4621	3.1700e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	282.4595	282.4595	0.0672	6.5500e-003	286.0898
2022	7.5743	1.2943	1.5228	4.0900e-003	0.1753	0.0528	0.2282	0.0475	0.0498	0.0974	0.0000	372.5916	372.5916	0.0393	0.0210	379.8310
Maximum	7.5743	2.1174	1.5228	4.0900e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	372.5916	372.5916	0.0672	0.0210	379.8310

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2022	3-31-2022	4.2273	4.2273
2	4-1-2022	6-30-2022	4.6219	4.6219
		Highest	4.6219	4.6219

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Energy	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	1,376.5100	1,376.5100	0.0490	0.0174	1,382.9315
Mobile	0.4264	0.4084	5.6231	0.0162	2.0711	0.0109	2.0820	0.5506	0.0101	0.5607	0.0000	1,492.1909	1,492.1909	0.0525	0.0457	1,507.1107
Stationary	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Waste						0.0000	0.0000		0.0000	0.0000	97.4864	0.0000	97.4864	5.7613	0.0000	241.5185
Water						0.0000	0.0000		0.0000	0.0000	28.4143	142.6477	171.0620	2.9249	0.0702	265.1165
Total	2.3387	1.4070	6.3290	0.0195	2.0711	0.0639	2.1350	0.5506	0.0630	0.6136	125.9007	3,066.5850	3,192.4856	8.7955	0.1333	3,452.1083

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.2 Overall Operational****Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Energy	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	1,376.5100	1,376.5100	0.0490	0.0174	1,382.9315
Mobile	0.4264	0.4084	5.6231	0.0162	2.0711	0.0109	2.0820	0.5506	0.0101	0.5607	0.0000	1,492.1909	1,492.1909	0.0525	0.0457	1,507.1107
Stationary	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Waste						0.0000	0.0000		0.0000	0.0000	97.4864	0.0000	97.4864	5.7613	0.0000	241.5185
Water						0.0000	0.0000		0.0000	0.0000	28.4143	142.6477	171.0620	2.9249	0.0702	265.1165
Total	2.3387	1.4070	6.3290	0.0195	2.0711	0.0639	2.1350	0.5506	0.0630	0.6136	125.9007	3,066.5850	3,192.4856	8.7955	0.1333	3,452.1083

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

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	8/2/2021	9/22/2021	5	10	
2	Grading	Grading	9/23/2021	11/18/2021	5	35	

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

3	Building Construction	Building Construction	11/19/2021	5/25/2022	5	370
4	Architectural Coating	Architectural Coating	2/16/2022	5/25/2022	5	20
5	Paving	Paving	3/11/2022	3/31/2022	5	20

Acres of Grading (Site Preparation Phase): 15**Acres of Grading (Grading Phase): 105****Acres of Paving: 11.65****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 580,950; Non-Residential Outdoor: 193,650; Striped Parking Area: 18,600 (Architectural Coating – sqft)****OffRoad Equipment**

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

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	293.00	114.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	59.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction**3.2 Site Preparation - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3735	0.0000	0.3735	0.1920	0.0000	0.1920	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0739	0.7694	0.4019	7.2000e-004		0.0388	0.0388		0.0357	0.0357	0.0000	63.5279	63.5279	0.0206	0.0000	64.0415
Total	0.0739	0.7694	0.4019	7.2000e-004	0.3735	0.0388	0.4123	0.1920	0.0357	0.2277	0.0000	63.5279	63.5279	0.0206	0.0000	64.0415

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Site Preparation - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683
Total	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3735	0.0000	0.3735	0.1920	0.0000	0.1920	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0739	0.7694	0.4019	7.2000e-004		0.0388	0.0388		0.0357	0.0357	0.0000	63.5278	63.5278	0.0206	0.0000	64.0414
Total	0.0739	0.7694	0.4019	7.2000e-004	0.3735	0.0388	0.4123	0.1920	0.0357	0.2277	0.0000	63.5278	63.5278	0.0206	0.0000	64.0414

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Site Preparation - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683
Total	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683

3.3 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1887	0.0000	0.1887	0.0749	0.0000	0.0749	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0859	0.9512	0.6330	1.2700e-003		0.0407	0.0407		0.0374	0.0374	0.0000	111.7147	111.7147	0.0361	0.0000	112.6180
Total	0.0859	0.9512	0.6330	1.2700e-003	0.1887	0.0407	0.2294	0.0749	0.0374	0.1123	0.0000	111.7147	111.7147	0.0361	0.0000	112.6180

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Grading - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193
Total	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1887	0.0000	0.1887	0.0749	0.0000	0.0749	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0859	0.9512	0.6330	1.2700e-003		0.0407	0.0407		0.0374	0.0374	0.0000	111.7146	111.7146	0.0361	0.0000	112.6179
Total	0.0859	0.9512	0.6330	1.2700e-003	0.1887	0.0407	0.2294	0.0749	0.0374	0.1123	0.0000	111.7146	111.7146	0.0361	0.0000	112.6179

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Grading - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193
Total	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193

3.4 Building Construction - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9038	35.9038	8.6600e-003	0.0000	36.1203
Total	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9038	35.9038	8.6600e-003	0.0000	36.1203

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5700e-003	0.1144	0.0320	3.8000e-004	0.0116	1.8200e-003	0.0134	3.3600e-003	1.7400e-003	5.1000e-003	0.0000	36.5529	36.5529	6.2000e-004	5.4800e-003	38.2012
Worker	0.0138	0.0104	0.1186	3.2000e-004	0.0359	2.1000e-004	0.0361	9.5500e-003	1.9000e-004	9.7400e-003	0.0000	29.8224	29.8224	1.0200e-003	9.2000e-004	30.1214
Total	0.0193	0.1248	0.1506	7.0000e-004	0.0475	2.0300e-003	0.0496	0.0129	1.9300e-003	0.0148	0.0000	66.3753	66.3753	1.6400e-003	6.4000e-003	68.3226

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9037	35.9037	8.6600e-003	0.0000	36.1203
Total	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9037	35.9037	8.6600e-003	0.0000	36.1203

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5700e-003	0.1144	0.0320	3.8000e-004	0.0116	1.8200e-003	0.0134	3.3600e-003	1.7400e-003	5.1000e-003	0.0000	36.5529	36.5529	6.2000e-004	5.4800e-003	38.2012
Worker	0.0138	0.0104	0.1186	3.2000e-004	0.0359	2.1000e-004	0.0361	9.5500e-003	1.9000e-004	9.7400e-003	0.0000	29.8224	29.8224	1.0200e-003	9.2000e-004	30.1214
Total	0.0193	0.1248	0.1506	7.0000e-004	0.0475	2.0300e-003	0.0496	0.0129	1.9300e-003	0.0148	0.0000	66.3753	66.3753	1.6400e-003	6.4000e-003	68.3226

3.4 Building Construction - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3385	119.3385	0.0286	0.0000	120.0533
Total	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3385	119.3385	0.0286	0.0000	120.0533

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0120	0.3216	0.0902	1.2300e-003	0.0386	3.2600e-003	0.0418	0.0112	3.1200e-003	0.0143	0.0000	118.5369	118.5369	1.7900e-003	0.0178	123.8763
Worker	0.0424	0.0306	0.3630	1.0500e-003	0.1193	6.5000e-004	0.1200	0.0317	6.0000e-004	0.0323	0.0000	96.5153	96.5153	3.0600e-003	2.8100e-003	97.4304
Total	0.0544	0.3522	0.4532	2.2800e-003	0.1579	3.9100e-003	0.1618	0.0429	3.7200e-003	0.0466	0.0000	215.0521	215.0521	4.8500e-003	0.0206	221.3067

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3384	119.3384	0.0286	0.0000	120.0531
Total	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3384	119.3384	0.0286	0.0000	120.0531

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0120	0.3216	0.0902	1.2300e-003	0.0386	3.2600e-003	0.0418	0.0112	3.1200e-003	0.0143	0.0000	118.5369	118.5369	1.7900e-003	0.0178	123.8763
Worker	0.0424	0.0306	0.3630	1.0500e-003	0.1193	6.5000e-004	0.1200	0.0317	6.0000e-004	0.0323	0.0000	96.5153	96.5153	3.0600e-003	2.8100e-003	97.4304
Total	0.0544	0.3522	0.4532	2.2800e-003	0.1579	3.9100e-003	0.1618	0.0429	3.7200e-003	0.0466	0.0000	215.0521	215.0521	4.8500e-003	0.0206	221.3067

3.5 Architectural Coating - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	7.3989					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2600e-003	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0641	9.0641	5.9000e-004	0.0000	9.0788
Total	7.4061	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0641	9.0641	5.9000e-004	0.0000	9.0788

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Architectural Coating - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238
Total	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	7.3989					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2600e-003	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0640	9.0640	5.9000e-004	0.0000	9.0788
Total	7.4061	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0640	9.0640	5.9000e-004	0.0000	9.0788

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Architectural Coating - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238
Total	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238

3.6 Paving - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.2700e-003	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421
Paving	0.0115					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0197	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264
Total	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.2700e-003	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421
Paving	0.0115					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0197	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264
Total	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4264	0.4084	5.6231	0.0162	2.0711	0.0109	2.0820	0.5506	0.0101	0.5607	0.0000	1,492.1909	1,492.1909	0.0525	0.0457	1,507.1107
Unmitigated	0.4264	0.4084	5.6231	0.0162	2.0711	0.0109	2.0820	0.5506	0.0101	0.5607	0.0000	1,492.1909	1,492.1909	0.0525	0.0457	1,507.1107

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	0.00	0.00	0.00		
General Heavy Industry	1,940.37	1,940.37	1,940.37	5,664,941	5,664,941
Total	1,940.37	1,940.37	1,940.37	5,664,941	5,664,941

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
General Heavy Industry	9.50	7.30	7.30	59.00	28.00	13.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.567723	0.056525	0.181671	0.112876	0.021280	0.005063	0.013338	0.012650	0.000820	0.000591	0.024621	0.000324	0.002519
General Heavy Industry	1.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	868.7021	868.7021	0.0393	8.1300e-003	872.1059
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	868.7021	868.7021	0.0393	8.1300e-003	872.1059
NaturalGas Mitigated	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
NaturalGas Unmitigated	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.2 Energy by Land Use - Natural Gas****Unmitigated**

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	9.51596e+006	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

Mitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	9.51596e+006	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.3 Energy by Land Use - Electricity****Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	2.87764e+006	837.1382	0.0379	7.8300e-003	840.4183
Parking Lot	108500	31.5639	1.4300e-003	3.0000e-004	31.6876
Total		868.7021	0.0393	8.1300e-003	872.1059

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	2.87764e+006	837.1382	0.0379	7.8300e-003	840.4183
Parking Lot	108500	31.5639	1.4300e-003	3.0000e-004	31.6876
Total		868.7021	0.0393	8.1300e-003	872.1059

6.0 Area Detail

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Unmitigated	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2084					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.5326					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.9000e-004	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Total	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2084					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.5326					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.9000e-004	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Total	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

7.0 Water Detail**7.1 Mitigation Measures Water**

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	171.0620	2.9249	0.0702	265.1165
Unmitigated	171.0620	2.9249	0.0702	265.1165

7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	89.5631 / 1.63468	171.0620	2.9249	0.0702	265.1165
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		171.0620	2.9249	0.0702	265.1165

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**7.2 Water by Land Use****Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	89.5631 / 1.63468	171.0620	2.9249	0.0702	265.1165
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		171.0620	2.9249	0.0702	265.1165

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	97.4864	5.7613	0.0000	241.5185
Unmitigated	97.4864	5.7613	0.0000	241.5185

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**8.2 Waste by Land Use****Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	480.25	97.4864	5.7613	0.0000	241.5185
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		97.4864	5.7613	0.0000	241.5185

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	480.25	97.4864	5.7613	0.0000	241.5185
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		97.4864	5.7613	0.0000	241.5185

9.0 Operational Offroad

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	4	50	2100	0.73	Diesel
Emergency Generator	1	4	50	800	0.73	Diesel

Boilers

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

Equipment Type	Number
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10.1 Stationary Sources**Unmitigated/Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Emergency Generator - Diesel (750 - 9999 HP)	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Total	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091

11.0 Vegetation

25550 Clawiter Road Industrial Project - Updated Analysis Passenger Cars - Alameda County, Annual

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

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans****Alameda County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	387.30	1000sqft	8.89	387,300.00	0
Parking Lot	775.00	Space	11.65	310,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	63
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with IS/MND Analysis. This model run is to update analysis of emissions from delivery vans only.

Land Use - Consistent with IS/MND analysis.

Construction Phase - Consistent with IS/MND Analysis

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Trips and VMT -

Grading -

Architectural Coating - Consistent with IS/MND Analysis

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

Vehicle Trips - Trip rate for vans based on 2020 F&P traffic study for 1000 Gibraltar Drive EIR. 14% of 6.725 trips/ksf = 0.95 trips/ksf. Assumed 10 mile service area per trip.

Area Coating - Consistent with IS/MND Analysis

Energy Use -

Water And Wastewater - Consistent with IS/MND

Fleet Mix - Assume 50% delivery vans with GVWR 8501-10000 lb (LHD1) and 50% with GVWR 10001-14000 lbs (LHD2).

Stationary Sources - Emergency Generators and Fire Pumps -

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.01	0.00
tblFleetMix	LDA	0.57	0.00
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT2	0.18	0.00
tblFleetMix	LHD1	0.02	0.50
tblFleetMix	LHD2	5.0630e-003	0.50
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.11	0.00
tblFleetMix	MH	2.5190e-003	0.00
tblFleetMix	MHD	0.01	0.00
tblFleetMix	OBUS	8.2000e-004	0.00
tblFleetMix	SBUS	3.2400e-004	0.00
tblFleetMix	UBUS	5.9100e-004	0.00
tblLandUse	LotAcreage	6.97	11.65
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	2,100.00
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	800.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	4.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	4.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00
tblVehicleTrips	CC_TL	7.30	10.00
tblVehicleTrips	CNW_TL	7.30	10.00
tblVehicleTrips	CW_TL	9.50	10.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	6.42	0.95
tblVehicleTrips	SU_TR	5.09	0.95
tblVehicleTrips	WD_TR	3.93	0.95
tblWater	OutdoorWaterUseRate	0.00	1,634,685.00

2.0 Emissions Summary

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.1 Overall Construction****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.2109	2.1174	1.4621	3.1700e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	282.4597	282.4597	0.0672	6.5500e-003	286.0900
2022	7.5743	1.2943	1.5228	4.0900e-003	0.1753	0.0528	0.2282	0.0475	0.0498	0.0974	0.0000	372.5917	372.5917	0.0393	0.0210	379.8311
Maximum	7.5743	2.1174	1.5228	4.0900e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	372.5917	372.5917	0.0672	0.0210	379.8311

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.2109	2.1174	1.4621	3.1700e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	282.4595	282.4595	0.0672	6.5500e-003	286.0898
2022	7.5743	1.2943	1.5228	4.0900e-003	0.1753	0.0528	0.2282	0.0475	0.0498	0.0974	0.0000	372.5916	372.5916	0.0393	0.0210	379.8310
Maximum	7.5743	2.1174	1.5228	4.0900e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	372.5916	372.5916	0.0672	0.0210	379.8310

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2022	3-31-2022	4.2273	4.2273
2	4-1-2022	6-30-2022	4.6219	4.6219
		Highest	4.6219	4.6219

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Energy	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	1,376.5100	1,376.5100	0.0490	0.0174	1,382.9315
Mobile	0.2030	1.3933	1.3166	0.0118	0.5607	0.0196	0.5803	0.1601	0.0187	0.1788	0.0000	1,096.7041	1,096.7041	0.0141	0.0770	1,119.9935
Stationary	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Waste						0.0000	0.0000		0.0000	0.0000	97.4864	0.0000	97.4864	5.7613	0.0000	241.5185
Water						0.0000	0.0000		0.0000	0.0000	28.4143	142.6477	171.0620	2.9249	0.0702	265.1165
Total	2.1154	2.3919	2.0225	0.0151	0.5607	0.0726	0.6333	0.1601	0.0717	0.2318	125.9007	2,671.0982	2,796.9989	8.7571	0.1647	3,064.9912

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.2 Overall Operational****Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Energy	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	1,376.5100	1,376.5100	0.0490	0.0174	1,382.9315
Mobile	0.2030	1.3933	1.3166	0.0118	0.5607	0.0196	0.5803	0.1601	0.0187	0.1788	0.0000	1,096.7041	1,096.7041	0.0141	0.0770	1,119.9935
Stationary	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Waste						0.0000	0.0000		0.0000	0.0000	97.4864	0.0000	97.4864	5.7613	0.0000	241.5185
Water						0.0000	0.0000		0.0000	0.0000	28.4143	142.6477	171.0620	2.9249	0.0702	265.1165
Total	2.1154	2.3919	2.0225	0.0151	0.5607	0.0726	0.6333	0.1601	0.0717	0.2318	125.9007	2,671.0982	2,796.9989	8.7571	0.1647	3,064.9912

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

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	8/2/2021	9/22/2021	5	10	
2	Grading	Grading	9/23/2021	11/18/2021	5	35	

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

3	Building Construction	Building Construction	11/19/2021	5/25/2022	5	370
4	Architectural Coating	Architectural Coating	2/16/2022	5/25/2022	5	20
5	Paving	Paving	3/11/2022	3/31/2022	5	20

Acres of Grading (Site Preparation Phase): 15**Acres of Grading (Grading Phase): 105****Acres of Paving: 11.65****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 580,950; Non-Residential Outdoor: 193,650; Striped Parking Area: 18,600 (Architectural Coating – sqft)****OffRoad Equipment**

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

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	293.00	114.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	59.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction**3.2 Site Preparation - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3735	0.0000	0.3735	0.1920	0.0000	0.1920	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0739	0.7694	0.4019	7.2000e-004		0.0388	0.0388		0.0357	0.0357	0.0000	63.5279	63.5279	0.0206	0.0000	64.0415
Total	0.0739	0.7694	0.4019	7.2000e-004	0.3735	0.0388	0.4123	0.1920	0.0357	0.2277	0.0000	63.5279	63.5279	0.0206	0.0000	64.0415

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Site Preparation - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683
Total	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3735	0.0000	0.3735	0.1920	0.0000	0.1920	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0739	0.7694	0.4019	7.2000e-004		0.0388	0.0388		0.0357	0.0357	0.0000	63.5278	63.5278	0.0206	0.0000	64.0414
Total	0.0739	0.7694	0.4019	7.2000e-004	0.3735	0.0388	0.4123	0.1920	0.0357	0.2277	0.0000	63.5278	63.5278	0.0206	0.0000	64.0414

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Site Preparation - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683
Total	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683

3.3 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1887	0.0000	0.1887	0.0749	0.0000	0.0749	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0859	0.9512	0.6330	1.2700e-003		0.0407	0.0407		0.0374	0.0374	0.0000	111.7147	111.7147	0.0361	0.0000	112.6180
Total	0.0859	0.9512	0.6330	1.2700e-003	0.1887	0.0407	0.2294	0.0749	0.0374	0.1123	0.0000	111.7147	111.7147	0.0361	0.0000	112.6180

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Grading - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193
Total	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1887	0.0000	0.1887	0.0749	0.0000	0.0749	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0859	0.9512	0.6330	1.2700e-003		0.0407	0.0407		0.0374	0.0374	0.0000	111.7146	111.7146	0.0361	0.0000	112.6179
Total	0.0859	0.9512	0.6330	1.2700e-003	0.1887	0.0407	0.2294	0.0749	0.0374	0.1123	0.0000	111.7146	111.7146	0.0361	0.0000	112.6179

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Grading - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193
Total	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193

3.4 Building Construction - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9038	35.9038	8.6600e-003	0.0000	36.1203
Total	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9038	35.9038	8.6600e-003	0.0000	36.1203

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5700e-003	0.1144	0.0320	3.8000e-004	0.0116	1.8200e-003	0.0134	3.3600e-003	1.7400e-003	5.1000e-003	0.0000	36.5529	36.5529	6.2000e-004	5.4800e-003	38.2012
Worker	0.0138	0.0104	0.1186	3.2000e-004	0.0359	2.1000e-004	0.0361	9.5500e-003	1.9000e-004	9.7400e-003	0.0000	29.8224	29.8224	1.0200e-003	9.2000e-004	30.1214
Total	0.0193	0.1248	0.1506	7.0000e-004	0.0475	2.0300e-003	0.0496	0.0129	1.9300e-003	0.0148	0.0000	66.3753	66.3753	1.6400e-003	6.4000e-003	68.3226

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9037	35.9037	8.6600e-003	0.0000	36.1203
Total	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9037	35.9037	8.6600e-003	0.0000	36.1203

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5700e-003	0.1144	0.0320	3.8000e-004	0.0116	1.8200e-003	0.0134	3.3600e-003	1.7400e-003	5.1000e-003	0.0000	36.5529	36.5529	6.2000e-004	5.4800e-003	38.2012
Worker	0.0138	0.0104	0.1186	3.2000e-004	0.0359	2.1000e-004	0.0361	9.5500e-003	1.9000e-004	9.7400e-003	0.0000	29.8224	29.8224	1.0200e-003	9.2000e-004	30.1214
Total	0.0193	0.1248	0.1506	7.0000e-004	0.0475	2.0300e-003	0.0496	0.0129	1.9300e-003	0.0148	0.0000	66.3753	66.3753	1.6400e-003	6.4000e-003	68.3226

3.4 Building Construction - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3385	119.3385	0.0286	0.0000	120.0533
Total	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3385	119.3385	0.0286	0.0000	120.0533

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0120	0.3216	0.0902	1.2300e-003	0.0386	3.2600e-003	0.0418	0.0112	3.1200e-003	0.0143	0.0000	118.5369	118.5369	1.7900e-003	0.0178	123.8763
Worker	0.0424	0.0306	0.3630	1.0500e-003	0.1193	6.5000e-004	0.1200	0.0317	6.0000e-004	0.0323	0.0000	96.5153	96.5153	3.0600e-003	2.8100e-003	97.4304
Total	0.0544	0.3522	0.4532	2.2800e-003	0.1579	3.9100e-003	0.1618	0.0429	3.7200e-003	0.0466	0.0000	215.0521	215.0521	4.8500e-003	0.0206	221.3067

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3384	119.3384	0.0286	0.0000	120.0531
Total	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3384	119.3384	0.0286	0.0000	120.0531

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0120	0.3216	0.0902	1.2300e-003	0.0386	3.2600e-003	0.0418	0.0112	3.1200e-003	0.0143	0.0000	118.5369	118.5369	1.7900e-003	0.0178	123.8763
Worker	0.0424	0.0306	0.3630	1.0500e-003	0.1193	6.5000e-004	0.1200	0.0317	6.0000e-004	0.0323	0.0000	96.5153	96.5153	3.0600e-003	2.8100e-003	97.4304
Total	0.0544	0.3522	0.4532	2.2800e-003	0.1579	3.9100e-003	0.1618	0.0429	3.7200e-003	0.0466	0.0000	215.0521	215.0521	4.8500e-003	0.0206	221.3067

3.5 Architectural Coating - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	7.3989					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2600e-003	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0641	9.0641	5.9000e-004	0.0000	9.0788
Total	7.4061	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0641	9.0641	5.9000e-004	0.0000	9.0788

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Architectural Coating - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238
Total	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	7.3989					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2600e-003	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0640	9.0640	5.9000e-004	0.0000	9.0788
Total	7.4061	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0640	9.0640	5.9000e-004	0.0000	9.0788

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Architectural Coating - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238
Total	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238

3.6 Paving - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.2700e-003	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421
Paving	0.0115					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0197	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264
Total	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.2700e-003	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421
Paving	0.0115					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0197	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264
Total	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2030	1.3933	1.3166	0.0118	0.5607	0.0196	0.5803	0.1601	0.0187	0.1788	0.0000	1,096.704 1	1,096.704 1	0.0141	0.0770	1,119.993 5
Unmitigated	0.2030	1.3933	1.3166	0.0118	0.5607	0.0196	0.5803	0.1601	0.0187	0.1788	0.0000	1,096.704 1	1,096.704 1	0.0141	0.0770	1,119.993 5

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	367.94	367.94	367.94	1,339,283	1,339,283
Parking Lot	0.00	0.00	0.00		
Total	367.94	367.94	367.94	1,339,283	1,339,283

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Heavy Industry	10.00	10.00	10.00	59.00	28.00	13.00	100	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Heavy Industry	0.000000	0.000000	0.000000	0.000000	0.500000	0.500000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000
Parking Lot	0.567723	0.056525	0.181671	0.112876	0.021280	0.005063	0.013338	0.012650	0.000820	0.000591	0.024621	0.000324	0.002519

5.0 Energy Detail

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	868.7021	868.7021	0.0393	8.1300e-003	872.1059
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	868.7021	868.7021	0.0393	8.1300e-003	872.1059
Natural Gas Mitigated	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
Natural Gas Unmitigated	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.2 Energy by Land Use - Natural Gas****Unmitigated**

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	9.51596e+006	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

Mitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	9.51596e+006	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.3 Energy by Land Use - Electricity****Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	2.87764e+006	837.1382	0.0379	7.8300e-003	840.4183
Parking Lot	108500	31.5639	1.4300e-003	3.0000e-004	31.6876
Total		868.7021	0.0393	8.1300e-003	872.1059

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	2.87764e+006	837.1382	0.0379	7.8300e-003	840.4183
Parking Lot	108500	31.5639	1.4300e-003	3.0000e-004	31.6876
Total		868.7021	0.0393	8.1300e-003	872.1059

6.0 Area Detail

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Unmitigated	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2084					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.5326					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.9000e-004	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Total	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2084					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.5326					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.9000e-004	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Total	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

7.0 Water Detail**7.1 Mitigation Measures Water**

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	171.0620	2.9249	0.0702	265.1165
Unmitigated	171.0620	2.9249	0.0702	265.1165

7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	89.5631 / 1.63468	171.0620	2.9249	0.0702	265.1165
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		171.0620	2.9249	0.0702	265.1165

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**7.2 Water by Land Use****Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	89.5631 / 1.63468	171.0620	2.9249	0.0702	265.1165
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		171.0620	2.9249	0.0702	265.1165

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	97.4864	5.7613	0.0000	241.5185
Unmitigated	97.4864	5.7613	0.0000	241.5185

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**8.2 Waste by Land Use****Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	480.25	97.4864	5.7613	0.0000	241.5185
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		97.4864	5.7613	0.0000	241.5185

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	480.25	97.4864	5.7613	0.0000	241.5185
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		97.4864	5.7613	0.0000	241.5185

9.0 Operational Offroad

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	4	50	2100	0.73	Diesel
Emergency Generator	1	4	50	800	0.73	Diesel

Boilers

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

Equipment Type	Number
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10.1 Stationary Sources**Unmitigated/Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Emergency Generator - Diesel (750 - 9999 HP)	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Total	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091

11.0 Vegetation

25550 Clawiter Road Industrial Project - Updated Analysis Delivery Vans - Alameda County, Annual

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

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

25550 Clawiter Road Industrial Project - Updated Analysis Trucks

Alameda County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	387.30	1000sqft	8.89	387,300.00	0
Parking Lot	775.00	Space	11.65	310,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	63
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with IS/MND Analysis. This model run is to update analysis of emissions from heavy-duty trucks only.

Land Use - Consistent with IS/MND analysis.

Construction Phase - Consistent with IS/MND Analysis

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Off-road Equipment -

Trips and VMT -

Grading -

Architectural Coating - Consistent with IS/MND Analysis

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

Vehicle Trips - Trip rate for vans based on 2020 F&P traffic study for 1000 Gibraltar Drive EIR. 11% of 6.725 trips/ksf = 0.77 trips/ksf. Assumed trucks travel to and from Port of Oakland (20 miles).

Area Coating - Consistent with IS/MND Analysis

Energy Use -

Water And Wastewater - Consistent with IS/MND

Fleet Mix - Assume 50% MHD and 50% HHD.

Stationary Sources - Emergency Generators and Fire Pumps -

Table Name	Column Name	Default Value	New Value
tblFleetMix	HHD	0.01	0.50
tblFleetMix	LDA	0.57	0.00
tblFleetMix	LDT1	0.06	0.00
tblFleetMix	LDT2	0.18	0.00
tblFleetMix	LHD1	0.02	0.00
tblFleetMix	LHD2	5.0630e-003	0.00
tblFleetMix	MCY	0.02	0.00
tblFleetMix	MDV	0.11	0.00
tblFleetMix	MH	2.5190e-003	0.00
tblFleetMix	MHD	0.01	0.50
tblFleetMix	OBUS	8.2000e-004	0.00
tblFleetMix	SBUS	3.2400e-004	0.00
tblFleetMix	UBUS	5.9100e-004	0.00
tblLandUse	LotAcreage	6.97	11.65
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	2,100.00
tblStationaryGeneratorsPumpsUse	HorsePowerValue	0.00	800.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	4.00
tblStationaryGeneratorsPumpsUse	HoursPerDay	0.00	4.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	HoursPerYear	0.00	50.00
tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

tblStationaryGeneratorsPumpsUse	NumberOfEquipment	0.00	1.00
tblVehicleTrips	CC_TL	7.30	20.00
tblVehicleTrips	CNW_TL	7.30	20.00
tblVehicleTrips	CW_TL	9.50	20.00
tblVehicleTrips	DV_TP	5.00	0.00
tblVehicleTrips	PB_TP	3.00	0.00
tblVehicleTrips	PR_TP	92.00	100.00
tblVehicleTrips	ST_TR	6.42	0.77
tblVehicleTrips	SU_TR	5.09	0.77
tblVehicleTrips	WD_TR	3.93	0.77
tblWater	OutdoorWaterUseRate	0.00	1,634,685.00

2.0 Emissions Summary

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.1 Overall Construction****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.2109	2.1174	1.4621	3.1700e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	282.4597	282.4597	0.0672	6.5500e-003	286.0900
2022	7.5743	1.2943	1.5228	4.0900e-003	0.1753	0.0528	0.2282	0.0475	0.0498	0.0974	0.0000	372.5917	372.5917	0.0393	0.0210	379.8311
Maximum	7.5743	2.1174	1.5228	4.0900e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	372.5917	372.5917	0.0672	0.0210	379.8311

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.2109	2.1174	1.4621	3.1700e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	282.4595	282.4595	0.0672	6.5500e-003	286.0898
2022	7.5743	1.2943	1.5228	4.0900e-003	0.1753	0.0528	0.2282	0.0475	0.0498	0.0974	0.0000	372.5916	372.5916	0.0393	0.0210	379.8310
Maximum	7.5743	2.1174	1.5228	4.0900e-003	0.6156	0.0965	0.7121	0.2813	0.0891	0.3705	0.0000	372.5916	372.5916	0.0672	0.0210	379.8310

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

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

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2022	3-31-2022	4.2273	4.2273
2	4-1-2022	6-30-2022	4.6219	4.6219
		Highest	4.6219	4.6219

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Energy	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	1,376.5100	1,376.5100	0.0490	0.0174	1,382.9315
Mobile	0.2272	7.0034	1.4894	0.0294	0.9729	0.0810	1.0539	0.2810	0.0775	0.3586	0.0000	2,844.5878	2,844.5878	0.0415	0.4252	2,972.3280
Stationary	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Waste						0.0000	0.0000		0.0000	0.0000	97.4864	0.0000	97.4864	5.7613	0.0000	241.5185
Water						0.0000	0.0000		0.0000	0.0000	28.4143	142.6477	171.0620	2.9249	0.0702	265.1165
Total	2.1395	8.0020	2.1953	0.0328	0.9729	0.1340	1.1069	0.2810	0.1305	0.4116	125.9007	4,418.9818	4,544.8825	8.7845	0.5129	4,917.3257

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**2.2 Overall Operational****Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Energy	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	1,376.5100	1,376.5100	0.0490	0.0174	1,382.9315
Mobile	0.2272	7.0034	1.4894	0.0294	0.9729	0.0810	1.0539	0.2810	0.0775	0.3586	0.0000	2,844.5878	2,844.5878	0.0415	0.4252	2,972.3280
Stationary	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Waste						0.0000	0.0000		0.0000	0.0000	97.4864	0.0000	97.4864	5.7613	0.0000	241.5185
Water						0.0000	0.0000		0.0000	0.0000	28.4143	142.6477	171.0620	2.9249	0.0702	265.1165
Total	2.1395	8.0020	2.1953	0.0328	0.9729	0.1340	1.1069	0.2810	0.1305	0.4116	125.9007	4,418.9818	4,544.8825	8.7845	0.5129	4,917.3257

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

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	8/2/2021	9/22/2021	5	10	
2	Grading	Grading	9/23/2021	11/18/2021	5	35	

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

3	Building Construction	Building Construction	11/19/2021	5/25/2022	5	370
4	Architectural Coating	Architectural Coating	2/16/2022	5/25/2022	5	20
5	Paving	Paving	3/11/2022	3/31/2022	5	20

Acres of Grading (Site Preparation Phase): 15**Acres of Grading (Grading Phase): 105****Acres of Paving: 11.65****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 580,950; Non-Residential Outdoor: 193,650; Striped Parking Area: 18,600 (Architectural Coating – sqft)****OffRoad Equipment**

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

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	293.00	114.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	59.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction**3.2 Site Preparation - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3735	0.0000	0.3735	0.1920	0.0000	0.1920	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0739	0.7694	0.4019	7.2000e-004		0.0388	0.0388		0.0357	0.0357	0.0000	63.5279	63.5279	0.0206	0.0000	64.0415
Total	0.0739	0.7694	0.4019	7.2000e-004	0.3735	0.0388	0.4123	0.1920	0.0357	0.2277	0.0000	63.5279	63.5279	0.0206	0.0000	64.0415

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Site Preparation - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683
Total	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.3735	0.0000	0.3735	0.1920	0.0000	0.1920	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0739	0.7694	0.4019	7.2000e-004		0.0388	0.0388		0.0357	0.0357	0.0000	63.5278	63.5278	0.0206	0.0000	64.0414
Total	0.0739	0.7694	0.4019	7.2000e-004	0.3735	0.0388	0.4123	0.1920	0.0357	0.2277	0.0000	63.5278	63.5278	0.0206	0.0000	64.0414

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.2 Site Preparation - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683
Total	1.0400e-003	7.9000e-004	8.9300e-003	2.0000e-005	2.7000e-003	2.0000e-005	2.7200e-003	7.2000e-004	1.0000e-005	7.3000e-004	0.0000	2.2458	2.2458	8.0000e-005	7.0000e-005	2.2683

3.3 Grading - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1887	0.0000	0.1887	0.0749	0.0000	0.0749	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0859	0.9512	0.6330	1.2700e-003		0.0407	0.0407		0.0374	0.0374	0.0000	111.7147	111.7147	0.0361	0.0000	112.6180
Total	0.0859	0.9512	0.6330	1.2700e-003	0.1887	0.0407	0.2294	0.0749	0.0374	0.1123	0.0000	111.7147	111.7147	0.0361	0.0000	112.6180

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Grading - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193
Total	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1887	0.0000	0.1887	0.0749	0.0000	0.0749	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0859	0.9512	0.6330	1.2700e-003		0.0407	0.0407		0.0374	0.0374	0.0000	111.7146	111.7146	0.0361	0.0000	112.6179
Total	0.0859	0.9512	0.6330	1.2700e-003	0.1887	0.0407	0.2294	0.0749	0.0374	0.1123	0.0000	111.7146	111.7146	0.0361	0.0000	112.6179

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.3 Grading - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193
Total	1.2400e-003	9.4000e-004	0.0107	3.0000e-005	3.2400e-003	2.0000e-005	3.2600e-003	8.6000e-004	2.0000e-005	8.8000e-004	0.0000	2.6923	2.6923	9.0000e-005	8.0000e-005	2.7193

3.4 Building Construction - 2021**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9038	35.9038	8.6600e-003	0.0000	36.1203
Total	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9038	35.9038	8.6600e-003	0.0000	36.1203

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5700e-003	0.1144	0.0320	3.8000e-004	0.0116	1.8200e-003	0.0134	3.3600e-003	1.7400e-003	5.1000e-003	0.0000	36.5529	36.5529	6.2000e-004	5.4800e-003	38.2012
Worker	0.0138	0.0104	0.1186	3.2000e-004	0.0359	2.1000e-004	0.0361	9.5500e-003	1.9000e-004	9.7400e-003	0.0000	29.8224	29.8224	1.0200e-003	9.2000e-004	30.1214
Total	0.0193	0.1248	0.1506	7.0000e-004	0.0475	2.0300e-003	0.0496	0.0129	1.9300e-003	0.0148	0.0000	66.3753	66.3753	1.6400e-003	6.4000e-003	68.3226

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9037	35.9037	8.6600e-003	0.0000	36.1203
Total	0.0295	0.2702	0.2569	4.2000e-004		0.0149	0.0149		0.0140	0.0140	0.0000	35.9037	35.9037	8.6600e-003	0.0000	36.1203

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.5700e-003	0.1144	0.0320	3.8000e-004	0.0116	1.8200e-003	0.0134	3.3600e-003	1.7400e-003	5.1000e-003	0.0000	36.5529	36.5529	6.2000e-004	5.4800e-003	38.2012
Worker	0.0138	0.0104	0.1186	3.2000e-004	0.0359	2.1000e-004	0.0361	9.5500e-003	1.9000e-004	9.7400e-003	0.0000	29.8224	29.8224	1.0200e-003	9.2000e-004	30.1214
Total	0.0193	0.1248	0.1506	7.0000e-004	0.0475	2.0300e-003	0.0496	0.0129	1.9300e-003	0.0148	0.0000	66.3753	66.3753	1.6400e-003	6.4000e-003	68.3226

3.4 Building Construction - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3385	119.3385	0.0286	0.0000	120.0533
Total	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3385	119.3385	0.0286	0.0000	120.0533

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0120	0.3216	0.0902	1.2300e-003	0.0386	3.2600e-003	0.0418	0.0112	3.1200e-003	0.0143	0.0000	118.5369	118.5369	1.7900e-003	0.0178	123.8763
Worker	0.0424	0.0306	0.3630	1.0500e-003	0.1193	6.5000e-004	0.1200	0.0317	6.0000e-004	0.0323	0.0000	96.5153	96.5153	3.0600e-003	2.8100e-003	97.4304
Total	0.0544	0.3522	0.4532	2.2800e-003	0.1579	3.9100e-003	0.1618	0.0429	3.7200e-003	0.0466	0.0000	215.0521	215.0521	4.8500e-003	0.0206	221.3067

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3384	119.3384	0.0286	0.0000	120.0531
Total	0.0879	0.8042	0.8427	1.3900e-003		0.0417	0.0417		0.0392	0.0392	0.0000	119.3384	119.3384	0.0286	0.0000	120.0531

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.4 Building Construction - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0120	0.3216	0.0902	1.2300e-003	0.0386	3.2600e-003	0.0418	0.0112	3.1200e-003	0.0143	0.0000	118.5369	118.5369	1.7900e-003	0.0178	123.8763
Worker	0.0424	0.0306	0.3630	1.0500e-003	0.1193	6.5000e-004	0.1200	0.0317	6.0000e-004	0.0323	0.0000	96.5153	96.5153	3.0600e-003	2.8100e-003	97.4304
Total	0.0544	0.3522	0.4532	2.2800e-003	0.1579	3.9100e-003	0.1618	0.0429	3.7200e-003	0.0466	0.0000	215.0521	215.0521	4.8500e-003	0.0206	221.3067

3.5 Architectural Coating - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	7.3989					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2600e-003	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0641	9.0641	5.9000e-004	0.0000	9.0788
Total	7.4061	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0641	9.0641	5.9000e-004	0.0000	9.0788

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Architectural Coating - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238
Total	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	7.3989					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2600e-003	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0640	9.0640	5.9000e-004	0.0000	9.0788
Total	7.4061	0.0500	0.0644	1.1000e-004		2.9000e-003	2.9000e-003		2.9000e-003	2.9000e-003	0.0000	9.0640	9.0640	5.9000e-004	0.0000	9.0788

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.5 Architectural Coating - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238
Total	5.8900e-003	4.2400e-003	0.0504	1.5000e-004	0.0166	9.0000e-005	0.0167	4.4100e-003	8.0000e-005	4.4900e-003	0.0000	13.3968	13.3968	4.2000e-004	3.9000e-004	13.5238

3.6 Paving - 2022**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.2700e-003	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421
Paving	0.0115					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0197	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2022****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264
Total	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.2700e-003	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421
Paving	0.0115					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0197	0.0834	0.1094	1.7000e-004		4.2600e-003	4.2600e-003		3.9200e-003	3.9200e-003	0.0000	15.0207	15.0207	4.8600e-003	0.0000	15.1421

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**3.6 Paving - 2022****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264
Total	3.2000e-004	2.3000e-004	2.7100e-003	1.0000e-005	8.9000e-004	0.0000	8.9000e-004	2.4000e-004	0.0000	2.4000e-004	0.0000	0.7196	0.7196	2.0000e-005	2.0000e-005	0.7264

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2272	7.0034	1.4894	0.0294	0.9729	0.0810	1.0539	0.2810	0.0775	0.3586	0.0000	2,844.5878	2,844.5878	0.0415	0.4252	2,972.3280
Unmitigated	0.2272	7.0034	1.4894	0.0294	0.9729	0.0810	1.0539	0.2810	0.0775	0.3586	0.0000	2,844.5878	2,844.5878	0.0415	0.4252	2,972.3280

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Parking Lot	0.00	0.00	0.00		
General Heavy Industry	298.22	298.22	298.22	2,171,049	2,171,049
Total	298.22	298.22	298.22	2,171,049	2,171,049

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
General Heavy Industry	20.00	20.00	20.00	59.00	28.00	13.00	100	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.567723	0.056525	0.181671	0.112876	0.021280	0.005063	0.013338	0.012650	0.000820	0.000591	0.024621	0.000324	0.002519
General Heavy Industry	0.000000	0.000000	0.000000	0.000000	0.000000	0.000000	0.500000	0.500000	0.000000	0.000000	0.000000	0.000000	0.000000

5.0 Energy Detail

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	868.7021	868.7021	0.0393	8.1300e-003	872.1059
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	868.7021	868.7021	0.0393	8.1300e-003	872.1059
NaturalGas Mitigated	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
NaturalGas Unmitigated	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.2 Energy by Land Use - Natural Gas****Unmitigated**

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	9.51596e+006	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

Mitigated

	Natural Gas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	9.51596e+006	0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0513	0.4665	0.3918	2.8000e-003		0.0355	0.0355		0.0355	0.0355	0.0000	507.8079	507.8079	9.7300e-003	9.3100e-003	510.8256

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**5.3 Energy by Land Use - Electricity****Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	2.87764e+006	837.1382	0.0379	7.8300e-003	840.4183
Parking Lot	108500	31.5639	1.4300e-003	3.0000e-004	31.6876
Total		868.7021	0.0393	8.1300e-003	872.1059

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	2.87764e+006	837.1382	0.0379	7.8300e-003	840.4183
Parking Lot	108500	31.5639	1.4300e-003	3.0000e-004	31.6876
Total		868.7021	0.0393	8.1300e-003	872.1059

6.0 Area Detail

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Unmitigated	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2084					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.5326					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.9000e-004	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Total	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.2084					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.5326					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.9000e-004	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221
Total	1.7421	1.0000e-004	0.0107	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0208	0.0208	5.0000e-005	0.0000	0.0221

7.0 Water Detail**7.1 Mitigation Measures Water**

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	171.0620	2.9249	0.0702	265.1165
Unmitigated	171.0620	2.9249	0.0702	265.1165

7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	89.5631 / 1.63468	171.0620	2.9249	0.0702	265.1165
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		171.0620	2.9249	0.0702	265.1165

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**7.2 Water by Land Use****Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	89.5631 / 1.63468	171.0620	2.9249	0.0702	265.1165
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		171.0620	2.9249	0.0702	265.1165

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	97.4864	5.7613	0.0000	241.5185
Unmitigated	97.4864	5.7613	0.0000	241.5185

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Applied**8.2 Waste by Land Use****Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	480.25	97.4864	5.7613	0.0000	241.5185
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		97.4864	5.7613	0.0000	241.5185

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	480.25	97.4864	5.7613	0.0000	241.5185
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		97.4864	5.7613	0.0000	241.5185

9.0 Operational Offroad

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	4	50	2100	0.73	Diesel
Emergency Generator	1	4	50	800	0.73	Diesel

Boilers

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

Equipment Type	Number
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10.1 Stationary Sources**Unmitigated/Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	tons/yr										MT/yr					
Emergency Generator - Diesel (750 - 9999 HP)	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091
Total	0.1190	0.5321	0.3034	5.7000e-004		0.0175	0.0175		0.0175	0.0175	0.0000	55.2156	55.2156	7.7400e-003	0.0000	55.4091

11.0 Vegetation

25550 Clawiter Road Industrial Project - Updated Analysis Trucks - Alameda County, Annual

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

Letter 1

COMMENTER: Ellison Folk of Shute, Mihaly, and Weinberger LLP on behalf of the San Francisco Bay Chapter of the Sierra Club

DATE: October 25, 2021

Response 1.1

The commenter expresses an opinion that the IS-MND inadequately analyses criteria air pollutant emissions from construction activities. Specifically, the commenter suggests that the export of demolition and materials and import of 552 cubic yards of fill material import was not accounted for in truck trips. Additionally, the commenter opines that the default construction schedule was reduced without substantial evidence supporting the reduction in construction time and further should have doubled the default equipment onsite due to the reduction in construction schedule.

The commenter is correct that the proposed project would require demolition of existing foundation and surface parking areas on the site. However, these materials would be reused on-site and would not generate truck trips to export. Therefore, no truck trips were incorporated into the air quality emissions model for demolition, because demolition materials would remain on-site. The IS-MND does not describe the reuse of demolition materials on-site. Accordingly, to provide clarification, page 9 of the IS-MND is revised as follows:

The proposed project would commence with demolition ~~removal~~ of the existing slab foundations and paved parking surfaces. Following demolition ~~and removal~~ of foundations and parking surfaces, the demolished materials would be reused on-site for site preparation activities. Then the project site would be developed with a new industrial campus. The proposed development would consist of two industrial buildings measuring approximately 232,653 square feet and 154,618 square feet, respectively; two employee patios/amenity areas; site landscaping; circulation; stormwater retention areas; and parking. Both buildings would be designed for occupation by industrial uses permitted or conditionally permitted in the IG zoning district, which could consist of, but not be limited to, manufacturing, research and development, e-commerce and logistics, warehouses and distribution, and wholesale establishments. Heavy industrial uses are not proposed. Table 1 summarizes details of the proposed project, and Figure 6 shows the proposed site plan.

The commenter is correct that approximately 552 cubic yards of materials would be imported to the site during construction, as described on page 17 of the IS-MND. Approximately 552 cubic yards of import would result in an estimated total of 69 truck trips over the entire grading phase, based on eight cubic yards per truck load. Sixty-nine truck trips would result in a maximum increase in pollutant emissions of 0.33 pounds per day (lbs/day) as shown in Table 1, below. Adding that to the maximum emissions during the grading phase, shown below in Table 1, would result in daily emissions below the regulatory thresholds. Additionally, only NOx emissions from criteria pollutants would exceed what was reported in the IS-MND and that exceedance is only 0.27 lbs/day which is within the margin of error, as shown below in Table 1. Therefore, while haul trucks were omitted from the analysis in the IS-MND, this omission does not change the significance findings as presented in the IS-MND and would result in no significant impacts. The CalEEMod results indicating the emissions from the haul trucks are included in Appendix 1 to this RTC document.

City of Hayward
25450-25550 Clawiter Road Industrial Project

Table 1 Project Construction Emissions with Haul Truck Trips for Fill Import

Year	Daily Emissions (lbs/day)					
	ROG	NO _x	CO	PM ₁₀ (exhaust)	PM _{2.5} (exhaust)	SO _x
Haul Truck Emissions						
Haul Truck Emissions	0.01	0.33	0.07	0.00	0.00	0.00
Analysis – Grading	4.26	46.39	31.41	1.99	1.83	0.06
Revised Total	4	47	31	2	2	0
IS-MND Analysis						
Maximum Daily Emissions ¹	39	46	44	11	6	<1
BAAQMD Thresholds (average daily emissions)	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

¹ See Table 2.1 “Overall Construction-Unmitigated” emissions. CalEEMod worksheets in Appendix C. Emission data presented is the highest of winter or summer outputs.

N/A = not adopted (The BAAQMD has not adopted thresholds for construction emissions of CO or SO_x); lbs/day = pounds per day; ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{2.5} = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM₁₀ = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; SO_x = oxides of sulfur

While the addition of haul trucks to the construction emissions would exceed no thresholds of significance and no revisions to the IS-MND are required, for purposes of clarification, Table 6 on page 35 of the IS-MND is revised as follows:

Table 1 Project Construction Emissions

Year	Daily Emissions (lbs/day)					
	ROG	NO _x	CO	PM ₁₀ (exhaust)	PM _{2.5} (exhaust)	SO _x
Maximum Daily Emissions ¹	39	<u>46 47</u>	44	11	6	<1
BAAQMD Thresholds (average daily emissions)	54	54	N/A	82	54	N/A
Threshold Exceeded?	No	No	N/A	No	No	N/A

¹ See Table 2.1 “Overall Construction-Unmitigated” emissions. CalEEMod worksheets in Appendix C. Emission data presented is the highest of winter or summer outputs. Maximum daily emissions also include exhaust from truck trips needed for soil import during grading. For haul truck emissions see CalEEMod worksheet provided in Appendix 1 to the Responses to Comments document.

N/A = not adopted (The BAAQMD has not adopted thresholds for construction emissions of CO or SO_x); lbs/day = pounds per day; ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{2.5} = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM₁₀ = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; SO_x = oxides of sulfur

With respect to the change in the default construction schedule, the construction schedule was modeled based on the construction schedule provided by the project applicant as indicated on page 17 of the IS-MND and included below. The applicant-provided information and schedule, provided on page 17 of the IS-MND, represents more accurate conditions for the project rather than default construction phasing lengths provided in CalEEMod.

The commenter also suggests that the analysis is inaccurate due to the reduction of construction phase length while maintaining the onsite default equipment usage. As stated in the CalEEMod user guide, “The South Coast AQMD construction survey is used to estimate default equipment lists based on total project acreage as calculated from the acreage entered on the land use screen.”¹ As noted in the CalEEMod user guide, the default daily construction equipment is based on the acreage of the site being developed and not the specific size of the development or the length of the construction phase. This is based on the amount of equipment that can be comfortably operated in a given space at a given time. Additionally, the equipment represents a maximum emissions day and is not anticipated to be representative of every day of construction activity. The CalEEMod defaults were based on “... a survey of construction sites conducted by the South Coast Air Quality Management District (South Coast AQMD). The construction survey data is grouped by construction phase and lot acreage...”² Therefore, regardless of the length of each construction phase, the default construction equipment per phase would be accurate based on the size of the development site. Specifically with respect to this project, since a portion of the site is already developed, this restricts the available space for onsite equipment to operate, further supporting the use of the default equipment list which was designed for the development of a fully vacant site at this size. Accordingly, the IS-MND accurately and adequately analyzes the potential air pollutant emissions of the project. As described in the Air Quality section of the IS-MND, the potential air quality impacts of the project would be less than significant. No further or additional revisions to the IS-MND are required in response to this comment.

Response 1.2

The commenter states an opinion that the transportation analysis for the project is insufficient for an ecommerce use and that VMT and NO_x emissions are substantially underestimated. In addition, the commenter provided their own analysis of NO_x emissions as an attachment to the letter. From this analysis the commenter determined that use of the site as a fulfillment center would likely result in a substantial increase in VMT and NO_x emissions during peak-season shopping months.

This comment is related to the project site being developed as an Amazon Last Mile Facility or similar ecommerce site, which is addressed in the Topical Response in Section 2.1. As described therein, an Amazon last-mile facility or similar ecommerce use is not proposed; the project would involve warehouse, manufacturing, or other permitted industrial uses. Establishment of an Amazon last-mile facility or similar ecommerce use at the project site would be subject to a separate Conditional Use Permit and environmental review and approval process. Accordingly, no revisions to the IS-MND are necessary in response to this comment.

¹ California Air Pollution Control Officers Association (CAPCOA), *California Emissions Estimator Model Appendix A Calculation Details for CalEEMod*. May 2011 CalEEMod Version 202.4.0. pg. 6.

² California Air Pollution Control Officers Association (CAPCOA), *California Emissions Estimator Model User Guide*. May 2011 CalEEMod Version 202.4.0. pg. 31.

Response 1.3

The commenter expresses an opinion that the IS-MND substantially underestimates the GHG emissions from vehicle trips generated by the project because a warehouse use was evaluated rather than an ecommerce use. This commenter also expresses an opinion that the successful implementation of Mitigation Measure GHG-1 is speculative and therefore the GHG impacts of the project should be considered significant and unavoidable. The commenter bases this assessment on the emission levels they provided for an ecommerce building as well as inaccurately stating that Mitigation Measure GHG-1 hinges on the availability of carbon offset credits.

As detailed in the Topical Response, the project is not intended to be an Amazon last-mile facility or similar ecommerce use and instead would be operated as warehouses. Nonetheless, the IS-MND evaluates the GHG emissions impacts of the proposed project using two scenarios. One scenario analyzed could result in the location of a last mile delivery center at the site and the other scenario would operate as a transitional warehousing, distribution and manufacturing use. In both scenarios, the proposed development resulted in potentially significant GHG impacts.

To mitigate GHG emissions impacts to a level of less than significant, the applicant must implement Mitigation Measure GHG-1: Greenhouse Gas Reduction Plan as detailed on page 72 and 73 of the IS-MND. After implementing on-site GHG emissions reductions such as use of all electric appliances, ensuring all electricity is from renewable sources, implementation of a Transportation Demand Management (TDM) program for workers, and other measures, the applicant may implement off-site measures such as undertaking or funding activities that reduce or sequester GHG emissions or purchase carbon offsets. With implementation of Mitigation Measure GHG-1, the GHG related impacts would be reduced to a level of less than significant.

Mitigation Measure GHG-1 includes the use of off-site carbon offsets as an option but does not indicate that it has to be implemented. Additionally, as stated in the first paragraph of Mitigation Measure GHG-1, "Potential options include, but would not be limited to..." the reduction scenarios identified. Therefore, while carbon offsets can be used if available, the project applicant has the flexibility to implement any GHG reduction options available to them that would offset GHG emissions either onsite or offsite. Therefore, Mitigation Measure GHG-1 includes sufficient measures to reduce the GHG emissions as reported to less than significant levels. No revisions to the IS-MND are necessary in response to this comment.

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October 25, 2021

Via E-Mail

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Re: Mitigated Negative Declaration for 25450-25550 Clawiter Road
Industrial Project

Dear Ms. Schmidt:

On behalf of the San Francisco Bay Chapter of the Sierra Club, we have reviewed the Initial Study/Mitigated Negative Declaration (“MND”) prepared in connection with the proposed 25450-25550 Clawiter Road Industrial Project (“Project”). Sierra Club has serious concerns about the environmental impacts of the Project as currently proposed and the adequacy of the MND. In particular, the MND substantially understates and fails to analyze the severity and extent of a range of environmental impacts, including potentially significant effects, related to air quality, greenhouse gas emissions, and traffic. As a result, the MND for the Project violates the minimum standards of adequacy under the California Environmental Quality Act (“CEQA”), Public Resources Code § 21000 et seq., and the CEQA “Guidelines,” California Code of Regulations, title 14, § 15000 et seq. Based on the evidence presented, All of these impacts must be more fully addressed before the City may approve the Project.

2.1

In addition to these comments, we are submitting under separate cover an analysis prepared by Baseline Environmental Consulting (“Baseline Report”). This report is incorporated herein by reference. Please refer to this report for further detail and discussion of the MND’s inadequacies with regard to impacts to air pollution and related health risks. We request that the City respond to both the comments in this letter and to each of the comments in the Baseline Report.

Ms. Leigha Schmidt
 October 25, 2021
 Page 2

I. The MND Fails to Adequately Describe the Project.

In order for the MND to adequately evaluate the environmental ramifications of a project, it must first provide a comprehensive description of the project itself. *See San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal. App. 4th 713, 730; *County of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193). Furthermore, “[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” *Id.* at 730 (citation omitted). Here, the MND provides only the most general description of the proposed project. Because the Project is so ill-defined, the MND’s analysis of significant environmental impacts inherently unreliable.

2.2

The MND’s lack of detail is exacerbated by the fact that, at a meeting of the City Council’s Economic Development Committee in May, 2021, the Project was described as a proposed Amazon Last Mile Delivery Station. According to that meeting, the Project would consist of one building totally 232,653 square feet and include 350-450 operational jobs and would operate 24-hours a day, seven days a week. Packages would be delivered to the site from fulfillment centers in long haul trucks, packages would be sorted in several shifts, and then delivery vans would leave the site in staggered waves to deliver packages directly to customers and return to the site eight to ten hours later. Truck trips and package delivery trips would increase seasonally around the holidays. May 27, 2021 Staff Report for Council Economic Development Committee, p.2 (Exhibit A).

2.3

None of this detail appears in the MND or the supporting traffic analysis, and in fact, the Project analyzed in the MND now includes two buildings (232,653 and 154,618 square feet). It is unclear whether the Project has been revised again. Regardless, because an accurate description of the proposed project’s environmental impacts is essential to evaluating its environmental impacts, the MND must be revised to more accurately describe the project. In particular, the type of use that will occur on the project site is particularly important to evaluating the air quality and transportation impacts of the project. As detailed below and in the accompanying letter from Baseline Associates, an accurate assessment of the proposed use demonstrates the project will have significant impacts not disclosed by the MND. These impacts require preparation of an environmental impact report.

II. The Project’s Potentially Significant Impacts Require Preparation of an EIR.

It is well settled that CEQA establishes a “low threshold” for initial preparation of an EIR, especially in the face of conflicting assertions concerning the possible effects of a proposed project. *Pocket Protectors v. City of Sacramento* (2005)

Ms. Leigha Schmidt
 October 25, 2021
 Page 3

124 Cal.App.4th 903, 928. CEQA provides that a lead agency may issue a negative declaration and avoid preparing an EIR only if “[t]here is *no* substantial evidence, in light of the whole record before the lead agency, that the Project may have a significant effect on the environment.” Pub. Resources Code § 21080(c)(1) (emphasis added). A lead agency may adopt a mitigated negative declaration only when all potentially significant impacts of a project will be avoided or reduced to insignificance. *Id.* § 21080(c)(2); Guidelines § 15070(b). A mitigated negative declaration will also be set aside if the proponent’s conclusions are not based on substantial evidence in the record. See *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.

An initial study must provide the factual basis, with analysis included, for making the determination that no significant impact will result from the project. Guidelines § 15063(d)(3). In making this determination, the agency must consider the direct and indirect impacts of the project as a whole (Guidelines § 15064(d)), as well as the project’s cumulative impacts. See *City of Antioch v. City Council of Pittsburg* (1986) 187 Cal.App.3d 1325, 1332-33.

An agency must prepare an EIR whenever it is presented with a “fair argument” that a project *may have* a significant effect on the environment, even if there is also substantial evidence to indicate that the impact is not significant. See *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75; see also *Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988; Guidelines § 15064(f)(1). Where there are conflicting opinions regarding the significance of an impact, the agency *must* treat the impact as significant and prepare an EIR. *Stanislaus Audubon Society v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 150-51; Guidelines § 15064(f)(1).

Based on what information is known about the Project, the City must prepare an EIR because, as set forth below, there is a fair argument that the Project will cause significant impacts related to traffic and air quality. A revised environmental document must include a detailed and thorough analysis of the Project’s likely impacts to permit informed decisions about the Project, and identify effective mitigation measures and alternatives that could reduce these impacts.

2.4

Ms. Leigha Schmidt
 October 25, 2021
 Page 4

A. The MND's Air Quality Analysis Is Inadequate, and There Is a Fair Argument that the Project May Have Significant Air Quality Impacts.

1. The MND Fails to Accurately Describe the Project's Setting in Relation to Sensitive Receptors.

The MND fails to present important contextual information related to air quality conditions on the Project site and in the vicinity. Accurate and complete information pertaining to the setting of the Project and surrounding uses is critical to an evaluation of a Project's impact on the environment. *San Joaquin Raptor/Wildlife Center*, 27 Cal.App.4th at 728; see also *Friends of the Eel River v. Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 875 (incomplete description of the Project's environmental setting fails to set the stage for a discussion of significant effects). Here, the MND's deficiencies in describing the Project's setting undermine its adequacy as an informational document.

2.5

The MND notes that a school and a residential neighborhood are located within .2 miles from the Project site. The Project site is also in an area that is in the 80th percentile of communities that are considered overburdened by environmental hazards. See Exhibit B. Thus, it is particularly important that the MND evaluate the air quality and health impacts of the proposed project on these sensitive receptors. In fact, CEQA requires an EIR to discuss the specific human health effects that would occur as a result of a project's significant air pollutant emissions. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 517-522. However, the MND's analysis of toxic air contaminants and their health risks addresses only the increased cancer risk caused by stationary sources—diesel generators. MND at p. 40. The MND fails to consider other health impacts from NOx and particulate matter.

Moreover, even though the diesel truck traffic generated by the anticipated warehouse uses would be substantial and poses significant health risks, the MND provides no analysis of the health risks of this increased truck traffic on nearby sensitive receptors. The traffic study indicates that fifty percent of vehicle trips from the Project will pass through the nearby residential neighborhood. Kittleson Traffic Analysis, Figure 9. The MND must assess the health impacts of this additional traffic—much of which can be expected to be diesel trucks—on these sensitive receptors.

2.6

The adverse impacts from increased air pollution, including both NOx and particulate matter extend beyond the increased cancer risk assessed in the MND. Residents in this area experience asthma and other respiratory illnesses at far higher rates than less burdened communities. See Exhibit B. Given CEQA's mandate to consider the

Ms. Leigha Schmidt
 October 25, 2021
 Page 5

health effects of increased air pollutant emissions, the MND must be revised to assess the full range of potentially significant health impacts resulting from the Project.

2. The MND Underestimates the Project's Operational NOx Impacts, Which Are Potentially Significant.

In addition to underestimating operational impacts to sensitive receptors, the MND underestimates the Project's nitrogen oxide (NOx) emissions. NOx is a common criteria air pollutant of concern for warehouse projects due to the high volume of diesel truck trips generated by facility operations. *See* Baseline Report. Accurate modeling of NOx emissions is critical to understanding environmental and health impacts because NOx is a "a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation." Warehouse Best Practices at pg. 2 (Exhibit C). However, as more fully discussed the Baseline Report, which will be submitted under separate cover, the MND dramatically underestimates the Project's NOx emissions from vehicle trips. Properly modeled, the Project's NOx emissions exceed the significance criteria established by BAAQMD.

2.7

The Project's NOx emissions alone demonstrate a fair argument that the Project may have a significant environmental impact requiring preparation of an EIR.

3. The MND Employs Faulty Construction Equipment Assumptions.

The MND improperly omits key sources of air pollution in its analysis of construction related air emissions. As noted in the Baseline analysis, the MND fails to include air emissions from any haul trips associated with construction. The MND also assumed a substantially reduced building construction schedule without explanation for how the Project would achieve this schedule without increasing the intensity of daily equipment use. Therefore, additional project analysis is required to evaluate potential air quality impacts related to haul trucks and equipment use during construction to determine if mitigation is required.

2.8

B. The MND Fails to adequately disclose or mitigate GHG Emissions from the Project.

Reducing GHG emissions to minimize the harms from climate change is one of the most urgent challenges of our time. Scientific evidence continues to mount that we are not only facing a true climate crisis, but also rapidly running out of time to confront it. The law is clear that lead agencies must thoroughly evaluate a project's

Ms. Leigha Schmidt
 October 25, 2021
 Page 6

impacts on climate change under CEQA, and identify and adopt feasible mitigation measures to address project-specific or cumulative impacts. *See Communities for a Better Env't v. City of Richmond* (2010) 184 Cal.App.4th 70, 89-91; CEQA Guidelines § 15064.4. The GHG analysis suffers from several critical flaws as detailed below.

1. Any GHG emissions over existing conditions should be considered significant.

The MND relies on a GHG significance threshold of 660 MT of CO₂e per year. MND at 70. This threshold represents a 40% reduction of the Bay Area Air Quality Management District's ("Air District") 1,000 MT of CO₂e originally adopted in 2010. The Air District's threshold was designed to apply statewide GHG emission reductions goals to the Bay Area. However, even with the reduction proposed by the MND, it is not reasonable to assume that the Air District's GHG thresholds adopted in 2010 are still relevant or supported by substantial evidence in view of new information about the severity of climate change and the need to reduce GHG emissions immediately and as much as possible. Indeed, the Air District has noted that "since 2010 the urgent risks to public health and air quality posed by global climate change continues to come into focus and prominence." <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Therefore, the Air District is in the process of updating its significance thresholds to reflect evolving science and legal decisions.

Moreover, as the Supreme Court found in *Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204 ("Newhall Ranch"), it may not make sense to translate a general standard (in that case AB 32's requirement to reduce emissions to 1990 levels by 2020) to a specific project. In fact, *Newhall Ranch* noted that new projects—such as this Project—may require a greater level of reduction because "[d]esigning new buildings and infrastructure for maximum energy efficiency and renewable energy use is likely to be easier, and is more likely to occur, than achieving the same savings by retrofitting of older structures and systems." 62 Cal.4th at 226.

Since 2010, it has become clear from a scientific perspective that any additional GHG emissions will contribute to a serious and growing climate crisis. *See e.g.* https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf. Recognizing this reality, in 2018 Governor Brown signed Executive Order 55-18 calling for the state to achieve carbon neutrality as soon as possible and no later than 2045. <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>. Given these facts on the ground, the MND should establish a net zero threshold for new emissions. *See e.g.*, CARB 2017 Scoping Plan at 101 ("Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts,

2.9

Ms. Leigha Schmidt
 October 25, 2021
 Page 7

is an appropriate overall objective for new development.”)

https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery

The MND does not discuss EO 55-18 nor does it explain why this new project should not be judged by a significance threshold requiring no net increase in GHG emissions. Finally, even assuming it is appropriate to rely on an adjusted GHG threshold tied to the Air District’s 2010 threshold, the MND fails to account for the fact that the Project’s life span will be 30 years. MND at 70. Therefore, under the MND’s approach, the adjusted significance threshold should be lowered to 220 MTCO₂e, which represents an 80 percent reduction in GHG emissions from 1990 levels by 2050.

2. The MND underestimates vehicle trips generated by the Project and vehicle miles traveled.

The Project would result in a substantial increase in vehicle traffic. Therefore, an accurate assessment of trips generated by the Project and vehicle miles travelled is critical to ensuring the Project’s GHG emissions have been identified and fully mitigated. However, as noted in the Baseline report, the MND substantially underestimates the vehicle trips from the Project. As a result, the MND’s projection of GHG emissions and required mitigation is also too low. Because the MND fails to accurately calculate the Project’s GHG emissions, it violates CEQA’s requirement to disclose and analyze a project’s potentially significant GHG emissions. *Newhall Ranch*, 62 Cal.4th at 226; CEQA Guidelines § 15064.4.

2.10

3. The MND does not adequately mitigate GHG impacts.

The MND fails to demonstrate that measures relied upon to reduce GHG emissions will actually reduce emissions and be enforceable. For example, the MND proposes that the Project’s GHG emissions be reduced by 50 percent through on-site mitigation. MND at 72. However, the MND does nothing to quantify the expected reductions from the mitigation measures proposed—such as building electrification or reliance on renewable energy. Moreover, the MND does not clarify how the requirement to use only electric appliances is consistent with the Project description, which indicates that natural gas will be used for heating and cooling. *See* MND at 55. The MND also fails to provide sufficient evidence demonstrating that carbon offsets will be available and enforceable.

2.11

CEQA does not allow mitigation fees unless there is substantial evidence of a functioning, enforceable, and effective implementation program. Courts have found

2.12

Ms. Leigha Schmidt
 October 25, 2021
 Page 8

mitigation fees inadequate where the amount to be paid for traffic mitigation was unspecified and not “part of a reasonable, enforceable plan or program” (*Anderson First Coalition*, 130 Cal.App.4th at 1189); where a proposed urban decay mitigation fee contained no cost estimate and no description of how it would be implemented (*Cal. Clean Energy Com. v. City of Woodland* (2014) 225 Cal.App.4th 173, 198); and where there was no specific traffic mitigation plan in place that would be funded by mitigation fees (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1122). Mitigation must be enforceable through permit conditions, agreements, or other legally-binding instruments. *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 506 (citing Pub. Resources Code, § 21081.6(b)).

In the context of carbon offset credits, that generally means credits must be “real, permanent, quantifiable, verifiable, enforceable, and additional to any GHG emission reduction otherwise required by law or regulation, and any other GHG emission reduction that otherwise would occur.” *Id.* While the MND pays lip service to the idea that any offsets must be real, permanent, and quantifiable, it provides no evidence that the offset program would be enforceable or actually achieve these goals. Where a fair argument can be made that mitigation measures may not be effective, an EIR must be prepared.

2.12

Because of these known problems with enforcement and efficacy, agencies typically permit offsets to constitute only a very small part of an overall emission reduction program. For example, California’s cap and trade program allows no more than eight percent of GHG reductions to come from offsets, which will drop to four percent in 2021, at which point at least half of the offsets used “provide direct environmental benefits in state.” Health & Saf. Code § 38562(c)(2)(E). The MND’s assumption that 50% of GHG reductions can be achieved through offsets conflicts with established policy that reflects the inherent unreliability of such offsets. Because the MND cannot demonstrate that GHG emissions will be adequately mitigated, the City must require preparation of an EIR before the Project may be approved.

C. The MND Fails to Adequately Address Transportation Impacts.

The MND fails to conduct any analysis of the vehicle miles that would be generated by the Project. MND at 124. Instead, the MND maintains that such an analysis is not required under the “employment-industrial” screening metric used by the City to evaluate project VMT. Kittleson Traffic Study at 27. However, an employment density metric does not reflect the potential impacts of a warehouse delivery project—the type of project that is most likely to be built at the Project site. Warehouse delivery projects generate substantial vehicle mileage, far more than would be generated by employee trips

2.13

Ms. Leigha Schmidt
 October 25, 2021
 Page 9

alone. An accurate assessment of vehicle mileage from the Project is essential to evaluating air quality and GHG impacts, in addition to transportation impacts. The MND cannot rely on a screening threshold that fails to reflect the actual impacts of the project under consideration. *Protect Niles v. City of Fremont* (2018) 25 Cal.App.5th 1129, 1152 (“Thresholds of significance may not be applied in a way that forecloses the consideration of any other substantial evidence showing there may be a significant effect.”) (internal quotations and citation omitted).

2.13

The vehicle trips generated by this Project will also have substantial impacts on water quality and wildlife. In particular, studies have reported that tires release the chemical 6PPD-quinone, which has been linked to the deaths of salmonids. <https://www.science.org/content/article/common-tire-chemical-implicated-mysterious-deaths-risk-salmon>. Tire waste from trucks serving this facility will wash into San Francisco Bay and adversely impact an already fragile ecosystem and will undermine efforts to restore salmon populations in the Bay. <https://www.insider.com/california-release-salmon-into-sf-bay-boost-fishing-industry-2021-6>. These impacts should analyzed and mitigated before the Project may be approved.

2.14

D. The MND fails to address cumulative project impacts.

CEQA requires a discussion of the environmental impacts, both direct and indirect, of the proposed project in combination with all “closely related past, present and reasonably foreseeable probable future projects.” Guidelines § 15355(b); *see also* Pub. Res. Code § 21083(b); Guidelines §§ 15021(a)(2), 15130(a), 15358. “[E]nvironmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact.” *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1214. A lead agency must prepare an EIR if a project’s possible impacts, though “individually limited,” may be “cumulatively considerable.” Pub. Res. Code § 15064(i).

2.15

The Project here would undeniably contribute to the cumulative impact of surrounding industrial projects. Specifically, at least 4 other projects are proposed in close proximity to the proposed Project. See Exhibit D (Planning Agenda identifying other industrial/warehouse projects in eastern Hayward.) Some of these projects could generate substantial vehicle traffic, including diesel truck traffic. Although the MND’s health risk assessment addresses the impacts of stationary sources from the Duke Industrial Project, it does not address health impacts, air pollution impacts, GHG emissions, or transportation impacts from vehicle traffic from any of these projects.

Ms. Leigha Schmidt
October 25, 2021
Page 10

By focusing on *only* the Project's impacts, the MND fails to determine whether many purportedly small impacts of neighboring projects would "appear startling" once combined. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721. Additional analysis is required to evaluate the cumulative health risks to nearby residences due to the high volume of diesel truck traffic that would be generated by the Project and other planned and existing warehouse and distribution facilities in the vicinity of the proposed project.

2.15

III. Conclusion

As set forth above, the MND does not come close to satisfying CEQA's requirements. At a fundamental level, it fails to describe the Project setting and fails to provide a complete analysis of Project impacts and feasible mitigation measures. At the same time, ample evidence demonstrates that a fair argument exists that the Project may result in significant environmental impacts. In light of this evidence, CEQA requires that an EIR be prepared.

2.16

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Ellison Folk

Attachments

1429038.2

EXHIBIT A



DATE: May 27, 2021

TO: Council Economic Development Committee

FROM: Assistant City Manager/Development Services Director

SUBJECT Preliminary Concept Review: Proposed Amazon Last Mile Delivery Use at 25450-25550 Clawiter Road (Former Berkeley Farms Site)

RECOMMENDATION

That CEDC members provide feedback to Dermody Properties, the entity that is currently redeveloping the former Berkeley Farms site, and Amazon Logistics, the potential tenant, regarding the redevelopment of the site and use of the building as an Amazon Last Mile Delivery Station.

SUMMARY

The concept review of preliminary project proposals is a service offered through the Economic Development Program and is targeted for major developments or redevelopments where upfront feedback would provide valuable information for prospective developers and businesses. Representatives of Dermody Properties, the entity currently redeveloping the former Berkeley Farms site, and Amazon Logistics requested an opportunity to introduce their concept for the former Berkeley Farms site and to receive CEDC feedback before moving forward with finalizing the entitlement plans and related environmental analysis and submitting an application for a Conditional Use Permit (CUP).

BACKGROUND

On October 6, 2020, Dermody Properties submitted a Master Site Plan Review and Conditional Use Permit application to develop a new industrial campus on the former Berkeley Farms site. The approximately 20.64-acre site is currently vacant except for foundation slabs that would be removed as part of the proposed project. The original entitlement consists of two industrial buildings measuring 232,653 square feet and 154,618 square feet, two employee patios/amenity areas, site landscaping, circulation, and parking (Attachment II). According to the project description, end tenants were not identified at the time of application submittal; however, the applicant noted that the industrial campus with amenities is designed to attract information and technology-based users. The application was deemed complete on March 23, 2021. The Initial Study/Mitigated Negative Declaration is slated to be released for a 20-day public comment period starting in June 2021.

On May 10, 2021, Dermody Properties provided a revised site plan and operational summary for an Amazon Last Mile Delivery station at the site. The revised site plan (Attachment III) would include development of one 232,290-square-foot building and the rest of the site would be used for surface parking, circulation and one employee amenity area. The proposed Amazon Last Mile Delivery Station would operate identically to the use proposed at 2701 W. Winton Avenue except vehicle parking would be located outside of the building, and there would be 350-450 operational jobs associated with this site. The use would operate 24-hours a day, seven days a week. Packages would be delivered to the site from fulfillment centers in long haul trucks, packages would be sorted in several shifts, and then delivery vans would leave the site in staggered waves to deliver packages directly to customers and return to the site eight to ten hours later. There would be seasonal increases in truck trips and package delivery trips around the holidays.

The purpose of this work session is to allow the developer and potential end user to provide CEDC members an understanding of what is being proposed and to offer the CEDC an opportunity to provide high-level feedback as to whether or not the proposed redesign of the site and use would meet CEDC's goals for the industrial area. This is not to be considered by either the CEDC or the project proponents as a formal "approval" or "denial" of the project, as this is not a formal application.

DISCUSSION

Since the proposed use is in a preliminary phase, Amazon has not prepared or submitted a formal CUP application and Dermody's revised site plan does not contain enough information to determine full consistency with the Industrial District regulations or the applicable Design Guidelines. However, it is important to note that the entitlement package originally submitted in October 2020 and deemed complete in March 2021 is consistent with the applicable development standards and design guidelines and reflects the City's vision for an industrial campus. However, according to Dermody, the tenants that they have identified for the project site are low intensity, low employment warehouse and third-party logistics firms whereas Amazon would be a high employment generator.

When staff asked Dermody if there is a phasing plan and intent to build out the site in accordance with the plans currently under review, Dermody indicated that the second building would not be constructed until Amazon vacates the premises. The initial lease term for Amazon would be 10 to 12 years with options to stay beyond that timeframe. If Amazon vacates the premises and the next tenant does not need a parking lot/yard, the owner of the property at that time would be required to process the necessary entitlements to develop the second building.

Given the proposed use at this site is identical to that proposed at 2701 W. Winton Avenue, a number of concerns have been raised through staff analysis and Planning Commission evaluation of the W. Winton proposal. These include but are not limited to: 1) concerns pertaining to the generation of high volume of traffic; 2) the resulting significant wear and tear on City's roadways from a mix of line-haul trucks, delivery vans, and passenger vehicles; 3) the green-house gas generation associated with increased traffic; and 4) the potential

unpredictable increases in traffic volume associated with peak online sales during the holidays and Amazon Prime Day.

The following identifies potential policy-related questions to guide the discussion:

1. If the Amazon Last Mile Delivery Station is approved at 2701 W. Winton, is the City supportive of a second location at this site?
2. Is the proposed concept consistent with the character and integrity of the CEDC's vision for the site and surrounding area?
3. Does the CEDC have specific concerns regarding public health, safety, traffic, infrastructure degradation, or general welfare?
4. Does the CEDC have suggested elements that the project proponents could incorporate into the project to minimize potential impacts to achieve the CEDC's vision?

ECONOMIC IMPACT

The proposed development would have a positive economic benefit in that it would result in redevelopment of a currently vacant site with an Amazon last mile delivery center.

According to the applicant's submittal materials, the project would result in approximately 350-400 operational jobs once the site is active. Full-time employees would receive an average hourly wage of \$15 and a comprehensive benefits package including health insurance. Part time employees would receive \$15 per hour and funding toward health insurance as well as other benefits such as life, disability, dental and vision insurance. Amazon FLEX drivers, who are classified as contract employees, would make between \$18 and \$25 per hour.

Additionally, Amazon representatives have verbally indicated to Economic Development staff that the company would like to increase their involvement in the Hayward community, including exploring new programs such as expanded STEM education initiatives with Hayward Unified, entrepreneurship programs for minority-owned startups, and assisting local brick and mortar small businesses access to the online marketplace.

FISCAL IMPACT

The proposed use would not generate sales tax in the City; however, drivers of the Amazon fleet vans and FLEX drivers would pay sales tax on gasoline purchases and occupation of the site would result in an increase in utility users tax and property taxes, which would contribute to General Fund revenues.

As described in detail in the staff report to Planning Commission prepared for the proposed Amazon Last Mile Delivery Station at 2701 W. Winton Avenue, the proposed use on this site would also generate a high volume of traffic and result in significant wear and tear on City's

roadways from a mix of line-haul trucks, delivery vans, and passenger vehicles. Without a complete traffic study, it is not possible to determine the number of trips and associated roadway and pavement impacts and required contributions for the proposed use at this location. However, it is likely that staff would only recommend that the proposed use be approved subject to conditions of approval that require a one-time payment to upgrade infrastructure in the vicinity of the project site as well as an ongoing contribution to off-set impacts to the roadways. To date, Amazon has not agreed to pay these one-time or ongoing infrastructure improvement and maintenance fees.

As described above, under the proposed concept, the developer will not construct the 154,618 square-foot building included in the current entitlement application. There would be financial implications to the General Fund, as a result. Property tax revenues are the City's largest General Fund revenue source, comprising approximately one-third of General Fund revenues. The City's property tax is collected by Alameda County, and the City currently receives approximately 16 percent of the 1 percent countywide real property tax levied. The property tax revenue to the City's General Fund will be less than if there were two complete buildings constructed on the property. Without information on value of the building and associated improvement valuations of the building that would not be constructed, the County Tax Assessor nor staff can project the exact revenue opportunity cost to the City this time.

NEXT STEPS

After the CEDC reviews and provides comments on the concept, the project proponents will determine if they would like to revise the application currently under review and consider preparing a formal CUP application to the City.

Prepared by: Leigha Schmidt, Acting Principal Planner
Paul Nguyen, Economic Development Manager

Recommended by: Jennifer Ott, Assistant City Manager/Development Services Director

Approved by:



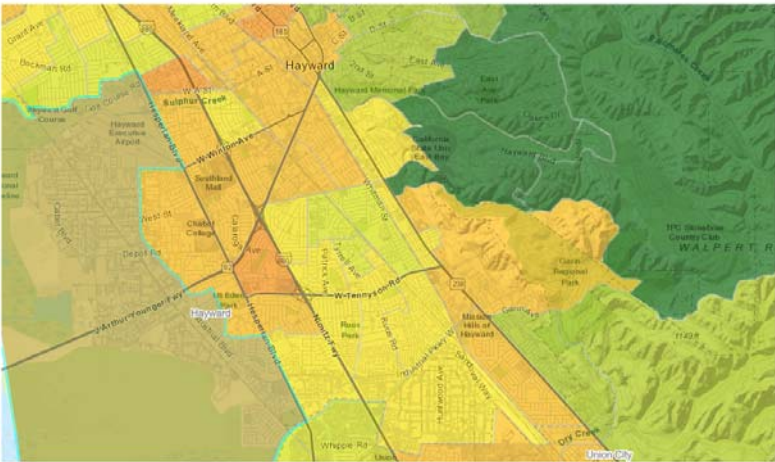
Kelly McAdoo, City Manager

EXHIBIT B

CalEnviroScreen

Legend

CalEnviroScreen 4.0 Results



Census Tract: 6001437101 (Population: 7,867)

The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6001437101 relative to other census tracts.

Overall Percentiles	
CalEnviroScreen 4.0 Percentile	74
Pollution Burden Percentile	80
Population Characteristics Percentile	62
Exposures	
Ozone	12
Particulate Matter 2.5	28
Diesel Particulate Matter	28
Toxic Releases	71
Traffic	85
Pesticides	0
Drinking Water	7
Lead from Housing	31
Environmental Effects	
Cleanup Sites	99
Groundwater Threats	98
Hazardous Waste	99
Impaired Waters	87
Solid Waste	99
Sensitive Populations	
Asthma	90
Low Birth Weight	81
Cardiovascular Disease	78
Socioeconomic Factors	
Education	51
Linguistic Isolation	35
Poverty	35
Unemployment	31
Housing Burden	12

Race/Ethnicity Profiles

Hover your mouse over the pie chart segment to see the race/ethnicity in percentages and approximate counts.

Age Profiles

Hover your mouse over the pie chart segment to see the age characteristics in percentages and approximate counts.

EXHIBIT C

XAVIER BECERRA
Attorney General

State of California
DEPARTMENT OF JUSTICE



Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)¹ regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies, and in rare cases the Bureau has filed litigation to enforce CEQA.² This document builds upon the Bureau's comment letters, collecting knowledge gained from the Bureau's review of hundreds of warehouse projects across the state. It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.³ While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, the overwhelming majority of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.⁴ California, with its ports, population centers, and transportation network, has found itself at the center of this trend. For example, in 2014, 40 percent of national container cargo flowed through Southern California, which was home to nearly 1.2 billion square feet of warehouse facilities.⁵ In the Inland Empire alone, 150 million square feet of new industrial space was built over the last decade,⁶ and 21 of the largest 100 logistics leases signed in 2019 nationwide were in the Inland

¹ <https://oag.ca.gov/environment/justice>.

² <https://oag.ca.gov/environment/ceqa/letters>; *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).

³ Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.

⁴ As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short or long term basis for later distribution to businesses and/or retail customers.

⁵ Industrial Warehousing in the SCAG Region, Task 2. Inventory of Warehousing Facilities (April 2018), http://www.scag.ca.gov/Documents/Task2_FacilityInventory.pdf at 1-1, 2-11.

⁶ Los Angeles Times, *When your house is surrounded by massive warehouses*, October 27, 2019, <https://www.latimes.com/california/story/2019-10-27/fontana-california-warehouses-inland-empire-pollution>.

Empire, comprising 17.5 million square feet.⁷ This trend has not slowed, even with the economic downturn caused by COVID-19, as e-commerce has continued to grow.⁸ Forecasts predict that the Central Valley is where a new wave of warehouse development will go.⁹

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹⁰ Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.¹¹ The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents. These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts.

⁷ CBRE, *Dealmakers: E-Commerce & Logistics Firms Drive Demand for Large Warehouses in 2019* (January 23, 2020), <https://www.cbre.us/research-and-reports/US-MarketFlash-Dealmakers-E-Commerce-Logistics-Firms-Drive-Demand-for-Large-Warehouses-in-2019>; see also CBRE, *E-Commerce and Logistics Companies Expand Share Of Largest US Warehouse Leases*, *CBRE Analysis Finds* (Feb. 25, 2019), <https://www.cbre.us/about/media-center/inland-empire-largest-us-warehouse-leases> (20 of the largest 100 warehousing leases in 2018 were in the Inland Empire, comprising nearly 20 million square feet).

⁸ CBRE, 2021 U.S. Real Estate Market Outlook, Industrial & Logistics, <https://www.cbre.us/research-and-reports/2021-US-Real-Estate-Market-Outlook-Industrial-Logistics>; Kaleigh Moore, *As Online Sales Grow During COVID-19, Retailers Like Montce Swim Adapt And Find Success*, *FORBES* (June 24, 2020), available at <https://www.forbes.com/sites/kaleighmoore/2020/06/24/as-online-sales-grow-during-covid-19-retailers-like-montce-swim-adapt-and-find-success/>.

⁹ New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), available at <https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html>.

¹⁰ California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (NO_x); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (DPM).

¹¹ Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically address warehouse development, we encourage governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and guide sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take any number of forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors can help avoid conflicts between warehouse facilities and residential communities.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.¹²

The Bureau is aware of four good neighbor policies in California: Riverside County, the City of Riverside, the City of Moreno Valley, and the Western Riverside Council of Governments.¹³ These policies provide minimum standards that all warehouses in the jurisdiction must meet. For example, the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors, and it requires a number of design features to reduce truck impacts on nearby sensitive receptors. The Riverside County policy requires vehicles entering sites during both construction and operation to meet certain California Air Resources Board (CARB) guidelines, and it requires community benefits agreements and supplemental funding contributions toward additional pollution offsets.

The Bureau encourages jurisdictions to adopt their own local ordinances and/or good neighbor policies that combine the most robust policies from those models with measures discussed in the remainder of this document.

¹² For more information about SB 1000, see <https://oag.ca.gov/environment/sb1000>.

¹³ <https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf> (Riverside County); <https://riversideca.gov/planning/pdf/good-neighbor-guidelines.pdf> (City of Riverside); http://qcode.us/codes/morenovalley/view.php?topic=9-9_05-9_05_050&frames=on (City of Moreno Valley); <http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=> (Western Riverside Council of Governments).

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The information should be in a format that is easy to navigate and understand for members of the affected community.
- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community relations officer to the surrounding community.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local

communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.¹⁴
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers

¹⁴ California Air Resources Board (CARB), Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted under varying scenarios; this document may be found on CARB's website and is entitled: "California Sustainable Freight Initiative: Concept Paper for the Freight Handbook" (December 2019).

should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as regulations tighten and demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation. CEQA Guidelines § 15369.
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is a baseline expectation.
- Fully analyzing impacts from truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin. Emissions beyond the air basin are not speculative, and, because air pollution is not static, may contribute to air basin pollution. Moreover, any contributions to air pollution outside the local air basin should be quantified and their significance should be considered.
- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable

bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.

- Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.
- Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.
- Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all

dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.

- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.

- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if

truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.

- Using full cut-off light shields and/or anti-glare lighting.
- Using cool pavement to reduce heat island effects.
- Installing climate control in the warehouse facility to promote worker well-being.
- Installing air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

EXHIBIT D



CITY OF HAYWARD

Hayward City Hall
777 B Street
Hayward, CA 94541
www.Hayward-CA.gov

Agenda

Hayward Area Shoreline Planning Agency

Thursday, October 14, 2021

3:00 PM

Remote Participation

SPECIAL HASPA MEETING

A Joint Powers Authority Comprised of the East Bay Regional Park District, the Hayward Area Recreation and Park District, and the City of Hayward.

COVID-19 Notice: Consistent with State of California Executive Order No. 29-20 dated March 17, 2020, and Alameda County Health Officer Order No. 20-10 dated April 29, 2020, the Planning Commission will be participating in public meetings via phone/video conferencing.

Please note that we are now using the Zoom Webinar platform to conduct meetings and receive live public comment.

How to submit written Public Comment:

Send an email to robert.goldassio@hayward-ca.gov by 12:00 p.m. the day of the meeting. Please identify the Agenda Item Number in the subject line of your email. Emails will be compiled into one file, distributed to the HASPA Board of Trustees and Technical Advisory Committee (TAC) staff, and published on the City's Meeting & Agenda Center (<https://hayward.legistar.com/Calendar.aspx>) under Documents Received After Published Agenda. Written comments received after 12:00 p.m. that address an item on the agenda will still be included as part of the record.

How to provide live Public Comment during the meeting:

Please click the link below to join the webinar:

<https://hayward.zoom.us/j/83249698647?pwd=eEwxNDlTa3hDdk1uVnY3elg1bXMxZz09>

Webinar ID: 832 4969 8647

Passcode: 7!Q!go6P

Or Telephone:

Dial:

US: +1 669 900 6833 or +1 346 248 7799

Meeting ID: 832 4969 8647

Passcode: 44336639

International numbers available: <https://hayward.zoom.us/j/83249698647>

A Guide to attend virtual meetings is provided at this link: <https://hayward.zoom.us/j/83249698647>

CALL TO ORDER**ROLL CALL****APPROVAL OF HASPA MINUTES OF JULY 8, 2021**

1. [MIN 21-126](#) Approval of the HASPA Minutes of July 8, 2021

Attachments: [Attachment I Draft HASPA Minutes of July 8, 2021](#)

PUBLIC COMMENTS:

The Public Comment section provides an opportunity to address the Board on items not listed on the agenda. The Board welcomes your comments and requests that speakers present their remarks in a respectful manner, within established time limits, and focus on issues which directly affect the Board or are within the jurisdiction of the Board as the Board is prohibited by State law from discussing items not listed on the agenda, your item will be taken under consideration and may be referred to staff.

REPORTS: Technical Advisory Committee (TAC) Updates**2. Planning Project Updates**

1. Amazon Last Mile Delivery Station at 2701 West Winton Ave
2. U-Haul Development at 4150 Point Eden Way
3. LogistiCenter at 25450 Clawiter Road (Former Berkeley Farms Site)
4. Duke Realty Building at 24493 Clawiter Road
5. Industrial Shell Building at 3636 Enterprise Ave

3. San Lorenzo-Bockman Levee Project Update. (Previously called the Oro Loma Interim Levee)**4. JPA Extension Update****5. HASPA Expansion Update**

6. [RPT 21-112](#) South Bay Salt Pond Restoration Project - Eden Landing Phase 2

Attachments: [Attachment I Memo](#)
[Attachment II Presentation](#)

**Hayward Area Shoreline Planning
Agency****Agenda****October 14, 2021**

7. [RPT 21-113](#) HASPA Meeting Schedule for 2022 Calendar Year

Attachments: [Attachment I 2022 HASPA Meeting Schedule](#)

REPORTS: Board Members (Trustees)

REPORTS: Setting of Agenda for Next Meeting (Trustees/TAC)

ADJOURNMENT

NEXT MEETING, January 13, 2022, 3:00PM

Assistance will be provided to those requiring accommodations for disabilities in compliance with the Americans Disabilities Act of 1990. Interested persons must request the accommodation at least 48 hours in advance of the meeting by contacting the City Manager at (510) 583-4300 or TDD (510) 247-3340.

Letter 2

COMMENTER: Ellison Folk of Shute, Mihaly, and Weinberger LLP on behalf of the San Francisco Bay Chapter of the Sierra Club

DATE: October 25, 2021

Response 2.1

The commenter states an opinion that the IS-MND fails to analyze the severity of environmental impacts and, as a result, violates the minimum standards of adequacy under CEQA. The commenter specifically expresses that the IS-MND understates the impacts of air quality, GHG emissions, and transportation.

The commenter does not provide enough detail to respond to this comment. For example, the commenter does not describe how the IS-MND fails to analyze the severity of air quality impacts. As discussed throughout the IS-MND and within the following responses, the proposed project is described in the IS-MND, and the IS-MND evaluates potential environmental impacts of the project. Impacts related to air quality, GHG emissions, and transportation were determined to be less than significant, with mitigation where warranted depending on the specific impact.

Response 2.2

The commenter states an opinion that the IS-MND fails to adequately describe the project, which makes the analysis of environmental impacts inherently unreliable.

The project is adequately described in the project description on pages 5 through 18 of the IS-MND. The commenter does not provide specific explanation of what details are missing and how these would affect the analysis. No revisions to the IS-MND are necessary in response to this comment.

Response 2.3

The commenter states that in a meeting held by the City Council's Economic Development Committee in May 2021 the project was described the site as an Amazon Last Mile Delivery Station. The commenter further states that none of these details are described in the IS-MND or supporting traffic analysis and therefore the IS-MND should be revised to describe the project more accurately.

This comment is related to the project site being developed as an Amazon Last Mile Facility or ecommerce site, which is addressed in the Topical Response. No revisions to the IS-MND are necessary in response to this comment.

Response 2.4

The commenter expresses an opinion that the project would result in potentially significant impacts requiring the preparation of an Environmental Impact Report (EIR). Specifically, the commenter suggests that the project would cause significant impacts related to traffic and air quality which would require mitigation measures and an analysis of project alternatives.

As discussed later in this letter, the commenter provides more explanation of their opinion as to why the project should require an EIR. However, the basis of this comment assumes that the project site would be used as an Amazon last-mile facility or similar ecommerce site which it is no longer proposed. As discussed in the Topical Response, for the project would not involve an Amazon last-

mile facility or similar ecommerce use. Establishment of an Amazon last-mile facility or similar ecommerce use at the project site would be subject to a separate Conditional Use Permit and environmental review and approval process.

Furthermore, potential impacts of the project as proposed have been evaluated and discussed in the IS-MND and have been determined to be less than significant with mitigation where warranted. No revisions to the IS-MND are necessary in response to this comment.

Response 2.5

The commenter expresses an opinion that the IS-MND fails to accurately describe the project's setting in relation to sensitive receptors. Specifically, the commenter notes that a school and residential neighborhood are located 0.2 mile from the project site and that the site is located within an area in the 80th percentile of communities that are considered overburdened by environmental hazards. The commenter further suggests that the IS-MND fails to consider other health impacts from NO_x and particulate matter beyond cancer risks from stationary sources.

The commenter is correct in stating that the project site is located within 0.2 mile of a sensitive receptor, as described on page 30 of the IS-MND. The project site is also located in an area defined as a disadvantaged community per Senate Bill (SB) 1000 and California Health and Safety Code Section 39711. However, the City of Hayward has not yet adopted environmental justice policies or thresholds as part of their General Plan. Additionally, environmental justice is not a CEQA resource or topic area for evaluation. The CEQA resources or topic areas for impact evaluation are listed in Appendix G of the State CEQA Guidelines, and Appendix G does not include environmental justice.

Additionally, under the CEQA Appendix G Checklist, the IS-MND is required to consider if the project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard does consider the health impacts or if the project would expose sensitive receptors to substantial pollutant concentrations. As discussed on pages 34 through 40 of the IS-MND, construction and operation of the site with warehouses or other permitted industrial uses would not result in significant impacts regarding air quality. No revisions to the IS-MND are necessary in response to this comment.

Response 2.6

The commenter states an opinion that the Transportation Analysis prepared by Kittelson & Associates does not analyze the health risks on nearby sensitive receptors associated with increased truck traffic.

This comment is similar to comment 2.5. Please see Response 2.5. As described therein, CEQA does not mandate specific health impacts beyond those require in the Appendix G Checklist. The traffic analysis prepared by Kittelson & Associates, as well as the IS-MND, address the potential health impacts of pollutants and determined these impacts would be less than significant. Therefore, no revisions are necessary to the IS-MND.

Response 2.7

The commenter expresses an opinion that the NO_x impacts are underestimated in the Draft IS-MND. This statement is based on the commenter's belief that the site could be developed as an ecommerce facility under the existing IS-MND and therefore the number and type of vehicles analysed underestimates the potential for the site.

As detailed in the Topical Response, the project would not be operated as an ecommerce facility. Development as an ecommerce facility would at the project site would be subject to a separate Conditional Use Permit and environmental review and approval process. No revisions to the IS-MND are necessary in response to this comment.

Response 2.8

The commenter expresses an opinion that the IS-MND employs faulty construction equipment assumptions by omitting haul trucks from the analysis and the unsubstantiated reduction in construction schedule while maintaining default construction equipment intensity.

As detailed in Response to Comment 1.1 above, the air quality modeling completed for the IS-MND did not include truck trips for demolition because demolition materials would be reused on-site and not require off-haul. A total of 69 truck trips would be required to import approximately 552 cubic yards of material during project grading. These truck trips were not included in the modeling completed for the IS-MND. However, as detailed in Response 1.1, 69 haul truck trips would result in minor increases in NOx emissions (0.27 lbs/day) beyond what is reported in the IS-MND. This does not change the significance findings of the IS-MND and minor alterations in Table 6 of the IS-MND are outlined in Response 1.1, above.

Additionally, as detailed in Response 1.1, the reduction in construction schedule and the use of the default construction equipment list is accurate based on the construction equipment default lists based on site size rather than project specific development or phase length. Therefore, no changes to the IS-MND need to be made based on this comment.

Response 2.9

The commenter expresses an opinion that the IS-MND fails to adequately disclose or mitigate GHG emissions from the project, further stating that GHG emissions over existing conditions should be considered significant and a net zero threshold should be used. Additionally, the commenter suggests that the analysis fails to consider the 30-year lifetime of the project and therefore should, at a minimum, be required to meet the 2050 goal of 80 percent below 1990 levels.

The commenter opines that based on the California Air Resources (CARB) 2017 Scoping Plan, "Achieving no net additional increases in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development."³ However, the commenter fails to acknowledge further discussion by CARB which states that "Achieving net zero increases in GHG emissions, resulting in no contribution to GHG impacts, may not be feasible or appropriate for every project, however, and the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."⁴ Additionally, the Amendments to Section 15064.4 of the State CEQA Guidelines, lead agencies are granted the discretion to establish significant thresholds for their jurisdictions, including adopting thresholds developed by other public agencies, or suggested by other experts such as Air Districts, as long as the chosen thresholds are supported by substantial evidence (see Section 15064.7(c)). While the Commenter is correct in stating that the BAAQMD is currently updating their GHG thresholds to address the 2050 State reduction goals, currently the thresholds established by the BAAQMD have been adopted and are applicable to

³ CARB. California's 2017 Climate Change Scoping Plan. Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Pg. 101

⁴ CARB. California's 2017 Climate Change Scoping Plan. Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Pg. 102

projects constructed within the BAAQMD's jurisdiction until revised thresholds have been adopted. The MND conservatively adjusts the BAAQMD's thresholds to consider the more intensive reduction standards post 2020, by adjusting the current 1,100 MT CO₂e threshold established in the BAAQMD guidelines to 660 MT of CO₂e annually (i.e. reducing the threshold to meet the 2030 goal of 40 percent below 1990 levels). Further, the Governor's Office of Planning and Research released a technical advisory on CEQA and climate change that states while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."⁵ Additionally, the 2017 Scoping Plan states that "While this guidance is provided out of the recognition that local policy makers are critical in reducing the carbon footprint of cities and counties, the decision to follow this guidance is voluntary and should not be interpreted as a directive or mandate to local governments."⁶ Therefore, while a net-zero GHG increase is certainly one threshold that can be set by the jurisdiction to determine significance, it is not a mandated threshold, and therefore the IS-MND is not required to adopt a net-zero threshold. The threshold used in the IS-MND is supported by substantial evidence and therefore is valid for determining significance under CEQA, as described on pages 69 and 70 of the IS-MND.

The project analysis is based on the emissions at the opening year of the project, which in this case was assumed to be 2022. The project would be constructed using the current technology available at the time of construction. While the 2017 Scoping Plan and other reduction plans outline measures by which to reduce GHG emissions, these plans have only determined measures that will reduce emissions to and somewhat beyond the 2030 goal of 40 percent below 1990 levels. As stated in the 2017 Scoping Plan, "While the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 state-wide GHG target (80 percent below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals. For example, though Zero Net Carbon Buildings are not feasible at this time and more work needs to be done in this area, they will be necessary to achieve the 2050 target."⁷ Therefore, given that the 2017 Scoping Plan relies heavily on measures needing to be implemented above the individual project level, and even with these policies the technology is not currently available to meet the 2050 goals, it is not applicable to hold a project that would be fully developed and operational well before 2030 to standards that cannot currently be achieved with the current technology; reductions based on these new technologies would be speculative. Therefore, the non-zero threshold established in the IS-MND and based on the 2030 goals is sufficient to determine less than significant impacts. No revisions to the IS-MND are necessary in response to this comment.

Response 2.10

The commenter expresses an opinion that the IS-MND inaccurately quantifies the GHG emissions of the project because it relies on vehicle trips and mileage for a use other than ecommerce. This commenter also suggests that that vehicle trips were underestimated for an ecommerce use. Please see the Topical Response in Section 2.1. No revisions to the IS-MND are necessary in response to this comment.

⁵ OPR 2018. California's Fourth Climate Change Assessment: State-wide Summary Report. August 2018.

⁶ CARB. California's 2017 Climate Change Scoping Plan. Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Pg. 99

⁷ CARB. California's 2017 Climate Change Scoping Plan. Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Pg. 18

Response 2.11

The commenter expresses an opinion that the IS-MND fails to adequately mitigate GHG impacts by failing to quantify the expected reductions from the mitigation measures proposed and fails to provide sufficient evidence that demonstrates carbon offsets will be available and enforceable.

The commenter is incorrect in stating that the IS-MND fails to quantify the expected GHG emissions reductions resulting from Mitigation Measure GHG-1. Table 16 on page 71 of the IS-MND identifies that total project GHG emissions would be approximately 3,767 MT CO₂e annually, including amortized construction emissions. The threshold of significance is 660 MT CO₂e annually, which means that Mitigation Measure GHG-1 would reduce project emissions by a minimum of 3,107.01 MT CO₂e annually to reach 660 MT CO₂e or less.

As stated in Mitigation Measure GHG-1, “The project applicant shall contract with a qualified professional, such as a GHG specialist or sustainability consultant, to prepare and implement a Greenhouse Gas Reduction Program (GHGRP) that includes on-site GHG reduction measures to reduce the project’s total remaining GHG emissions to 660 MT of CO₂e per year or less.” Therefore, while the IS-MND provides a list of potential reduction measures, the project is not mandated to implement any specific measures. The only caveats placed on Mitigation Measure GHG-1 are that up to 50 percent of the emissions reductions need to come from on-site measures and a maximum of 50 percent of the emissions reductions can come from the purchase of carbon offsets. Given that the mitigation measure is the development of a GHGRP to determine what reduction measures will be chosen, it is impossible for the IS-MND to quantify reductions associated with unnamed measures other than to state that based on the provided analysis, onsite reduction measures must reduce GHG emissions by 1,553.51 MT CO₂e annually (one half of 3,107.01 MT CO₂e) and that, assuming the availability enforceability of carbon offset at the time the GHGRP is developed, a maximum of 1,553.51 MT CO₂e annually can be achieved through carbon offsets. While these values are not explicitly stated in the IS-MND, they can be inferred from the provided analysis.

Mitigation Measure GHG-1 implements the use of carbon offsets as an option but does not indicate that offsets have to be purchased, the project could account for 100 percent of the mandatory reductions through on-site measures. Additionally, as stated in the first paragraph of Mitigation Measure GHG-1, the measure “Potential options include, but would not be limited to...” the reduction scenarios identified. Therefore, while carbon offsets can be used if available, the project applicant has the flexibility to implement GHG reduction options available to them that would offset GHG emissions either onsite or offsite. As Mitigation Measure GHG-1 does not mandate the offset of 50 percent of emissions to be reduced, it is not required to identify the availability of offsets at the current time. As detailed in Response to Comment 2.11 above, the mitigation measure as written requires the preparation of a Greenhouse Gas Reduction Program (GHGRP) that details the measures to be used and would quantify the reduction at that time. The GHGRP requires that the plan be submitted to and approved by the Development Services Planning Division and Public Works – Environmental Services Division before issuing a building permit and would verify full compliance with the approved GHGRP prior to issuance of a Certificate of Occupancy. While Mitigation Measure GHG-1 does allow for carbon offsets, the amount, availability, and enforceability of them would be determined in the GHGRP. Therefore, the IS-MND does not need to provide evidence of the availability or reliability of achieving 50 percent of the emissions from carbon offsets at this time as the amount of offset needed has not yet been determined.

It should be noted that there is a typographical error in the “*Plan Requirements and Timing*” text on page 73 of the IS-MND. The typographic error does not result in new or more severe significant

environmental impacts or new mitigation measures. However, identifying the typographical error may provide clarification. Therefore, for information purposes, Mitigation Measure GHG-1 on page 73 of the IS-MND is revised as follows:

Plan Requirements and Timing

Upon identifying a potential tenant, the applicant shall submit to Development Services Planning Division and Public Works – Environmental Services Division the GHGRP for review and approval prior to issuance of tenant improvements for the first tenant to occupy the space(s). A new GHGRP shall be required for each turnover (i.e., each new tenant) and shall be submitted with applications for tenant improvements or business licenses. The GHGRP shall either reduce the project's emissions to 660 MT CO₂e per year or shall incorporate all feasible actions to reduce emissions associated with electricity demand, transportation, and waste generation and shall purchase up to 50 percent carbon offsets. Development Services Planning Division and Public Works – Environmental Services Division shall verify that project plans incorporate required GHG emission reduction measures per the GGRP prior to final design approval. Each emission reduction measure shall include a commitment enforceable by Development Services Planning Division and Public Works – Environmental Services Division.

The typographical error does not warrant revision and recirculation of the IS-MND. No other revisions to the IS-MND are required in response to this comment.

Response 2.12

The commenter expresses an opinion that the allowance in Mitigation Measure GHG-1 that up to 50 percent of GHG reductions may be achieved through offsets conflicts with established policy that reflects the inherent unreliability of such offsets.

As detailed in Response to Comment 1.3 above, Mitigation Measure GHG-1 includes the use of carbon offsets as an option but does not indicate that offsets must be purchased. Additionally, as stated in the first paragraph of Mitigation Measure GHG-1, "Potential options include, but would not be limited to..." the reduction scenarios identified. Therefore, while carbon offsets can be used if available, the project applicant has the flexibility to implement any GHG reduction options available to them that will offset GHG emissions either onsite or offsite. As the Mitigation Measure does not mandate the offset of 50 percent of emissions to be reduced, it is not required to identify the availability of offsets at the current time. As detailed in Response to Comment 2.11 above, the mitigation measure as written requires the preparation of a Greenhouse Gas Reduction Program (GHGRP) that details the measures to be used and would quantify the reduction at that time. The GHGRP requires that the plan be submitted to and approved by the Development Services Planning Division and Public Works – Environmental Services Division before issuing a building permit and would verify full compliance with the approved GHGRP prior to issuance of a Certificate of Occupancy. While Mitigation Measure GHG-1 does allow for carbon offsets, the amount, availability, and enforceability of them will be determined in the GHGRP. Therefore, the IS-MND does not need to provide evidence of the availability or reliability of achieving 50 percent of the emissions from carbon offsets at this time as the amount of offset needed has not yet been determined. No revisions to the IS-MND are necessary in response to this comment.

Response 2.13

The commenter expresses an opinion that the IS-MND fails to adequately address transportation impacts, specifically stating that the project would generate far more employee trips as a warehouse than is reflected in the transportation analysis. The commenter further asserts that the project cannot rely on a screening threshold that fails to reflect the actual impacts of the project.

The transportation section of the IS-MND relies on a transportation analysis prepared by Kittelson & Associates, which is included as Appendix D to the IS-MND. As described in Section 2.1 in the Topical Response, the transportation analysis evaluated two scenarios for the project. One was based on the site being used for an ecommerce use. The trip rate of 2,492 daily trips is based on data provided by the Institute of Transportation Engineers (ITE) for a High-Cube Fulfillment Center Warehouse – Sort land use code (Code 155). Using Code 155 best represents traffic generated by potential ecommerce tenant types. The second scenario evaluated was for a general industrial use, which is a less intensive land use with regards to vehicle trip generation compared to an ecommerce use. However, Code 155 for a High-Cube Fulfillment Center Warehouse – Sort generates more trips and was therefore used in the IS-MND to provide the most conservative impact analysis. However, as discussed in the Topical Response: Amazon Last Mile Facility, an Amazon last-mile facility or similar ecommerce uses are not proposed thus the project would likely result in fewer vehicle miles traveled than were projected in the transportation analysis. Page 124 of IS-MND also provides an estimation of project trip generation for a general light industrial use (ITE Code 110) which determines a reduction of 572 daily trips in comparison to an ecommerce site.

The commenter also suggests that the project cannot rely on a screening threshold that fails to reflect the actual impacts of the project. However, the IS-MND relies on the City of Hayward's VMT threshold of significance which follows guidance from the California Office of Planning and Research (OPR). The City of Hayward has developed screening criteria to provide project applicants with a conservative indication of whether a project could result in potentially significant VMT impacts. If the screening criteria are met by a project, the applicant would not need to perform a detailed VMT assessment for their project. Given that the project is in an industrial park with primarily industrial uses consisting of a warehouse or other permitted industrial uses, it was determined that the Employment-Industrial threshold would be appropriate for the project. Therefore, no revisions are necessary to the IS-MND in response to this comment.

Response 2.14

The commenter expresses an opinion that vehicle trips generated by the project would have adverse impacts on salmon in the San Francisco Bay, citing a study conducted by the University of Washington linking materials in automotive tires and salmon mortality.

The commenter provides a link to an article in Science.org describing the salmon mortality study conducted by University of Washington in Seattle and Tacoma.⁸ According to the article, tire rubber is a complex mixture of chemicals, and as tires wear and breakdown from friction on road surfaces, these chemicals may make their way into waterbodies. The research conducted by University of Washington concluded that some of these chemicals are linked to salmon mortality, specifically for coho salmon (*Oncorhynchus kisutch*). The article includes paraphrased statements from the lead researcher at University of Washington, including the researcher noting that other species of fish should also be evaluated for sensitivity. In other words, the research completed by University of

⁸ <https://www.science.org/content/article/common-tire-chemical-implicated-mysterious-deaths-risk-salmon>

Washington was specific to coho salmon only, and no research was completed on other species of fish.

According to the California Department of Fish and Wildlife (CDFW), the species of salmon that is abundant in the San Francisco Bay and for which the CDFW has undertaken reintroduction efforts is Chinook salmon (*Oncorhynchus tshawytscha*). Chinook salmon and coho salmon are different species of fish. Because the research conducted by University of Washington was specific to coho salmon and the lead researcher says other fish species need more evaluation, the conclusions of the University of Washington cannot be applied to Chinook salmon.

However, while speculative, even if the research conducted by Washington State University is conducted on other species of fish, including Chinook salmon, and the research comes to the same conclusion, the vehicle trips and thus tire wear resulting from the project would be an incremental and negligible increase compared to existing baseline conditions. As shown in Table 27 on page 124 of the IS-MND, the proposed project would result in approximately 1,920 vehicle trips per day. This is only a minor fraction of the vehicle trips already occurring in the Hayward area alone, let alone the rest of the San Francisco Bay which has substantial traffic. For example, according to Caltrans, approximately 194,000 vehicle trips occur daily on State Route 92 at the Clawiter Road crossing, just south of the project site.⁹ Therefore, the trips generated by the project would be an incremental increase, and impacts to salmon and salmon habitat (i.e., water quality) would be less than significant. No revisions to the IS-MND are required in response to this comment.

Response 2.15

The commenter states an opinion that the IS-MND fails to address cumulative project impacts, specifically mentioning air quality impacts, GHG impacts, and transportation impacts resulting from the surrounding industrial projects.

As discussed on page 140 of the IS-MND, the proposed project would not result in cumulatively considerable impacts. Therein it explains that the project was considered in relation to surrounding projects, including the Gillig Industrial Project located immediately adjacent to the south of the project site and other projects in the area, which would include the Duke Industrial Project, mentioned by the commenter. The proposed project involves development of warehouses and other permitted industrial uses that would be consistent with the City's General Plan designation and zoning code. As described throughout the IS-MND, impacts of the proposed project would be less than significant, either with or without mitigation, depending on the specific impact. Other cumulative projects would also be subject to environmental review and mitigation measures developed specifically for project-level impacts. Alternatively, other projects could be subject to mitigation measures stated in the EIR prepared for the City's General Plan. Nonetheless, the IS-MND determined that the proposed project would not result in a significant contribution to cumulatively considerable impacts, and impacts would be less than significant with mitigation incorporated.

Furthermore, impacts related to air pollutant and GHG emissions are cumulative because the thresholds are based on the maximum quantity of emissions that can occur by an individual project in order to achieve the cumulative pollution and GHG reduction targets. Therefore, the analysis

⁹ California Department of Transportation (Caltrans). 2020. Traffic Volumes: Annual Average Daily Traffic (AADT). 2020-AADT [database]. Available at: <https://dot.ca.gov>

presented in the Air Quality and GHG Emissions sections of the IS-MND are both the direct and indirect effects of the project, as well as the cumulative impact. As described in the Air Quality section of the IS-MND, impacts of the project would be less than significant without mitigation. As described in the GHG section, impacts of the project would be less than significant with implementation of Mitigation Measure GHG-1.

As described on page 123 of the IS-MND, VMT is the metric by which significant transportation impacts are evaluated pursuant to SB 743 and State CEQA Guidelines Section 15064.3. As described on page 127 of the IS-MND, pursuant to the City's adopted VMT thresholds, the proposed project was screened out from further analysis because the project site is located in an area that is below the existing regional average VMT per employee. In other words, VMT generated by the project would be below the existing regional average and would not contribute toward a substantial increase in VMT or a significant cumulative VMT impact. Therefore, no revisions are necessary to the IS-MND.

Response 2.16

The commenter expresses an opinion that the IS-MND does not satisfy the requirements of CEQA and would result in significant environmental impacts that require preparation of an EIR.

As discussed throughout the IS-MND and within the above responses to this comment letter, the proposed project and setting are properly described in the IS-MND. Based on the project description and setting, the IS-MND appropriately evaluates the potential environmental impacts of the project. Project impacts were determined to be less than significant with mitigation where warranted, and the IS-MND provides feasible mitigation measures to reduce potentially significant impacts, as applicable. This comment has been noted, but no further revisions to the IS-MND are required.



ALAMEDA LABOR COUNCIL AFL-CIO

LETTER 3**Send all correspondence to:****Executive Secretary-Treasurer**

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October 25, 2021

Leigha Schmidt, Senior Planner
 City of Hayward
 Planning Division
 777 B Street
 Hayward, California 94541
 Leigha.Schmidt@hayward-ca.gov

RE: “Berkeley Farms” Project, 25450 - 25550 Clawiter Road Industrial Project IS/MND

Ms. Schmidt,

This letter is submitted to provide comments on the Initial Study/Mitigated Negative Declaration (“IS/MND”) prepared for the proposed warehouse complex proposed for 25450-25550 Clawiter Road (former site of the Berkeley Farms facility). The IS/MND was prepared to evaluate potential impacts of a warehouse campus featuring 387,271 square feet of industrial and office space. The site is currently zoned IG (General Industrial). The project applicant is pursuing numerous approvals including conditional use and major site plan permits.

Cumulative Impacts and Forecasting

A local agency must use its best efforts to “find out and disclose all that it reasonably can,” when preparing an informational environmental document such as an EIR or negative declaration. Cal. Pub. Res. Code (PRC) Sec. 21083; Cal. Code of Reg. (CCR) Sec. 15144; *see also* CCR Sec. 15355. The effects of a project can be considered “cumulatively considerable” when “the incremental effects of an individual project...when viewed in connection with the effects of

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past projects, *the effects of other current projects, and the effects of probable future projects.*” Whitman v. Bd. of Supervisors (1979) 88 Cal.App.3d 397, 406-407 (emphasis added). The conclusion that informational environmental documents needed to consider cumulative impacts of other concurrent or likely near-term projects was made in part by analogy to the National Environmental Protection Act (NEPA). *See Natural Resources Defense Council v. Callaway* (2d Cir. 1975) 524 F.2d 79, 88.

The rationale underlying the Section 15144 requirement to study cumulative impacts is spelled out in the NEPA case as adopted by California courts: “[An] agency may not . . . [treat] a project as an isolated ‘single shot’ venture in the face of persuasive evidence that it is but one of several substantially similar operations, each of which will have the same polluting effect in the same area.” *Id.* The California courts imported this rationale to the CEQA cumulative impact analysis in the *Whitman* case, and the state itself incorporated this interpretation in turn in the CEQA handbook to the California Code of Regulations CEQA Guidelines. *See CEQA Handbook 2021* at 301.

The City of Hayward currently has another facility, currently also seeking entitlements sufficient to allow operation of a “last mile”-style delivery station, less than a mile away on the same road, at 24493 Clawiter Road (“Duke Project”). This falls squarely into the requirement above that cumulative impact analysis be conducted where there is evidence that a pollutant source of a similar type in the same vicinity is reasonably likely to be developed. In this case, the

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City as the local agency has prepared both environmental documents, neither of which considers the other project. The IS/MND for the Berkeley Farms project does not reference the Duke Project at all, except for passive references to the property as a result of geographic surveys related to Superfund sites.

This is a serious informational defect of the IS/MND. Particularly given the potential uses of the sites, the overlap and therefore multiplication of environmental impacts, the potential cumulative effects of these two projects need to be considered together, and the efficacy of mitigation measures for each site need to be considered with reference to the qualitative and quantitative impacts of mitigations for each site.

It is important to note that it is immaterial whether or not final users or operators of the site have been identified or are known to the applicants or the City. The City has a responsibility to reasonably pursue the potential range of applicants--i.e., if the applicant/developers are in negotiations with any party or if any party has options--but in any case, the range of potential uses is known.

This is for two reasons: first, because the range of uses permissible under the zoning code is known, i.e., the IG district has a finite and quantifiable range of permitted uses. Second, because the applicants and the City have evaluated the applications based on data assuming the “highest” or most intense use. Therefore whether or not the ultimate project operator actually undertakes a lesser use is not germane; the applicants are seeking entitlements for the most intense use,

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3.2



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and there are no binding restrictions that would guarantee anything other than the most intense use materialize at the site.

Nor is the fact that these are private projects being proposed by different applicants. CEQA Guidelines Section 15142 expressly requires that CEQA analysis is concerned with “public and private” projects when determining the relevant regional setting that creates the context for environmental review. *See* CCR Section 15142. This was at issue in the *Whitman* case, where a variety of potential oil drilling and transfer projects under different developers but with potentially similar environmental impacts were within the vicinity of the subject property.

Nor is the fact that the subject property and surrounding properties are zoned IG sufficient to “cover” the potential development of a warehouse or “last-mile” style delivery station in such close proximity. For one thing, the potential range of uses in industrial zones is such that merely referring to the surrounding industrial zones offers no meaningful data or substantial evidence which the public or decision makers can factor into their review of the proposed project.

Neither the “Existing Setting and Surrounding Land Uses” nor the “Description of Project” reference the proposed Duke Project. This omission does not allow the public or the decisionmakers to adequately review the impact of the proposed project. While an Initial Study and Mitigated Negative Declaration do not require the degree of specificity of a full Environmental Impact Report, the absence of any acknowledgment of a similar project within

3.3



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such proximity is a fundamental defect even of an Initial Study, which requires adequate discussion of the project setting. In any case, the requirement to consider cumulative impacts is also applicable to negative declarations.

There are numerous areas where a potential impact may accumulate with those of the Duke Project: transportation (because of the shared road, shared ingress and egress to both the interstate and the airport, and increased traffic on residential roads); air quality (because of the criteria pollutants and greenhouse gas emissions common to both uses); soils and hazardous substances becoming airborne due to construction; and acoustical impacts, among others. All of these areas need to be studied in conjunction between the two projects.

Cumulative Transportation Impacts

Transportation impacts are perhaps the paragon example of why a local agency needs to consider cumulative impacts from known similar projects within the vicinity of a proposed project. The Berkeley Farms Project and the Duke Project will literally share a road, and both are being permitted as either warehouses or freight/truck terminals. These are traffic-intensive projects. Comments submitted to the Duke Project demonstrated that the transportation analysis there may have been insufficient for a failure to adequately address the impact of last-mile deliveries throughout residential neighborhoods, and given the unique nature of last-mile deliveries (i.e., frequent stopping, idling, consuming curbside space and bike lanes etc.) The applicants are asking the City,

3.3

3.4



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and the public, to abide potentially *two* such facilities in a very compressed area, sharing the same road (a road which runs between a regional airport and a major highway).

It may well be that only one, or neither, site will actually end up being a last-mile style delivery station and that traffic intensity at the site will not be as high as is expected at a last-mile delivery station. Nevertheless, the applicants are seeking entitlements that would allow such a use to be built by right, and the City and the public do not have the luxury of ignoring that fact. The applicant could choose to either away entitlements until a specific user has been identified and thereby allow the public to review a more specific proposal and implement more specific conditions and mitigations, or submit to more thorough review.

Project-Specific Transportation Analysis is Insufficient

The Berkeley Farms proposed facility uses the Institute for Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, Code 155 land use for its transportation analysis. See IS/MND at 124. This is meant to capture “e-commerce” warehouse uses, but the rationale for the choice of this land use designation is unclear, and seemingly inappropriate. Code 155 is meant for “High-Cube Warehouse (HCW) Fulfillment Center,” the trip generation characteristics for which the ITE studied facilities between 818,000 square feet and 1,466,000 square feet.

3.4

3.5



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The IS/MND screens the project from a full VMT analysis based on the reduction to per-employee VMT resulting from mitigation measures. These mitigation measures are focused on commuting, like carpooling and bike storage, and room for food trucks that would allow employees to remain on site. But the vehicle miles traveled generated by a last-mile style delivery station come not only from on-site employees but from the delivery employees who pick up and deliver packages all throughout the day--and importantly, at significantly greater intensity during peak seasons.

The transportation analysis seems to lack any discussion of differential transportation impacts during peak seasons--especially around the end-of-year holidays. The IS/MND does not state why there should be no such analysis, given the choice of ITE Land Use Code, i.e., the Code 155 “HCW Fulfillment Center” which specifically contemplates deliveries to consumers: “High cube fulfillment center warehouses include warehouses characterized by a significant storage function and direct distribution of ecommerce products *to end users*.” In other words, the same assumption underlying the trip generation characteristics assumes deliveries going from the site to consumers, i.e., the “last mile” from an ecommerce retailer to their customers. Therefore, it is a reasonable assumption that there will be variable trip generation and vehicle miles traveled characteristics between seasons.

3.5



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Cumulative Air Quality Impacts

The Bay Area Air Quality Management District (BAAQMD) issues regulations, standards, and data to allow communities and local agencies within the District to make informed planning decisions. This is why among the elements of air quality analysis, any conflicts with the BAAQMD's air quality plan--the 2017 Clean Air Plan--is considered as a potentially significant adverse impact on air quality.

The cumulative concentration of emissions of a particular type--from vehicle emissions, and from continuous operation of a cube-style multi-story warehouse, as well line-delivery truck deliveries--could have a significant impact on the local ambient air quality and concentration of pollutants and particulates. These need to be studied together in conjunction with both facilities.

Conclusion

For the foregoing reasons, we respectfully request that the City reject the IS/MND and require a full EIR consistent with the above objections.

In Solidarity,

Elizabeth Ortega-Toro
Executive Secretary-Treasurer

Rome Aloise
President, Teamsters Joint Council 7
Secretary-Treasurer, Teamsters Local 853



ALAMEDA LABOR COUNCIL AFL-CIO

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Letter 3

COMMENTER: Elizabeth Ortega-Toro, Alameda Labor Council

DATE: October 25, 2021

Response 3.1

The commenter states an opinion that the IS-MND fails to address cumulative project impacts including those from surrounding industrial projects, specifically the Duke Industrial Project.

This comment is similar to comment 2.15. Please see Response 2.15, above. As described therein and on page 140 of the IS-MND, the proposed project would not result in cumulatively considerable impacts. Therein the IS-MND explains that the project was considered in relation to surrounding projects, including the Duke Industrial Project located near the project site.

Further, because the project site was formerly operated with the Berkeley Farms facility, the site lacks many environmental resources, such as biological resources. The impacts of the project most likely to also result from nearby projects, such as the Duke Industrial Project, are associated with pollution emissions during operation. As described above in Response 2.15, the IS-MND identifies the potential air quality and greenhouse gas (GHG) emissions of the project. The direct air quality and GHG impacts of the project are also the cumulative impacts because the thresholds of significance are based on future targets and consistency with cumulative growth in the region into the foreseeable future. The air quality and GHG impacts of the project would be less than significant with implementation of Mitigation Measure GHG-1.

In summary, the cumulative impacts analysis in the IS-MND accounts for other projects in the surrounding area. The project would not exceed thresholds of significance for operational impacts most likely to also occur from other nearby industrial projects, such as air quality impacts and GHG impacts. The thresholds for these impacts are cumulative in nature because they require the project to be evaluated against cumulative growth forecasts and emissions targets for the region.

Therefore, no revisions are necessary to the IS-MND.

Response 3.2

The commenter expresses an opinion that the City has a responsibility to pursue a range of applicants that could potentially utilize the site. Additionally, the commenter describes CEQA requirements to describe existing setting in a regional context, and mentions that describing surrounding uses as industrial is insufficient for a project consisting of an Amazon facility or ecommerce type use.

As described on page 5 of the IS-MND, the project sponsor is Dermody Properties. Dermody Properties is a private real estate firm that controls the property it owns, leases, or administers. Dermody Properties would either own the project site or sell the property, but regardless, the City would not own or operate the project site or proposed warehouses. Therefore, the City cannot solicit tenants for the building, as the City has no ability to lease or sell the warehouses or project site property.

The IS-MND shows and describes the regional setting of the project site. Specifically, Figure 1 on page 6 of the IS-MND shows the regional location of the project site. A description of the existing setting and surrounding land uses is provided on page 9 of the IS-MND. A detailed setting is provided for applicable environmental resources. For example, a detailed setting for air quality is

provided on pages 27 and 28 of the IS-MND. Therefore, the regional setting of the project site is described in the IS-MND in a way that is sufficient for identifying the potential environmental impacts of the project.

This last part of this comment is related to the project being used as an Amazon last-mile facility or similar ecommerce use, which is addressed in the Topical Response in Section 2.1 of this document. No revisions to the IS-MND are necessary in response to this comment.

Response 3.3

The commenter states an opinion that the project description and existing setting portions of the IS-MND fail to reference the Duke Industrial Project, which prevents an adequate review of the impacts of the proposed project.

The commenter is correct that the Project Description and existing setting portions of the IS-MND do not specifically reference or describe the Duke Industrial Project. The project description does not reference or describe the Duke Industrial Project because the Duke Industrial Project is not part of the proposed project. The Duke Industrial Project is not associated or affiliated with the proposed project and would occur on separate properties separated by Clawiter Road. The existing setting does not reference the Duke Industrial Project because the project has not yet been constructed and therefore is also not yet existing. However, page 9 of the IS-MND describes existing industrial uses in all directions from the project site, which accounts for the Duke Industrial Project, even if it is not yet in existence.

With the exception of the discussion of cumulative impacts, the IS-MND does not need to consider the Duke Industrial Project in evaluating and mitigating the potential impacts of the proposed project. As described above in Response 3.1, cumulative impacts of the project would be less than significant, including air quality and GHG impacts. The commenter also describes the potential for cumulative impacts related to hazardous materials release during construction of the proposed project and the Duke Industrial Project. As described on page 85 of the IS-MND, implementation of Mitigation Measure HAZ-1b would be required. Mitigation Measure HAZ-1b requires the applicant to develop a Construction Site Management Plan that includes measures to prevent the release of contamination during project construction. The Construction Site Management Plan must be approved by the City prior to issuance of the grading permit. Implementation of Mitigation Measure HAZ-1b would prevent the release of hazardous materials during construction. Therefore, the proposed project would not considerably contribute to a significant cumulative impact related to hazardous materials. No revisions to the IS-MND are required in response to this comment.

Response 3.4

The commenter expresses an opinion that the IS-MND fails to analyze cumulative transportation impacts of last-mile delivery uses or projects.

The commenter does not identify specific cumulative transportation impacts that could result from the project and other nearby projects, such as the Duke Industrial Project mentioned by the commenter. However, the commenter notes that Clawiter Road runs between a regional airport and a major highway, which suggests that the commenter may be concerned with impacts on roadway congestion and traffic delays. As described on page 123 of the IS-MND, VMT is the metric by which significant transportation impacts are evaluated pursuant to SB 743 and State CEQA Guidelines Section 15064.3. Pursuant to State CEQA Guidelines Section 15064.3 traffic delay shall not constitute a significant environmental impact. Therefore, the project cannot result in a

significant cumulative environmental impact related to traffic congestion. As described on page 127 of the IS-MND, pursuant to the City's adopted VMT thresholds, the proposed project was screened out from further analysis because the project site is located in an area that is below the existing regional average VMT per employee. In other words, VMT generated by the project would be below the existing regional average, and not contribute toward a substantial increase in VMT or a significant cumulative VMT impact.

Additionally, while it is not entirely clear, this comment seems to suggest that the project would be used for a last-mile delivery facility. Please see the Topical Response in Section 2.1 regarding this misconception. No revisions to the IS-MND are necessary in response to this comment.

Response 3.5

The commenter expresses that the IS-MND fails to adequately address the transportation impacts of a last-mile facility and the provided mitigation measures to reduce VMT would not be effective for a last-mile facility or ecommerce use. Please see the Topical Response in Section 2.1 of this document. No revisions to the IS-MND are necessary in response to this comment.

Response 3.6

The commenter expresses an opinion that cumulative air quality impacts in regards to project emissions should be studied in conjunction with the nearby Duke Industrial Project.

This comment is similar to comment 3.1. Please see Response 3.1, above. For informational purposes, cumulative impacts in regard to air quality and greenhouse gas emissions are discussed on page 140 of the IS-MND. Therein it explains that the project was considered in relation to surrounding existing and proposed projects, which includes the Duke Industrial Project located close to the project site, and that the proposed project would not result in cumulatively considerable air quality impacts. Therefore, no revisions are necessary to the IS-MND in response to this comment.

Response 3.7

The commenter expresses that the City should reject the IS-MND and require a full EIR.

As described in the IS-MND, as well as each of the responses in this RTC document, the proposed project would not result in potentially significant impacts after implementation of the mitigation measures provided in the IS-MND. As demonstrated in responses 3.1 through 3.6, above, there is no evidence to suggest there would be a new significant impact or that the mitigation measures identified in the IS-MND would not reduce identified impacts to less than significant levels. Therefore, preparation of an EIR is not required.

LETTER 4

From: [Tiffany Ngo](#)
To: [Leigha Schmidt](#)
Subject: New Industrial Campus - 25450 & 25550 Clawiter Road Comment
Date: Monday, October 25, 2021 3:32:08 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Hi Leigha,

Please see below for my comment on the New Industrial Campus - 25450 & 25550 Clawiter Road Project.

The Hydrology and Water Quality section of the Initial Study does not adequately discuss and review the project's operational impacts on water quality. The stormwater pollutant controls proposed for the project are limited to treating the roofs and sidewalks. The project proponents neglect to consider how increased vehicular traffic associated with e-commerce operations will impact water quality in our waterways and water bodies. These activities are not limited to the project site and excluding them from environmental evaluation ignores well-documented, toxic stormwater pollutants tied to vehicles – whether aeriaily deposited from tailpipes, dripped from the vehicle body, or shed from tires. These pollutants are linked with declining aquatic organism health and populations, overall degradation of local waterways, and impacts to human health. Therefore, project proponents should implement stormwater treatment measures, such as the bioretention areas already proposed within the project footprint, along the surrounding and connected public Right of Way where a substantial increase in vehicular traffic is anticipated post-construction. The Initial Study's "Less Than Significant Impact" analysis does not evaluate the project's full effects, which will certainly c.(iii) "contribute runoff water which would...provide substantial additional sources of polluted runoff."

4.1

Please feel free to contact me if you have any questions or require additional questions. Thank you!

Best,
Tiffany

Letter 4

COMMENTER: Tiffany Ngo

DATE: October 25, 2021

Response 4.1

The commenter states an opinion that the Hydrology and Water Quality section of the IS-MND does not adequately discuss and review the project's potential impacts on water quality, specifically regarding stormwater pollutants released from vehicular traffic should the project site be used for ecommerce.

This comment is related to the project being used as an Amazon last-mile facility or similar ecommerce use, which is addressed in the Topical Response in Section 2.1 of this document. No revisions to the IS-MND are necessary in response to this comment.

Additionally, while this comment pertains to use of the site for ecommerce, it also pertains generally to water quality impacts resulting from the vehicle trips generated by the project, such as pollutants leaked from parked vehicles in the parking area of the project. As described on page 97 of the IS-MND, the project is designed to direct runoff from roofs and sidewalks into vegetated areas and would include approximately 44,268 square-feet of landscaped bioretention areas to treat runoff before entering the stormwater system. Additionally, the project would include storm drain inlets within the proposed parking areas. The inlets would capture runoff from parking surfaces and convey the runoff through buried pipes for discharge within the bioretention areas. The bioretention areas would provide an area for runoff to be treated through natural filtration to remove pollutants before discharge into the stormwater system. Accordingly, impacts would be less than significant, and no revisions to the IS-MND are required in response to this comment.

2.3 Amazon/ecommerce Use Comments

The following comment letters were submitted to the City and address a variety of environmental impacts, such as air quality impacts, energy impacts, GHG impacts, and transportation impacts. However, these comments are generally based on the project tenancy being an Amazon last-mile facility. As described in the Topical Response in Section 2.1, the project site is not proposed to be used for an Amazon last-mile facility or similar ecommerce use and would instead be utilized as industrial warehouses. Because the project would not involve an Amazon last-mile facility or other similar ecommerce use, the following comment letters are not applicable to the project and are adequately addressed in the topical Response.

Establishment of an Amazon last-mile facility (considered a Truck Terminal in the Zoning Ordinance) at the project site would be subject to a separate Conditional Use Permit and additional environmental review and approval process. In other words, use of the site for an Amazon last-mile facility or other similar ecommerce use would require additional CEQA and City approvals, at which time specific impacts of these uses would be evaluated and mitigated, as applicable. An opportunity for comment and public involvement would be available at that time, either in response to the additional CEQA document or at the hearing for the decision on issuing a Conditional Use Permit.



Mayor of Hayward and Hayward City Council
 777 B Street
 Hayward, CA 94541
 VIA EMAIL
List-Mayor-Council@hayward-ca.gov

September 17, 2021

Re: Comments on Amazon Last-Mile Delivery Warehouse Concept on Clawiter Road

Dear Mayor Halliday and Hayward City Councilmembers,

The Southern Alameda County (SAC) Group Executive Committee of the Sierra Club urges the city of Hayward and its associated department to conduct a full Environmental Impact Report as complies with the California Environmental Quality Act for the Amazon last-mile delivery warehouse concept on Clawiter Road.

The Council Economic Development Committee heard a preliminary concept review on May 27th, 2021 for this project on the former Berkeley Farms Site. Committee members raised several questions about the impacts of this project on the economics and environments of the local communities.

SAC represents Sierra Club members in Hayward and works in collaboration with labor and environmental justice partners who are concerned about an additional Amazon last-mile delivery warehouse being developed in Hayward. Due to the history of and on-going experiences of economic and environmental racism of BIPOC communities, we believe that an Amazon warehouse would add additional burdens to already overburdened communities, those burdens may include:

- Increased air pollution from fifty vans leaving every 30 minutes for 24 hours day;
- Damaged infrastructure from above van traffic;
- Increased air pollution from trucks bringing in commodities intended for delivery;
- Socioeconomic trends of suppressed wages associated with Amazon warehouse operations¹ and their targeted anti-union strategies²
- Amazon's tendency to not offer significant community benefits nor work with unions on project labor agreements;
- Impacts on the San Francisco Bay and its sensitive and important ecosystems;

¹ Janelle Jones and Ben Zipperer. "Unfulfilled promises: Amazon fulfillment centers do not generate broad-based employment growth." *Economic Policy Institute*, February 1, 2018, <https://www.epi.org/publication/unfulfilled-promises-amazon-warehouses-do-not-generate-broad-based-employment-growth/>.

² Roosevelt, Margot. "Teamsters vow to unionize Amazon, taking on an anti-union behemoth." *LA Times*, June 22, 2021, <https://www.latimes.com/business/story/2021-06-22/teamsters-mount-amazon-union-plan-warehouse-logistics>.



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- Impacts from and planning for sea level rise and resilience strategies, as referenced in the Hayward Area Shoreline Planning Agency's Shoreline Adaptation Master Plan.

We ask that these and *any other potential impacts* be explored through a complete EIR that is distinct and separate from any other EIRs that have conducted for any similar projects. We must remind the Mayor and the City Council the burdens of environmental injustices are cumulative. We urge you to undertake these processes and direct your departments to follow the essential and legal pathways for project development.

Sincerely,

Martha H Kreeger

Martha Kreeger
Chair, Southern Alameda County Group
Sierra Club, San Francisco Bay Chapter

Cc:
Virginia Reinhart
Chapter Director, Sierra Club, SF Bay Chapter

Labor leaders

EJ/Community groups

Leigha Schmidt

From: Julie Machado Sent You a Personal Message
Sent: Thursday, October 21, 2021 7:26 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Please do what is best for the environment and residents, not for corporations.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Julie Machado

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Natalie Forrest Sent You a Personal Message
Sent: Thursday, October 21, 2021 7:14 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Please consider first the well-being of the residents of Hayward, rather than that of a giant company. We are depending on you!

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Natalie Forrest

Sincerely,

Natalie Forrest

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Leigha Schmidt

From: Gerard Ridella Sent You a Personal Message
Sent: Thursday, October 21, 2021 7:01 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

These are very impacted roadways already, more vehicles are not an answer.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Gerard Ridella

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Leigha Schmidt

From: David Thomas Sent You a Personal Message

Sent: Thursday, October 21, 2021 6:56 PM

To: Leigha Schmidt

Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely, DAVID THOMAS

Sincerely,

David Thomas

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Leigha Schmidt

From: Carolyn Hedgecock Sent You a Personal Message
 Thursday, October 21, 2021 6:53 PM
Sent: Leigha Schmidt
To: Conduct a Full Environmental Review for Amazon Warehouse Development
Subject:

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Carolyn Hedgecock

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Leigha Schmidt

From: James Fish Sent You a Personal Message
Sent: Thursday, October 21, 2021 5:28 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

James Fish

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Leigha Schmidt

From: Dana Katofsky Sent You a Personal Message
 Thursday, October 21, 2021 5:16 PM
Sent: Leigha Schmidt
To: Conduct a Full Environmental Review for Amazon Warehouse Development
Subject:

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Environmental Planning, is textbook. Environmental politics impacts every commission vote. An environmental impact study is a requirement for planners and planning commissions prior to approving or denying any project. The Hayward, Planning Commission, and the affected community deserve to be heard before an approval is issued.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Dana Katofsky

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Leigha Schmidt

From: Rebecca Wong Sent You a Personal Message
 Thursday, October 21, 2021 4:41 PM
Sent: Leigha Schmidt
To: Conduct a Full Environmental Review for Amazon Warehouse Development
Subject:

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Rebecca Wong

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Leigha Schmidt

From: Timothy Lajoie Sent You a Personal Message
Sent: Thursday, October 21, 2021 4:24 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

We already have to contend with the power plant that was forced upon us and recently exploded without proper review and response. Please send a strong message that Hayward is not to be pushed around and that we take our environmental responsibilities seriously. Please follow the laws that are in place to make sure that the environment and public safety are first and foremost.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Timothy Lajoie

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Leigha Schmidt

From: Ernie Walters Sent You a Personal Message
Sent: Thursday, October 21, 2021 4:17 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Ernie Walters

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Leigha Schmidt

From: Richard Yates Sent You a Personal Message
 Thursday, October 21, 2021 4:12 PM
Sent: Leigha Schmidt
To: Conduct a Full Environmental Review for Amazon Warehouse Development
Subject:

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Richard Yates

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Leigha Schmidt

From: Glen Deardorff Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:58 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Glen Deardorff

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Leigha Schmidt

From: Carol Mock Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:54 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Carol Mock

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Leigha Schmidt

From: Jaspreet Singh Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:49 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Jaspreet Singh

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Leigha Schmidt

From: Carolyn Wheeler Sent You a Personal Message

Sent: Thursday, October 21, 2021 3:47 PM

To: Leigha Schmidt

Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Carolyn Wheeler

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Leigha Schmidt

From: D. Dunn Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:46 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

D. Dunn

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Leigha Schmidt

From: Kerri Mcgoldrick Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:39 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Kerri Mcgoldrick

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Leigha Schmidt

From: Ruth Wenzel Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:36 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

In this day, how can anything as big as an Amazon warehouse Not be subjected to a full EIR and EIS?

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Ruth Wenzel

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Leigha Schmidt

From: Ryan Phillips Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:31 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

As a Hayward resident it's necessary to hold corporations environmentally accountable.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Ryan Phillips

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Barry Brown Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:30 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Conduct the review!

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Barry Brown

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Richard Tapia Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:27 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Richard Tapia

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Ernie Walters Sent You a Personal Message

Sent: Thursday, October 21, 2021 3:27 PM

To: Leigha Schmidt

Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Ernie Walters

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: SRIKANTH MADDURI Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:17 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Please keep Amazon honest and accountable before providing permits. I am all for new jobs but please conduct due diligence.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

SRIKANTH MADDURI

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Gregory Fite Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:13 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Hayward is my home town, and I expect all development to be helpful, not harmful to my community.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Gregory Fite

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Jillian Vanluchem Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:10 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Jillian Vanluchem

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Luis Hernandez Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:08 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Luis Hernandez

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Patricia Mahoney Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:05 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Patricia Mahoney

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: Jean Bidwell Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:03 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Jean Bidwell

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

Leigha Schmidt

From: John Payne Sent You a Personal Message
Sent: Thursday, October 21, 2021 3:03 PM
To: Leigha Schmidt
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I live within a couple of miles of this facility, in south San Lorenzo.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

John Payne

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Joanna Smiley
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Thursday, October 21, 2021 8:22:33 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Joanna Smiley

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Rebecca Helems
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Thursday, October 21, 2021 8:20:00 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Rebecca Helems

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From: Natalie Bright
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Friday, October 22, 2021 1:13:07 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Hayward has been neglected for a long time. Roads and businesses are in great disrepair.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Natalie Bright

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Hilary Danehy
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Friday, October 22, 2021 12:03:15 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Hilary Danehy

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Timothy Devine
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Thursday, October 21, 2021 10:04:49 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Amazon kills small businesses ... keep them out of Hayward!

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Timothy Devine

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From: Janet Dutra
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Thursday, October 21, 2021 9:46:11 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Janet Dutra

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From: Sue Hall
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Thursday, October 21, 2021 9:46:00 PM

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Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Sue Hall

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Beverly Dahlstedt
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Thursday, October 21, 2021 9:38:06 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

It's my community, and I don't want to see it be unhealthy.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Beverly Dahlstedt

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Saundra Hodges
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Sunday, October 24, 2021 6:28:51 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

As a close neighbor to Hayward, a place where I have many friends and favorite businesses, I urge you to make sure this proposal is thoroughly vetted. Hayward has always impressed me with its forward thinking respect for its multi-cultural citizens and this is one more way to show Hayward residents they deserve this consideration

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Saundra Hodges

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From: Sidhant Karamchandani
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Sunday, October 24, 2021 3:23:12 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

Please conduct a thorough review. The negative side effects could outweigh the positive economic benefits.

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Sidhant Karamchandani

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Christopher Ware
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Friday, October 22, 2021 12:58:35 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Christopher Ware

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Shaun Martinez
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Saturday, October 23, 2021 8:47:18 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Shaun Martinez

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Ray Lorenson
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Friday, October 22, 2021 1:35:50 PM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

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Sincerely,

Sincerely,

Ray Lorenson

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From: Debbie Dettmer
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Friday, October 22, 2021 11:04:32 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Debbie Dettmer

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Bruce Dughi
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Friday, October 22, 2021 8:22:34 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Bruce Dughi

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Christy Trombley
To: [Leigha Schmidt](#)
Subject: Conduct a Full Environmental Review for Amazon Warehouse Development
Date: Friday, October 22, 2021 7:16:56 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Ms. Leigha Schmidt,

I am concerned that the development at the old Berkeley Farms Site at 25550 and 25450 Clawiter Road (APN: 439-0080-001-00 and 439-0080-003-14) has not received adequate analysis. If this warehouse becomes a last-mile delivery station for Amazon, I'm worried that the air quality in Hayward will worsen, that the roads will break down, and that workers will not get paid enough.

Please deny the adoption of the Mitigated Negative Declaration and conduct an Environmental Impact Review under CEQA that includes a more robust air quality assessment, a traffic study, and a more robust economic impact analysis. Hayward deserves proper mitigations and community benefits. Economic development needs to include everyone without negatively impacting public health and the environment.

Sincerely,

Sincerely,

Christy Trombley

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club San Francisco Bay Chapter. If you need more information, please contact Elizabeth Hall at Sierra Club San Francisco Bay Chapter at elizabeth.hall@sierraclub.org or (510) 848-0800.

From: Kate Amon
To: [Leigha Schmidt](#)
Subject: IS-MND Comment: Amazon, Go Solar!
Date: Monday, October 25, 2021 9:52:04 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Leigha Schmidt,

I am writing today to urge that solar panels are installed on all of Amazon's warehouses, including at the new industrial campus at 25450 & 25550 CLAWITER ROAD (FORMER BERKELEY FARMS SITE).

Amazon's warehouses are some of the largest in the world, taking up more than 70 million square feet in the United States alone. If they place solar panels on their warehouses, that could power up to 100,000 homes.

Thank you for your attention to this important matter.

Sincerely,

- Kate Amon

From: Carol Drake
To: [Leigha Schmidt](#)
Subject: New Industrial Campus 25450 & 25550 Clawiter Road in Hayward, CA
Date: Monday, October 25, 2021 10:33:41 AM

CAUTION: This is an external email. Do not click on links or open attachments unless you know the content is safe.

Dear Leigha Schmidt,

I am writing you today to urge you to include 100% electric vehicles (EVs) at the proposed Amazon warehouses at the industrial campus at 25450 & 25550 Clawiter Road in Hayward.

Also I am urging that you include solar panels on these proposed Amazon's warehouses. Amazon's warehouses are some of the largest in the world, taking up more than 70 million square feet in the United States alone. If they place solar panels on their warehouses, that could power up to 100,000 homes.

Thank you

Carol Drake

Leigha Schmidt, AICP, Senior Planner
City of Hayward, 777 B St., Hayward, CA 94541

Appendix 1

Supplemental CalEEMod Datasheets: Construction Haul Trips

Haul Truck Emissions - Alameda County, Winter

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

Haul Truck Emissions
Alameda County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	387.30	1000sqft	8.89	387,300.00	0
Parking Lot	775.00	Space	11.65	310,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	63
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MW hr)	203.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

- Project Characteristics -
- Land Use - Quantifying Haul Trip Estimates. Data based on original inputs
- Construction Phase - Based on Grading Phase from original analysis
- Off-road Equipment - Estimation of haul trips only
- Grading - Total acres graded set to equal what was in the original analysis

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	35.00	41.00
tblConstructionPhase	PhaseEndDate	10/29/2021	11/18/2021
tblConstructionPhase	PhaseStartDate	9/11/2021	9/23/2021
tblGrading	AcresOfGrading	0.00	123.00

Haul Truck Emissions - Alameda County, Winter

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

tblGrading	MaterialImported	0.00	552.00
tblLandUse	LotAcreage	6.97	11.65
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00

2.0 Emissions Summary

Summary not used

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	9/23/2021	11/18/2021	5	41	

Acres of Grading (Site Preparation Phase): 0**Acres of Grading (Grading Phase): 123****Acres of Paving: 11.65****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Excavators	0	8.00	158	0.38
Grading	Graders	0	8.00	187	0.41
Grading	Rubber Tired Dozers	0	8.00	247	0.40
Grading	Scrapers	0	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	0	8.00	97	0.37

Haul Truck Emissions - Alameda County, Winter

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	0	0.00	0.00	69.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction**3.2 Grading - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.1830	0.0000	3.1830	0.3438	0.0000	0.3438			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000	3.1830	0.0000	3.1830	0.3438	0.0000	0.3438		0.0000	0.0000	0.0000		0.0000

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Haul Truck Emissions - Alameda County, Winter

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

Hauling	0.0113	0.3270	0.0679	1.0800e-003	0.0295	4.4000e-003	0.0339	8.0800e-003	4.2100e-003	0.0123		116.3491	116.3491	2.5900e-003	0.0184	121.8886
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0113	0.3270	0.0679	1.0800e-003	0.0295	4.4000e-003	0.0339	8.0800e-003	4.2100e-003	0.0123		116.3491	116.3491	2.5900e-003	0.0184	121.8886

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.1830	0.0000	3.1830	0.3438	0.0000	0.3438			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000	3.1830	0.0000	3.1830	0.3438	0.0000	0.3438	0.0000	0.0000	0.0000	0.0000		0.0000

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Haul Truck Emissions - Alameda County, Winter

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Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0113	0.3270	0.0679	1.0800e-003	0.0295	4.4000e-003	0.0339	8.0800e-003	4.2100e-003	0.0123		116.3491	116.3491	2.5900e-003	0.0184	121.8886

4.0 Operational Detail - Mobile

Operations modeled in the original analysis

Haul Truck Emissions - Alameda County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**Haul Truck Emissions
Alameda County, Summer****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	387.30	1000sqft	8.89	387,300.00	0
Parking Lot	775.00	Space	11.65	310,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	63
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MW hr)	203.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Quantifying Haul Trip Estimates. Data based on original inputs

Construction Phase - Based on Grading Phase from original analysis

Off-road Equipment - Estimation of haul trips only

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Table Name	Column Name	Default Value	New Value
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Haul Truck Emissions - Alameda County, Summer

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

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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
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2.0 Emissions Summary

Summary not used

3.0 Construction Detail**Construction Phase**

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
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Grading	Scrapers	0	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	0	8.00	97	0.37

Haul Truck Emissions - Alameda County, Summer

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

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Grading	0	0.00	0.00	69.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction**3.2 Grading - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.1830	0.0000	3.1830	0.3438	0.0000	0.3438			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000	3.1830	0.0000	3.1830	0.3438	0.0000	0.3438		0.0000	0.0000	0.0000		0.0000

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Haul Truck Emissions - Alameda County, Summer

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

Hauling	0.0115	0.3099	0.0667	1.0800e-003	0.0295	4.3900e-003	0.0339	8.0800e-003	4.2000e-003	0.0123		116.3193	116.3193	2.6000e-003	0.0184	121.8573
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0115	0.3099	0.0667	1.0800e-003	0.0295	4.3900e-003	0.0339	8.0800e-003	4.2000e-003	0.0123		116.3193	116.3193	2.6000e-003	0.0184	121.8573

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.1830	0.0000	3.1830	0.3438	0.0000	0.3438			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000
Total	0.0000	0.0000	0.0000	0.0000	3.1830	0.0000	3.1830	0.3438	0.0000	0.3438	0.0000	0.0000	0.0000	0.0000		0.0000

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Haul Truck Emissions - Alameda County, Summer

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

Hauling	0.0115	0.3099	0.0667	1.0800e-003	0.0295	4.3900e-003	0.0339	8.0800e-003	4.2000e-003	0.0123		116.3193	116.3193	2.6000e-003	0.0184	121.8573
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0115	0.3099	0.0667	1.0800e-003	0.0295	4.3900e-003	0.0339	8.0800e-003	4.2000e-003	0.0123		116.3193	116.3193	2.6000e-003	0.0184	121.8573

4.0 Operational Detail - Mobile

Operations modeled as part of the original analysis