CITY OF FRESNO

MITIGATED NEGATIVE DECLARATION

Notice of Intent was filed with:

FRESNO COUNTY CLERK
2221 Kern Street
Fresno, California 93721

on

May 29, 2014

The full Initial Study and the Master Environmental Impact Report No. 10130 are on file in the Development and Resource Management Department,
Fresno City Hall, 3rd Floor
2600 Fresno Street
Fresno, California 93721
(559) 621-8277

ENVIRONMENTAL ASSESSMENT NUMBER:

S-13-047

APPLICANT:

GMA Consulting Engineers and Architects
7337 North First Street, Suite 110
Fresno, CA 93720

PROJECT LOCATION:

± 11.22 acres of property located on the west side of North Hughes Avenue between West Nielson and West Belmont Avenues, in the City and County of Fresno, California

36°44'41.9748" N Latitude, - 119°50'8.052" W Longitude

Assessor's Parcel Number: 458-020-70

PROJECT DESCRIPTION:

Site Plan Review Application No. S-13-047 was filed by GMA Consulting Engineers and Architects on behalf of McCall Pacific, LLC, and pertains to an 11.63 acre property located on the west side of North Hughes Avenue between West Nielson and West Belmont Avenues. The applicant requests authorization to construct a 53,787 square foot metal building to be used as a chemical warehouse. A portion of which will be used as a 3,000 square foot shipping office and a 181 square foot front entry canopy, in addition to, two detached storage canopies (2,000 and 2,500 square feet). The applicant also proposes to install twelve (12) external storage tanks with their appropriate containment slabs. The property is zoned M-3 (Heavy Industrial District).

The City of Fresno has conducted an initial study and proposes to adopt a Mitigated Negative Declaration for the above-described project. The environmental analysis contained in the Initial Study and this Mitigated Negative Declaration is tiered from Master Environmental Impact Report No. 10130 (SCH # 2001071097) prepared for the 2025 Fresno General Plan ("MEIR"); and, Mitigated Negative Declaration No. A-09-02 (SCH # 2009051016) prepared for the 2025 Fresno General Plan ("Air Quality MND"). A copy of the MEIR and Air Quality MND may be reviewed in the City of Fresno Development and Resource Management Department as noted above. The proposed project has been determined to be a subsequent project that is not fully within the scope of the Master Environmental Impact Report No. 10130 ("MEIR) or Mitigated Negative Declaration No. A-09-02 (Air Quality MND) prepared for the 2025 Fresno General Plan. Pursuant to Public Resources Code § 21157.1 and California Environmental Quality Act (CEQA) Guidelines § 15177, this project has been evaluated with respect to each item on the attached environmental checklist to determine whether this project may cause any additional significant effect on the environment which was not previously examined in the MEIR. After conducting a review of the adequacy of the MEIR pursuant to Public

Resources Code, Section 21157.6(b)(1), the Development and Resource Management Department, as lead agency, finds that no substantial changes have occurred with respect to the circumstances under which the MEIR was certified and that no new information, which was not known and could not have been known at the time that the MEIR was certified as complete, has become available.

This completed environmental impact checklist form, its associated narrative, and proposed mitigation measures reflect applicable comments of responsible and trustee agencies and research and analysis conducted to examine the interrelationship between the proposed project and the physical environment. The information contained in the project application and its related environmental assessment application, responses to requests for comment, checklist, initial study narrative, and any attachments thereto, combine to form a record indicating that an initial study has been completed in compliance with the State CEQA Guidelines and the CEQA.

All new development activity and many non-physical projects contribute directly or indirectly toward cumulative impacts on the physical environment. It has been determined that the incremental effect contributed by this project toward cumulative impacts is not considered substantial or significant in itself, and/or that cumulative impacts accruing from this project may be mitigated to less than significant with application of feasible mitigation measures.

Based upon the evaluation guided by the environmental checklist form, it was determined that there are foreseeable impacts from the Project that are additional to those identified in the MEIR, and/or impacts which require mitigation measures not included in the MEIR Mitigation Measure Checklist.

The completed environmental checklist form indicates whether an impact is potentially significant, less than significant with mitigation, or less than significant.

For some categories of potential impacts, the checklist may indicate that a specific adverse environmental effect has been identified which is of sufficient magnitude to be of concern. Such an effect may be inherent in the nature and magnitude of the project, or may be related to the design and characteristics of the individual project. Effects so rated are not sufficient in themselves to require the preparation of an Environmental Impact Report, and have been mitigated to the extent feasible. With the project specific mitigation imposed, there is no substantial evidence in the record that this project may have additional significant, direct, indirect or cumulative effects on the environment that are significant and that were not identified and analyzed in the MEIR. Both the MEIR mitigation checklist measures and the project-specific mitigation checklist measures will be imposed on this project.

The initial study has concluded that the proposed project will not result in any adverse effects which fall within the "Mandatory Findings of Significance" contained in Section 15065 of the State CEQA Guidelines.

The finding is, therefore, made that the proposed project will not have a significant adverse effect on the environment.

PREPARED BY: Nathan Bouvet, Planner III	SUBMITTED BY:
DATE: May 29, 2014	Bonique Emerson, Supervising Planner DEVELOPMENT & RESOURCE MANAGEMENT DEPARTMENT
Attachments:	-Notice of Intent -Initial Study Impact Checklist and Initial Study (Appendix G)

	-Master Environmental Impact Report Review Summary -Master Environmental Impact Report No. 10130-2025 Fresno General Plan Mitigation Monitoring Checklist dated May 29, 2014 -Project Specific Mitigation Monitoring Checklist dated May 29, 2014 -Summary Review Letter – San Joaquin Valley Air Pollution Control District -Air Quality Analysis -Brenntag Pacific, LLC. Summary of S.H.E Programs -Department of Transportation Hazard Class Chemicals -Fire Code Hazard Class Chemicals -List of subcontractors

Notice of Intent

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CITY OF FRESNO

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

EA No. S-13-047

Site Plan Review Application No. S-13-047.

APPLICANT:
Sean Odom
GMA Consulting Engineers
7337 North First Street, Suite 110
Fresno, CA 93720

PROJECT LOCATION:

± 11.63 acres of property located on the west side of North Hughes Avenue between West Nielson and West Belmont Avenues, in the City and County of Fresno, California

36°44'41.9748" N Latitude, - 119°50'8.052" W Longitude

Assessor's Parcel Number: 458-020-70

Filed with:

FILED

MAY 27 2014

FRESNO COUNTY CLERK
By Victoria L. Villegas DEPUTY

FRESNO COUNTY CLERK
2221 Kern Street, Fresno, CA 93721

PROJECT DESCRIPTION:

Site Plan Review Application No. S-13-047 was filed by GMA Consulting Engineers and Architects on behalf of McCall Pacific, LLC, and pertains to an 11.63 acre property located on the west side of North Hughes Avenue between West Nielson and West Belmont Avenues. The applicant requests authorization to construct a 53,787 square foot metal building to be used as a chemical warehouse. A portion of which will be used as a 3,000 square foot shipping office and a 181 square foot front entry canopy, in addition to, two detached storage canopies (2,000 and 2,500 square feet). The applicant also proposes to install twelve (12) external storage tanks with their appropriate containment slabs. The property is zoned M-3 (Heavy Industrial District).

The City of Fresno has conducted an initial study of the above-described project and it has been determined to be a subsequent project that is not fully within the scope of the Master Environmental Impact Report No. 10130 (MEIR) prepared for the 2025 Fresno General Plan (SCH # 2001071097) and Mitigated Negative Declaration prepared for Plan Amendment No. A-09-02 (SCH # 2009051016) (Air Quality MND). Therefore, the Development and Resource Management Department proposes to adopt a Mitigated Negative Declaration for this project.

With the project specific mitigation imposed, there is no substantial evidence in the record that this project may have additional significant, direct, indirect or cumulative effects on the environment that are significant and that were not identified and analyzed in the MEIR or Air Quality MND. After conducting a review of the adequacy of the MEIR and Air Quality MND pursuant to Public Resources Code, Section 21157.6(b)(1), the Development and Resource Management Department, as lead agency, finds that no substantial changes have occurred with respect to the circumstances under which the MEIR was certified and the Air Quality MND was adopted and that no new information, which was not known and could not have been known at the time that the MEIR was certified as complete and the Air Quality MND was adopted, has become available. The project is not located on a site which is included on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to, lists of hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites and others, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that Section.

Additional information on the proposed project, including the MEIR, Air Quality MND, proposed environmental finding of a mitigated negative declaration and the initial study may be obtained from the Development and Resource Management Department, Fresno City Hall, 2600 Fresno Street, 3rd Floor Fresno, California 93721-3604, or for an electronic copy of the environmental finding, and for additional information on the project, please contact Nathan Bouvet at (559) 621-8075 for more information.

ANY INTERESTED PERSON may comment on the proposed environmental finding. Comments must be in writing and must state (1) the commentor's name and address; (2) the commentor's interest in, or relationship to, the project; (3) the environmental determination being commented upon; and (4) the specific reason(s) why the proposed environmental determination should or should not be made. Any comments may be submitted at any time between the publication date of this notice and close of business on June 18, 2014. Please direct comments to Nathan Bouvet, Planner, City of Fresno Development and Resource Management Department, City Hall, 2600 Fresno Street, Room 3076, Fresno, California, 93721-3604; or by email to Nathan.Bouvet@fresno.gov; or comments can be sent by facsimile to (559) 498-1026.

These development applications and this proposed environmental finding have been scheduled to be heard by the Planning Commission on June 18, 2014 at 6:00 p.m. or thereafter. The hearing will be held in the Fresno City Council Chambers located at Fresno City Hall, 2nd Floor, 2600 Fresno Street, Fresno, California, 93721. Your written and oral comments are welcomed at the hearing and will be considered in the final decision.

INITIAL STUDY PREPARED BY: Nathan Bouvet, Planner III	SUBMITTED BY: Bonique Emerson, Supervising Planner CITY OF FRESNO DEVELOPMENT AND RESOURCE MANAGEMENT DEPARTMENT
DATE: May 27, 2014	

CAO033010

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Appendix G

MODIFIED APPENDIX G TO ANALYZE SUBSEQUENT PROJECT IDENTIFIED IN MEIR NO. 10130 / MND FOR PLAN AMENDMENT A-09-02 (AIR QUALITY MND) / INITIAL STUDY

Environmental Checklist Form
For Environmental Assessment No. S-13-047

May 29, 2014

1.	Project title: North Hughes Plant for Brentag Pacific, Inc., Site Plan Review Application No. S-13-047
2.	Lead agency name and address: City of Fresno Development and Resource Management Department 2600 Fresno Street Fresno, CA 93721
3.	Contact person and phone number: Nathan Bouvet, Planner III (559) 621-8075
4.	Project location: 175 North Hughes Avenue S/A; located on the west side of North Hughes Avenue between West Nielson and West Belmont Avenues. Assessor's Parcel Number: 458-020-70 36º 44' 41.9748" N Latitude, 119º 50' 8.052" W Longitude
5.	Project sponsor's name and address: GMA Consulting Engineers 7337 North First Street, Suite 110 Fresno, CA 93720
6.	General plan designation: Heavy Industrial Planned Land Use
7.	Zoning: Existing- M-3 (Heavy Industrial District)
8.	Description of project: Site Plan Review Application No. S-13-047 was filed by GMA Consulting Engineers and Architects on behalf of McCall Pacific, LLC, and pertains to an 11.63 acre property located on the west side of North Hughes Avenue between West Nielson and West Belmont Avenues. The applicant requests authorization to construct a 53,787 square foot metal building to be used as a chemical warehouse. A portion of which will be used as a 3,000 square foot shipping office and a 181 square foot front entry canopy, in addition to, two detached storage canopies (2,000 and 2,500 square feet). The applicant also proposes to install twelve (12) external storage tanks with their appropriate containment slabs.

9.	Surrounding land uses and setting: (Briefly describe the project's surroundings)

	Planned Land Use	Existing Zoning	Existing Land Use
North	Open Space	**AL-20** *Agricultural Limited (County)*	Railroad Tracks
South	Heavy Industrial	**M-3** *Heavy Industrial District*	Industrial
East	Open Space- cemetery	**AE-20** *Exclusive Twenty Acre Agricultural District*	Cemetery
West	Heavy Industrial	**M-3** *Heavy Industrial District*	Industrial

10.	Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): Fresno Metropolitan Flood Control District, City of Fresno Building and Safety Division, County of Fresno Department of Public Health, and the San Joaquin Valley Air Pollution Control District.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

Pursuant to Public Resources Code Section 21157.1(b) and CEQA Guidelines 15177(b)(2), the purpose of this MEIR initial study is to analyze whether the subsequent project was described in the Master Environmental Impact Report No. 10130 and whether the subsequent project may cause any additional significant effect on the environment, which was not previously examined in MEIR No. 10130 ("MEIR") or the Mitigated Negative Declaration prepared for Plan Amendment A-09-02 to amend the Air Quality Element of the 2025 Fresno General Plan (SCH # 2009051016) ("Air Quality MND").

The environmental factors checked below (if any) would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

_____ Aesthetics	_____ Agriculture and Forestry Resources	_____ Air Quality
_____ Biological Resources	_____ Cultural Resources	_____ Geology /Soils
_____ Greenhouse Gas Emissions	_____ Hazards & Hazardous Materials	_____ Hydrology/Water Quality
_____ Land Use/Planning	_____ Mineral Resources	_____ Noise

____ Population /Housing	____ Public Services	____ Recreation
____ Transportation/Traffic	____ Utilities/Service Systems	____ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

____ I find that the proposed project is a subsequent project identified in the MEIR and that it is fully within the scope of the MEIR and Air Quality MND because it would have no additional significant effects that were not examined in the MEIR or the Air Quality MND such that no new additional mitigation measures or alternatives may be required. All applicable mitigation measures contained in the Mitigation Monitoring Checklist shall be imposed upon the proposed project. A FINDING OF CONFORMITY will be prepared.

__X__ I find that the proposed project is a subsequent project identified in the MEIR and Air Quality MND but that it is not fully within the scope of the MEIR and Air Quality MND because the proposed project could have a significant effect on the environment that was not examined in the MEIR or Air Quality MND. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. The project specific mitigation measures and all applicable mitigation measures contained in the MEIR Mitigation Monitoring Checklist will be imposed upon the proposed project. A MITIGATED NEGATIVE DECLARATION will be prepared.

____ I find that the proposed project is a subsequent project identified in the MEIR but that it MAY have a significant effect on the environment that was not examined in the MEIR or Air Quality MND, and an ENVIRONMENTAL IMPACT REPORT is required to analyze the potentially significant effects not examined in the MEIR or Air Quality MND pursuant to Public Resources Code Section 21157.1(d) and CEQA Guidelines 15178(a).

Signature

5/29/2014
Date

EVALUATION OF ADDITIONAL ENVIRONMENTAL IMPACTS NOT ASSESSED IN THE MEIR or Air Quality MND:

1. For purposes of this MEIR Initial Study, the following answers have the corresponding meanings:
   a. "No Impact" means the subsequent project will not cause any additional significant effect related to the threshold under consideration which was not previously examined in the MEIR or Air Quality MND.

   b. "Less Than Significant Impact" means there is an impact related to the threshold under

consideration that was not previously examined in the MEIR or Air Quality MND, but that impact is less than significant;

c. "Less Than Significant with Mitigation Incorporation" means there is a potentially significant impact related to the threshold under consideration that was not previously examined in the MEIR or Air Quality MND; however, with the mitigation incorporated into the project, the impact is less than significant.

d. "Potentially Significant Impact" means there is an additional potentially significant effect related to the threshold under consideration that was not previously examined in the MEIR or Air Quality MND.

2. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

3. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

4. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

5. A "Finding of Conformity" is a determination based on an initial study that the proposed project is a subsequent project identified in the MEIR and that it is fully within the scope of the MEIR and Air Quality MND because it would have no additional significant effects that were not examined in the MEIR or the Air Quality MND.

6. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

7. Earlier analyses may be used where, pursuant to the tiering, program EIR or MIER, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in the MEIR or another earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

8. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

9. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

10. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

11. The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impact to less than significance

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?				x
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				x
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				x
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			x	

The immediate area is substantially developed with urban uses; therefore, no public or scenic vista will be obstructed by the development and no valuable vegetation will be removed. The project will not damage any scenic resources nor will it degrade the visual character or quality of the site and its surroundings. Furthermore, development of the site will not create a new source of substantial light or glare which would

affect day or night time views in the project area, given that during the entitlement process, staff will ensure that lights are located in areas that will minimize light sources to the neighboring properties. The site will have a wide landscape buffer along the east and a portion of the north and south property lines which will shield the proposed operations from public view. In addition, the building proposed will contain architectural features and colors (i.e., windows and window treatments, metal wall sheathing and stucco variations, rake trims and guard rails), that will be more aesthetically appealing than the other industrial buildings in the immediate vicinity of the subject site. The project will be subject to the aesthetics mitigation measures identified in MEIR No. 10130 prepared for the 2025 Fresno General Plan and on the attached Mitigation Monitoring Checklist dated May 29, 2014. Conditions to ensure the project is aesthetically appealing will be further defined in the Conditions of Approval for Site Plan Review Application No. S-13-047. As a result, the project will have a less than significant impact on aesthetics.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. -- Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				x
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				x
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				x
d) Result in the loss of forest land or conversion of forest land to non-forest use?				x

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?				x

The project will not Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use because the project is not located on said areas. In addition, based on a review of aerial photographs, it appears that the site has not been under cultivation since at least 1992. The site does not have a Williamson Act as verified by the City of Fresno and associated historical documentation. The proposed project will not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. The project will not result in the loss of forest land or conversion of forest land to non-forest use because the subject property does not contain forest land. The proposed project is not expected to result in conversion of farmland to a non-agricultural use because the subject site is in a completely urban area and is designated for urban development by the 2025 Fresno General Plan. Although there are some properties in the immediate vicinity that are zoned for agricultural uses (cemetery to the east), the proposed project area has already been developed with industrial uses for at least 30 years.

ENVIRONMENTAL ISSUES	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
III. AIR QUALITY - (Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.) -- Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan (*e.g.*, by having potential emissions of regulated criterion pollutants which exceed the San Joaquin Valley Air Pollution Control Districts (SJVAPCD) adopted thresholds for these pollutants)?			x	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				x
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				x
d) Expose sensitive receptors to substantial pollutant concentrations?			x	

e) Create objectionable odors affecting a substantial number of people?				X

Setting

The subject site is located in Fresno County and within the San Joaquin Valley Air Basin (SJVAB). This region has had chronic non-attainment of federal and state clean air standards for ozone/oxidants and particulate matter due to a combination of topography and climate. The San Joaquin Valley (Valley) is hemmed in on three sides by mountain ranges, with prevailing winds carrying pollutants and pollutant precursors from urbanized areas to the north (and in turn contributing pollutants and precursors to downwind air basins). The Mediterranean climate of this region, with a high number of sunny days and little or no measurable precipitation for several months of the year, fosters photochemical reactions in the atmosphere, creating ozone and particulate matter.

Regional factors affect the accumulation and dispersion of air pollutants within the SJVAB.

Air pollutant emissions overall are fairly constant throughout the year, yet the concentrations of pollutants in the air vary from day to day and even hour to hour. This variability is due to complex interactions of weather, climate, and topography. These factors affect the ability of the atmosphere to disperse pollutants. Conditions that move and mix the atmosphere help disperse pollutants, while conditions that cause the atmosphere to stagnate allow pollutants to concentrate. Local climatological effects, including topography, wind speed and direction, temperature, inversion layers, precipitation, and fog can exacerbate the air quality problem in the SJVAB.

The SJVAB is approximately 250 miles long and averages 35 miles wide, and is the second largest air basin in the state. The SJVAB is defined by the Sierra Nevada in the east (8,000 to 14,000 feet in elevation), the Coast Ranges in the west (averaging 3,000 feet in elevation), and the Tehachapi mountains in the south (6,000 to 8,000 feet in elevation). The Valley is basically flat with a slight downward gradient to the northwest. The Valley opens to the sea at the Carquinez Straits where the San Joaquin-Sacramento Delta empties into San Francisco Bay. The Valley, thus, could be considered a “bowl” open only to the north.

During the summer, wind speed and direction data indicate that summer wind usually originates at the north end of the Valley and flows in a south-southeasterly direction through the Valley, through Tehachapi pass, into the Southeast Desert Air Basin. In addition, the Altamont Pass also serves as a funnel for pollutant transport from the San Francisco Bay Area Air Basin into the region.

During the winter, wind speed and direction data indicate that wind occasionally originates from the south end of the Valley and flows in a north-northwesterly direction. Also during the winter months, the Valley generally experiences light, variable winds (less than 10 mph). Low wind speeds, combined with low inversion layers in the winter, create a climate conducive to high carbon monoxide (CO) and particulate matter (PM10 and PM2.5) concentrations. The SJVAB has an “Inland Mediterranean” climate averaging over 260 sunny days per year. The Valley floor is characterized by warm, dry summers and cooler winters. For the entire Valley, high daily temperature readings in summer average 95ºF. Temperatures below freezing are unusual. Average high temperatures in the winter are in the 50s, but highs in the 30s and 40s can occur on days with persistent fog and low cloudiness. The average daily low temperature is 45ºF.

The vertical dispersion of air pollutants in the Valley is limited by the presence of persistent temperature inversions. Solar energy heats up the Earth's surface, which in turn radiates heat and warms the lower atmosphere. Therefore, as altitude increases, the air temperature usually decreases due to increasing distance from the source of heat. A reversal of this atmospheric state, where the air temperature increases with height, is termed an inversion. Inversions can exist at the surface or at any height above the ground, and tend to act as a lid on the Valley, holding in the pollutants that are generated here.

Regulations

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the local regional jurisdictional entity charged with attainment planning, rule making, rule enforcement, and monitoring under Federal and State Clean Air Acts and Clean Air Act Amendments.

The proposed project will comply with the Air Quality Element of the 2025 Fresno General Plan and the Goals, Policies and Objectives of the Regional Transportation Plan adopted by the Fresno Council of Fresno County Governments; therefore the project will not conflict with or obstruct an applicable air quality plan. The project must comply with the construction and development requirements of the San Joaquin Valley Air Pollution Control District, therefore, no violations of air quality standards will occur. The project will not occur at a scale or scope with potential to contribute substantially to existing or projected air quality violation. The project will not occur at a scale or scope which will result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment.

The Edison Community Plan and the 2025 Fresno General Plan designate the subject site as heavy industrial and allows the proposed industrial use on the subject site. Given that the existing land use allows this type and intensity of development, the project is not proposing development beyond that examined in MEIR No. 10130 for the 2025 Fresno General Plan or the Mitigated Negative Declaration prepared for Plan Amendment A-09-02 to amend the Air Quality Element of the 2025 Fresno General Plan.

The project is not proposing a use which will create objectionable odors. The applicant will have programs in place to protect employees as well as the general public from exposure to the chemical products they distribute. The applicant provided the City of Fresno with a complete list of chemicals to be housed at the facility. Chemicals include corrosives, oxidizers, combustibles, flammables, poisons, toxics, as well as other classifications of products, including non-hazardous materials, which classifications have been attached for reference. The company primarily receives stores and ships chemicals without diluting them or changing their packaging. The products can be in either a solid or liquid state. No product will be stored in a gaseous state, thus, minimizing the possibility of objectionable odors and or exposure to the public. The company also supplies dry food grade chemicals, such as citric acid, which are diluted in water and repackaged to meet customer orders. This process will be done in an area designed to contain any potential spills until the spill can be appropriately neutralized. Engineering controls such as scrubbers to reduce hazardous vapors from affecting the employees and the surrounding areas will be implemented. In addition the use of personal protective equipment will help ensure a healthful environment in and around operations. To reiterate, pursuant to the operational statement submitted by the applicant, all chemicals will be stored in either liquid or solid state and no product will be stored in a gaseous state, therefore, the transfer of chemicals from one container to another and other operations related to this facility will not create objectionable odors affecting a substantial number of people.

Furthermore, the project shall obtain or prepare the following permits, registrations, and plans:

- San Joaquin Valley Air Quality Management District Air Permit
- Consolidated Unified Program Agency Permit
- California Highway Patrol Hazardous Materials Permit
- California Department of Justice Precursor Chemical Permit
- Pipeline and Hazardous Materials Safety Administration Hazardous Materials Shipper/Carrier Permit
- Federal Highway Administration Operating Authority Permit
- Environmental Protection Agency Federal Insecticide, Fungicide and Rodenticide Act Registrations
- Occupational Health and Safety Administration Air Pressure Vessel Permit
- California Department of Agriculture Feed and Fertilizer Permit
- Storm Water Permit
- A Storm Water Pollution Prevention Plan
- Monitoring Program Plan

The proposed project is not expected to generate substantial pollutant concentrations since this project will not generate significant vehicle traffic. The company will operate Monday through Friday; whereas, approximately thirty-three (33) employees will be at the project site at any given time. It is anticipated, aside from employees coming to and from the facility, less than two (2) visitors per week can be expected because the project does not include the processing or manufacture of materials of any kind. Therefore the project will not create pollutants that would impact sensitive receptors. The closest sensitive receptors to the proposed site are approximately 915 feet to the south of the subject site (single family home on the corner of North Hughes and West Nielsen Avenues). The California Air Resources Board Handout was referenced to determine a "minimum separation between new sensitive land uses and existing sources"; however, a specific use associated with the development of a chemical warehouse project could not be found or used as reference.

Residential land uses are considered "sensitive receptor" type land uses and are located approximately 915 feet from the proposed project site. Given that a railroad track is immediately adjacent to the site, there is a potential for the exposure of sensitive receptors to substantial pollutant concentrations in the event of a spill or accident. In the event of an emergency, an Emergency Coordinator (EC) will be designated to the proposed site to manage the response to hazardous materials/waste incidents resulting from fire, explosion, accidental release, natural disaster, or terrorist activities. This includes an Emergency Preparedness Contingency Plan (EPCP) developed in accordance with Title 40 of the Code of Federal Regulations (CFR) Part 262, Title 29 CFR Section 1910.120 and 1910.38, and California Environmental Protection Agency (CEPA) s.36 (1-3). An EPCP shall be developed for the project site to assist the EC or his/her designee(s) in determining appropriate response procedures.

The project has been required (as a mitigation measure) to participate in a Local Emergency Planning Committee where local response agencies (fire department, public health department, hospitals, etc.) and the community (District 3 leaders and residents) are made aware of activities and controls that are in place to prevent and control any accidental release of a hazardous material. One example highlighted by the applicant includes "mock-drills" in conjunction with local fire departments to practice the project's counter measures.

Pursuant to the Air Quality and Land Use Handbook prepared by the California Environmental Protection Agency California Air Resources Board dated April 2005, a railroad track is not considered a use that has a

significant negative air quality impact. High traffic freeways and roads and rail yards are uses called out by this study that may have significant negative air quality impacts.

Onsite containment would be as follows:

Within the Building – The areas within the building where hazardous chemicals will be stored shall have a system of curbs, drains, and containment areas that will keep any spills on site and contained until they are appropriately tested, neutralized, and cleaned up.

Engineering controls such as scrubbers will be installed to reduce hazardous vapors from affecting the employees and the surrounding areas.

Rail Car/Truck Unloading – Liquid chemicals from trucks and railcars shall be offloaded into approved external bulk storage tanks. Those liquid chemicals arriving in trucks shall be offloaded in the tank storage load out area which is designed to contain any spills until they can be appropriately neutralized.

Those liquid chemicals arriving by railcar shall be top offloaded into the bulk storage tanks, a process which is designed to help eliminate any catastrophic spills. As a further precautionary measure, the company shall place large plastic bins under the railcar connections to collect any accidental spillage. The external tanks will shall be used for the storage of the following bulk liquids:

- Sodium hydroxide 50% in a 25,000 gallon steel tank
- Sodium hydroxide 50% (low iron) in a 6,200 gallon poly tank
- Potassium hydroxide 50% in a 25,000 gallon steel tank
- Potassium hydroxide 50% (low iron) in a 6,200 gallon poly tank
- Hydrochloric Acid 36.5% in a 25,000 gallon FRP tank
- Sodium hypochlorite 12.5% in an 8,300 gallon poly tank and a 6,200 gallon poly tank
- Citric Acid 50% in two 5,500 gallon poly tanks

Tanks and Tanker Load out Area – This area shall be contained within itself for spillage and rainfall and adhere to the following: Concrete containment cells shall be engineered to handle the weight and volume of materials present in the storage tanks. The proposed system is designed to handle 110 percent of the capacity of the largest tank anticipated to be installed, which conforms to the requirements of the California Building Code and the California Fire Code.

Tanks and tanker load out area and containment area shall be visually inspected on a daily basis.

- Yard – The entire site has been designed to contain up to 3 inches of rainfall, stored in a depressed area of the site and the truck loading dock. The rainwater is prevented from leaving the site through a valve system. The rainwater, both on the site and in the tank containment area will be tested to assure that no contaminants are present. If there are contaminants, the water will be appropriately treated and retested to assure that they have been neutralized and that the water is safe. Once the water is determined to be safe, the valve is opened and the water will be pumped out to the storm water system.

The project applicant has proposed an “occurrence database” to source all loss producing events such as

personal injury, spill, and fire or vehicle accident. Near misses are also to be recorded and investigated in the same system. These events shall be resolved as appropriate through an established "root cause analysis and corrective action (RCACA) process. Historical data shall be available upon request. To supplement these efforts, the applicant will incorporate a training program to include safety and environmental video training modules, instructed classroom training as well as tailgate safety meetings and on-the-job instruction. This shall be monitored through Brenntag's "Pure Safety training software." Modules are to include general awareness, hazard classification, shipping papers, marking and labeling, placarding, emergency response, and packaging selection in UN approved containers.

Brenntag has a national contract with CURA Emergency Services. CURA has contracts with specialized local contractors throughout the nation. They are available to assist 24 hours per day, 365 days per year to clean up spills. Documentation and agreements shall be submitted to the City for their records.

The project would equal or exceed 25,000 square feet of industrial space. Therefore, this project would need to comply with Rule 9510 from the San Joaquin Valley Air Pollution Control District (SJVAPCD). This Rule (also called Indirect Source Review or ISR) provides for incorporation of a wide range of mitigation measures into projects, and levies fees for pollutants generated by development projects, transportation and development projects. The fees are used to provide for regional air quality improvements and mitigations. Specifically, Rule 9510 requires that operational (traffic-associated) NOX and PM10 emissions be reduced by at least 33.3% and 45%, respectively, and construction equipment NOX and PM10 emissions of projects be reduced by at least 20% and 45%, respectively. After further review and consultation with the Air District, it was determined that the project, as proposed, is "Exempt from ISR because the project is a permitted facility." However, the project shall adhere to the District's adopted document titled *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA*.

The project has been required (as a mitigation measure) to comply with all of the requirements stipulated within the attached Chemical Storage Guidelines (Chapter 6: Prevention Program (Program 2) prepared by the National Association of Chemical Distributors (NACD) dated January 27, 1999, or its most current form. In addition, the project shall comply with all of the requirements stipulated within the Guidelines for Safe Warehousing of Chemicals prepared by the Center for Chemical Process Safety of the American Institute of Chemical Engineers National Association of Chemical Distributors (NACD) dated 1998, or its most current form.

The Master Environmental Impact Report (MEIR) prepared for the 2025 Fresno General Plan requires that the most current version of URBEMIS (now known as CalEEMod) computer model be used to analyze development projects and estimate future air pollutant emissions that can be expected to be generated from operational omissions (vehicular traffic associated with the project), area-wide emissions (sources such as ongoing maintenance activities and use of appliances), and construction activities. According to the analysis conducted by First Carbon Solutions, the project would not exceed the SJVAPCD thresholds of significance during construction.

This analysis is to also determine if the Brenntag project would result in significant air quality impacts from the following criteria pollutants and toxic air contaminants: ozone precursors (Reactive Organic Gases (ROG) and NOX; CO, SOX, both regulated categories of particulate matter, and the greenhouse gas carbon dioxide (CO2). The model incorporates geographically-customized data on local vehicles, weather, and SJVAPCD Rules.

The land use data provided in CalEEMod was for a project containing approximately 58,699 square feet of warehouse space, inclusive of covered canopies and a boiler room on 11.22 acres. The trip rates per day are as follows: 2-7 HD Truck deliveries to site (assumed 7 as worst case); 12-20 HD Truck shipments from site (assumed 20 as worst case); and 3 rail deliveries per week. The analysis also incorporates mitigation measures required by the City and feasibility incorporated at this stage of project analysis. These mitigations include watering of construction sites and unpaved construction roads three times daily and reducing speed on construction roadways.

Project Construction Emissions

[all data given in tons/year]	ROG	NOx	CO	SO_2	PM10	PM2.5	CO2
Totals	**.85**	**4.18**	**2.82**	**3.76**	**.49**	**.34**	**347.5**
Level of Significance	10	10	N/A	N/A	15	15	N/A

The analysis determined that the proposed project will not exceed the threshold of significance limits for regulated air pollutants. During the construction phase of this project grading and trenching on the site may generate particulate matter pollution through fugitive dust emissions. SJVAPCD Regulation VIII addresses not only construction and demolition dust control measures, but also regulates ongoing maintenance of open ground areas that may create entrained dust from high winds. The applicant is required to provide landscaping on the project site which will contain trees to assist in the absorbsion of air pollutants, reduce ozone levels, and curtail storm water runoff.

Project Annual Operational Emissions

[all data given in tons/year]	ROG	NOx	CO	SO_2	PM10	PM2.5	CO2
Area	.24	0.00	5.10	0.00	0.00	0.00	9.60
Mobile	**.07**	**.27**	**.88**	**1.46**	**.09**	**.02**	**121.30**
Totals	**.33**	**.33**	**.93**	**1.80**	**.09**	**.03**	**371.83**
Level of Significance	10	10	N/A	N/A	15	15	N/A

First Carbon Solutions used the SJVAPCD HRA Truck Screening Model to estimate health risk associated with the operation of diesel powered vehicles at the project site. The SJVAPCD toxic air contaminant (TAC) threshold of significance for project operations is an increase in cancer risk of 10 in a million. The result of the analysis show an increase in cancer risk at the nearest sensitive receptor of 1.88 in a million. Therefore, the project's TAC impacts are less than significant.In summary, subject to compliance with existing policies, rules, and regulations, the proposed project will not significantly impact local air quality. The proposed project will not create additional air quality impacts beyond those already assessed the MEIR prepared for the 2025 Fresno General Plan and Plan Amendment No. A-09-002 to amend the Air Quality Element of the 2025 Fresno General Plan.

The proposed project shall implement and incorporate, as appropriate, the air quality related mitigation measures as identified in the attached Project Specific Monitoring Checklist dated May 29, 2014, including but not limited to, compliance with all applicable regulations.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				x
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				x
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				x
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				x
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				x
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				x

The project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans,

policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, because said species are not identified to be located within the project area and because the subject site was previously occupied by heavy industrial uses. There is no riparian habitat or any other sensitive natural community identified in the vicinity of the proposed project by the California Department of Fish and Game or the US Fish and Wildlife Service. No federally protected wetlands are located on the subject site; therefore, there would be no impacts to species, riparian habitat or other sensitive communities and wetlands. The project site is not located in an area containing native residents or migratory fish or wildlife species. The project site has no trees or other vegetation that could be considered a biological resource and thus the project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The project area is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?				X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
d) Disturb any human remains, including those interred outside of formal cemeteries?		X		

The project is not proposing a change to a historical or archaeological resource. There are no buildings that will be demolished in the construction of the development. There are no known paleontological resources or human remains that exist within the project area; therefore there will be no change or disturbing of said resources/remains. However, previously unknown archaeological resources or human resources could be disturbed during project construction. However, measures contained within the attached Master Environmental Impact Report No. 10130- 2025 Fresno General Plan Mitigation Monitoring Checklist dated May 29, 2014 will mitigate this potential impact to less than significant.

The proposed project will implement and incorporate, as appropriate, the cultural resource related mitigation measures as identified in the attached Master Environmental Impact Report No. 10130- 2025 Fresno General Plan Mitigation Monitoring Checklist dated May 29, 2014, and thus the impacts to cultural resources will be less than significant.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				x
ii) Strong seismic ground shaking?				x
iii) Seismic-related ground failure, including liquefaction?				x
iv) Landslides?				x
b) Result in substantial soil erosion or the loss of topsoil?			x	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				x
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				x
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				x

Based on a review of aerial photographs, it appears that the site has not been under cultivation since at least 1992. There are no known geologic hazards or unstable soil conditions known to exist on the project site. Fresno has no known active earthquake faults and is not in any Alquist-Priolo Special Studies Zone. Development of the property requires compliance with grading and drainage standards of the City of Fresno and Fresno Metropolitan Flood Control District Standards. The project does not involve the use of

a septic tank or an alternative waste water disposal system; therefore there is no impact to the soil. No adverse environmental effects related to topography, soils or geology are expected as a result of this project.

The proposed project is required to comply with standard requirements and procedures mandated by the County of Fresno Department of Public Health, which include requirements and procedures for the abandonment/removal of water wells, septic systems or underground storage tanks that exist or have been abandoned within the project area.

Brenntag conducts a site assessment "before any new facility is purchased or leased." This indicated that there are no existing environmental hazards affecting the health of employees or the public. This was determined by a 50-year chain of title review, review of soil and geologic information and environmental inquiries to local regulatory agencies, including the following:

Federal:

- Occupational Safety & Health Administration
- United States Department of Transportation
- Federal Motor Carrier Safety Administration
- Pipeline Hazardous Materials Safety Administration
- Federal Railroad Administration
- Environmental Protection Agency
- Federal Insecticide, Fungicide, and Rodenticide Act
- Food and Drug Administration
- Department of Justice
- Department of Homeland Security

State:

- California Occupational Safety & Health Administration
- California Environmental Protection Agency
- Consolidated Unified Program Agency
- California Department of Justice
- California Highway Patrol

No adverse environmental effects related to topography, soils or geology are expected as a result of this project. Implementation of the mitigation measures listed in MEIR No. 10130 and the attached MEIR Mitigation Monitoring Checklist dated May 29, 2014 will reduce the topographic, soils and geologic impacts to less than significant.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS -- Would the project:				

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

The proposed project has been determined to have a less than significant impact on greenhouse gases based on the guidance established by the San Joaquin Valley Air Pollution Control District (District) in the adopted document titled *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA.* According to this document, projects can be determined to have a less than significant impact if they do any other the following: 1) Use a combination of District approved GHG Emission Reduction Measures to meet BPS; 2) Comply with an approved GHG plan or mitigation program; or 3) Reduce GHG emissions by at least 29%. **The proposed project complies with an approved GHG Mitigation program (established through Plan Amendment Application No. A-09-02).**

Plan Amendment Application No. A-09-02, the Air Quality Amendment to the 2025 Fresno General Plan, adopted initial steps to address Fresno's part in avoiding global climate change, through adoption of new Resource Element / Air Quality General Plan Objectives and Policies. The information in previously-cited CAPCOA and California Attorney General publications has been used as information resources for GHG mitigation. A new objective has been added to the Air Quality section of the Resource Conservation Element specifically calling for reduction in GHG emissions, with supporting policies and implementation measures. Utilizing a qualitative analysis approach, projects consistent with, and appropriately implementing, air pollution and GHG reduction policies, and which mitigate any potentially significant project-specific GHG impacts, will be deemed to conform to GHG reduction requirements and to contribute to the City's overall GHG reduction goals. Periodic broad scale GHG modeling will be used to validate the efficacy of these measures and guide implementation and further rulemaking. The proposed project will be required to implement all relevant general plan policies related to GHGs. These policies will help to reduce this project's potential GHG impact. One new policy adopted in the City's Air Quality Plan Amendment is described below:

Policy G-1B-b Increase efforts to incorporate GHG emission reductions in land use decisions, facility design, and operational measures subject to City regulation through implementation measures such as the following:

(4) The City shall utilize guidance from the Institute for Local Government, California Attorney General's Office, California Air Pollution Control Officers Association, and other sources of technical guidance in determining appropriate and feasible mitigation measures which may be incorporated into land use plans, development projects and City operations to achieve GHG emission reductions.

The proposed project complies with this policy because it will comply with several of the measures detailed in the California Attorney General's Office guidance document titled, *The California Environmental Quality Act Mitigation of Global Warming Impacts at the Local Agency Level"* (updated January 07, 2008). This document offers policy guidance on mitigating GHG emissions. One mitigation measure states that

projects should “create travel routes that ensure that destinations may be reached conveniently by public transportation, bicycling or walking”. The proposed project will be required to install curb, gutter, and sidewalks to Public Works Standard P-5; driveway approaches to Public Works Standard(s) P-2 and P-6; and construct permanent paving (measured from face of curb to the section line) per Public Works Standard P-50 that will provide ample pedestrian access to the site. Painted bike lanes are planned for most collectors and arterials. A lot of these lanes are already painted; however, the 2025 Fresno General Plan does not propose bicycle/pedestrian designated lanes adjacent to the project site. The closest bicycle/pedestrian trail is located south of the project site off North Hughes Avenue and then heading east on West Nielson Avenue.

The proposed project will not occur at a scale or scope with potential to contribute substantially or cumulatively to the generation of greenhouse gas emissions, either directly or indirectly. Under the MEIR and General Plan mitigation measures and policies for reducing all forms of air pollution, levels of greenhouse gases will be reduced along with other regulated air pollutants.

The proposed project will not affect greenhouse gas emissions beyond what was analyzed in the Master Environmental Impact Report No. 10130/SCH No. 2001071097 for the 2025 Fresno General Plan or by Plan Amendment Application No. A-09-02. In addition, the proposed project will implement and incorporate, as appropriate, the greenhouse gas related mitigation measures as identified in the attached Master Environmental Impact Report No. 10130- 2025 Fresno General Plan Mitigation Monitoring Checklist dated May 29, 2014, and thus the impacts will be less than significant.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIAL -- Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			x	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		x		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			x	

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				x
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				x
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				x
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				x
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				x

The project is not expected to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. However, given the proximity to the railroad track and its intended use, there is a possibility that a spill or accident could occur, which creates a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment if precautions are not taken into account. In the event of an emergency, an Emergency Coordinator (EC) shall be designated to the proposed site to manage the response to hazardous materials/waste incidents resulting from fire, explosion, accidental release, natural disaster, or terrorist activities. This includes an Emergency Preparedness Contingency Plan (EPCP) developed in accordance with Title 40 of the Code of Federal Regulations (CFR) Part 262, Title 29 CFR Section 1910.120 and 1910.38, and California Environmental Protection Agency (CEPA) s.36 (1-3). An EPCP shall be developed for the project site to assist the EC or his/her designee(s) in determining appropriate response procedures.

The project has been required (as a mitigation measure) to participate in a Local Emergency Planning Committee where local response agencies (fire department, public health department, hospitals, etc.) and the community (District 3 leaders and residents) are made aware of activities and controls that are in place to prevent and control any accidental release of a hazardous material. One example highlighted by the applicant includes “mock-drills” in conjunction with local fire departments to practice the project’s counter

measures.

The project has been mitigated to comply with all of the requirements stipulated within the Chemical Storage Guidelines (Chapter 6: Prevention Program (Program 2) prepared by the National Association of Chemical Distributors (NACD) dated January 27, 1999, or its most current form. In addition, the project has been required (as a mitigation measure) to comply with all of the requirements stipulated within the Guidelines for Safe Warehousing of Chemicals prepared by the Center for Chemical Process Safety of the American Institute of Chemical Engineers National Association of Chemical Distributors (NACD) dated 1998, or its most current form.

Storage tanks shall adhere to the following standards:

- Steel and stainless steel tanks shall be built to American Petroleum Institute (API) or Underwriters Laboratories (UL) standards.
- Fiberglass (FRP) tanks shall be built to the American Society for Testing and Materials (ASTM) 3299/4097 standards.
- Poly tanks shall be built to the ASTM D1998 standard.
- Storage tank system shall be designed to automatically alert the operators when 90% of tank capacity has been reached and to automatically prevent tank capacity from exceeding 95% capacity, as proposed.
- Tanks shall have individual pumps for each material stored at the facility.
- Hoses shall be tested at time of purchase and every six months afterwards. Hoses shall be visually inspected with every use for signs of non-compliance.

Onsite containment will be as follows:

Within the Building – The areas within the building where hazardous chemicals will be stored shall have a system of curbs, drains, and containment areas that will keep any spills on site and contained until they are appropriately tested, neutralized, and cleaned up.

Engineering controls such as scrubbers will be installed to reduce hazardous vapors from affecting the employees and the surrounding areas.

Rail Car/Truck Unloading – Liquid chemicals from trucks and railcars shall be offloaded into approved external bulk storage tanks. Those liquid chemicals arriving in trucks shall be offloaded in the tank storage load out area which is designed to contain any spills until they can be appropriately neutralized.

Those liquid chemicals arriving by railcar shall be top offloaded into the bulk storage tanks, a process which is designed to help eliminate any catastrophic spills. As a further precautionary measure, the company shall place large plastic bins under the railcar connections to collect any accidental spillage. The external tanks will shall be used for the storage of the following bulk liquids:

- Sodium hydroxide 50% in a 25,000 gallon steel tank
- Sodium hydroxide 50% (low iron) in a 6,200 gallon poly tank
- Potassium hydroxide 50% in a 25,000 gallon steel tank
- Potassium hydroxide 50% (low iron) in a 6,200 gallon poly tank

- Hydrochloric Acid 36.5% in a 25,000 gallon FRP tank
- Sodium hypochlorite 12.5% in an 8,300 gallon poly tank and a 6,200 gallon poly tank
- Citric Acid 50% in two 5,500 gallon poly tanks.

Tanks and Tanker Load out Area – This area shall be contained within itself for spillage and rainfall and adhere to the following: Concrete containment cells shall be engineered to handle the weight and volume of materials present in the storage tanks. The proposed system is designed to handle 110 percent of the capacity of the largest tank anticipated to be installed, which conforms to the requirements of the California Building Code and the California Fire Code.

- Tanks and tanker load out area and containment area shall be visually inspected on a daily basis. Yard – The entire site has been designed to contain up to 3 inches of rainfall, stored in a depressed area of the site and the truck loading dock. The rainwater is prevented from leaving the site through a valve system. The rainwater, both on the site and in the tank containment area will be tested to assure that no contaminants are present. If there are contaminants, the water will be appropriately treated and retested to assure that they have been neutralized and that the water is safe. Once the water is determined to be safe, the valve is opened and the water will be pumped out to the storm water system.

In addition to containment measures proposed by the project applicant, an "occurrence database" to source all loss producing events such as personal injury, spill, and fire or vehicle accident has been proposed. Near misses are also to be recorded and investigated in the same system. These events shall be resolved as appropriate through an established "root cause analysis and corrective action (RCACA) process." Historical data shall be available upon request. In the event of an unavoidable emergency situation, Brenntag has a national contract with CURA Emergency Services. CURA has contracts with specialized local contractors throughout the nation. They are available to assist 24 hours per day, 365 days per year to clean up spills.

To supplement this effort, the project applicant shall incorporate a training program which includes safety and environmental video training modules, instructed classroom training as well as tailgate safety meetings and on-the-job instruction. This shall be monitored through Brenntag's "Pure Safety training software." Modules are to include general awareness, hazard classification, shipping papers, marking and labeling, placarding, emergency response, and packaging selection in UN approved containers. The applicant shall comply with an established Illness and Injury Prevention Program to prevent workplace accidents, illness, and injuries. Each branch's program is tailored to be site specific and shall include the following provisions:

- Program administrator responsible for implementing and maintaining the program;
- Scheduled and unscheduled safety inspections;
- Hazard assessment process to analyze any new substance, procedure or equipment introduced into the workplace and develop appropriate controls;
- Safety Suggestion Box;
- Comprehensive incident investigation to include all accidents and near misses;
- Branch specific safety rules;
- Appropriate training;
- Safety meetings; and

A process to ensure compliance with all elements of the program. Additional safety policies, procedures and work instructions, include, but are not limited to:

- Hazard Communications/Workplace Health and Safety Information System
- Use of Personal Protective Equipment
- Respiratory Protection
- Access Requirements for Contractors at Company Sites
- Commercial Carrier Qualifications
- Forklift Operations and Safety Practices
- Permit-Required Confined Spaces
- Lock Out / Tag Out Procedures
- Emergency Response and Communications
- Facility Inspection and Maintenance
- Vehicle Inspection and Maintenance
- Safe Loading and Unloading (Bulk and Non-bulk)
- Safe Product Storage
- Safe Transportation and Delivery
- Driver Qualification Process
- Site and Transportation Security
- Specific work instructions for critical tasks

The County of Fresno Department of Public Health has recommended conditions of approval be added to the project, which will also be incorporated prior to operation. This includes the applicant completing the online hazardous Materials Business Plan submittal. Additionally, all hazardous waste shall be handled in accordance with requirements set forth in the California Health and Safety Code, Division 20, Chapter 6.5. This chapter further discusses proper labelling, storage and handling of hazardous wastes.

The project has been required (as a mitigation measure) to obtain or prepare the following permits, registrations, and plans:

- San Joaquin Valley Air Quality Management District Air Permit
- Consolidated Unified Program Agency Permit
- California Highway Patrol Hazardous Materials Permit
- California Department of Justice Precursor Chemical Permit
- Pipeline and Hazardous Materials Safety Administration Hazardous Materials Shipper/Carrier Permit
- Federal Highway Administration Operating Authority Permit
- Environmental Protection Agency Federal Insecticide, Fungicide and Rodenticide Act Registrations
- Occupational Health and Safety Administration Air Pressure Vessel Permit
- California Department of Agriculture Feed and Fertilizer Permit
- Storm Water Permit
- A Storm Water Pollution Prevention Plan
- Monitoring Program Plan

Brenntag is regulated through a variety of Federal, State, and non-governmental programs:

Federal:

- Occupational Safety & Health Administration
- United States Department of Transportation
- Federal Motor Carrier Safety Administration
- Pipeline Hazardous Materials Safety Administration
- Federal Railroad Administration
- Environmental Protection Agency
- Federal Insecticide, Fungicide, and Rodenticide Act
- Food and Drug Administration
- Department of Justice
- Department of Homeland Security

State:

- California Occupational Safety & Health Administration
- California Environmental Protection Agency
- Consolidated Unified Program Agency
- California Department of Justice
- California Highway Patrol

Non-Governmental Programs:

- American Institute of Baking (food safety)
- International Standards Organization ISO 9001:2008 (quality management systems)
- National Association of Chemical Distributors (chemical distribution safety and compliance)
- National Sanitation Foundation (drinking water safety)

With mitigation proposed the proposed project will not create impacts beyond those already assessed in the MEIR prepared for the 2025 Fresno General Plan and Plan Amendment No. A-09-002 to amend the Air Quality Element of the 2025 Fresno General Plan.

The project site is not expected to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The closest school is approximately ½ mile or 2,090 feet from the project site.

Although the project area is located within an airport land use plan (Fresno-Chandler Downtown Airport Master and Environs) and traffic pattern zone of FCEA, the project will not expose people residing or working in the project area to excessive noise levels from the airport because the proposed project is simply in the airport review area and is not within an identified noise contour identified by the airport land use plan.

The project has been reviewed by the Department of Airports and it has been determined that the project will not result in a safety hazard for people residing or working in the project area. The project is also not

within the vicinity of a private airstrip, therefore, it would not result in a safety hazard for people residing or working in the project area. The project will not interfere with an adopted emergency plan. The project area is not located near a wildland area or an SRA; therefore the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires.

The proposed project shall implement and incorporate, as appropriate, the hazards and hazardous materials related mitigation measures as identified in the attached Project Specific Monitoring Checklist dated May 29, 2014, including but not limited to, compliance with all applicable regulations.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY -- Would the project:				
a) Violate any water quality standards or waste discharge requirements?				x
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				x
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				x
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			x	
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			x	

f) Otherwise substantially degrade water quality?				x
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				x
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				x
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				x
j) Inundation by seiche, tsunami, or mudflow?				x

The City's Department of Public Utilities has determined that water facilities are available to provide service to the subject site as long as any on-site wells are sealed and abandoned and installation of water service and meter box is in place. The City of Fresno has a capital improvement project to construct a 16-inch transmission water main in North Hughes Avenue, fronting the proposed development. The project is scheduled to be constructed in 2015. As such, the applicant will not be required to construct a 16-inch water main in North Hughes Avenue from the existing 14-inch main located in West Nielson Avenue north across the project frontage; however, the applicant will be required to install hydrants, water service and meter box, private on-site water facilities, and seal and abandon any existing on-site well(s) in compliance with the State of California Well Standards, Bulletin 74-90 or current revisions issued by California Department of Water Resources and City of Fresno standards.

The Department of Public Utilities has, as a standard condition of approval, required the developer to incorporate water use efficiency measures into the project and has required that the developer provide a detailed water usage analysis identifying water fixture, landscape, and laundry efficiencies to document water conservation design characteristics.

The Fresno Metropolitan Flood Control District (District) bears responsibility for storm water management within the Fresno-Clovis metropolitan area, including the area of the project site. Within the metropolitan area, storm runoff produced by land development is to be controlled through a system of pipelines and storm drainage retention basins. The proposed project lies within the District's Drainage Area "ZZ".

The community has developed and adopted a Storm Drainage and Flood Control Master Plan. Each property is required to contribute its pro-rata share to the cost of the public drainage system. It is this form of participation in the cost and/or construction of the drainage system that will mitigate the impact of development. Effected subject properties shall pay drainage fees pursuant to the Drainage Fee Ordinance prior to issuance of a building permit at the rates in effect at the time of such approval.

The District requires that the storm drainage patterns for the proposed project conform to the District's Master Plan. The District will need to review and approve all improvement plans for any proposed grading, construction of curb and gutter or storm drainage facilities for conformance to the Master Plan within the project area. The District has indicated that permanent drainage service is available provided the developer can verify to the satisfaction of the City of Fresno that runoff can be safely conveyed to the Master Plan inlets.

The proposed development does not appear to be located within a flood prone area. In an effort to improve storm runoff quality, outdoor storage areas shall be constructed and maintained such that material that may generate contaminants be prevented from contact with rainfall and runoff and thereby prevent the conveyance of contaminants in runoff into the storm drain system. Runoff from areas where industrial activities, product, or merchandise come into contact with and may contaminate storm water must be directed though landscaped areas or otherwise treated before discharging it off-site or into a storm drain. Cleaning of such areas by sweeping instead of washing is to be required unless such wash water can be directed to the sanitary sewer system. The entire site has been designed to contain up to three (3) inches of rainfall, stored in a depressed area of the site and the truck loading dock. The rainwater is prevented from leaving the site through a valve system. The rainwater both on the site and in the tank containment area will be tested to assure that no contaminants are present. If there are contaminants, the water will be appropriately treated and retested to assure that they have been neutralized and that the water is safe. Once the Flood Control District determines that the water is safe, the valve is opened and the water pumped out to the storm water system.

Construction activity, including grading, clearing, grubbing, filling, excavation, development or redevelopment of land that results in a disturbance of one (1) acre or more of the total land area, or less if part of a larger plan of development or sale, must secure a storm water discharge permit in compliance with the U.S. Environmental Protection Agency's National Pollutant Discharge Elimination System regulations (CFR Parts 122-124, Nov. 1990). The permit must be secured by filing a Notice of Intent for the State General Permit for Construction Activity with the State Water Resources Control Board. The notice must be filed prior to the start of construction. Copies of the State General Permit and Notice of Intent are available at the District.

The project will not place housing or other structures within a 100-year flood hazard area. The project’s final improvement plans will be reviewed by the Fresno Metropolitan Flood Control District for conformance with the Storm Drainage and Flood Control Master Pan, and will, therefore, not expose people to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. The project area is considerably built-out, and urban, and therefore not prone to seiche, tsunami or mudflow.

The mitigation measures of Master EIR No. 10130 are incorporated herein by reference and are required to be implemented by the attached mitigation monitoring checklist dated May 29, 2014.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING - Would the project:				

a) Physically divide an established community?				x
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				x
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				x

The project will be constructed on an approximately 11.63 acre site. The proposed M-3 zone district is consistent with the planned land use of heavy industrial pursuant to Section 12-403-B-1 of the Fresno Municipal Code.

As discussed above, the proposed project is consistent with the 2025 Fresno General Plan and Edison Community Plan and Fresno Municipal Code Section 12-228, the "M-3" *(Heavy Industrial)* zone district.

The proposed project will not physically divide an established community given that the proposed industrial development will be located on property that has been used for industrial purposes for decades (approximately 30 years).

The proposed project will not conflict with any applicable land use plan, policy, or regulation. The proposed use is specifically allowed in the proposed zone district and will be required to comply with all codes and regulations. The proposed project is in compliance with several goals and policies contained in both the 2025 Fresno General Plan (General Plan) and the Edison Community Plan. For example, Objective C-13 of the 2025 Fresno General Plan is to plan and support industrial development to promote job growth while enhancing Fresno's urban environment. A variety of subcontractors will be working at the project site. Many of their employees and suppliers are located in or in close proximity to District 3. For reference, see attached list of subcontractors, which includes number of employees, suppliers, estimated wages and related payroll, and product valuation as it relates to purchases taking place within District 3.

Supporting policy C-13-i is intended to provide sufficient opportunities for heavy industrial planned uses in areas that are accessible from major transportation corridors, and where land use compatibility issues, health and safety concerns and public facility and service needs can be addressed to ensure stability of economic investments and opportunities for growth. The proposed project will meet the intent of these objectives and policies because the proposed project will integrate well into the existing surrounding industrial uses.

Similarly, the goals of the Edison Community Plan are directed toward providing a framework for public and private actions which will stimulate the long-term balanced growth of the community. In order to achieve this overall purpose there are three primary objectives: (1) Stimulate growth in the Edison Community by improving the quality of the environment and the strategic provision of public facilities improvements; and (2) Stimulate an increase of income levels throughout the Edison Community through programs of

economic and employment development.

Therefore, it is staff's opinion that the proposed site plan review application is consistent with respective general and community plan objectives and policies and will not conflict with any applicable land use plan, policy or regulation of the City of Fresno. The proposed project is found; (1) To be consistent with the goals, objectives, and policies of the applicable 2025 Fresno General Plan and Edison Community Plan; (2) To be suitable for the type and density of development; (3) To be safe from potential cause or introduction of serious public health problems; and, (4) To not conflict with any public interests in the subject site or adjacent lands.

No habitat conservation plans or natural community conservation plans in the region pertain to the natural resources that exist on the subject site or in its immediate vicinity. Therefore, there would be no impacts.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

The subject property is not located in an area designated for mineral resource preservation or recovery and will, therefore, not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. The subject site is not delineated on a local general plan, specific plan or other land use plan as a locally-important mineral resource recovery site and will, therefore, not result in the loss of availability of a locally-important mineral resource.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE -- Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	`			x
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			x	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			x	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				x
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				x

The proposed project will not expose persons to excessive noise levels. Although the project will create additional activity in the area and will be located adjacent to a railroad track, the project will be required to comply with all noise policies from the 2025 Fresno General Plan and noise codes from the Fresno Municipal Code. Policy H-1-d of the 2025 Fresno General Plan states that "the city shall require an acoustical analysis in those cases where a project potentially threatens to expose existing or proposed noise-sensitive land uses to excessive noise levels. The presumption of potentially excessive noise levels shall be based on the location of new noise-sensitive uses to known noise sources or staff's professional judgment that a potential for adverse noise impacts exists". Because of the project's location abutting railroad tracks and being located within an established heavy industrial area, staff did not require the applicant to prepare an acoustical analysis.

There will be a temporary increase in noise levels during construction of the project; however, the applicant will be required to comply with all applicable codes and regulations during construction. Construction noise will be reduced through the implementation of a Fresno Municipal Code requirement that limits construction days and times. In addition, the construction of the proposed project is subject to standard rules and regulations that are incorporated into the project that will minimize potentially significant short-term localized noise impacts to noise sensitive receivers caused by the operation of construction equipment. As part of the project, construction specifications for the project will require that all construction equipment be maintained according to the manufacturers' specifications, and that noise generating construction equipment is equipped with mufflers. Therefore, there will be a less than significant impact for temporary noise levels.

Although the project area is located within an airport land use plan (Fresno-Chandler Downtown Airport Master and Environs) and traffic pattern zone of FCEA, the project will not expose people residing or

working in the project area to excessive noise levels from the airport because the proposed project is simply in the airport review area and is not within an identified noise contour identified by the airport land use plan.

Based on the above analysis, exposure to noise levels in excess of standards established in the general plan and noise ordinance is not expected and impacts related to noise will be less than significant.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING -- Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

The proposed project will not substantially induce population growth because the project is being proposed as an industrial use consistent with the 2025 Fresno General Plan and Edison Community Plan. The project will not displace existing housing; therefore it will not necessitate the construction of replacement housing. The project will not displace any people; therefore there is no need for replacement housing.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES --				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				

Fire protection?			X	
Police protection?				X
Drainage and flood control?				X
Parks?				X
Schools?				X
Other public services?				X

The subject site is located approximately 1/2 miles from Fire Station #19 and is within the City of Fresno police area. The fire department has required on-site fire hydrants with a flow of 1,500 GPM with a minimum eight (8) inch water main. Further, the existing private water system for this property has been out of service for several years and it would be highly impractical to place it back into service. The existing current public water main will need to be extended to the front of the property (approximately 1,000 feet). All required fire access lanes shall be provided and maintained with an approved 'all weather' surface capable of supporting 80,000 ib. vehicles (minimum four (4) inch of base rock over compacted or undisturbed native soil or per approved engineered plans). Year-round and with twenty-four (24) feet minimum width or other approved method that would prevent shoulder degradation. Therefore, police and fire protection services are available to serve the subject site. The Fresno Metropolitan Flood Control District (FMFCD) has indicated that the FMFCD system could accommodate the proposed site plan review application and permanent drainage service is available.

The demand for parks generated by the project will be within planned service levels of the City of Fresno Parks and Community Services Department and the applicant will pay any required impact fees at the time building permits are obtained.

Any new commercial/industrial development occurring as a result of the proposed project will have an impact on the School District's student housing capacity. The School District, through local funding, is in a position to mitigate its shortage of classrooms to accommodate planned population growth for the foreseeable future. However, the District recognizes that the legislature, as a matter of law, has deemed under Government Code Section 65996, that all school facilities impacts are mitigated as a consequence of SB 50 Level 1, 2 and 3 developer fee legislative provisions. The developer will pay appropriate impact fees at time of building permits. The Fresno Unified School District levies a commercial/industrial development fee of $0.51 per square foot. The proposed office space would be subject to the commercial rate of development fees. However, the proposed warehouse space would be exempt from fees if the space is used exclusively for storage and does not result in an increased number of employees. The new development on the property will be subject to the development fee prior to issuance of a building permit.

The Department of Public Utilities has reviewed the site plan review application and has determined that sewer and water facilities are available to provide service to the subject site subject to several conditions discussed earlier.

Therefore, the proposed project will not affect public services beyond what was analyzed in the Master Environmental Impact Report No. 10130/SCH No. 2001071097 for the 2025 Fresno General Plan.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION --				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

The proposed project will not result in the physical deterioration of existing parks or recreational facilities; and, will not require expansion of existing recreational facilities or affect recreational services beyond what was analyzed in the Master Environmental Impact Report No. 10130/SCH No. 2001071097 for the 2025 Fresno General Plan given that the project is proposing a development intensity that was analyzed by the 2025 Fresno General Plan.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI**.** TRANSPORTATION/TRAFFIC -- Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?			X	
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?			X	

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?				x
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				x
e) Result in inadequate emergency access?				x
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				x

The Public Works Department reviewed the proposed project and determined that a traffic study is not required because the proposed project would generate a count of 213 Average Daily Trips (A.D.T.), based upon code 150 and 710 (ITE) of the Institute of Transportation Engineers' Trip Generation manual. Thus, the proposed project is not expected to generate traffic which would significantly impact any nearby roads. Therefore, the project would have a less than significant impact and not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or in a substantial increase in vehicle miles traveled.

The proposed project will not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system because the project would not result in increasing the level of service beyond the level allowed by the 2025 Fresno General Plan. The proposed project will not conflict with a congestion management program. The project proposes industrial development and will, therefore, not result in a change in air traffic patterns. The proposed project will not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses.

The Public Works Department, Traffic Engineering Division, and the Department of Transportation - District 6 has reviewed the proposed project and potential traffic related impacts for the site plan review application and has determined that the streets adjacent to and near the subject site will be able to accommodate the quantity and kind of traffic which may be potentially generated subject to the requirements stipulated within the memoranda from the Traffic Engineering Division. Furthermore, it is anticipated that this development would impact State facilities along State Route (SR) 180 at Marks Avenue however this interchange is relatively new and has adequate capacity to accommodate any traffic. It is also anticipated that this development would impact State facilities along SR 99 at Belmont Avenue however there is currently no planned improvement at this location. Therefore, the project will mitigate any traffic-related impacts by paying into the City of Fresno's TSMI program as well as the Fresno RTMF.

The proposed project will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. The project has been reviewed by the Fresno Fire Department and it has been determined that the proposed project will not result in inadequate emergency access as discussed earlier in this document.

The area street plans are the product of careful planning that projects traffic capacity needs based on the densities and intensities of planned land uses anticipated at build-out of the planned area. These streets will provide adequate access to, and recognize the traffic generating characteristics of, individual properties and, at the same time, afford the community an adequate and efficient circulation system.

Therefore, no substantial increase in transportation or traffic is expected to result from the proposed project.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

The project site will be serviced by the Solid Waste Division and have water and sewer facilities available subject to several conditions.

The proposed project is not expected to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board and will not result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, therefore no significant environmental effects can result from the construction of said facilities. The project plans will be reviewed by the Fresno Metropolitan Control District, therefore the construction of any required storm water drainage facilities will not cause significant environmental effects. Sufficient water supplies are available to serve the project from existing resources and no new or expanded entitlements are needed. The project will generate a minimal amount of wastewater and solid waste and will, therefore, not have significant wastewater or landfill impacts. Any demolition material generated by construction activities will be disposed of properly; therefore the project will comply with federal, state and local statues related to solid waste.

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

The project is proposed at a size and scope which does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population

to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory; additionally, the project site is located within an area, which has been predominantly developed with urban uses. Additionally, there are no fish or wildlife species, plant or animal community, located within the project area. There is no evidence in the record to indicate that the increment of environmental impacts that would be potentiated by this project would be cumulatively significant. There is also no evidence in the record that the proposed project would have any adverse impacts directly, or indirectly, on human beings. Therefore, there are no mandatory findings of significance.

CAO033010

MEIR Review Summary

EXHIBIT C

MASTER ENVIRONMENTAL IMPACT REPORT (MEIR) REVIEW SUMMARY

Projected Population and Housing. The City of Fresno experienced a period of notable growth in the construction of single family residences over the first five-year period of the 2025 Fresno General Plan (2003 through 2007). However, this development has occurred within the parameters anticipated by the General Plan and the mitigation measures established by Master Environmental Impact Report (MEIR 10130/SCH 2001071097). The General Plan and its MEIR utilized a projected population growth rate for purposes of land use and resource planning. This projection anticipated an annual average population growth of approximately 1.9 percent over the 23-year planning period. Population estimates provided by the State of California Department of Finance (DOF) indicate a population growth of approximately 60, 000 people between 2002 and 2007 with a growth rate varying from 1.47 to 1.97 percent per year. These estimates are well within the growth projections of the General Plan and MEIR.

As of May 2013, the City has processed 136 plan amendment applications since the adoption of the 2025 Fresno General Plan. These applications have resulted in changes of planned land use that affected approximately 1,586 acres, representing approximately one percent of the land area within the 2025 Fresno General Plan boundary. The impacts of these amendments are minimal and not significant in relation to the balance of the density and intensity of the land uses impacted by the plan amendment applications.

Based upon this, many of the assumptions relied upon for the MEIR to address other impacts, such as traffic, air quality, need for public utilities, services and facilities and water supplies are still valid to the extent that these assumptions relied upon projected population growth during the General Plan planning period. For this reason and the others provided below, the Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known pursuant to CEQA Guideline Section 15179(b)(1) and the MEIR may still be relied upon.

Transportation and Circulation. Subsequent to the certification of the MEIR the City of Fresno has required the preparation of approximately 200 site specific traffic impact studies and had required the provision of street, intersection signalization and transportation improvements in accordance with the adopted mitigation measures of the MEIR. The City's Traffic Engineer reports that through review of these approximately 200 traffic impact studies, the City has not seen traffic counts substantially different than those predicted by the MEIR. Concurrently with these efforts, the City adopted a new program for traffic signal and major street impact fees to pay for planned improvements throughout Fresno (not just in new growth areas, as has been the case with the previous impact fee program). These fees will more comprehensively provide for meeting transportation infrastructure needs and will expedite reimbursement for developments~~,~~ which construct improvements that exceed the project's proportionate share of the corresponding traffic or transportation capacity needs.

In addition to the local street system, the City has entered into an agreement with the California Department of Transportation to collect impact fees for state highway facilities which may be impacted by new development projects. The City participates in the Fresno County

Transportation Authority, which recently was successful in obtaining voter re-authorization of a half-cent sales tax to be dedicated to a wide range of transportation facilities and programs (including mass transit). The City is also an active participant in ongoing regional transportation planning efforts, such as a freeway deficiency study, a corridor study for one or more additional San Joaquin River crossings, and the State's "Blueprint for the Valley" process. All these studies were commenced after the MEIR was certified, but none of them is yet completed. Therefore, it cannot be concluded that Fresno's environmental setting or the MEIR analysis of traffic and circulation have materially changed since November of 2002.

Therefore, Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known based upon traffic impacts pursuant to CEQA Guideline Section 15179(b)(1).

Air Quality and Global Climate Change Staff has worked closely with the regional San Joaquin Valley Air Pollution Control District (SJVAPCD) since the November 2002 certification of the 2025 Fresno General Plan Master Environmental Impact Report (MEIR). Potential air quality impacts have been analyzed for every environmental assessment initial study done for City development projects. Projects are required to comply with SJVAPCD rules and regulations via conditions of approval and mitigation measures formulated in the MEIR.

Overall, revisitation of these issues leads to the conclusion that, while there have been changes in air quality laws, planning requirements, and rules and regulations since certification of the MEIR, the actual environmental setting has not evidenced degradation of air quality. (Because air quality and global climate change are matters of some public controversy, additional documentation has been supplied on this issue; please refer to the appended full analysis with supporting data.)

In conjunction with SJVAPCD attainment plans and attendant rules and regulations that were adopted prior to the certification of the MEIR, policies in the 2025 Fresno General Plan and MEIR mitigation measures aimed at improving air quality appear to be working. Since 2002, data show that pollutant levels have been steadily decreasing for ozone/oxidants and for particulate matter (10 microns and 2 microns in size). Recent adoption of new air quality attainment plans by SJVAPCD, calling for broader and more stringent rules and regulations to achieve compliance with national and state standards, is expected to accelerate progress toward attainment of clean air act standards.

Analysis of global climate change analysis was not part of the MEIR in 2002, due to lack of scientific consensus on the matter and a lack of analytical tools. However, under the MEIR and General Plan mitigation measures and policies for reducing all forms of air pollution, levels of greenhouse gases have been reduced along with the other regulated air pollutants. At this point in time, detailed analysis and conclusions as to the significance of greenhouse gas emissions and strategies for mitigation are still not feasible, because the legislatively-mandated greenhouse gas inventory benchmarking and the environmental analysis policy formulation tasks of the California Environmental Protection Agency Air Resources Board and the Governor's Office of Planning and research are not completed. The information available does not support any conclusion that Site Plan Review Application No. S-13-047 or other City projects would have a significantly adverse impact on global climate change. Similarly, there is insufficient information to conclude that global climate change would have a significantly adverse impact upon the City of Fresno or specific development projects.

Staff is not aware of any particular circumstance or information that would make impacts to air quality a reasonably foreseeable impact or more severe impact from that identified in the MEIR. Therefore, Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known based upon air quality impacts pursuant to CEQA Guideline Section 15179(b)(1).

Water Supply, Quality and Hydrology. The City of Fresno has initiated, continued and completed numerous projects addressing general plan and MEIR provisions relating maintaining an adequate supply of safe drinking water to serve present and future projected needs. A water meter retrofit program to meter service to all consumers by the end of the year 2012 is underway, in compliance with State law that predated the MEIR and with new regulations affecting the U.S. Bureau of Reclamation Central Valley Project. (While the federal regulation has trumped a voter-approved City charter amendment that specifically prohibited using meters for residential development, the City's plans and policies have always contained measures calling for water conservation and for seeking ways to reduce average consumption of households. Metering is recognized as the best implementation measure for this, and does not constitute a change in the City's environmental setting or the analysis and mitigation in the 2025 Fresno General Plan MEIR.) After certification of the MEIR, the City commenced operation of its northeast area surface water treatment facility; initiated and began construction of additional groundwater wells with granular activated carbon filtration systems as necessary to remediate groundwater contamination that was discussed in the MEIR and its mitigation measures; provided for additional groundwater recharge areas; and expanded its network of water transmission main pipeline improvements allowing for improved distribution of water supply.

As called for in 2025 General Plan policies and MEIR mitigation measures, the City has implemented several programs for preventing water pollution: In conjunction with Fresno Metropolitan Flood Control District and the Regional Water Quality Control Board (RWQCB) City inspectors assist in enforcing the National Pollutant Discharge Elimination System Stormwater Pollution Prevention regulations, The Planning and Development Department also consults with RWQCB on specific development projects which may require on-site wastewater treatment, and provides project-specific conditions and even supplemental environmental analysis for such projects, with specific mitigation measures. The City's Department of Public Utilities has enhanced its industrial pretreatment permitting program for industrial wastewater generators who discharge to the Fresno-Clovis Wastewater Treatment and Reclamation Facility.

Staff is not aware of any particular circumstance or information that would make impacts to water supply, quality and hydrology a reasonably foreseeable impact or more severe impact from that identified in the MEIR. The Director of Public Utilities finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known based upon traffic impacts pursuant to CEQA Guideline Section 15179(b)(1).

Agricultural Resources. The implementation of applicable policies since adoption of the 2025 Fresno General Plan has encouraged the development of urban uses in a more systematic pattern that avoids discontinuity and the creation of vacant by-passed properties. These efforts, together with the requirement to record "right-to-farm" covenants, facilitate the continuation of existing agricultural uses within the city's planned urban growth boundary during the interim period preceding orderly development of the property as anticipated by the General Plan. Staff is not aware of any particular circumstance or information that would make impacts from loss of

agricultural resources a reasonably foreseeable impact or more severe impact from that identified in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to loss of agricultural resources pursuant to CEQA Guideline Section 15179(b)(1).

Demand for Utilities and Service Systems. The City of Fresno has continued to provide for utilities and service systems commensurate with the demands of increased population and employment within its service area, implementing policies of the 2025 Fresno General Plan and conforming to MEIR mitigation measures. Programmatic measures have been continued, expanded or initiated to increase the efficiencies of providing services in a manner that will reduce potential impacts upon the natural and human environment. These improvements have included bringing the City's first surface water treatment plant on-line to distribute treated surface water, thereby preventing a worsening of groundwater overdraft in northeast Fresno; converting a substantial portion of the City's service vehicle fleet to alternative fuels; and expanding recycling and conservation measures (including contracting with a major material sorting and recycling facility and a green waste processor to comply with AB 939 solid waste reduction mandates) to more judiciously use resources and minimize adverse impacts the environment. Adoption of City-wide police and fire facility development impact fees and a contract to consolidate fire service with an adjacent fire prevention district have been accomplished to assure the provision of adequate firefighting capacity to serve a broader geographic extend of urban development and more intensive and mixed-use development throughout the metropolitan area.

Because these changes were anticipated in, or provided for by, the 2025 Fresno General Plan and its MEIR mitigation measures, they do not constitute a significant or adverse alteration of Fresno's environmental setting. Staff is not aware of any particular circumstance or information that would make impacts from increased demand for utilities and service systems and public facilities a reasonably foreseeable impact or more severe impact from that identified in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to increased demand for utilities, service systems, and public facilities pursuant to CEQA Guideline Section 15179(b)(1).

Demand for Recreational Facilities. The City of Fresno has adopted and City-wide parks facility and Quimby Act fee which provides for the acquisition of new open space and recreation facilities as well as improvements to existing facilities and programs to provide a broader range of recreation opportunities. Staff is not aware of any particular circumstance or information that would make impacts from increased demand for recreational facilities a reasonably foreseeable impact or more severe impact from that identified in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to increased demand for utilities, service systems, and public facilities pursuant to CEQA Guideline Section 15179(b)(1).

Biological Resources. The City continues to evaluate all development proposals for potential impacts upon natural habitats and associated species dependent upon these habitats. The City supports continuing efforts to acquire the most prominent habitats where appropriate, such as portions of the San Joaquin River environs. When development or public works projects have been proposed in this area, they have been subject to site-specific evaluation through

supplemental environmental analyses, and appropriate mitigation measures and conditions applied as derived from consultation with the U.S. Fish and Wildlife Service and the California Department of Fish and Game. The City has imposed MEIR mitigation measures related to Biological Resources on projects that identified potential impacts to biological resources. Staff finds that this has adequately addressed any potential impact to biological resources. Staff is not aware of any particular circumstance or information that would make impacts from loss of biological resources a reasonably foreseeable impact or more severe impact from that identified in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to loss of biological resources pursuant to CEQA Guideline Section 15179(b)(1).

Potential Disturbance of Cultural Resources. The City of Fresno has implemented numerous efforts to identify historic and cultural resources, and provide thorough consideration as to their value and contributions to understanding or historic and cultural heritage.

Additionally, staff follows the MEIR mitigation measures for potential cultural resources. Staff is not aware of any particular circumstance or information that would make impacts to cultural resources a reasonably foreseeable impact that was not identified in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to loss of cultural resources pursuant to CEQA Guideline Section 15179(b)(1).

Within the last five years, the City has lost two lawsuits (Valley Advocates v. COF and Heritage Fresno v. RDA, City of Fresno) related to historical resources that related to six particular buildings at two different particular sites. The CEQA projects at issue were reviewed under independent CEQA documents, not under the MEIR as subsequent projects (*i.e.*, one under a separate EIR and one under a categorical exemption). These projects are site specific and are not reasonably expected to create additional impacts to cultural resources that would affect a finding under Section 15179. These particular projects may be properly assessed under the MEIR focused EIR procedures or mitigated negative declaration procedures under Section 15178 and not affect the overall MEIR findings.

Generation of Noise. The City of Fresno continues to implement mitigation measures and applicable plan policies to reduce the level of noise to which sensitive noise receptors are exposed. These efforts include identification of high noise exposure areas, limiting the development of new noise sensitive uses within these identified areas and conducting noise exposure studies and requiring implementation of appropriate design measures to reduce noise exposure. Staff finds that these efforts have adequately addressed any potential impacts that may have arisen related to noise and is not aware of any facts or circumstance that would make noise impacts have a more severe impact than that identified in the MEIR. Additionally, staff is not aware of any information or data that was not known at the time that the MEIR was certified that would be able to mitigate noise impacts beyond that identified and contemplated by the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to noise impacts pursuant to CEQA Guideline Section 15179(b)(1).

Geology and Soils. The City of Fresno has a predominantly flat terrain with few geologic or soil quality constraints. The City continues to apply applicable local and state construction codes and standards and continues to adopt new standards as appropriate to insure the safety of residents and protection of property improvements.

Staff finds that these codes and standards have adequately addressed any potential impacts that may have arisen related to geology and soils and is not aware of any facts or circumstance that would make impacts related to geology and soils a reasonably foreseeable impact not addressed in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known regarding impacts related to geology and soils pursuant to CEQA Guideline Section 15179(b)(1).

Hazards and Potential Generation of Hazardous Materials The City continues to implement General Plan policies and assure compliance with MEIR mitigation measures as new development is planned and constructed, and as Code Enforcement activities are conducted, in order to prevent flood damage, structural failures due to soil and geologic instability, and wildfire losses. Development in the vicinity of airports has been reviewed and appropriately conditioned with regard to adopted and updated airport safety and noise policies. In consultation with Fresno County Environmental Health and the California Environmental Protection Agency Department of Toxic Substances Control, industrial and commercial facilities that use, handle, or store potentially hazardous materials are appropriately sited, conditioned, and inspected periodically by the Fresno Fire Department to prevent adverse occurrences. Homeland Security regulations have been taken into consideration when reviewing food production, processing and storage facilities, and the City has conducted and participated in multiple emergency response exercises to develop response plans that would protect life, health, and safety in the event of railroad accidents and other potential hazards.

Staff finds that these procedures, as outlined in the 2025 Fresno General Plan and its MEIR (as well as in related regulations and codes pertaining to hazards and hazardous materials) have adequately addressed potential impacts that may have arisen related to hazards. Staff is not aware of any facts or circumstance that would make impacts related to hazards and hazardous materials reasonably foreseeable impacts not addressed in the MEIR. Staff finds that the circumstances have not materially changed from the time the MEIR was certified and/or new information is not known related to impacts from hazards and hazardous materials pursuant to CEQA Guideline Section 15179(b)(1).

Demand for Energy. The City of Fresno has taken a number of steps to reduce energy consumption, both “in house” to set an example, and in the policy arena. The most notable “in-house” actions are the following:

- Construction of solar panel generator facilities at the Municipal Services Center (MSC) and at Fresno-Yosemite International Airport. The MSC facility, completed in 2004, generates 3.05 GWt of energy (equivalent to operation of 286 homes per year) and has resulted in reduction of 966 tons of CO_2 emissions (equivalent to 2,414,877 vehicular miles not driven).

- Replacement of a significant number of vehicles in the municipal fleet with clean air vehicles (please refer to the following table).

CURRENT CITY OF FRESNO "CLEAN AIR" FLEET

50	CNG Transit Buses
4	CNG Trolleys
6	CNG Handi-Ride Buses
59	Retrofitted Diesel Powered Buses with REV (reduced emission vehicle) engines and diesel particulate traps
2	Hybrid (gasoline-electric) Transit Buses
2	Hybrid (diesel-electric) Transit Buses
12	Compressed Natural Gas (CNG) Pickups, Vans and Sedans
7	Flex Fuel Pickups, Vans and Sedans (CNG/Unleaded Fuel)
3	Compressed Natural Gas (CNG) Street Sweepers
52	Hybrid (gasoline-electric) Sedans and Trucks
34	Electric Vehicles
5	Propane Powered Vehicles
103	LNG Powered Refuse Trucks
59	Retrofitted Diesel Powered Refuse Trucks with combination lean NOx catalyst and diesel particulate filters
9	Retrofitted Diesel Powered Street Sweepers with combination lean NOx catalyst and diesel particulate filters
1	Plug-In CNG/Electric Hybrid Refuse Truck
56	Heavy duty diesel trucks and construction equipment equipped with exhaust after-treatment devices
9	Off Road Equipment with exhaust after-treatment devices
473	**Total “Clean Air” Vehicles in the City of Fresno fleet**

In the development standards policy arena, the City is taking numerous steps to increase residential densities and connectivity between residential and commercial land uses, thus facilitating more walking, biking and transit ridership (which has increased 22% in recent months) and saving energy:

- Amended the zoning code to allow development of mixed use projects in all commercial zone districts citywide, and in the C-M and M-1 zone districts within the Central Area.
- Amended the zoning code to allow density bonuses for affordable housing projects. Such bonuses permit density increases of approximately 30%.
- Amended zoning code to eliminate the "drop down" provision, which permitted development at one density range less than that shown on the adopted land use map.
- Amended the zoning code to increase heights in various residential and commercial zone districts and reduce the minimum lot size in the R-1 zone district from 6,000 to 5,000 square feet.
- Initiated the Activity Center Study, which is defining the potential Activity Centers located in Exhibit 6 of the 2025 Fresno General Plan and proposing design classifications and increased density ranges for these centers and corresponding transportation corridors.

Staff is not aware of any facts or circumstance that would make impacts related to energy demands reasonably foreseeable impacts that were not addressed in the MEIR. Staff finds that the circumstances have not materially changed from the time the MEIR was certified and/or new information is not known related to energy demand impacts pursuant to CEQA Guideline Section 15179(b)(1).

Mineral Resources. The City of Fresno has adopted plan policies and City ordinance provisions consistent with requirements of the State of California necessary to preserve access to areas of identified resources and for restoration of land after resource recovery (surface mining) activities. Staff finds that these policies and Fresno Municipal Code provisions have adequately addressed any potential impacts that may have arisen related to mineral resources and is not aware of any facts or circumstance that would make loss of mineral resources a reasonably foreseeable impact not addressed in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to loss of mineral resources pursuant to CEQA Guideline Section 15179(b)(1).

School Facilities. The City of Fresno continues to consult with affected school districts and participate in school site planning efforts to assure the identification of appropriate location alternatives for planned school facilities. Staff is not aware of any information from the school districts or otherwise to demonstrate that adequate school facilities are not being accommodated under the current General Plan and/or that the need for school facilities is expected to cause impacts not identified in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related to need for school facilities pursuant to CEQA Guideline Section 15179(b)(1).

Potential Aesthetic Impacts. Design Guidelines were appended to the 2025 Fresno General Plan through the plan adoption process conducted concurrently with MEIR analysis. As noted previously, General Plan policies encourage and promote infill development and the City of Fresno Planning and Development Department has implemented design guidelines for reviewing infill housing development proposals. The Department has prepared detailed design guidelines for the Tower District Specific Plan area and the Fulton-Lowell Specific Plan area, both of which contain enclaves of unique structures. The City has adopted policies promoting incorporation of public art within private development projects, which will contribute to a more appealing visual environment, benefitting users of the private property as well as the surrounding community. In addition, the City of Fresno and the City of Fresno Redevelopment Agency have funded public improvements which improve the general aesthetic. Staff is not aware of any situation or circumstances where there are reasonably foreseeable aesthetic impacts not identified and assessed in the MEIR. Staff finds that the circumstances have not changed from the time the MEIR was certified and/or new information is not known related aesthetic impacts pursuant to CEQA Guideline Section 15179(b)(1).

Appendix: Status of MEIR Analysis With Regard to Air Quality and Climate Change

APPENDIX

STATUS OF MEIR ANALYSIS WITH REGARD TO AIR QUALITY AND CLIMATE CHANGE

EXECUTIVE SUMMARY

Planning staff has worked closely with the regional San Joaquin Valley Air Pollution Control District (SJVAPCD) since the November 2002 certification of the 2025 Fresno General Plan Master Environmental Impact Report (MEIR). Potential air quality impacts have been analyzed for every environmental assessment initial study done for City development projects. Projects are required to comply with SJVAPCD rules and regulations via conditions of approval and mitigation measures formulated in the MEIR.

Overall, revisitation of these issues leads to the conclusion that, while there have been changes in air quality laws, planning requirements, and rules and regulations since certification of the MEIR, the actual environmental setting has not evidenced degradation of air quality. In conjunction with SJVAPCD attainment plans and attendant rules and regulations that were adopted prior to the certification of the MEIR, policies in the 2025 Fresno General Plan and MEIR mitigation measures aimed at improving air quality appear to be working. Since 2002, data show that pollutant levels have been steadily decreasing for ozone/oxidants and for particulate matter (10 microns and 2 microns in size). Recent adoption of new air quality attainment plans by SJVAPCD, calling for broader and more stringent rules and regulations to achieve compliance with national and state standards, is expected to accelerate progress toward attainment of clean air act standards.

Analysis of global climate change analysis was not part of the MEIR in 2002, due to lack of scientific consensus on the matter and a lack of analytical tools. However, under the MEIR and General Plan mitigation measures and policies for reducing all forms of air pollution, levels of greenhouse gases have been reduced along with the other regulated air pollutants. At this point in time, detailed analysis and conclusions as to the significance of greenhouse gas emissions and strategies for mitigation are still not feasible, because the legislatively-mandated greenhouse gas inventory benchmarking and the environmental analysis policy formulation tasks of the California Environmental Protection Agency Air Resources Board and the Governor's Office of Planning and research are not completed. The information available does not support any conclusion that Site Plan Review Application No. S-13-047 or other City projects would have a significantly adverse impact on global climate change. Similarly, there is insufficient information to conclude that global climate change would have a significantly adverse impact upon the City of Fresno or specific development projects.

SUPPORTING DATA AND ANALYSIS

While there have been changes in air quality regulations since the November 2002 certification of the 2025 Fresno General Plan MEIR, the actual environmental setting has not evidenced degradation of air quality.

The adverse air quality impacts associated with the myriad of human activities potentiated by the long range general plan for the Fresno metropolitan area can be expected to remain significant and unavoidable, and cannot be completely mitigated through the General Plan or through project-level mitigation measures. In order to provide a suitable living environment within the metropolitan area, the General Plan and its MEIR included numerous air pollution reduction measures.

The 2025 Fresno General Plan and its MEIR gave emphasis to pursuing cleaner air as an over-arching goal. The urban form element of the General Plan was designed to foster efficient transportation and to support mass transit and subdivision design standards are being implemented to support pedestrian travel. Strong policy direction in the Public Facilities and Resource Conservation elements require that air pollution improvement be a primary consideration for all land development proposals, that development and public facility projects conform to the 2025 Fresno General Plan and its EIR mitigation measures, and that the City work conjunctively with other agencies toward the goal of improving air quality.

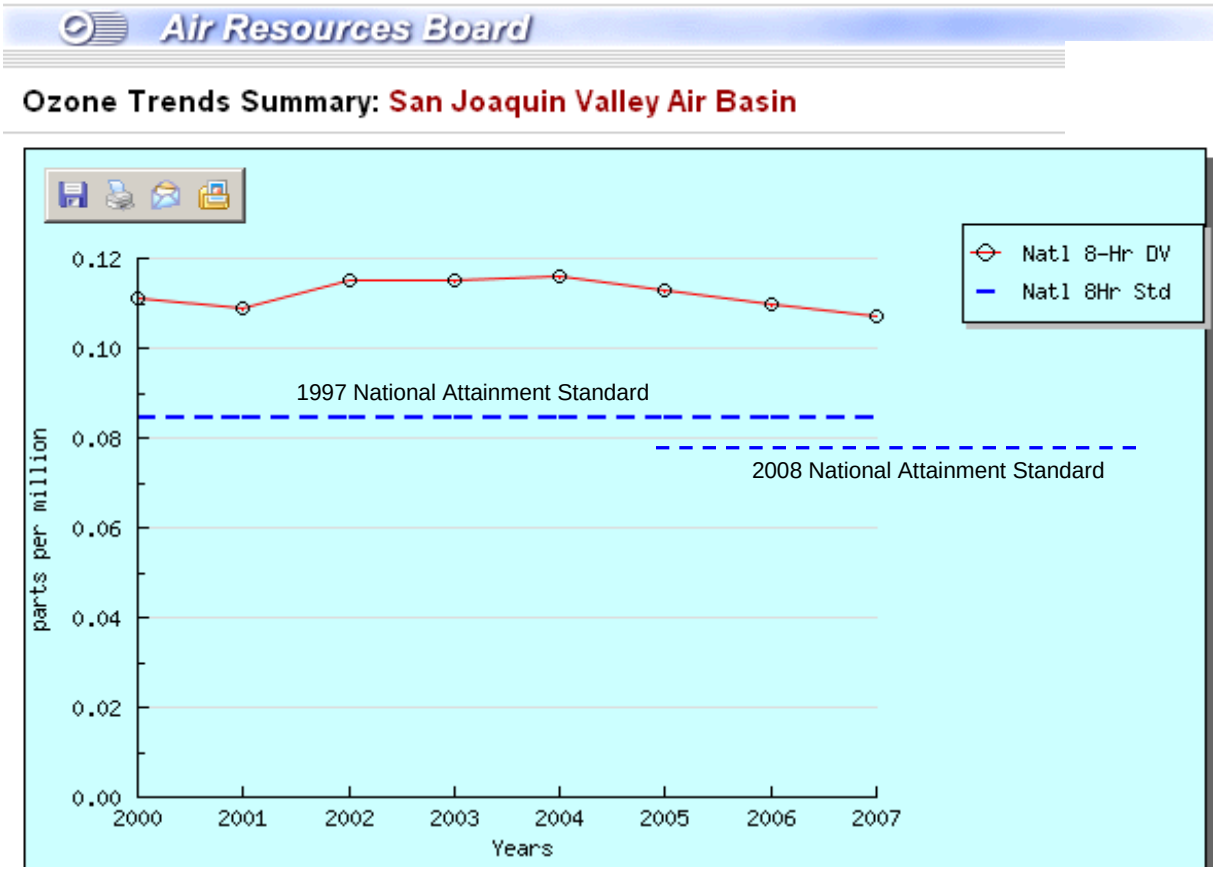
The MEIR mitigation checklist sketched out a series of actions for the City to pursue with regard to its own operations, and City departments are pursuing these objectives. The Fresno Area Express (FAX) bus fleet and the Department of Public Utilities solid waste collection truck fleet are being converted to cleaner fuels. Lighter-duty vehicle fleets are also incorporating alternative fuels and “hybrid” vehicles. Mass transit system improvements are supporting increased ridership. Construction of sidewalks, paseos, bicycle lanes and bike paths is being required for new development projects, and are being incorporated into already-built segments of City rights-of-way with financing from grants, gas tax, and other road construction revenues. Traffic signal synchronization is being implemented. The Planning and Development Department amended the Fresno Municipal Code to ban all types of residential woodburning appliances, thereby removing the most prominent source of particulate matter pollution from new construction.

Pursuant to a specific MEIR mitigation measure, all proposed development projects are evaluated with the “Urbemis” air quality impact model that evaluates potential generation of a range of air pollutants and pollutant precursors from project construction, project-related traffic, and from various area-wide non-point air pollution sources (*e.g.*, combustion appliances, yard maintenance activities, etc.). The results of this “Urbemis” model evaluation are used to determine the significance of development projects’ air quality impacts as well as the basis for any project-specific air quality mitigation measures.

There are no new (*i.e.*, unforeseen in the MEIR) reasonable mitigation measures which have become available since late 2002 that would assure the reduction of cumulative (city-wide) air quality impacts to a less than significant level at project buildout, even with full compliance with attainment plans and rules promulgated by the California Air Resources Board and the San Joaquin Valley Air Pollution Control District.

Through implementation of regional air quality attainment plans by the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD), as supported by implementation of 2025 Fresno General Plan policies and MEIR mitigation measures, air pollution indices have shown improvement. Progress is being made toward attainment of federal and state ambient air quality standards.

Ozone/oxidant levels have shown gradual improvement, as depicted in the following graphs and charts from the California Air Resources Board (graphics with an aqua background) and from the San Joaquin Valley Air Pollution Control District (those with no background color):

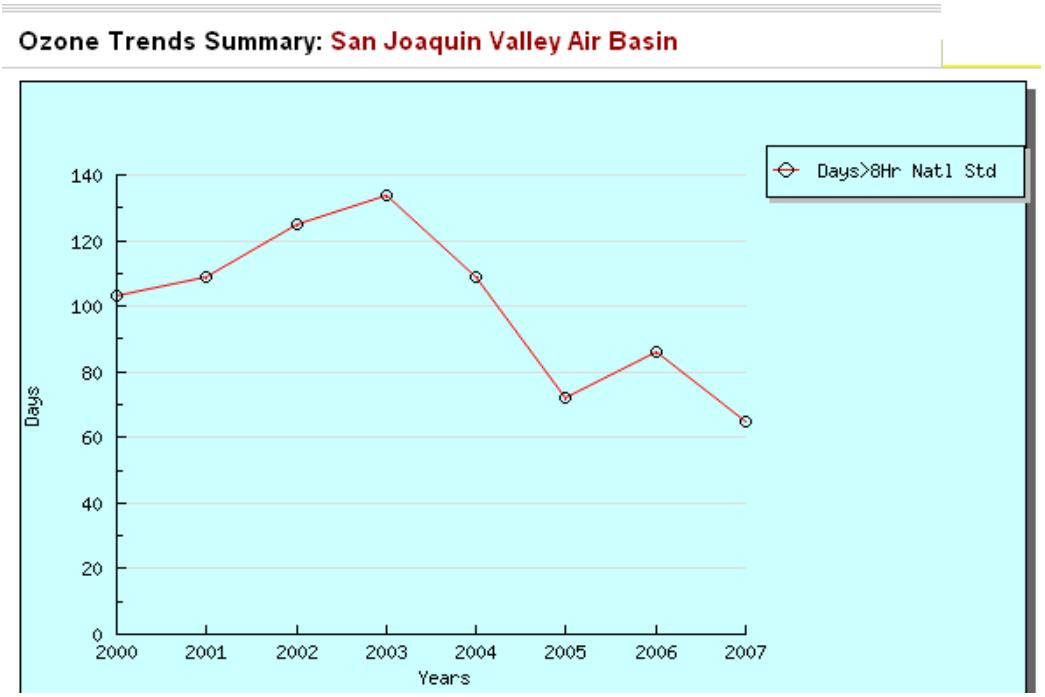


GRAPH NOTES: The "National 1997 8-Hour Ozone Design Value" is a three-year running average of the fourth-highest 8-hour ozone measurement averages in each of the three years (computed according to the method specified in Title 40, Code of Federal Regulations, Part 50, Appendix I).

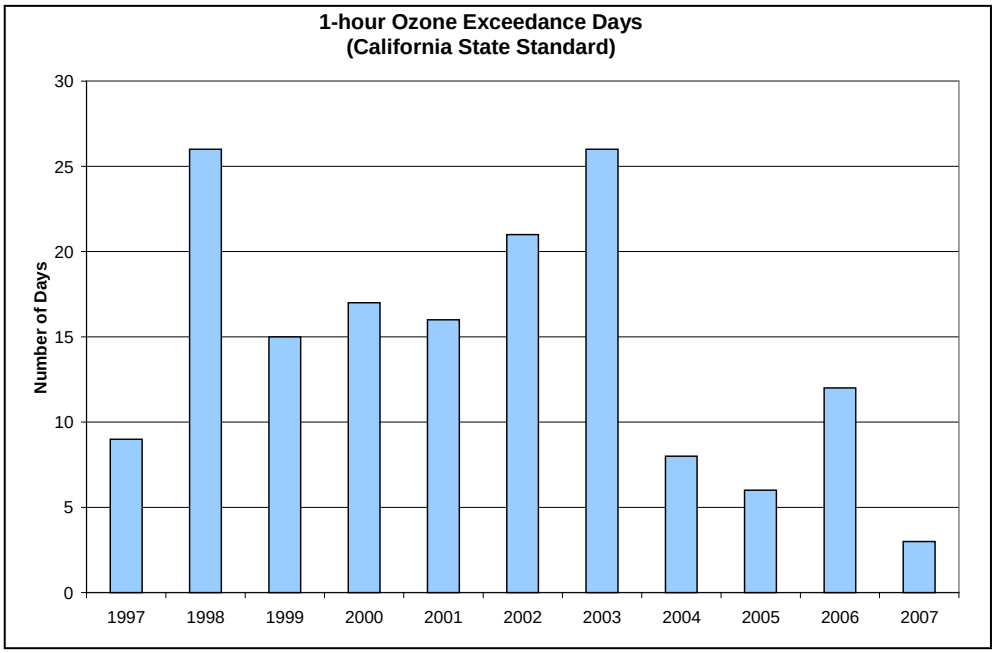
Under the 1997 standard, in effect through the end of 2007, "Attainment" would be achieved if the three-year average were less than, or equal to, 84 parts per billion (ppb), or 0.084 parts per million (ppm). In 2008, a new National 8-Hour Ozone Attainment standard went into effect: a three year average of 75 ppb (0.075 ppm). Data and attainment status for 2008 is expected to become available in 2009."

The California Clean Air Act has a different calculation method for its 8-hr oxidant [ozone] standard design value, and an attainment standard that is lower (0.070 ppm). The ozone improvement trend under the state Clean Air Act 8-hour ozone standard parallels the trend for the national 8-hour standard.

Correspondingly, the number of days per year in which the National 8-hour Ozone Standard has been exceeded have also decreased since the end of 2002:



In 1997, the Federal Clean Air Act repealed the former National 1-hour Ozone standard. However, the California Clean Air Act retains this air pollution parameter. The days per year in which the State of California 1-hour ozone standard has been exceeded have also shown a generally decreasing trend in the time since the 2025 Fresno General Plan MEIR was certified:

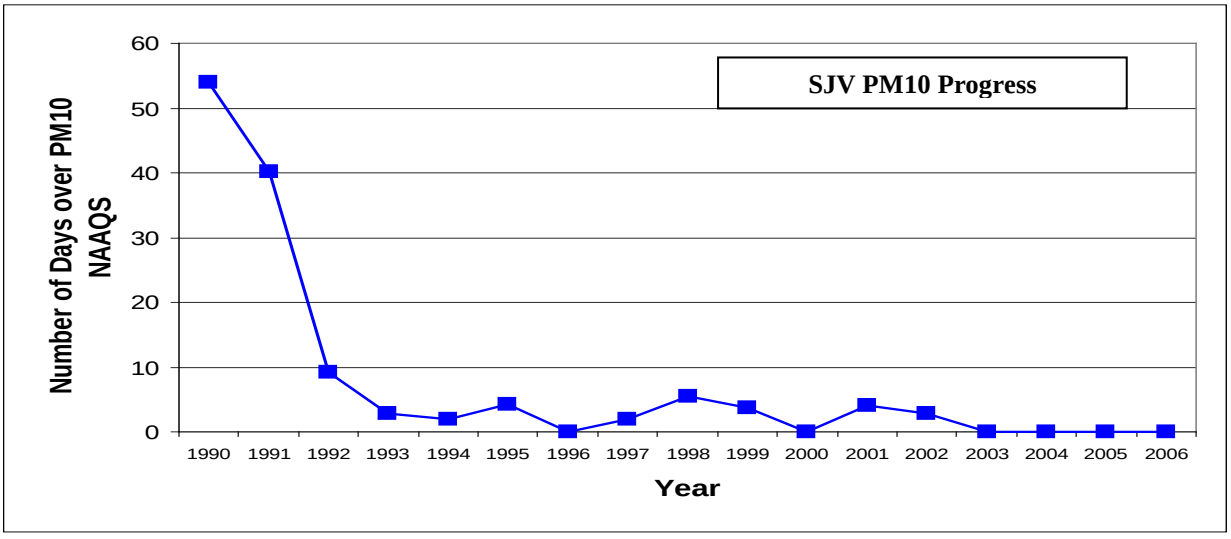


The current ozone attainment plan for the San Joaquin Valley Air Basin, in place when the MEIR for the 2025 Fresno General Plan was certified, is linked to a federal designation of "Serious Nonattainment." While ozone/oxidant air quality conditions are showing a trend toward improvement, the rate of progress toward full attainment is not sufficient to reach the national ambient air quality standards by the target date established by the attainment plan. Mobile sources (vehicle engines) are the primary source for ozone precursors, and the regulation of mobile sources occurs at the national and state levels and is beyond the direct regulatory reach of the regional air pollution control agency. As noted in the 2025 Fresno General Plan MEIR and reflected in the Statement of Overriding Considerations made when the MEIR was certified, potentially significant and unavoidable adverse air quality impacts are inherent in population growth and construction in the City of Fresno, given the Valley's climatology and the limitations on regulatory control of air pollutant precursors.

In 2004, the San Joaquin Valley Air Pollution Control District, in conjunction with the California Air Resources Board, approved a re-designation for the San Joaquin Valley Air Basin to "Extreme Nonattainment" status for ozone, approving a successor air quality attainment plan that projects San Joaquin Valley attainment of the national 8-hour ozone standard by year 2023. This designation and its accompanying attainment plan were submitted to the U.S. Environmental Protection Agency (USEPA) in November of 2004. To date, no formal action has been taken by USEPA to date on the proposed designation or the attainment plan; the Valley remains in "Severe Non- attainment" as of this writing.

The change from "Severe" to "Extreme" ozone Nonattainment would represent an extension of the deadline for attainment, but since the regional air basin would not have achieved attainment by the original deadline, this does not materially affect environmental conditions for the City of Fresno as they were analyzed in the MEIR for the 2025 Fresno General Plan. The proposed revised ozone attainment plan includes not only all the measures in the preceding ozone attainment plan, but additional measures for regulating a wider range of activities to attain ambient air quality standards.

The Valley's progress toward attaining national and state standards for PM-10 (particulate matter less than 10 microns in diameter) has been greater since certification of the MEIR:



As the preceding chart reveals, levels of PM-10 air pollution have decreased since 2002. When the MEIR was certified, the San Joaquin Valley Air Basin was designated in "Serious Nonattainment" for national standards. As of 2007, the number of days where standards were exceeded has decreased to the extent that the Valley has been deemed to be in Attainment. Under Federal Clean Air Act Section 107(d)(3), PM-10 attainment plans and associated rules and regulations remain in place to maintain this level of air quality. New and expanded regulations proposed to combat "Extreme" ozone pollution and PM-2.5 (discussed below) would be expected to provide even more improvement in PM-10 pollution situation.

The 2025 Fresno General Plan provided policy direction in support of "indirect source review" as a method for controlling mobile source pollution. Although vehicle engines and fuels are outside the purview of local and regional jurisdictions in California, approaching mobile source pollution indirectly, through regulation and mitigation of land uses which generate traffic, is an alternative approach.

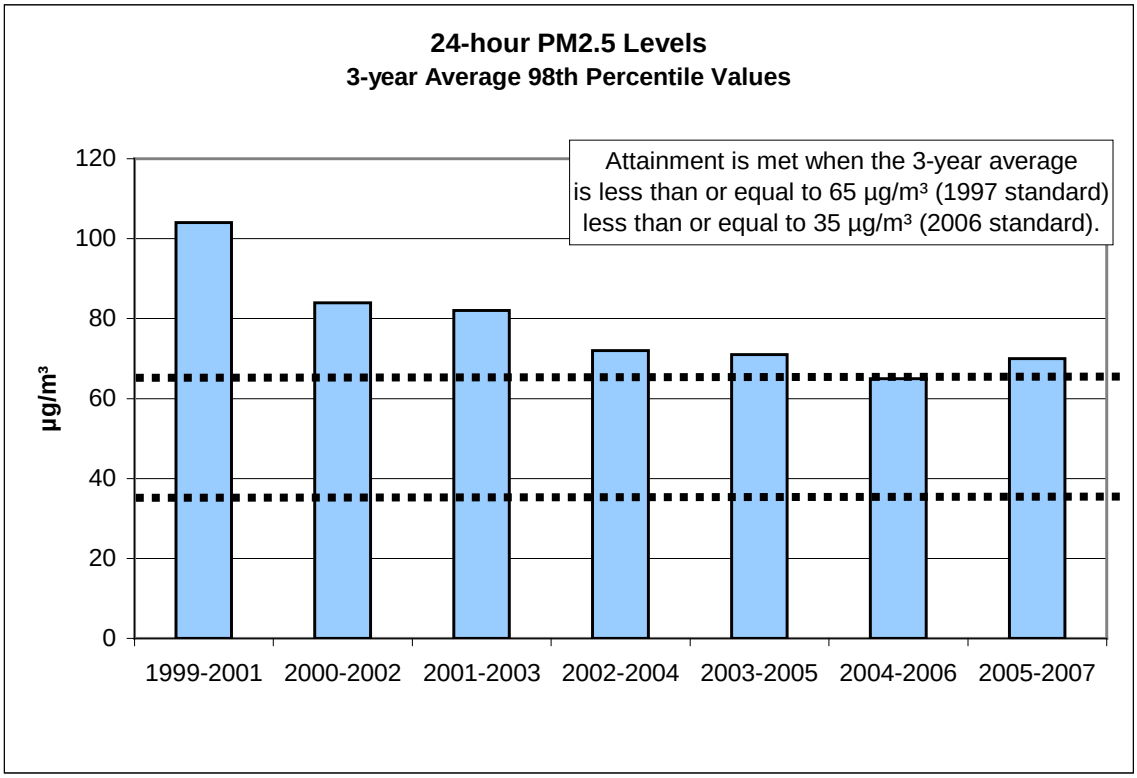
In March of 2006, the San Joaquin Valley Air Pollution Control District adopted Rule 9510, its Indirect Source Review Rule. Full implementation of this Rule has been delayed due to litigation (mitigation fees are being collected and retained in holding accounts), but projects are already being evaluated under Rule 9510 and are implementing many aspects of the Rule, such as clean air design (pedestrian and bike facilities; proximal siting of residential and commercial land uses; low-pollution construction equipment; dust control measures; cleaner-burning combustion appliances, etc.).

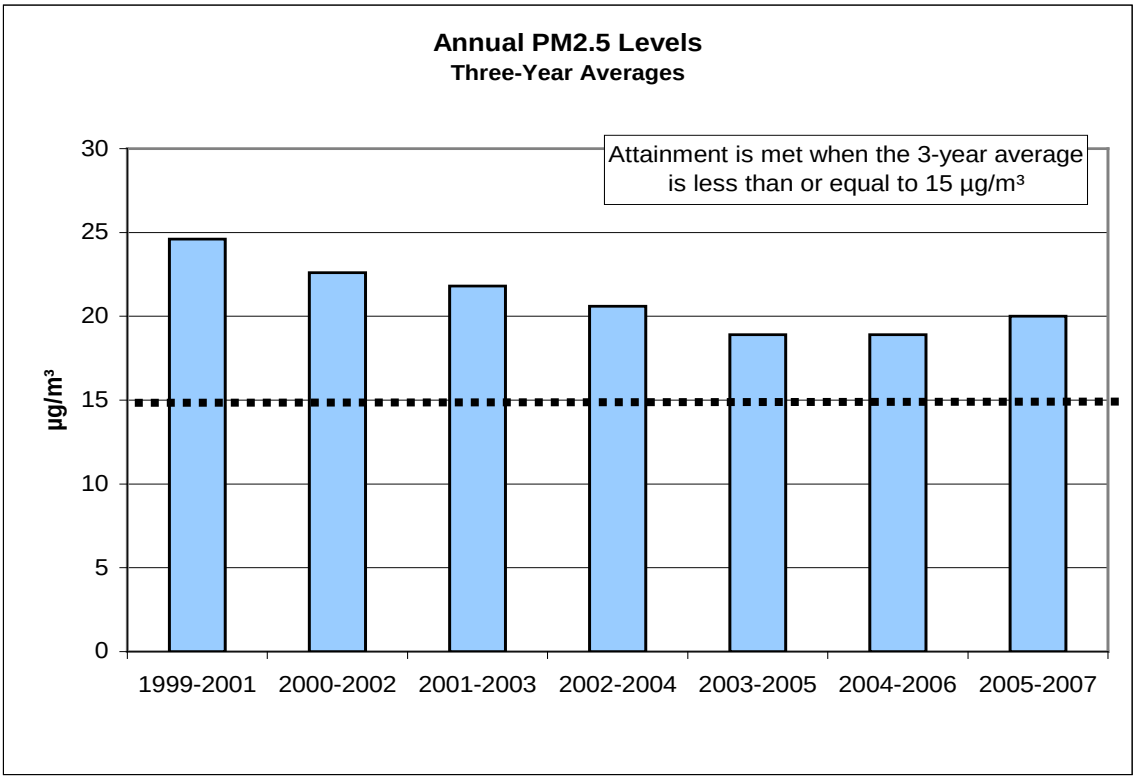
It is anticipated that full implementation (release of mitigation impact fees for various clean air projects throughout the San Joaquin Valley) and subsequent augmentation of the Indirect Source Review Rule will accelerate progress toward attainment of federal and state ozone standards, and will be an important component of the attainment plan for PM-2.5 (very fine particulate matter) and for greenhouse gas reductions to combat global climate change.

PM-2.5 is a newly-designated category of air pollutant, the component of PM-10 comprised of particles 2.5 microns in diameter or smaller. The 1997 Clean Air Act Amendments directed that this pollutant be brought under regulatory control, but federal and state standards/designations had not been finalized when the 2025 Fresno General Plan MEIR was drafted and certified. In the intervening time, the San Joaquin Valley Air Basin has been classified as being in "Nonattainment" for the 1997 federal PM-2.5 standard and for the State PM-2.5 standard.

An attainment demonstration plan for the federal 1997 PM-2.5 standard has been adopted by the SJVAPCD and approved by the California Air Resources Board, and forwarded to the EPA for approval (status as of mid-2008). The attainment plan would achieve compliance with the 1997 federal Clean Air Act PM-2.5 standard by year 2014, in conjunction with California Air Resources Board (and US EPA) action to improve diesel engine emissions. The San Joaquin Valley Air Basin has not yet been classified under the more stringent revised federal 2006 PM-2.5 standard; this classification is expected by 2009.

As with ozone and PM-10 pollution, levels of PM-2.5 have already been reduced by already-existing air quality improvement planning policies, mitigation measures, and regulations. The following charts depict historic PM-2.5 monitoring data for the regional air basin. Once the expected SJVAPCD attainment plan is implemented measures specific to PM-2.5 control, the rate of progress toward attainment of federal and state PM-2.5 standards will accelerate.


24-hour PM2.5 Levels
3-year Average 98th Percentile Values
Attainment is met when the 3-year average is less than or equal to 65 µg/m³ (1997 standard) less than or equal to 35 µg/m³ (2006 standard).
µg/m³
120
100
80
60
40
20
0
1999-2001
2000-2002
2001-2003
2002-2004
2003-2005
2004-2006
2005-2007


Annual PM2.5 Levels
Three-Year Averages
Attainment is met when the 3-year average is less than or equal to 15 µg/m³
µg/m³
30
25
20
15
10
5
0
1999-2001
2000-2002
2001-2003
2002-2004
2003-2005
2004-2006
2005-2007

When the 2025 Fresno General Plan and its MEIR were approved in late 2002, the planning and environmental documents did not directly or separately analyze potential global warming and climate change impacts. However, the general policy direction for consideration of air quality parameters in development project evaluations and for reducing those air pollutants which are already under regulation would operate to control these potential adverse impacts.

"Global warming" is the term coined to describe a widespread climate change characterized by a rising trend in the Earth's ambient average temperatures with concomitant disturbances in weather patterns and resulting alteration of oceanic and terrestrial environs and biota. When sunlight strikes the Earth's surface, some of it is reflected back into space as infrared radiation. When the net amount of solar energy reaching Earth's surface is about the same as the amount of energy radiated back into space, the average ambient temperature of the Earth's surface would remain more or less constant. Greenhouse gases potentially disturb this equilibrium by absorbing and retaining infrared energy, trapping heat in the atmosphere—the "greenhouse gas effect."

The predominant current opinion within the scientific community is that global warming is occurring, and that it is being caused and/or accelerated via generation of excess "greenhouse gases" [GHGs], that natural carbon cycle processes (such as photosynthesis) are unable to absorb sufficient quantities of GHG and cannot keep the level of these gases or their warming effect under control. It is believed that a combination of factors related to human activities, such as deforestation and an increased emission of GHG into the atmosphere from combustion and chemical emissions, is a primary cause of global climate change.

The predominant types of anthropogenic greenhouse gases (those caused by human activity), are described as follows. It should be noted that the starred GHGs are regulated by existing air quality policies and rules pursuant to their roles in ozone and particulate matter formation and/or as potential toxic air contaminants.

- carbon dioxide (CO_2), largely generated by combustion activities such as coal and wood burning and fossil fuel use in vehicles but also a byproduct of respiration and volcanic activity;

- *methane (CH_4), known commonly as "natural gas," is present in geologic deposits and is also evolved by anaerobic decay processes and animal digestion. On a ton-for-ton basis, CH_4 exerts about 20 times the greenhouse gas effect of CO_2;

- *nitrous oxide (N_2O), produced in large part by soil microbes and enhanced through application of fertilizers. N_2O is also a byproduct of fossil fuel burning: atmospheric nitrogen, an inert gas that makes up a large proportion of the atmosphere, is oxidized when air is exposed to high-temperature combustion. N_2O is used in some industrial processes, as a fuel for rocket and racing engines, as a propellant, and as an anesthetic. N_2O is one component of "oxides of nitrogen" (NOX), long recognized as precursors of smog-causing atmospheric oxidants.

- *chlorofluorocarbons (CFCs), synthetic chemicals developed in the late 1920s for use as improved refrigerants (*e.g.*, "Freon™"). It was recognized over two decades ago that this class of chemicals exerted powerful and persistent greenhouse gas effects. In 1987, the Montreal Protocol halted production of CFCs.

- *hydrofluorocarbons (HFCs), another class of synthetic refrigerants developed to replace CFCs;
- *perfluorocarbons (PFCs), used in aluminum and semiconductor manufacturing, have an extremely stable molecular structure, with biological half-lives tens of thousands of years, leading to ongoing atmospheric accumulation of these GHGs.
- *sulfur hexafluoride (SF_6) is used for insulation in electric equipment, semiconductor manufacturing, magnesium refining and as a tracer gas for leak detection. Of any gas evaluated, SF_6 exerts the most powerful greenhouse gas effect, almost 24,000 times as powerful as that of CO_2 on a ton-for-ton basis.
- water vapor, the most predominant GHG, and a natural occurrence: approximately 85% of the water vapor in the atmosphere is created by evaporation from the oceans.

In an effort to address the perceived causes of global warming by reducing the amount of anthropogenic greenhouse gases generated in California, the state enacted the Global Warming Solutions Act of 2006 (Codified as Health & Safety Code Section 38501 *et seq.*). Key provisions include the following:

Δ Codification of the state's goal by requiring that California's GHG emissions be reduced to 1990 “baseline” levels by 2020.

Δ Set deadlines for establishing an enforcement mechanism to reduce GHG emissions:

- By June 30, 2007, the California Air Resources Board ("CARB") was required to publish “discrete early action” GHG emission reduction measures. Discrete early actions are regulations to reduce greenhouse gas emissions to be adopted by the CARB and enforceable by January 1, 2010;
- By January 1, 2008, CARB was required to identify what the state's GHG emissions were in 1990 (set the “baseline”) and approve a statewide emissions limit for the year 2020 that is equivalent to 1990 levels. (These statewide baseline emissions have not yet been allocated to regions, counties, or smaller political jurisdictions.) By this same date, CARB was required to adopt regulations to require the reporting and verification of statewide greenhouse gas emissions.
- By January 1, 2011, CARB must adopt emission limits and emission reduction measures to take effect by January 1, 2012.

As support for this legislation, the Act contains factual statements regarding the potential significant impacts on California's physical environment that could be caused by global warming. These include, an increase in the intensity and duration of heat waves, the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snow pack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

On August 24, 2007, California also enacted legislation (Public Resources Code §§ 21083.05 and 21097) requiring the state Resources Agency to adopt guidelines for addressing climate change in environmental analysis pursuant to the California Environmental Quality Act. By July 1, 2009, the Governor's Office of Planning and Research (OPR) is required to prepare

guidelines for the mitigation of greenhouse gas emissions, and transmit those draft regulations to the Resources Agency. The Resources Agency must then certify and adopt the guidelines by January 1, 2010.

The recently-released update of the Urbemis computer model (used by the City of Fresno Planning and Development Department for environmental assessments, pursuant to a specific MEIR mitigation measure) does provide data on the amounts of CO_2 and oxides of nitrogen (NOX) potentially generated by development projects. However, at this point in time, neither CARB nor the SJVAPCD has determined what the 1997 baseline or current "inventory" of GHGs is for the entire state nor for any region or jurisdiction within the state. No agency has adopted GHG emission limits and emission reduction measures, and because CEQA guidelines have not been established for the evaluation and mitigation of greenhouse gas emissions (there is an absence of regulatory guidance). Therefore, the City is unable to productively interpret the results of the Urbemis model with regard to GHGs, and there is currently no way to determine the significance of a project's potential impact upon global warming.

The 2025 Fresno General Plan provides an integrated combination of residential, commercial, industrial, and public facility uses allowing for proximate location of living, work, educational, recreational, and shopping activities within Fresno metropolitan area. This combination of uses has been identified as a potential mitigation measure to address global warming impacts in a document published by the California Attorney General's Office entitled, *The California Environmental Quality Act Mitigation of Global Warming Impacts* (updated January 7, 2008). Specifically, this document describes this mitigation measure as follows, "Incorporate mixed-use, infill and higher density development to reduce vehicle trips, promote alternatives to individual vehicle travel, and promote efficient delivery of services and goods"—echoing objectives and policies of the 2025 Fresno General Plan adopted in late 2002.

The General Plan contains a mix of land uses would be expected to generate fewer vehicle miles traveled per capita, leading to reduced emissions of greenhouse gases from engine emissions. It provides for overall denser development with high-intensity enclaves, associated with increased public transit use. The plan fosters mixed use and infill development (being implemented by mixed-use zoning ordinances added to the Fresno Municipal Code, as directed by 2025 Fresno General Plan) policies. The urban form element distributes neighborhood-level and larger commercial development, public facilities such as schools, and recreational sites throughout the metropolitan area, reducing vehicle trips.

Any manufacturing activities that would generate SF_6, HFCs, or PFCs would be subject to subsequent environmental review at the project-specific level, as would any uses which would generate methane on site. The City of Fresno has adopted an ordinance prohibiting installation of any woodburning fireplaces or woodburning appliances in new homes, which would reduce CO_2 and N_2O from wood combustion.

Through updates in the California Building Code and statewide regulation of appliance standards, City development projects conform to state-of-the art energy-efficient building, lighting, and appliance standards as advocated in the California Environmental Protection Agency's publication *Climate Action Team / Proposed Early Actions to Mitigate Climate Change in California* (April 2007) and in CARB's *Proposed Early Actions to Mitigate Climate Change in California* (April 2007). The City has further incentivized "green" building projects by providing subsidies for solar photovoltaic equipment for single-family residential construction, by reducing development standards (including reductions in required parking spaces, which further reduces

air pollutant and GHG emissions), and by improving its landscape and shading standards (a topic included in the Design Guidelines adopted with the 2025 Fresno General Plan).

Updated engine and tire efficiency standards would apply to residents' vehicles, as well as the statewide initiatives applicable to air conditioning and refrigeration equipment, regional transportation improvements, power generation and use of solar energy, water supply and water conservation, landfill methane capture, changes in cement manufacturing processes, manure management (methane digester protocols), recycling program enhancements, and "carbon capture" (also known as "carbon sequestration," technologies for capturing and converting CO_2, removing it from the atmosphere).

Due to the lack of data or regulatory guidance that would indicate the 2025 Fresno General Plan had a significant adverse impact upon global climate change, the relatively small size of the Fresno Metropolitan Area in conjunction with the worldwide scope of GHG emissions, and the emphasis in the 2025 Fresno General Plan upon integrated urban design and air pollution control measures, it could not be concluded in 2002 nor at present that the 2025 Fresno General Plan would have a significant adverse impact on global climate change.

As to potential impacts of global warming upon the 2025 Fresno General Plan: the city is located in the Central Valley, in an urbanized area on flat terrain distant from the Pacific coast and from rivers and streams. It is outside of identified flood prone areas. Based on its location we conclude that Fresno is not likely to be significantly affected by the potential impacts of global climate change such as increased sea level and river/stream channel flooding; nor is it subject to wildfire hazards. While Fresno does contain areas with natural habitat (the San Joaquin Bluffs and Riverbottom), a change in these areas' biota induced by global warming would not leave them bereft of all habitat value—it would simply mean a change in the species which would be encountered in these areas. The 2025 Fresno General Plan preserves this habitat open space area for multiple objectives (protection from soil instability and flood inundation; conservation of designated high-quality mineral resources), so any natural resource species changes in those areas would not constitute a significant adverse impact to the city or a loss of resource area.

Fresno has historically had high ambient summer temperatures and an historic heat mortality level that is among the highest in the state (5 heat-related deaths annually per 100,000 population). Due to the prevalence of air conditioning in dwellings and commercial buildings, an increase in extreme heat days from global warming is not expected by the California Air Resources Board Research Division to significantly increase heat-related deaths in Fresno, as opposed to possible effects in cooler portions of the state such as Sacramento or Los Angeles areas (reference: *Projections of Public Health Impacts of Climate Change in California: Scenario Analysis*, by Dr. Deborah Dreschler, Air Resources Board, April 9, 2008). Increased summertime temperatures which may be caused by global warming will be mitigated by the City's landscaping standards to provide shade trees, by statewide energy efficiency standards which insulate dwellings from heat and cold, and by urban design standards which require east-west orientation of streets and buildings to facilitate solar gain. Fresno has a heat emergency response plan and provides cooling centers and free transportation to persons who do not have access to air conditioning.

Secondary health effects of global warming could include increases in respiratory and cardiac illnesses attributable to poor air quality. The San Joaquin Valley Air Pollution Control District provides daily advisories and warnings in times of high ozone levels to help senior citizens and

other sensitive populations avoid exposure. The SJVAPCD has committed to attainment of fine particulate matter (PM2.5) standards by Year 2014 and to attainment of oxidant/ozone standards by Year 2023, and would adopt additional Rules and emission controls as necessary to decrease emissions inventories by those target dates. There is insufficient information to indicate that global climate change would prevent attainment of air quality parameters affecting health.

Pursuant to 2025 Fresno General Plan policy and MEIR mitigation measures, the City's Department of Public Utilities and Fire Department are required to affirm that adequate water service can be provided to all development projects for potable and fire suppression uses. The City derives much of its water supply from groundwater, using its surface water entitlements from the Kings and San Joaquin Rivers primarily to recharge the aquifer. A high percentage of Fresno's annual precipitation is captured and percolated in ponding basins operated by Fresno Metropolitan Flood Control District. If global climate change leads to a longer rainy season and/or more storm events throughout the year, groundwater supplies could be improved by additional percolation.

The City of Fresno currently treats and distributes only some 20% of its 150,000 acre-foot/year (AFY) surface water entitlement for the municipal water system, directing another 50,000 to 70.000 AFY to recharge activities via ponding basins. Presently, the City is unable to recharge the full balance of its annual entitlement in average and wet years, and releases any unused surface water supplies to area irrigation districts for agricultural use in the metropolitan area, (which further augments groundwater recharge through percolation of irrigated water).

Future surface water plant construction projects envisioned by the 2025 Fresno General Plan would account for less than 120,000 acre-feet per year of the surface supply. The General Plan direction for future Metropolitan Water Resource Management Plans includes exploring the use of recycled treated wastewater for non-potable uses such as landscape irrigation, which would further effectively extending the City's water supply.

If the global climate change were to cause a serious and persistent decrease in Sierra snowpack, some of Fresno's water supply could be affected. However, historic records show that the very long-term prevailing climatic pattern for Central California has included droughts of long (often, multi-year) duration, interspersed with years of excess precipitation. Decades before global climate change was considered as a threat to California's water system, state and local agencies recognized a need to augment water storage capacity for excess precipitation occurring in wet years, to carry the state through the intervening dry years.

The potential for episodic and long-term drought is considered in the city's Metropolitan Water Resource Plan and in its the Urban Water Management Plan Drought Contingency component, to accommodate reductions in available water supplies. In times of extended severe regional or statewide drought, a reprioritization of water deliveries and reallocation for critical urban supplies vs. agricultural use is possible, but it is too speculative at this time to determine what the statewide reprioritization response elements would be (the various responses of statewide and regional water agencies to these situations are not fully formulated and cannot be predicted with certainty). Because the true long term consequences of climate change on California's and Fresno's water system cannot be predicted, and, it is too speculative at this time to conclude that there could be a significant adverse impact on water supply for the 2025 Fresno General Plan due to global climate change.

As noted above, it is theorized that global warming could lead to more energy in the atmosphere and to increased intensity or frequency of storm events. Fresno's long-term weather pattern is that rainfall occurs during episodic and fairly high-intensity events. The Fresno Metropolitan Flood Control District (FMFCD) drainage and flood control Master Plan, which sets policies for drainage infrastructure and grading in the entire Fresno-Clovis area, is already predicated on this type of weather pattern. FMFCD sizes its facilities (which development potentiated by the 2025 Fresno General Plan will help to complete) for "two-year storm events," storms of an intensity expected in approximately 50 percent of average years; however, the urban drainage system design has additional capacity built into the street system so that excess runoff from more intense precipitation events is directed to the street system. The City's Flood Plan Ordinance and grading standards require that finished floor heights be above the crowns of streets and above any elevated ditchbanks of irrigation canals. FMFCD project conditions also preserve "breakover" historic surface drainage routes for runoff from major storms. Ultimately, drain inlets and FMFCD basin dewatering pumps direct severe storm runoff into the network of Fresno Irrigation District canals and pipelines still extant in the metropolitan area, with outfalls beyond the western edge of the metropolitan area.

Scientific information, analytical tools, and standards for environmental significance of global warming and green house gases were not available to the Planning and Development Department in 2002 when the 2025 Fresno General Plan and its MEIR were formulated and approved--and at this point, there is still insufficient data available to draw any conclusions as to the potential impacts, or significance of impacts, related to global climate change for the 2025 Fresno General Plan. Similarly, there is insufficient information to conclude that global warming may have a potentially significant adverse impact upon the 2025 Fresno General Plan. In a situation when it would be highly speculative to estimate impacts or to make conclusions as to the degree of adversity and significance of those impacts, the California Environmental Quality Act allows agencies to terminate the analysis. In that regard, there is no material change in status from the degree of environmental review on this topic contained in the 2025 Fresno General Plan MEIR.

MEIR Mitigation Monitoring Checklist

MASTER ENVIRONMENTAL IMPACT REPORT (MEIR) NO. 10130 / SCH No. 2001071097
ENVIRONMENTAL ASSESSMENT NO. A-09-02 FINDING OF MITIGATED NEGATIVE DECLARATION
FOR THE 2025 FRESNO GENERAL PLAN

Project/EA No. S-13-047 **Date: May 29, 2014**

Mitigation Monitoring Checklist

Following is the mitigation monitoring checklist from MEIR No. 10130 as applied to the above-noted project's environmental assessment, required by City Council Resolution No. 2002-378 and Exhibit E thereof (adopted on November 19, 2002) to certify the MEIR for the 2025 Fresno General Plan Update. On June 25, 2009, through its Resolution No. 2009-146, the City Council adopted Environmental Assessment No. A-09-02 confirming the finding of a Mitigated Negative Declaration prepared for General Plan Amendment Application No. A-09-02 which updated the Air Quality Section of the Resource Conservation Element of the 2025 Fresno General Plan and incorporated additional and revised mitigation measures as necessary within the following monitoring checklist.

A - Incorporated into Project
B - Mitigated
C - Mitigation in Progress
D - Responsible Agency Contacted
E - Part of City-wide Program
F - Not Applicable

NOTE: Letters B-Q in mitigation measures refer to the respective sections of Chapter V of MEIR No. 10130

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
B-1. Development projects that are consistent with plans and policies but that could affect conditions on major street segments predicted by the General Plan MEIR traffic analysis to perform at an Average Daily Traffic (ADT) level of service (LOS) D or better in 2025, with planned street improvements, shall not cause conditions on those segments to be worse than LOS E before 2025 without completing a traffic and transportation evaluation. This evaluation will be used to determine appropriate project-specific design measures or street/transportation improvements that will contribute to achieving and maintaining LOS D.	Prior to approval of land use entitlement	Public Works Dept./Traffic Planning; Development & Resource Management Dept.				X		X
B-2. Development projects that are consistent with plans and policies but that could affect conditions on major street segments predicted by the General Plan MEIR traffic analysis to perform at an ADT LOS E in 2025, with planned street improvements, shall not cause conditions on those segments to be worse than LOS E before 2025 without completing a traffic and transportation evaluation. This evaluation will be used to determine appropriate project-specific design measures or street/ transportation improvements that will contribute to achieving and maintaining LOS E.	Prior to approval of land use entitlement	Public Works Dept./Traffic Planning; Development & Resource Management Dept.				X		X

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
B-3. Development projects that are consistent with plans and policies but that could affect conditions on major street segments predicted by the General Plan MEIR traffic analysis to perform at an ADT LOS F shall not cause further substantial degradation of conditions on those segments before 2025 without completing a traffic and transportation evaluation. This evaluation will be used to determine appropriate project-specific design measures or street/ transportation improvements that will contribute to achieving and maintaining a LOS equivalent to that anticipated by the General Plan. Further substantial degradation is defined as an increase in the peak hour vehicle/capacity (v/c) ratio of 0.15 or greater for roadway segments whose v/c ratio is estimated to be 1.00 or higher in 2025 by the General Plan MEIR traffic analysis.	Prior to approval of land use entitlement	Public Works Dept./Traffic Planning; Development & Resource Management Dept.						X
B-4. For development projects that are consistent with plans and policies, a site access evaluation shall be required to the satisfaction of the Public Works Director. This evaluation shall, at a minimum, focus on the following factors: a. Disruption of vehicular traffic flow along adjacent major streets, appropriate design measures for on-site vehicular circulation and access to major streets (number, location and design of driveway approaches), and linkages to bicycle/pedestrian circulation systems and transit services. b. In addition, for development projects that the City determines may generate a projected 100 or more peak hour vehicle trips (either in the morning or evening), the evaluation shall determine the project's contribution to increased peak hour vehicle delay at major street intersections adjacent or proximate to the project site. The evaluation shall identify project responsibilities for intersection improvements to reduce vehicle delay consistent with the LOS anticipated by the 2025 Fresno General Plan. For projects which affect State Highways, the Public Works Director may direct the site access evaluation to reference the criteria presented in Caltrans Guide for the Preparation of Traffic Impact Studies.	Prior to approval of land use entitlement	Public Works Dept./Traffic Planning; Development & Resource Management Dept.	X			X		

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B - Mitigated
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F - Not Applicable

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
B-5. Circulation and site design measures shall be considered for development projects so that local trips may be completed as much as possible without use of, or with reduced use of, major streets and major street intersections. Appropriate consideration must also be given to compliance with plan policies and mitigation measures intended to promote compatibility between land uses with different traffic generation characteristics.	Prior to approval of land use entitlement	Public Works Dept./Traffic Planning; Development & Resource Management Dept.	X			X		
B-6. New development projects and major street construction projects shall be designed with consideration and implementation of appropriate features (considering safety, convenience and cost-effectiveness) to encourage walking, bicycling, and public transportation as alternative modes to the automobile.	Prior to approval or prior to funding of major street project.	Public Works Dept./Traffic Planning; Development & Resource Management Dept.	X			X		
B-7. Bicycle and pedestrian travel and use of public transportation shall be facilitated as alternative modes of transportation including, but not limited to, provision of bicycle, pedestrian and public transportation facilities and improvements to connect residential areas with public facilities, shopping and employment. Adequate rights-of-way for bikeways, preferably as bicycle lanes, shall be provided on all new major streets and shall be considered when designing improvements for existing major streets.	Ongoing	Public Works Dept./Traffic Planning; Development & Resource Management Dept.	X				X	

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
C-1. In cooperation with other jurisdictions and agencies in the San Joaquin Valley Air Basin, the City shall take the following necessary actions to achieve and maintain compliance with state and federal air quality standards and programs. a. Develop and incorporate air quality maintenance considerations into the preparation and review of land use plans and development proposals. b. Maintain internal consistency within the General Plan between policies and programs for air quality resource conservation and the policies and programs of other General Plan elements. c. City departments preparing environmental review documents shall use computer models (software approved by local and state air quality and congestion management agencies) to estimate air pollution impacts of development entitlements, land use plans and amendments to land use regulations. d. Adopted state and SJVAPCD protocols, standards, and thresholds of significance for greenhouse gas emissions shall be utilized in assessing and approving proposed development projects. e. Continue to route information regarding land use plans, development projects, and amendments to development regulations to the SJVAPCD for that agency's review and comment on potential air quality impacts.	Ongoing	Development & Resource Management Dept.	X			X		

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F - Not Applicable

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
C-2. For development projects potentially meeting SJVAPCD thresholds of significance and/or thresholds of applicability for the Indirect Source Review Rule (Rule 9510) in their unmitigated condition, project applicants shall complete the SJVAPCD Indirect Source Review Application prior to approval of the development project. Mitigation measures incorporated into the ISR analysis shall be incorporated into the project as conditions of approval and/or mitigation measures, as may be appropriate.	Ongoing	Development & Resource Management Dept and SJVAPCD	X			X		
C-3. The City shall implement all of the Reasonably Available Control Measures (RACM) identified in Exhibit A of Resolution No. 2002-119, adopted by the Fresno City Council on April 9, 2002. These measures are presented in full detail in Table VC-3 of the MEIR.	Ongoing	Various city departments					X	
C-4. The City shall continue efforts to improve technical performance, emissions levels and system operations of the Fresno Area Express transit system, through such measures as: a. Selecting and maintaining bus engines, transmissions, fuels and air conditioning equipment for efficiency and low air pollution emissions. b. Siting new transit centers and other multi-modal transportation transfer facilities to maximize utilization of mass transit. c. Continuing efforts to improve transit on-time performance, increase frequency of service, extend hours of operation, add express bus service and align routes to capture as much new ridership as possible. d. Initiating a program to allow employers and institutions (e.g., educational facilities) to purchase blocks of bus passes at a reduced rate to facilitate their incentive programs for reducing single-passenger vehicle use.	Ongoing	Fresno Area Express					X	

A - Incorporated into Project
B - Mitigated
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E - Part of City-Wide Program
F - Not Applicable

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
D-1. The City shall monitor impacts of land use changes and development project proposals on water supply facilities and the groundwater aquifer.	Ongoing	Dept of Public Utilities and Development & Resource Management Dept.	X		X		X	
D-2. The City shall ensure the funding and construction of facilities to mitigate the direct impacts of land use changes and development within the 2025 General Plan boundaries. Groundwater wells, pump stations, intentional recharge facilities, potable and recycled water treatment and distribution systems shall be expanded incrementally to mitigate increased water demands. Site specific environmental evaluations shall precede the construction of these facilities. Results of this evaluation shall be incorporated into each project to reduce the identified environmental impacts.	Ongoing (City-wide); and prior to approval of land use entitlement as applicable	Department of Public Utilities and Development & Resource Management Dept.			X	X	X	
D-3. The City shall implement the future water supply plan described in the City of Fresno Metropolitan Water Resources Management Plan Update and shall continue to update this Plan as necessary to ensure the cost-effective use of water resources and continued availability of good-quality groundwater and surface water supplies.	Ongoing	Department of Public Utilities					X	
D-4. The City shall work with the Fresno Metropolitan Flood Control District to prevent and reduce the existence of urban stormwater pollutants to the maximum extent practical and ensure that surface and groundwater quality, public health, and the environment shall not be adversely affected by urban runoff, and shall comply with NPDES standards.	Ongoing	Development & Resource Management Dept.	X			X	X	

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F - Not Applicable

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
D-5. The City shall preserve undeveloped areas within the 100-year floodway within the city and its general plan area, particularly the San Joaquin Riverbottom, for uses that will not involve permanent improvements which would be adversely affected by periodic floods. The City shall expand this protected area in the Riverbottom pursuant to expanded floodplain and/or floodway maps, regulations, and policies adopted by the Central Valley Flood Protection Board and the National Flood Insurance Protection Program.	Ongoing	Development & Resource Management Dept.					X	
D-6. The City shall establish special building standards for private structures, public structures and infrastructure elements in the San Joaquin Riverbottom that will protect: a. Allowable construction in this area from being damaged by the intensity of flooding in the riverbottom; b. Water quality in the San Joaquin River watershed from flood damage-related nuisances and hazards (e.g., the release of raw sewage); and c. Public health, safety and general welfare from the effects of flood events.	Ongoing	Development & Resource Management Dept.					X	X
D-7. The City shall advocate that the San Joaquin River not be channelized and that levees shall not be used in the river corridor for flood control, except those alterations in river flow that are approved for surface mining and subsequent reclamation activities for mined sites (e.g., temporary berms and small side-channel diversions to control water flow through ponds).	Ongoing	Development & Resource Management Dept.					X	X
D-8. The City shall maintain a comprehensive, long-range water resource management plan that provides for appropriate management and use of all sources of water available to the planning area, and shall periodically update	Ongoing	Department of Public Utilities	X		X	X		

A - Incorporated into Project
B - Mitigated
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D - Responsible Agency Contacted
E - Part of City-Wide Program
F - Not Applicable

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
this plan to ensure that sufficient and sustainable water supplies of good quality will be economically available to accommodate existing and planned urban development. Project-specific and city-wide water conservation measures shall be directed toward assisting in reaching the goal of balancing City groundwater operations by 2025.								
D-9. The City shall continue its current water conservation programs and implement additional water conservation measures to reduce overall per capita water use within the City with a goal of reducing the overall per capita water use in the City to its adopted target consumption rate. The target per capita consumption rate adopted in 2008 is a citywide average of 243 gallons per person per day, intended to be reached by 2020 (which includes anticipated water conservation resulting from the on-going residential water metering program and additional water conservation by all customers: 5% by 2010, and an additional 5% by 2020.)	Ongoing	Department of Public Utilities			X	X		
D-10. All development projects shall be required to comply with City Department of Public Utilities conditions intended for the City to reach its overall per capita water consumption rate target. Project conditions shall include, but are not limited to, water use efficiency for landscaping, use of artificial turf and native plant materials, reducing turf areas, and discouraging the development of artificial lakes, fountains and ponds unless only untreated surface water or recycled water supplies are used for these decorative and recreational water features, as appropriate and sanitary.	Prior to approval of land use entitlement	Department of Public Utilities	X			X		

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F - Not Applicable

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
D-11. When and if the City adopts a formal management plan for recycled and/or reclaimed water, all development shall comply with its standards and requirements. Absent a formal management plan for recycled and/or reclaimed water, new development projects shall install reasonably necessary infrastructure, facilities and equipment to utilize reclaimed and recycled water for landscape irrigation, decorative fountains and ponds, and other water-consuming features, provided that use of reclaimed or recycled water is determined by the Department of Public Utilities to be feasible, sanitary, and energy-efficient.	Prior to approval of development project	Department of Public Utilities				X		X

A - Incorporated into Project
B - Mitigated
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<tr><th>MITIGATION MEASURE</th><th>WHEN IMPLEMENTED</th><th>COMPLIANCE VERIFIED BY</th><th>A</th><th>B</th><th>C</th><th>D</th><th>E</th><th>F</th></tr>
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D-12. All applicants for development projects shall provide data (meeting City Department of Public Utilities criteria for such data) on the anticipated annual water demand and daily peak water demand for proposed projects. If a development project would increase water demand at a project location (or for a type of development) beyond the levels allocated in the version of the City's Urban Water Management Plan (UWMP) in effect at the time the project's environmental assessment is conducted, the additional water demand will be required to be offset or mitigated in a manner acceptable to the City Department of Public Utilities. Allocated water demand rates are set forth in Table 6-4 of the 2008 UWMP as follows:

<table>
<tr><th rowspan="2">FOR GROSS DEVELOPED PROJECT ACREAGE OF THE FOLLOWING DEVELOPMENT CATEGORIES
(Analysis shall include acreage to all street centerlines.)</th><th colspan="3">PER-UNIT FACTORS, in acre-ft/acre/yr, for projects projected to be completed during these intervals:</th></tr>
<tr><th>01/01/2005 THROUGH 12/31/2010</th><th>01/01/2010 THROUGH 12/31/2024</th><th>AFTER 01/01/2025</th></tr>
<tr><td>Single family residential</td><td>3.8</td><td>3.5</td><td>3.5</td></tr>
<tr><td>Multi-family residential</td><td>6.5</td><td>6.2</td><td>6.2</td></tr>
<tr><td>Commercial and institutional</td><td>2</td><td>1.9</td><td>1.9</td></tr>
<tr><td>Industrial</td><td>2</td><td>1.9</td><td>1.9</td></tr>
<tr><td>Landscaped open space</td><td>3</td><td>2.9</td><td>2.9</td></tr>
<tr><td>South East Growth Area</td><td>3.4</td><td>3.2</td><td>3.2</td></tr>
<tr><td colspan="4">NOTE: The above land use classifications and demand allocation factors may be amended in future updates of the Urban Water Management Plan</td></tr>
</table>

</td><td>Prior to approval of development project</td><td>Department of Public Utilities</td><td></td><td></td><td></td><td>X</td><td></td><td>X</td></tr>
</table>

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B - Mitigated
C - Mitigation in Process
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E - Part of City-Wide Program
F - Not Applicable

MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
D-13. The City will conform to the requirements of Waste Discharge Requirements Order 5-01-254, including groundwater monitoring and subsequent Best Practical Treatment and Control (BPTC) assessment and findings.	Ongoing	Department of Public Utilities					X	
E-1. The City shall continue to implement and pursue strengthening of urban growth management service delivery requirements and annexation policy agreements, including urging that the county continue to implement similar measures within the boundaries of the 2025 Fresno General Plan, to promote contiguous urban development and discourage premature conversion of agricultural land.	Ongoing	Development & Resource Management Dept.					X	
E-2. To minimize the inefficient conversion of agricultural land, the City shall pursue the appropriate measures to ensure that development within the planned urban boundary occurs consistent with the General Plan and that urban development occurs within the city's incorporated boundaries.	Ongoing	Development & Resource Management Dept.			X		X	
E-3. The City shall pursue appropriate measures, including recordation of right to farm covenants, to ensure that agricultural uses of land may continue within those areas of transition where planned urban areas interface with planned agricultural areas.	Ongoing	Development & Resource Management Dept.						X

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
E-4. Development of agricultural land, or fallow land adjacent to land designated for agricultural uses, shall incorporate measures to reduce the potential for conflicts with the agricultural use. Implementation of the following measures shall be considered: a. Including a buffer zone of sufficient width between proposed residences and the agricultural use. b. Restricting the intensity of residential uses adjacent to agricultural lands. c. Informing residents about possible exposure to agricultural chemicals. d. Where feasible and permitted by law, exploring opportunities for agricultural operators to cease aerial spraying of chemicals and use of heavy equipment near proposed residences. e. Recordation of right to farm covenants to ensure that agricultural uses of land can continue.	Ongoing	Development & Resource Management Dept.						X
F-1. The City shall ensure the provision for adequate trunk sewer and collector main capacities to serve existing and planned urban and economic development, including existing developed uses not presently connected to the public sewer system, consistent with the Wastewater Master Plan. Where appropriate, the City will coordinate with the City of Clovis and other agencies to ensure that planning and construction of facilities address regional needs in a comprehensive manner.	Ongoing	Dept. of Public Utilities and Development & Resource Management Dept.	X		X	X		
F-2. The City shall continue the development and use of citywide sewer flow monitoring and computerized flow modeling to ensure the availability of sewer collection system capacity to serve planned urban development.	Ongoing	Dept. of Public Utilities				X		

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
F-2-a. The City shall provide for containment and management of leathers and sludge adequate to prevent groundwater degradation.	Ongoing	Dept. of Public Utilities					X	X
F-3. The City shall ensure the provision of adequate sewage treatment and disposal by using the Fresno-Clovis Regional Wastewater Reclamation Facility as the primary facility when economically feasible for all existing and new development within the General Plan area. Smaller, subregional wastewater treatment facilities may also be constructed as part of the regional wastewater treatment system, when appropriate. This shall include provision of tertiary treatment facilities to produce recycled water for landscape irrigation and other non-potable uses. Site specific environmental evaluation and development of Waste Discharge Requirements by the Regional Water Quality Control Board shall precede the construction of these facilities. Mitigation measures identified in these evaluations shall be incorporated into each project to reduce the identified environmental impacts.	Ongoing	Dept. of Public Utilities			X	X		
F-4. The City shall ensure that adequate trunk sewer capacity exists or can be provided to serve proposed development prior to the approval of rezoning, special permits, tract maps and parcel maps, so that the capacities of existing facilities are not exceeded.	Ongoing/prior to approval of land use entitlement	Dept. of Public Utilities and Development & Resource Management Dept.	X			X		

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
F-5. The City shall provide adequate solid waste facilities and services for the collection, transfer, recycling, and disposal of refuse for existing and planned development within the City's jurisdiction. Site specific environmental evaluation shall precede the construction of these facilities. Results of this evaluation shall be incorporated into each project to reduce the identified environmental impacts.	Ongoing/prior to construction	Dept. of Public Utilities	X			X		
G-1. Site specific environmental evaluation shall precede the construction of new police and fire protection facilities. Results of this evaluation shall be incorporated into each project to reduce the identified environmental impacts.	Ongoing/prior to construction	Fire Dept/Police Dept/ Development & Resource Management Dept.						X
H-1. Site specific environmental evaluation shall precede the construction of new public parks. Results of this evaluation shall be incorporated into the park design to reduce the environmental impacts.	Ongoing/prior to construction	Parks and Recreation Dept. & Development & Resource Management Dept.						X
I-1. Projects that could adversely affect rare, threatened or endangered wildlife and vegetative species (or may have impacts on wildlife, fish and vegetation restoration programs) may be approved only with the consent of the California Department of Fish and Game (and the U.S. Fish and Wildlife	Ongoing/prior to approval of land use entitlement	Development & Resource Management Dept.						X

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
Service, as appropriate) that adequate mitigation measures are incorporated into the project's approval.								
I-2. Where feasible, development shall avoid disturbance in wetland areas, including vernal pools and riparian communities along rivers and streams. Avoidance of these areas shall including siting structures at least 100 feet from the outermost edge of the wetland. If complete avoidance is not possible, the disturbance to the wetland shall be minimized to the maximum extent possible, with restoration of the disturbed area provided. New vegetation shall consist of native species similar to those removed.	Ongoing/prior to approval of land use entitlement	Development & Resource Management Dept.						X
I-3. Where wetlands or other sensitive habitats cannot be avoided, replacement habitat at a nearby off-site location shall be provided. The replacement habitat shall be substantially equivalent in nature to the habitat lost and shall be provided at a ratio suitable to assure that, at a minimum, there is no net less of habitat acreage or value. Typically, the U.S. Fish and Wildlife Service and California Department of Fish and Game require a ratio of three replacement acres for every one acre of high quality riparian or wetland habitat lost.	Ongoing/prior to approval of land use entitlement and during construction	Development & Resource Management Dept.						X
I-4. Existing and mature riparian vegetation shall be preserved to the extent feasible, except when trees are diseased or otherwise constitute a hazard to persons or property. During construction, all activities and storage of equipment shall occur outside of the drip lines of any trees to be preserved.	Ongoing/prior to approval of land use entitlement and during construction	Development & Resource Management Dept.						X

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
I-5. Within the identified riparian corridors, environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values and only uses consistent with these values shall be allowed (e.g., nature education and research, fishing and habitat enhancement and protection).	Ongoing/prior to approval of land use entitlement and during construction	Development & Resource Management Dept.						X
I-6. All areas within identified riparian corridors shall be maintained in a natural state or limited to recreation and open space uses. Recreation shall be limited to passive forms of recreation, with any facilities that are constructed required to be non-intrusive to wildlife or sensitive species.	Ongoing/prior to approval of land use entitlement and during construction	Development & Resource Management Dept.						X
J-1. If the site of a proposed development or public works project is found to contain unique archaeological or paleontological resources, and it can be demonstrated that the project will cause damage to these resources, reasonable efforts shall be made to permit any or all of the resource to be scientifically removed, or it shall be preserved in situ (left in an undisturbed state). In situ preservation may include the following options, or equivalent measures: a. Amending construction plans to avoid the resources. b. Setting aside sites containing these resources by deeding them into permanent conservation easements. c. Capping or covering these resources with a protective layer of soil before building on the sites. d. Incorporating parks, green space or other open space into the project to leave these resources undisturbed and to provide a protective cover over them.	Ongoing/prior to approval of land use entitlement	Development & Resource Management Dept.	X		X		X	

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
e. Avoiding public disclosure of the location of these resources until or unless the site is adequately protected from vandalism or theft.								
J-2. An archaeological assessment shall be conducted for the project if prehistoric human relics are found that were not previously assessed during the environmental assessment for the project. The site shall be formally recorded, and archaeologist recommendations shall be made to the City on further site investigation or site avoidance/ preservation measures.	Ongoing/prior to submittal of land use entitlement application	Development & Resource Management Dept.	X				X	
J-3. If there are suspected human remains, the Fresno County Coroner shall be contacted immediately. If the remains or other archaeological materials are possibly of Native American origin, the Native American Heritage Commission shall be contacted immediately, and the California Archaeological Inventory's Southern San Joaquin Valley Information Center shall be contacted to obtain a referral list of recognized archaeologists.	Ongoing	Development & Resource Management Dept./ Historic Preservation Commission staff	X				X	
J-4. Where maintenance, repair stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (Weeks and Grimmer, 1995),	Ongoing	Development & Resource Management Dept./ Historic Preservation Staff						X

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus not significant.								
K-1. The City shall adopt the land use noise compatibility standards presented in Figure VK-2 for general planning purposes.	Ongoing	Development & Resource Management Dept.	X		X		X	
K-2. Any required acoustical analysis shall be performed as required by Policy H-1-d of the 2025 Fresno General Plan for development projects proposing residential or other noise sensitive uses as defined by Policy H-1-a, to provide compliance with the performance standards identified by Policies H-1-a and H-1-k. (Note: all are policies of the 2025 Fresno General Plan.) The following measures can be used to mitigate noise impacts; however, impacts may not be fully mitigated within the 70 dBA noise contour areas depicted on Figure VK-4. ■ Site Planning. See Chapter V for more details. ■ Barriers. See Chapter V for more details. ■ Building Designs. See Chapter V for more details.	Ongoing/upon submittal of land use entitlement application	Development & Resource Management Dept.	X			X		
K-3. The City shall continue to enforce the California Administrative Code, Title 24, Noise Insulation Standards. Title 24 requires that an acoustical analysis be performed for all new multi-family construction in areas where the exterior sound levels exceed 60 CNEL. The analysis shall ensure that the building design limits the interior noise environment to 45 CNEL or below.	Ongoing/prior to building permit issuance	Development & Resource Management Dept.					X	

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MITIGATION MEASURE	WHEN IMPLEMENTED	COMPLIANCE VERIFIED BY	A	B	C	D	E	F
L-1. Any construction that occurs as a result of a project shall conform to current Uniform Building Code regulations which address seismic safety of new structures and slope requirements. As appropriate, the City shall require a preliminary soils report prior to subdivision map review to ascertain site specific subsurface information necessary to estimate foundation conditions. This report shall reference and make use of the most recent regional geologic maps available from the California Department of Conservation, Division of Mines and Geology.	Ongoing	Development & Resource Management Dept.					X	
N-1. The City shall cooperate with appropriate energy providers to ensure the provision of adequate energy generated and distribution facilities, including environmental review as required.	Ongoing	Development & Resource Management Dept.	X			X		
Q-1. The City shall establish and implement design guidelines applicable to all commercial and manufacturing zone districts. These design guidelines will require consideration of the appearance of non-residential buildings that are visible to pedestrians and vehicle drivers using major streets or are visible from proximate properties zoned or planned for residential use.	Ongoing	Development & Resource Management Dept.					X	X

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Project Specific Mitigation Monitoring Checklist

PROJECT-SPECIFIC MITIGATION MONITORING CHECKLIST
Site Plan Review Application No. S-13-047

This monitoring checklist for the above noted environmental assessment is being prepared in accordance with the requirements of the California Environmental Quality Act (CEQA), as required under Assembly Bill 3180, and is intended to establish a project-specific reporting/monitoring program for Site Plan Review Application No. S-13-047. Verification of implementation of these mitigation measures, in addition to the applicable measures specified for this project per the Mitigation Monitoring Checklist prepared for this project pursuant to Master Environmental Impact Report No. 10130 - 2025 Fresno General Plan, will be required upon approval of any special permits and prior to operation. The section numbers below refer to corresponding sections of the Initial Study checklist for this project, using the Appendix G format from the CEQA Guidelines.

I. MITIGATION MEASURES FOR AIR QUALITY

MITIGATION MEASURE	IMPLEMENTED BY	WHEN IMPLEMENTED	VERIFIED BY
Project shall implement and incorporate, as appropriate all mitigation measures as identified in the attached Master Environmental Impact Report No. 10130--2025 Fresno General Plan Mitigation Monitoring Checklist dated May 29, 2014.	Applicant	Processing and review of project proposal prior to approval.	City of Fresno Development & Resource Management Department
Pay applicable Indirect Source Review off-site mitigation fee and adhere to the District's adopted document titled *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA*.	Applicant	Prior to issuance of permits.	City of Fresno Development & Resource Management Department and San Joaquin Valley Air Pollution Control District

Project shall comply with security plan review and audits that are required by the Department of Homeland Security. This is to include facility and transportation security. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and the Department of Homeland Security

II. MITIGATION MEASURES FOR HAZARDS AND HAZARDOUS MATERIALS

MITIGATION MEASURE	IMPLEMENTED BY	WHEN IMPLEMENTED	VERIFIED BY
Approval of any future development entitlements on the subject site must comply with all goals and policies contained in the 2025 Fresno General Plan and the Edison Community Plan.	Applicant	Entitlement processing	City of Fresno Development & Resource Management Department.
Project shall comply with all of the requirements stipulated in the Chemical Storage Guidelines (Chapter 6: Prevention Program (Program 2) prepared by the National Association of Chemical Distributors (NACD) dated January 27, 1999, or its most current form. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and NACD.

Project shall comply with all of the requirements stipulated in the Guidelines for Safe Warehousing of Chemicals prepared by the Center for Chemical Process Safety of the American Institute of Chemical Engineers National Association of Chemical Distributors (NACD) dated 1998, or its most current form. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and NACD.

Project is to implement an "occurrence database" to source all loss producing events such as personal injury, spill, and fire or vehicle accident. Near misses are also to be recorded and investigated in the same system. These events shall be resolved as appropriate through an established "root cause analysis and corrective action (RCACA) process. Historical data shall be available upon request. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits and throughout the life of the project.	City of Fresno Development & Resource Management Department and agency designated for monitoring compliance by law as may be updated.

Incorporate training program to include safety and environmental video training modules, instructed classroom training as well as "tailgate talks, safety meetings, and on-the-job instruction. This shall be monitored through Brenntag's "Pure Safety training software." Modules are to include general awareness, hazard classification, shipping papers, marking and labeling, placarding, emergency response, and packaging selection in UN approved containers. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits and throughout the life of the project.	City of Fresno Development & Resource Management Department and agency designated for monitoring compliance by law as may be updated.
Project shall comply with permits and audits required by the Drug Enforcement Administration which regulate drug precursor chemicals. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and the Drug Enforcement Administration

Project shall comply with an established Illness and Injury Prevention Program to prevent workplace accidents, illness, and injuries. Each branch's program is tailored to be site specific and shall include the following provisions: • Program administrator responsible for implementing and maintaining the program; • Scheduled and unscheduled safety inspections; • Hazard assessment process to analyze any new substance, procedure or equipment introduced into the workplace and develop appropriate controls; • Safety Suggestion Box; • Comprehensive incident investigation to include all accidents and near misses; • Branch specific safety rules; • Appropriate training; • Safety meetings; and • A process to ensure compliance with all elements of the program. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits and throughout the life of the project.	City of Fresno Development & Resource Management Department and agency designated for monitoring compliance by law as may be updated.

Project shall adhere to safety policies, procedures and work instructions, including, but not limited to: • Hazard Communications/Workplace Health and Safety Information System • Use of Personal Protective Equipment • Respiratory Protection • Access Requirements for Contractors at Company Sites • Commercial Carrier Qualifications • Forklift Operations and Safety Practices • Permit-Required Confined Spaces • Lock Out / Tag Out Procedures • Emergency Response and Communications • Facility Inspection and Maintenance • Vehicle Inspection and Maintenance • Safe Loading and Unloading (Bulk and Non-bulk) • Safe Product Storage • Safe Transportation and Delivery • Driver Qualification Process • Site and Transportation Security • Specific work instructions for critical tasks Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits and throughout the life of the project.	City of Fresno Development & Resource Management Department and agency designated for monitoring compliance by law as may be updated.

An Emergency Coordinator (EC) shall be designated to the proposed site to manage the response to hazardous materials/waste incidents resulting from fire, explosion, accidental release, natural disaster, or terrorist activities. This includes an Emergency Preparedness Contingency Plan (EPCP) developed in accordance with Title 40 of the Code of Federal Regulations (CFR) Part 262, Title 29 CFR Section 1910.120 and 1910.38, and California Environmental Protection Agency (CEPA) s.36 (1-3). An EPCP shall be developed for the project site to assist the EC or his/her designee(s) in determining appropriate response procedures. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and agency designated for monitoring compliance by law as may be updated.

Project shall comply with all transportation related permits, vehicle inspections, and facility audits required by the California and United States Department of Transportation related to the project site. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management and the Department of Transportation
Project shall comply with all precursor chemical permits and reporting and audits that are necessary to regulate drug precursor chemicals. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and the California Department of Justice
Project shall comply with all permits and audits required by the California and Federal Environmental Protection Agency. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and the Environmental Protection Agency

Project shall comply with required audits associated with employee safety as required by the Occupational Safety and Health Administration. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to permit issuance	City of Fresno Development & Resource Management Department and the Occupational Safety and Health Administration
Project shall subscribe and comply with the following "non-governmental programs": • American Institute of Baking (food safety) • International Standards Organization ISO 9001:2008 (quality management systems) • National Association of Chemical Distributors (chemical distribution safety and compliance) • National Sanitation Foundation (drinking water safety) Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to permit issuance	City of Fresno Development & Resource Management Department and agency designated for monitoring compliance by law as may be updated.

All emergency plans are to be submitted to the City of Fresno for review and approval prior to permit issuance.	Applicant	Prior to issuance of permits and throughout the life of the project.	City of Fresno Development & Resource Management Department
Project shall participate in a Local Emergency Planning Committee where local response agencies (fire department, public health department, hospitals, etc.) and the community (i.e., District 3 leaders and residents) are made aware of activities and controls that are in place to prevent and control any accidental release of a hazardous material. One example includes "mock-drills" in conjunction with local fire departments to practice the project's counter measures. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits and throughout the life of the project.	City of Fresno Development & Resource Management Department

Brenntag's site assessment "conducted before any new facility is purchased or leased" shall be submitted to the City for review. This assessment is to indicate that there are no existing environmental hazards affecting the health of employees or the public. Including a 50-year chain of title review, review of soil and geologic information and environmental inquiries to local regulatory agencies. A thorough review of any environmental impacts, associated permits, and recordkeeping activities shall be conducted prior to Brenntag closing their existing facility in partnership with Fresno County.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department
Brenntag has a national contract with CURA Emergency Services. CURA has contracts with specialized local contractors throughout the nation. They are available to assist 24 hours per day, 365 days per year to clean up spills. Documentation and agreements shall be submitted to the City for their records.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department

Project shall obtain or prepare the following permits, registrations, and plans and submit to the City and their respective entity for further review: • San Joaquin Valley Air Quality Management District Air Permit • Consolidated Unified Program Agency Permit • California Highway Patrol Hazardous Materials Permit • California Department of Justice Precursor Chemical Permit • Pipeline and Hazardous Materials Safety Administration Hazardous Materials Shipper/Carrier Permit • Federal Highway Administration Operating Authority Permit • Environmental Protection Agency Federal Insecticide, Fungicide and Rodenticide Act Registrations • Occupational Health and Safety Administration Air Pressure Vessel Permit • California Department of Agriculture Feed and Fertilizer Permit • Storm Water Permit • A Storm Water Pollution Prevention Plan • Monitoring Program Plan Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance or permits	City of Fresno Development & Resource Management Department and respective organization referenced

Brenntag shall be regulated through the following agencies and provide verification. Some have been defined further within the Project Specific Mitigation Measures document. Federal: • Occupational Safety & Health Administration • United States Department of Transportation • Federal Motor Carrier Safety Administration • Pipeline Hazardous Materials Safety Administration • Federal Railroad Administration • Environmental Protection Agency • Federal Insecticide, Fungicide, and Rodenticide Act • Food and Drug Administration • Department of Justice • Department of Homeland Security State: • California Occupational Safety & Health Administration • California Environmental Protection Agency • Consolidated Unified Program Agency • California Department of Justice • California Highway Patrol	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and associated agency/department

Onsite containment will be as follows: Within the Building – The areas within the building where hazardous chemicals will be stored shall have a system of curbs, drains, and containment areas that will keep any spills on site and contained until they are appropriately tested, neutralized, and cleaned up. Engineering controls such as scrubbers will be installed to reduce hazardous vapors from affecting the employees and the surrounding areas. Rail Car/Truck Unloading – Liquid chemicals from trucks and railcars shall be offloaded into approved external bulk storage tanks. Those liquid chemicals arriving in trucks shall be offloaded in the tank storage load out area which is designed to contain any spills until they can be appropriately neutralized. Those liquid chemicals arriving by railcar shall be top offloaded into the bulk storage tanks, a process which is designed to help eliminate any catastrophic spills. As a further precautionary measure, the company shall place large plastic bins under the railcar connections to collect any	Applicant	Prior to issuance of permits and throughout the life of the project.	City of Fresno Development & Resource Management Department and Respective Oversight Agency

accidental spillage. The external tanks will shall be used for the storage of the following bulk liquids: • Sodium hydroxide 50% in a 25,000 gallon steel tank. • Sodium hydroxide 50% (low iron) in a 6,200 gallon poly tank. • Potassium hydroxide 50% in a 25,000 gallon steel tank. • Potassium hydroxide 50% (low iron) in a 6,200 gallon poly tank. • Hydrochloric Acid 36.5% in a 25,000 gallon FRP tank • Sodium hypochlorite 12.5% in an 8,300 gallon poly tank and a 6,200 gallon poly tank. • Citric Acid 50% in two 5,500 gallon poly tanks. Tanks and Tanker Load out Area – This area shall be contained within itself for spillage and rainfall and adhere to the following: Concrete containment cells shall be engineered to handle the weight and volume of materials present in the storage tanks. The proposed system is designed to handle 110 percent of the capacity of the largest tank anticipated to be installed, which conforms to the requirements of the California Building Code and the California Fire Code.			

Tanks and tanker load out area and containment area shall be visually inspected on a daily basis. Yard – The entire site has been designed to contain up to 3 inches of rainfall, stored in a depressed area of the site and the truck loading dock. The rainwater is prevented from leaving the site through a valve system. The rainwater, both on the site and in the tank containment area will be tested to assure that no contaminants are present. If there are contaminants, the water will be appropriately treated and retested to assure that they have been neutralized and that the water is safe. Once the water is determined to be safe, the valve is opened and the water will be pumped out to the storm water system. Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.			

Consult with the California Department of Toxic Substances Control and provide the City of Fresno with documentation stating that none of the chemicals housed are defined as "primary toxic substances." Provide proof of initial compliance to the City of Fresno and ongoing proof of compliance to the agency designated for monitoring compliance by law (if applicable) as may be updated.	Applicant	Prior to issuance of permits	City of Fresno Development & Resource Management Department and the Department of Toxic Substances

Storage tanks shall adhere to the following standards: • Steel and stainless steel tanks shall be built to American Petroleum Institute (API) or Underwriters Laboratories (UL) standards • Fiberglass (FRP) tanks shall be built to the American Society for Testing and Materials (ASTM) 3299/4097 standards • Poly tanks shall be built to the ASTM D1998 standard • Storage tank system shall be designed to automatically alert the operators when 90% of tank capacity has been reached and to automatically prevent tank capacity from exceeding 95% capacity, as proposed • Tanks shall have individual pumps for each material stored at the facility • Hoses shall be tested at time of purchase and every six months afterwards. Hoses shall be visually inspected with every use for signs of non-compliance	Applicant	Prior to issuance or permits	City of Fresno Development & Resource Management Department

Summary Review Letter
San Joaquin Valley Air Pollution Control District

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

May 22, 2014

Nathan Bouvet, Planner III
City of Fresno
Development and Resource Management
2600 Fresno Street, Third Floor
Fresno, CA 93721-3604

Project: Site Plan Review Application No. S-13-047 – Brenntag Pacific, Inc. Chemical Warehouse by McCall Pacific, LLC

District CEQA Reference No: 20130799

Dear Mr. Bouvet:

The San Joaquin Valley Unified Air Pollution Control District (District) reviewed the project referral for the proposed chemical warehouse and sales office to be located at 175 N. Hughes Avenue, Fresno (APN 458-020-70) and provided comments to the City on September 27, 2013. District staff **met with the applicant's consultant and** participated in a conference call with the applicant on April 21, 2014, to discuss the **District's comments** regarding what is needed to assess potential impacts on air quality and applicability to District rules and regulations. Below is a summary of **the District's** previous comments and the discussion with the applicant regarding what is required to move forward with the project.

1) **Summary of Prior Comments 1-3:** The District commented that the CEQA referral did not provide sufficient information to allow the District to assess the **project's potential impact on air quality.** The District recommended that a more detailed preliminary review of the project be provided and that the review should quantify criteria pollutant emissions, evaluate nuisance odors, and evaluate potential health risks. The District offered recommendations for discussions to be included in the environmental document being prepared by the City of Fresno.

   Discussion with Applicant: The District is a Responsible Agency for this project. As a Responsible Agency the District complies with CEQA by considering the environmental document prepared by the Lead Agency, and by reaching its own conclusion on whether and how to approve the project involved (CEQA Guidelines §15096). The District has permitting authority over stationary sources only. As

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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such, the District recommends that the environmental review evaluate impacts from permitted stationary sources separately from mobile and other non-permitted sources.

Stationary Source Criteria Pollutants: The project is subject to District permitting requirements; therefore, the District concludes that, through project design elements and compliance with District rules and regulations, project related stationary source criteria pollutant emissions would have a less than significant impact on air quality.

Mobile and Other Non-Permitted Source Criteria Pollutants: Without an emissions analysis quantifying criteria pollutant emissions from mobile and other non-permitted sources, the District does not have sufficient information to determine potential impacts from mobile and non-permitted sources. The District recommends that the project's consultant quantify the emissions from project related mobile and other non-permitted sources. If the emissions from these sources would not exceed the District's thresholds of significance of 10 tons/year ROG, 10 tons/year NOx, or 15 tons/year PM10, then project related criteria pollutant emissions from mobile and non-permitted sources would be expected to have a less than significant impact on air quality.

Health Risks from Stationary Source TAC Emissions: Toxic Air Contaminants (TACs) are defined as air pollutants which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. This project is subject to District permitting requirements; therefore, the District concludes that, through project design elements and compliance with District rules and regulations, project related stationary source TAC emissions would have a less than significant health risk impact on nearby receptors.

Health Risks from Mobile and Other Non-Permitted Source TAC Emissions: Diesel emissions are a source of TAC that are known to the State of California to have a potential health impact on nearby receptors. Without a preliminary assessment or more detailed information regarding diesel truck and locomotive traffic to the project site, the District does not have sufficient information to determine potential health risk impacts from project related diesel emissions.

The District's thresholds of significance for exposure to TACs are:

- Probability of contracting cancer for the Maximally Exposed Individual (MEI) exceeds 10 in one million.
- Ground-level concentrations of non-carcinogenic TACs would result in a Hazard Index greater than 1 for the MEI.

The District recommends that the project's consultant prepare a prioritization screening to determine whether a health risk analysis (HRA) should be prepared. A prioritization is a screening tool used to identify projects or facilities that may have significant health impacts. If the prioritization has a score of less than 1.0, then the project would be considered to have a less than significant health risk and an HRA would not be required. However, if the facility has a prioritization score of 1.0 or more, the facility has the potential to exceed the District's significance threshold for health impacts of 10 in one million and an HRA would be required to determine the project's potential health impacts.

2) **Summary of Prior Comments 4-6:** The District commented that the project may be subject to District Rule 9510 (Indirect Source Review), may be subject to District permitting requirements, and would be subject to additional rules and regulations.

Discussion with Applicant: In general, if a project is subject to District permitting requirements, the project is not subject to District Rule 9510. The project referral submitted to the District did not contain enough information to enable the District to make a determination as to the applicability of District permitting requirements or Indirect Source Review. Upon further discussion with the applicant and consultant, the District finds the following:

District Permits: Pursuant to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review), the project is subject to District permitting requirements. Based on the discussion with the applicant, uncontrolled emissions are expected to exceed two (2) lb/day, and the proposed control devices would require District permits. As such, the District recommends that the City include a condition of project approval requiring the applicant to demonstrate that they have started the District's permitting process with the submittal of an Authority to Construct (ATC) application.

ISR Determination: The District has determined that the primary functions of this project are subject to District Rule 2201 or District Rule 2010. Pursuant to Section 4.4.3 of District Rule 9510, a development project on a facility whose primary functions are subject to District Rule 2201 or District Rule 2010 are exempt from the requirements of Rule 9510. Therefore, an Air Impact Assessment (AIA) application is not required.

District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please contact Jessica Willis by phone at (559) 230-5818, or by e-mail at jessica.willis@valleyair.org.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Jessica R. Willis

For: Chay Thao
Program Manager

AM:jw

cc: Dave Mitchell, First Carbon Solutions

Air Quality Analysis

North America I Europe I Australia I Asia
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FirstCarbon® SOLUTIONS
MICHAEL BRANDMAN ASSOCIATES

May 20, 2014

John Spicer, Engineering Manager
Brenntag Pacific, Inc.
3595 E. Wawona Ave.
Fresno, CA 93725

Re: Brenntag Pacific Fresno Chemical Storage and Distribution Facility

Dear Mr. Spicer:

FirstCarbon Solutions | Michael Brandman Associates (FCS) has prepared an air quality analysis to determine if the Brenntag project would result in significant air quality impacts from criteria pollutants and toxic air contaminants. The results of the analysis are presented below.

Project Modeling Assumptions

FCS used CalEEMod version 2.2 to estimate project criteria pollutant emissions for comparison with San Joaquin Valley Air Pollution Control District (SJVAPCD) thresholds of significance. FCS used the SJVAPCD's Health Risk Assessment Truck Screening Tool to estimate the increase in cancer risk due to the operation of diesel trucks on the project site and from locomotives accessing the site to exchange rail cars.

Assumptions used in the modeling in CalEEMod:

- Warehouse size: 57,760 sf
- Land Use Type: General Heavy Industrial
- Site size: 17.4 acres (1,360 ft x 559 ft = 760,240 sf)
- Construction: July 2014 – April 2015
- Operational Year: 2015
- Modeling used default values for heavy industrial land uses from CalEEMod.

Source: Operational statement and project site plan and consultant estimate for construction schedule

Assumptions for HRA Screening Analysis:

- HD Truck deliveries to site: 2-7 per day (assumed 7 as worst case)
- HD Truck shipments from site: 12-20 per day (assumed 20 as worst case)
- Rail deliveries to site: 3 per week
- Operational Days: 5 days/week or 260 per year
- Truck idling: 15-minutes/delivery
- Truck idling emission factor 0.3217 g/hr PM10 (EMFAC 2011 for 2014 composite fleet)

- Truck running emission factor 0.4219 g/mi PM10 (EMFAC 2011 for 2014 composite fleet)
- Truck speed: 15 mph
- Truck Distance on site/trip 200 meters (estimated with Google Earth)
- Rail emissions duration: 30 minutes per delivery with Switcher Locomotive
- Rail idling emission factor: 31.0 g/hour at idle setting
- Rail emission factor: 76.0 g/hour at throttle setting N2
- Time to transit site in train: 5 minutes
- Trains per year: 156 trains (3/week)
- Distance to nearest residence 300 meters south of the project site across Hughes Ave.

Source: Rail emissions from ARB Health Risk Assessment for the BNSF Railway Barstow Railyard, June 9, 2008.

Air Quality Impact Assessment

The results of the modeling for project construction emissions are provided in Table 1. The CalEEMod modeling runs are provided as an attachment to this letter report. The project would not exceed the SJVAPCD thresholds of significance during construction.

Table 1: Project Construction Emissions

Construction	Emissions (tons/year)			
	ROG	NO_x	PM_{10}	PM2.5
2014 Construction Activities	0.3214	3.0012	0.4123	0.2730
2015 Construction Activities	0.5358	1.1830	0.4123	0.0758
Total	**0.8571**	**4.1842**	**0.4993**	**0.3489**
Air District Threshold (tons/year)	10	10	15	15
Significant (Yes or No)	No	No	No	No

The project operational emissions are presented in Table 2. The CalEEMod results of the analysis are provided as an attachment to this letter report. The results show that the project would not exceed SJVAPCD thresholds of significance during project operation.

Table 2: Project Annual Operational Emissions

Emissions Source	Emissions (tons/year)			
	ROG	NO_x	PM_{10}	PM2.5
Area	0.247	0	0	0
Energy	0.006	0.057	0.004	0.004
Mobile	0.080	0.278	0.093	0.028
Total Annual Emissions (tons/year)	**0.333**	**0.335**	**0.097**	**0.032**
Air District Thresholds	10	10	15	15
Significant (Yes or No)	No	No	No	No

FCS used the SJVAPCD HRA Truck Screening Model to estimate health risk associated with the operation of diesel powered vehicles at the project site. The SJVAPCD toxic air contaminant (TAC) threshold of significance for project operations is an increase in cancer risk of 10 in a million. The result of the analysis show an increase in cancer risk at the nearest sensitive receptor of 1.88 in a million. Therefore, the project's TAC impacts are less than significant. FCS also screened for the nearest worker at a neighboring industrial facility. The nearest worker location is approximately 75 meters southwest of the project site. Using the highly conservative assumptions in the screening model, the increased risk to the most impacted worker is 4.18 in a million. Copies of the spreadsheet output are attached.

Table 3 Health Risk Screening Results for the Nearest Sensitive Receptor

Source	Risk (Cancer Risk per Million)
Heavy Duty Delivery Trucks to the Site Idling	0.041
Heavy Duty Delivery Trucks to the Site (Running Emissions)	0.145
Heavy Duty Shipment Trucks from the Site (Idling Emissions)	0.118
Heavy Duty Shipment Trucks from the Site (Running Emissions)	0.414
Train Idling Emissions	0.662
Train Running Emissions	0.505
Total	1.88
Significant (Yes or No)	No
Note: The nearest sensitive receptor is located at the southeast corner of N. Hughes Avenue and W. Nielson Avenue.	

Table 4 Health Risk Screening Results for the Nearest Worker

Source	Risk (Cancer Risk per Million)
Heavy Duty Delivery Trucks to the Site Idling	0.072
Heavy Duty Delivery Trucks to the Site (Running Emissions)	0483.
Heavy Duty Shipment Trucks from the Site (Idling Emissions)	0.207
Heavy Duty Shipment Trucks from the Site (Running Emissions)	1.38
Train Idling Emissions	1.16
Train Running Emissions	0.884
Total	4.18
Significant (Yes or No)	No
Note: The nearest worker receptor is located southwest of the project site in industrial buildings on the north side of W. Nielson Avenue approximately 75 meters from the project site.	

If you have any questions, please call me at 559.246.3732, or via email at dmitchell@brandman.com.

Sincerely,

David M. Mitchell

David M. Mitchell, Air Quality Services Manager
FirstCarbon Solutions | Michael Brandman Associates
7265 N. First Street, Suite 101
Fresno, CA 93720

Attachments: Modeling Output

Brenntag Pacific Fresno Chemical Storage and Distribution

Fresno County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Heavy Industry	53.76	1000sqft	1.23	53,757.00	0
Other Asphalt Surfaces	0.00		16.17		0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	45
Climate Zone	3			**Operational Year**	2015
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 -

Land Use - Assumed the entire site was paved.

Construction Phase - Reduced construction to reflect metal building

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	300.00	150.00
tblLandUse	LandUseSquareFeet	53,760.00	53,757.00
tblProjectCharacteristics	OperationalYear	2014	2015

2.0 Emissions Summary

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					
2014	0.3214	3.0012	2.0212	2.5900e-003	0.2347	0.1776	0.4123	0.1075	0.1656	0.2730	0.0000	241.0657	241.0657	0.0614	0.0000	242.3560
2015	0.5358	1.1830	0.7999	1.1700e-003	8.6300e-003	0.0783	0.0870	2.3300e-003	0.0735	0.0758	0.0000	106.4852	106.4852	0.0248	0.0000	107.0067
Total	0.8571	4.1842	2.8211	3.7600e-003	0.2433	0.2560	0.4993	0.1098	0.2391	0.3489	0.0000	347.5509	347.5509	0.0863	0.0000	349.3627

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					
2014	0.3214	3.0012	2.0212	2.5900e-003	0.2347	0.1776	0.4123	0.1075	0.1656	0.2730	0.0000	241.0654	241.0654	0.0614	0.0000	242.3557
2015	0.5358	1.1830	0.7999	1.1700e-003	8.6300e-003	0.0783	0.0870	2.3300e-003	0.0735	0.0758	0.0000	106.4851	106.4851	0.0248	0.0000	107.0066
Total	0.8571	4.1842	2.8211	3.7600e-003	0.2433	0.2560	0.4993	0.1098	0.2391	0.3489	0.0000	347.5505	347.5505	0.0863	0.0000	349.3623

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

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	0.2474	0.0000	5.1000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.6000e-004	9.6000e-004	0.0000	0.0000	1.0200e-003
Energy	6.3100e-003	0.0573	0.0482	3.4000e-004		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	213.4906	213.4906	8.0300e-003	2.5600e-003	214.4521
Mobile	0.0798	0.2779	0.8878	1.4600e-003	0.0891	3.9200e-003	0.0930	0.0239	3.6000e-003	0.0275	0.0000	121.3021	121.3021	4.6600e-003	0.0000	121.4004
Waste						0.0000	0.0000		0.0000	0.0000	13.5314	0.0000	13.5314	0.7997	0.0000	30.3247
Water						0.0000	0.0000		0.0000	0.0000	3.9441	19.5695	23.5136	0.4060	9.7500e-003	35.0612
Total	**0.3335**	**0.3352**	**0.9365**	**1.8000e-003**	**0.0891**	**8.2800e-003**	**0.0974**	**0.0239**	**7.9600e-003**	**0.0319**	**17.4755**	**354.3631**	**371.8386**	**1.2184**	**0.0123**	**401.2393**

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	0.2474	0.0000	5.1000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.6000e-004	9.6000e-004	0.0000	0.0000	1.0200e-003
Energy	6.3100e-003	0.0573	0.0482	3.4000e-004		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	213.4906	213.4906	8.0300e-003	2.5600e-003	214.4521
Mobile	0.0798	0.2779	0.8878	1.4600e-003	0.0891	3.9200e-003	0.0930	0.0239	3.6000e-003	0.0275	0.0000	121.3021	121.3021	4.6800e-003	0.0000	121.4004
Waste						0.0000	0.0000		0.0000	0.0000	13.5314	0.0000	13.5314	0.7997	0.0000	30.3247
Water						0.0000	0.0000		0.0000	0.0000	3.9441	19.5695	23.5136	0.4059	9.7300e-003	35.0549
Total	0.3335	0.3352	0.9365	1.8000e-003	0.0891	8.2800e-003	0.0974	0.0239	7.9600e-003	0.0319	17.4755	354.3631	371.8386	1.2183	0.0123	401.2330

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.16	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	7/1/2014	7/14/2014	5	10	
2	Grading	Grading	7/15/2014	8/25/2014	5	30	
3	Building Construction	Building Construction	8/26/2014	3/23/2015	5	150	
4	Paving	Paving	3/24/2015	4/20/2015	5	20	
5	Architectural Coating	Architectural Coating	4/21/2015	5/18/2015	5	20	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 75

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 80,636; Non-Residential Outdoor: 26,879 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Grading	Excavators	2	8.00	162	0.38
Grading	Scrapers	2	8.00	361	0.48
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	7.00	226	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Paving	Pavers	2	8.00	125	0.42
Paving	Rollers	2	8.00	80	0.38
Grading	Rubber Tired Dozers	1	8.00	255	0.40
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Graders	1	8.00	174	0.41
Paving	Paving Equipment	2	8.00	130	0.36
Site Preparation	Rubber Tired Dozers	3	8.00	255	0.40
Building Construction	Welders	1	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
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	23.00	9.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	5.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Site Preparation - 2014

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					0.0903	0.0000	0.0903	0.0497	0.0000	0.0497	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0265	0.2881	0.2148	2.0000e-004		0.0157	0.0157		0.0144	0.0144	0.0000	18.8508	18.8508	5.5700e-003	0.0000	18.9678
Total	**0.0265**	**0.2881**	**0.2148**	**2.0000e-004**	**0.0903**	**0.0157**	**0.1060**	**0.0497**	**0.0144**	**0.0641**	**0.0000**	**18.8508**	**18.8508**	**5.5700e-003**	**0.0000**	**18.9678**

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	4.3000e-004	5.5000e-004	5.4200e-003	1.0000e-005	7.2000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6708	0.6708	4.0000e-005	0.0000	0.6716
Total	**4.3000e-004**	**5.5000e-004**	**5.4200e-003**	**1.0000e-005**	**7.2000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6708**	**0.6708**	**4.0000e-005**	**0.0000**	**0.6716**

3.2 Site Preparation - 2014

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					0.0903	0.0000	0.0903	0.0497	0.0000	0.0497	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0265	0.2881	0.2148	2.0000e-004		0.0157	0.0157		0.0144	0.0144	0.0000	18.8508	18.8508	5.5700e-003	0.0000	18.9678
Total	0.0265	0.2881	0.2148	2.0000e-004	0.0903	0.0157	0.1060	0.0497	0.0144	0.0641	0.0000	18.8508	18.8508	5.5700e-003	0.0000	18.9678

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	4.3000e-004	5.5000e-004	5.4200e-003	1.0000e-005	7.2000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6708	0.6708	4.0000e-005	0.0000	0.6716
Total	4.3000e-004	5.5000e-004	5.4200e-003	1.0000e-005	7.2000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6708	0.6708	4.0000e-005	0.0000	0.6716

3.3 Grading - 2014

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					0.1301	0.0000	0.1301	0.0540	0.0000	0.0540	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1027	1.2108	0.7738	9.3000e-004		0.0582	0.0582		0.0535	0.0535	0.0000	89.1967	89.1967	0.0264	0.0000	89.7502
Total	0.1027	1.2108	0.7738	9.3000e-004	0.1301	0.0582	0.1883	0.0540	0.0535	0.1075	0.0000	89.1967	89.1967	0.0264	0.0000	89.7502

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	1.4300e-003	1.8300e-003	0.0181	3.0000e-005	2.4000e-003	2.0000e-005	2.4200e-003	6.4000e-004	2.0000e-005	6.6000e-004	0.0000	2.2358	2.2358	1.4000e-004	0.0000	2.2387
Total	1.4300e-003	1.8300e-003	0.0181	3.0000e-005	2.4000e-003	2.0000e-005	2.4200e-003	6.4000e-004	2.0000e-005	6.6000e-004	0.0000	2.2358	2.2358	1.4000e-004	0.0000	2.2387

3.3 Grading - 2014

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					0.1301	0.0000	0.1301	0.0540	0.0000	0.0540	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1027	1.2108	0.7738	9.3000e-004		0.0582	0.0582		0.0535	0.0535	0.0000	89.1966	89.1966	0.0264	0.0000	89.7501
Total	0.1027	1.2108	0.7738	9.3000e-004	0.1301	0.0582	0.1883	0.0540	0.0535	0.1075	0.0000	89.1966	89.1966	0.0264	0.0000	89.7501

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	1.4300e-003	1.8300e-003	0.0181	3.0000e-005	2.4000e-003	2.0000e-005	2.4200e-003	6.4000e-004	2.0000e-005	6.6000e-004	0.0000	2.2358	2.2358	1.4000e-004	0.0000	2.2387
Total	1.4300e-003	1.8300e-003	0.0181	3.0000e-005	2.4000e-003	2.0000e-005	2.4200e-003	6.4000e-004	2.0000e-005	6.6000e-004	0.0000	2.2358	2.2358	1.4000e-004	0.0000	2.2387

3.4 Building Construction - 2014

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	0.1779	1.4377	0.8708	1.2300e-003		0.1025	0.1025		0.0965	0.0965	0.0000	113.0561	113.0561	0.0288	0.0000	113.6598
Total	0.1779	1.4377	0.8708	1.2300e-003		0.1025	0.1025		0.0965	0.0965	0.0000	113.0561	113.0561	0.0288	0.0000	113.6598

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	7.3900e-003	0.0558	0.0746	1.0000e-004	2.6900e-003	1.1500e-003	3.8400e-003	7.7000e-004	1.0600e-003	1.8300e-003	0.0000	9.1705	9.1705	1.0000e-004	0.0000	9.1726
Worker	5.0300e-003	6.4400e-003	0.0638	1.0000e-004	8.4600e-003	7.0000e-005	8.5300e-003	2.2500e-003	6.0000e-005	2.3100e-003	0.0000	7.8850	7.8850	4.9000e-004	0.0000	7.8952
Total	0.0124	0.0622	0.1384	2.0000e-004	0.0112	1.2200e-003	0.0124	3.0200e-003	1.1200e-003	4.1400e-003	0.0000	17.0555	17.0555	5.9000e-004	0.0000	17.0678

3.4 Building Construction - 2014

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	0.1779	1.4377	0.8708	1.2300e-003		0.1025	0.1025		0.0965	0.0965	0.0000	113.0560	113.0560	0.0288	0.0000	113.6597
Total	0.1779	1.4377	0.8708	1.2300e-003		0.1025	0.1025		0.0965	0.0965	0.0000	113.0560	113.0560	0.0288	0.0000	113.6597

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	7.3900e-003	0.0558	0.0746	1.0000e-004	2.6900e-003	1.1500e-003	3.8400e-003	7.7000e-004	1.0600e-003	1.8300e-003	0.0000	9.1705	9.1705	1.0000e-004	0.0000	9.1726
Worker	5.0300e-003	6.4400e-003	0.0638	1.0000e-004	8.4600e-003	7.0000e-005	8.5300e-003	2.2500e-003	6.0000e-005	2.3100e-003	0.0000	7.8850	7.8850	4.9000e-004	0.0000	7.8952
Total	0.0124	0.0622	0.1384	2.0000e-004	0.0112	1.2200e-003	0.0124	3.0200e-003	1.1200e-003	4.1400e-003	0.0000	17.0555	17.0555	5.9000e-004	0.0000	17.0678

3.4 Building Construction - 2015

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	0.1061	0.8709	0.5436	7.8000e-004		0.0614	0.0614		0.0577	0.0577	0.0000	70.7584	70.7584	0.0178	0.0000	71.1312
Total	0.1061	0.8709	0.5436	7.8000e-004		0.0614	0.0614		0.0577	0.0577	0.0000	70.7584	70.7584	0.0178	0.0000	71.1312

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	3.8400e-003	0.0300	0.0415	6.0000e-005	1.7000e-003	5.4000e-004	2.2400e-003	4.9000e-004	5.0000e-004	9.8000e-004	0.0000	5.7035	5.7035	5.0000e-005	0.0000	5.7047
Worker	2.8000e-003	3.5800e-003	0.0354	6.0000e-005	5.3300e-003	4.0000e-005	5.3700e-003	1.4200e-003	4.0000e-005	1.4600e-003	0.0000	4.8027	4.8027	2.8000e-004	0.0000	4.8085
Total	6.6400e-003	0.0336	0.0769	1.2000e-004	7.0300e-003	5.8000e-004	7.6100e-003	1.9100e-003	5.4000e-004	2.4400e-003	0.0000	10.5063	10.5063	3.3000e-004	0.0000	10.5132

3.4 Building Construction - 2015

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	0.1061	0.8709	0.5436	7.8000e-004		0.0614	0.0614		0.0577	0.0577	0.0000	70.7583	70.7583	0.0178	0.0000	71.1311
Total	0.1061	0.8709	0.5436	7.8000e-004		0.0614	0.0614		0.0577	0.0577	0.0000	70.7583	70.7583	0.0178	0.0000	71.1311

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	3.8400e-003	0.0300	0.0415	6.0000e-005	1.7000e-003	5.4000e-004	2.2400e-003	4.9000e-004	5.0000e-004	9.8000e-004	0.0000	5.7035	5.7035	5.0000e-005	0.0000	5.7047
Worker	2.8000e-003	3.5800e-003	0.0354	6.0000e-005	5.3300e-003	4.0000e-005	5.3700e-003	1.4200e-003	4.0000e-005	1.4600e-003	0.0000	4.8027	4.8027	2.8000e-004	0.0000	4.8085
Total	6.6400e-003	0.0336	0.0769	1.2000e-004	7.0300e-003	5.8000e-004	7.6100e-003	1.9100e-003	5.4000e-004	2.4400e-003	0.0000	10.5063	10.5063	3.3000e-004	0.0000	10.5132

3.5 Paving - 2015

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	0.0232	0.2518	0.1498	2.2000e-004		0.0142	0.0142		0.0130	0.0130	0.0000	21.2272	21.2272	6.3400e-003	0.0000	21.3603
Paving	0.0212					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0444**	**0.2518**	**0.1498**	**2.2000e-004**		**0.0142**	**0.0142**		**0.0130**	**0.0130**	**0.0000**	**21.2272**	**21.2272**	**6.3400e-003**	**0.0000**	**21.3603**

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	6.3000e-004	8.1000e-004	7.9600e-003	1.0000e-005	1.2000e-003	1.0000e-005	1.2100e-003	3.2000e-004	1.0000e-005	3.3000e-004	0.0000	1.0801	1.0801	6.0000e-005	0.0000	1.0814
Total	**6.3000e-004**	**8.1000e-004**	**7.9600e-003**	**1.0000e-005**	**1.2000e-003**	**1.0000e-005**	**1.2100e-003**	**3.2000e-004**	**1.0000e-005**	**3.3000e-004**	**0.0000**	**1.0801**	**1.0801**	**6.0000e-005**	**0.0000**	**1.0814**

3.5 Paving - 2015

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	0.0232	0.2518	0.1498	2.2000e-004		0.0142	0.0142		0.0130	0.0130	0.0000	21.2272	21.2272	6.3400e-003	0.0000	21.3603
Paving	0.0212					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0444	0.2518	0.1498	2.2000e-004		0.0142	0.0142		0.0130	0.0130	0.0000	21.2272	21.2272	6.3400e-003	0.0000	21.3603

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	6.3000e-004	8.1000e-004	7.9600e-003	1.0000e-005	1.2000e-003	1.0000e-005	1.2100e-003	3.2000e-004	1.0000e-005	3.3000e-004	0.0000	1.0801	1.0801	6.0000e-005	0.0000	1.0814
Total	6.3000e-004	8.1000e-004	7.9600e-003	1.0000e-005	1.2000e-003	1.0000e-005	1.2100e-003	3.2000e-004	1.0000e-005	3.3000e-004	0.0000	1.0801	1.0801	6.0000e-005	0.0000	1.0814

3.6 Architectural Coating - 2015

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	0.3738					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.0700e-003	0.0257	0.0190	3.0000e-005		2.2100e-003	2.2100e-003		2.2100e-003	2.2100e-003	0.0000	2.5533	2.5533	3.3000e-004	0.0000	2.5602
Total	0.3778	0.0257	0.0190	3.0000e-005		2.2100e-003	2.2100e-003		2.2100e-003	2.2100e-003	0.0000	2.5533	2.5533	3.3000e-004	0.0000	2.5602

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	2.1000e-004	2.7000e-004	2.6500e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3600	0.3600	2.0000e-005	0.0000	0.3605
Total	2.1000e-004	2.7000e-004	2.6500e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3600	0.3600	2.0000e-005	0.0000	0.3605

3.6 Architectural Coating - 2015

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	0.3738					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.0700e-003	0.0257	0.0190	3.0000e-005		2.2100e-003	2.2100e-003		2.2100e-003	2.2100e-003	0.0000	2.5533	2.5533	3.3000e-004	0.0000	2.5602
Total	0.3778	0.0257	0.0190	3.0000e-005		2.2100e-003	2.2100e-003		2.2100e-003	2.2100e-003	0.0000	2.5533	2.5533	3.3000e-004	0.0000	2.5602

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	2.1000e-004	2.7000e-004	2.6500e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3600	0.3600	2.0000e-005	0.0000	0.3605
Total	2.1000e-004	2.7000e-004	2.6500e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3600	0.3600	2.0000e-005	0.0000	0.3605

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0798	0.2779	0.8878	1.4600e-003	0.0891	3.9200e-003	0.0930	0.0239	3.6000e-003	0.0275	0.0000	121.3021	121.3021	4.6800e-003	0.0000	121.4004
Unmitigated	0.0798	0.2779	0.8878	1.4600e-003	0.0891	3.9200e-003	0.0930	0.0239	3.6000e-003	0.0275	0.0000	121.3021	121.3021	4.6800e-003	0.0000	121.4004

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Heavy Industry	80.64	80.64	80.64	235,429	235,429
Total	80.64	80.64	80.64	235,429	235,429

4.3 Trip Type Information

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

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.441574	0.064201	0.163401	0.172084	0.043603	0.007188	0.017917	0.077020	0.002062	0.001777	0.006511	0.000795	0.001867

5.0 Energy Detail

4.4 Fleet Mix

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	151.0682	151.0682	6.8300e-003	1.4100e-003	151.6497
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	151.0682	151.0682	6.8300e-003	1.4100e-003	151.6497
NaturalGas Mitigated	6.3100e-003	0.0573	0.0482	3.4000e-004		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	62.4224	62.4224	1.2000e-003	1.1400e-003	62.8023
NaturalGas Unmitigated	6.3100e-003	0.0573	0.0482	3.4000e-004		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	62.4224	62.4224	1.2000e-003	1.1400e-003	62.8023

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	1.16975e+006	6.3100e-003	0.0573	0.0482	3.4000e-004		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	62.4224	62.4224	1.2000e-003	1.1400e-003	62.8023
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		6.3100e-003	0.0573	0.0482	3.4000e-004		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	62.4224	62.4224	1.2000e-003	1.1400e-003	62.8023

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Heavy Industry	1.16975e+006	6.3100e-003	0.0573	0.0482	3.4000e-004		4.3600e-003	4.3600e-003		4.3600e-003	4.3600e-003	0.0000	62.4224	62.4224	1.2000e-003	1.1400e-003	62.8023
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		**6.3100e-003**	**0.0573**	**0.0482**	**3.4000e-004**		**4.3600e-003**	**4.3600e-003**		**4.3600e-003**	**4.3600e-003**	**0.0000**	**62.4224**	**62.4224**	**1.2000e-003**	**1.1400e-003**	**62.8023**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	519293	151.0682	6.8300e-003	1.4100e-003	151.6497
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		**151.0682**	**6.8300e-003**	**1.4100e-003**	**151.6497**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Heavy Industry	519293	151.0682	6.8300e-003	1.4100e-003	151.6497
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Total		151.0682	6.8300e-003	1.4100e-003	151.6497

6.0 Area Detail

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	0.2474	0.0000	5.1000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.6000e-004	9.6000e-004	0.0000	0.0000	1.0200e-003
Unmitigated	0.2474	0.0000	5.1000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.6000e-004	9.6000e-004	0.0000	0.0000	1.0200e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0374					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2100					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.1000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.6000e-004	9.6000e-004	0.0000	0.0000	1.0200e-003
Total	**0.2474**	**0.0000**	**5.1000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**9.6000e-004**	**9.6000e-004**	**0.0000**	**0.0000**	**1.0200e-003**

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	0.0374					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2100					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.1000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.6000e-004	9.6000e-004	0.0000	0.0000	1.0200e-003
Total	**0.2474**	**0.0000**	**5.1000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**9.6000e-004**	**9.6000e-004**	**0.0000**	**0.0000**	**1.0200e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	23.5136	0.4059	9.7300e-003	35.0549
Unmitigated	23.5136	0.4060	9.7500e-003	35.0612

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	12.432 / 0	23.5136	0.4060	9.7500e-003	35.0612
Total		23.5136	0.4060	9.7500e-003	35.0612

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Heavy Industry	12.432 / 0	23.5136	0.4059	9.7300e-003	35.0549
Total		23.5136	0.4059	9.7300e-003	35.0549

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	13.5314	0.7997	0.0000	30.3247
Unmitigated	13.5314	0.7997	0.0000	30.3247

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	66.66	13.5314	0.7997	0.0000	30.3247
Total		13.5314	0.7997	0.0000	30.3247

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Heavy Industry	66.66	13.5314	0.7997	0.0000	30.3247
Total		13.5314	0.7997	0.0000	30.3247

9.0 Operational Offroad

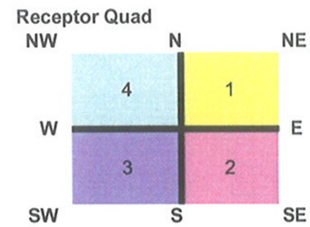
Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation

Truck Idling & TRU's

Date : 20-May-14
Facility Name: Brenntag Pacific
Facility Location: Fresno, CA
Facility ID #:

Calculate Risk



Unit #	Unit Type T = TRU HH = High Horizontal HV = High Vertical LL = Low Level	Operational Time / Event (Hour)	PM10 g/hr	Events/ Year	Receptor Distance (m)	Quad	Load %	Emissions Lb / Yr	Location U=Urban UB=Urban Near Building R=Rural RB=Rural Near Building	Unit Risk	
1 HD	HH	1.75	0.3317	260	300	2	59	1.96E-01	RB	**4.13E-08**	
2 HD	HH	5	0.3317	260	300	2	59	5.61E-01	RB	**1.18E-07**	
3 Tr	HH	0.5	31	156	300	2	59	3.15E+00	RB	**6.62E-07**	
4 Tr	HH	0.167	76	156	300	2	55	2.40E+00	RB	**5.05E-07**	
						2	59	0.00E+00			
						2	60	0.00E+00			
						2	60	0.00E+00			
							60	0.00E+00			
							100	0.00E+00		**1.33E-06**	1.33
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			
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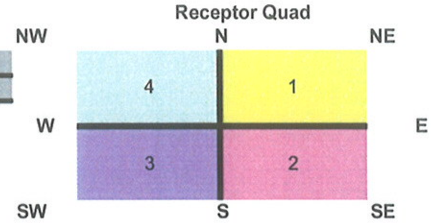
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			

Truck Travel

Date : 5/20/2014
Facility Name: Brenntag Pacific
Facility Location: Fresno, CA
Facility ID #:

Receptor Quad



Calculate Risk

Unit #	Segment Direction EW = East-West NS = North-South NWSE = Northwest-Southeast NESW = Northeast-Southwest	# (50m) Segments	PM10 g/mi	Events/ Year	Receptor Distance (m)	Quad	Load %	Emissions Lb / Yr	Location U=Urban R=Rural	Segment Risk
7	ew	56	0.421926	260	300	2	100	4.21E-01	R	**1.45E-07**
20	ew	160	0.421926	260	300	2	100	1.20E+00	R	**4.14E-07**
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		**5.59E-07**
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
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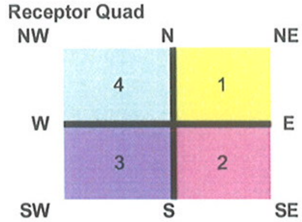
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		

Truck Idling & TRU's

Date : 20-May-14
Facility Name: Brenntag Pacific
Facility Location: Fresno, CA
Facility ID #:

Calculate Risk

Receptor Quad



Unit #	Unit Type T = TRU HH = High Horizontal HV = High Vertical LL = Low Level	Operational Time / Event (Hour)	PM10 g/hr	Events/ Year	Receptor Distance (m)	Quad	Load %	Emissions Lb / Yr	**Location** U=Urban UB=Urban Near Building R=Rural RB=Rural Near Building	Unit Risk	
1 HD	HH	1.75	0.3317	260	75	3	59	1.96E-01	RB	**7.23E-08**	
2 HD	HH	5	0.3317	260	75	3	59	5.61E-01	RB	**2.07E-07**	
3 Tr	HH	0.5	31	156	75	3	59	3.15E+00	RB	**1.16E-06**	
4 Tr	HH	0.167	76	156	75	3	55	2.40E+00	RB	**8.84E-07**	
						2	59	0.00E+00			
						2	60	0.00E+00			
						2	60	0.00E+00			
							60	0.00E+00			
							100	0.00E+00		**2.32E-06**	2.32
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			
							100	0.00E+00			
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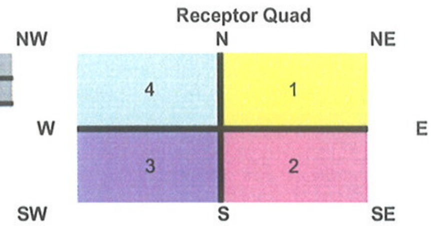
							100	0.00E+00			
							100	0.00E+00			

Truck Travel

Date : 5/20/2014
Facility Name: Brenntag Pacific
Facility Location: Fresno, CA
Facility ID #:



Calculate Risk

Unit #	Segment Direction EW = East-West NS = North-South NWSE = Northwest-Southeast NESW = Northeast-Southwest	# (50m) Segments	PM10 g/mi	Events/ Year	Receptor Distance (m)	Quad	Load %	Emissions Lb / Yr	Location U=Urban R=Rural	Segment Risk
7	ew	56	0.421926	260	75	3	100	4.21E-01	R	**4.83E-07**
20	ew	160	0.421926	260	75	3	100	1.20E+00	R	**1.38E-06**
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		**1.86E-06**
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
							100	0.00E+00		
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							100	0.00E+00		


SOUTHERN PACIFIC RAILROAD
PROPOSED FACILITIES
EXISTING BUILDING
NORTH HAVEN AVENUE
WEST NELSON AVENUE
© 2013 Google

Brenntag Pacific, Inc.
Summary of S.H.E Programs

Brenntag Pacific, Inc.
Summary of S.H.E. Programs

Safety is the Cornerstone of Brenntag's strategy for success. Safety, Health and Environmental Excellence are woven into our day to day operations. Brenntag Pacific, Inc. is committed to maintaining a safe, healthful and environmentally friendly workplace, compliant with all applicable safety, health and environmental laws and regulations.

Safety Programs

Brenntag has developed an Illness and Injury Prevention Program to prevent workplace accidents, illness, and injuries. Each branch's program is tailored to be site specific and includes provisions for the following:

- Program administrator responsible for implementing and maintaining the program;
- Scheduled and unscheduled safety inspections;
- Hazard assessment process to analyze any new substance, procedure or equipment introduced into the workplace and develop appropriate controls;
- Safety Suggestion Box;
- Comprehensive incident investigation to include all accidents and near misses;
- Branch specific safety rules;
- Appropriate training;
- Safety meetings;
- A process to ensure compliance with all elements of the program.

In addition to our Illness and Injury Prevention Program, Brenntag has developed and implemented safety policies, procedures and work instructions to cover all aspects of our business, including, but not limited to:

- Hazard Communications/Workplace Health and Safety Information System
- Use of Personal Protective Equipment
- Respiratory Protection
- Access Requirements for Contractors at Company Sites
- Commercial Carrier Qualifications
- Forklift Operations and Safety Practices
- Permit-Required Confined Spaces
- Lock Out / Tag Out Procedures
- Emergency Response and Communications
- Facility Inspection and Maintenance
- Vehicle Inspection and Maintenance
- Safe Loading and Unloading (Bulk and Non-bulk)
- Safe Product Storage
- Safe Transportation and Delivery
- Driver Qualification Process
- Site and Transportation Security
- Specific work instructions for critical tasks

Brenntag Pacific, Inc.
Summary of S.H.E. Programs

Training Programs

Brenntag's training program includes safety and environmental video training modules, instructed classroom training as well as tailgate talks, safety meetings and on-the-job instruction. Training is also conducted for Brenntag's operating policies and standard operating procedures and work instructions. Compliance with the safety training requirements is monitored through our Pure Safety training software.

Modules specific to Hazardous Materials Regulations and Transporting Dangerous Goods instruct all employees on critical elements of handling and transporting chemicals. Areas covered in this training include:

- General Awareness
- Hazard Classification
- Shipping papers
- Marking and labeling
- Placarding
- Emergency Response
- Packaging selection and UN approved containers

All drivers receive additional instruction on loading/unloading and securing loads.

Verification of employee competency to the requirements is achieved through direct observation by managers and supervisors through our Managing by Walking Around (MBWA) program.

Feedback is provided to employees base on the manager/supervisor's observations. Employees found in compliance with requirements are given positive reinforcement to encourage desirable future behavior. Those employees found out of compliance are provided "consequences" as appropriate to discourage the unsafe or undesirable behavior from continuing.

Risk Management

All loss producing events such as personal injury, spill, fire or vehicle accident are recorded in our loss occurrence database. Near misses are also recorded and investigated in the same system.

These events are resolved as appropriate through a root cause analysis and corrective action (RCACA) process. The system tracks the RCACA to closure and maintains a historical record of the event.

The data derived from these events is used to improve our safety, health and environmental programs.

Brenntag Pacific, Inc.
Summary of S.H.E. Programs

Regulatory Compliance

Brenntag is fully committed to complying with all applicable laws and regulations. Regulatory compliance professionals are in place at the Brenntag North America level as well as Brenntag Pacific this compliance group works as a team to help ensure full compliance with all federal, state and local regulations pertaining to our business.

Brenntag is deeply involved in the National Association of Chemical Distributors (NACD). Responsible Distribution™ (RD) is an NACD initiative that promotes safe and responsible chemical distribution. Participation in the association is contingent on successfully passing a third party audit verifying compliance with the RD protocols.

Some of the agencies that regulate our business include:

- California Department of Justice (regulate drug precursor chemicals)
  - Precursor chemical permits, reporting and audits
- Department of Homeland Security (facility and transportation security)
  - Security plan review and audits
- Department of Transportation (transportation safety)
  - Transportation permits, vehicle inspections and facility audits
- Drug Enforcement Administration (regulate drug precursor chemicals)
  - Permits, audits
- Environmental Protection Agency (protection of the environment)
  - Permits, audits
- Occupational Safety and Health Administration (employee safety)
  - Audits

Non-governmental programs that we subscribe to and comply with:

- American Institute of Baking (food safety)
- International Standards Organization (ISO 9001:2008 quality management systems)
- National Association of Chemical Distributors (chemical distribution safety and compliance)
- National Sanitation Foundation (drinking water safety)

Health and Wellness

Brenntag has programs in place to protect our employees as well as the general public from exposure to the chemical products we distribute. Engineering controls such as scrubbers to reduce hazardous vapors as well as personal protective equipment are used to help ensure a healthful environment in and around our operations.

The company also has a robust personal wellness program that encourages employees and their families to adopt healthy lifestyles including proper diet and exercise. Employees are rewarded with reduced insurance premiums.

Brenntag Pacific, Inc.
Summary of S.H.E. Programs

Emergency / Spill Response Plans

An Emergency Coordinator (EC) has been designated for each Brenntag facility to manage the response to hazardous materials/waste incidents resulting from fire, explosion, accidental release, natural disaster, or terrorist activities. The Emergency Preparedness Contingency Plan (EPCP) has been developed in accordance with Title 40 of the Code of Federal Regulations (CFR) Part 262, Title 29 CFR Section 1910.120 and 1910.38, and CEPA' s.36(1-3). An EPCP has been developed for each Brenntag facility to assist the EC or his/her designees in determining appropriate response procedures and is available upon request.

Brenntag authorizes the EC to commit all company resources necessary to protect the public, the environment, employees, and company property in the event of an accident or emergency at our facilities or during the act of transportation. Response procedures requiring a commitment of company resources may include, but are not limited to, contracting with outside firms to provide emergency cleanup services, repairs, and purchasing supplies/equipment necessary to manage the incident. All emergency plans are reviewed at least annually.

Brenntag participates in Local Emergency Planning Committee activities keeping both the local response agencies (fire department, public health department, hospitals, etc.) and the community aware of our activities and controls in place to prevent and control any accidental release of a hazardous material. We also conduct "mock-drills" in conjunction with our local fire departments to practice our control measures.

Safety, Health & Environmental Audits

Brenntag has an internal environmental and safety department. Safety, Regulatory Compliance and Quality Managers (SRQ) conduct internal audits to ensure that a facility or department is safe and the company is in compliance with standards set by various regulations, statues, and internal policies. Audit reports are generated, which contain action items identified with owners and completion dates. All action items are tracked to closure.

Site Assessments / Closure Plans

Site assessments are conducted before any new facility is purchased or leased. Brenntag will only consider a specific location, when the assessment indicates there are no existing environmental hazards affecting the health of employees or the public. At this time, a baseline (gathered from visual inspection of the site, a 50-year chain of title review, review of soil and geologic information and environmental inquiries to local regulatory agencies) is established. Brenntag's intent and objective is to leave any property as clean as when we started conducting business. A thorough review of any environmental impacts, associated permits, and recordkeeping activities is conducted prior to closing a facility.

Brenntag Pacific, Inc.
Summary of S.H.E. Programs

Product Stewardship

Brenntag manages their business according to the principles and practices of Responsible Care and Responsible Distribution. As a member of the National Association of Chemical Distributors, Brenntag is committed to supporting the industry's efforts in the area of product stewardship to improve the responsible management of chemicals by its end-use customers. All Brenntag activities are conducted in an environmentally responsible manner.

Department of Transportation Hazard Class Chemicals

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Soltrol 170 Isoparaffin	Combusible
Sodium Citrate	Not Regulated
Dissolvine E-39, Keelon 100, Sesquestrene 30A, Dissolve 100S	Not Regulated
Cortron RA-501	Flammable
Acetone	Flammable
Acetone	Flammable
1,4 Dioxane	Flammable
Accosoft 808	Flammable
Methyl Ethyl Ketone	Flammable
Methyl Isobutyl Ketone	Flammable
Methanol	Flammable
Isopar G; Isopar M	Flammable
Toluene	Flammable
Xylene	Flammable
Acetaldehyde 50% in Ethanol	Flammable
Soco Wash Solvent	Flammable
Isopropyl Alcohol	Flammable

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Glycol Ether PTB	Flammable
Accosoft 501	Flammable
Dimethylformamide	Flammable
Lithium Hypochlorite	Oxidizer
Hydrogen Peroxide 6-25%	Oxidizer
Hydrogen Peroxide 50%	Oxidizer
Hydrogen Peroxide 30-35%	Oxidizer
Proxitane EQ Liquid Sanitizer	Oxidizer
Bromine Tablets	Oxidizer
Potassium Permanganate	Oxidizer
Sodium Nitrate	Oxidizer
Sodium Nitrate	Oxidizer
Sodium Persulfate	Oxidizer
Calcium Hypochlorite 65% (All Dry Forms)	Oxidizer
Sodium Percarbonate	Oxidizer
Bioside HS 15%	
Sodium Fluoride	Toxic
Methylene Chloride	Toxic
Sodium Silicofluoride	Toxic

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Brennsolv 7500	Toxic
Phenol	Toxic
Acetic Acid Glacial	Corrosive
Ethylenediamine	Corrosive
Formic Acid 90-95%	Corrosive
Cyclohexylamine	Corrosive
BTC 2125M	Corrosive
Proxel GL	Corrosive
Ammonium Bifluoride	Corrosive
ATI-PFS and ATI-PFS II	Corrosive
Dober Super Reduce (Super Reduce Black)	Corrosive
Turbolizer	Corrosive
Hydrochloric Acid 4%	Corrosive
LACCO Stone AX 150	Corrosive
Hydrochloric Acid 15%	Corrosive
Hydrochloric Acid 20%	Corrosive
Hydrochloric Acid 30-32% Inhibited	Corrosive
Hydrochloric Acid 30-32%	Corrosive
Phosphoric Acid 25-75%	Corrosive
Potassium Hydroxide Flake, Walnut	Corrosive
APC 500 K	Corrosive

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Tart Clean P40	Corrosive
Sunkist KOH Blend	Corrosive
Biokleen ST	Corrosive
Tartrate Cleaner	Corrosive
APC Alkaline Cleaner	Corrosive
Caustic Degreaser	Corrosive
Hot Tank Cleaner #8 Low Foam	Corrosive
Caustic Soda Flake/Beads	Corrosive
Doberalk	Corrosive
E-Max Alkali	Corrosive
Zinc Chloride Solution	Corrosive
Sodium Chlorite Solution 7.5-31% (Akta-Klor, Adox 750/8125)	Corrosive
Nitric Acid 67-71%	Corrosive
Formaldehyde 37/14%	Corrosive
Zinc Chloride	Corrosive
Aluminum Chloride Solution	Corrosive
Dodecylbenzensulfonic Acid	Corrosive
Acetic Acid 80%	Corrosive
Acetic Acid 20%	Corrosive
Sulfuric Acid 92-98% (66Be)	Corrosive
Sulfuric Acid 20-92%	Corrosive
Cupric Chloride Dihydrate	Corrosive
Sulfamic Acid	Corrosive
Sodium Metasilicate (anyhydrous and pentahydrate)	Corrosive
Amino Trimethylene Phosphonic Acid	Corrosive

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
ATI-NAP50	Corrosive
Ferric Nitrate Solution	Corrosive
CN Acid 100	Corrosive
Brennfloc (92212 and 92242)	Corrosive
Protek 301	Corrosive
Aluminum Sulfate 50% Solution	Corrosive
LA Chem Floc	Corrosive
Cat-Flock KL-10	Corrosive
Hydroxyacetic acid 70%	Corrosive
Bio-Soft S-101	Corrosive
Belclene 200, PMA	Corrosive
Belclene 283	Corrosive
Belclene 400	Corrosive
Belclene 515	Corrosive
Belclene 660, HEDP	Corrosive
Belcor 575	Corrosive
Homopolymer of Maleic Acid HPMA	Corrosive
Rhodafac RA-600	Corrosive
Briquest ADPA - 60AW	Corrosive
DM Kosticlor	Corrosive
LACCO Chlorofoam 600	Corrosive
LACCO Foam HD 650	Corrosive
Peeler Blend	Corrosive
E-Max Exact	Corrosive
Organosilane A302	Corrosive
Sodium tolyltriazole 50%	Corrosive
Ammonium Hydroxide	Corrosive
Triton X-100: Triton X-45	Environmentally Hazardous
Sulfur Laccofine	Environmentally Hazardous
Copper Sulfate, Snow, Medium, Powder, All Grades	Environmentally Hazardous
Ferrous Sulfate (Heptahydrate, Monohydrate)	Environmentally Hazardous

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Calamide (C and CW-100)	Environmentally Hazardous
SB Surfactant OP-10	Environmentally Hazardous
E-Max Detergent	Environmentally Hazardous
Paraffin Wax, Wax IGI, BP, All Grades	Combusible
Calsoft F-90 and F-90L	Combusible
Purolite PFC-100H	Combusible
Primary Amyl Acetate	Combusible
Diethylene Glycol	Combusible
Diethylethanolamine	Combusible
Dimethyl Sulfoxide DMSO	Combusible
Dimethyl Sulfone Crystal	Combusible
VM&P Naphtha	Combusible
Citrus Distillate, D-Limonene	Combusible
Mineral Spirits, Mineral Spirits Odorless, Rule 66	Combusible
Silicone XFO, 20S, 30S, 10S, (Series)	Combusible
Sylfat FA-1, Acintol FA-1	Combusible
Sylfat FA-2, Acintol FA-2	Combusible
I-Sil 360E, 350, 391, 335 EFG	Combusible
Surfactant NP-9, Surfonic N-95, Tergitol NP-9	Combusible
Pluronic (All Grades) L-61, L-62	Combusible
Propylene Glycol, Technical, USP and Inhibited	Combusible
Carbowax Series (PEG 200,400)	Combusible

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Calfoam ES 603; ES 303; ES 702; SLS -30	Combusible
Glycerine 99.5%	Combusible
Glycol Ether EB	Combusible
Foamaster NDW	Combusible
Foamaster NXZ & Foamaster VF & VL	Combusible
Monoethanolamine (MEA 85-99%)	Combusible
Cyclohexanone	Combusible
Glycol Ether PNB	Combusible
Aromatic 100 Solvent	Combusible
Phosphorus Acid Crystals	Corrosive
Sodium Bisulfate	Corrosive
LACCO CIP #550	Corrosive
Calsoft LAS-99	Corrosive
ACL-56	Corrosive
Tetrasodium EDTA 39%	Corrosive
Tetrapotassium Pyrophosphate, TKPP 60%	Corrosive
Sodium Hydroxide, Solution 50%	Corrosive
Phosphoric Acid 85%	Corrosive
Sodium Bisulfite Solution 10-38% (SBS)	Corrosive
EDTA (Versene)	Corrosive
CorrKleen HC 430	Corrosive
Ferric Sulfate 50-60% Solution	Corrosive
Belcor 593	Corrosive
Ferric Sulfate	Corrosive
Corrkleen AC 50	Corrosive

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Dowfax 3B2	Corrosive
LACCO Foam Solv #800	Corrosive
CorrKleen FC 50	Corrosive
Potassium Hydroxide 45-50% Liquid	Corrosive
CorrKleen FC 500	Corrosive
Ferric Chloride	Corrosive
Oxalic Acid	Corrosive
Aqua Ammonia	Corrosive
Empilan KR 6	Corrosive
Epon 828/Dow DER 331-OT	Corrosive
Erythorbic Acid	Corrosive
E-Max Precise	Corrosive
Rhodapon BOS	Corrosive
Natrosol 250 MR; Natros Hi-Vis Polymer	Not Regulated
Aerofroth 65 Frother	Flammable
Alcalase	Flammable
Denatured Alcohol, Synasol (all grades)	Flammable
Propane	Flammable
Mineral Spirits	Flammable
LACCO Quat #10	Flammable
Alfonic 810-6	Combusible
Zinc Oxide (all grades)	Not Regulated
Citric Acid	Not Regulated
Diammonium phosphite	Not Regulated
Manganese Carbonate	Not Regulated
Sodium Molybdate	Not Regulated
Sodium Chloride (Salt all types)	Not Regulated
Monopotassium phosphite	Not Regulated
Trisodium Phosphate Chlorinated 10% Solution	Not Regulated
Aquapure 3655	Not Regulated

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Aquatreat AR-900A	Not Regulated
Praestol K148L	Not Regulated
Sodium Hexametaphosphate 35%	Not Regulated
SXS-40 Pilot	Not Regulated
Trisodium Phosphate Chlorinated	Not Regulated
Potassium Sorbate Solution	Not Regulated
Aquapure 3628	Not Regulated
Bannish and Bannish II	Not Regulated
Sodium Bromide 40% (Enviro Brom L40)	Not Regulated
Sodium Gluconate Solution 30-60%	Not Regulated
Sodium Silicate (All Grades) N,40, 41,RU, D, E	Not Regulated
Terracair DEF 32.5%	Not Regulated
Morwet EFW Powder	Not Regulated
Sodium Sulfite (anhydrous, catalyzed, photo)	Not Regulated
Tersperse 2020	Not Regulated
MONOAMMONIUM PHOSPHATE (MAP)	Not Regulated
Monopotassium Pyrophoshate (MKPP)	Not Regulated
Sea Mud	Not Regulated
Monocalcium Phosphate	Not Regulated
Monosodium Glutamate (MSG)	Not Regulated
Alum Granular	Not Regulated
Ammonium Sulfate	Not Regulated
Dissolvine Z-S	Not Regulated
Magnesium Chloride	Not Regulated
Magnesium Sulfate, Epsom Salt	Not Regulated
Malic Acid	Not Regulated
Petro Powder (AA, BA)	Not Regulated
Potassium Sorbate	Not Regulated
Soda Ash	Not Regulated
Sodium Gluconate	Not Regulated
Sodium Sesquicarbonate	Not Regulated

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Titanium Dioxide (All Grades)	Not Regulated
Urea	Not Regulated
Zinc Sulfate (all grades)	Not Regulated
Diammonium Phosphate	Not Regulated
Disodium Phosphate	Not Regulated
Flavourzyme 1000 L.K	Not Regulated
Conqor 404	Not Regulated
Therminol 55	Not Regulated
Alcosperse 459-N	Not Regulated
Alcosperse 602-N	Not Regulated
Aqua Suds	Not Regulated
Aquatreat AR 545	Not Regulated
Calimulse PRS	Not Regulated
Metal Grabber	Not Regulated
Methyl Salicylate	Not Regulated
Neo Solutions (NS Series)	Not Regulated
Petro Liquid (ULF, AA, BA, 22)	Not Regulated
Plurafac RA 40	Not Regulated
Plurafac SLF-180	Not Regulated
Praestol 186 K	Not Regulated
Spindkleen	Not Regulated
Surfactant NP-12, Surfonic N-120	Not Regulated
Triethanolamine 85-99%	Not Regulated
Celvol 205S Polyvinyl Alcohol	Not Regulated
Sodium Bromide	Not Regulated
Ammonium Chloride	Not Regulated
Borax Series (Anhydrous, 5 mol, 10 mol, 30/100)	Not Regulated
Carbowax PEG 8000	Not Regulated
Cream of Tarter	Not Regulated
Dissolvine NA2-P	Not Regulated
EDTA Ferric Sodium/Sequestar Iron Chelate	Not Regulated

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
EDTA Manganese Disodium	Not Regulated
Magnesium Oxide	Not Regulated
Manganese Disodium EDTA	Not Regulated
Potassium Metabisulfite	Not Regulated
Potassium Sulfate	Not Regulated
Sodium Hexametaphosphate	Not Regulated
Sodium Metabisulfite	Not Regulated
Sodium Thiosulfate	Not Regulated
Tartaric Acid	Not Regulated
Tetrasodium Pyroshosphate	Not Regulated
Trisodium Phosphate Crystals	Not Regulated
Benzoic Acid	Not Regulated
BFP 75A and 75K Flake	Not Regulated
EDTA Copper Disodium	Not Regulated
Copper Disodium EDTA	Not Regulated
Sodium Erythorbate	Not Regulated
Tetrapotassium pyrophosphate, TKPP	Not Regulated
Potassium Chloride	Not Regulated
Magnesium Carbonate	Not Regulated
Manganese Sulfate	Not Regulated
Lactic Acid	Not Regulated
Floor Dry/Floor Sweep	Not Regulated
Magnesium Nitrate Hexahydrate	Not Regulated
Food Tech Additive 700	Not Regulated
Gluconic Acid	Not Regulated
Hamposyl L-30	Not Regulated
Naxonate 45SC	Not Regulated
Praestol A3050L	Not Regulated
EDTA Zinc Disodium	Not Regulated
Dipotassium Phosphate	Not Regulated
Potassium Carbonate	Not Regulated

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
2-Ethylhexanol	Combustible
Dober Detergent #27 Revised	Not Regulated
Diethanolamine (DEA)	Not Regulated
NTA Powder, Dissolvine A-92	Not Regulated
Trilon BS Powder	Not Regulated
Trilon BX Powder	Not Regulated
A-Tite	Not Regulated
Isoparaffin 170; LPA-210 Solvent	Combustible
Dicalite, Celatom, Dicaflock Series (All Grades)	Not Regulated
Copper Sulfate Solution 25%	Not Regulated
Sodium tripolyphosphate (HD, LD, PWD)	Oxidizer
Stepanol WA-100	Not Regulated
Calcium Acetate	Not Regulated
Sodium Sulfate	Not Regulated
Ammonium Molybdate	Not Regulated
Boric Acid	Not Regulated
Calfax 10L 45	Not Regulated
Calsoft AOS-40	Not Regulated
CC 2000	Not Regulated
CC 2040	Not Regulated
CIP 560	Not Regulated
Propionic Acid	Not Regulated
Triton CF87	Not Regulated
Polysorbate (T Maz, 20, 20K, 60K, 80K)	Not Regulated
Indole 3 Butyric acid	Not Regulated
Paint Thinner	Combustible
Sodium Aluminum Phosphate	Not Regulated
Calcium Stearate	Not Regulated
Sodium Acid Pyrophosphate	Not Regulated
Sodium Bicarbonate	Not Regulated

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Calcium Phosphate Tribasic (Tricalcium Phosphate)	Not Regulated
Calcium Carbonate/Vicron 15-15	Not Regulated
Alutern TG-2	Not Regulated
Ammonium bicarbonate	Not Regulated
Anilox Roll Cleaning Formula	Not Regulated
Aqualon CMC (all types)	Not Regulated
Polybor	Not Regulated
Bentonite (Vitiben)	Not Regulated
Calcium Hydroxide /Hydrated Lime FCC (Vitacal)	Not Regulated
Heavy Duty Steam Cleaner #1	Not Regulated
Healthy Hooves	Not Regulated
Kasil #1, Kasil #6 and Kasil 2135	Not Regulated
Aluminum Chlorohydrate Solution	Not Regulated
Belsperse 161	Not Regulated
Brennsperse (1005 and 4006)	Not Regulated
Brennsperse 4041	Not Regulated
Briquest (301-30SH/301-50A)	Not Regulated
Calfax DB-45	Not Regulated
Calsoft L-40 and L-60	Not Regulated
Calsuds CD 6	Not Regulated
Capcure 3830-81	Not Regulated
CED 1003	Not Regulated
CED 1303	Not Regulated
Chlor-Aid 20	Not Regulated
Chlor-Aid WA	Not Regulated
Ethylene Glycol (Jeffcool E-100)	Not Regulated
Glycol Ether DB	Not Regulated
Glycol Ether DE	Not Regulated
Glycol Ether DPM	Not Regulated
Glycol Ether DPM Acetate	Not Regulated
Glycol Ether DPNB	Not Regulated

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Healthy Hooves RTU	Not Regulated
1-Hydroxyethylidene-1, 1-Dipohosphonic Acid (HEDP)	Not Regulated
Hexane	Not Regulated
Hexylene Glycol	Not Regulated
Igepal CA-620	Not Regulated
Iodafect Iodine Sanitizer	Not Regulated
N Butyl Alcohol	Not Regulated
Propanol	Not Regulated
Namet	Not Regulated
2-Phosphonobutane -1,2,4-Tricarboxylic Acid (PBTC)	Not Regulated
para-Chlorobenzotrifluoride (PCBTF)	Not Regulated
Poly-Solv EM	Not Regulated
Surfactant OP 100	Not Regulated
Surfonic L 24-12	Not Regulated
Surfonic LF 17	Not Regulated
Tergitol L-61	Not Regulated
Tergitol 15-S-9	Not Regulated
Tomadol 25-12	Not Regulated
Tomadol 25-9	Not Regulated
Tomadol 900/91-6	Not Regulated
Tomadol 1200	Not Regulated
Tomamine Acid Foamer	Not Regulated
Tomamine Alkali Surfactant	Not Regulated
Tomanine Emulsifier Four	Not Regulated
Triton CG-110	Not Regulated
Triton DF-16	Not Regulated
Triton H-66	Not Regulated
Calcium Chloride	Not Regulated
Calcium Propionate	Not Regulated
Isocyanuric Acid	Not Regulated
Sodium Benzoate	Not Regulated

COMMON NAME/ CHEMICAL NAME	DOT HAZARD CLASS
Ascorbic Acid	Not Regulated
Celvol 205S	Not Regulated
Calcium Chloride Solution	Not Regulated
Activated Carbon	Not Regulated

Fire Code Hazard Class Chemicals

COMMON NAME/ CHEMICAL NAME	Tank ID		FIRE CODE HAZARD CLASSES	TANK SIZE		Tank Material	MAXIMUM DAILY AMOUNT (lbs)
sodium hypochlorite 12.55	S-10	Corrosive	8, UN1824, PG II Corrosive Irritant	8300 gallon	B	Poly	75,000
sodium hypochlorite 12.55	S-11	Corrosive	8, UN1824, PG II Corrosive Irritant	6200 gallon	B	Poly	56,000
Citric Acid 40-50% Solution	FS-1	Irritant	Irritant	5,500 gallon	B	Poly	50,800
Citric Acid 40-50% Solution	FS-2	Irritant	Irritant	5,500 gallon	B	Poly	50,800
Citric Acid 40-50% Solution	FB-1	Irritant	Irritant	6,000 gallon	B	Poly	50,800
Citric Acid 40-50% Solution	FB-2	Irritant	Irritant	6,000 gallon	B	Poly	50,800
Sodium Hydroxide, Solution 10-30%	S-9	Corrosive	8, UN1824, PG II Corrosive Irritant	6,200 gallon	B	Poly	17,140
Hydrochloric Acid	S-1	Corrosive	8,UN1789	28,000 gallon	B	FRP	243,432
Potassium Hydroxide 50%	S-7	Corrosive	8,UN1814	25,000 gallon	B	Steel	284,850
Sodium Hydroxide 50%	S-8	Corrosive	8,UN1824	25,000 gallon	B	Steel	286,650
Sulfuric Acid 93%	S-2	Corrosive WR	8,UN1830	20,000 gallon	B	Lined Steel	275,940
Nitric Acid	S-3	Corrosive	8,UN2505	11,000 gallon	B	Stainless Steel	115,434

H-3

COMMON NAME/ CHEMICAL NAME	Room	FIRE CODE HAZARD CLASSES	LARGEST CONTAINER		AVERAGE DAILY AMOUNT	UNITS
Soltrol 170 Isoparaffin	Combustible	173.150 (F) (2) Combustible Liquid Class III Irritant	55 gallon	P	183	Gallons
Carbowax Series (PEG 200,400)	Combustible	Combustible Liquid Class III Irritant	515 lbs	P	3,991	Pounds
Isoparaffin 170; LPA-210 Solvent	Combustible	NOT DOT REGULATED PER 49 CFR 173.150 (F) Combustible Liquid	55 gal	P	344	Gallons
Primary Amyl Acetate	Combustible	Combustible Liquid	55 gallon	P	0	Gallons
Diethylene Glycol	Combustible	Combustible Liquid Class II Irritant Carcinogen	55 gallon	P	0	Gallons
DEEA	Combustible	Combustible Liquid Class II Irritant Carcinogen	55 gallon	P	78	Gallons
DMSO	Combustible	Combustible Liquid Class II Irritant Carcinogen	55 gallon	P	1,500	Gallons
Paraffin Wax, Wax IGI, BP, All Grades	Combustible	Combustible Class III Irritant	2,200 lbs	P	0	Pounds
Calsoft F-90 and F-90L	Combustible	Combustible Class III Irritant	200 lbs	P	877	Pounds
Purolite PFC-100H	Combustible	Combustible Liquid	255 lbs	P	9	Pounds
Aromatic 100 Solvent	Combustible	COMBUSTIBLE LIQUID, UN1268	275 gallon	P	689	Gallons
Silicone XEO, 20S, 30S, 10S, (Series)	Combustible	Combustible Liquid Class III Irritant	330 gallon	P	1,361	Gallons
I-Sil 360E, 350, 391, 335 EFG	Combustible	Combustible Liquid Class III Irritant	330 gallon	P	181	Gallons
Surfactant NP-9, Surfonic N-95, Tergitol NP-9	Combustible	Combustible Liquid Class III Irritant Carcinogen	330 gallon	P	1,014	Gallons
Propylene Glycol, Technical, USP and Inhibited	Combustible	Combustible Liquid Class III Irritant	330 gallon	P	405	Gallons
Paint Thinner	Combustible		5 gallon	P	0	Gallons
VM&P Naphtha	Combustible	Combustible Liquid Class II Irritant Other Hazord	55 gallon	P	215	Gallons
Citrus Distillate, D-Limonene	Combustible	Combustible Liquid Class II Irritant	55 gallon	P	1,128	Gallons
Mineral Spirits, Mineral Spirits Odorless, Rule 66	Combustible	Combustible Liquid Class II Irritant Other Health Hazard	55 gallon	P	139	Gallons
Sylfat FA-1, Acintol FA-1	Combustible	Combustible Liquid Class III Irritant	55 gallon	P	554	Gallons
Sylfat FA-2, Acintol FA-2	Combustible	Combustible Liquid Class III Irritant	55 gallon	P	203	Gallons
Pluronic (All Grades) L-61, L-62	Combustible	Combustible Liquid Class III Irritant Carcinogen	55 gallon	P	359	Gallons

Calfoam ES 603; ES 303; ES 702; SLS -30	Combustible	Combustible Liquid Class III Irritant	55 gallon	P	287	Gallons
Glycerine 99.5%	Combustible	Combustible Liquid Class III Irritant	55 gallon	P	780	Gallons
Glycol Ether EB	Combustible	Combustible Liquid Class III Irritant	55 gallon	P	2,967	Gallons
Foamaster NDW	Combustible	Combustible Liquid Class III Irritant Carcinogen	55 gallon	P	53	Gallons
Foamaster NXZ & Foamaster VF & VL	Combustible	Combustible Liquid Class III Irritant Carcinogen	55 gallon	P	154	Gallons
MEA 85-99%	Combustible	Combustible Liquid Class III-B	55 gallon	P	1,143	Gallons
Cyclohexanone	Combustible	COMBUSTIBLE LIQUID NOT REGULATED PER 49 CFR 173.150 (F) (2) Flammable Class 1-B Corrosive	55 gallon	P	55	Gallons
Glycol Ether PNB	Combustible	COMBUSTIBLE LIQUID, NA1993, PG III Irritant	55 gallon	P	136	Gallons
Alfonic 810-6	Combustible	IIIB Combustible liquid	55 gallon	P	78	Gallons
Dimethyl Sulfone Crystal	Combustible	Combustible Liquid Class II Irritant Carcinogen	55 lb	P	74,175	Pounds

COMMON NAME/ CHEMICAL NAME	H-4 Room	FIRE CODE HAZARD CLASSES	LARGEST CONTAINER		AVERAGE DAILY AMOUNT	UNITS
Phosphorus Acid Crystals	Corrosive	Corrosive	1,102 lbs	P	259,351	Pounds
Cupric Chloride Dihydrate	Corrosive	8, UN2802, PG III Corrosive Irritant	200 lbs	P	0	Pounds
Dober Super Reduce (Super Reduce Black)	Corrosive	8, UN1778, PG II Corrosive Irritant	275 gallon	P	141	Gallons
Zinc Chloride Solution	Corrosive	8, UN1840, PG III Corrosive Irritant	275 gallon	P	56	Gallons
ATI-NAP50	Corrosive	8, UN3264, PG II	275 gallon	P	55	Gallons
LA Chem Floc	Corrosive	8, UN3264, PG III Irritant	275 gallon	P	825	Gallons
CN Acid 100	Corrosive	8, UN3264, PG II Corrosive Irritant	275 gallon	P	2,186	Pounds
Ferric Nitrate Solution	Corrosive	8, UN3264, PG II Corrosive	3200 lbs	P	32,000	Pounds
Turbolizer	Corrosive	8, UN1778, PG II Corrosive Liquid	330 gallon	P	330	Gallons
Hydrochloric Acid 4%	Corrosive	8, UN1789, PG II Corrosive Irritant	330 gallon	P	111	Gallons
Hydrochloric Acid 15%	Corrosive	8, UN1789, PG II Corrosive Irritant	330 gallon	P	4,686	Gallons
Phosphoric Acid 25-75%	Corrosive	8, UN1805, PG III Corrosive Irritant	330 gallon	P	4,694	Gallons
Acetic Acid 80%	Corrosive	8, UN2790, PG II Corrosive	330 gallon	P	3,234	Gallons
Protek 301	Corrosive	8, UN3264, PG III Corrosive	330 gallon	P	936	Gallons
Aluminum Sulfate 50% Solution	Corrosive	8, UN3264, PG III Corrosive Irritant	330 gallon	P	3,046	Gallons
DM Kosticlor	Corrosive	8, UN3266, PG II Corrosive	330 gallon	P	330	Gallons
Propionic Acid	Corrosive		330 gallon	P	746	Gallons
Ferric Sulfate 50-60% Solution	Corrosive	Corrosive Irritant	330 gallon	P	6,552	Pounds
Sodium Bisulfate	Corrosive	Corrosive	400 lb	P	600	Pounds
Belcor 593	Corrosive	Corrosive Irritant	44 lbs	P	0	Pounds
Brennfloc (92212 and 92242)	Corrosive	8, UN3264, PG III	450 lb	P	0	Gallons
Zinc Chloride	Corrosive	8, UN2331, PG III Irritant	450 lb	P	3,150	Pounds
Formaldehyde 37/14%	Corrosive	8, UN2209, PG III Combustible Liquid Class III Carcinogen	480 lbs	P	8,090	Pounds
Ferric Sulfate	Corrosive	Corrosive Irritant	50 lb	P	2,500	Pounds
Ammonium Bifluoride	Corrosive	8, UN1727, PG II Corrosive Irritant	50 lbs	P	299,752	Pounds
Sulfamic Acid	Corrosive	8, UN2967, PG III Corrosive Irritant	50 lbs	P	1,328	Pounds

LACCO Stone AX 150	Corrosive	8, UN1789, PG II Corrosive Irritant	55 gal	P	281	Gallons
Rhodafac RA-600	Corrosive	8, UN3265, PG III Corrosive Liquid	55 gal	P	0	Gallons
Acetic Acid Glacial	Corrosive	8, (3) UN2789 PG II Corrosive/Combustible Liquid Class II	55 gallon	P	169	Gallons
Formic Acid 90-95%	Corrosive	8, (3), UN1779, PG II Combustible Liquid Class II Corrosive	55 gallon	P	25,212	Pounds
BTC 2125M	Corrosive	8, (3), UN2920, PG II Corrosive Irritant	55 gallon	P	173	Gallons
ATI-PFS and ATI-PFS II	Corrosive	8, UN1760, PG III	55 gallon	P	384	Gallons
Hydrochloric Acid 20%	Corrosive	8, UN1789, PG II Corrosive Irritant	55 gallon	P	215	Gallons
Hydrochloric Acid 30-32% Inhibited	Corrosive	8, UN1789, PG II Corrosive Other Health Hazard	55 gallon	P	736	Gallons
Aluminum Chloride Solution	Corrosive	8, UN2581, PG III Corrosive	55 gallon	P	205	Gallons
DDBSA	Corrosive	8, UN2586, PG III Corrosive Irritant	55 gallon	P	203	Gallons
Acetic Acid 20%	Corrosive	8, UN2790, PG III Corrosive	55 gallon	P	207	Gallons
ATMP (all types)	Corrosive	8, UN3262, PG III	55 gallon	P	9,046	Gallons
Cat-Flock KL-10	Corrosive	8, UN3264, PG III Irritant	55 gallon	P	175	Gallons
Hydroxyacetic acid 70%	Corrosive	8, UN3265, PG II Corrosive	55 gallon	P	77	Gallons
Bio-Soft-S-101	Corrosive	8, UN3265, PG II Corrosive Irritant	55 gallon	P	53	Gallons
Belclene 200, PMA	Corrosive	8, UN3265, PG III Corrosive Irritant	55 gallon	P	108	Gallons
Belclene 283	Corrosive	8, UN3265, PG III Corrosive Irritant	55 gallon	P	104	Gallons
Belclene 400	Corrosive	8, UN3265, PG III Corrosive Irritant	55 gallon	P	172	Gallons
Belclene 660, HEDP	Corrosive	8, UN3265, PG III Corrosive Irritant	55 gallon	P	0	Gallons
Belcor 575	Corrosive	8, UN3265, PG III Corrosive Irritant	55 gallon	P	85	Gallons
HPMA	Corrosive	8, UN3265, PG III Corrosive Irritant	55 gallon	P	145	Gallons
Briquest ADPA - 60AW	Corrosive	8, UN3265, PG III Irritant	55 gallon	P	53	Gallons
Calsoft LAS-99	Corrosive	Corrosive	55 gallon	P	511	Gallons
Corrkleen AC 50	Corrosive	Corrosive Irritant	55 gallon	P	55	Gallons
Ferric Chloride	Corrosive	Corrosive Irritant	55 gallon	P	2,070	Gallons
Oxalic Acid	Corrosive	Corrosive Toxic	55 lbs	P	162	Pounds
Erythorbic Acid	Corrosive	Corrosive Irritant	55 lbs	P	468	Pounds

Hydrochloric Acid 30-32%	Corrosive	8, UN1789, PG II Corrosive Other Health Hazard	550 gallon	P	4,375	Gallons
Sodium Bisulfite Solution 10-38% (SBS)	Corrosive	Corrosive Irritant Other Health Hazard	550 gallon	P	2,728	Gallons
Nitric Acid 67-71%	Corrosive	8, UN2031, PG II Corrosive Oxidizer Class 1	600 lbs	P	6,518	Pounds
Phosphoric Acid 85%	Corrosive	Corrosive Irritant	85 gallon	P	154	Gallons
EDTA (Versene)	Corrosive	Corrosive Irritant	2000 lbs	P	114,238	Pounds
Empilan KR 6	Corrosive	Corrosive Irritant	2062 lbs	P	249	Gallons
CorrKleen FC 50	Corrosive	Corrosive Irritant	250 gallon	P	87	Gallons
Tart Clean P40	Corrosive	8, UN1814, PG II Corrosive	275 gallon	P	550	Gallons
LACCO CIP #550	Corrosive	Corrosive	275 gallon	P	273	Gallons
CorrKleen HC 430	Corrosive	Corrosive Irritant	275 gallon	P	985	Gallons
LACCO Chlorofoam 600	Corrosive	8, UN3266, PG II Corrosive Irritant	330 gallon	P	1,303	Gallons
Peeler Blend	Corrosive	8, UN3266, PG II Corrosive Liquid	330 gallon	P	3,863	Gallons
Tetrasodium EDTA 39%	Corrosive	Corrosive Irritant	330 gallon	P	2,174	Gallons
Potassium Hydroxide 45-50% Liquid	Corrosive	Corrosive Irritant	330 gallon	P	2,102	Gallons
Tartrate Cleaner	Corrosive	8, UN1823, PG II	500 lbs	P	6,992	Pounds
Hot Tank Cleaner #8 Low Foam	Corrosive	8, UN1823, PG II Corrosive Irritant	500 lbs	P	1,000	Pounds
Caustic Soda Flake/Beads	Corrosive	8, UN1824, PG II Corrosive Irritant	500 lbs	P	19,793	Pounds
Sodium tolyltriazole 50%	Corrosive	8, UN3267, PG II Irritant	55 gal	P	106	Gallons
Epon 828/Dow DER 331-OT	Corrosive	Corrosive Irritant	55 gal	P	289	Gallons
Rhodapon BOS	Corrosive	Corrosive Liquid	55 gal	P	440	Gallons
Ethylenediamine	Corrosive	8, (3), UN1604, PG II Corrosive, flammable, irritant	55 gal	P	159	Pounds
Cyclohexylamine	Corrosive	8, (3), UN2357, PG II Flammable Class 1-B Corrosive	55 gallon	P	54	Gallons
Proxel GL	Corrosive	8, UN1719, PG II Corrosive	55 gallon	P	0	Gallons

APC 500 K	Corrosive	8, UN1813, PG II Corrosive Irritant	55 gallon	P	274	Gallons
Sunkist KOH Blend	Corrosive	8, UN1814, PG II Corrosive Irritant	55 gallon	P	446	Gallons
Biokleen ST	Corrosive	8, UN1814, PG II Corrosive Irritant	55 gallon	P	187	Gallons
APC Alkaline Cleaner	Corrosive	8, UN1823, PG II Corrosive	55 gallon	P	0	Gallons
Caustic Degreaser	Corrosive	8, UN1823, PG II Corrosive	55 gallon	P	0	Gallons
Sodium Chlorite Solution 7.5-31% (Akta-Klor, Adox 750/8125)	Corrosive	8, UN1908, PG II Oxidizer Class 2 Irritant	55 gallon	P	5,445	Gallons
Belclene 515	Corrosive	8, UN3265, PG III Corrosive Irritant	55 gallon	P	0	Gallons
LACCO Foam HD 650	Corrosive	8, UN3266, PG II Corrosive Irritant	55 gallon	P	0	Gallons
Tetrapotassium Pyrophosphate, TKPP 60%	Corrosive	Corrosive Irritant	55 gallon	P	0	Gallons
Dowfax 3B2	Corrosive	Corrosive Irritant	55 gallon	P	0	Gallons
LACCO Foam Solv #800	Corrosive	Corrosive Irritant	55 gallon	P	185	Gallons
CorrKleen FC 500	Corrosive	Corrosive Irritant	55 gallon	P	55	Gallons
Organosilane A302	Corrosive	8, UN3267, PG II Corrosive Toxic	55 gallon	P	0	Pounds
ACL-56	Corrosive	Corrosive	55 gallon	P	0	Pounds
Aqua Ammonia	Corrosive	Corrosive Toxic Irritant	55 gals	P	165	Gallons
Potassium Hydroxide Flake, Walnut	Corrosive	8, UN1813, PG II Corrosive Irritant	55 lbs	P	17,688	Pounds
Sodium Metasilicate (anyhydrous and pentahydrate)	Corrosive	8, UN3262 PGII Irritant	55 lbs	P	14,286	Pounds
Doberalk	Corrosive	8, UN1824, PG II Corrosive Irritant	550 gallon	P	0	Gallons
E-Max Alkali	Corrosive	8, UN1824, PG II Corrosive Irritant	550 gallon	P	1,951	Gallons
E-Max Exact	Corrosive	8, UN3266, PG III Corrosive Irritant	550 gallon	P	485	Gallons
Sodium Hydroxide, Solution 50%	Corrosive	Corrosive Irritant	550 gallon	P	3,569	Gallons
E-Max Precise	Corrosive	Corrosive Irritant	550 gallon	P	364	Gallons
Ammonium Hydroxide	Corrosive	8UN2672	Totes	P		pounds

COMMON NAME/ CHEMICAL NAME	H-4 Room	FIRE CODE HAZARD CLASSES	LARGEST CONTAINER		AVERAGE DAILY AMOUNT	UNITS
Sulfuric Acid 92-98% (66Be)	Corrosive WR	8, UN2796, PG II Corrosive Water Reactive Class 1	4,600 lbs	P	76,983	Pounds
Sulfuric Acid 20-92%	Corrosive WR	8, UN2796, PG II Corrosive Water Reactive Class 1	6,050 lbs	P	15,714	Pounds

COMMON NAME/ CHEMICAL NAME	Flam Tote Area	FIRE CODE HAZARD CLASSES	LARGEST CONTAINER		AVERAGE DAILY AMOUNT	UNITS
Methanol	Flammable	3, UN1230, PG II Flammable liquid Class 1-A Irritant	275 gallon	P	2,168	Gallons
Dimethylformamide	Flammable	3, UN2265, PG II Combustible Liquid Class II Irritant Carcinogen	275 gallon	P	765	Gallons
Acetaldehyde 50% in Ethanol	Flammable	3, UN1993, PG II Flammable Liquid	30 gallon	P	55	Gallons
IPA	Flammable	3, UN1993, PG II Flammable Liquid Class 1-B Irritant	330 gallon	P	2,184	Gallons
Acetone	Flammable	3, UN1090, PG II Flammable Liquid 1-B	5 gallon	P	27	Gallons
1,4 Dioxane	Flammable	3, UN1165, PG II Irritant Other Health Hazard	55 gal	P	946	Gallons
Isopar G; Isopar M	Flammable	3, UN1268, PG III/ ISOPAR M UN1268, PG II Combustible Liquid	55 gal	P	3,230	Gallons
Soco Wash Solvent	Flammable	3, UN1993, PG II Flammable Liquid	55 gal	P	440	Gallons
Cortron RA-501	Flammable	3, (6.1), UN1992, PG II Flammable Liquid	55 gallon	P	54	Gallons
Acetone	Flammable	3, UN1090, PG II Flammable Liquid 1-B	55 gallon	P	821	Gallons
Accosoft 808	Flammable	3, UN1219, PG II Flammable Liquid	55 gallon	P	183	Gallons
MEK	Flammable	3, UN1224, PG II Flammable Liquid Class 1-B Irritant	55 gallon	P	93	Gallons
MIBK	Flammable	3, UN1224, PG II Flammable Liquid Class 1-B Irritant	55 gallon	P	101	Gallons
Toluene	Flammable	3, UN1294, PG II Flammable Liquid 1-B Irritant Carcinogen	55 gallon	P	52	Gallons
Xylene	Flammable	3, UN1307, PG III Flammable Liquid Class 1-C Other Health Hazard Carcinogen	55 gallon	P	712	Gallons
Glycol Ether PTB	Flammable	3, UN1993, PG III Combustible Liquid Class II Irritant	55 gallon	P	0	Gallons
Accosoft 501	Flammable	3, UN1993, PG III Flammable Liquid	55 gallon	P	183	Gallons
Aerofroth 65 Frother	Flammable	Flammable Liquid 1-B	55 gallon	P	212	Gallons
Denatured Alcohol, Synasol (all grades)	Flammable	Flammable Liquid 1-B Irritant	55 gallon	P	54	Gallons

Mineral Spirits	Flammable	Flammable Liquid Class 1-B Irritant	55 gallon	P	276	Gallons
Hexane	Flammable		55 gallon	P	450	Gallons
N Butyl Alcohol	Flammable		55 gallon	P	110	Gallons
Propanol	Flammable		55 gallon	P	171	Gallons
Alcalase	Flammable	Flammable Liquid 1-B	55 gallon	P	405	Pounds
Propane	Flammable	Flammable Liquid Class 1-A	8 gal	P	160	Gallons

COMMON NAME/ CHEMICAL NAME	S-1 / F-1 Room	FIRE CODE HAZARD CLASSES	LARGEST CONTAINER		AVERAGE DAILY AMOUNT	UNITS
Stepanol WA-100	Irritant		100 lb	P	800	Pounds
Calcium Acetate	Irritant		100 lb	P	0	Pounds
Zinc Oxide (all grades)	Irritant	Irritant	1000 lbs	P	42,500	Pounds
Citric Acid	Irritant	Irritant	2,000 lbs	P	785,081	Pounds
Diammonium phosphite	Irritant	Irritant	2,000 lbs	P	88,002	Pounds
Manganese Carbonate	Irritant	Irritant	2,000 lbs	P	0	Pounds
Manganese Sulfate	Irritant	Irritant	2,204 lbs	P	4,417	Pounds
Sodium Sulfate	Irritant		2,400 lb	P	20,263	Pounds
Sodium Molybdate	Irritant	Irritant	200 lbs	P	0	Pounds
Ammonium Molybdate	Irritant		200 lbs	P	0	Pounds
Sodium Chloride (Salt all types)	Irritant	Irritant	2000 lb	P	88,575	Pounds
Boric Acid	Irritant		2000 lb	P	42,194	Pounds
Monopotassium phosphite	Irritant	Irritant	2200 lb	P	36,819	Pounds
Trisodium Phosphate Chlorinated 10% Solution	Irritant	Irritant	2400 lbs	P	3,095	Pounds
Calfax 10L 45	Irritant		2500 lb	P	590	Gallons
		9, UN3082, PG III Combustible				
SB Surfactant OP-10	Irritant	Liquid	275 gallon	P	539	Gallons
		Flammable Liquid Class III-A				
LACCO Quat #10	Irritant	Irritant Other Health Hazard	275 gallon	P	390	Gallons
Aquapure 3655	Irritant	Irritant	275 gallon	P	1,310	Gallons
Aquatreat AR-900A	Irritant	Irritant	275 gallon	P	369	Gallons
Praestol K148L	Irritant	Irritant	275 gallon	P	699	Gallons
Sodium Hexametaphosphate 35%	Irritant	Irritant	275 gallon	P	0	Gallons
SXS-40 Pilot	Irritant	Irritant	275 gallon	P	1,123	Gallons
Lactic Acid	Irritant	Irritant	275 gallon	P	1,446	Gallons
Calsoft AOS-40	Irritant		275 gallon	P	94	Gallons
CC 2000	Irritant		275 gallon	P	268	Gallons
CC 2040	Irritant		275 gallon	P	705	Gallons
CIP 560	Irritant		275 gallon	P	275	Gallons
Trisodium Phosphate Chlorinated	Irritant	Irritant	286 lbs	P	3,095	Pounds
Dissolvine E-39, Keelon 100, Sesquestrene 30A, Dissolve 100S	Irritant	2900 lbs	2900 lbs	P	0	Gallons

Potassium Sorbate Solution	Irritant		Irritant	3100 lbs	P	1,024	Gallons
Aquapure 3628	Irritant		Irritant	330 gallon	P	1,317	Gallons
Bannish and Bannish II	Irritant		Irritant	330 gallon	P	493	Gallons
Sodium Bromide 40% (Enviro Brom L40)	Irritant		Irritant	330 gallon	P	0	Gallons
Sodium Gluconate Solution 30-60%	Irritant		Irritant	330 gallon	P	231	Gallons
Sodium Silicate (All Grades) N,40, 41,RU, D, E	Irritant		Irritant	330 gallon	P	3,440	Gallons
Terracair DEF 32.5%	Irritant		Irritant	330 gallon	P	2,125	Gallons
Dober Detergent #27 Revised	Irritant		Irritant Carcinogen	330 gallon	P	0	Gallons
Morwet EFW Powder	Irritant		Irritant	40 lb	P	1,200	Pounds
Sodium Sulfite (anhydrous, catalyzed, photo)	Irritant		Irritant	400 lbs	P	2,517	Pounds
Tersperse 2020	Irritant		Irritant	44 lbs	P	0	Pounds
Triton CF87	Irritant			480 lbs	P	718	Pounds
Polysorbate (T Maz, 20, 20K, 60K, 80K)	Irritant			490 lbs	P	785	Gallons
A-Tite	Irritant		Irritant Other Health Hazard	5 gallon	P	68	Gallons
Indole 3 Butyric acid	Irritant			5 gallon	P	0	Gallons
MAP	Irritant		Irritant	50 lb	P	350	Pounds
MKPP	Irritant		Irritant	50 lb	P	44,973	Pounds
Sea Mud	Irritant		Irritant	50 lb	P	12,854	Pounds
Sodium Aluminum Phosphate	Irritant			50 lb	P	4,200	Pounds
Calcium Stearate	Irritant			50 lb	P	1,047	Pounds
Sodium Acid Pyrophosphate	Irritant			50 lb	P	22,541	Pounds
Sodium Bicarbonate	Irritant			50 lb	P	114,536	Pounds
Calcium Phosphate Tribasic (Tricalcium Phosphate)	Irritant			50 lb	P	74,174	Pounds
Natrosol 250 MR; Natros Hi-Vis Polymer	Irritant		Fire	50 lb	P	10,192	Pounds
Monocalcium Phosphate	Irritant		Irritant	50 lb	P	2,000	Pounds
MSG	Irritant		Irritant	50 lb	P	2,315	Pounds
Floor Dry/Floor Sweep	Irritant		Irritant	50 lb	P	2000	Pounds
Calcium Carbonate/Vicron 15-15	Irritant			50 lb	P	4,425	Pounds
Sulfur Laccofine	Irritant		9, NA1350, PG III Irritant	50 lbs	P	311	Pounds

Copper Sulfate, Snow, Medium, Powder, All Grades	Irritant	9, UN3077, PG III	Irritant	50 lbs	P	4,875	Pounds
Alum Granular	Irritant		Irritant	50 lbs	P	4,301	Pounds
Ammonium Sulfate	Irritant		Irritant	50 lbs	P	39,477	Pounds
Dissolvine Z-S	Irritant		Irritant	50 lbs	P	2,410	Pounds
Magnesium Chloride	Irritant		Irritant	50 lbs	P	0	Pounds
Magnesium Sulfate, Epsom Salt	Irritant		Irritant	50 lbs	P	582	Pounds
Malic Acid	Irritant		Irritant	50 lbs	P	5,001	Pounds
Petro Powder (AA, BA)	Irritant		Irritant	50 lbs	P	673	Pounds
Potassium Sorbate	Irritant		Irritant	50 lbs	P	2,672	Pounds
Soda Ash	Irritant		Irritant	50 lbs	P	79,339	Pounds
Sodium Gluconate	Irritant		Irritant	50 lbs	P	2,618	Pounds
Sodium Sesquicarbonate	Irritant		Irritant	50 lbs	P	838	Pounds
Titanium Dioxide (All Grades)	Irritant		Irritant	50 lbs	P	5,015	Pounds
Urea	Irritant		Irritant	50 lbs	P	2,338	Pounds
Zinc Sulfate (all grades)	Irritant		Irritant	50 lbs	P	4,017	Pounds
Magnesium Nitrate Hexahydrate	Irritant		Irritant	50 lbs	P	2,000	Pounds
Alutern TG-2	Irritant			50 lbs	P	40,834	Pounds
Ammonium bicarbonate	Irritant			50 lbs	P	133	Pounds
Anilox Roll Cleaning Formula	Irritant			50 lbs	P	0	Pounds
Aqualon CMC (all types)	Irritant			50 lbs	P	15,512	Pounds
Polybor	Irritant			50 lbs	P	708	Pounds
Diammonium Phosphate	Irritant		Irritant	50 lbs	P	2,764	Pounds
Disodium Phosphate	Irritant		Irritant	50 lbs	P	4,654	Pounds
Dicalite, Celatom, Dicaflock Series (All Grades)	Irritant	Other Health Hazard		50 lbs	P	46,217	Pounds
Bentonite (Vitiben)	Irritant			50 lbs	P	20,233	Pounds
Calcium Hydroxide /Hydrated Lime FCC (Vitacal)	Irritant			50 lbs	P	31,399	Pounds
Ferrous Sulfate (Heptahydrate, Monohydrate)	Irritant	9, UN3077, PG III	Irritant	50 lbs	P	8,148	Pounds
Flavourzyme 1000 L.K	Irritant		Irritant	50 lbs	P	651	Pounds
Heavy Duty Steam Cleaner #1	Irritant			500 lbs	P	1,000	Pounds
Healthy Hooves	Irritant			539 lb	P	1,035	Gallons
Conqor 404	Irritant		Irritant	55 gal	P	7,185	Gallons
Therminol 55	Irritant		Irritant	55 gal	P	660	Gallons

2-Ethylhexanol	Irritant	Irritant Combustible Liquid	55 gal	P	266	Gallons
Kasil #1, Kasil #6 and Kasil 2135	Irritant		55 gal	P	477	Gallons
Triton X-100: Triton X-45	Irritant	9 UN3082, PG III	55 gallon	P	55	Gallons
Calamide (C and CW-100)	Irritant	9, UN3082, PG III	55 gallon	P	56	Gallons
Alcosperse 459-N	Irritant	Irritant	55 gallon	P	167	Gallons
Alcosperse 602-N	Irritant	Irritant	55 gallon	P	0	Gallons
Aqua Suds	Irritant	Irritant	55 gallon	P	0	Gallons
Aquatreat AR 545	Irritant	Irritant	55 gallon	P	48	Gallons
Calimulse PRS	Irritant	Irritant	55 gallon	P	53	Gallons
Metal Grabber	Irritant	Irritant	55 gallon	P	0	Gallons
Methyl Salicylate	Irritant	Irritant	55 gallon	P	660	Gallons
Neo Solutions (NS Series)	Irritant	Irritant	55 gallon	P	61	Gallons
Petro Liquid (ULF, AA, BA, 22)	Irritant	Irritant	55 gallon	P	132	Gallons
Plurafac RA 40	Irritant	Irritant	55 gallon	P	110	Gallons
Plurafac SLF-180	Irritant	Irritant	55 gallon	P	213	Gallons
Praestol 186 K	Irritant	Irritant	55 gallon	P	59	Gallons
Spindkleen	Irritant	Irritant	55 gallon	P	469	Gallons
Surfactant NP-12, Surfonic N-120	Irritant	Irritant	55 gallon	P	289	Gallons
Triethanolamine 85-99%	Irritant	Irritant	55 gallon	P	179	Gallons
Food Tech Additive 700	Irritant	Irritant	55 gallon	P	416	Gallons
Gluconic Acid	Irritant	Irritant	55 gallon	P	102	Gallons
Hamposyl L-30	Irritant	Irritant	55 gallon	P	93	Gallons
Naxonate 45SC	Irritant	Irritant	55 gallon	P	102	Gallons
Praestol A3050L	Irritant	Irritant	55 gallon	P	216	Gallons
DEA	Irritant	Irritant Carcinogen	55 gallon	P	0	Gallons
Copper Sulfate Solution 25%	Irritant	Other Health Hazard	55 gallon	P	2,613	Gallons
Aluminum Chlorohydrate Solution	Irritant		55 gallon	P	0	Gallons
Belsperse 161	Irritant		55 gallon	P	50	Gallons
Brennsperse (1005 and 4006)	Irritant		55 gallon	P	491	Gallons
Brennsperse 4041	Irritant		55 gallon	P	57	Gallons
Briquest (301-30SH/301-50A)	Irritant		55 gallon	P	0	Gallons
Calfax DB-45	Irritant		55 gallon	P	52	Gallons
Calsoft L-40 and L-60	Irritant		55 gallon	P	52	Gallons
Calsuds CD 6	Irritant		55 gallon	P	82	Gallons
Capcure 3830-81	Irritant		55 gallon	P	0	Gallons
CED 1003	Irritant		55 gallon	P	221	Gallons

CED 1303	Irritant		55 gallon	P	0	Gallons
Chlor-Aid 20	Irritant		55 gallon	P	278	Gallons
Chlor-Aid WA	Irritant		55 gallon	P	231	Gallons
Ethylene Glycol (Jeffcool E-100)	Irritant		55 gallon	P	139	Gallons
Glycol Ether DB	Irritant		55 gallon	P	119	Gallons
Glycol Ether DE	Irritant		55 gallon	P	0	Gallons
Glycol Ether DPM	Irritant		55 gallon	P	127	Gallons
Glycol Ether DPM Acetate	Irritant		55 gallon	P	575	Gallons
Glycol Ether DPNB	Irritant		55 gallon	P	54	Gallons
Healthy Hooves RTU	Irritant		55 gallon	P	0	Gallons
HEDP	Irritant		55 gallon	P	212	Gallons
Hexylene Glycol	Irritant		55 gallon	P	665	Gallons
Igepal CA-620	Irritant		55 gallon	P	110	Gallons
Iodafect Iodine Sanitizer	Irritant		55 gallon	P	10	Gallons
Namet	Irritant		55 gallon	P	156	Gallons
PBTC	Irritant		55 gallon	P	295	Gallons
PCBTF	Irritant		55 gallon	P	50	Gallons
Poly-Solv EM	Irritant		55 gallon	P	54	Gallons
Surfactant OP 100	Irritant		55 gallon	P	0	Gallons
Surfonic L 24-12	Irritant		55 gallon	P	53	Gallons
Surfonic LF 17	Irritant		55 gallon	P	96	Gallons
Tergitol L-61	Irritant		55 gallon	P	54	Gallons
Tergitol 15-S-9	Irritant		55 gallon	P	165	Gallons
Tomadol 25-12	Irritant		55 gallon	P	153	Gallons
Tomadol 25-9	Irritant		55 gallon	P	187	Gallons
Tomadol 900/91-6	Irritant		55 gallon	P	143	Gallons
Tomadol 1200	Irritant		55 gallon	P	0	Gallons
Tomamine Acid Foamer	Irritant		55 gallon	P	68	Gallons
Tomamine Alkali Surfactant	Irritant		55 gallon	P	55	Gallons
Tomanine Emulsifier Four	Irritant		55 gallon	P	56	Gallons
Triton CG-110	Irritant		55 gallon	P	0	Gallons
Triton DF-16	Irritant		55 gallon	P	0	Gallons
Triton H-66	Irritant		55 gallon	P	0	Gallons
Sodium Citrate	Irritant	Irritant	55 lb	P	8,724	Pounds
Celvol 205S Polyvinyl Alcohol	Irritant	Irritant	55 lb	P	948	Pounds
Sodium Bromide	Irritant	Irritant	55 lb	P	0	Pounds

Calcium Chloride	Irritant		55 lb	P	58,919	Pounds
Calcium Propionate	Irritant		55 lb	P	0	Pounds
Isocyanuric Acid	Irritant		55 lb	P	0	Pounds
Sodium Benzoate	Irritant		55 lb	P	5,506	Pounds
Ammonium Chloride	Irritant	Irritant	55 lbs	P	49,051	Pounds
Borax Series (Anhydrous, 5 mol, 10 mol, 30/100)	Irritant	Irritant	55 lbs	P	27,881	Pounds
Carbowax PEG 8000	Irritant	Irritant	55 lbs	P	544	Pounds
Cream of Tarter	Irritant	Irritant	55 lbs	P	11,258	Pounds
Dissolvine NA2-P	Irritant	Irritant	55 lbs	P	163	Pounds
EDTA Ferric Sodium/Sequestar Iron Chelate	Irritant	Irritant	55 lbs	P	5,550	Pounds
EDTA Manganese Disodium	Irritant	Irritant	55 lbs	P	8,135	Pounds
Magnesium Oxide	Irritant	Irritant	55 lbs	P	0	Pounds
Manganese Disodium EDTA	Irritant	Irritant	55 lbs	P	0	Pounds
Potassium Metabisulfite	Irritant	Irritant	55 lbs	P	34,257	Pounds
Potassium Sulfate	Irritant	Irritant	55 lbs	P	4,737	Pounds
Sodium Hexametaphosphate	Irritant	Irritant	55 lbs	P	7,833	Pounds
Sodium Metabisulfite	Irritant	Irritant	55 lbs	P	7,100	Pounds
Sodium Thiosulfate	Irritant	Irritant	55 lbs	P	1,138	Pounds
Tartaric Acid	Irritant	Irritant	55 lbs	P	17,908	Pounds
Tetrasodium Pyroshosphate	Irritant	Irritant	55 lbs	P	1,976	Pounds
Trisodium Phosphate Crystals	Irritant	Irritant	55 lbs	P	1,946	Pounds
EDTA Zinc Disodium	Irritant	Irritant	55 lbs	P	15,145	Pounds
NTA Powder, Dissolvine A-92	Irritant	Irritant Carcinogen	55 lbs	P	299	Pounds
Trilon BS Powder	Irritant	Irritant Carcinogen	55 lbs	P	0	Pounds
Trilon BX Powder	Irritant	Irritant Carcinogen	55 lbs	P	319	Pounds
Ascorbic Acid	Irritant		55 lbs	P	3,989	Pounds
Celvol 205S	Irritant		55 lbs	P	0	Pounds
Benzoic Acid	Irritant	Irritant	55 lbs	P	385	Pounds
BFP 75A and 75K Flake	Irritant	Irritant	55 lbs	P	16,831	Pounds
EDTA Copper Disodium	Irritant	Irritant	55 lbs	P	1,984	Pounds
Dipotassium Phosphate	Irritant	Irritant	55 lbs	P	15,762	Pounds
Potassium Carbonate	Irritant	Irritant	55 lbs	P	12,497	Pounds
Copper Disodium EDTA	Irritant	Irritant	55 lbs	P	0	Pounds
Sodium Erythorbate	Irritant	Irritant	55 lbs	P	0	Pounds

Tetrapotassium pyrophosphate, TKPP	Irritant		Irritant	55 lbs	P	19,344	Pounds
Potassium Chloride	Irritant		Irritant	55 lbs	P	17,179	Pounds
E-Max Detergent	Irritant	), UN3082, PG III	Corrosive Irritan	550 gallon	P	2,039	Gallons
Calcium Chloride Solution	Irritant			550 gallon	P	4,262	Gallons
Activated Carbon	Irritant			551 lbs	P	24,259	Pounds
Magnesium Carbonate	Irritant		Irritant	80 lbs	P	0	Pounds

COMMON NAME/ CHEMICAL NAME	Tote Area	FIRE CODE HAZARD CLASSES	LARGEST CONTAINER		AVERAGE DAILY AMOUNT	UNITS
-3	Oxidizer	5.1, UN1498, PG III Oxidizer Class 2 Irritant	100 lbs	P	735	Pounds
Calcium Hypochlorite 65% (All Dry Forms)	Oxidizer	5.1, UN2880, PG II Oxidizer Class 3 Unstable (Reactive) Irritant	100 lbs	P	5,411	Pounds
Hydrogen Peroxide 6-25%	Oxidizer	5.1, (8), UN2014, PG II Oxidizer Class 2 Corrosive	330 gallon	P	350	Gallons
Hydrogen Peroxide 50%	Oxidizer	5.1, (8), UN2014, PG II Oxidizer Class 2 Corrosive	330 gallon	P	1,626	Gallons
Proxitane EQ Liquid Sanitizer	Oxidizer	5.1, (8), UN3149, PG II Corrosive	470 lbs	P	15,974	Pounds
Bromine Tablets	Oxidizer	5.1, UN1479, PG II Oxidizer Class I	50 lbs	P	1,880	Pounds
Lithium Hypochlorite	Oxidizer	5.1 UN1479, PG III Oxidizer Irritant	50 lbs	P	1,775	Gallons
Sodium Nitrate	Oxidizer	5.1, UN1498, PG III Oxidizer Class 1 Corrosive	50 lbs	P	1,520	Pounds
Sodium Percarbonate	Oxidizer	5.1, UN3378, PG III Oxidizer Class 2 Irritant	50 lbs	P	1,720	Pounds
Sodium tripolyphosphate (HD, LD, PWD)	Oxidizer	Oxidizer Class 1	50 lbs	P	11,796	Pounds
Potassium Permanganate	Oxidizer	5.1, UN1490, PG II Oxidizer Class 2	55 lbs	P	2,873	Pounds
Sodium Persulfate	Oxidizer	5.1, UN1505, PG III Oxidizer Class 1	55 lbs	P	2,205	Pounds
Hydrogen Peroxide 30-35%	Oxidizer	5.1, (8), UN2014, PG II Oxidizer Class 2 Corrosive	550 gallon	P	9,634	Gallons

H-4 Room

COMMON NAME/ CHEMICAL NAME		FIRE CODE HAZARD CLASSES	LARGEST CONTAINER		AVERAGE DAILY AMOUNT	UNITS
Sodium Silicofluoride	Poison	6.1, UN2674, PG III Toxic Irritant	50 lbs	P	7,982	Pounds
Sodium Fluoride	Poison	6.1 UN1690, PG III Toxic Irritant	50 lbs	P	20,380	Pounds
Methylene Chloride	Poison	6.1, UN1593, PG III Toxic Carcinogen Other Health Hazard	55 gallon	P	78	Gallons
Brennsolv 7500	Poison	6.1, UN2810, PG III	55 gallon	P	0	Gallons
Phenol	Poison	6.1, UN2821, PG II Combustible Liquid Class III Toxic Reactive Class 1	55 gallon	P	684	Pounds

List of Subcontractors

K. Patrick Williams Company

General Engineering Contractor License No. 406029
P.O. Box 26146 - Fresno, CA. 93729
Email : kpwco@aol.com
Office (559)434-2990 - FAX (559)434-2999 - Cell (559)269-9340

April 7, 2014

To Whom it may Concern,

Our company has been selected to perform earthwork and asphalt paving services for the proposed project for Brenntag Pacific Inc. We look forward to representing Target Constructors, Inc. as their subcontractor. We are proud of our accomplishments since 1981 and are confident that this development will serve to stimulate other businesses to develop at this location. The size of the parcels, zoning, freeway access, proximity to rail service, utilities, and improved roadways are just some of the attributes that this industrial subdivision has to offer.

We are not privy to the total cost of this proposed development, but based on our contract portion for site development, it is obvious that the local economy will benefit from the business created by Brenntag's presence. Our construction company currently has five full time employees including myself and none of us live in the District. I feel more important than our personal physical addresses is the money that we will be spending to complete our work within District 3. We will be spending approximately $350,000.00 on materials for this project, the two suppliers we will be using are either in or within immediate proximity to District 3. They employ between 100 to 200 people between them and one would imagine a high percentage reside in District 3 for convenience to their work location. Approximately $75,000.00 will be spent on material hauling and our trucking subcontractor is located within District 3 boundaries; they maintain and operate approximately 50 trucks and the local community obviously benefits from their daily operations. We anticipate that this project will be ongoing for approximately one year; we estimate a total of 45 working days for our work. Inevitably we will have daily costs for repairs, fuel, meals, and miscellaneous materials, we are acutely aware that time is money and we will search out local businesses to expedite our needs.

We support this project and hope it serves as a positive first step for future development within this community.

Respectfully submitted,

Keith P. Williams, owner

B & L MECHANICAL, INC.

DESIGN/BUILD MECHANICAL CONTRACTORS
MAILING: P.O. BOX 13189 – FRESNO, CA. 93794-3189
SHIPPING: 3218-3220 N. MARKS AVE. – FRESNO, CA. 93722
FRESNO PH: (559) 268-2727 FAX: (559) 268-1780
(SINCE 1986) CALIFORNIA STATE CONSTRACTORS' LICENSE NO. 492481
E-mail = elanfranco@blminc.com

April 7, 2014

Target Constructors, Inc.
40405 Brickyard Drive, Suite 110
Madera, CA. 93636

Attn: Ms. Amy Castro
Contract Administrator

Re: Brenntag Project - District 3 Employees

Ms. Castro,

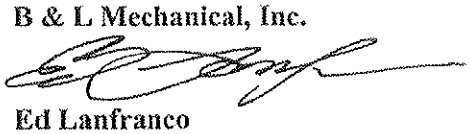
B & L Mechanical is located in the Enterprise zone and currently has 21 employees of which only one currently resides within the City of Fresno's Council District 3.

We plan to have a crew of 4 on this project so 25% of our crew would be from District 3 if that is what you are looking for. The estimated total wages and related payroll cost for a crew of 4 would average between $800.00 to a $1,000.00 per day.

Note that B & L Mechanical would be agreeable to hiring from District 3 assuming the employees are physically able and have the sufficient knowledge to install commercial HVAC systems correctly and in a safe manner.

Please advise should you require any additional information at this time.

Sincerely,
B & L Mechanical, Inc.



Ed Lanfranco
President & CEO

WESTECH SYSTEMS, INC.
ELECTRICAL CONTRACTORS

April 8, 2014

Target Constructors, Inc
40405 Brickyard Drive, Suite 110
Madera, Ca 93636

Re: Brenntag Project

To whom it may Concern,

This letter is in reference to the future Brenntag Project located in District 3 of Fresno, Ca. We are pleased to introduce our company, Westech Systems, Inc. We are a local Electrical Contractor and would like to express the positive impact that this project will have on our Employees and Suppliers. Westech currently has 25% of employees that reside within District 3. This project would create $ 269,000.00 in payroll income for those (7) employees working on this project, with an investment of over 8900 hours of workforce. Westech will be purchasing over $250, 00.00 in materials from Graybar Electric which is also located within District 3.

We look forward to having the opportunity to participate in this project and support District 3 of Fresno, Ca.

Best Regards,
Helder Domingos
President/ Owner
Westech Systems, Inc.

MATTOS UNDERGROUND CONSTRUCTION, INC.
819 E. Wood Ave. • Laton, CA. 93242 • Tel. (559) 923-4615 • Fax (559) 923-4651

April 10, 2014

Target Constructors, Inc.
40405 Brickyard Drive, Suite 110
Madera, CA 93636

RE: Brenntag Pacific, Inc.: North Hughes Plant
Report of Work Force / Community of District 3

Dear Target Constructors, Inc. and the City of Fresno,

Thank you for considering us for your project. We look forward to working with you. Mattos Underground Construction, Inc. is a family-based corporation located in south Fresno County. We have been in business for over 20 years, and incorporated since 2002. Mattos Underground Construction, Inc. is also a certified Small Business/Micro-Business Enterprise along with being a certified Disadvantaged/Women-Owned Business Enterprise specializing in underground site utilities.

Most of our work force has been with us a very long time and, fortunately, we do not experience much turn-over. We believe we will average a 6 man crew on this project with an anticipated workforce payroll between $45,000.00 and $50,000.00. However, none of our employees actually live in the District 3 area of Fresno.

Regarding our suppliers, our main pipe and underground utility supplier is located in District 3. Ferguson Waterworks/Groeniger & Company is located at 2812 S. Orange Ave., Fresno, CA 93725 and we anticipate using approximately $40,000.00 of their products. We have used them as our main supplier for many years and we remain confident in their products and service. Another supplier we believe to be in District 3 is Calaveras Materials, located at 2175 E. Central Ave., Fresno. We anticipate using approximately $11,000.00 of their asphalt. Both of these suppliers are quite large and employ a large number of employees.

Once again, thank you for this opportunity to work with you,

Nanette Mattos, President/CEO
Mattos Underground Construction, Inc.

THE PLUMBING CO. INC

1060 Holland Ave, Ste B
Clovis, CA 93612

phone 559 292-1777
fax 559 292-0167
mobile 559 259-4723
e-mail plumbco1@sbcglobal.net

To: Target
Attn: Amy
Fax: 449-9191

Brenntag 4-8-14

To Whom It May Concern:

I currently have no employees that live in District 3. Although we do buy some of our job materials located within this district. During the course of this project I estimate approximately $65,000.00 in payroll expenses at this location. We will have four or five employees at a time working on this job site consistently. We will be purchasing fuel and food items from locations within this District for the duration of the project.

Thanks you,

Josh Rathbone
President

VALLEY GLASS CO. INC.

April 8, 2014

Good morning,

In regards to your request, none of our employees live in District 3, However, we will have a work force of three employees, with a payroll of $23,000.00, but none live in the district.

Should you have any questions, please feel free to give me a call.

Thank you,

Mike Salinas

Mike Salinas
Valley Glass Co. Inc.
Owner/President
559 226-6445 – office
559 226-7783 - fax

CONTECH
CONCRETE
TECHNIQUES
CONTECH

Phone 559.251.8818
5819 E. Harvard
License #735837

Fax 559.251.8821
Fresno, CA 93727

DISTRICT 3

Company: Target Constructors

Attention: Amy Castro

Date: 04/08/14
Project: Brenntag Tag Pacific, Inc.
City: Fresno State: CA

Per your request for District 3

1. We have no employees currently living in district 3.
2. We average 6-14 men onsite.
3. Approximately payroll for project $145,000

JOHNSON FIRE PROTECTION, INC.

License # 945080

Target Constructors, Inc.
40405 Brickyard Drive
Madera, CA 93636

Attn: Amy Castro

Regarding: District 3 Impact - Brentag

Amy,
The proposed Brentag project will require (2) field crews of 2 men per crew with an average wage of $18.00 per hour. We anticipate our portion of work to take approximately 3 weeks to complete.

Johnson Fire Protection currently has no employee's that live in District 3.

Please call me direct on my cell @ 559-736-0563 with any questions or concerns.

Respectfully,
Josh Johnson
Josh Johnson
President
Johnson Fire Protection, Inc.

Dynamic Electrical Contracting, Inc.

737 W. Omaha Ave.
Clovis, CA 93619
559-297-6820 Phone
559-297-6840 Fax

License #839187
Bruce Peters
DynamicElec@msn.com
559-314-4253 Cell

Target Constructors
40405 Brickyard Drive #110
Madera, CA 93636

Attn: Amy Castro

Re: Brenntag Project

Amy,

This project will employ an average of 8-10 electricians with a total payroll of $175,000.00 over the course of the project. Unfortunately, none of our employees currently live in district 3.

Thank you,

Bruce Peters
Dynamic Electric