



# AGENDA

## BOARD OF SUPERVISORS, COUNTY OF MONO STATE OF CALIFORNIA

Regular Meetings: First, Second, and Third Tuesday of each month. Location of meeting is specified below.  
Meeting Location: Mono Lake Room, 1st Fl., County Civic Center, 1290 Tavern Rd., Mammoth Lakes, CA  
93546

### Regular Meeting January 16, 2024

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#### TELECONFERENCE INFORMATION

This meeting will be held in person at the location listed above. Additionally, a teleconference location will be available where the public and members of the Board may participate by electronic means.

1. Mammoth Teleconference Location – for meetings held on the first and second Tuesday of each month - Mono Lake Room of the Mono County Civic Center, First Floor, 1290 Tavern Road, Mammoth Lakes, CA. 93546;
2. Bridgeport Teleconference Location – for meetings held on the third Tuesday of each Month - Mono County Courthouse, Second Floor Board Chambers, 278 Main Street, Bridgeport, CA. 93517;
3. Zoom Webinar.

Members of the public may participate via the Zoom Webinar, including listening to the meeting and providing public comment, by following the instructions below.

#### **To join the meeting by computer:**

Visit <https://monocounty.zoom.us/j/88084727262> or visit <https://www.zoom.us/>, click on "Join A Meeting" and enter the Zoom Webinar ID 880 8472 7262.

To provide public comment, press the "Raise Hand" button on your screen.

#### **To join the meeting by telephone:**

Dial (669) 900-6833, then enter Zoom Webinar 880 8472 7262

To provide public comment, press \*9 to raise your hand and \*6 to mute/unmute.

If you are unable to join the Zoom Webinar of the Board meeting, you may still view the live stream of the meeting by visiting: [https://monocounty.granicus.com/MediaPlayer.php?publish\\_id=68a69f03-6511-41ef-ae37-636788b98695](https://monocounty.granicus.com/MediaPlayer.php?publish_id=68a69f03-6511-41ef-ae37-636788b98695)

**NOTE:** In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Clerk of the Board at (760) 932-5530 or [bos@mono.ca.gov](mailto:bos@mono.ca.gov). Notification 48 hours prior to the meeting will enable the County to make reasonable arrangements to ensure accessibility to this meeting (See 42 USCS 12132, 28CFR 35.130).

Full agenda packets are available for the public to review in the Office of the Clerk of the Board (Annex I - 74 North School Street, Bridgeport, CA 93517) and online at <http://monocounty.ca.gov/bos>. Any writing distributed

less than 72 hours prior to the meeting will be available for public inspection in the Office of the Clerk of the Board and online.

***UNLESS OTHERWISE SPECIFIED BY TIME, ITEMS SCHEDULED FOR EITHER THE MORNING OR AFTERNOON SESSIONS WILL BE HEARD ACCORDING TO AVAILABLE TIME AND PRESENCE OF INTERESTED PERSONS. PUBLIC MAY COMMENT ON AGENDA ITEMS AT THE TIME THE ITEM IS HEARD.***

9:00 AM Call meeting to Order

Pledge of Allegiance

**1. OPPORTUNITY FOR THE PUBLIC TO ADDRESS THE BOARD**

Opportunity for the public to address the Board on items of public interest that are within the subject matter jurisdiction of the Board. (Speakers may be limited in speaking time dependent upon the press of business and number of persons wishing to address the Board.) Please refer to the Teleconference Information section to determine how to make public comment for this meeting via Zoom.

**2. RECOGNITIONS**

**A. Election of New 2024 Board Chair**

Departments: Board of Supervisors

5 minutes

(Rhonda Duggan, Outgoing Board Chair) - The outgoing Board Chair will call for nominations to elect the Chair of the Board for 2024.

**Recommended Action:** Elect the new Chair of the Board for 2024.

**Fiscal Impact:** None.

**B. Presentation to Outgoing Board Chair Rhonda Duggan**

Departments: Board of Supervisors

5 minutes

(Newly Elected Board Chair) - Presentation to outgoing Board Chair Rhonda Duggan by newly elected Board Chair honoring Supervisor Duggan's service to the Board in 2023.

**Recommended Action:** None.

**Fiscal Impact:** None.

**C. Election of New 2024 Vice Chair**

Departments: Board of Supervisors

5 minutes

(Newly Elected Board Chair) - The newly elected Board Chair will call for nominations to elect the Vice Chair of the Board for 2024.

**Recommended Action:** Elect the new Vice Chair of the Board for 2024.

**Fiscal Impact:** None.

**D. Election of New 2024 Chair Pro-Tem**

Departments: Board of Supervisors

5 minutes

(Newly Elected Board Chair) - The newly elected Board Chair will call for nominations to elect the Chair Pro-Tem of the Board for 2024.

**Recommended Action:** Elect the new Chair Pro-Tem of the Board for 2024.

**Fiscal Impact:** None.

**3. COUNTY ADMINISTRATIVE OFFICER**

CAO Report regarding Board Assignments

Receive brief oral report by County Administrative Officer (CAO) regarding work activities.

**4. DEPARTMENT/COMMISSION REPORTS**

Receive brief oral report on emerging issues and/or activities.

**5. CONSENT AGENDA**

(All matters on the consent agenda are to be approved on one motion unless a board member requests separate action on a specific item.)

**A. Board Minutes**

Departments: Clerk of the Board

1. Approval of Board minutes from the November 2023, regular meetings. 2. Approval of Board minutes from the December 2023, regular meetings.

**Recommended Action:** 1. Approve the Board minutes from the November 7, 2023, regular meeting. 2. Approve the Board minutes from the November 21, 2023, regular meetings 3. Approve the Board minutes from the December 5, 2023, regular meeting. 4. Approve the Board minutes from the December 12, 2023, regular meeting.

**Fiscal Impact:** None.

**B. Annual Resolution Delegating Investment Authority to the County Treasurer**

Departments: Finance

Resolution Delegating Investment Authority to the County Treasurer.

**Recommended Action:** Adopt proposed resolution, Delegating Investment Authority to the County Treasurer.

**Fiscal Impact:** None.

**C. Mono County Statement of Investment Policy**

Departments: Finance

Annual approval of the Mono County Statement of Investment Policy pursuant to Section 27133 of the Government Code of the State of California.

**Recommended Action:** Approve the Mono County Statement of Investment Policy as presented or amended.

**Fiscal Impact:** None.

**D. Second Reading: Proposed Ordinance Establishing Title 20, “Chapter 20.20 – Density Bonus Ordinance,” in the Mono County Code to Implement the State Density Bonus Law**

Departments: Community Development

Proposed ordinance establishing Title 20, “Chapter 20.20 – Density Bonus Ordinance,” in the Mono County Code to Implement the State Density Bonus Law.

**Recommended Action:** Find that the ordinance is not a project under CEQA Guidelines §15378(b)(2) because it establishes general policy and procedures for compliance with state law, and development projects utilizing the ordinance are separately subject to CEQA compliance. Direct staff to file a Notice of Exemption. Adopt proposed ordinance.

**Fiscal Impact:** None. Staff time to process applications is included in the Department's budget.

**6. CORRESPONDENCE RECEIVED - NONE**

Direction may be given to staff regarding, and/or the Board may discuss, any item of correspondence listed on the agenda.

**7. REGULAR AGENDA - MORNING**

**A. PUBLIC HEARING: Apogee Farms Cannabis Cultivation: General Plan Amendment and Specific Plan**

Departments: Community Development

PUBLIC HEARING: 9:00 AM (20 minutes)

(Aaron M. Washco, Planning Analyst) - Consider a proposed cannabis cultivation project near Benton, which requires a General Plan Amendment to change the Land Use Designation of two parcels (APNs 025-020-013 and 025-040-002) from Rural Residential-40 to Specific Plan, and adoption of the Apogee Farm Specific Plan which sets develop standards and policies and makes use permit findings for commercial cannabis activities and overhead utility lines. A mitigated negative declaration and mitigation, monitoring and reporting program are proposed in compliance with the California Environmental Quality Act.

**Recommended Action:**

1. Conduct a public hearing on the General Plan Amendment, the Apogee Farm Specific Plan, and the associated Mitigated Negative Declaration environmental report, receive any additional public comments, deliberate the project, and make any desired modifications.
2. Following the public hearing and project deliberations, certify the Mitigated Negative Declaration (MND); adopt the Mitigation Monitoring and Reporting Program; and adopt the proposed resolution and adopt proposed ordinance adopting GPA 24-01 and the Apogee Farm Specific Plan, which also includes a Use Permit for commercial cannabis and overhead power.

**Fiscal Impact:** Approval of the General Plan Amendment and Specific Plan allow the landowner to conduct a commercial cannabis business, resulting in increased tax revenue for the County from these parcels. Note, cannabis taxes derived from cultivation are waived until June 30, 2025.

**B. Mammoth Hospital Expansion - Update**

Departments: County Administrative Office

15 minutes

(Tom Parker, Chief Executive Officer) - Presentation on the update of the Mammoth Hospital expansion.

**Recommended Action:** None, informational only.

**Fiscal Impact:** None.

**C. Inyo-Mono Broadband Consortium Update**

Departments: Board of Supervisors, Sponsored by Supervisor Gardner

15 minutes

(Scott Armstrong, Regional Broadband Coordinator) - Presentation from Scott Armstrong, Regional Broadband Coordinator, on broadband-related activities.

**Recommended Action:** None, informational only.

**Fiscal Impact:** None.

**D. Funding Opportunities for Affordable Housing and Other Projects**

Departments: County Counsel  
30 minutes

(Christopher Beck, Assistant County Counsel) - Provide the Board with an update regarding funding opportunities, including enhanced infrastructure financing districts (EIFDs), increase in transient occupancy tax (TOT), or other options, for affordable housing and other projects.

**Recommended Action:** Provide direction to staff regarding options which should be investigated further and brought back to the Board for future action.

**Fiscal Impact:** None.

**E. Updated Diversity Equity and Inclusion Resolution**

Departments: County Administrative Office  
20 minutes

(Christine Bouchard, Assistant County Administrative Officer) - Proposed resolution Affirming Mono County's Commitment to Diversity, Equity, and Inclusion (DEI).

**Recommended Action:** Adopt proposed resolution. Provide any desired direction to staff.

**Fiscal Impact:** None.

**F. Appointments of Supervisors to Boards, Commissions, and Committees for 2024**

Departments: Clerk of the Board  
5 minutes

(Queenie Barnard, Clerk-Recorder-Registrar) - Mono County Supervisors serve on various boards, commissions, and committees for one-year terms that expired on December 31, 2023. Each January, the Board of Supervisors makes appointments for the upcoming year. The Board of Supervisors made appointments for 2024 at the January 9, 2024, meeting. However, due to Supervisor Peters' absence, this item is being brought forward again to make any additional changes.

**Recommended Action:** Appoint Supervisors to boards, commissions, and committees for 2024.

**Fiscal Impact:** None.

**G. Election Education Series Part 2: Election Technology, Security, and Observers**

Departments: Elections  
15 minutes

(Queenie Barnard, Registrar of Voters) - In anticipation of the upcoming March 5, 2024, Presidential Primary Election, the Mono County Registrar will be presenting a four-part Election Education Series to the Board of Supervisors and public. Part 2 of the series will review Election Technology, Security, and Observers.

**Recommended Action:** None, informational only. Provide any desired direction to staff.

**Fiscal Impact:** None.

**8. CLOSED SESSION**

**A. Closed Session - Labor Negotiations**

CONFERENCE WITH LABOR NEGOTIATORS. Government Code Section 54957.6. Agency designated representative(s): Sandra Moberly, Mary Booher, Stacey Simon, Janet Dutcher, Jay Sloane, Christine Bouchard, and Oliver Yee. Employee Organization(s): Mono County Sheriff's Officers Association (aka Deputy Sheriff's Association), Local 39 - majority representative of Mono County Public Employees (MCPE) and Deputy Probation Officers Unit (DPOU), Mono County Paramedic Rescue Association (PARA), Mono County Correctional Deputy Sheriffs' Association. Unrepresented employees: All.

**B. Closed Session - Public Employee Evaluation**

PUBLIC EMPLOYEE PERFORMANCE EVALUATION. Government Code section 54957. Title: County Administrative Officer.

**9. BOARD MEMBER REPORTS**

The Board may, if time permits, take Board Reports at any time during the meeting and not at a specific time.

**ADJOURN**



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Board of Supervisors**

**TIME REQUIRED** 5 minutes

**SUBJECT** Election of New 2024 Board Chair

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

Rhonda Duggan, Outgoing Board  
Chair

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

The outgoing Board Chair will call for nominations to elect the Chair of the Board for 2024.

**RECOMMENDED ACTION:**

Elect the new Chair of the Board for 2024.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Danielle Patrick

**PHONE/EMAIL:** 7609325535 / despinosa@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|  |
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| <p><a href="#">Click to download</a></p> <p>No Attachments Available</p> |
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**History**

Time

Who

Approval





**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Board of Supervisors**

**TIME REQUIRED** 5 minutes

**PERSONS APPEARING BEFORE THE BOARD** Newly Elected Board Chair

**SUBJECT** Presentation to Outgoing Board Chair Rhonda Duggan

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Presentation to outgoing Board Chair Rhonda Duggan by newly elected Board Chair honoring Supervisor Duggan's service to the Board in 2023.

**RECOMMENDED ACTION:**

None.

**FISCAL IMPACT:**

None.

**CONTACT NAME:**

**PHONE/EMAIL:** /

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

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| <p><a href="#">Click to download</a></p> <p>No Attachments Available</p> |
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**OFFICE OF THE CLERK  
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**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Board of Supervisors**

**TIME REQUIRED** 5 minutes

**PERSONS APPEARING BEFORE THE BOARD** Newly Elected Board Chair

**SUBJECT** Election of New 2024 Vice Chair

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

The newly elected Board Chair will call for nominations to elect the Vice Chair of the Board for 2024.

**RECOMMENDED ACTION:**

Elect the new Vice Chair of the Board for 2024.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Danielle Patrick

**PHONE/EMAIL:** 7609325535 / despinosa@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

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**History**

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Who

Approval



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Board of Supervisors**

**TIME REQUIRED** 5 minutes

**PERSONS APPEARING BEFORE THE BOARD** Newly Elected Board Chair

**SUBJECT** Election of New 2024 Chair Pro-Tem

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

The newly elected Board Chair will call for nominations to elect the Chair Pro-Tem of the Board for 2024.

**RECOMMENDED ACTION:**

Elect the new Chair Pro-Tem of the Board for 2024.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Danielle Patrick

**PHONE/EMAIL:** 7609325535 / despinosa@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|  |
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**History**

Time

Who

Approval



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE**     January 16, 2024

**Departments: Clerk of the Board**

**TIME REQUIRED**

**SUBJECT**             Board Minutes

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

1. Approval of Board minutes from the November 2023, regular meetings.
2. Approval of Board minutes from the December 2023, regular meetings.

**RECOMMENDED ACTION:**

1. Approve the Board minutes from the November 7, 2023, regular meeting.
2. Approve the Board minutes from the November 21, 2023, regular meetings.
3. Approve the Board minutes from the December 5, 2023, regular meeting.
4. Approve the Board minutes from the December 12, 2023, regular meeting.

**FISCAL IMPACT:**

None.

**CONTACT NAME:**

**PHONE/EMAIL:** /

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|  |
|--|
| <b>Click to download</b>   |
| <input type="checkbox"/> <a href="#">November 7, 2023 DRAFT Meeting Minutes</a>  |
| <input type="checkbox"/> <a href="#">November 21, 2023 DRAFT Meeting Minutes</a> |
| <input type="checkbox"/> <a href="#">December 5, 2023 Draft Minutes</a>          |
| <input type="checkbox"/> <a href="#">December 12, 2023 Draft Minutes</a>         |

History

| <b>Time</b>       | <b>Who</b>                   | <b>Approval</b> |
|-------------------|------------------------------|-----------------|
| 1/9/2024 4:15 PM  | County Counsel               | Yes             |
| 1/3/2024 2:45 PM  | Finance                      | Yes             |
| 1/10/2024 8:16 AM | County Administrative Office | Yes             |



**DRAFT MEETING MINUTES  
BOARD OF SUPERVISORS, COUNTY OF MONO  
STATE OF CALIFORNIA**

Regular Meetings: First, Second, and Third Tuesday of each month. Location of meeting is specified below.

Meeting Location: Board Chambers, 2nd Fl., County Courthouse, 278 Main St., Bridgeport, CA 93517

**Regular Meeting  
November 7, 2023**

**Backup Recording**

**Zoom**

**Minute Orders**

**M23-246 – M23-260**

**Resolutions**

**R23-095 - R23-099**

**Ordinance**

**ORD23-007 Used**

9:00 AM Meeting called to order by Chair Duggan.

*Supervisors Present: Duggan, Gardner, Kreitz, Salcido, and Peters. (All members were present in-person or participated via teleconference in compliance with rules established by the Ralph M. Brown Act).*

*Supervisors Absent: None.*

The Mono County Board of Supervisors stream most of their meetings live on the internet and archives them afterward. To search for a meeting from June 2, 2015, forward, please go to the following link: <http://www.monocounty.ca.gov/meetings>

Pledge of Allegiance led by Supervisor Gardner.

**1. OPPORTUNITY FOR THE PUBLIC TO ADDRESS THE BOARD**

**Paula Richards, Rock Creek Ranch:**

- Asked the Board to agendize her project.

**2. RECOGNITIONS**

**A. Retirement Recognition of Claude Fiddler for His Years of Service with Mono County**

Departments: Public Works - Facilities

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

(Paul Roten, Public Works Director) - Proposed proclamation of the Mono County Board of Supervisors recognizing Claude Fiddler for his years of service to Mono County and the Department of Public Works.

**Action:** Approved proclamation recognizing Claude Fiddler as amended.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-246**

**Paul Roten, Public Works Director:**

- Presented item.

**Stacey Simon, County Counsel:**

- Clarified the date and will update the proclamation.

### **3. COUNTY ADMINISTRATIVE OFFICER**

**Sandra Moberly, County Administrative Officer:**

- Update on Tyrone Grandstrand and the Housing Opportunities Manager position moving forward.

### **4. DEPARTMENT/COMMISSION REPORTS**

**Queenie Barnard, Clerk-Recorder-Registrar-Clerk of the Board of Supervisors:**

- Update on the Elections today for the Tri-Valley Ground Water Management District.
- Update on Primary Elections in March of 2024 for candidate filings.

**Stacey Simon, County Counsel:**

- Clarified bringing the Elections update back to the Board for further discussion as an agenda item.

### **5. CONSENT AGENDA**

(All matters on the consent agenda are to be approved on one motion unless a board member requests separate action on a specific item.)

#### **A. Board Minutes**

Departments: Clerk of the Board

Approval of Board minutes from July 2023, regular meetings. Approval of Board minutes from August 2023, regular meetings. Approval of Board minutes from the August 2023, special meeting.

**Action:** 1. Approved the Board minutes from the July 11, 2023, regular meeting. 2. Approved the Board minutes from the July 18, 2023, regular meeting. 3. Approved the Board minutes from the August 1, 2023, regular meeting. 4. Approved the Board minutes from the August 8, 2023, regular meeting. 5. Approved the Board minutes from the August 15, 2023, regular meeting. 6. Approved of Board minutes from the August 10, 2023, special meeting.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**Peters moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-247**

**B. In-Home Supportive Services Non-Profit Consortium Rate Change Request**

Departments: Health and Human Services

Seeking Board approval for an In-Home Supportive Services Public Authority/Non-Profit Consortium (PA/NPC) Rate Change Request and associated change in administrative costs for submission to the California Department of Social Services.

**Action:** Approved the proposed In-Home Supportive Services (IHSS) Public Authority/Non-Profit Consortium (PA/NPC) Rate Change Request and associated change in administrative costs.

**Peters moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-248**

**C. Organizational Mind Group Contract Amendment - Behavioral Health Department Consulting Services**

Departments: Behavioral Health

Proposed contract amendment with Beth A. Cohen, Ph.D., dba Organizational Mind Group pertaining to management consulting services provided to the Behavioral Health Department.

**Action:** Approved, and authorized Chair, to sign, contract amendment with Beth A. Cohen, Ph.D., dba Organizational Mind Group for management consulting services provided to the Behavioral Health Department for the period through December 31, 2023, and a not-to-exceed amount of \$55,000. The new total contract limit would be \$140,000.

**Peters moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-249**

**D. At-Will Salary Matrix Amendment**

Departments: Human Resources

Proposed resolution of the Mono County Board of Supervisors directing the County Administrative Officer to amend the salary matrix applicable to at-will employees and elected department heads enacted by Resolution R23-016 to increase the salary rate for the Range 27 Step E position, applicable to the

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**



Public Health Officer.

**Action:** Adopted Resolution.R23-095, Amending the salary matrix applicable to at-will employees and elected department heads enacted by Resolution R23-016 to increase the salary rate for the Range 27 Step E position, applicable to the Public Health Officer.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-095**

**E. Resolution Authorizing Amendment of the Mono County Allocation List for the Clerk Recorder's Office**

Departments: Human Resources and Clerk Recorder

Proposed resolution of the Mono County Board of Supervisors authorizing the County Administrative Officer to amend the County of Mono list of allocated positions to eliminate one Fiscal Technical Specialist IV and add one Administrative Services Specialist in the department of the Clerk Recorder.

**Action:** None, item pulled.

**F. Resolution Authorizing the Amendment to the Mono County Allocation List for Public Works**

Departments: Human Resources and Public Works

Proposed resolution of the Mono County Board of Supervisors authorizing the County Administrative Officer to amend the County of Mono list of allocated positions to eliminate one Administrative Services Specialist and add one Fiscal and Administrative Services Officer in the Department of Public Works.

**Action:** Adopted Resolution R23-096, Authorizing the County Administrative Officer to amend the County of Mono list of allocated positions to eliminate one Administrative Services Specialist and add one Fiscal and Administrative Services Officer in the Department of Public Works.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-096**

**G. Agreement with Victoria L. Campbell, Esq. for the Provision of Indigent Defense Services**

Departments: County Administrative Office

Proposed contract with Victoria L. Campbell, Esq. for the provision of indigent defense services in Mono County.

**Action:** Approved, and authorized Chair to sign, contract with Victoria L.

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors

Campbell, Esq. for the provision of indigent defense services for the period December 11, 2023, through December 10, 2025, with option to extend, and a not-to-exceed amount of \$16,065/month with 2% automatic annual increases.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-250**

#### **H. Public Works Reclassification**

Departments: Public Works

Reclassification of Judy Curti into the position of Fiscal and Administrative Services Officer, starting at step B.

**Action:** Approved Judy Curti's reclassification to Fiscal and Administrative Services Officer at the pay rate of Range 79, Step B, of the Mono County Public Employee Pay Matrix.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-251**

#### **I. Rock Creek Snow Removal Agreement**

Departments: Public Works

Proposed resolution to provide snow removal services along Rock Creek Road for the State Department of Parks and Recreation.

**Action:** 1. Adopted Resolution R23-097, Authorizing entry into an agreement with California State Parks for snow removal services at Rock Creek SNO-Park.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-097**

2. Authorized Public Works Director to sign agreement C23550014 between the California Department of Parks and Recreation and Mono County Public Works.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-252**

#### **J. Memorandum of Understanding with Eastern Sierra Unified School District**

Departments: Probation

Memorandum of Understanding (MOU) with Eastern Sierra Unified School District to provide funding for after-school programs within the District using Proposition 64 Public Health and Safety Grant funds.

**Action:** Approved County to enter into MOU with Eastern Sierra Unified School District and authorize County Administrative Officer to execute said MOU on behalf of the County.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**Peters moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-253**

**K. Monthly Treasury Transaction Report**

Departments: Finance

Treasury Transaction Report for the month ending 9/30/2023.

**Action:** Approved the Treasury Transaction Report for the month ending 9/30/2023.

**Peters moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-254**

**L. Quarterly Investment Report**

Departments: Finance

Investment Report for the Quarter ending 9/30/2023.

**Action:** Approved the Investment Report for the Quarter ending 9/30/2023.

**Peters moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-255**

**6. CORRESPONDENCE RECEIVED**

Direction may be given to staff regarding, and/or the Board may discuss, any item of correspondence listed on the agenda.

**A. Governor's Proclamation for the March 5, 2024, Presidential Primary Election**

Departments: Elections

A proclamation by the Governor of the State of California that the Presidential Primary Election will be held throughout the state on Tuesday, March 5, 2024.

**B. Correspondence between Congressman Kiley's Office and the United States Postal Service regarding the Bridgeport Post Office**

Departments: County Administrative Office

Correspondence received between Congressman Kiley's office to the United States Postal Service regarding the Bridgeport Post Office.

**Supervisor Peters:**

- Asked to agendize this for further discussion.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

## 7. REGULAR AGENDA - MORNING

### A. Winter Seasonal Outlook Presentation

Departments: Clerk of the Board

(Dawn Johnson, National Weather Service (NWS) Reno) - Presentation by Dawn Johnson of the National Weather Service in Reno regarding the 2023/24 Winter Weather Outlook.

**Action:** None.

**Dawn Johnson, National Weather Service (NWS) Reno:**

- Presented item.

### B. Winter Operations Update - Caltrans

Departments: Clerk of the Board

(Ryan Dermody, District 9 Director, Terry Erlwein, Deputy District 9 Director for Maintenance, Operations, and Andy Richard, Caltrans Maintenance Manager) - Presentation by Ryan Dermody, Terry Erlwein, and Andy Richard of Caltrans regarding the 2023 - 24 Winter Operations update.

**Action:** None.

**Ryan Dermody, District 9 Director:**

- Presented item.

**Terry Erlwein, Deputy District 9 Director:**

- Presented item.

**Joshua Luadquisa, Caltrans Maintenance Area Superintendent:**

- Presented item.

**Public Comment:**

**Sarah Walsh:**

- Discussed the closure of highway 158 and the impact of the closure on the local businesses.

**Wendy Sugimura, Community Development Director:**

- Clarified signage update.

*Break: 10: 40 AM*

*Reconvened: 10:58 AM*

### C. 2023 Winter Storm Response and 2024 Winter Preparedness

Departments: Emergency Management

(Chris Mokracek, Director of Emergency Management) - Presentation by Chris Mokracek regarding the County's response to the 2023 winter storms and 2024

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

Winter preparedness.

**Action:** None.

**Chris Mokracek, Director of Emergency Management:**

- Presented item.

#### **D. Update from The Ferguson Group on Mono County Advocacy Services**

Departments: County Administrative Office

(Kristi More, TFG (The Ferguson Group)) - The Ferguson Group, LLC (TFG) is under contract with Mono County to provide federal advocacy, consulting, and grant services. Additionally, TFG works with staff to identify funding opportunities for the County's high-priority projects and works to assist the County in implementing the federal legislative platform and strategy. TFG will provide an update on their work with the County and the potential federal government shutdown.

**Action:** None.

**Kristi More, TFG (The Ferguson Group):**

- Presented item.
- Introduced Jeremiah Van Auken.

#### **E. Mono County Jail Facility - Update**

Departments: Public Works

(Paul Roten, Public Works Director) - Presentation by Public Works Director, Paul Roten regarding the progress in constructing a new Mono County Jail on Twin Lakes Road in Bridgeport.

**Action:** None.

**Paul Roten, Public Works Director:**

- Presented item.

**Stacey Simon, County Counsel:**

- Announced that we are moving to Closed Session, we will reconvene with Item #9a, and then move onto Item #7f.

Moved to Closed Session.

#### **F. Capital Improvement Plan Workshop**

Departments: Public Works

(Paul Roten, Public Works Director) - Workshop for presenting the list of projects on the proposed Mono County 2023 Capital Improvement Plan (CIP) and discuss the programming of available financial resources.

**Action:** None.

**Paul Roten, Public Works Director:**

- Presented item.

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors

## **G. 2024 Calendar of Meetings of the Board of Supervisors**

Departments: Clerk of the Board

(Queenie Barnard, Clerk-Recorder-Registrar-Clerk of the Board of Supervisors)  
- Rule 3 of the Mono County Board Rules of Procedure specifies that an annual calendar of meetings shall be adopted by the Board at its first meeting in January. These Rules are intended to expedite the transaction of business of the Board in an orderly fashion, and are deemed to be procedural only, therefore the Board can adopt the calendar before the first meeting in January. The failure to strictly observe the application of the Rules shall not affect the jurisdiction of the Board or invalidate any action taken at a meeting that is otherwise held in conformity with the law. The calendar will include all known regular meetings. Any meeting may be canceled upon the order of the Chair or by a majority of Board members.

**Action:** Approved calendar of meetings for 2024, with the cancellation of January 2, February 13, July 16, and November 19.

**Kreitz moved; Peters seconded**

**Vote: 5 Yes, 0 No**

**M23-256**

**Queenie Barnard, Clerk-Recorder-Registrar-Clerk of the Board of Supervisors:**

- Presented item.

## **H. Appointment of 2024 Rural County Representatives of California (RCRC) Delegate and Alternates**

Departments: Clerk of the Board

(Queenie Barnard, Clerk-Recorder-Registrar-Clerk of the Board of Supervisors)  
- The Mono County Board of Supervisors must appoint a Delegate and Alternate(s) to serve on the Rural County Representatives of California (RCRC) Board of Directors, Golden State Finance Authority (GSFA) Board of Directors, Golden State Connect Authority (GSCA) Board of Directors, and Environmental Services Joint Powers Authority (ESJPA) Board of Directors for 2024. Supervisor Duggan is currently the 2023 RCRC, GSFA, GSCA, and ESJPA Delegate. Supervisor Peters is currently the 2023 RCRC, GSFA, GSCA, and ESJPA First Alternate. Previously, the Solid Waste Superintendent was the 2023 RCRC, ESJPA Second Alternate.

**Action:** 1) Appointed Supervisor Duggan as the 2024 RCRC, GSFA, GSCA, and ESJPA Delegate; and 2) Appointed a Supervisor Salcido as the 2024 RCRC, GSFA, GSCA, and Supervisor Duggan as the ESJPA First Alternate; and 3) Appointed Chad Senior as the 2024 RCRC ESJPA Second Alternate.

**Peters moved; Kreitz seconded**

**Vote: 5 Yes, 0 No**

**M23-257**

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**Queenie Barnard, Clerk-Recorder-Registrar-Clerk of the Board of Supervisors:**

- Presented item.

**I. 2023/2024 California State Association of Counties (CSAC) Nominations**

Departments: Board of Supervisors

(Queenie Barnard, Clerk – Recorder – Registrar – Clerk of the Board of Supervisors) - Nomination of a member and alternate to serve on the California State Association of Counties (CSAC) Board of Directors for 2023/2024.

Appointment of individuals nominated by the Board is made by the CSAC Executive Committee and appointments are for one year. Supervisor Peters is currently the member and Supervisor Kreitz is currently the alternate.

**Action:** Nominated Supervisor Peters of the Board of Supervisors to serve on the CSAC Board of Directors for the 2023/2024 Association year beginning on November 13, 2023; also, nominated Supervisor Kreitz as the alternate member.

**Salcido moved; Gardner seconded**

**Vote: 5 Yes, 0 No**

**M23-258**

**Queenie Barnard, Clerk – Recorder – Registrar – Clerk of the Board of Supervisors:**

- Presented item.

**Supervisor Salcido:**

- Nominated Supervisor Peters as member and Kreitz as alternate member.

**J. Terms and Conditions of Employment for Thomas Boo, MD as Public Health Officer**

Departments: Health and Human Services

(Kathryn Peterson, Health, and Human Services Director) - The County has selected Thomas Boo, MD to serve as the permanent Public Health Officer for Mono County. Board approval is sought to confirm proposed terms and conditions of employment with a starting date of November 7, 2023.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**Action:** Announced fiscal impact and adopted Resolution R23-098, Approving Agreement Regarding Terms and Conditions of Employment for Thomas Boo, MD as Public Health Officer.

**Fiscal Impact:** The cost of this position for the remainder of Fiscal Year (FY) 2023-24 is \$123,005, of which \$86,046 is salary and \$36,959 is benefits. If this item is approved, the annual cost will be \$188,126, of which \$131,600 is salary and \$56,526 is benefits. The fiscal impact of this item is included in the Health and Human Services FY 2023-24 adopted budget.

**Gardner moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-098**

**Kathryn Peterson, Health, and Human Services Director:**

- Presented item.

Moved to Item #9b.

## 8. CLOSED SESSION

*Closed Session: 12:07 PM*

*Reconvened: 1:39 PM*

**Chair Duggan:**

- Item d. - Directed staff to explore other uses for the property that meet our priorities that could include housing.
- Item e. – Directed staff to move forward with the Chapter 7 Public Sale and not pursue the purchase of property at 15 White Mountain Drive, Chalfant CA 93512.

**Stacey Simon, County Counsel:**

- Clarification on Item e. sale will not move forward tomorrow due to a missed deadline for deposit therefore sale will be moved forward to February.

Moved to Item #9a.

### A. Closed Session - Labor Negotiations

CONFERENCE WITH LABOR NEGOTIATORS. Government Code Section 54957.6. Agency designated representative(s): Sandra Moberly, Mary Booher, Stacey Simon, Janet Dutcher, Jay Sloane, Christine Bouchard, and Oliver Yee. Employee Organization(s): Mono County Sheriff's Officers Association (aka Deputy Sheriff's Association), Local 39 - majority representative of Mono County Public Employees (MCPE) and Deputy Probation Officers Unit (DPOU), Mono County Paramedic Rescue Association (PARA), Mono County Correctional Deputy Sheriffs' Association. Unrepresented employees: All.

### B. Closed Session - Real Property Negotiation

CONFERENCE WITH REAL PROPERTY NEGOTIATORS. Government Code section 54956.8. Property Address: 264 Highway 182, Bridgeport, CA. County

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**



Negotiator: Mary Booher and Sandra Moberly. Negotiating Parties: Garth Moore and County of Mono. Under Negotiation: Price, terms, and conditions.

**C. Closed Session - Real Property Negotiation**

CONFERENCE WITH REAL PROPERTY NEGOTIATORS. Government Code section 54956.8. Property Address: 34 Kirkwood Street, Bridgeport, CA. County Negotiator: Mary Booher and Sandra Moberly. Negotiating Parties: Brianna Brown and County of Mono. Under Negotiation: Price, terms, and conditions.

**D. Closed Session – Real Property Negotiation**

CONFERENCE WITH REAL PROPERTY NEGOTIATORS. Government Code section 54956.8. Property APN: 37-050-06. Negotiating Parties: County of Mono and Mammoth Dog Teams. County Negotiators: Sandra Moberly, Paul Roten and Stacey Simon.

**E. Closed Session – Real Property Negotiation**

Closed Session – Real Property Negotiation – CONFERENCE WITH REALPROPERTY NEGOTIATOR. Government Code section 54956.8. Property Address: 15 White Mountain Drive, Chalfant CA 93512 County Negotiator: Sandra Moberly, Mary Booher Negotiating Parties: Mono County Treasurer/Tax Collector Under Negotiation: Price, terms, and conditions.

**F. Closed Session - Existing Litigation**

Closed Session – Existing Litigation - CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION. Paragraph (1) of subdivision (d) of Government Code section 54956.9. Name of case: Mono v. KR Property et al. Case number: CV200081

**G. Closed Session - Public Employee Evaluation**

PUBLIC EMPLOYEE PERFORMANCE EVALUATION. Government Code section 54957. Title: County Administrative Officer.

**9. REGULAR AGENDA - AFTERNOON**

**A. Housing Update**

Departments: County Administrative Office  
(Mary Booher, Retired Annuitant – Special Projects) - Presentation by Mary Booher providing an update on activities related to increasing housing in Mono County.

**Action:** None.

**Mary Booher, Retired Annuitant – Special Projects:**

- Presented item.

**Sandra Moberly, County Administrative Officer:**

- Offered to bring this item coming back for further discussion.

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors

**Public Comment:**

**Don Morton:**

- Discussed the June Lake project.

Moved to Item #7f.

**B. Request from Mammoth Lakes Housing for Funding for Access Apartments**

Departments: County Administrative Office

(Sandra Moberly, County Administrative Officer) - In 2017, Mammoth Lakes Housing (MLH) purchased a property at 238 Sierra Manor Road in Mammoth Lakes to provide additional affordable housing for the community. The proposed project includes converting the existing buildings into 11 one-bedroom apartments and six garages. MLH has secured a number of different funding sources for this project but, due to increasing construction costs of the project, has not secured full funding for the project. MLH is requesting additional funding for the project and has noted that there is a \$2.8M gap currently. The Housing Ad Hoc Committee discussed this project and recommended that the County allocate \$600,000 in funding in order to help close the gap for construction of the project.

**Action:** Approved to allocate the \$600,000 to the Ad Hoc Committee in order to help close the gap for construction of the project.

**Gardner moved; Salcido seconded**

**Vote: 4 Yes, 1 No**

**M23-260**

**Patricia Robertson, Mammoth Lakes Housing:**

- Presented item.

**Public Comment:**

**In person Mono Lake Room:**

1. Sandy Logan, resident:
  - support for the project
2. Paul McFarlan:
  - support for the project
3. Jake Supa:
  - support for the project
4. Elin Ljung:
  - support for the project
5. Contractor:
  - Discussed the engineering of the project.

**Vote:**

Chair Duggan: Y

Supervisor Gardner: Y

Supervisor Kreitz: Y

Supervisor Peters: N

Supervisor Salcido: Y

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

### **C. Clarification that Moratorium on Overnight Rentals for Duplex and Multi-Family Residential Units was not Approved**

Departments: Community Development

(Wendy Sugimura, Community Development Director) - Clarification that the moratorium on overnight rentals in multi-family residential units heard by the Board on Oct. 10, 2023, was not approved, because a 4/5 vote was needed, and 3 Board members voted in favor while 2 voted against. Opportunity for one of the three Board members who voted in favor of the moratorium to make a motion to reconsider the item now that it has been clarified that a 4/5 vote is required, as allowed by Board Rules of Procedure, Rule 30.

**Action:** Motion to reconsider (4/5 vote is required). Motion failed.

**Wendy Sugimura, Community Development Director:**

- Presented item.

Moved to Item 9e.

**Vote:**

Chair Duggan: N

Supervisor Gardner: Y

Supervisor Kreitz: N

Supervisor Peters: N

Supervisor Salcido: Y

Supervisor Kreitz left after this item.

### **D. Potential Moratorium on Overnight Rentals in Duplex and Multi-Family Units**

Departments: Community Development

(Wendy Sugimura, Community Development Director) - If motion to reconsider is adopted during prior item, consider proposed ordinance Temporarily Suspending New Short-Term and Transient Rentals of Duplex & Multi-Family Dwelling Units in All Land Use Designations except Commercial Lodging (CL).

**Action:** None, item pulled.

### **E. Policy Discussion on Residential Use of Recreational Vehicles (RVs)**

Departments: Community Development

(Wendy Sugimura, Community Development Director) - Presentation on policies and options regarding residential use of RVs in unincorporated Mono County.

**Action:** None, item tabled to 12/5 meeting.

**Public Comment:**

Elin Ljung:

**Note:**

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- Discussed the order of the housing items and suggested that the housing items be placed on the agenda earlier.

**Jake Suppa:**

- Discussed the possibility of provision options offered in the future.

**Supervisor Gardner:**

- Item tabled to the 12/5 meeting.

Moved to Adjournment.

## 10. BOARD MEMBER REPORTS

**Chair Duggan:**

- No report.

**Supervisor Gardner:**

- On Thursday Oct. 19 I participated in the regular meeting of the Eastern Sierra Council of Governments. Topics at that meeting included an update on regional air service in Bishop, a discussion about regional parks and athletic fields capacity, an update on the Community Economic Resiliency Fund (CERF), approval of the Comprehensive Economic Development Strategy (CEDs), and an update on Inyo Mono Broadband Consortium activities.
- Also, on Oct. 19 I participated in a meeting of the Financial Advisory Team which is part of the Eastern Sierra Climate and Community Resilience Project. We reviewed financial details and plans for the project.
- On Wednesday, Oct. 25 I attended a webinar about Mono Lake sponsored by the Southern California Water Dialogue.
- Also, on Oct. 25 I participated in a meeting of the Mono Basin RPAC. Topics at that meeting included the Regional Transportation Plan, and updates on the Pumice Valley Landfill and Conway Ranch.
- On Thursday, Oct. 26 I chaired the quarterly meeting of the Collaborative Planning Team. Topics at that meeting included a discussion about the use of RVs as residences and a presentation about the Regional Transportation Plan.
- On Oct. 27 I participated in a webinar with the Recreate Responsibly organization. This was an excellent review of ongoing responsible recreation activities across the nation and in California.
- Last Friday, Nov. 3, I participated in the monthly meeting of the Kutzadika Tribal Council. We discussed the status of the Tribe's Federal Recognition legislation in Congress.
- Yesterday I joined others in the region for the monthly meeting of the Eastern Sierra Sustainable Recreation Partnership. We reviewed several ongoing projects and got an update on the CERF status and ESCOG activities.
- Finally, last night I participated in the monthly meeting of the Mono Basin Housing Committee. We discussed the next steps in starting a Community Housing Trust.

**Supervisor Kreitz:**

- No report.

**Supervisor Peters:**

- No report.

**Supervisor Salcido:**

- October 17 - Joint meeting of Mono County Board of Supervisors and Mammoth Lakes Town Council. Items discussed included housing, EIFD and forest preservation funding.

**Note:**

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- October 18 - Town of Mammoth Lakes Council Meeting
- October 19 - ESCOG - received an update on winter regional air service. The new toilet is finally installed in Buttermilks.
- October 19 - ESCCRP Financial Advisory Team regarding the exploration of funding for forest preservation efforts and the work being advanced by White Bark and other agencies.
- October 20 - CERF Local Government Subcommittee
- October 27 - CERF - HRTC, High Road Transition Committee. Clarification of state guidance
- October 30 - CSAC Health and Human Services Policy Committee. Decision by group to take a “no position” on the upcoming ballot measure. Proposition 1 consists of proposed statutory changes to reform the state’s behavioral health system and create more supportive housing and behavioral health treatment resources.
- November 6 - ESSRP meeting with updates on agency activities.

**ADJOURNED at 3:57PM.**

**ATTEST**

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**RHONDA DUGGAN  
CHAIR OF THE BOARD**

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**DANIELLE PATRICK  
SENIOR DEPUTY CLERK OF THE BOARD**

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**



**DRAFT MEETING MINUTES  
BOARD OF SUPERVISORS, COUNTY OF MONO  
STATE OF CALIFORNIA**

Regular Meetings: First, Second, and Third Tuesday of each month. Location of meeting is specified below.

Meeting Location: Mono Lake Room, 1st Fl., County Civic Center, 1290 Tavern Rd., Mammoth Lakes, CA 93546

**Regular Meeting  
November 21, 2023**

**Backup Recording**

**Minute Orders**

**Resolutions-**

**Ordinance**

**Zoom**

**M23-261 – M23-268**

**R23-100 - R23- 104**

**ORD23-007 Used**

9:01 AM Meeting called to order by Chair Duggan.

*Supervisors Present: Duggan, Gardner, Kreitz, Salcido, and Peters. (All members were present in-person or participated via teleconference in compliance with rules established by the Ralph M. Brown Act).*

*Supervisors Absent: None.*

The Mono County Board of Supervisors stream most of their meetings live on the internet and archives them afterward. To search for a meeting from June 2, 2015, forward, please go to the following link: <http://www.monocounty.ca.gov/meetings>

Pledge of Allegiance led by Supervisor Kreitz.

**1. OPPORTUNITY FOR THE PUBLIC TO ADDRESS THE BOARD**

**Fred Stump:**

- Announced the passing of Mono County resident and Long Valley Fire Commissioner, Hank Brown. Also offer his condolences to Chair Duggan for the passing of her father.

**Supervisor Kreitz:**

- Requested to adjourn the 11/21 meeting in memory of Hank Brown and Hale Shipley.

**2. RECOGNITIONS**

**A. Proclamation Designating the Month of November 2023 as Native**

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

## **American Heritage Month**

Departments: Board of Supervisors

(Sandra Moberly, County Administrative Officer, and Supervisor Bob Gardner) - Proclamation recognizing November 2023 as Native American Heritage Month and consideration of inclusion of a land acknowledgement subject to review by the Board and local tribal members.

**Action:** Approved the proclamation recognizing November 2023 as Native American Heritage Month provide staff direction to work with the local tribes to finalize a land acknowledgment for inclusion on future Board agendas.

**Gardner moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

### **M23-261**

**Sandra Moberly, County Administrative Officer:**

- Introduced item.

**Supervisor Gardner:**

- Read the proclamation.

**Public Comment:**

**Charlotte Lang, Mono Lake Kutzadika Tribal Counsel:**

- Discussed land acknowledgement, the honor of recognition, and the challenges of acquiring the once native land.

**Fred Stump:**

- Thanked Supervisor Gardner for the recognition.

**Supervisor Salcido:**

- Thanked Charlotte for her work in the Native community.

**Supervisor Peters:**

- Discussed the land acknowledgement.

## **3. COUNTY ADMINISTRATIVE OFFICER**

**Sandra Moberly, County Administrative Officer:**

- Thanked the County staff for their commitment to public service.

## **4. DEPARTMENT/COMMISSION REPORTS**

No one spoke.

## **5. CONSENT AGENDA**

(All matters on the consent agenda are to be approved on one motion unless a board member requests separate action on a specific item.)

### **A. Board Minutes**

Departments: Clerk of the Board

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors

Approval of Board minutes from the September 2023, regular meetings.

**Action:** 1. Approved the Board minutes from the September 5, 2023, regular meeting. 2. Approved the Board minutes from the September 12, 2023, regular meeting.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-262**

## **B. Termination of Emergency Declarations - 2022/23 Winter Storms**

Departments: Emergency Management

Termination of local declarations of emergency related to 2023 severe winter storms proclaimed on January 10 and February 28, by the Mono County Emergency Services Director and ratified by the Board of Supervisors on January 17, and March 7, respectively (last review date: October 3, 2023).

**Action:** Terminated the local declarations of emergency ratified on January 17 and March 7, 2023, related to severe winter storms.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-263**

## **C. Appointment to the Wheeler Crest Design Review Committee**

Departments: Community Development

Consider appointing Meredith Frolio as a new member to the Wheeler Crest Design Review Committee.

**Action:** Appointed Meredith Frolio to a two-year term expiring 11/30/25 on the Wheeler Crest Design Review Committee.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-264**

## **D. County Surveyor Appointment and Contract for Services**

Departments: Public Works

Proposed contract with Lumos & Associates pertaining to County Surveyor. Assignment of Richard Byrem as County Surveyor.

**Action:** 1. Approved and signed a contract with Lumos & Associates for County Surveyor services for the period July 1, 2023, through June 30, 2026, and a not-to-exceed amount of \$225,000, and not to exceed \$75,000 in any twelve-month period. 2. Appointed Richard Byrem, PLS 9129, employed by Lumos &

**Note:**

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Associates, as County Surveyor.  
**Peters moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-265**

**6. CORRESPONDENCE RECEIVED - NONE**

Direction may be given to staff regarding, and/or the Board may discuss, any item of correspondence listed on the agenda.

*Break: 9:28 AM*  
*Reconvened: 9:34 AM*

**7. REGULAR AGENDA - MORNING**

**A. Wildfire Mitigation Coordinator Update**

Departments: Emergency Management  
(Wendilyn Grasseschi, Wildfire Mitigation Coordinator) - Presentation by Wendilyn Grasseschi, Mono County Wildfire Mitigation Coordinator regarding an update on Wildfire Mitigation projects throughout Mono County.

**Action:** None.

**Wendilyn Grasseschi, Wildfire Mitigation Coordinator:**

- Presented item.

*Break: 10:34 AM*  
*Reconvened: 10:42 AM*

Moved to item #7c.

**B. California Interoperable Radio System (CRIS) Service Agreement and Site Licenses/Lease**

Departments: Emergency Management  
(Chris Mokracek, Director of Emergency Management) - Service Agreement with the California Office of Emergency Services, Public Safety Communications (CalOES/PSC) for CRIS Trunked Radio Service. Site lease/licenses with Mammoth Mountain Ski Area, June Mountain Ski Area, Antelope Valley Fire Protection District and Mammoth Lakes Fire Protection District pertaining to location of CRIS infrastructure on facilities owned by those entities.

**Action:** 1. Approved and authorized Chair to sign Service Contract with CalOES/PSC for CRIS Trunked Radio Service for the period September 12, 2023, through June 30, 2029, with automatic 5-year renewals thereafter unless canceled upon 180-days' notice. The contract cost is \$26 per primary CRIS subscriber per month, with offsets and reimbursement described under fiscal

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impact below. 2. Approved and authorized Chair to sign, site license agreements with: Mammoth Mountain Ski Area for space on Mammoth Mountain and June Mountain; Mammoth Lakes Fire Protection District for space at Station #1; and site lease with Antelope Valley Fire Protection District for space at its station on Larson Lane in Coleville, for the installation of CRIS system infrastructure. Licenses/Lease are for an initial term of ten-years, with two additional five-year terms, and a cost of \$10.00 per term, plus the amount of any increase in underlying permit fees from the Forest Service for the added land use on MMSA or June Mountain sites. Each lease/license includes a provision to sub-lease/license of each site to CalOES/PSC, which would also be approved by this action. Provided authority to staff to make minor changes to the proposed agreements and exhibits as needed, provided that the changes do not materially affect agreement terms and conditions and are approved as to form by County Counsel.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-266**

**Chris Mokracek, Director of Emergency Management:**

- Presented item.

Moved to item #7d.

### **C. Letter from United States Postal Service (USPS) regarding Bridgeport Post Office**

Departments: County Administrative Office

(Sandra Moberly, County Administrative Officer) - Discussion on the letter from United States Postal Service (USPS) regarding Bridgeport Post Office.

**Action:** None.

**Sandra Moberly, County Administrative Officer:**

- Introduced item.

**Supervisor Peters:**

- Provided background and current status of the Bridgeport Post Office.
- Conversation about the USPS Facilities not showing up for meetings, calls, and to visit the Bridgeport Post Office.

**Chelyssa Horvat, District Director for U.S. Congressman Kevin Kiley:**

- Introduced the USPS staff.
- Discussion on communicating all updates in a group email.
- Clarification on Building Permit.

**Russell Partee, USPS:**

- Provided update on Bridgeport Post Office and the lack of movement.

**Art Stilwell, USPS:**

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

- Update from USPS Facilities (landlord confirmed start of work this week and will take 3 - 4 weeks to complete and that the landlord has all necessary documents).

Moved back to item #7b.

#### **D. Chapter 8 Tax Sale**

Departments: Finance

(Janet Dutcher, Director of Finance) - Purchase Agreement and Resolution authorizing the purchase and sale of tax defaulted property: 350 Mule Deer Road, Walker CA 93517 (APN 002-370-001-000).

**Action:** None, tabled item until the 12/5 meeting.

**Janet Dutcher, Director of Finance:**

- Presented item.

**Supervisor Peters:**

- Requested to hear this item at the next board meeting due to emails that he has received regarding this property.
- Requested that staff send an email response.

**Gerald Frank, Treasure/Tax Collector:**

- Clarifies the date of redemption.

**Chris Beck, Assistant County Counsel:**

- Clarifies that there is not any deadline, and the item could be moved to a future meeting.

#### **E. Purchase of Property Located at 34 Kirkwood, Bridgeport, CA**

Departments: County Counsel

(Chris Beck, Assistant County Counsel) - Proposed agreement and resolution authorizing the purchase of the property located at 34 Kirkwood Street, Bridgeport, CA 93546.

**Action:** None, tabled item until 12/5 meeting.

**Chris Beck, Assistant County Counsel:**

- Requested to move to a future meeting.

#### **F. Creation of Smoke-free Multi Unit Housing Ad Hoc Committee**

Departments: Health and Human Services

(Lauren Kemmeter, Community Health Program Coordinator II and Kathryn Peterson, Health, and Human Services Director) - The formation of a Board of Supervisors Ad Hoc Committee is requested to provide staff direction to help shape a draft smoke-free multi-unit housing ordinance to be brought back to the Board for consideration. Policy maker input is essential to ensure that a smoke-

**Note:**

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free multi-unit housing policy is well-crafted, legally sound, and aligned with the interests and needs of the Mono County community.

**Action:** Appointed Supervisor Kreitz and Supervisor Salcido to the Board of Supervisors Ad Hoc Smoke-free Multi Unit Housing Committee to help shape a proposed ordinance to be brought back to the full Board for consideration.

**Salcido moved; Peters seconded**

**Vote: 5 Yes, 0 No**

**M23-267**

**Kathryn Peterson, Health, and Human Services Director:**

- Introduced item.

**Lauren Kemmeter, Community Health Program Coordinator II:**

- Presented item.

## **G. Terms and Conditions of Employment and Job Descriptions - Health and Human Services**

Departments: Health and Human Services

(Kathryn Peterson, Health and Human Services Director) - Board approval of four new at will position descriptions within the Health and Human Services (HHS) Department (Adult Services Manager; Program Manager-Eligibility; Health Program Manager; and Children's Services Manager), and approval of terms and conditions of employment reclassifying existing employees Francisca Avitia as at will Program Manager-Eligibility; Marjoree Neer as at will Health Program Manager; and, Michelle Raust as at will Children's Services Manager.

**Action:** Approved the following position descriptions: at will Adult Services Manager; at will Program Manager-Eligibility; at will Health Program Manager; and at will Children's Services Manager.

**Salcido moved; Kreitz seconded**

**Vote: 5 Yes, 0 No**

**M23-268**

**Action:** 1. Announced fiscal impact and adopted Resolution R23-100, Approving Agreements Regarding Terms and Conditions of Employment for Francisca Avitia as Program Manager-Eligibility, an at will position, at Range 14 Step E; 2. Announced fiscal impact and adopted Resolution R23-101, Approving Marjoree Neer as Health Program Manager, an at will position, at Range 14 Step E; and 3. Announced fiscal impact and adopted Resolution R23-102, Approving Michelle Raust as Children's Services Manager, an at will position, at Range 14 Step E.

**Fiscal Impact:** The cost of these positions for the remainder of the fiscal year 2023-24 is \$467,278, of which \$311,812 is salary and \$155,466 is benefits. If this item is approved, the annual cost will be \$714,661, of which \$476,890 is salary and \$237,771 is benefits. The fiscal impact of this item is included in the

**Note:**

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Health and Human Services Fiscal Year 2023-24 adopted budget.

**Salcido moved; Kreitz seconded**

**Vote: 5 Yes, 0 No**

**R23-100, R23-101, R23-102**

Moved to item #9.

## **8. CLOSED SESSION**

*Closed Session: 12:05 PM*

*Reconvened: 1:02 PM*

No action to report out of Closed Session.

Moved to Adjournment.

### **A. Closed Session - Labor Negotiations**

CONFERENCE WITH LABOR NEGOTIATORS. Government Code Section 54957.6. Agency designated representative(s): Sandra Moberly, Mary Booher, Stacey Simon, Janet Dutcher, Jay Sloane, Christine Bouchard, and Oliver Yee. Employee Organization(s): Mono County Sheriff's Officers Association (aka Deputy Sheriff's Association), Local 39 - majority representative of Mono County Public Employees (MCPE) and Deputy Probation Officers Unit (DPOU), Mono County Paramedic Rescue Association (PARA), Mono County Correctional Deputy Sheriffs' Association. Unrepresented employees: All.

### **B. Closed Session - Real Property Negotiation**

Closed Session – Real Property Negotiation – CONFERENCE WITH REAL PROPERTY NEGOTIATORS. Government Code section 54956.8. Property Address: 264 Highway 182, Bridgeport, CA. County Negotiator: Mary Booher. Negotiating Parties: Garth Moore and Mono County. Under Negotiation: Price, terms, and conditions.

### **C. Closed Session - Public Employee Evaluation**

PUBLIC EMPLOYEE PERFORMANCE EVALUATION. Government Code section 54957. Title: County Administrative Officer.

## **9. BOARD MEMBER REPORTS**

**Chair Duggan:**

- 10/17 –County/Town Joint Meeting  
I proceeded over the joint meeting of the TOML and Mono County. Informational items included discussion of housing funding options and emergency response overview from last winter. County staff will bring back items for discussion at future meetings.
- 10/19 – RCRC ESJPA, ILG Special Board Meeting  
I attended via zoom in the Environmental Services Joint Powers Authority meeting.

**Note:**

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- I participated in a Special Board Meeting for the Institute for Local Government detailing the new Apprenticeship Program and Grant for 2024-2026.
- 10/24 – CSA1  
I attended the monthly Community Services District 1 meeting where trail programs and upcoming community projects were reviewed. Many community events are coming up, including the Crowley Lake Holiday Tree Lighting on December 3 at the Community Center.
  - 10/25 – TVGMD  
I attended the Tri Valley Groundwater Management District meeting in Chalfant. Well monitoring options and reports were presented.
  - 10/26 – RCRC Legislative Update  
Participated in the monthly Legislative Update with focus on upcoming legislation around solid waste compliance, water quality and EV grants and compliance.
  - 11/2 – GBUAPCD  
I participated with Supervisor Salcido in the bimonthly meeting. Noted were the effects of last winter's storms on both Mono Lake and Owens Lake.
  - 11/3 – ILG Qtr 4 Board Meeting, WMFPD  
I participated in ILG Board meeting in preparation for the Executive Director's presentation at CSAC  
I accompanied CAO Moberly to Benton to meet with the White Mountain Fire Protection District and viewed a presentation on EMS funding.
  - 11/8 – EELU  
I participated in the NACo Environment, Energy, and Land Use Policy Steering Committee. We saw a presentation on Regional Clean Hydrogen Hubs program and reviewed current legislation of concern.
  - 11/13 – LTC  
I participated in the Local Transportation Commission meeting with Supervisor Kreitz where we approved the FY 23-24 Overall Work Program, the Regional Transportation Improvement Plan (RTIP), and heard presentations from our transportation partners.
  - 11/13-11/17 CSAC Annual Conference  
I attended the CSAC Annual Conference in Oakland with many of my colleagues and County staff. A workshop on the Fire Insurance Crisis provided some insights but few solutions. Work for viable and affordable solutions continues.

**Supervisor Gardner:**

- No report.

**Supervisor Kreitz:**

- October 18 & 19th – I participated in the IMACA Board retreat and strategic planning session. The Agency is still working through the massive changes that began last year. The Board updated both the vision and mission statement and worked through the strategic planning process.
- October 18th – I attended the Town of Mammoth Lakes Town Council meeting. At this meeting the Council approved with a 4/5 vote a 45-day moratorium on nightly rentals in the town's RMF2 zone.
- October 27th – I attended the Eastern Sierra HRTC meeting, the group received an update the proposed five sector priority areas and next steps. The application for catalyst funds (\$14mm) is due November 30th.
- November 2nd – IMACA Board meeting. IMACA is seeking a Board member from Mono County to represent the low-income sector. The nominee need not be low-income themselves but shall have thorough knowledge and understanding of the causes of poverty and needs of low-income individuals. The nominee must work or live in Mono County. For more information of a candidate interest packet, please contact

**Note:**

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Stephanie Nelligan at 760-873-8557 or snelligan@imaca.net. The Board approved a resolution authorizing the ED to work with Amador Tuolumne Community Action Agency to support and distribute IMACA's LIHEAP and weatherization assistance program.

- November 6th – CSAC Housing Land-use Transportation committee chairs and CSAC staff met to prepare for the upcoming CSAC annual conference next week. The guest speaker during the committee meeting at the conference will be the director of the California Department of Housing and Community Development, Gustavo Velasquez.
- November 6, 2023 - MLH Board meeting. MLH used CalHome funds to provide a \$100,000 down payment assistance loan to a Coleville family to purchase a home in Coleville.
- November 8, 2023 – The NACo Community Economic Workforce Development monthly meeting call.
- November 13, 2023 – The Mono County Local Transportation Commission met. The Commission adopted a resolution approving the allocation of the roughly \$9.2 million Regional Transportation Improvement Program funding allocation which will be taken back to the State for approval. Funding includes construction funds for the Multi-Use Path from Old Mammoth Road to Lake Mary Road as well as funding for the planning design work in installing a round-about at the Meridian and Minaret Roads. Construction is proposed for 2025/26 and the planning for the round-about in 2024/25.
- November 13, I also participated in the Eastern Sierra Continuum of Care Board meeting. Board member Nichole Williamson submitted her resignation from the board due to a lack of time to commit to the Board due to her work demands as CAO of Alpine County. We received an update on the HHAP rounds 1 & 2 funds that are still with IMACA. The COC, IMACA & the State are working on the next steps to get the remaining funds to the new collaborative applicant for the COC, Inyo County. The Board considered an MOU with Stanislaus Regional Housing Authority for the implementation of the Emergency Housing Choice Vouchers. The board has requested that the HA attend the next COC meeting with a presentation on how the process will work.
- Funding news: Bridgeport Indian Colony received an award for Tribal Homeless Housing, Assistance and Prevention (Tribal HHAP) grant program for \$509,293.76. They will have to complete the contract and have until June 30, 2027, to spend the monies.
- Bishop Paiute Tribe is one of the 17 eligible tribal entities for HDAP funding for \$100,000. This includes a 1:1 match requirement.
- November 14-17th I was in Oakland for the California State Association of Counties annual conference. The Housing Land-Use Transportation (HLT) Committee held a meeting during the conference. HCD Director Gustavo Velasquez made a presentation to the committee. Some highlights from his presentation include California needs 2.5 million new housing units by 2030, 1.2 million of those are needed for low- and moderate-income households; California is home to 171,000 homeless people with ¾ of those are unsheltered; the average cost of a new unit costs for an affordable housing unit of a 1-2 bedroom is \$609,000; a person needs to earn \$41/hour to afford the median housing unit. Governor Newsom's priorities around housing are homelessness, interconnection between housing & environment, and equity.

**Supervisor Peters:**

- Reminder of the 3<sup>rd</sup> Anniversary of the MVF.
- Attended the CSAC Conference.
  - Discussed the homeowner insurance issues (cancellations and increased fees).

**Note:**

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**Supervisor Salcido:**

- On November 9th, I toured the Owens Lakes with Phill Kiddoo of the Great Basin Unified Air Quality Control District.
- The week of November 13th I attended the CSAC yearly conference in Oakland. One session of particular interest was the CSAC Women's Leadership Forum Workshop "Investing in the Economic Empowerment of Women and Girls".

**ADJOURNED at 1:03 PM in memory of Hank Brown and Hale Shipley.**

**ATTEST**

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**RHONDA DUGGAN  
CHAIR OF THE BOARD**

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**DANIELLE PATRICK  
SENIOR DEPUTY CLERK OF THE BOARD**





**DRAFT MEETING MINUTES  
BOARD OF SUPERVISORS, COUNTY OF MONO  
STATE OF CALIFORNIA**

Regular Meetings: First, Second, and Third Tuesday of each month. Location of meeting is specified below.

Meeting Location: Board Chambers, 2nd Fl., County Courthouse, 278 Main St., Bridgeport, CA 93517

**Regular Meeting  
December 5, 2023**

**Backup Recording**

**Minute Orders**

**Resolutions-  
Ordinance**

**Zoom**

**M23-269 – M23-278**

**R23-103 - R23- 108**

**ORD23-007 Used**

9:03 AM Meeting called to order by Chair Duggan.

*Supervisors Present: Duggan, Gardner, Kreitz, Salcido, and Peters. (All members were present in-person or participated via teleconference in compliance with rules established by the Ralph M. Brown Act).*

*Supervisors Absent: None.*

The Mono County Board of Supervisors stream most of their meetings live on the internet and archives them afterward. To search for a meeting from June 2, 2015, forward, please go to the following link: <http://www.monocounty.ca.gov/meetings>

Pledge of Allegiance led by Supervisor Kreitz.

**1. OPPORTUNITY FOR THE PUBLIC TO ADDRESS THE BOARD**

**Sarah Walsh:**

- Introduced herself as a candidate running for Supervisor for District 3 and is a business owner in June Lake.

**2. RECOGNITIONS - NONE**

**3. COUNTY ADMINISTRATIVE OFFICER**

**Sandra Moberly, County Administrative Officer:**

**Note:**

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- Attended the CSA meeting in Crowley Lake and attended the Tree lighting ceremony.
- Public Defender, Victoria Cambell starts on Monday.

#### **4. DEPARTMENT/COMMISSION REPORTS**

**Paul Roten, Public Works Director:**

- Update on Solid Waste Program, Fleet Program, Facilities, and Roads.
- Discussed the priority of the current projects.

**Stacey Simon, County Counsel:**

- Clarifies per Brown Act that all questions must be clarifying questions and not a discussion.

**Supervisor Gardner**

- Requested an update on all County roads of concern.

**Supervisor Peters:**

- Inquired about Virginia Lakes Road plowing.
- Requested that the future item includes the enforcement of parking.

**Wendy Sugimura, Community Development Director:**

- Update on the Short-term rental study.
- Discussion on the survey done by County staff.
- Housing laws update.
- Planning Commission meeting update.
- Heads up on the General Plan Amendment Application in January.
- Planning on bringing back a workshop on the new laws if the Board is interested.

**Supervisor Salcido:**

- Requested clarity on the new laws that the Board should be aware of for Mono County.

**Kathy Peterson, Health, Human, Services Director:**

- Discussed emergency preparedness.
- Reminder on Medi-Cal redetermination.
- Update on flu vaccine clinics.
- Discussed the need for Foster Families.

#### **5. CONSENT AGENDA**

(All matters on the consent agenda are to be approved on one motion unless a board member requests separate action on a specific item.)

##### **A. Board Minutes**

Departments: Clerk of the Board

1. Approval of Board minutes from the October 2023, regular meetings. Approval of Board minutes from the October 2023, special meeting.
2. Approval of Board

**Note:**

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minutes from the November 2023, regular meetings.

**Action:** 1. Approved the Board minutes from October 3, 2023, regular meeting. 2. Approve the Board minutes from October 10, 2023, regular meeting. 3. Approved the Board minutes from October 17, 2023, regular meeting. 4. Approved the Board minutes from October 17, 2023, special meeting. Approved the Board minutes from the November 5, 2023, regular meeting.

**Kreitz moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-269**

## **B. Monthly Treasury Transaction Report**

Departments: Finance

Treasury Transaction Report for the month ending 10/31/2023.

**Action:** Approved the Treasury Transaction Report for the month ending 10/31/2023.

**Kreitz moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-270**

## **C. Microsoft Office 365 Enterprise Agreement Renewal**

Departments: Information Technology

Proposed contract with Microsoft pertaining to our Enterprise Agreement renewal under which the County purchases a variety of software products including Office 365.

**Action:** Approved and authorized Board Chair to sign contract with Microsoft for the Riverside County Master Agreement (Microsoft Enterprise Agreement) for the period December 1, 2023, through November 30, 2026, and a not-to-exceed amount of \$300,000.

**Kreitz moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-271**

## **D. Resolution Authorizing Amendment of the Mono County Allocation List -- Sheriff's Office**

Departments: Sheriff's Office

Proposed resolution of the Mono County Board of Supervisors authorizing the County Administrative Officer to amend the County of Mono list of allocated

**Note:**

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positions to eliminate one Fiscal Technical Specialist I/II/III and add one Fiscal Technical Specialist IV in the Office of the Sheriff.

**Action:** Adopted Resolution R23-103, Authorizing the County Administrative Officer to amend the County of Mono list of allocated positions to eliminate one Fiscal Technical Specialist I/II/III and add one Fiscal Technical Specialist IV in the Office of the Sheriff.

**Kreitz moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-103**

#### **E. Public Works - Parks and Facilities Supervisor**

Departments: Public Works - Facilities

Eric Eilts is being recommended for promotion from Craftworker Step E to a Parks and Facilities Supervisor Step C.

**Action:** Authorized the promotion of existing employee Eric Eilts from Craftworker Step E to a Parks and Facilities Supervisor Step C.

**Kreitz moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-272**

#### **F. Consolidation of Elections - Mammoth Unified School District**

Departments: Elections

Consolidation of School Bond Election of the Mammoth Unified School District with the Statewide Primary Election on March 5, 2024, and direction to the Mono County Elections Division to conduct the election and canvass the returns.

**Action:** Adopted Resolution R23-104, Consolidating the School Bond Election called by the Mammoth Unified School District for the Purpose of Submitting to the Voters of the District a measure entitled "Mammoth Unified School District Educator Housing and School Safety and Renovation Measure".

**Kreitz moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-104**

#### **G. Cancellation of December 19, 2023, Regular Meeting of the Board of Supervisors**

Departments: County Administrative Office

Cancellation of the December 19, 2023, Board of Supervisors regular meeting.

**Action:** Approved the cancellation of the December 19, 2023, Board of Supervisors regular meeting.

**Note:**

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**Kreitz moved; Salcido seconded**  
**Vote: 5 Yes, 0 No**  
**M23-273**

## **6. CORRESPONDENCE RECEIVED**

Direction may be given to staff regarding, and/or the Board may discuss, any item of correspondence listed on the agenda.

### **A. Caltrans Clean California Agreement Update**

Correspondence from Marcella Rose, Sustainable Recreation Coordinator regarding an update on the Caltrans Clean California agreement.

## **7. REGULAR AGENDA - MORNING**

### **A. Letter from United States Postal Service (USPS) regarding Bridgeport Post Office**

Departments: County Administrative Office

(Sandra Moberly, County Administrative Officer) - Discussion on the letter from United States Postal Service (USPS) regarding Bridgeport Post Office.

**Action:** None.

#### **Sandra Moberly, County Administrative Officer:**

- Provided an update regarding the current status of the Post Office.
- USPS has no interest in occupying a temporary building and will remain in the mobile units until the landlord finished the repairs.
- Anticipated completed repairs to be done by the end of December.

#### **Supervisor Peters:**

- Discussion on the contractor and permits.
- Would like to continue to advocate for the USPS Facilities staff coming to Bridgeport (since they have not come yet).

#### **Wendy Sugimura, Community Development Director:**

- Provided an update on the permits and scope of work.

#### **Chair Duggan:**

- Discussion on the mailboxes and adequacy.

#### **Supervisor Gardner:**

- There needs to be a call to the USPS every week (the County and Kiley's Office).

#### **Supervisor Salcido:**

- Requested the contact information of USPS Facilities.
- Discussed the urgency due to checks and medication being delivered via mail.

#### **Note:**

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**Stacey Simon, County Counsel:**

- Confirms that a phone call campaign can be made by all Supervisors.
- Made suggested impacts on the County.

**Sandra Moberly**

- Suggested writing another letter in addition to the phone call campaign.

**Supervisor Kreitz:**

- Suggested including the Bridgeport Chambers.

**B. Input to the Inyo National Forest and Bureau of Land Management Regarding Proposed Wild Horse Gathering**

Departments: County Administrative Office

(Sandra Moberly, County Administrative Officer) - Input to the Inyo National Forest (Inyo) and Bureau of Land Management (BLM) regarding proposed wild horse gathering.

**Action:** Approved, and authorized Chair to sign, proposed comment letter to Inyo and the BLM regarding wild horse gathering.

**Gardner moved; Peters seconded**

**Vote: 5 Yes, 0 No**

**M23-274**

**Sandra Moberly, County Administrative Officer:**

- Introduced item.

**Supervisor Gardner:**

- Provided background and presented item.

**C. United States Department of Agriculture (USDA) Rural Development Broadband Technical Assistance Grant for Hammil Valley Last-Mile Network Design**

Departments: Board of Supervisors, Sponsored by Supervisor Gardner

(Scott Armstrong, Regional Broadband Coordinator) - To discuss the United States Department of Agriculture (USDA) Rural Development (RD) Broadband Technical Assistance (BTA) Grant Award for Last-Mile Network Design in Hammil Valley, California.

**Action:** Approved the USDA RD BTA Grant Award, approved the Grant agreements, and authorized the County Administrator to sign the appropriate USDA RD grant forms and agreements.

**Gardner moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**M23-275**

**Note:**

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**Scott Armstrong, Regional Broadband Coordinator:**

- Presented item.

*Break: 10:04 AM*

*Reconvened: 10:17 AM*

**D. Inyo Mono Advocates for Community Action (IMACA) Update**

Departments: Clerk of the Board

(Kelly Barceloux, IMACA Executive Director) - Update from Kelly Barceloux, IMACA Executive Director.

**Action:** None.

**Kelly Barceloux, IMACA Executive Director:**

- Presented item.

Moved to Item #7k.

**E. Review and Declaration of November 7, 2023, Special District Election Results**

Departments: Elections

(Queenie Barnard, Registrar of Voters) - Presentation of certified election results of the November 7, 2023, Special District Election for the Tri-Valley Groundwater Management District.

**Action:** Accepted certified statement of results of the November 7, 2023, Special District Election, and declare elected to the Tri-Valley Groundwater Management District Director office the following candidate who received the highest number of votes: Donald Moss.

**Gardner moved; Kreitz seconded**

**Vote: 5 Yes, 0 No**

**M23-276**

**Queenie Barnard, Registrar of Voters:**

- Presented item.

**F. Terms and Conditions of Employment - Assistant Clerk-Recorder**

Departments: Clerk / Recorder / Registrar / Clerk of the Board of Supervisors

(Queenie Barnard, Clerk-Recorder-Registrar-Clerk of the Board of Supervisors) - Proposed resolution approving agreement regarding terms and conditions of employment with Salinthia Ybarra as Assistant Clerk-Recorder.

**Action:** Announced Fiscal Impact. Adopted Resolution R23-105, Approving agreement regarding terms and conditions of employment with Salinthia Ybarra

**Note:**

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as Assistant Clerk-Recorder. Authorized the Board Chair to execute said contract on behalf of the County.

**Fiscal Impact:** The estimated cost of this position for the remainder of the fiscal year is \$59,070, of which \$47,605 is salary and \$11,465 is benefits. The total cost of salary and benefits for an entire fiscal year is approximately \$94,884, of which \$83,538 is salary and \$11,346 is benefits. This is included in the Department's FY 2023/24 approved budget.

**Salcido moved; Gardner seconded**

**Vote: 5 Yes, 0 No**

**R23-105**

**Queenie Barnard, Clerk-Recorder-Registrar-Clerk of the Board of Supervisors:**

- Presented item.

## **G. Property Tax Sharing Agreement - Snowcreek VIII, Mammoth Lakes**

Departments: County Administrative Office

(Sandra Moberly, County Administrative Officer) - Proposed resolution Approving a Property Tax Sharing Agreement Related to the Annexation by Mammoth Community Water District (MCWD) of Properties Proposed for Development as "Snowcreek VIII".

**Action:** Adopted Resolution R23-106, Approving and authorizing the Chair to sign, property tax sharing agreement with Mammoth Community Water District for the purpose of sharing a portion of the property tax increment which would otherwise be received by the County within tax rate areas 010-011, 010-014, and 010-015 with MCWD.

**Salcido moved; Peters seconded**

**Vote: 5 Yes, 0 No**

**R23-106**

**Sandra Moberly, County Administrative Officer:**

- Introduced item.

**Mary Booher, Mono County Special Projects:**

- Presented item.

**Janet Dutcher, Finance Director:**

- Discussed the values and composite rate.

**Stacey Simon, County Counsel:**

- Clarifying discussion on the responsibility of the Board to determine the amount of property taxes to be shared with special districts.

## **H. Policy Discussion on Residential Use of Recreational Vehicles (RVs)**

Departments: Community Development

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors



(Wendy Sugimura, Community Development Director) - Presentation on policies and options regarding residential use of RV in unincorporated Mono County.

**Action:** None.

**Wendy Sugimura, Community Development Director:**

- Provided background and presented item.
- Clarifies the 2-acre lot size requirement.

**Supervisor Gardner:**

- In support of Wendy's recommendations.
- Requested to have a safe park project.

**Public Comment:**

**Paul McFarlin, Lee Vining resident:**

- Discussion on private homeowners having an additional unit on their property such as an RV.

**Sarah Walsh:**

- In support of the Accessory Dwelling Unit's.
- Discussion on considering June Lake RV Park that is open all year as an option to provide housing for the County.

**Jake Suppa:**

- Discussion on safe park area.
- Suggested moving to Ordinances (since Ordinances can be altered by the Board) and utilizing residents with private property.
- Discussion on the 2-acre lot size requirement.

**Supervisor Kreitz:**

- Discussion on her opposition of lot size requirement
- In support of a Safe Parking Project.

**Supervisor Peters:**

- Discussion on current RV spaces that are available in the County (suggested hiring a consultant to obtain this information).
- Discussion on the use of RV to be allowed on mixed use or commercial property for employee housing.

**Supervisor Salcido:**

- Discussion on path moving forward and assigning responsibilities.

**Chair Duggan:**

- In support of the exploration of individual agencies or private businesses to use the property.
- Discussion on the "test project" in Colorado and how it relates to Mono County.
- Agrees with reducing the acreage needed.

## I. Chapter 8 Tax Sale

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors

Departments: Finance

(Janet Dutcher, Director of Finance) - Purchase Agreement and Resolution authorizing the purchase and sale of tax defaulted property: 350 Mule Deer Road, Walker CA 93517 (APN 002-370-001-000).

**Action:** 1. Adopted Resolution R22-107, Authorizing the Purchase and sale of tax defaulted property and finding that the purchase is exempt from the California Environmental Quality Act pursuant to CEQA Guidelines Sections 15061(b)(3) (Common Sense Exemption), 15301 (Class 1 - Existing Facilities), 15302 (Class 2 - Replacement or Reconstruction), and 15303 (Class 3 - New Construction or Conversion of Small Structures). 2. Approved Purchase Agreement for tax defaulted property.

**Peters moved; Kreitz seconded**

**Vote: 5 Yes, 0 No**

**R23-107**

**Janet Dutcher, Director of Finance:**

- Presented item.

#### **J. Purchase of Property Located at 34 Kirkwood, Bridgeport, CA**

Departments: County Counsel

(Chris Beck, Assistant County Counsel) - Proposed agreement and resolution authorizing the purchase of the property located at 34 Kirkwood Street, Bridgeport, CA 93546.

**Action:** 1. Adopted Resolution R23-108, Authorizing the purchase of the property located at 34 Kirkwood Street, Bridgeport, CA 93546 and finding that the purchase is exempt from the California Environmental Quality Act pursuant to CEQA Guidelines Sections 15061(b)(3) (Common Sense Exemption) and CEQA Guidelines Section 15303 (New Construction or Conversion of Small Structures). 2. Approved Purchase Agreement.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-108**

**Chris Beck, Assistant County Counsel:**

- Presented item.

Moved to Item #7m.

#### **K. Public Works Related Supervision**

Departments: Public Works

(Paul Roten, Public Works Director) - Mono County Personnel Rule 150 (F)(10)

**Note:**

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requires Board approval (by a 4/5ths vote) of any decision to hire, or employee transfer, which would result in the employee being supervised by a person who is a relative by blood or marriage. Public Works is seeking Board approval to transfer a current Road Division employee to District 2, where the employee would then be under the supervision of a person who is his second cousin.

**Action:** Approved Aaron Dondero to be supervised by his second Cousin Lucio Gonzales in the Roads Division, District 2. (4/5 vote required.)

**Peters moved; Gardner seconded**

**Vote: 5 Yes, 0 No**

**M23-277**

**Paul Roten, Public Works Director:**

- Presented item.

#### **L. Mono County Jail Facility Update**

Departments: Public Works

(Paul Roten, Public Works Director) - Presentation by Public Works Director, Paul Roten regarding the progress in constructing a new Mono County Jail on Twin Lakes Road in Bridgeport.

**Action:** None.

**Paul Roten, Public Works Director:**

- Presented item.

Moved to Item #7e.

#### **M. Sustainable Outdoors and Recreation Update**

Departments: Public Works - Recreation

(Marcella Rose, Sustainable Recreation Coordinator) - An update of activities performed and planned by the Sustainable Outdoors and Recreation division, and request for approval of minor additions to the SOAR Overall Work Program.

**Action:** Approved the updated Overall Work Program.

**Gardner moved; Kreitz seconded**

**Vote: 5 Yes, 0 No**

**M23-278**

**Marcella Rose, Sustainable Recreation Coordinator:**

- Presented item.

**Paul McFarlen, Lee Vining resident:**

- Discussion on how important collaborate efforts are for our Sustainable Outdoors and Recreation team.

Moved to Board Reports.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

## 8. CLOSED SESSION

*Closed Session: 1:04 PM*  
*Reconvened: 2:55 PM*

No action to report out of Closed Session.

Moved to Adjournment.

### A. Closed Session - Labor Negotiations

CONFERENCE WITH LABOR NEGOTIATORS. Government Code Section 54957.6. Agency designated representative(s): Sandra Moberly, Mary Booher, Stacey Simon, Janet Dutcher, Jay Sloane, Christine Bouchard, and Oliver Yee. Employee Organization(s): Mono County Sheriff's Officers Association (aka Deputy Sheriff's Association), Local 39 - majority representative of Mono County Public Employees (MCPE) and Deputy Probation Officers Unit (DPOU), Mono County Paramedic Rescue Association (PARA), Mono County Correctional Deputy Sheriffs' Association. Unrepresented employees: All.

### B. Closed Session - Exposure to Litigation

CONFERENCE WITH LEGAL COUNSEL – ANTICIPATED LITIGATION. Significant exposure to litigation pursuant to paragraph (2) of subdivision (d) of Government Code section 54956.9. Number of potential cases: one. Facts and circumstances: Written threat of litigation made by Sierra del Oro Trading Company, LLC, Paula Richards, Chief Officer, November 8, 2023 (attached).

### C. Closed Session - Public Employee Evaluation

PUBLIC EMPLOYEE PERFORMANCE EVALUATION. Government Code section 54957. Title: County Administrative Officer.

## 9. BOARD MEMBER REPORTS

### Chair Duggan:

- Met with the Ferguson Group.
- Attended the CSA #1 meeting.

### Supervisor Gardner:

- On Nov. 9 I participated in a meeting of the Lee Vining Chamber of Commerce. Topics at that meeting included the Caltrans Lee Vining Hwy 395 Rehabilitation Project and planned Chamber events.
- Also, on Nov. 9 I attended the SCE meeting about their plans concerning the Recommissioning process for the Rush Creek Hydroelectric System. There will be several more meetings about this project over the next few years.

### Note:

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors

- On Nov. 15 I participated in the Juvenile Justice Coordinating Council meeting. We approved the required state plan and discussed options for better communication across the various departments working with youth.
- On Nov. 16 I participated in a meeting of the Financial Advisory Team which is part of the Eastern Sierra Climate and Community Resilience Project. We reviewed financial details and plans for the project. We will receive another briefing about this project on Dec. 12.
- On Nov. 27 I participated in a meeting with Mammoth Town officials and ESCH staff to talk about the Access Apts. Project. The Town is still considering additional contributions to this project.
- Last Tuesday Nov. 28, I participated in a meeting of the Wildfire Risk Reduction and Asset Protection Working Group. We heard presentations about ongoing work to create Firewise Communities.
- Last Friday, Dec. 1, I participated in the monthly meeting of the Kutzadika Tribal Council. We discussed the status of the Tribe's Federal Recognition legislation in Congress and other Tribal projects and activities.
- Yesterday I joined others in the region for the monthly meeting of the Eastern Sierra Sustainable Recreation Partnership. We reviewed several ongoing projects and got partner and state updates as well as ESCOG activities.

**Supervisor Kreitz:**

- November 27<sup>th</sup> – Sierra Nevada Conservancy – East Subregion Check-in call. Beginning in January Kern County will be part of the East Subregion, Inyo Supervisor Griffiths will remain the representative for our region for his two-year term with the second year beginning in 2024.
- November 28<sup>th</sup> – met with The Ferguson Group to discuss Mono County's federal priorities.
- November 30<sup>th</sup> – the Mono County Housing ad-hoc committee met.
- Tomorrow evening the Mammoth Lakes Town Council will consider funding the financial gap on the Access Apartments redevelopment in Mammoth Lakes by Eastern Sierra Community Housing.

**Supervisor Peters:**

- Met with the Ferguson Group.
- Attended the WIR Meeting.

**Supervisor Salcido:**

- December 6th, I attended the Mono County Unified Command meeting where Sue...., the avalanche predictor who works with Mono County, recounted her thoughts on last winter and made some educated guesses about the current winter. She believes that this winter will be robust, even with the slow start.
- 12/7/23 – Mammoth Voices held their last meeting facilitated by Mickey Brown. Many thanks to Mickey for her years of providing this open forum of discussion to our County. Hoping for a continuance of this forum.
- 12/8/23 Attended the Local Government Subcommittee of the CA Jobs First initiative. Members expressed their interest in seeing that ideas identified so far are moved forward with the High Road Transition committee. Also, if the BOS would like to place an agenda item to review the local ideas to date and weigh in on them before submittal?
- December 11, there was an ad hoc multifamily housing smoking ordinance discussion on how to advance this initiative and Eric is working on a draft of the ordinance. Jennifer and I represent the BOS on this committee.
- December 11, a meeting of the Behavioral Health Advisory Board was held.

Moved to Closed Session.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**ADJOURNED at 2:57 PM.**

**ATTEST**

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**RHONDA DUGGAN  
CHAIR OF THE BOARD**

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**DANIELLE PATRICK  
SENIOR DEPUTY CLERK OF THE BOARD**



**DRAFT MEETING MINUTES  
BOARD OF SUPERVISORS, COUNTY OF MONO  
STATE OF CALIFORNIA**

Regular Meetings: First, Second, and Third Tuesday of each month. Location of meeting is specified below.

Meeting Location: Board Chambers, 2nd Fl., County Courthouse, 278 Main St., Bridgeport, CA 93517

**Regular Meeting  
December 12, 2023**

**Backup Recording**

**Minute Orders**

**Resolutions-**

**Ordinance**

**Zoom**

**M23-279 – M23-281**

**R23-109 - R23- 113**

**ORD23-007 Used**

9:05 AM Meeting called to order by Chair Duggan.

*Supervisors Present: Duggan, Gardner, Kreitz, Salcido, and Peters. (All members were present in-person or participated via teleconference in compliance with rules established by the Ralph M. Brown Act).*

*Supervisors Absent: None.*

The Mono County Board of Supervisors stream most of their meetings live on the internet and archives them afterward. To search for a meeting from June 2, 2015, forward, please go to the following link: <http://www.monocounty.ca.gov/meetings>

Pledge of Allegiance led by Supervisor Peters.

**1. OPPORTUNITY FOR THE PUBLIC TO ADDRESS THE BOARD**

No one spoke.

**2. RECOGNITIONS - NONE**

**3. COUNTY ADMINISTRATIVE OFFICER**

**Sandra Moberly, County Administrative Officer:**

- Bridgeport Post Office update.
- Update on the phone call campaign.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**Stacey Simon, County Counsel:**

- Clarifies qualification of the need and when to add an urgent item.

**Supervisor Kreitz:**

- Inquired about the phone call campaign.
- Discussed the report from Colorado mountain towns regarding USPS and the issues with mail delivery in mountain towns similar to Mono County.

**B. Urgency Item Addition to Agenda – Discussion and direction regarding the urgent situation with the Bridgeport Post Office at 11:30 AM:**

The Board determined that there is a need to take immediate action with respect to the proposed agenda item, that the need for action came to the County's attention subsequent to the agenda being posted and therefore, that the Board add the item to the agenda. *Authority Govt. Code §54954.2(b)(2). Note that urgency items may only be added to the agendas of regular meetings, not special meetings.*

**Salcido moved; Kreitz seconded**

**Vote: 5 Yes, 0 No**

**M23-279**

**4. DEPARTMENT/COMMISSION REPORTS**

**Wendy Sugimura, Community Development:**

- Update on the Tri-Valley Ground Water Model Grant.
- Discussed a grant opportunity through the State Department of Water Resources.

**5. CONSENT AGENDA**

(All matters on the consent agenda are to be approved on one motion unless a board member requests separate action on a specific item.)

**A. California Governor's Office of Emergency Services Governing Body Resolution for purposes of Grant Program Administration**

Departments: Emergency Management

California Governor's Office of Emergency Services (CalOES) requires the Board of Supervisors to appoint by resolution specific staff to execute on behalf of the County all actions related to obtaining federal financial assistance for any existing or future grant programs specified within the resolution. Some minor, technical issues were identified with the County's current resolution and this item would correct those issues without altering the designees.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**



**Action:** Adopted Resolution R23-109, Appointing specific staff to execute on behalf of the County all actions related to obtaining federal financial assistance for any existing or future grant programs specified within the resolution. Some minor, technical issues were identified with the County's current resolution and this item would correct those issues without altering the designees.

**Kreitz moved; Gardner seconded**

**Vote: 5 Yes, 0 No**

**R23-109**

## **B. Agreements with Mono County Office of Education and Office of Child Abuse and Prevention/California Children's Trust Fund**

Departments: Health and Human Services (HHS)

Proposed contracts with Mono County Office of Education pertaining to Office of Child Abuse and Prevention (OCAP) funds.

**Action:** Approved, and authorized Chair to enter into agreements with Mono County Office of Education for (1) coordination of the Mono County Child Abuse Prevention Council, and (2) coordination of the California Alternative Payment Program child care service for the period of July 1, 2023 through June 30, 2026 and a not-to-exceed amount of \$99,000 (as to the Child Abuse Prevention Council contract) and \$248,710 (as to the California Alternative Payment Program contract).

**Kreitz moved; Gardner seconded**

**Vote: 5 Yes, 0 No**

**M23-280**

**Supervisor Kreitz:**

- Requested to discuss item.

**Michelle Raust, Program Manager, Child, and Adult Services:**

- Discussed the current alternative payment program and that there is a waitlist (currently 40 children on waitlist).
- Discussed the application process.

**Supervisor Gardner:**

- Requested Board support on a Childcare Workshop in the spring.

## **C. Appointment to the Mammoth Lakes Mosquito Abatement District**

Departments: Clerk of the Board

In May of 2023, one seat on the Mammoth Lakes Mosquito Abatement District (MLMAD) Board was vacated. There were no applications initially submitted. In September of 2023, one application was submitted.

**Note:**

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**Action:** Appointed David Smith to a seat on the Mammoth Lakes Mosquito Abatement District Board of Trustees, with a term expiring May 15, 2026.

**Kreitz moved; Gardner seconded**

**Vote: 5 Yes, 0 No**

**M23-281**

## 6. CORRESPONDENCE RECEIVED

Direction may be given to staff regarding, and/or the Board may discuss, any item of correspondence listed on the agenda.

### A. G.C. Products Grant Support Letter

Letter of support for the G. C. Forest Products Wood Pellet Mill application to the USDA Forest Service Wood Innovations Grant (WIG) Program.

## 7. REGULAR AGENDA - MORNING

### A. Child Support Services Department Presentation

Departments: Child Support Services

(Amy Weurdig, Eastern Sierra Child Support Services Regional Director) - Presentation from the Eastern Sierra Department of Child Support Services.

**Action:** None.

**Amy Weurdig, Eastern Sierra Child Support Services Regional Director:**

- Presented item.

**Samantha Rottner, Eastern Sierra Child Support Services:**

- Presented item.

### B. Whitebark Presentation on Regional Wildfire Resiliency

Departments: Board of Supervisors, Sponsored by Supervisor Gardner

(Janet Hatfield, Whitebark Forest Resilience Program Manager) - Presentation by Whitebark Institute on Regional Wildfire Resilience work beyond the Eastern Sierra Climate and Communities Resilience Project (ESCCRP).

**Action:** None.

**Janet Hatfield, Whitebark Forest Resilience Program Manager:**

- Presented item.

**Laura Beardlsey, Whitebark Executive Director:**

- Introduced herself.

**Note:**

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**Supervisor Gardner:**

- Discussion on tribal engagement and challenges regarding staffing shortages.

**Nathan Sill, United States Forest Service:**

- Clarifies tribal consultation.

**Supervisor Salcido:**

- Discussion on the best way to support the program.

*Break: 10:42 AM*

*Reconvened: 10:52 AM*

### **C. Eastern Sierra Green Business Program Update**

Departments: County Administrative Office

(Pam Close Bold, High Sierra Energy Executive Director and Jess Blackwell, High Sierra Energy) - The High Sierra Energy Foundation implements the Eastern Sierra Green Business Program, a comprehensive environmentally focused business certification program. Initially, we ran the program only in Mammoth Lakes for the first two years and later expanded to the entire region. Even with limited funding, the Covid pandemic, impacts from wildfires and last year's historic winter, nearly 100 businesses in the region have become certified or are somewhere in-between in their certification process. The Eastern Sierra program is one of only a few programs within California Green Business Network that is not funded by its municipalities, historically relying instead on funding from the CalEPA -- however due to state budget deficit, this funding is no longer available. We are seeking funding to ensure the program can thrive and continue to serve our communities across Mono and Inyo counties. Investing in a green business program is not just an environmental responsibility but a strategic move for the economic, social, and environmental well-being of Mono County, fostering a thriving and sustainable community.

**Action:** None.

**Pam Close Bold, High Sierra Energy Executive Director:**

- Provided background.

**Jess Blackwell, High Sierra Energy:**

- Presented item.

### **D. Postponement of Implementation of Senate Bill (SB) 43 – Criteria for Involuntary Commitment**

Departments: Behavioral Health

(Robin K. Roberts, Behavioral Health Director) - SB 43 is scheduled to take effect on January 1, 2024. This new law expands the criteria for involuntary commitment under existing law to include situations where a person, as a result

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

of a severe substance use disorder, a co-occurring mental health disorder and severe substance use disorder, or chronic alcoholism is unable to provide for their own personal safety or necessary medical care. There is a provision to delay enactment of SB 43 by two years with the adoption of a Board resolution making findings as to why the jurisdiction needs additional time to comply with the law. Mono County has no facilities available to provide the proper treatment to those who would meet this new criteria and staff is therefore recommending that implementation be delayed until January 1, 2026, as allowed by the law.

**Action:** Adopted Resolution R23-110, Delaying implementation of SB 43 in Mono County until January 1, 2026.

**Peters moved; Salcido seconded**

**Vote: 5 Yes, 0 No**

**R23-110**

**Robin K. Roberts, Behavioral Health Director:**

- Presented item.

Moved to item #7g.

## **E. Funding Opportunities for Affordable Housing and Other Projects**

Departments: County Counsel

(Christopher Beck, Assistant County Counsel) - Provide the Board with an update regarding funding opportunities, including enhanced infrastructure financing districts (EIFDs), increase in transient occupancy tax (TOT), or other options, for affordable housing and other projects.

**Action:** None, item tabled until 1/9/24.

## **F. Pension Workshop**

Departments: Finance

(Janet Dutcher, Finance Director; Dan Matusiewicz, GovInvest) - Presentation by GovInvest, Inc. updating the Board about CalPERS policy and investment strategies, current challenges, and how Mono County is doing, including projection of the unfunded accrued liability, its funded status, contribution requirements, and future budgetary impacts.

**Action:** None.

**Janet Dutcher, Finance Director**

- Introduced item and provided background.

**Dan Matusiewicz, GovInvest:**

- Presented item.

Moved to adjournment.

## **G. Employment Agreement with Tom Perry as part-time Building Official**

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

Departments: Community Development

(Wendy Sugimura, Community Development Director) - Proposed employment agreement with Tom Perry as part-time Building Official.

**Action:** Approved Resolution R23-111, Approving a contract with Tom Perry as Building Official, and prescribing the compensation, appointment, and conditions of said employment. Authorize the Board Chair to execute said contract on behalf of the County.

**Fiscal Impact:** The estimated cost of this position for the remainder of the fiscal year is \$19,068, of which \$18,630 is salary and \$438 is payroll taxes. The total cost of salary for an entire fiscal year is approximately \$38,135, of which \$37,260 is salary and \$875 is payroll taxes. This is included in the Department's FY 2023/24 adopted budget.

**Kreitz moved; Peters seconded**

**Vote: 5 Yes, 0 No**

**R23-111**

**Wendy Sugimura, Community Development Director:**

- Presented item.
- Announced code changes to come in the next California Build Code Cycle and that Tom Perry will be coming to the Board with a future item.

#### **H. Resolution Declaring December 22, 2023, a County Holiday, and Closing County Offices on that Day**

Departments: Board of Supervisors

(Stacey Simon, County Counsel) - Proposed resolution closing County offices on December 22, 2023, and declaring that day a County Holiday.

**Action:** Adopted Resolution R23-112, Closing County offices on December 22, 2023, and declaring that day a County Holiday.

**Salcido moved; Peters seconded**

**Vote: 5 Yes, 0 No,**

**R23-112**

**Stacey Simon, County Counsel:**

- Presented item.

#### **I. Election Update**

Departments: Elections

(Queenie Barnard, Clerk-Recorder-Registrar) - Update on the March 5, 2024, Presidential Primary Election.

**Action:** None.

**Queenie Barnard, Clerk-Recorder-Registrar:**

**Note:**

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- Presented item.

**J. Urgency Item Addition to Agenda: Discussion and direction regarding the urgent situation with the Bridgeport Post Office at 11:30 AM.**

**Chair Duggan:**

- Introduced item.

**Sandra Moberly, County Administrative Officer:**

- Discussed the media requests that the County has received.
- Update on the USPS communication with Justin Caporusso regarding the closure of the post office.

**Chelyssa Horvat, District Director U.S. Congressman Kevin Kiley, CA-03:**

- Provided an update on USPS operations.
- Dennis Reyes, Manager of USPS Operations:
  - Plans on visiting the Bridgeport Post Office to do a site visit.
- Will continue to assist with USPS and will provide the County with updates.

**Supervisor Peters:**

- Discussion on SCE visit.
- Update on the current maintenance that is occurring.
- Suggested getting a large tent to cover the current outdoor post office.
- Discussed the possibility of tax payments being delayed due to the post office challenges.

**Chair Duggan:**

- Will meet with Dennis Reyes for a site visit at the Bridgeport Post Office.
- Discussion on late payments and if there are any options for appealing late payments.

**Janet Dutcher, Finance Director:**

- Discussed late tax payments and electronic payments.

**Gerald Frank, Treasurer/Tax Collector:**

- Discussed the late payments regarding the local effects of post office challenges (post marks).
- Clarified the Waiver of Penalties form that is on the County Website and form will be considered case by case.

**Supervisor Gardner:**

- Discussion on eliminating mail payments and moving to electronic payments.

**8. CLOSED SESSION**

*Closed Session: 11:53 AM  
Reconvened: 12:31 PM*

No action to report out of Closed Session.

**A. Closed Session - Existing Litigation**

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors

CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION.  
Paragraph (1) of subdivision (d) of Government Code section 54956.9. Name of case: Villanueva v. Mammoth Unified School District, et al. (Case No: 22UCM99).

### **B. Closed Session - Labor Negotiations**

CONFERENCE WITH LABOR NEGOTIATORS. Government Code Section 54957.6. Agency designated representative(s): Sandra Moberly, Mary Booher, Stacey Simon, Janet Dutcher, Jay Sloane, Christine Bouchard, and Oliver Yee. Employee Organization(s): Mono County Sheriff's Officers Association (aka Deputy Sheriff's Association), Local 39 - majority representative of Mono County Public Employees (MCPE) and Deputy Probation Officers Unit (DPOU), Mono County Paramedic Rescue Association (PARA), Mono County Correctional Deputy Sheriffs' Association. Unrepresented employees: All.

### **C. Closed Session - Public Employee Evaluation**

PUBLIC EMPLOYEE PERFORMANCE EVALUATION. Government Code section 54957. Title: County Administrative Officer.

## **9. REGULAR AGENDA - AFTERNOON**

### **A. Memorandum of Understanding for Mono County Public Employees Bargaining Unit (MCPE)**

Departments: CAO, HR, Finance, and County Counsel

(Sandra Moberly, County Administrative Officer) - Proposed resolution approving Memorandum of Understanding (MOU) with the International Union of Operating Engineers, Stationary Local 39, AFL-CIO, the Exclusively Recognized Employee Organization representing the Mono County Public Employees (January 1, 2024 - December 31, 2026).

**Action:** Adopted Resolution R23-113, Approving Memorandum of Understanding (MOU) with the International Union of Operating Engineers, Stationary Local 39, AFL-CIO, the Exclusively Recognized Employee Organization representing the Mono County Public Employees (January 1, 2024 - December 31, 2026).

**Salcido moved; Gardner seconded**

**Vote: 4 Yes, 0 No, 1 absent**

**R23-113**

**Sandra Moberly, County Administrative Officer:**

- Presented item.

**Mary Booher, Special Projects:**

- Provided position updates from the matrix.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**Supervisor Kreitz:**

- Discussion on 3% - 5% for the deferred compensation on what group of employees this MOU effects.

**Janet Dutcher, Finance Director:**

- Clarifies the different bargaining processes.
- Discussed the platform that the Board and Management chose to pursue for all of Mono County's labor groups.

**Stacey Simon, County Counsel:**

- Clarifies the holiday schedule and the group of employees that the holiday schedule applies to.

**Supervisor Peters:**

- Absent for this item (meeting at Bridgeport Post Office).

## 10. BOARD MEMBER REPORTS

**Chair Duggan:**

- 12/6 –RCRC. GSFA & GSCA Board of Directors Meetings: I participated in Informational items including discussion of legislative updates and projects for consideration next year.
- 12/7 – RCRC ESJPA Board of Directors Meeting: I attended via zoom in the Environmental Services Joint Powers Authority meeting along with our newly designated 2nd Alternate Chad Senior.
- 12/11 – LTC: I chaired the monthly meeting of the Local Transportation Commission along with fellow Commissioners Kreitz and Peters. Thanks to our co Directors for their continued efforts to secure funding for our local projects and to Public Works for keeping our roadwork schedule on track despite constant challenges.
- As this is my last meeting of the 2023 as Board Chair, I want to say it has been my honor to work beside my colleagues and staff through a year that pushed many to their limits. Much was learned and accomplished, paving the way for improvement and completion of the tasks ahead. Thank you for your commitment to the County and your continued guidance and support.
- I also want to thank all of you that provided your prayers and support to me and my family on the passing of my father. We lost so many in our community this past year, and our hearts are heavy with loss and grief, while looking forward to healing days ahead. I would also like to ask we adjourn in the memory of my mother, Gina Shipley, who also left us last weekend. Their hearts are in the Eastern Sierra forever.
- Everyone, have a safe, joyful, and peaceful holiday time, hopefully with those you love. Merry Christmas and Happy New Year.
- RCRC, GSFA & GSCA Board of Directors Meetings Highlights:
  1. [https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Board\\_of\\_Directors/2023/December\\_6\\_2023/RCRC\\_BOD\\_Highlights\\_December\\_6\\_2023\\_FINAL.pdf](https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Board_of_Directors/2023/December_6_2023/RCRC_BOD_Highlights_December_6_2023_FINAL.pdf)
  2. [https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Board\\_of\\_Directors/2023/December\\_6\\_2023/GSFA\\_BOD\\_Highlights\\_December\\_6\\_2023\\_FINAL.pdf](https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Board_of_Directors/2023/December_6_2023/GSFA_BOD_Highlights_December_6_2023_FINAL.pdf)
  3. [https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Board\\_of\\_Directors/2023/December\\_6\\_2023/GSCA\\_BOD\\_Highlights\\_December\\_6\\_2023\\_FINAL.pdf](https://www.rcrcnet.org/sites/default/files/useruploads/Meetings/Board_of_Directors/2023/December_6_2023/GSCA_BOD_Highlights_December_6_2023_FINAL.pdf)

**Supervisor Gardner:**

**Note:**

These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors



- Last night I participated in the monthly meeting of the Mono Basin Housing Committee. We discussed the next steps for creating a Community Housing Trust and reviewed the progress completed during this year.

**Supervisor Kreitz:**

- December 6th- I attended the Mammoth Lakes Town Council meeting where the Council approved an additional allocation of funding for the Access Apartments in the amount of \$700K.
- December 8th – I participated in the California Coalition for Rural Housing Board meeting. The Board considered the policy priorities for the 2024 legislative cycle with these being the top three receiving the highest votes:  
Advocate with coalition partners for placement and voter approval of \$10 billion housing bond on November 2024 State ballot that will include significant investments in rural, farmworker, and tribal housing.
- Push for language in the FY 24-25 State budget that fulfills the Governor's pledge in his veto message for SB 18 and AB 371 to create a dedicated Tribal housing program and collaborate with Tribes to make reforms in existing programs through the budget process.
- Advocate for State legislation granting Right-of-First Refusal/Opportunity to Purchase to mobile home park residents as was recently passed in New York State.
- December 8th - I toured the expanded Mammoth Disposal transfer station. Kendra Knight can provide us with an update on new CRV state policies going into effect in January.
- December 11th – LTC meeting: Ad Hoc Multifamily housing smoking ordinance, Eastern Sierra Continuum of Care Eastern Sierra Community

**Supervisor Peters:**

- No report.

**Supervisor Salcido:**

- December 6th, I attended the Mono County Unified Command meeting where Sue....., the avalanche predictor who works with Mono County, recounted her thoughts on last winter and made some educated guesses about the current winter. She believes that this winter will be robust, even with the slow start.
- 12/7/23 – Mammoth Voices held their last meeting facilitated by Mickey Brown. Many thanks to Mickey for her years of providing this open forum of discussion to our County. Hoping for a continuance of this forum.
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- December 11, there was an ad hoc multifamily housing smoking ordinance discussion on how to advance this initiative and Eric is working on a draft of the ordinance. Jennifer and I represent the BOS on this committee.
- December 11, a meeting of the Behavioral Health Advisory Board was held.

*Break: 1:02 PM*

*Reconvened: 1:30 Pm*

*Chair Duggan:*

- Provided an update on the Bridgeport Post Office.

Moved to Item #7f.

**Note:**

**These draft meeting minutes have not yet been approved by the Mono County Board of Supervisors**

**ADJOURNED at 2:24 PM in memory of Virginia “Gina” Shipley.**

**ATTEST**

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**RHONDA DUGGAN  
CHAIR OF THE BOARD**

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**DANIELLE PATRICK  
SENIOR DEPUTY CLERK OF THE BOARD**



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Finance**

**TIME REQUIRED**

**SUBJECT** Annual Resolution Delegating  
Investment Authority to the County  
Treasurer

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Resolution Delegating Investment Authority to the County Treasurer.

**RECOMMENDED ACTION:**

Adopt proposed resolution, Delegating Investment Authority to the County Treasurer.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Janet Dutcher

**PHONE/EMAIL:** 7609325494 / jdutcher@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|                              |
|------------------------------|
| Click to download            |
| <a href="#">Staff Report</a> |
| <a href="#">Resolution</a>   |

**History**

| Time             | Who                          | Approval |
|------------------|------------------------------|----------|
| 1/9/2024 3:36 PM | County Counsel               | Yes      |
| 1/3/2024 2:44 PM | Finance                      | Yes      |
| 1/9/2024 4:18 PM | County Administrative Office | Yes      |



# DEPARTMENT OF FINANCE

## COUNTY OF MONO

---

Gerald A. Frank, CGIP  
Assistant Finance Director  
Treasurer-Tax Collector

Janet Dutcher, CPA, CGFM, MPA  
Finance Director

Kimberly Bunn  
Assistant Finance Director  
Auditor-Controller

P.O. Box 495  
Bridgeport, California 93517  
(760) 932-5480  
Fax (760) 932-5481

P.O. Box 556  
Bridgeport, California 93517  
(760) 932-5490  
Fax (760) 932-5491

**Date:** January 16, 2024  
**To:** Honorable Board of Supervisors  
**From:** Finance: Janet Dutcher, Gerald Frank

**Subject:**

Resolution Delegating Investment Authority to the County Treasurer

**Action Requested:**

1. Adopt resolution delegating investment authority to the County Treasurer.

**Discussion:**

This resolution renews the delegation of authority to the County Treasurer established in Ordinance 18-08.

Pursuant to Government Code §53607, “The authority of the legislative body to invest or to reinvest funds of a local agency, or to sell or exchange securities so purchased, may be delegated for a one-year period by the legislative body to the treasurer of the local agency, who shall thereafter assume full responsibility for those transactions until the delegation of authority is revoked or expires, and shall make a monthly report of those transactions to the legislative body. Subject to review, the legislative body may renew the delegation of authority pursuant to this section each year.”

Pursuant to Government Code §27000.1, “Subject to Section 53607, the board of supervisors may, by ordinance, delegate to the county treasurer the authority to invest or reinvest the funds of the county and the funds of other depositors in the county treasury, pursuant to Chapter 4 (commencing with Section 53600) of Part 1 of Division 2 of Title 5. The county treasurer shall thereafter assume full responsibility for those transactions until the board of supervisors either revokes its delegation of authority, by ordinance, or decides not to renew the annual delegation, as provided in Section 53607. Nothing in this section shall limit the county treasurer's authority pursuant to Section 53635 or 53684.

Pursuant to Government Code §26980, Mono County has created the office of Director of Finance, which is consolidated with the office of County Treasurer (see Mono County Code Chapter 2.14). Accordingly, such delegation would in effect be to the Director of Finance, as County Treasurer.

**Fiscal Impact:**

None



R24-\_\_

**A RESOLUTION OF THE MONO COUNTY BOARD OF SUPERVISORS  
DELEGATING INVESTMENT AUTHORITY TO THE COUNTY TREASURER**

**WHEREAS**, Government Code §§ 53607 and 27000.1 authorize the Board of Supervisors to delegate to the County Treasurer the authority to invest or reinvest the funds of the County and the funds of other depositors in the county treasury (hereinafter “investment powers”), and provide that this delegation be carried out by ordinance and subject to annual renewal by the Board; and

**WHEREAS**, pursuant to Government Code § 26980, Mono County has created the office of Director of Finance, which office is consolidated with the office of County Treasurer (see Mono County Code 2.14) and accordingly, delegation of investment powers to the County Treasurer is a delegation of those powers to the Director of Finance, as County Treasurer; and

**WHEREAS**, pursuant to Government Code § 24100 et seq., any deputy of the Finance Director has all the power and duties of the Finance Director and any deputized Assistant Finance Director would have investment powers if such powers were delegated by the Finance Director; and

**WHEREAS**, pursuant to 79 Ops. Cal. Atty. Gen. 88, once delegated, such authority includes the ability of the County Treasurer to contract with an investment manager further delegating discretionary authority to invest funds on deposit with the Treasurer; and

**WHEREAS**, on June 5, 2018, the Mono County Board of Supervisors adopted Ordinance No. ORD18-08, delegating investment authority to the County Treasurer and authorizing the annual renewals of the delegation of investment authority to the County Treasurer to be accomplished by resolution; and

**WHEREAS**, the Board now desires to renew its delegation of investment authority to the County Treasurer pursuant to Government Code §§ 53607 and 27000.1 for the entirety of 2024.

**NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF MONO RESOLVES that:**

**SECTION ONE:** Pursuant to Government Code §§ 53607 and 27000.1, the authority to invest or reinvest funds of the County and the funds of other depositors in the county treasury, is hereby delegated to the County Treasurer, who is the County Finance Director, for the entirety of 2024.

1 **PASSED, APPROVED** and **ADOPTED** this \_\_\_\_ day of \_\_\_\_\_, 2024, by the  
2 following vote, to wit:

- 3 **AYES:**  
4 **NOES:**  
5 **ABSENT:**  
6 **ABSTAIN:**

7  
8  
9 \_\_\_\_\_  
10 John Peters, Chair  
11 Mono County Board of Supervisors

12 **ATTEST:**

**APPROVED AS TO FORM:**

13  
14 \_\_\_\_\_  
15 Clerk of the Board

16  
17 \_\_\_\_\_  
18 County Counsel



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Finance**

**TIME REQUIRED**

**SUBJECT** Mono County Statement of Investment Policy

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Annual approval of the Mono County Statement of Investment Policy pursuant to Section 27133 of the Government Code of the State of California.

**RECOMMENDED ACTION:**

Approve the Mono County Statement of Investment Policy as presented or amended.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Janet Dutcher

**PHONE/EMAIL:** 7609325494 / jdutcher@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|   |
|---|
| Click to download   |
| <input type="checkbox"/> <a href="#">Staff Report</a>                               |
| <input type="checkbox"/> <a href="#">Mono County Statement of Investment Policy</a> |

**History**

| Time             | Who            | Approval |
|------------------|----------------|----------|
| 1/9/2024 3:37 PM | County Counsel | Yes      |
| 1/3/2024 2:44 PM | Finance        | Yes      |

1/10/2024 8:28 AM

County Administrative Office

Yes





# DEPARTMENT OF FINANCE

## COUNTY OF MONO

---

Gerald A. Frank, CGIP  
Assistant Finance Director  
Treasurer-Tax Collector

Janet Dutcher, CPA, CGFM, MPA  
Finance Director

Kimberly Bunn  
Assistant Finance Director  
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**Date:** January 16, 2024  
**To:** Honorable Board of Supervisors  
**From:** Finance: Janet Dutcher, Gerald Frank

**Subject:**

Mono County Statement of Investment Policy

**Actions Requested:**

1. Approve the Mono County Statement of Investment Policy as presented or amended.

**Background:**

**Statement of Investment Policy**

The existing Statement of Investment Policy is compiled by using reference materials from the prior investment policy, the Government Finance Officers Association Best Practices and sample policy, and portions of various Counties' policies. The California Debt and Investment Advisory Commission's publication "Local Agency Investment Guidelines," which can be found at <http://www.treasurer.ca.gov/cdiac/laig/guideline.pdf>, was also referenced.

Government Code section 27133 states, "In any county that establishes a county treasury oversight committee pursuant to this article, the county treasurer shall annually prepare an investment policy that will be reviewed and monitored by the county treasury oversight committee."

The attached Statement of Investment Policy as presented is the existing policy with one minor change. The Treasury Oversight Committee reviewed and approved the change for submittal to the Board of Supervisors. The content change (noted in blue in the attached Investment Policy Document) includes:

Page 6 – Change to maximum investable amount into the California Asset Management Program from 20% to 30%.

**Fiscal Impact:**

None

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# MONO COUNTY STATEMENT OF INVESTMENT POLICY

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January 16, 2024

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## COUNTY OF MONO INVESTMENT POLICY

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### I. Introduction

The intent of the Investment Policy of the County of Mono is to define the parameters within which funds are to be managed. In methods, procedures, and practices, the policy formalizes the framework for the County's investment activities that must be exercised to ensure effective and judicious fiscal and investment management of the County's funds. The guidelines are intended to be broad enough to allow the Director of Finance to function properly within the parameters of responsibility and authority, yet specific enough to adequately safeguard the investment assets.

### II. Governing Authority

The investment program shall be operated in conformance with Government Code §53601, et seq. which provides legal authorization for the investment and deposit of funds of specified local agencies and which is made applicable to counties by Government Code §53635.2.

### III. Scope

The policy applies to activities of the County with regard to investing the financial assets of all funds. In addition, funds held by trustees or fiscal agents are excluded from these rules; however, all funds are subject to regulations established by the State of California.

Note that any excluded funds such as the Other Post Employment Benefit Trust Fund are covered by separate policies.

Except for funds in certain restricted and special funds, the County commingles its funds to maximize investment earnings and to increase efficiencies with regard to investment pricing, safekeeping and administration. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

### IV. General Objectives

The primary objectives, in priority order, of investment activities shall be:

1. **Safety** – Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The goal will be to mitigate the credit risk and interest rate risk.
2. **Liquidity** – The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated.
3. **Yield** – The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints of safety and liquidity needs.

### V. Standards of Care

1. **Prudence** – The standard to be used by the Director of Finance/Investment Officer shall be the “prudent person” standard and shall be applied in the context of managing an overall portfolio. The Finance Director acting in accordance with written procedures and this

investment policy and exercising due diligence shall be relieved of personal liability for an individual security's credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and appropriate action is taken to control adverse developments.

The "prudent person" standard states that,

*"Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived."*

2. **Ethics and Conflicts of Interest** – Officers and employees involved in the investment process shall refrain from personal activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial investment decisions. Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business. Disclosure shall be made to the governing body. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking any personal investment transactions with the same individual with whom business is conducted on behalf of the County.
3. **Delegation of Authority and Responsibilities Governing Body** – The Board of Supervisors (Board) will retain ultimate fiduciary responsibility for the portfolio. The Board will receive monthly and quarterly reports, designate investment officers and annually review the investment policy making any necessary changes by adoption.

**Delegation of Authority** – Pursuant to Government Code §53607, authority to invest or reinvest, or to sell or exchange securities so purchased, may be delegated for a one-year period; thereafter, the County Finance Director shall assume full responsibility for those transactions until the delegation of authority is revoked or expires, and shall make a monthly report of those transactions to the legislative body. Subject to review, the legislative body may renew the delegation of authority pursuant to this section each year.

Responsibility for the operation of the investment program shall be delegated by ordinance pursuant to Government Code §27000.1 to the Finance Director until the Board of Supervisors revokes its delegation of authority, by ordinance, or decides not to renew the annual delegation. The Finance Director shall act in accordance with established, written procedures and internal controls for the operation of the investment program consistent with this Investment Policy.

All participants in the investment process shall seek to act responsibly as custodians of the public trust.

**Treasury Oversight Committee** – A County Treasury Oversight Committee has been established in accordance with §27130 et seq. of the Government Code to promote public interest by involving depositors in the management of their funds. The Treasury Oversight Committee shall:

- A. Review and monitor the Investment Policy,
- B. Annually review the investments made by the County Treasury,
- C. Cause an annual audit to be conducted to determine the County Treasury's compliance with Government Code §27130 et seq., and

- D. Meet on other matters as necessary.

By statute, the County Treasury Oversight Committee has no authority to direct individual investment decisions, select individual investment advisors, brokers, or dealers, or to impinge on the day-to-day operations of the County Treasury.

Committee members may not accept any honoraria, gifts or gratuities from advisors, brokers, dealers, bankers, or other persons with whom the County Treasury conducts business, which are more than the limits imposed by State Law, or by the Fair Political Practices Commission.

**Investment Advisor** – The County may engage the services of one or more external investment managers to assist in the management of the entity’s investment portfolio in a manner consistent with the entity’s objectives. Such external managers may be granted discretion to purchase and sell investment securities in accordance with this Investment Policy. Such managers must be registered under the Investment Advisers Act of 1940.

## **VI. Authorized Financial Institutions, Depositories and Broker/Dealers**

1. Financial institutions and depositories authorized to provide investment services and security broker/dealers will be selected by creditworthiness (e.g., a minimum capital requirement of \$10,000,000 and at least five years of operation). These may include “primary” dealers or regional dealers that qualify under both Government Code §53601.5 and Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule).
2. All financial institutions and broker/dealers who desire to become qualified for investment transactions shall meet the requirements of Government Code §53601.5 and, in addition, must supply the following as deemed appropriate by the Finance Director.
  - A. Audited financial statements demonstrating compliance with the state and federal capital adequacy guidelines.
  - B. Proof of Financial Industry Regulation Authority (FINRA) certification (not applicable to Certificate of Deposit counterparties).
  - C. Proof of California state registration.
  - D. Certification of having read and understood and agreeing to comply with the County’s investment policy.
  - E. Evidence of adequate insurance coverage meeting any applicable requirements of State law and otherwise deemed adequate by the Finance Director.
3. An annual review of the financial condition and registration of all qualified financial institutions and broker/dealers will be conducted by the Finance Director.

## **VII. Safekeeping and Custody**

1. **Delivery vs. Payment** – All trades, where applicable, will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in an eligible financial institution prior to the release of funds.
2. **Safekeeping** – Pursuant to Government Code §53608, the Board delegates to the Finance Director its authority to deposit securities for safekeeping. Securities will be held by a third-party custodian meeting the requirements of Government Code §53608 or other applicable law and selected by the Finance Director. The safekeeping institution shall annually provide a

copy of their most recent report on internal controls (Statement of Auditing Standards No. 70)

- 3. Internal Controls** – The Finance Director is responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the County are protected from loss, theft or misuse. The internal control structure shall be designed to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognizes that the cost of the control should not exceed the benefits likely to be derived and that the valuation of costs and benefits requires estimates and judgments by management. The internal controls shall address the following points at a minimum:
- A. Control of collusion,
  - B. Separation of transaction authority from accounting and recordkeeping,
  - C. Custodial safekeeping,
  - D. Avoidance of physical delivery securities,
  - E. Clear delegation of authority to subordinate staff members,
  - F. Written confirmation of transactions for investments and wire transfers,
  - G. Dual authorization of wire transfers,
  - H. Development of a wire transfer agreement with the lead bank and third-party custodian,
  - I. Staff training, and
  - J. Review, maintenance and monitoring of security procedures both manual and automated.

## VIII. Authorized Investments

- 1. Investment Types** – All investments shall be made in accordance with §53600 et seq. of the California Government Code and as described within this Investment Policy and summarized in Appendix A. Permitted investments under this policy shall include:

- A. **United States Treasury notes, bonds bills, or certificates of indebtedness**, or those for which the faith and credit of the United States are pledged for the payment of principal and interest. [Gov't Code §53601(b).]

*There is no limitation as to the percentage of the portfolio that can be invested in this category.*

- B. **Federal Agency or United States Government-Sponsored Enterprise Obligations, Participations, or other Instruments**, including those issued by or fully guaranteed as to principal and interest by Federal agencies or United States government-sponsored enterprises §53601(f) such as Fannie Mae and Freddie Mac.

*There is no limitation as to the percentage of the portfolio that can be invested in this category.*

- C. **State of California Notes & Bonds** registered state warrants or treasury notes of California including bonds payable solely out of the revenues from a revenue-producing property owned, controlled, or operated by the state or by a department, board, agency, or authority of the state. [Gov't Code §53601(c).]

*There is no limitation as to the percentage of the portfolio that can be invested in this category.*

- D. **Notes and Bonds of Other 49 States** registered treasury notes or bonds of any of the other 49 states, including bonds payable solely out of the revenues from a revenue-producing property owned, controlled, or operated by the state or by a department, board, agency, or authority of that state. [Gov't Code §53601(d).]

*There is no limitation as to the percentage of the portfolio that can be invested in this category.*

- E. **Negotiable Certificates of Deposit (NCDs)** issued by a nationally or state chartered bank, a state or federal savings and loan association, a State or federal credit union or by a state-licensed branch of a foreign bank. [Gov't Code §53601(i).]

*No more than 30% of the portfolio may be invested in NCDs*

- F. **Banker's acceptances**, otherwise known as bills of exchange or time drafts that are drawn on and accepted by a commercial bank. [Gov't Code §53601(g).]

*May not exceed 180 days to maturity or be more than 40% of the market value of the portfolio and no more than 30% of the County's moneys may be invested in banker's acceptances in the same bank.*

- G. **Commercial paper** of "prime" quality of the highest ranking or of the highest letter and number rating as provided for by a nationally recognized statistical-rating organization (NRSRO) such as Standard & Poor's or Moody's. [Gov't Code §53601(h) & §53635(a).]

*Must have a maximum maturity of 270 days or less, no more than 40% of the portfolio may be invested in eligible commercial paper and no more than 10% may be invested in any one issuer's commercial paper.*

- H. **Medium-term notes** include corporate and depository institution debt securities with a maximum remaining maturity of five years or less, issued by corporations organized and operating within the United States or by depository institutions licensed by the United States or any state and operating within the United States and rated "A" or better by an NRSRO. [Gov't Code §53601(k).]

*May not exceed 30% of the portfolio may be invested in medium-term notes.*

- I. **Reverse repurchase agreements** whose underlying purchased securities consist of the aforementioned instruments, subject to all the conditions set forth in Government Code §53601(j)(3).

*May not exceed 20% of the base value of the portfolio and no agreement may exceed 92 days.*

- J. **Money market mutual funds** – shares of beneficial interest issued by diversified management companies that are money market funds registered with the Securities and Exchange Commission under the Investment company Act of 1940 (15 U.S.C. §80a-1 et sec. [Gov't Code §53601(l).]

*No more than 20% of the portfolio may be invested in money market funds.*

- K. **Local Agency Investment Fund** – established by the State Treasurer for the benefit of local agencies. [Gov't Code §16429.1.]

*No more than \$75 million may be invested in LAIF (LAIF rules)*

- L. **California Asset Management Program (CAMP)**. Shares in a California common law trust established pursuant to Title 1, Division 7, Chapter 5 of the Government Code of



the State of California which invests exclusively in investments permitted by §53601 of the Government Code as it may be amended. [Gov't Code §53601(p).]

***No more than 30% of the portfolio may be invested in the California Asset Management Program***

M. **Commercial or Savings Bank, Savings and Loan or Credit Union** may be used to invest surplus funds up to 30% of the portfolio pursuant to §§53601.8 and 53635.8 of the Government Code.

***No more than 10% can be invested in any one institution.***

N. **Bonds, notes, warrants or other evidences of indebtedness** of a local agency within the State of California, including local agencies formed within Mono County. [Gov't Code §53601(e).]

***May not exceed 5 years to maturity. All investments with local agencies formed within Mono County must be pre-approved by the Board of Supervisors.***

O. **Supranationals** – United States dollar denominated senior unsecured unsubordinated obligations issued or unconditionally guaranteed by the International Bank for Reconstruction and Development, International Finance Corporation, or Inter-American Development Bank, with a maximum remaining maturity of five years or less, and eligible for purchase and sale within the United States and rated AA or better by an NRSRO. [Gov't Code §53601(q).]

***No more than 30% may be invested in supranationals***

2. **Collateralization** – Where allowed by state law, full collateralization will be required on all demand deposit accounts, including checking accounts and non-negotiable certificates of deposit. Repurchase agreements will be collateralized at 102 percent.

## IX. Investment Parameters

1. **Mitigating Credit Risk in the portfolio** – Credit risk is the risk that a security or a portfolio will lose some or all of its value due to a real or perceived change in the ability of the issuer to repay its debt. The County shall mitigate credit risk by adopting the following:

**Diversification** – The investments will be diversified by

- i. Limiting investments to avoid overconcentration in securities from a specific issuer or business sector (excluding U.S. Treasury securities),
- ii. Limiting investment in securities that have higher credit risks,
- iii. Investing in securities with varying maturities, and
- iv. Continuously investing a portion of the portfolio in readily available funds such as local government investment pools, money market funds or overnight repurchase agreements to ensure that appropriate liquidity is maintained in order to meet ongoing obligations.

Due to fluctuations in the aggregate surplus funds balance, maximum percentages for a particular issuer or investment type may be exceeded at a point in time subsequent to the purchase of a particular issuer or investment type. Securities need not be liquidated to realign the portfolio; however, consideration should be given to this matter when future purchases are made to ensure that appropriate diversification is maintained.

**2. *Mitigating Market Risk in the portfolio*** – Market risk is the risk that the portfolio value will fluctuate due to changes in the general level of interest rates. The County recognizes that, over time, longer-term/core portfolios have the potential to achieve higher returns. On the other hand, longer-term portfolios have higher volatility of return. The County shall mitigate market risk by providing adequate liquidity for short-term cash needs, and by making longer-term investments only with funds that are not needed for current cash flow purposes. The County further recognizes that certain types of securities, including variable rate securities, securities with principal pay downs prior to maturity, and securities with embedded options, will affect the market risk profile of the portfolio differently in different interest rate environments. The County, therefore, adopts the following strategies to control and mitigate market risk:

- i. The County shall maintain a minimum of three months of budgeted operating expenditures in short term investments to provide sufficient liquidity for expected disbursements,
- ii. The maximum percentage of callable Agency Bonds or Certificate of Deposits in the portfolio shall be 30%,
- iii. The maximum stated final maturity of individual securities in the portfolio shall be five years, except as otherwise stated in this policy,
- iv. Liquidity funds will be held in LAIF, CAMP or money market instruments maturing one year and shorter,
- v. Longer term/Core funds will be defined as the funds in excess of liquidity requirements. The investments in this portion of the portfolio will have maturities between 1 day and 5 years and will be only invested in higher quality and liquid securities.
- vi. It is recommended that the Weighted Average Maturity of the portfolio not exceed 24 months (730 Days) or such shorter dollar-weighted average maturity as may be required by State law. Securities need not be liquidated to realign the portfolio; however, consideration should be given to this matter when future purchases are made to ensure that the appropriate Weighted Average Maturity is maintained.

## **X. Reporting**

1. The Finance Director shall provide quarterly investment reports to the Board of Supervisors within 45 days following the end of the quarter covered by the report. These reports shall include the following investment information as required by Government Code §53646(b):
  - A. The type of investment, issuer, date of maturity, par and dollar amount invested in all securities, investments and moneys held in the County Treasury,
  - B. Market value as of the date of the report and the source of this valuation,
  - C. The weighted average maturity of the investments within the Treasury,
  - D. Distribution by type of investment,
  - E. A description of all the County's funds and investments that are under the management of contracted parties,
  - F. A statement of compliance of the portfolio to this Statement of Investment Policy or manner in which the portfolio is not in compliance, and

- G. A statement denoting the ability of the County to meet its pool's expenditure requirements for the next six months, or provide an explanation as to why sufficient money shall, or may, not be available.
2. The Treasury Oversight committee shall cause an annual audit to be conducted to determine the county treasury's compliance with Chapter 5, Article 6 (§27130-§27137) of the Government Code and this Statement of Investment Policy.

#### **XI. Investment Pool Costs and Earnings Distribution**

Costs directly related to the operation and management of the investment pool shall be deducted quarterly directly from net interest earnings prior to the distribution of interest earnings for the quarter. Pool costs include, but are not limited to, staff time, investment tracking costs, brokerage costs, and treasury pool audit costs.

Interest earnings shall be allocated quarterly according to each fund's average daily cash balances as a percentage of the total investment pool. Earnings shall be the net of received interest, amortized premiums, accreted discounts and profit or loss on the sale of trade of a security attributable to the quarter being apportioned, plus adjustments from prior quarters. The interest shall be apportioned as of the last day of the quarter and added to each participating fund's balance in the pooled investment fund.

#### **XII. Investing of Bond Proceeds**

The County Treasurer shall invest bond proceeds using the standards of this Investment Policy. The bond proceeds will be invested in securities permitted by the bond documents. If the bond documents are silent, the bond proceeds will be invested in securities permitted by this Policy.

#### **XIII. Withdrawal Requests**

##### **1. Regular Operation**

The County Finance Director seeks to honor all written withdrawal requests for regular operating purposes that are approved by the County Auditor- Controller's Office in a timely fashion. However, the County Finance Director recognizes that occasionally the Pool Participants may request large amounts in withdrawals to cover unexpected operational needs. To accommodate such withdrawals and allow for adequate time for adjustments to the liquidity position of the Pool, the County Finance Director expects all Pool Participants to submit their written requests within the following timeframes:

- A. Withdrawals up to \$2 million – 3 business days in advance of disbursement
- B. Withdrawals above \$2 million – 5 business days in advance of disbursement and in no case can more than \$5 million dollars be withdrawn in a single business day

Extraordinary withdrawal requests are considered withdrawals outside the normal cash-flow patterns of a Pool Participant. For any withdrawal considered extraordinary, the Finance Director shall evaluate the effect of the proposed withdrawal on the stability and predictability of the investments in the County treasury. In the event that the Finance Director must liquidate investments in order to honor the withdrawal request, the Pool Participant who requests the withdrawal shall be subject to all expenses associated with the liquidation,

including, but not limited to loss of principal and interest income, withdrawal penalties, and associated fees.

## **2. Investing or Depositing Funds Outside the Pool**

Any entity that seeks to withdraw funds for the purpose of investing or depositing those funds outside the county treasury pool, shall first submit the request for withdrawal to the Finance Director who shall evaluate the effect of the proposed withdrawal on the stability and predictability of the investments in the county treasury. Prior to approval, the Finance Director shall find that the proposed withdrawal will not adversely affect the interests of the other depositors in the pool (Government Code §27136). If it is necessary to liquidate securities, all losses occurring from the sale of a security prior to its maturity shall be borne by the entity wishing to withdraw funds.

## **XIV. Terms and Conditions for Outside Investors**

Outside local agencies, where the County Finance Director does not serve as the agency's treasurer, may invest in Mono County's Investment Pool as permitted by Government Code §53684. Deposits are subject to the consent of the County Finance Director. The local agency legislative body must approve the county investment pool as an authorized investment. If the County Finance Director deems appropriate, the deposits may be returned at any time.

## **XV. Policy Review**

This investment policy shall be reviewed at least annually to ensure its consistency with the overall objectives of preservation of principal liquidity, rate of return and its relevance to current law and financial and economic trends.

### SUMMARY OF INVESTMENT LIMITATIONS

| Investment Type   | Government Code Reference | Limit <sup>1</sup> Per Investment Type(s) | Limit <sup>1</sup> Per Institution | Minimum <sup>2</sup> Ratings | Maxium <sup>2</sup> Allowable Maturity |
|---|---------------------------|---|------------------------------------|------------------------------|--|
| United States Treasuries  | §53601 (b)                | None                                      | None                               | None                         | 5 years                                |
| United States Federal Agencies & Government-Sponsored Enterprises | §53601 (f)                | None                                      | None                               | None                         | 5 years                                |
| State of California Notes & Bonds                                 | §53601 (c) & 53601 (e)    | None                                      | None                               | None                         | 5 years                                |
| Notes & Bonds of Other 49 States                                  | §53601 (d)                | None                                      | None                               | None                         | 5 years                                |
| California Local Agency Debt                                      | §53601 (a), (c) & (e)     | None                                      | None                               | None                         | 5 years                                |
| Medium-Term Notes   | §53601 (k)                | 30%                                       | None                               | A                            | 5 years                                |
| Negotiable Certificates of Deposit                                | §53601 (i)                | 30%                                       | None                               | N/A                          | 5 years                                |
| Bankers Acceptances   | §53601 (g)                | 40%                                       | 30%                                | A-1                          | 180 days                               |
| Commercial Paper  | §53601 (h) & 53635 (a)    | 40%                                       | 10%                                | A-1 (short)<br>A (long)      | 270 days                               |
| Reverse Repurchase Agreements                                     | §53601 (j)                | 20%                                       | None                               | Primary Dealer               | 92 days                                |
| Local Agency Investment Fund (LAIF)                               | §16429.1                  | N/A                                       | N/A                                | N/A                          | N/A                                    |
| California Asset Management Program (CAMP)                        | §53601(p)                 | N/A                                       | N/A                                | N/A                          | N/A                                    |
| Money Market Mutual Funds   | §53601(l)                 | 20%                                       | 10%                                | AAA                          | N/A                                    |
| Commercial or Savings Bank, Savings and Loan or Credit Union      | §53601.8 & 53635.8        | 30%                                       | 10%                                | N/A                          | N/A                                    |
| Supranationals  | §53601(q)                 | 30%                                       | N/A                                | AA                           | 5 years                                |

<sup>1</sup> Based on total of surplus funds at the time the investment decision is made.

<sup>2</sup> At the time of purchase.

## GLOSSARY

**Accreted Discount** – The increase in the value of a discounted instrument as time passes and it approaches maturity. The value of the instrument will accrete (grow) at the interest rate implied by the discounted issuance price, the value at maturity and the term to maturity.

**Accrued Interest** – Interest that has accumulated by has not yet been paid from the most recent interest payment date or issue date to a certain date.

**Amortization** – The reduction of debt through regular payment of principal scheduled to complete repayment by maturity. Usually the payment of interest is incorporated to compensate the lender over the life of the debt.

**Bankers' Acceptance** – A time bill of exchange drawn on and accepted by a commercial bank to finance the exchange of goods. When a bank “accepts” such a bill, the time draft becomes, in effect, a predated, certified check payable to the bearer at some future specified date. Little risk is involved for the investor because the commercial bank assumes primary liability once the draft is accepted.

**Basis point** – One basis point is equal to 1/100 of 1%. For example, if interest rates increase from 4.25% to 4.5%, the difference is referred to as a 25-basis-point increase.

**Book Value** – The value of a security as carried in the records of an investor. Generally, this is the initial outlay for the investment and may be net or gross of expenses such as trading costs, services charges, etc.

**Bond** – A debt investment in which an investor loans money to an entity (corporate or governmental) that borrows the funds for a defined period of time at a fixed interest rate. Bonds are used by companies, municipalities, states and U.S. and foreign governments to finance a variety of projects and activities.

**Broker/Dealer** – Any person engaged in the business of effecting transactions in securities in this state for the account of others or for his/her own account. Broker/Dealer also includes a person engaged in the regular business of issuing or guaranteeing options with regard to securities not of his/her own issue.

**Commercial Paper** – Short-term, unsecured promissory note issued in either registered or bearer form and usually backed by a line of credit with a bank. Maturities do not exceed 270 days and generally average 30 – 45 days.

**Coupon Rate** – The interest rate stated on a bond when it is issued. The coupon is typically paid semi-annually.

**Current Yield** – The annual income (interest or dividends) divided by the current price of the security. Since the mathematical calculation relies on the current market value rather than the investor's cost, current yield is unrelated to the actual return the investor will earn if the security is held to maturity.

**CUSIP Numbers** – An acronym for Committee on Uniform Security Identification Procedures, CUSIP numbers are identification numbers assigned to each maturity of a security issue and usually printed on the face of each individual security in the issue. The CUSIP numbers are intended to facilitate identification and clearance of securities.

**Debt Instrument** – An instrument or promissory note which evidences and documents the terms of the loaning of funds from one party to another. Typically, the instrument contains the loan date, the maturity date, the repayment provisions, and the interest rate of the borrowing.

**Default** – The failure to pay debt obligations as agreed in the terms of the debt

**Discount** – The condition of the price of a bond that is lower than par. The discount equals the difference between the price paid for a security and the security's par value.

**Earnings Apportionment** – The quarterly interest distribution to the Pool participants.

**Fair Value** – The amount at which an investment could be exchanged in a current transaction between willing parties, other than a forced or liquidation sale.

**Fannie Mae (FNMA, Federal National Mortgage Association)** – A government-sponsored enterprise (GSE) that was created in 1938 to expand the flow of mortgage money by creating a secondary mortgage market. Fannie Mae is a publicly traded company which operates under a congressional charter that directs Fannie Mae to channel its efforts into increasing the availability and affordability of homeownership for low-, moderate-, and middle-income Americans.

**Federal Government Agency** – Debt issued by government sponsored entities (GSE) to facilitate various types of lending. For example, the Federal Farm Credit Bank provides funds to farmers and FNMA provides funds to the real estate mortgage markets.

**Freddie Mac (FHLMC, Federal Home Loan Mortgage Corp.)** – A stockholder owned government sponsored enterprise (GSE) chartered by Congress in 1970 to keep money flowing to mortgage lenders in support of homeownership and rental housing for middle-income Americans. The FHLMC purchases, guarantees and securitizes mortgages to form mortgage-backed securities. The mortgage-backed securities that it issues tend to be very liquid and carry a credit rating close to that of U.S. Treasuries.

**Government-Sponsored Enterprise (GSE)** – Privately held corporations with public purposes created by the U.S. Congress to reduce the cost of capital for the certain borrowing sectors of the economy. Members of these sectors include students, farmers and homeowners.

**Local Agency Investment Fund (LAIF)** – The State of California investment pool in which money of local agencies is pooled as a method for managing and investing local funds.

**Market Value** – The price at which a security is trading and could presumably be purchased or sold.

**Maturity** – The date upon which the principal of a security becomes due and payable to the holder.

**Money Market Mutual Fund** – A mutual fund with investments directed in short-term money market instruments only, which can be withdrawn daily without penalty

**Par Value** – The face value of a bond. Par value is important for a bond or fixed-income instrument because it determines its maturity value as well as the dollar value of coupon payments.

**Premium** – The condition of the price of a bond that is higher than par. The premium equals the difference between the price paid for a security and the security's par value.

**Principal** – The face amount of a security not taking into account discounts or premiums. The amount borrowed or the amount still owed on a loan, separate from interest.

**Repurchase Agreement (Repo)** – A form of short-term borrowing for dealers in government securities. The dealer sells the government securities to investors, usually on an overnight basis, and buys them back the following day. For the party selling the security (and agreeing to repurchase it in the future) it is a repo; for the party on the other end of the transaction, (buying the security and agreeing to sell in the future) it is a reverse repurchase agreement.

**Reverse Repurchase Agreement** – The purchase of securities with the agreement to sell them at a higher price at a specific future date.

**Registered Warrants** – A “promise to pay” with interest, that is issued by the State of California when there is not enough cash to meet all of the State's payment obligations.

**Settlement Date** – The date on which the purchase or sale of securities is executed. For example, in a purchase transaction, the day the securities are physically delivered or wired to the buyer in exchange for cash is the settlement date.

**Supranational Bonds** – These bonds are issued when two or more central governments issue foreign bonds to promote economic development for the member countries. These include bonds issued by the International Bank for Reconstruction and Development, or World Bank, and the International American Development Bank.

**Trade Date** – The date and time corresponding to an investor's commitment to buy or sell a security.

**U.S. Treasury Obligation** – Direct obligations of the United States Treasury whose payment is guaranteed by the United States of America.

**Weighted Average Maturity (WAM)** - The weighted average of the time until all securities in a portfolio mature.



## TEMPORARY CONSTRAINTS AND RESTRICTIONS ON INVESTMENTS

1. County of Mono restricts the purchase of any retail products issued by Wells Fargo and Deutsche Bank from January 1, 2021 until December 31, 2025.



OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS

## REGULAR AGENDA REQUEST

Print

**MEETING DATE** January 16, 2024

**Departments: Community Development**

**TIME REQUIRED**

**SUBJECT**

Second Reading: Proposed Ordinance Establishing Title 20, "Chapter 20.20 – Density Bonus Ordinance," in the Mono County Code to Implement the State Density Bonus Law

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

### AGENDA DESCRIPTION:

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Proposed ordinance establishing Title 20, "Chapter 20.20 – Density Bonus Ordinance," in the Mono County Code to Implement the State Density Bonus Law.

### RECOMMENDED ACTION:

Find that the ordinance is not a project under CEQA Guidelines §15378(b)(2) because it establishes general policy and procedures for compliance with state law, and development projects utilizing the ordinance are separately subject to CEQA compliance. Direct staff to file a Notice of Exemption. Adopt proposed ordinance.

### FISCAL IMPACT:

None. Staff time to process applications is included in the Department's budget.

**CONTACT NAME:** Wendy Sugimura

**PHONE/EMAIL:** 760-924-1814 / wsugimura@mono.ca.gov

### SEND COPIES TO:

### MINUTE ORDER REQUESTED:

YES  NO

### ATTACHMENTS:

Click to download

[staff report](#)

[Ordinance](#)

[Exhibit A to ordinance](#)

**History**

| <b>Time</b>         | <b>Who</b>                   | <b>Approval</b> |
|---------------------|------------------------------|-----------------|
| 12/29/2023 12:38 PM | County Counsel               | Yes             |
| 1/8/2024 2:35 PM    | Finance                      | Yes             |
| 1/10/2024 8:41 AM   | County Administrative Office | Yes             |

# Mono County Community Development Department

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January 16, 2024

**TO:** The Honorable Board of Supervisors

**FROM:** Wendy Sugimura, Director

**RE:** Second Reading: Proposed Ordinance Establishing Title 20, “Chapter 20.20 – Density Bonus Ordinance,” in the Mono County Code to Implement the State Density Bonus Law

## **BACKGROUND**

California’s Density Bonus Law (DBL) is a mechanism that allows developers to obtain more favorable local development requirements in exchange for offering to build or donate land for affordable or senior units, and is a state mandate with which the County must comply. The intent of the DBL is to help make the development of affordable and senior housing economically feasible and includes tools beyond increased density such as reduced parking requirements, waiver requests, and concessions for deviations from development standards such as setbacks, height requirements, etc.

## **DISCUSSION**

The County’s implementation of the State Density Bonus Law (Government Code §65915, et seq.) is generally codified in Mono County General Plan Land Use Element §04.100.C. The proposed ordinance includes detail and guidance to assist with the implementation of the DBL, such as definitions of terms, application procedures and required information, standards for affordable units, and affordability terms. In addition, the proposed ordinance incorporates changes enacted by the various housing laws passed by the State legislature in 2023.

## **CEQA COMPLIANCE**

This ordinance establishes policies and procedures for compliance with the State’s DBL and is therefore not a project per California Environmental Quality Act (CEQA) Guidelines §15378(b)(2). Any development project applying for a density bonus under state law and this ordinance is subject to separate analysis under and compliance with CEQA as part of the approval process.

## **ATTACHMENTS**

1. ORD24-\_\_ Establishing Title 20, “Chapter 20.20 – Density Bonus Ordinance” of the Mono County Code.
2. ORD24-\_\_ Exhibit A: Chapter 20.20 – Density Bonus Ordinance



ORDINANCE NO. ORD24-\_\_

**AN ORDINANCE OF THE MONO COUNTY BOARD OF SUPERVISORS  
ESTABLISHING TITLE 20, "CHAPTER 20.20 – DENSITY BONUS ORDINANCE," IN  
THE MONO COUNTY CODE TO IMPLEMENT THE STATE DENSITY BONUS LAW**

**WHEREAS**, the State Density Bonus Law (DBL), currently Government Code §65915, et seq., is a state mandate with which the County must comply; and

**WHEREAS**, the DBL allows developers to obtain more favorable local development requirements in exchange for offering to build or donate and for affordable or senior units; and

**WHEREAS**, the intent of the DBL is to help make the development of affordable and senior housing economically feasible and includes tools beyond increased density such as reduced parking requirements, waiver requests, and concessions for deviations from development standards such as setbacks, height requirements, etc.; and

**WHEREAS**, Mono County General Plan Land Use Element §04.100.C. currently codifies compliance with the DBL; and

**WHEREAS**, this Ordinance, as set forth in Exhibit A, provides detail and guidance to assist with the implementation of the DBL in compliance with state law and General Plan Land Use Element §04.100.C., such as definitions of terms, application procedures and required information, standards for affordable units, and affordability terms; and

**WHEREAS**, this Ordinance is not a project under CEQA Guidelines §15378(b)(2) because it establishes general policy and procedures for compliance with the State Density Bonus Law, and development projects utilizing the ordinance are separately subject to CEQA compliance.

**NOW, THEREFORE, BE IT ORDAINED** that the Mono County Board of Supervisors hereby finds as follows:

**SECTION ONE:** That Chapter 20.20 of the Mono County Code entitled "Density Bonus Ordinance" is established to read as set forth in Exhibit A attached hereto and incorporated herein by this reference.

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**SECTION TWO:** This ordinance shall become effective 30 days from the date of its adoption and final passage. The Clerk of the Board of Supervisors shall post this ordinance and also publish the ordinance in the manner prescribed by Government Code section 25124 no later than 15 days after the date of this ordinance’s adoption and final passage. If the Clerk fails to publish this ordinance within said 15-day period, then the ordinance shall not take effect until 60 days after the date of publication.

**APPROVED AND ADOPTED** this 16<sup>th</sup> day of January 2024, by the following vote:

- AYES :**
- NOES :**
- ABSENT :**
- ABSTAIN :**

\_\_\_\_\_  
Chair

**ATTEST:**

**APPROVED AS TO FORM:**

\_\_\_\_\_  
Clerk of the Board

\_\_\_\_\_  
County Counsel

## **EXHIBIT A TO ORD24-\_\_\_, DENSITY BONUS ORDINANCE**

### ***Chapter 20.20 – Density Bonus Ordinance***

#### **20.20.010. Title.**

This chapter shall be known and may be cited as the Mono County Density Bonus Ordinance.

#### **20.20.020. Definitions.**

As used in this chapter, the following terms shall have the following meanings:

- A. "Concession" shall have the same meaning as the term "concession or incentive" pursuant to the state density bonus law, as currently defined in Government Code section 65915, subdivision (k).
- B. "Density bonus" means a density increase over the otherwise maximum allowable residential density for a housing development as of the date of application by the applicant, or, if elected by the applicant, a lesser percentage of density increase, including, but not limited to, no increase in density.
- C. "Housing development" means any of the following:
  - 1. A development project for five or more residential units, including a mixed-use development;
  - 2. A subdivision consisting of residential units or unimproved residential lots;
  - 3. A common interest development as defined in section 4100 of the Civil Code consisting of residential units or unimproved residential lots;
  - 4. A project to convert and substantially rehabilitate an existing commercial building to residential use; or
  - 5. The substantial rehabilitation of an existing structure designed for human habitation that has been divided into two or more legally created independent living quarters, where the result of the rehabilitation would be a net increase in available residential units.
- D. Identifiable and Actual Cost Reduction to Provide for Affordable Housing Cost
  - 1. An "identifiable and actual cost reduction to provide for affordable housing cost" means a reasonably quantifiable cost reduction that would be achieved for a housing development through a concession unless it can be shown by credible, substantial evidence that total cost reductions resulting from all proposed concessions would substantially exceed:

- 
- a. In the case of a rental housing development, the approximate difference between the amount of the debt service that the development's affordable units will support and the cost to construct those units; and
  - b. In the case of a for-sale housing development, the approximate difference between the combined total restricted sales prices of the affordable units in the housing development and the combined unrestricted value of those units.
2. Notwithstanding the foregoing definition, an "identifiable and actual cost reduction to provide for affordable housing cost" shall be deemed to exist whenever the applicant demonstrates by credible, substantial evidence that a project at the proposed density and with the proposed level of affordability would be economically infeasible without the requested concession or concessions because of the affordable component, but would be economically feasible with the inclusion of the requested concession or concessions.
- E. "Maximum allowable residential density" means the maximum residential density allowed for a housing development under applicable county policies. In case of any conflict between the land use element of the general plan and any zoning regulation, if applicable, the greater density shall prevail. For purposes of this definition, residential density shall be calculated based upon the gross acreage of a housing development, regardless of how it may be calculated by the county for other purposes. If a housing development is proposed to be located on any property that includes a parcel or parcels for which no maximum density is established, then the maximum allowable residential density for the housing development shall be the base density as established by the applicant pursuant to Section 20.20.050.C of this code.
- G. "Reasonable documentation to establish eligibility for a concession" means a credible written explanation or other documentation demonstrating to the reasonable satisfaction of the community development director or designee that a concession will achieve an identifiable and actual cost reduction to provide for affordable housing cost.
- H. "State density bonus law" means Government Code section 65915, et seq., as the same may be renumbered or amended from time to time.

### **20.20.030 Application of this chapter.**

This chapter shall apply to any housing development that is entitled to receive a density bonus pursuant to the state density bonus law.



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### **20.20.040 Adoption of state density bonus law.**

The state density bonus law is hereby adopted by reference.

### **20.20.050 Application Procedures.**

- A. A density bonus request shall be considered by the approval authority for the housing development. An applicant for a density bonus pursuant to the state density bonus law shall submit a density bonus report together with the application for the housing development. The community development director or designee shall ensure that all application checklists made available by the county to applicants for housing development projects contain a reference to this section or attach a density bonus report form that applicants may use. The density bonus report form shall contain the following information:
1. The basis under the state density bonus law on which the applicant is claiming a density bonus;
  2. An identification of the maximum density bonus to which the housing development is entitled on the basis requested;
  3. An identification of any concession(s) sought and reasonable documentation to establish eligibility for the concession(s);
  4. An identification of any waiver(s) sought;
  5. If the housing development is proposed on any property that includes a parcel or parcels with existing dwelling units or dwelling units that have been vacated or demolished in the five-year period preceding the application, an explanation of how the project meets the state density bonus law's replacement housing requirements, if applicable, currently codified at Government Code section 65915, subdivision (c)(3); and
  6. An identification of any parking reduction sought pursuant to the state density bonus law.
- B. If the applicant's proposal for concessions or waivers changes after the application is complete, the applicant shall submit an amended density bonus report that includes all the information required under subdivision (A) above.
- C. If the housing development is proposed to be located on any property that includes a parcel or parcels for which no maximum density is established by the general plan or zoning, then the applicant shall determine a base density for the housing development by determining the maximum number of units that could be provided by a hypothetical housing development consistent with all applicable development standards. The average unit size for the hypothetical housing development shall be at least as large as the average unit size for the housing development proposed. The density bonus report for the housing development shall include calculations

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and rough drawings for the hypothetical housing development used to determine the base density.

- D. If the density bonus report submitted for a housing development is incomplete, county planning staff shall provide the applicant notice of such incompleteness pursuant to the Permit Streamlining Act, Government Code section 65920, et seq.
- E. If it is unclear why any development standard from which a waiver is sought would have the effect of physically precluding the construction of the housing development at the density and with any concession(s) or parking ratio reduction sought, then county planning staff shall be entitled to request an explanation before or after the application for the housing development project is accepted as complete, pursuant to Government Code section 65944. This can be done, for example, by identifying on a plan sheet the proposed unit(s) or portions of proposed unit(s) that would have to be eliminated to comply with the development standard.
- F. If a proposed housing development would be inconsistent with the state density bonus law, then county planning staff shall provide the applicant notice of such inconsistency pursuant to the Housing Accountability Act, Government Code section 65589.5.

#### **20.20.060 Standards.**

Unless the approval authority grants an exception to any of these requirements for good cause shown, affordable units provided to meet state density bonus law requirements shall be comparable in size and material to market rate units in the same housing development, shall be dispersed throughout the housing development, and shall be indistinguishable from market rate units from the exterior of the units.

#### **20.20.070 Affordable housing agreements.**

- A. Affordable rental units provided by a housing development to meet the requirements of this chapter shall be subject to an affordable housing agreement recorded against the housing development with a 55-year term commencing upon the issuance of certificates of occupancy; provided that a longer period shall apply if required by another public financing source or law. The form of the affordable housing agreement shall be approved by county counsel.
- B. For-sale affordable units provided by a housing development to meet both the requirements of the state density bonus law and applicable housing mitigation requirements shall be subject to a recorded affordable housing agreement approved as to form by county counsel. The affordable housing agreement shall, at a minimum, require that:

- 
1. Each for-sale affordable unit shall be sold to an income qualified household at an affordable housing cost, as defined in the affordable housing agreement; and
  2. Each for-sale affordable unit shall be sold to the initial purchaser subject to a recorded resale restriction agreement approved as to form by county counsel, which shall:
    - a. Have a 45-year term or a longer term if required by another public financing source or law;
    - b. Restrict the resale price of the unit to an affordable housing cost, as defined in the resale restriction agreement; and
    - c. Require that if the unit is sold to a subsequent purchaser during the term of the agreement, the purchaser shall purchase the unit subject to a resale restriction agreement approved as to form by county counsel with a new 45-year term or a longer term if required by another public financing source or law.
- C. Unless otherwise required by another public financing source or law, a for-sale unit provided to meet state density bonus law requirements that is not necessary to meet the county's housing mitigation requirements shall be sold to an income qualified household subject to an equity sharing agreement as set forth in the state density bonus law.
- D. Nothing herein shall be construed to prevent a for-sale affordable unit from being sold to a nonprofit housing corporation when expressly authorized by state law.



OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS

## REGULAR AGENDA REQUEST

Print

**MEETING DATE** January 16, 2024

**Departments: Community Development**

**TIME REQUIRED** PUBLIC HEARING: 9:00 AM (20 minutes)

**PERSONS APPEARING BEFORE THE BOARD**

Aaron M. Washco, Planning Analyst

**SUBJECT** PUBLIC HEARING: Apogee Farms Cannabis Cultivation: General Plan Amendment and Specific Plan

### AGENDA DESCRIPTION:

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Consider a proposed cannabis cultivation project near Benton, which requires a General Plan Amendment to change the Land Use Designation of two parcels (APNs 025-020-013 and 025-040-002) from Rural Residential-40 to Specific Plan, and adoption of the Apogee Farm Specific Plan which sets develop standards and policies and makes use permit findings for commercial cannabis activities and overhead utility lines. A mitigated negative declaration and mitigation, monitoring and reporting program are proposed in compliance with the California Environmental Quality Act.

### RECOMMENDED ACTION:

1. Conduct a public hearing on the General Plan Amendment, the Apogee Farm Specific Plan, and the associated Mitigated Negative Declaration environmental report, receive any additional public comments, deliberate the project, and make any desired modifications.
2. Following the public hearing and project deliberations, certify the Mitigated Negative Declaration (MND); adopt the Mitigation Monitoring and Reporting Program; and adopt the proposed resolution and adopt proposed ordinance adopting GPA 24-01 and the Apogee Farm Specific Plan, which also includes a Use Permit for commercial cannabis and overhead power.

### FISCAL IMPACT:

Approval of the General Plan Amendment and Specific Plan allow the landowner to conduct a commercial cannabis business, resulting in increased tax revenue for the County from these parcels. Note, cannabis taxes derived from cultivation are waived until June 30, 2025.

**CONTACT NAME:** Aaron M. Washco

**PHONE/EMAIL:** (760) 924-1810 / [awashco@mono.ca.gov](mailto:awashco@mono.ca.gov)

### SEND COPIES TO:

### MINUTE ORDER REQUESTED:

YES  NO

### ATTACHMENTS:

| Click to download  |
|--|
| <a href="#">☐ staff report</a>                                   |
| <a href="#">☐ 1 Apogee Farm Specific Plan - REDLINE</a>          |
| <a href="#">☐ 2 Apogee Farm IS/MND</a>                           |
| <a href="#">☐ 3 Apogee Farm IS/MND Appdx A – MMRP</a>            |
| <a href="#">☐ 4 Appendix B – Air Quality &amp; GHG</a>           |
| <a href="#">☐ 5 Appendix C – Plants</a>                          |
| <a href="#">☐ 6 Appendix D – Native American Correspondence</a>  |
| <a href="#">☐ 7 Appendix E – Response to Comments</a>            |
| <a href="#">☐ 8 Planning Commission Resolution</a>               |
| <a href="#">☐ 9 GPA Resolution &amp; Specific Plan Ordinance</a> |
| <a href="#">☐ 10 Public Hearing notice</a>                       |

### History

| Time               | Who                          | Approval |
|--------------------|------------------------------|----------|
| 1/11/2024 9:45 AM  | County Counsel               | Yes      |
| 1/8/2024 2:35 PM   | Finance                      | Yes      |
| 1/11/2024 10:21 AM | County Administrative Office | Yes      |

# Mono County Community Development Department

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Planning Division

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[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

January 16, 2024

**To: The Mono County Board of Supervisors**

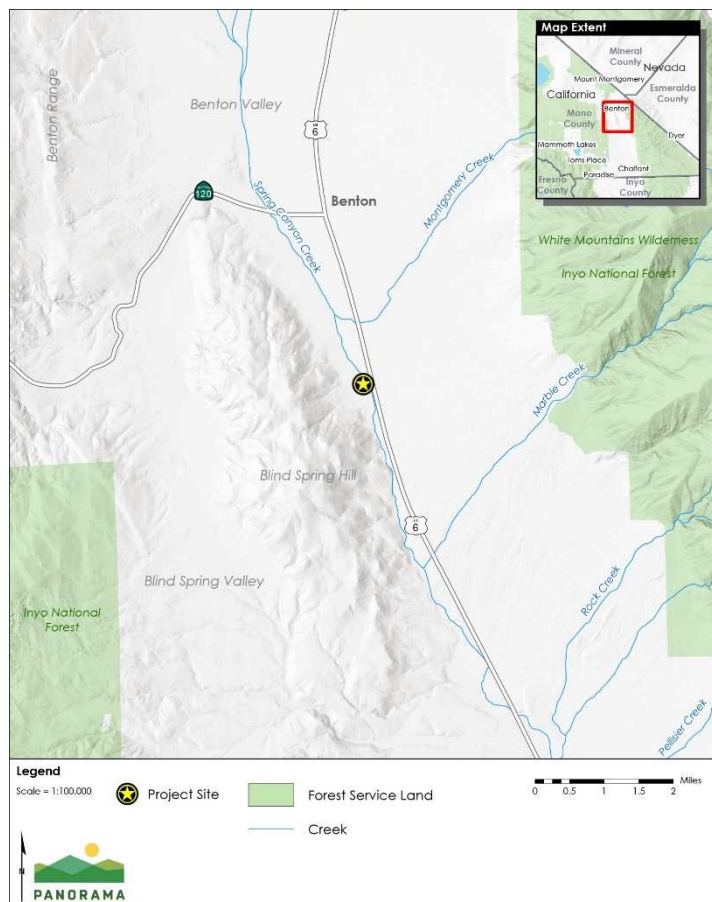
**From:** Aaron M. Washco, Planning Analyst  
Wendy Sugimura, Director

**Re:** Apogee Farm cannabis cultivation project: 1) Certification of Mitigated Negative Declaration and adoption of the Mitigation, Monitoring and Reporting Program; 2) Approval of a General Plan Amendment for a proposed change of Land Use Designation from Rural Residential to Specific Plan; and 3) Approval of proposed Specific Plan.

## FISCAL IMPACT

Approval of the General Plan Amendment and Specific Plan allow the landowner to conduct a commercial cannabis business, resulting in increased tax revenue for the County from these parcels.

Figure 1. Project location



## BACKGROUND

The applicant is requesting a change to the land use designation (LUD) for two adjacent properties located south of Benton along U.S. Route 6 (US 6), APNs 025-020-013 (40-acres) and 025-040-002 (37.9-acres). The designation change requested is from Rural Residential, 40-acre minimum (RR-40), to Specific Plan (SP) for the purpose of conducting a commercial cannabis operation. A General Plan Amendment is required to change land use designations and the SP designation requires the creation and approval of a Specific Plan. For this project, staff worked with the applicant to write the Apogee Farm Specific Plan, consistent with the California Government Code section 65450-65457, Mono County Code Title 19, and Mono County General Plan Chapter 36, *Specific Plans* (see Attachment 1). The SP designation is intended to provide for planned development in areas outside existing communities, or on large parcels of land within or adjacent to existing communities. The SP designation may also be applied to an area to provide direction for potentially conflicting or incompatible land uses.

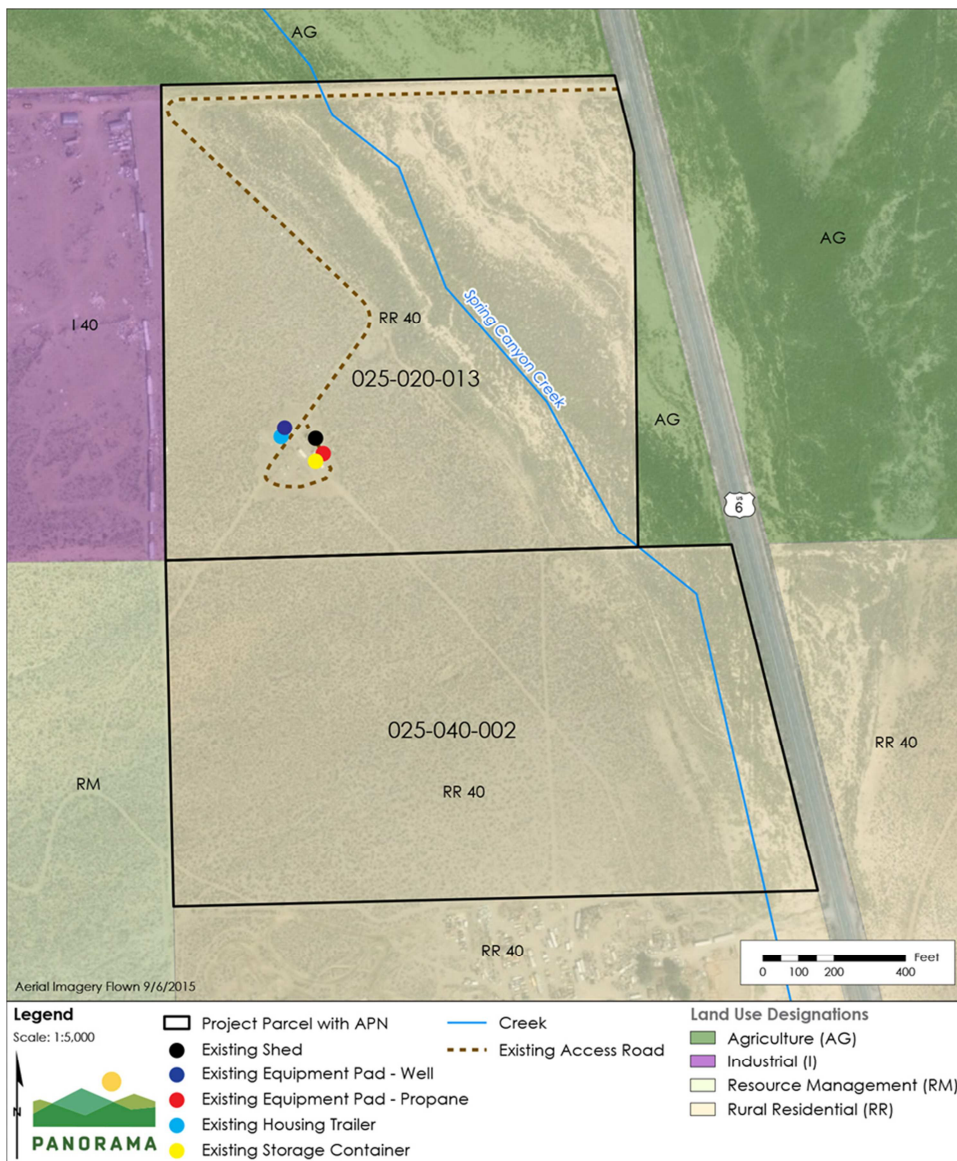
The Apogee Farm Specific Plan includes the Conditional Use Permit for commercial cannabis activity, and findings to allow overhead power to serve the property. Approval of the Specific Plan shall therefore include an approval of the Conditional Use Permit.

The applicant is requesting to change the land use designations of both parcels to Specific Plan (SP), for the purpose of creating a commercial cannabis operation on the northern parcel only, APN 025-020-013. Commercial cannabis operations are prohibited in residential land use designations, and outdoor cultivation is required to be setback 300 feet from the property line of any neighboring parcel under a different land use designation. To meet these requirements, the two parcels will be redesignated to SP, and the cannabis operation will occur on the north parcel only. The proposed Specific Plan would authorize commercial cannabis activities by incorporating the required Conditional Use Permit. The Specific Plan would allow for additional uses, including limited agricultural use and commercial cannabis cultivation up to 10,000 sf (outdoor, indoor, and mixed light), processing, and distribution. Uses are prohibited from occurring within sensitive habitat areas. Uses that are not currently proposed, and which would require a CUP under the Specific Plan, are not evaluated further and would require a Specific Plan Amendment.

The property currently contains a well, propane tank, shed, housing trailer, and cargo container (see Figure 2). The well was permitted in June 2009 (Permit #26-09-25), however other uses were placed on the property by the applicant without proper permitting. No complaints or violations have been filed against the property, and a Condition of Approval for the project, located within the Specific Plan, will require all uses receive the proper permitting.

All project documents are available at <https://www.monocounty.ca.gov/planning/page/apogee-farms-specific-plan-and-mitigated-negative-declaration> and the Mono County Community Development Department at 1290 Tavern Road, Suite 138, Mammoth Lakes, California. Hard copies can be provided for the cost of reproduction.

Figure 2. Project Site



### Surrounding Land Use Designations

The land use designations adjacent to the two parcels are described below:

|               |   |
|---------------|---|
| <b>East:</b>  | Private land – Agriculture (AG)<br>Private land – Rural Residential (RR)              |
| <b>West:</b>  | Private land – Industrial (I)<br>Bureau of Land Management – Resource Management (RM) |
| <b>South:</b> | Private land – Rural Residential (RR)   |
| <b>North:</b> | Private land – Agriculture (AG)   |

The project site is adjacent to US 6 south of Benton in an area of low-density and agricultural properties (see Figure 3). To the north, northeast, and partial east side of the project site is a single, 466-acre property designated Agriculture (AG). Only the northeast portion of this parcel is in agricultural production, and the property contains a single residential unit 0.9-miles from the proposed cannabis operation. The Rural Residential-40 (RR) parcel to the east is not developed and may not be further subdivided. The Rural Residential-40 parcel to the south contains a scrapyard and residential unit 0.3-miles from the project site. This



site contains the nearest neighbor, and the applicant intends to buffer this neighbor from the cannabis operation using the undeveloped southern parcel included in this project. The southwest parcel designated Resource Management (RM) is undeveloped, owned by the Bureau of Land Management, and is 402 acres. The parcel to the west is designated Industrial-40 (I), it is 40 acres, and contains a non-operational scrap yard. There is no residential use on the property and access is provided by a recorded easement through the project site.

Figure 3. Surrounding land uses.



**PROJECT DESCRIPTION**

The applicant initiated a General Plan Amendment to change the land use designation from Rural Residential – 40 (RR-40) to Specific Plan (SP), which then requires the development and approval of a specific plan.

The Apogee Farm Specific Plan (see Attachment 1) has primary objectives to 1) ensure the compatibility of the commercial cannabis operation site with the land use designation; and 2) regulate commercial cannabis cultivation, processing, and distribution of cannabis products in the County in a manner consistent with State and local regulations and allow the orderly development and oversight of the commercial cannabis operation businesses in the County; and 3) protect sensitive resources identified on site and limit groundwater consumption.

The Specific Plan provides development standards and permitted uses similar to the Rural Residential designation, but with the

addition of commercial cannabis activities (see Table 2 below). The Specific Plan will outright permit the same uses as the previous RR designation. Minor alterations exempt from CEQA are allowed by a Director Review Permit, and any uses that would require a Use Permit are subject to a Specific Plan Amendment. Development standards including maximum lot coverage, building and population density, and building height are the same as the RR designation, however setback requirements have been increased for side and rear yards from 30’ to 50’ similar to the Agriculture (AG) designation.

**Table 2. Existing and Proposed Land Use Designations**

| Uses and Development Standards | Rural Residential (RR-40)– Existing Land Use  | Specific Plan– Proposed Land Use   |
|--------------------------------|---|--|
| Permitted Uses                 | <ul style="list-style-type: none"> <li>• Single-family dwelling</li> <li>• Small-scale agriculture</li> <li>• Accessory buildings and uses</li> <li>• Animals and pets</li> <li>• Home occupations</li> <li>• Manufactured home used as single-family dwelling</li> </ul> | <ul style="list-style-type: none"> <li>• Single-family dwelling</li> <li>• Animals and pets (see Animal Standards Section 04.270).</li> <li>• Manufactured home used as a single-family dwelling<sup>a</sup></li> <li>• Accessory Dwelling Unit (as</li> </ul> |

| Uses and Development Standards    | Rural Residential (RR-40)– Existing Land Use   | Specific Plan– Proposed Land Use  |
|-----------------------------------|--|---|
|                                   | <ul style="list-style-type: none"> <li>• Accessory Dwelling Unit (ADU) or Junior Accessory Dwelling Unit (JADU)</li> <li>• Transitional and Supportive Housing</li> <li>• Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act</li> </ul>  | <p>prescribed in Chapter 16 – Accessory Dwelling Units)</p> <ul style="list-style-type: none"> <li>• Accessory buildings<sup>b</sup> and uses</li> <li>• Farm labor housing</li> <li>• Home occupations (as prescribed in Section 04.290)</li> <li>• Non-commercial composting facilities where the operation does not create a nuisance problem and has less than 100 cubic yards of material on site at any given time</li> </ul> |
| Uses Subject to Director’s Review | <ul style="list-style-type: none"> <li>• None</li> </ul>   | <ul style="list-style-type: none"> <li>• Minor alterations involving no expansion of square footage or intensification of uses and exempt from CEQA</li> </ul>  |
| Uses Subject to a Use Permit      | <ul style="list-style-type: none"> <li>• Recreational amenities (e.g., art galleries, country clubs, golf courses)</li> <li>• Kennel</li> <li>• Construction of an accessory building prior to construction of the main building</li> <li>• Mobile home parks</li> <li>• Small-scale agriculture, including limited commercial agricultural activities</li> <li>• Manufactured housing subdivision</li> <li>• Short-term rentals (fewer than 30 consecutive days) in compliance with Chapter 25 of the Land Development Regulations (set forth in Section VI of the Land Use Element) and with a valid Short-term Rental Activity Permit and in compliance with all operational requirements of Chapter 5.65 of the Mono County Code and any applicable area plan policies.</li> </ul>           | <ul style="list-style-type: none"> <li>• Any uses other than a permitted use requires an amendment to this Specific Plan</li> </ul>   |
| Animals and Pets                  | <ul style="list-style-type: none"> <li>• Minimum Lot Area Required: 10,000 square feet</li> <li>• Animal Units<sup>c</sup> Permitted: <ul style="list-style-type: none"> <li>– Less than 1 acre: one unit per 10,000 square feet of lot area with Director Review with notice</li> <li>– 1 to 10 acres: one unit per 10,000 square feet of lot area</li> <li>– More than 10 acres: no limit <ul style="list-style-type: none"> <li>• Restrictions: Except for movement on and off the property, animals shall not be kept, maintained, or used in any other way, inside or outside any structure, within 40 feet of those portions of any structure used for human occupancy, assembly or habitation, other than the residence of the owner or keeper of such</li> </ul> </li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• Animal Units permitted by General Plan Section 04.270:</li> </ul>  |

| Uses and Development Standards | Rural Residential (RR-40)– Existing Land Use   | Specific Plan– Proposed Land Use   |
|--------------------------------|--|--|
| Maximum Lot Coverage           | animals.<br><ul style="list-style-type: none"> <li>40 percent</li> </ul>   | <ul style="list-style-type: none"> <li>40 percent</li> </ul>   |
| Minimum Setbacks               | Buildings <ul style="list-style-type: none"> <li>Front: 50 feet</li> <li>Rear: 30 feet</li> <li>Side: 30 feet</li> </ul> Accessory Buildings Used as Barns or Stables <ul style="list-style-type: none"> <li>Front: 50 feet</li> <li>Rear: 30 feet</li> <li>Side: 30 feet</li> </ul> | Buildings <ul style="list-style-type: none"> <li>Front: 50 feet</li> <li>Rear: 50 feet</li> <li>Side: 50 feet</li> </ul> Accessory Buildings Used as Barns or Stables <ul style="list-style-type: none"> <li>Front: 50 feet</li> <li>Rear: 30 feet</li> <li>Side: 30 feet</li> </ul> |
| Building Density               | <ul style="list-style-type: none"> <li>1 dwelling unit per lot, JADU and an ADU</li> </ul>   | <ul style="list-style-type: none"> <li>1 dwelling unit per lot, JADU and an ADU</li> </ul>   |
| Population Density             | <ul style="list-style-type: none"> <li>5.02 persons per 5 acres or ~1 person per acre</li> </ul>   | <ul style="list-style-type: none"> <li>5.02 persons per 5 acres or ~1 person per acre</li> </ul>   |
| Maximum Building Height        | <ul style="list-style-type: none"> <li>35 feet</li> </ul>  | <ul style="list-style-type: none"> <li>35 feet</li> </ul>  |

Notes:

**Bold** denotes Specific Plan uses that differ from the RR-40 designation.

- a Provided that the unit is less than 10 years old and meets the criteria set forth in Section 04.280. When two mobile homes are on the same parcel, they must: 1) comply with the Accessory Dwelling Unit requirements; or 2) comply with State standards for a mobile-home park and obtain a use permit from the County.
- b Accessory buildings and uses customarily incidental to any of the permitted uses are permitted only when on the same lot and constructed simultaneously with or subsequent to the main building, including barns, stables and other farm outbuildings and quarters for farm labor or other individuals employed on the premises.

The Specific Plan incorporates the equivalent of a use permit for the proposed commercial cannabis activities. The commercial cannabis activity in this case will include up to three greenhouses, a 320-square-foot storage shed, and a processing/distribution facility in the southeast portion of the north parcel, as shown in Figure 4.

Greenhouses would each be approximately 30' x 96', with a height of 16 feet and consist of three 5' x 88' rows of raised beds with spacing between rows for accessing the plants. Corrugated polycarbonate panels would be connected to the greenhouse frame and assembled on site. The panels would be semitransparent to allow sunlight, however, each greenhouse would also be equipped with light-emitting diodes (LED) for supplemental light to extend the light cycle for vegging cannabis plants when daylight hours are limited and not sufficient for the growing plants. Automatic black-out curtains would be installed in each greenhouse to prevent light leakage from dusk to dawn. The cultivation area would be surrounded by a chain link fence with a lockable gate, and with earth-toned screening material to restrict visibility and provide security. Cultivation initially may be conducted indoors as well as outdoors but would be solely indoors after full project build out.

The processing and distribution facility would be 30' x 60' and comply with the California State Building Code. Within this structure, harvested cannabis may be dried, cured, graded, trimmed, rolled, stored, packaged, and labeled in preparation for distribution. Access to the site will require upgrading the road from US 6 to the project site to State Minimum Fire Safe Standards. Electricity to the site is proposed to be above ground. No development is proposed on the south parcel. All structures would consist of dark earth tone colors and/or non-reflective materials to minimize aesthetics impacts and would be approved by the Mono County Planning Division.

The Specific Plan also incorporates the equivalent use permit approval for an overhead line, based on the finding that the exclusive purpose of the overhead line is to serve an agricultural operation (see Attachment 9).

*Figure 4. Project Site Plan*



Aerial Imagery Flown 9/6/2015

**Legend**

Scale: 1:1,000



- |                                       |                                       |                               |
|---------------------------------------|---------------------------------------|-------------------------------|
| Proposed Gravel Access Road           | Proposed Septic Leach Field           | Feet                          |
| Proposed Processing Facility Building | Proposed Cultivation Area Fencing     | Existing Equipment Pad - Well |
| Proposed Greenhouse                   | Existing Equipment Pad - Propane Tank | Existing Shed                 |
| Proposed Storage Shed                 | Existing Housing Trailer              | Existing Storage Container    |
| Proposed Parking Lot                  |                                       |                               |
| Proposed Well Pump House              |                                       |                               |
| Proposed Overhead Power Line          |                                       |                               |

Figure 2. Overhead power line location.



### **COMPLIANCE WITH MONO COUNTY CANNABIS REGULATIONS (CHAPTER 13)**

In addition to General Plan policies and regulations, commercial cannabis activities shall comply with Chapter 13. The following general standards and requirements apply to all commercial cannabis activities permitted in the county:

#### 13.070.C. Site control.

*No commercial cannabis activity shall be allowed within six hundred (600) feet of schools providing instruction to kindergarten or any grades 1 through 12, day care or youth centers, parks, ballfields, playgrounds, libraries, community centers, and licensed child care facilities.*

None of the above-mentioned facilities are located within 600 feet of the site. The Edna Beaman Elementary School, Benton Public library, and nearest public park/ballfield/playground are located approximately 2.3 miles from the project site.

#### 13.070.D. Setbacks

*All commercial cannabis activities shall meet existing setbacks established in General Plan Chapter 4 – Land Use Designations and 4.120 Yards and Setbacks.*

The Apogee Farm's Specific Plan requires minimum setbacks of 50'. For accessory buildings such as barns or stables, setbacks of 30' on the side and rear are permitted. The project meets the required setbacks.

#### 13.070.E. Odor control

*An odor mitigation plan is required to demonstrate that odors generated by the commercial cannabis activity shall not unreasonably impact adjacent properties and uses, or that odor mitigation measures are not applicable due to lack of cannabis-related odor generation, location or siting, design features, or other factors.*

The applicant has provided an odor mitigation plan. The distance from sensitive receptors and prevailing winds are anticipated to mitigate odor generated by outdoor cultivation, and the project will have a less than significant impact with mitigation incorporated, as determined by Section 3.4 of the Mitigated Negative Declaration (see Attachment 2). Greenhouses to be used for indoor cultivation will be equipped with Cannabuster iodine misters, or equivalent, at the exhaust vents to neutralize odors. The applicant will also place a sign at the property's entrance containing the applicant's contact information in the case that a neighbor has any issue with the operation. The applicant is required to notify the County if concerns are raised to him. The County has the ability to require modifications to the odor mitigation plan if odors cause an unforeseen nuisance.

#### 13.070.F. Signage

*A Sign Plan shall be required to demonstrate compliance with General Plan Land Development Regulations, Chapter 4.190 Signs, and Chapter 7 Signs.*

The project will not have signage except the posting of the applicant's contact information, as noted above.

#### 13.070.G. Visual screening

*All Cannabis, Cannabis Products and Cannabis Accessories shall be screened from view from a public right of way to the best of the Permittee's ability.*

A six-foot tall chain link fence will be installed around the cultivation area. The fencing will include screening material of dark, earth tone color to act as a wind break and restrict visibility.

#### 13.070.H. Lighting

*All commercial cannabis activities shall comply with General Plan Land Use Element Chapter 23 – Dark Sky Regulations regardless of activity type or Premise location.*

Lighting will consist of light-emitting diode (LED) greenhouse lighting and LED lighting installed outside the processing and cultivation premise. Lighting in the greenhouses would be used only to extend the light cycle for vegging cannabis plants when daylight hours are limited. Automatic blackout curtains would be installed inside the greenhouse to prevent light leakage from dusk to dawn. Exterior lighting will have a temperature rating not to exceed 3,000 Kelvin (K), will be down-casted and shielded, and compliance with the County's Dark Sky Regulations will be required.

#### 13.070.I. Parking

*A Parking Plan depicting availability and requirements for parking shall be submitted. The Plan shall demonstrate the provision of adequate on-site parking for all employees and allow for loading and unloading.*

The applicant has provided a parking plan. Three parking spaces, including one ADA space, will be provided on the east side of the processing facility and north side of the cultivation area.

#### 13.070.J. Noise

*Noise generation shall comply with the Mono County General Plan Noise Element and Mono County Code, Chapter 10.16.*

Very little noise is anticipated to be generated by the operation on a continual basis. Noise levels shall not exceed 65 dBA at the property line. A generator will be installed west of the processing facility to be used for emergency power, in compliance with County Code Section 10.16 and all applicable state laws and regulations.

#### 13.070.K. Fire Protection.

*All regulations of the local fire district shall be met to ensure adequate access, water availability and other conditions for fire protection.*

The project is within the service district of the White Mountain Fire Department. The department was notified of the project and did not provide any objections. The on-site well and water holding tanks (two 2,600-gallon tanks) will provide emergency water supply in the case of an emergency. The project shall meet State Minimum Fire Safe Regulations, and receive a Will-Serve letter for the Fire Department upon issuance of any building permit.

#### 13.070.L. Security Plan.

*Compliance with the security plan approved under the Cannabis Operation Permit (Mono County Code Chapter 5.60) is required.*

The provided Security Plan will be reviewed by the Mono County Sheriff's Office prior to the Board of Supervisors' hearing for the Cannabis Operation Permit. The applicant will reside onsite to oversee the operation and can promptly report any unauthorized entry or security incidents. Access and facilities will be locked at all times, allowing access only by authorized personnel.

#### 13.070.M. Water Conservation.

*Water conservation measures, water capture systems, or grey water systems shall be incorporated, consistent with the Resource Efficiency Plan policies, to minimize use of water where feasible.*

The applicant will use an efficient watering system, such as drip-irrigation, to minimize the use of water. Daily water usage is estimated to be 600 gallons per day during full operation, and daily water use records will be kept for five years.

#### 13.080.A. Setbacks (Cultivation specific)

*1. Outdoor cultivation areas and all associated structures located on or around the premises shall meet all applicable setback requirements set forth in the Land Use Designation Chapter 02-04.*

*2. Outdoor cultivation areas shall be set back three-hundred (300) feet from 1) existing habitable space under separate ownership, measured from the nearest boundary line of the cultivation area to the nearest point of the habitable space; 2) the property line of any neighboring parcel under a different land use designation; 3) any public or private road or other vehicular path of travel serving, or intended to serve, as access for multiple properties; and 4) any public and formally identified nonmotorized or multi-modal pathway.*

*3. All structures used for indoor cultivation and all structures used for drying, curing, grading, trimming or processing shall comply with the setbacks for the land use designation. There shall be no evidence of cannabis cultivation outside the structure (e.g., the use shall comply with the Visual Screening Plan, Sign Plan, and Mono County Code Chapter 5.60).*

Cultivation areas and all structures meet applicable setback requirements of the Apogee Farm's Specific Plan. Outdoor cultivation shall be setback 370' from west property boundary which has a neighboring parcel under a different land use designation (Industrial), and over 1,600' from the existing habitable space under separate ownership to the south. The facilities will be more than 950' south of the existing access easement this property shares with the neighbor to the west of the property. Indoor cultivation greenhouses and the processing structure will meet required setback distances, and be screened such that there is no evidence of cannabis cultivation.



### 13.080.B. Lighting (Cultivation specific)

*Interior light systems shall include window coverings to confine light and glare to the interior of the structure and be detailed within the Lighting Plan. Light mitigation measure shall be utilized from sunset to sunrise to avoid nighttime glare, as required in California Department of Food and Agriculture State Code 8304.*

The project will include black-out curtains within the greenhouses to prevent light trespassing from dusk until dawn.

## **ENVIRONMENTAL REVIEW, CALIFORNIA ENVIRONMENTAL QUALITY ACT**

Panorama Environmental Consulting, Inc. was retained to complete an Initial Study and environmental analysis.

The Initial Study/Mitigated Negative Declaration (see Attachments 2-7) identifies that the Project could potentially affect the following environmental factors: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Tribal Cultural Resources. The County has incorporated mitigation measures into the project to reduce potential impacts to less than significant. See Attachment 3 for the Mitigation Monitoring and Reporting Plan.

## **PLANNING COMMISSION RECOMMENDATION**

The Planning Commission held a public hearing on the project and Mitigated Negative Declaration on October 3, 2022, and adopted Resolution R22-10 (see Attachment 8) making the following recommendations:

1. Certify the Mitigated Negative Declaration and adopt the Mitigation Monitoring and Reporting Program.
2. Make the required findings and adopt the General Plan Amendment changing the current land use designation of RR-40 to Specific Plan.
3. Make the required findings and adopt the Apogee Farm Specific Plan.
4. Approve the equivalent of a Use Permit for commercial cannabis activities and overhead powerline as part of the Specific Plan.

## **REQUIRED FINDINGS**

Attachment 9 contains a combined Resolution and Ordinance to take the following actions:

- Certify the Mitigated Negative Declaration and adopt the Mitigation Monitoring and Reporting Program.
- The resolution makes the required findings and responses for approving the General Plan Amendment changing the land use designation from RR-40 to Specific Plan.
- The ordinance makes the required findings to adopt the Apogee Farm Specific Plan, including the findings for a use permit for the cannabis activities and overhead powerline.

## **PUBLIC NOTICING**

This project was accepted for processing by the Land Development Technical Advisory Committee (LDTAC) in May 2019. On September 19, 2022, the LDTAC reviewed and approved the Draft Conditions of Approval. The County contracted Panorama Environmental, Inc. for CEQA reporting on September 2, 2019.

Tribal consultation invitations for CEQA under Assembly Bill 52 were sent in May 2021 and February 2022. No consultation requests were received by the County.

Tribal consultation invitations for the General Plan Amendment and Specific Plan under Senate Bill 18 were sent to tribes in June 2020 and March 2022, and no responses were received.

For the October 3, 2022, Planning Commission meetings, notice of this project was published in The Mammoth Times on September 22, 2022, and mailed to property owners within 300' on September 21, 2022.

Notice for the January 16, 2024, Board of Supervisors public hearing was published in the January 4, 2024, edition of the Mammoth Times newspaper and notice was mailed to property owners within 300' of the project on December 20, 2023. (See Attachment 10.)

### **PUBLIC COMMENT**

Comments received on the Draft IS/MND are included in Attachment 7. Three comments were received and responded to within the document. Changes to the IS/MND resulting from comments and internal edits are shown in redline format. Comments received are from governmental agencies and at the time this report was published no comments from area residents have been submitted.

### **ATTACHMENTS**

1. Proposed Apogee Farm Specific Plan
2. Initial Study/Mitigated Negative Declaration
3. Mitigation Monitoring and Reporting Plan
4. Air Quality and Greenhouse Gas Model Calculations
5. Focused Rare Plant Survey
6. Correspondence with Native Americans
7. Responses to Public Comments
8. Planning Commission Resolution R22-10
9. Ordinance 24-01
10. Public Hearing Notice

# MONO COUNTY

## Planning Division

### NOTICE OF DECISION

**USE PERMIT:**

**APPLICANT:** Apogee Farm

**ASSESSOR PARCEL NUMBER:** 025-020-013 & 025-040-002

**PROJECT TITLE:** Apogee Farm General Plan Amendment and Specific Plan

**PROJECT LOCATION:** 23555 US 6, Benton, California

#### CONDITIONS OF APPROVAL

See attached Apogee Farm Specific Plan and the Mitigation Monitoring and Reporting Program for conditions of approval

Pursuant to Sections 47.050 and 47.080 of the Mono County General Plan Land Use Element and Code of Civil Procedure Section 1094.6(b), the decision of the Board of Supervisors became the final decision of the County with respect to the application as of the date of the hearing, at which time the decision was announced on the record. You are hereby notified pursuant to Code of Civil Procedure Section 1094.6(f) that, subject to subdivision (d) of Section 1094.6, the time to bring an action to challenge the decision of the Board of Supervisors is 90 days from the date of the decision.

**DATE OF BOARD OF SUPERVISORS DECISION/APPROVAL:** January 16, 2024

**EFFECTIVE DATE:** January 16, 2024

This approval shall become null and void in the event of failure to exercise the approved rights as set forth in the adopted specific plan.

Ongoing compliance with the above conditions is mandatory. Failure to comply constitutes grounds for revocation and the institution of proceedings to enjoin the subject use.

**DATED:** January 16, 2024

cc:  Applicant  
 Public Works  
 Building  
 Compliance

# Apogee Farm Specific Plan

Prepared by:  
Mono County Community Development  
PO Box 347  
1290 Tavern Road.  
Mammoth Lakes, California 93546  
July 2022

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## **Executive Summary**

The Apogee Farms Specific Plan (the Plan) establishes the land development program for two undeveloped parcels adjacent to the rural community of Benton, CA, within the unincorporated lands of Mono County. Through the General Plan Amendment process, the land use designation of these two parcels is being converted from “Rural Residential – 40 acres” to “Specific Plan” (SP). The SP designation requires the creation of a Specific Plan.

Assessor Parcel Numbers (APNs) 025-040-002 and 025-020-013 are proposed for a commercial cannabis operation known as Apogee Farms, Inc. Apogee Farms will cultivate cannabis to be sold in bulk and distributed from the property. Cultivation areas will be divided into three, 2,880 square-foot (sf) areas for a total of 8,640 sf. Cultivation will initially take place outdoors. After full build out of the project, all cultivation will take place within three greenhouses. Once cannabis is harvested, it may be dried, trimmed, packaged, and labeled on-site before being distributed to retailers. Commercial cannabis activities conducted on site will include cultivation, cannabis processing, and cannabis distribution.

To conduct a commercial cannabis operation within Mono County, a Conditional Use Permit granted by the Planning Commission, a Cannabis Operation Permit granted by the Board of Supervisors, a Mono County Business License and tax certification, and licensing from California State is required. This Plan shall satisfy and include the requirement for a Conditional Use Permit. A hearing for the Cannabis Operation Permit will take place at a future Board of Supervisors meeting on the condition that this Plan is approved, and the properties are redesignated. Following the Mono County hearings, the operation shall receive state licensure, and a Mono County Business License and tax certification, prior to commencing.

The approval of this Plan constitutes a “project” that is subject to review under the California Environmental Quality Act (CEQA). An Initial Study (IS) checklist/ Mitigated Negative Declaration (MND) has been prepared as part of the environmental review process needed to evaluate the potential environmental impacts of the Specific Plan and cannabis facility construction and operation proposed by Apogee Farms. The County has incorporated mitigation measures into the project to mitigate the potentially significant impacts identified in the Initial Study such that no significant impacts will occur and a Mitigation Monitoring and Reporting Plan (MMRP) has been prepared. Project documents can be found online at: <https://www.monocounty.ca.gov/planning/page/apogee-farms-specific-plan-and-mitigated-negative-declaration> or at the Mono County Community Development Department office, 1290 Tavern Road, Mammoth Lakes, CA 93546.

## **I. Introduction & Background**

### **A. Background**

The Apogee Farms Specific Plan (the Plan) applies to APN's 025-020-013 (40.4 acres) & 025-040-002 (37.9 acres) on US Route 6 (US 6) in Benton, California, and constitutes the Land Use Regulation governing the development of the area hereinafter to be referred to as "Apogee Farms." The two parcels are adjacent and share a property boundary. The applicant proposes to live on site while operating the commercial cannabis business.

The project modifies the land use designation of the properties to "Specific Plan (SP)" by General Plan Amendment, which must be adopted by the Mono County Board of Supervisors. The Plan also satisfies the requirement of Mono County Code Chapter 5.60 for a Conditional Use Permit prior to approval of a Cannabis Operations Permit.

### **B. Regulatory Setting**

#### State law

California Government Code Section 65450-65457 contains requirements for the contents of a Specific Plan. This Plan meets all applicable provisions of the code. Appendix A of this Plan contains Code Section 65450-65457.

#### Mono County Authorization

The General Plan Amendment to change the property's land use designation (LUD) will be processed consistent with General Plan Land Use Element Chapter 48, Amendments.

The Specific Plan sets forth the Land Use Designation of the parcels, approved through a General Plan Amendment in compliance with General Plan Chapter 48, Amendments.

Prior to operation of a commercial cannabis activity the following shall be obtained through application procedures with Mono County as necessary:

- A. General Plan Amendment to change the land use designation; and
- B. A Specific Plan pursuant to General Plan Chapter 36, Specific Plans; and
- C. Conditional Use Permit (pursuant to Chapter 32 – Use Permit);
  - This Specific Plan shall satisfy the requirement for a Conditional Use Permit and includes General Plan section 32.010, Required findings, for a Use Permit.
- D. Cannabis Operation Permit per Mono County Code Chapter 5.60; and
- E. Business License from the Mono County Tax Collector, as required by Mono County Code Chapter 5.04; and
- F. Cannabis business tax certificate.

A separate Use Permit is not needed. The Specific Plan includes a Use Permit equivalent with standards and findings, integrating the permit into this Specific Plan. Any future modifications or amendments requiring a use permit modification shall also require a Specific Plan Amendment.

### **C. Relationship of the Specific Plan to the General Plan**

The Mono County General Plan states that Specific Plans are intended to function as implementation mechanisms for the General Plan and establish goals, policies, implementation measures, development

standards, land use, and zoning for an area. A specific plan must be consistent with the General Plan and, once adopted, becomes a part of the General Plan.

Specific plans can be proposed by the Board of Supervisors or a private developer and become the presiding land use designation upon approval. The property owner proposed the project description and Mono County recommended preparation of the Apogee Farms Specific Plan; the proponent (property owner) is responsible for the costs of preparation, review, and project construction.

The Specific Plan land use designation (SP) is intended to provide for planned development in areas outside existing communities, or on large parcels of land within or adjacent to existing communities. The Specific Plan designation may also be applied to an area to provide direction for potentially conflicting or incompatible land uses. The designation may also be used to "plan for future land uses in the vicinity of, and access routes serving" surface mining operations (Public Resource Code § 2764).

Permitted uses will be determined by the Specific Plan in accordance with Government Code §65451 and applicable provisions of the Mono County General Plan, ordinances, and the Mono County Code. Development standards (e.g., building densities, site disturbance/lot coverage, setbacks, etc.) will be determined by the Specific Plan. Any details or issues not covered by the development guidelines or regulations of this Specific Plan shall be subject to the regulations or standards set forth in applicable sections of the Mono County General Plan, County Code, Grading Ordinances, and other adopted ordinances, codes or policies of the County.

The Mono County General Plan Land Use Element also contains policies specific to the Tri-Valley planning area. The specific plan and use permit findings in the adopting ordinance describe the project's consistency with area policies.

#### **D. Relationship between the Specific Plan and Mitigated Negative Declaration**

This Specific Plan has been prepared for Apogee Farms in compliance with the California Environmental Quality Act (CEQA). When considering a discretionary project which is not exempt from CEQA, such as this Plan, a Lead Agency must prepare an initial study to determine whether the project may have a significant adverse effect on the environment. If such an effect may occur, the Lead Agency must prepare an Environmental Impact Report (EIR). If there are no adverse effects, or if the potentially significant effect(s) can be reduced to a level that is less than significant through project revisions, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) can be adopted (§21080). A MND is a type of Negative Declaration that allows the Lead Agency to revise the project through mitigation measures prior to circulating the environmental document for public review. The statute provides that MNDs may be used, "when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review will avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment will occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment" (§21064.5).

The prerequisites for adopting a MND include:

1. Making a good faith effort to determine whether there is substantial evidence that the project would result in any significant environmental effect.



2. Incorporating effective revisions or mitigation measures into the project to alleviate potential significant effects prior to circulating the draft Negative Declaration for public review.
3. Evidence in the record to support the agency's determination that there will be no significant effect as a result of the project.

California Government Code §65507 authorizes a legislative body to adopt an ordinance or resolution requiring that a Specific Plan be prepared when it is in the public interest to do so. Mono County has applied this authority to Specific Plans for outlying parcels, including the Apogee Farms site. As with General Plans, the Board of Supervisors must hold a public hearing before considering adoption of the Specific Plan.

The Mitigated Negative Declaration (SCH #2021050252) for the Apogee Farms Specific Plan contains a Mitigation, Monitoring, and Reporting Plan (MMRP) (Attachment A) that was adopted to mitigate potentially significant environmental impacts associated with implementation of this Specific Plan to a less than significant level. Mono County is responsible for monitoring and enforcement of the MMRP, unless another responsible agency is identified, to assure that all measures are implemented in a timely and effective manner. The County, or other identified responsible agency, is responsible for enforcement of the regulations contained in this Specific Plan. With the proposed mitigation measures, the MND concludes no potentially significant adverse environmental impacts result from the proposed project.

**E. Summary of Preparation Process & Document Availability**

The project application accepted for processing by the Land Development Technical Advisory Committee (LDTAC) on May 20, 2019, was for a General Plan Amendment land use designation change from Rural Residential to Agriculture, and a Conditional Use Permit for cannabis cultivation and distribution. Following acceptance, the County contracted for environmental services with Panorama Environmental, Inc. During the analysis of the project and evaluation of environmental impacts, a specific plan was deemed a more appropriate governing land use document in order to prevent unnecessary environmental impacts. The Specific Plan and Mitigated Negative Declaration are available for review at the Mono County Community Development office, 1290 Tavern Rd., Mammoth Lakes, CA 93546. It is also available online at <https://www.monocounty.ca.gov/planning/page/apogee-farms-specific-plan-and-mitigated-negative-declaration>. Documents are also available by contacting Michael Draper, Planning Analyst, at 760-924-1805 or [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov). Hard copies are available for the cost of reproduction.

**F. Noticing and Public Comment**

Approval of specific plans and conditional use permits require a public hearing, noticed in conformance with state law. The project was noticed by first class mail to surrounding property owners within 300’ feet prior to the public hearing at the Planning Commission and Board of Supervisors meeting. Any amendments to this plan shall comply with all noticing requirements of the Mono County General Plan.

A General Plan Amendment requires publication once in a newspaper of general circulation, notice to any person who has filed a written request, notice by mail to property owners within 300’ of the projects, and notice to each local agency expected to provide water, sewage, streets, roads, schools or other essential facilities or services (including fire protection) to the project.

Noticing:

|       |                                  |
|-------|----------------------------------|
| AB 52 | June 12, 2020, and March 2, 2022 |
| SB 18 | June 12, 2020, and March 2, 2022 |

|   |                    |
|---|--------------------|
| Notice of Preparation (NOP)   | May 15, 2021       |
| NOP submitted to the CA Office of Planning and Research, State Clearinghouse                                | May 14, 2021       |
| Notice of Intent (NOI) to Adopt IS/MND submitted to CA Office of Planning and Research, State Clearinghouse | July 14, 2022      |
| Mailed NOI notice to surrounding property owners  | July 15, 2022      |
| Newspaper notice published for NOI  | July 16, 2022      |
| Public hearing notice mailed to surrounding property owners   | September 21, 2022 |
| Newspaper notice published for public hearing   | September 22, 2022 |

**G. Issues addressed in the Plan**

The Plan identifies the type of uses that may take place on the property and the development standards that apply. The Plan provides for commercial cannabis cultivation, processing and distribution while reducing impacts to cultural, biological, and hydrological resources of the property and preserving the area’s rural character.

**II. Location, Plan Purpose, Existing Uses**

**A. Project location**

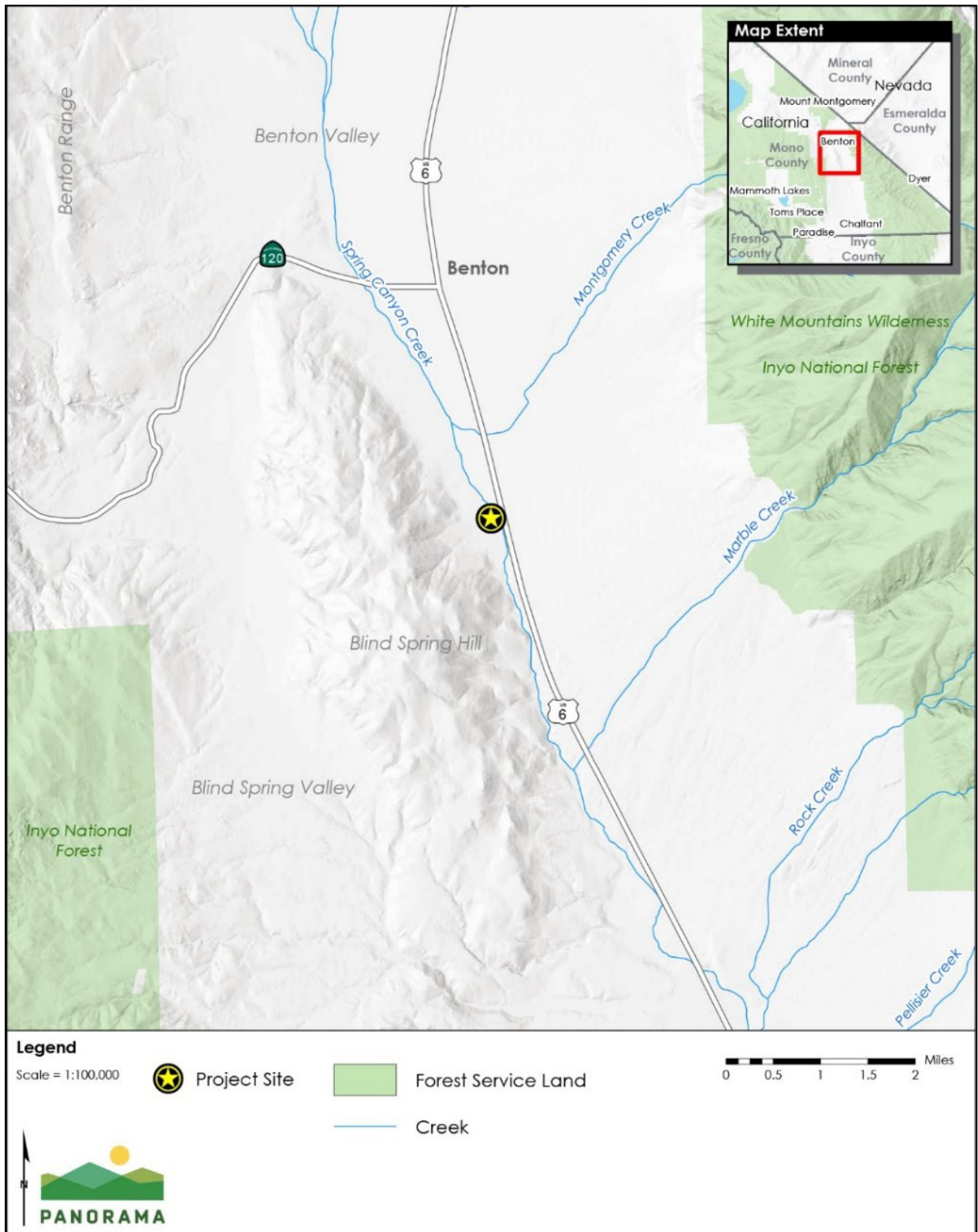
The Apogee Farms Specific Plan site is located in southeastern Mono County, California, as shown in Figure 1 below. The rural community of Benton is 2.5 miles to the north, and the city of Bishop is 32 miles south of the project site. The project site encompasses one 40.4-acre parcel (APN 025-020-013) and one 37.9-acre parcel (APN 025-040-002) west of US 6.

**Assessor’s Parcel Numbers (APNs):** 025-020-013, 025-040-002

**Address:** 23555 US 6, Benton, CA 93512

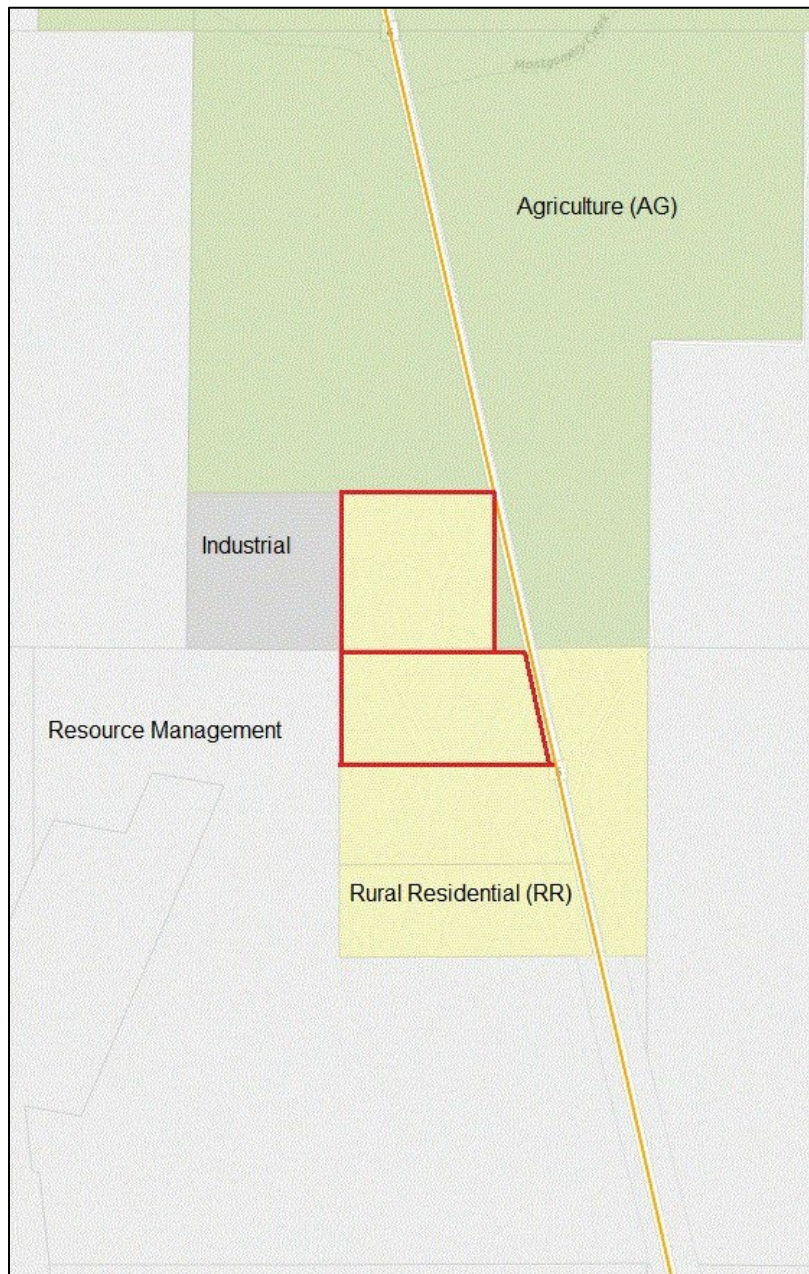
**Latitude, Longitude :** 37.784047, -118.468509

Figure 1. Regional location



Surrounding the project site are a mix of privately and publicly owned parcels with different land uses, see Figure 2 below. One 465.8-acre parcel divided by US 6 lies to the northwest, north, and northeast of the project parcel. The parcel is designated Agriculture (AG), is privately owned, and a portion of the property east of US 6 is used for agricultural production. Another 39.8-acre parcel to the east is designated Rural Residential (RR), privately owned, and undeveloped. South of the project is a 37.9-acre property, designated RR, and developed with a single-family dwelling. The parcel southwest and west of the project is 402.6 acres, owned by the Bureau of Land Management, designated Resource Management (RM), and is undeveloped. The other parcel west of the project site is 40.3 acres, designated Industrial (I), and developed with a residence

Figure 2. Surrounding properties' land use designation. Source: Mono County General Plan Map



## B. Specific Plan Purpose Statement

The primary objectives of the Plan are to:

- 1) Ensure the compatibility of the commercial cannabis operation site with adjacent land use designations; and
- 2) Regulate commercial cannabis cultivation, processing, and distribution of cannabis products in the County in a manner consistent with State and local regulations and allow the orderly development and oversight of the commercial cannabis operation businesses in the County; and
- 3) Protect sensitive resources identified on site and limit groundwater consumption.

The purpose of these regulations is to provide for development of Apogee Farms in a manner that reflects the spirit and intention of the Mono County General Plan and commercial cannabis regulations. A central objective of these regulations is to provide for limited commercial cannabis activities on the property while protecting the resources of the area covered by the Plan.

## C. Existing Land Use Designation and Uses

### Existing Land Use Designation

The existing land use designation is Rural Residential – 40 acres. The Rural Residential designation is intended to permit larger-lot single-family dwelling units with ancillary rural uses in areas away from developed communities. Small-scale agriculture, including limited commercial agricultural activities, is permitted. The property may not be subdivided into less than 40-acre parcels.

### Existing Uses

The project site contains approximately 3,888 linear feet (0.74 miles) of dirt roads. Approximately 2,503 linear feet will be improved from US 6 to the operation. Existing structures are concentrated together in the southwest corner of APN 025-020-013. Existing structures include a shed, equipment pad for a well, equipment pad for a propane tank, a housing trailer, and a storage container (see Figures 3 & 4).

The existing housing trailer and storage container are currently unpermitted, and an illegal use based on the existing land use designation, see Table 1 below. The housing trailer is occupied by the property owner/applicant. The use of the trailer will be permitted as part of this Specific Plan and the storage container is required to comply with standards of General Plan, Chapter 11, Cargo Containers. No complaints have been filed against the property owner for the use.

Table 1. Existing Uses

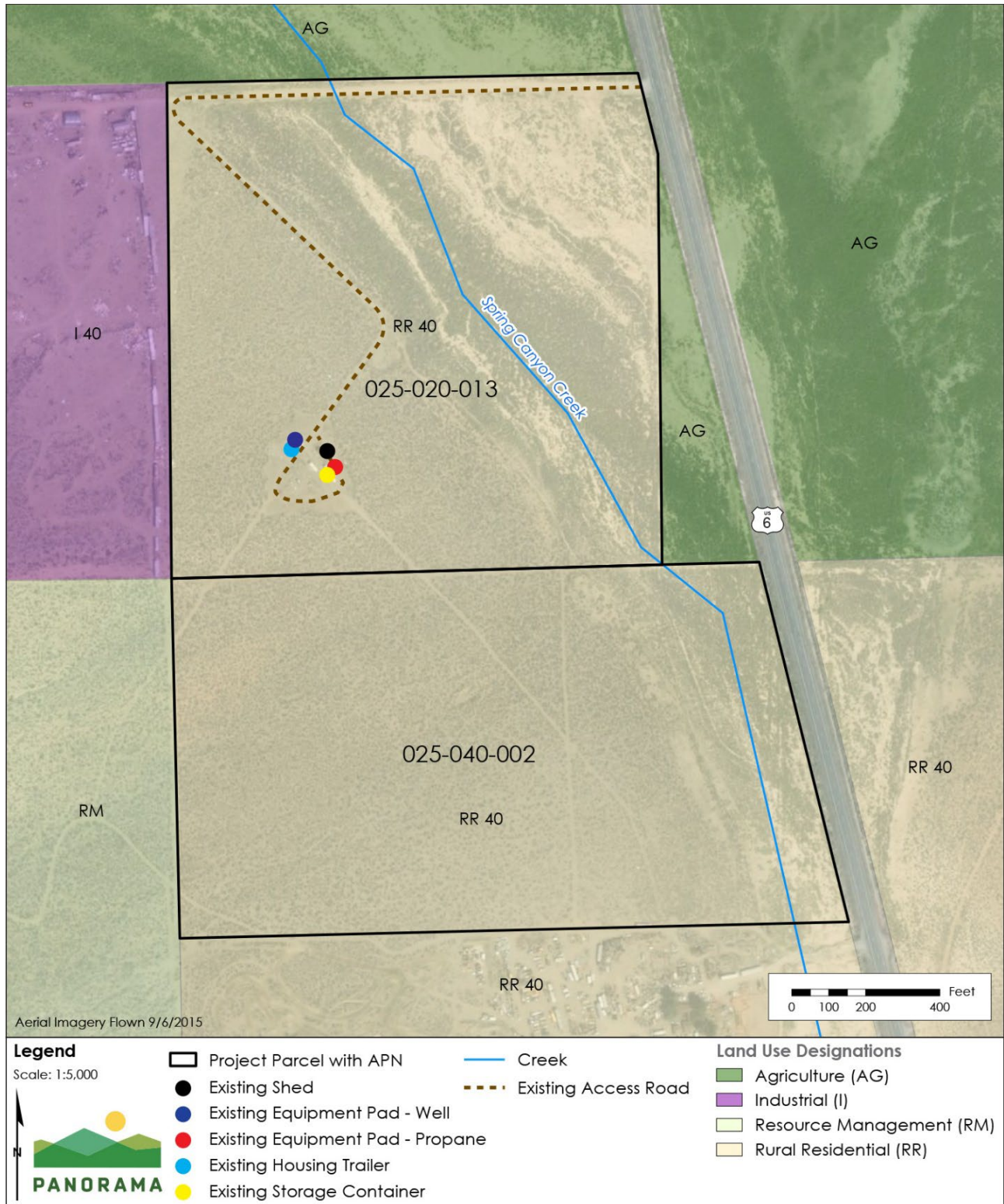
| Facility Components                    | Footprint (square feet)                                   | Dimensions                                |
|--|---|---|
| <b>Existing</b>                        |   |   |
| Dirt Access Roads and Turnaround       | 36,604  | 10 feet x 2,982 feet<br>8 feet x 598 feet |
| Equipment Pads (Well and Propane Tank) | Well: 15.7 <sup>a</sup><br>Propane Tank: 5.7 <sup>a</sup> | --  |
| Shed                                   | 194.6   | --  |

| Facility Components | Footprint (square feet) | Dimensions       |
|---------------------|-------------------------|------------------|
| Storage Container   | 320                     | 8 feet x 40 feet |
| Housing Trailer     | 96                      | 8 feet x 12 feet |

Notes:

<sup>a</sup> Estimated based on site plans.

Figure 3. Existing site conditions.



### Existing Access

The project site is accessible via an unpaved access road that extends from US 6 to the west into the adjacent parcel, then extends south to the location for the proposed facilities in the southwestern corner of the project site, as shown in Figure 3 above. The east-west portion of the access road provides access to the neighboring property to the west. The access is recorded within Parcel Map 35-5 as a 60' wide easement that runs the length the parcel.

## **III. Project Description**

### **A. General Plan Amendment: Modification of Land Use Designation from RR to SP**

The Project will amend the land use designations of two parcels under the same ownership from Rural Residential – 40 to Specific Plan. The modification allows commercial cannabis activities, which are currently prohibited in residential land use designations. Additionally, commercial cannabis cultivation must be at least 300 feet from the property line of any neighboring parcel under a different land use designation (MCGP 13.080.A.2). The applicant will locate the operation in an area on the northern parcel (025-020-013) where there is existing ground disturbance. This area is approximately 165-feet from the southern parcel boundary, therefore the southern parcel under the same ownership is included in the designation change.

### **B. The Specific Plan Project Description and Development Standards**

See Section IV. Land Use Designation Regulatory Provisions.

### **C. Conditional Use Permit: Cannabis Operations**

#### *1. Commercial Cannabis Operations*

The project includes construction and operation of commercial cannabis cultivation, processing, and distribution. The applicant will cultivate cannabis outdoors and indoors and will process the raw material onsite to prepare it for wholesale distribution. Each activity requires approval of a Cannabis Operation Permit by the Board of Supervisors.

The project will be developed in three stages for financial purposes, as described in the section below. Cultivated cannabis will be processed onsite. Processing includes all activities associated with the drying, curing, grading, trimming, rolling, storing, packaging, and labeling of cannabis or nonmanufactured cannabis products.

Once processed, product will be distributed by the applicant. "Distribution" means the procurement, sale, and transport of cannabis and cannabis products between licensees. Wholesale shipments are anticipated to take place monthly.

The applicant/property owner will live on site and be an on-site employee. One to two additional employees will be hired seasonally to assist with harvesting and processing.



## 2. Buildings and Structures

The northern plot is slated for development, as described. No development is proposed on the southern lot. Permitted uses identified in Section IV, below, will be allowed by right, but any other uses will need to be approved through a future Specific Plan Amendment.

Electricity to the project site shall be installed by the owners/applicants to serve the needs of development contained on each property. The applicant has requested overhead power lines be allowed to the cannabis project site and residential component. This is the preferred method for providing electricity to the site due to the existing environmental constraints.

The commercial cannabis facility includes a processing and distribution facility in the southeast portion of the north parcel, as shown in Figure 3, above.

Cultivation initially may be conducted indoors as well as outdoors but will be solely indoors after project buildout (phase 3). Potential cultivation phases are summarized in Table 2. No timeline is proposed for the phasing.

Table 2. Cultivation Phases

| Phase | Number of Greenhouses | Indoor Cultivation Area (total square feet) | Outdoor Cultivation Area (square feet) | Total Cultivation Area (square feet) |
|-------|-----------------------|---|--|--------------------------------------|
| 1     | 1                     | 2,880                                       | 5,760                                  | 8,640                                |
| 2     | 2                     | 5,760                                       | 2,880                                  | 8,640                                |
| 3     | 3                     | 8,640                                       | --                                     | 8,640                                |

The project components and footprint of each component for full project buildout are summarized in Table 3 below. Existing equipment pads and access roads also are identified. The project will include a processing and distribution facility (referred to as the “processing facility”) for commercial cannabis manufacturing, processing, and distribution activities. Three greenhouses will be constructed southeast of the processing facility within the cultivation area either all at once or over the course of three project implementation phases. The greenhouses will be used for indoor cannabis cultivation. Air conditioning units will be used, if necessary, to lower temperatures in the greenhouses. Evaporative cooling walls will be built into the greenhouses to cut down on the amount of time for running individual air conditioning units. The greenhouse locations are shown in Figure 4. The greenhouse facility will be made of steel posts and beams, with clear plastic walls and ceilings. The total area of cultivation, whether all indoors or a mixture of indoors and outdoors, will occupy less than 10,000 square feet, within the fenced 23,400-square-foot cultivation area.

An approximately 320-square-foot storage shed will be constructed northwest of the greenhouses within the cultivation area. The storage shed will be constructed of treated wood or steel with insulation on a concrete foundation. Steel cladding and framing on commercial buildings will be brushed or treated so that the material would not create a new source of glare and of dark, earth tone colored. The storage shed will be used for storage of water tanks, fertilizers, and other materials related to cannabis cultivation.

Table 3. Facility Components

| Facility Components   | Footprint (square feet)                                   | Dimensions  |
|---|---|---|
| <b>Existing</b>   |   |   |
| Dirt Access Roads and Turnaround  | 36,604  | 10 feet x 2,982 feet<br>8 feet x 598 feet   |
| Equipment Pads (Well and Propane Tank)  | Well: 15.7 <sup>a</sup><br>Propane Tank: 5.7 <sup>a</sup> | --  |
| Shed  | 195   | --  |
| Storage Container   | 320   | 8 feet x 40 feet  |
| Trailer   | 96  | 8 feet x 12 feet  |
| <b>Proposed</b>   |   |   |
| Graveling of Existing Access Roads and Turnaround <sup>b</sup>                    | 59,640  | 20 feet x 2,982 feet  |
| Processing Facility   | 1,800   | 30 feet x 60 feet   |
| Greenhouses (Three)   | 8,640   | 30 feet x 96 feet   |
| Storage House (Water Tank Enclosure)  | 320   | 16 feet x 20 feet   |
| Well Pump House   | 32  | 4 feet x 8 feet   |
| Cultivation Area Fencing  | --  | 130 feet x 180 feet; 23,400 linear feet   |
| Parking Space   | 500   | 2 parking spaces: 10 feet x 20 feet<br>1 handicap-accessible space: 15 feet x 20 feet |
| Septic System (1,000-gallon tank) (standard sizing for a three-bedroom residence) | 3,920 <sup>a</sup>  | Leach line <sup>c</sup> : 120 linear feet<br>or two leach lines: 60 linear feet       |

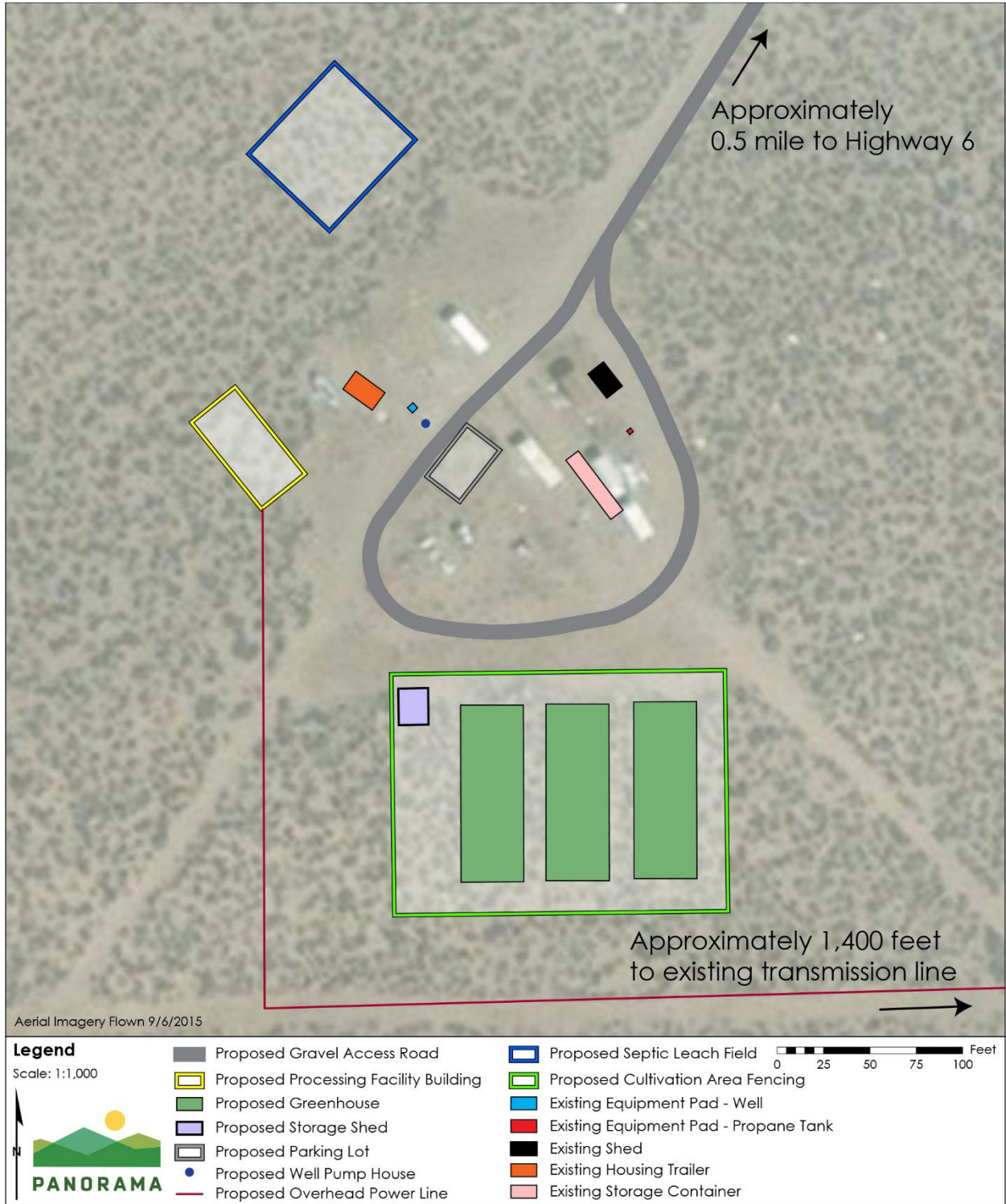
Notes:

<sup>a</sup> Estimated based on site plans.

<sup>b</sup> The access roads and turnaround are existing, but the project will involve upgrades to the access road to meet County fire safety standards including use of aggregate and roadway expansion to provide two 10-foot traffic lanes.

<sup>c</sup> The width of a standard leach line trench ranges from 18 to 36 inches (Mono County Health Department, 2020).

Figure 4. Project Site Plan



### 3. *Roads and Parking*

The commercial and employee access to the project site is provided via an unpaved road, extending from US 6 along the northern boundary of the project parcel. The roadway is fenced and within an easement that supplies access to the parcel to the west. Vehicles will travel to the northwest corner and continue on the existing road through a gate in the fence that leads to the proposed cannabis facility site in the southwest corner. Gate entrances shall comply with MCGP Ch.22.110.K. Gates shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained and operational at all times.

The existing access roads and turnaround will be covered in gravel for internal access to the processing facility and cultivation area. The portion of the access roadway within the US 6 right-of-way will be paved to meet current California Department of Transportation (Caltrans) standards and encroachment permit requirements.

A gravel parking area will be on the east side of the processing facility and north side of the cultivation area. Three parking spaces, including one parking space that meets ADA-accessible standards, will be installed in the parking area, compliant with General Plan Chapter 6, Parking.

All project site access roads will be improved to comply with the regulations set forth in Chapter 22 of the County's General Plan, for fire safety and to provide adequate entry and egress for emergency vehicles. These improvements include constructing the access road to provide a minimum of two 10-foot traffic lanes, not including shoulder and striping. These access road lanes will be improved to provide for two-way traffic flow to support emergency vehicle and civilian egress. The access road will be designed and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds and provide an aggregate base. Turnarounds and turn outs on the driveway and dead-end access road will be provided per the County standard at the time of a building permit.

### 4. *Lighting, Signage, and Fencing*

Project lighting consist of light-emitting diode (LED) greenhouse lighting and small LED lighting installed outside the processing facility and storage shed. Lighting in the greenhouses will be used only to extend the light cycle for vegging<sup>1</sup> cannabis plants when daylight hours are limited and not sufficient for the growing plants. Automatic curtains will be installed inside the greenhouses to prevent light leakage from dusk to dawn. Exterior lighting will consist of four motion sensor LED lights placed at each corner of the garden fence and one exterior light on the outside of drying/processing facility. All exterior lighting will be cast downwards and fully shielded in compliance with the County dark sky ordinance (MCGP Ch. 23). Further, LED light temperatures shall not exceed 3,000 K.

No signage will be installed as part of the project. A six-foot-tall chain link fence, with a lockable gate, will be installed around the cultivation area. The fencing will include a screening material in a dark, earth-toned color to act as a wind break and restrict visibility.

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<sup>1</sup> Vegging is the period when a cannabis plant is between a seedling/clone and flowering.

## 5. *Utilities*

### Water Supply and Use

Water shall be provided onsite with wells. The northern parcel contains a well for water use and two water holding tanks (2,600 gallons each) will be installed inside the storage shed. A pump house will be constructed adjacent to the existing on-site well.

Water for construction and operation will be sourced from the existing on-site well, subject to Environmental Health Department permitting and approval. Water will be used for dust control during construction, as specified by the local air pollution control district. Water will also be used for plant cultivation and domestic uses. Daily water usage is estimated to be 600 gallons per day during operation. The cannabis cultivators will maintain daily water use records for five years and make all records available for the State Water Resources Control Board (SWRCB) and California Department of Fish and Wildlife (CDFW) for review, per the Cannabis Cultivation Policy prepared by SWRCB (2019).

Groundwater use is subject to the jurisdiction of the Tri-Valley Groundwater Management District (TVGMD).

### Energy Supply

Power for the facility will be supplied by overhead power poles from US 6 to the operation's facilities, per MCGP 11 - Utilities. Overhead power lines are the preferred method of transmitting energy to the site due to the existing floodway along the east side of the property. Findings to approve overhead power are contained within Planning Commission Resolution 22-\_\_ and the adopting documents by the Board of Supervisors. Southern California Edison (SCE) will supply electric power to the project site, and a backup propane-powered generator will be used for emergency power.

The propane backup-power generator will be installed west of the processing facility. The generator will be required to comply any requirements of the California Department of Cannabis Control. A permit from the Great Basin Unified Air Pollution Control District (GBUAPCD) will be required if the propane generator exceeds 900 brake horsepower (bhp).

Figure 5. Overhead power line location.



### Waste Disposal

Several distinct types of waste may be produced at the cultivation facility, including green waste, solid waste, liquid waste, and potentially hazardous waste, such as cleaners or fertilizers. Green waste will be composted on the project site not to exceed 100 cubic yards. Other solid waste and hazardous waste will be hauled to Benton Crossing Landfill County landfill or another disposal site.

Benton Crossing Landfill currently serves as the regional landfill for Mono County, and it is the only site in Mono County that accepts municipal solid wastes. Capacity at this landfill is expected to be adequate through 2023, after which the site will be closed. The cannabis facility will not generate a substantial volume of solid waste that could not be accommodated at Benton Crossing Landfill, based on the small volume of waste that will be generated from the cannabis facility. Pumice Valley Landfill will be available for solid waste disposal after the Benton Crossing Landfill ceases operation in 2023. Pumice Valley Landfill has a remaining capacity of 358,790 cubic yards and is expected to be operational until 2048. As indicated in the fee summaries of Benton Crossing Landfill and Pumice Valley Landfill, both landfill sites accept hazardous waste, including paints, pesticides, and cleaning products. All project-related waste will be disposed at permitted solid waste facilities and in accordance with local and State regulations.

### Wastewater and Sewage

The sources of wastewater will include excess irrigation, domestic uses, and a reverse osmosis (RO) filtration reject stream. Wastewater from excess irrigation will be reclaimed by running it through the RO

system and re-using the filtered water for operation. A minimal amount of water will be rejected as part of the RO system. The rejected water and domestic uses wastewater will be discharged to a septic system.

The project facility will be equipped with a 1,000-gallon septic tank and a leach line for effluent and discharge wastewater. The project applicant has contacted the Mono County Department of Environmental Health about septic regulations and will comply with requirements set forth by the County to ensure the approval of a septic permit. The cannabis effluent will also need to comply with the requirements of the SWRCB Cannabis Cultivation General Order.

## *6. Construction*

The proposed sewer and energy supply infrastructure will be constructed on the project site before grading activities. Up to 0.5 acre of the site will be graded. The total disturbance area will be up to 1.33 acres. All excavated and graded material will be balanced on the project site. After completion of grading, the processing facility, storage shed and cultivation area will be constructed. Gravel will be laid on the existing internal access routes and parking area.

Project construction for Phase 1 will occur over approximately 6 to 8 months, starting in 2022 at the earliest, with the longer duration anticipated if all three greenhouses are completed via phased construction. There is currently no timeframe required for completing Phases 2 and 3. A maximum crew size of four workers will be required during construction. A maximum of eight one-way vehicle trips by construction equipment and vehicles will occur daily during construction. Water will be sourced from the on-site well for dust control. The power line, well pump house, and wastewater system will be installed first. The processing facility, cultivation area footprint, and adjacent areas then will be graded to create a flat building surface. Following the grading activity, the processing facility and at least one greenhouse, and the storage shed will be constructed. The greenhouses may be constructed over the course of three project phases, with one greenhouse constructed during each phase. Perimeter fencing will be installed around the footprint of the cultivation area. Imported gravel will be spread on the unpaved roads and turnaround.

## *7. Facility Operation*

Facility operations will include cannabis cultivation, processing, and distribution. No daily use of heavy equipment is anticipated during facility operation.

### Cultivation

Cannabis cultivation will include mother plant cloning and outdoor, indoor cultivation. Mother plants will be kept and cut in the processing facility. The cuttings will be transported to the greenhouses, or outdoor cultivation areas for replanting. Each greenhouse may grow up to 2,200 plants, and up to 15,000 plants could be on site, including clones and mother plants when all three greenhouses are in full operation.

### Manufacturing and Distribution

The mature plants then will be taken to the processing facility for processing. The processing facility will house all drying, curing, grading, trimming, rolling, storing, packaging and labeling activities. Water tanks, fertilizers, and equipment needed for cultivation will be stored in the storage shed house in the northwest corner of the cultivation area.

### Odor Management

Greenhouses will be equipped with a ventilation system to control odors, humidity, and mold in accordance with Mono County Code. Each greenhouse will contain two exhaust vents for a total of six exhaust vents with three greenhouses. Each exhaust vent will contain a Cannabuster™, iodine mister, or similar system. The mister will only be used during times of flowering and harvesting, if necessary.

Odor generated by the temporary outdoor cultivation sites will rely on distances from, and the small numbers of, sensitive receptors to prevent significant odor impacts. The project vicinity is sparsely populated; the nearest sensitive receptor is an off-site residence located 1,500 feet from the project site. An estimated four residences are located within one mile of the facility and 39 residences are located within two miles of the facility. The residences within two miles of the facility will be expected to house 113 individuals assuming an average household size of 2.91 individuals consistent with the demographics of the census tract. The individuals within two miles of the project site represent approximately three percent of the census tract and 0.79 percent of the County population, which represents a very low number of people that may be potentially affected by odor from the project.

### Personnel

One person who currently lives on the project site in a portable trailer will live on site and be an on-site employee at the cannabis facility. The applicant has stated that one to two additional employees will be hired seasonally during harvests.

### Traffic Generation

Employees will generate an average of four one-way trips a day, Monday through Friday. Cannabis wholesale distribution during harvest will necessitate up to three roundtrips per month.

## **D. Planning Area Information and Environmental Description**

The environmental setting is comprehensively covered in more detail in the Mitigated Negative Declaration.

### *1. Fault Lines*

There are no fault lines on the project site. The nearest fault line is within the Blind Spring Hills directly west and approximately one mile away. The fault is categorized by the California Department of Conservation as a Pre-Quaternary Fault, meaning it occurred before 1.6 million years ago. The project and future development will not take place within a fault line hazard area.

### *2. Floodplain*

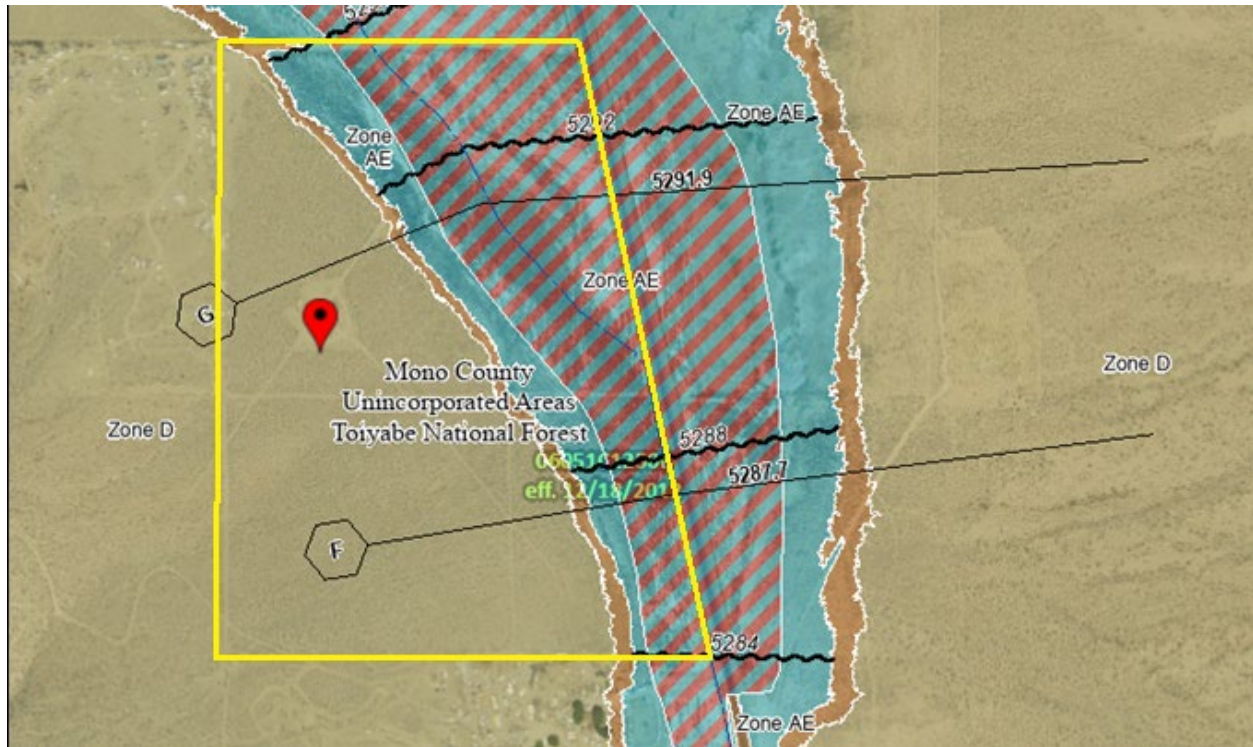
Federal Emergency Management Agency's (FEMA) flood maps, known as Flood Insurance Rate Maps (FIRMs), identify areas of flood hazard, which are labeled on the flood map as zones starting with the letters A and V for high-hazard areas known as Special Flood Hazard Areas or SFHAs. Areas with a potentially moderate-to-high risk of flooding, but the probability has not been determined, are labeled Zone D on the flood maps.

A portion of the properties are within the FEMA category Special Flood Hazard Area "Zone AE" (see Figure 6 below). The remaining portion of the property is categorized as Zone D. To avoid flood risk, development



of the parcels will occur outside the Special Flood Hazard Areas, entirely within Zone D. In Zone D there are no mandatory flood insurance requirements or minimum building requirements by FEMA. However, Zone D indicates that there is a risk of flooding, the level of risk is just unknown. All future construction shall be reviewed by Mono County at the building permit stage for compliance with FEMA floodplain requirements.

Figure 6. FEMA Flood Plain map. Source: <https://msc.fema.gov/portal/home>



### 3. *Vegetation Characteristics and Habitat*

Existing vegetation is dominated by the mixed desert scrub type, transitioning between the saltbush scrub of the valley floor and the more mesic big sagebrush sites of the upper alluvial fans.

A reconnaissance-level survey of the 80-acre project site was conducted in November 2019 by biologist Russell Kokx. The reconnaissance survey documented the environmental settings, including vegetative communities, soils, elevations, habitats, and conditions. This survey was conducted to evaluate the potential for special-status species to occur. Biological database searches, including U.S. Fish and Wildlife Service (USFWS), California Natural Diversity Database (CNDDB), California Native Plant Society, and National Wetland Inventory, for the project vicinity were conducted in May 2019.

Mr. Kokx conducted focused botanical surveys of the project site on May 28 and June 17, 2020. Surveys were conducted during optimal conditions to determine whether special status plant species or their habitats were present in the project site.

The on-site vegetation communities indicate that no wetland vegetation is present in the project site. No wetlands were observed on site during the reconnaissance-level survey conducted for the project. Therefore, no wetlands are on the project site. Per the National Wetland inventory, the project site

contains 0.94 linear miles of Riverine habitat (0.4 miles of Spring Canyon Creek, 0.42 miles of Montgomery Creek, and 0.12 miles of an unnamed stream). The riverine habitat is ephemeral.

A special-status plant survey was conducted a part of the CEQA Initial Study to evaluate whether the project will impact any populations of special-status plants. The results revealed that no special-status plant species or wetlands are present within the Apogee Farms building area. The Apogee Farms Project and General Plan Amendment will have no impact on special-status plant species or wetlands. No additional mitigation is recommended to address rare or special-status species (see Appendix C of the CEQA IS/MND, "Rare Plant Survey Report").

#### **4. Cultural Resources**

A cultural resources study of the property was completed by a qualified archeologist and a part of the Initial Study. 13 cultural resources were identified within a one mile radius of the project's parcel boundaries. Considering the kinds and frequency of cultural resources surrounding the parcels, however, it is likely that one or more small prehistoric sites (small camps or stone working areas) and/or historic refuse deposits (related to mining or transportation work) exist within the Apogee Farms acreage. Additional research identified four other cultural resources studies within one mile of the site.

Eleven of the cultural resources are archaeological sites, nine of which are in the project site. The other two resources are isolated artifacts. Nine of the identified cultural resources are within the two project parcels, but none of the resources are in the cannabis facility site.

Mitigation Measure CUL-1 requires a qualified archaeologist approved by the County to be on-site to monitor all ground disturbing construction activities within 50 feet of any known cultural resource. If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt, the County shall be notified, and the discovery shall be evaluated in accordance with the requirements of Mitigation Measure CUL-2, Inadvertent Discovery of Archaeological Resources, see Section 3.6 of the Initial Study/Mitigated Negative Declaration.

## **IV. Land Use Designation Regulatory Provisions**

Terms used in this Specific Plan shall have the same definition as given in the Mono County General Plan, unless specified otherwise herein. If any portion of these regulations is declared by judicial review to be invalid in whole or in part, such decision shall not affect the validity of the remaining portions.

### **A. Intent**

The "SP" designation is intended to provide for planned development in areas outside existing communities, or on large parcels of land within or adjacent to existing communities. The Specific Plan designation may also be applied to an area to provide direction for potentially conflicting or incompatible land uses. The designation may also be used to "plan for future land uses in the vicinity of, and access routes serving" surface mining operations (Public Resource Code § 2764).

## **B. Permitted Land Uses**

Permitted uses will be determined by the Specific Plan in accordance with Government Code §65451, applicable provisions of the Mono County General Plan, the Land Development Regulations, and the Mono County Code.

## **C. Permitted uses include:**

- Single-family dwelling
- Accessory buildings and uses (incidental to any of the permitted uses, permitted only when located on same lot and constructed simultaneously with or subsequent to the main building).
- Animals and pets consistent with RR allowances (see Animal Standards Section 04.270).
- Manufactured home used as single-family dwelling provided that the unit is fewer than 10 years old and meets the criteria set forth in Section 04.280. When there are two mobile homes on the same parcel, they must 1) comply with the Accessory Dwelling Unit requirements (see Ch. 16), or 2) comply with State standards for a mobile-home park and obtain a use permit from the County (see Ch. 17, Mobile Homes and RV Parks)
- Accessory Dwelling Unit (as prescribed in Chapter 16, Development Standards – Accessory Dwelling Unit)
- Farm labor housing for workers employed at the project site
- Home occupations (as prescribed in Section 04.290)
- Non-commercial composting facilities where the operation does not create a nuisance problem and has less than 100 cubic yards of material on site at any given time.

### Uses subject to a Director Review Permit.

- Minor alterations involving no expansion of square footage or intensification of uses and exempt from CEQA.

### Uses permitted subject to a Specific Plan Amendment and Use Permit Equivalent include:

- Any uses other than a permitted use require an amendment to this Specific Plan.
- Commercial cannabis activities.

## **D. Development standards**

Development standards (e.g., building densities, site disturbance/lot coverage, setbacks, etc.) will be determined by the Specific Plan in accordance with Government Code §65451, applicable provisions of the Mono County General Plan, the Land Development Regulations, and the Mono County Code.

- Minimum parcel size of 40 acres.
- Minimum district area of 40 acres.
- Minimum lot dimensions of 60' width and 100' depth.
- Maximum lot coverage of 40%
- Minimum setbacks: Front – 50'; Rear – 50'; Side – 50'
- Setbacks for accessory buildings used as barns or stables: Front 50'; Rear – 30'; Side – 30'
- Population Density is a maximum of 5.02 persons per five acres, or approximately one person per acre provided that no more than one primary dwelling, one accessory dwelling unit, and one junior accessory dwelling unit (as allowed by state law) shall be permitted per parcel.
- Maximum building height of 35'.

**E. Projects exempt from additional environmental documentation.**

Permitted uses listed within the Plan shall be allowed without additional environmental documentation and approved by the Community Development Director if no change in density and no change in conditions are necessary. Minor alternations to the Plan involving no expansion of square footage or intensification of uses are subject to a Director Review Permit.

Any uses not listed are not permissible unless a Specific Plan Amendment is approved with the appropriate accompanying environmental documentation.

**F. Regulations and Ordinances implementing the Plan.**

Approval of the General Plan Amendment and Specific Plan requires a public hearing and recommendation from the Mono County Planning Commission, followed by approval by the Board of Supervisors at a public hearing.

Implementing permitted uses as described by the Plan require nondiscretionary building permits, as applicable.

Any details or issues not covered by the development guidelines or regulations of this Specific Plan shall be subject to the regulations or standards set forth in applicable sections of the Mono County General Plan, County Code, Grading Ordinances, and other adopted ordinances, codes or policies of the County. Construction shall comply with all applicable provisions of the California Building Code and the mechanical, electrical, plumbing and other codes related thereto as administered by Mono County and other agencies with jurisdiction over the project.

**G. Financing measures necessary for implementation**

Financing the Project is the responsibility of the owners/applicants.

**V. Specific Plan Policies and Implementation Measures**

**A. Land Use**

**Goal 1. Provide for development and commercial cannabis activities consistent with the intent of the General Plan that minimizes environmental and community impacts.**

Implementation measure 1.a. The regulations require site design and site planning standards consistent with Mono County policies governing development, the protection of natural resources, and community character in the Benton area.

Implementation measure 1.b. The development standards herein shall regulate all development at Apogee Farms. In case of a conflict between this Specific Plan and the Mono County General Plan, the General Plan shall prevail.

Implementation measure 1.c. Any details or issues not covered by the development guidelines or regulations of this Specific Plan shall be subject to the regulations or standards set forth in applicable sections of the Mono County General Plan, County Code, Grading Ordinances, and other adopted ordinances, codes or policies of the County.

Implementation measure 1.d. Project implementation shall substantially comply with the approved site plan and specific plan standards. No alternative development standards shall be permitted unless such standards are approved via mechanisms described in this Plan.

Implementation measure 1.e. Project shall comply with standards and requirements of General Plan Chapter 13 – Commercial Cannabis Activities, and Mono County Code Chapter 5.60.

**Goal 2. Provide for residential development with ancillary uses.**

Implementation measure 2.a. A residential unit, accessory dwelling units, and associated ancillary uses, sited outside of cultural and biologically sensitive area, are permitted outright subject to only a building permit.

**B. Odor**

**Goal 3. Prevent significant odor impacts to a substantial number of people in the Tri-Valley planning area.**

Implementation measure 3.a. The applicant shall post signs on the road at the property line that provide a project contact phone number in the case of nuisance odors. The applicant shall report any complaints of nuisance odors to the County within 72 hours of the complaint. If complaints are received by the County or applicant about the outdoor grow, the odor impact shall be evaluated and more outdoor cultivation may be required to transfer indoors in the next growing season.

Implementation measure 3.b. If complaints are received about the indoor grow, the odor impact and the effectiveness of the odor filtration system shall be evaluated. The odor filtration system may be required to be modified or replaced to reduce odor.

**C. Aesthetics**

**Goal 4. Maintain the agricultural, rural, and open space aesthetic character of the Tri-Valley.**

Implementation measure 4.a. Outdoor lighting shall comply with General Plan Land Use Element Chapter 23 and, in addition, be fully shielded and downward directed, with LED lighting temperature not to exceed 3000K.

Implementation measure 4.b. Exterior colors shall be dark earth-tone colors with non-reflective surfaces.

**D. Safety**

**Goal 5. Provide for general safety and reduction of hazardous conditions.**

Implementation measure 5.a. Construction is subject to a Mono County building permit.

Implementation measure 5.b. The project is subject to state fire safety standards and General Plan Land Use Element Chapter 22 at the time of building permit application submittal.

Implementation measure 5.c. Any structure in the floodplain shall comply with applicable State, Federal, and Mono County requirements.

## **E. Biological and Cultural Resources**

### **Goal 6. Protect the biological and cultural resources of the Tri-Valley.**

Implementation measure 6.a. Comply with the mitigation measures identified in the Mitigated Negative Declaration for the project.

Implementation Measure 6.b. Pesticide use shall comply with state and local regulations and a 15-day notice of pesticide use shall be provided to beekeepers to the north of the project.

## **F. Minor Modifications**

### **Goal 7. Provide reasonable flexibility for unforeseen circumstances that may improve the safety or operations of the project or reduce impacts.**

Implementation measure 7.a. A minor modification not involving expansion of square footage or intensification of uses subject to Use Permit may be approved via a Director Review permit provided the standards and findings can be made and the project is exempt from the California Environmental Quality Act. All other modifications shall require an amendment to this Specific Plan.

## **G. Compliance with Requirements of Other County Departments**

### **Goal 8. Provide consistency with the rules and regulations of Mono County departments.**

Implementation measure 8.a. Project shall comply with applicable requirements by other Mono County departments and divisions including, but not limited to, Public Works, Tax Collector, Sheriff's office, Building Division, and Environmental Health.

## **H. Revocation and Termination**

### **Goal 9. Ensure compliance with the requirements of this Specific Plan and Use Permit.**

Implementation measure 9.a. Revocation: The Planning Commission may revoke the rights granted by a use permit or Specific Plan, and the property affected thereby shall be subject to all of the provisions and regulations of the Land Use Designations and Land Development Regulations applicable as of the effective date of revocation. Such revocation shall include the failure to comply with any condition contained in the Specific Plan or the violation by the owner or tenant of any provision pertaining to the premises for which such uses were granted. Before the Commission shall consider revocation of any permit, the Commission shall hold a public hearing thereon after giving written notice thereof to the permittee at least 10 days in advance of such hearing. The decision of the Commission may be appealed to the Board of Supervisors in accordance with Chapter 47, Appeals, and shall be accompanied by an appropriate filing fee.

Implementation measure 9.b. Termination: The Specific Plan shall terminate and all rights granted therein shall lapse, and the property affected thereby shall be subject to all the provisions and regulations applicable to the land use designation in which such property is classified at the time of such abandonment, when any of the following occur:

- There is a failure to commence the exercise of such rights, as determined by the Director, within two years from the date of approval thereof or as specified in the conditions. If applicable, time shall be tolled during litigation. Exercise of rights shall mean substantial construction or physical alteration of property in reliance with the terms of the use permit;
- There is discontinuance for a continuous period of one year, as determined by the Director, of the exercise of the rights granted; and
- No extension is granted as provided in Section 32.070.

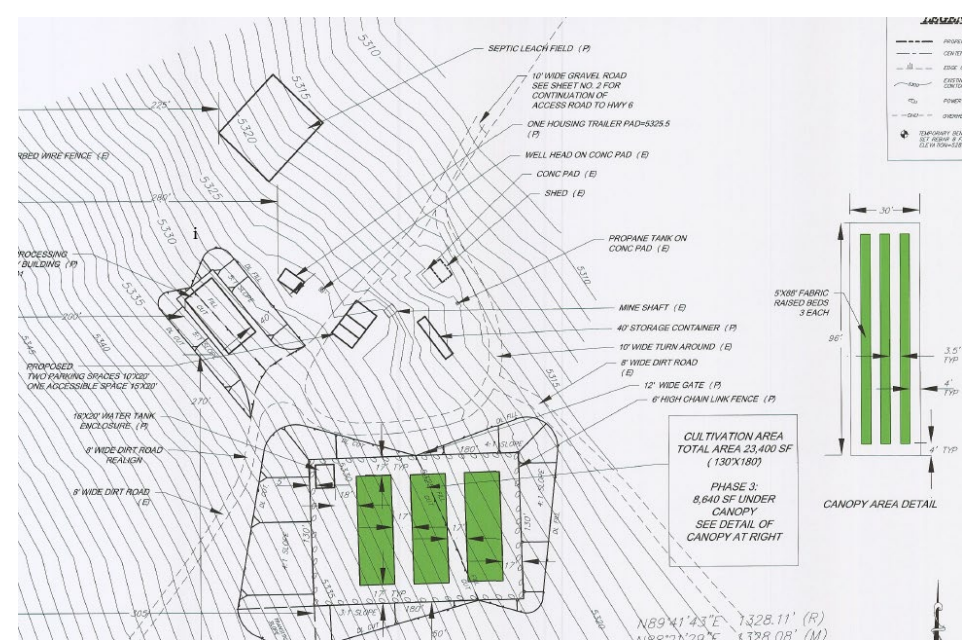
## **Conditions of Approval For the Use Permit Equivalent for Cannabis Activities**

1. Pesticide use shall comply with state and local regulations and a 15-day notice of pesticide use shall be provided to beekeepers to the north of the project.
- 1.2. Existing unpermitted uses on the project shall be permitted in compliance with the Mono County General Plan and Mono County Code.
- 2.3. Approval of the project is conditioned on final approval by the Board of Supervisors at a future meeting. No entitlements of this permit shall be valid until a determination is made by the Board of Supervisors.
- 3.4. All development shall meet requirements of the Mono County General Plan, Mono County Code, and project conditions.
- 4.5. Project shall comply with Chapter 13, Cannabis Regulations.
- 5.6. The project is required to obtain a Mono County Cannabis Operations Permit pursuant to Mono County Code 5.60 and appropriate state licensing prior to commencing operation. A copy of state licenses shall be provided to the Mono County Community Development Department.
- 6.7. The project shall be in substantial compliance with the project description and the site plan of the staff report and Mitigated Negative Declaration.
- 7.8. Applicant must maintain active business license and tax certificate requirements.
- 8.9. In the event of discovery or recognition of any human remains, all work shall be stopped, Mono County Community Development Department shall be notified immediately, and there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county has examined the site (California Health and Safety Code § 7050.5).
- 9.10. Project shall comply with all Mono County Building Division, Public Works, and Environmental Health requirements.
- 10.11. Termination: Commercial cannabis activity authorization shall terminate and all rights granted therein shall lapse, and the property affected thereby shall be subject to all the provisions and regulations applicable to the Apogee Farm Specific Plan when any of the following occur:
  - A. There is a failure to commence the exercise of such rights, as determined by the Director, within two years from the date of approval thereof or as specified in the conditions. If applicable, time shall be tolled during litigation. Exercise of rights shall mean substantial construction or physical alteration of property in reliance with the terms of the use permit;
  - B. There is discontinuance for a continuous period of one year, as determined by the Director, of the exercise of the rights granted; and
  - C. No extension is granted as provided below.



~~11.12.~~ 12.12. Extensions. If there is a failure to exercise the commercial cannabis activity rights of the permit within two years (or as specified in the conditions) of the date of approval, the applicant may apply for an extension for an additional one year. Only one extension may be granted. Any request for extension shall be filed at least 60 days prior to the date of expiration and shall be accompanied by the appropriate fee. Upon receipt of the request for extension, the Planning Division shall review the application to determine the extent of review necessary and schedule it for public hearing. Conditions of approval may be modified or expanded, including revision of the proposal, if deemed necessary. The Planning Division may also recommend that the Commission deny the request for extension.

~~12.13.~~ 12.13. Revocation. The Commission may revoke the commercial cannabis activity rights granted and the property affected thereby shall be subject to all of the provisions and regulations of the Apogee Farm Specific Plan and Land Development Regulations applicable as of the effective date of revocation. Such revocation shall include the failure to comply with any condition contained in the permit or the violation by the owner or tenant of any provision pertaining to the premises for which such permit was granted. Before the Commission shall consider revocation of any permit, the Commission shall hold a public hearing thereon after giving written notice thereof to the permittee at least 10 days in advance of such hearing. The decision of the Commission may be appealed to the Board of Supervisors in accordance with Chapter 47, Appeals, and shall be accompanied by an appropriate filing fee.



# Mono County Apogee Farms General Plan Amendment, Specific Plan, Cannabis Operation Permit, and Conditional Use Permit Project

## Initial Study/Mitigated Negative Declaration

July 2022

717 Market Street, Suite 650  
 San Francisco, CA 94103  
 650-373-1200  
[www.panoramaenv.com](http://www.panoramaenv.com)



Mono County

**Apogee Farms General Plan Amendment, Specific  
Plan, Cannabis Operation Permit, and  
Conditional Use Permit Project  
Initial Study/Mitigated Negative Declaration**

**July 2022**

**Lead Agency:**

Mono County Community Development Department  
Planning Division  
P.O. Box 347  
Mammoth Lakes, CA 93546

**Prepared by:**

Panorama Environmental, Inc.  
717 Market Street, Suite 400  
San Francisco, CA 94103

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### Acronyms and Abbreviations

|                    |  |
|--------------------|--|
| 2015 General Plan  | Mono County 2015 General Plan  |
| ADU                | Accessory Dwelling Unit  |
| APN                | Assessor’s Parcel Number   |
| Apogee Farms       | Apogee Farms, Inc.   |
| BMP                | best management practice   |
| C&C                | Carson & Colorado Railroad   |
| CAL FIRE           | California Department of Forestry and Fire Protection  |
| Caltrans           | California Department of Transportation  |
| CCGO               | Cannabis Cultivation General Order   |
| CCR                | California Code of Regulations   |
| CDFA               | California Department of Food and Agriculture  |
| CDFW               | California Department of Fish and Wildlife   |
| CEQA               | California Environmental Quality Act   |
| CNDDB              | California Natural Diversity Database  |
| Construction Guide | Mono County Health Department Construction Guide for Residential and Commercial On-Site Sewage Treatment and Disposal System |
| COP                | Cannabis Operation Permit  |
| County             | Mono County  |
| CUP                | Conditional Use Permit   |
| EIC                | Eastern Information Center at the University of California, Riverside  |
| EIR                | Environmental Impact Report  |
| EOP                | Emergency Operations Plan  |
| GBUAPCD            | Great Basin Unified Air Pollution Control District   |
| GBVAB              | Great Basin Valley Air Basin   |
| GHG                | greenhouse gas   |

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|                     |   |
|---------------------|---|
| GSP                 | Groundwater Sustainability Plan   |
| Highway 6           | U.S. Route 6  |
| IS                  | Initial Study   |
| LADWP               | Los Angeles Department of Water and Power   |
| Lead Agency         | Mono County   |
| LED                 | light-emitting diode  |
| MBTA                | Migratory Bird Treaty Act   |
| MRA                 | mineral resource area   |
| NPDES               | National Pollutant Discharge Elimination Service  |
| OSHA                | Occupational Health and Safety Administration   |
| OVGA                | Owens Valley Groundwater Authority  |
| PM <sub>10</sub>    | coarse particulate matter   |
| processing facility | processing and distribution building  |
| project             | Apogee Farms Specific Plan, Cannabis Operation Permit, and Conditional Use Permit Project |
| RO                  | reverse osmosis   |
| RR-40               | Rural Residential-40 acres  |
| SCE                 | Southern California Edison  |
| SIP                 | State Implementation Plan   |
| SMARA               | Surface Mining and Reclamation Act  |
| SP                  | Southern Pacific Railroad   |
| SWPPP               | Storm Water Pollution Prevention Plan   |
| SWQCB               | State Water Resources Control Board   |
| USFWS               | U.S. Fish and Wildlife Service  |
| WMFPD               | White Mountain Fire Protection District   |



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## Mitigated Negative Declaration

### Project Information

1. Project Title: Apogee Farms Specific Plan, Cannabis Operations Permit, and Conditional Use Permit
2. Lead Agency Name and Address: Mono County Community Development and Planning  
P.O. Box 347  
Mammoth Lakes, CA 93546
3. Contact Person and Phone Number: Michael Draper, Planning Analyst II  
760-924-1805  
Email Address: [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)  
Public Comment email address: [cddcomments@mono.ca.gov](mailto:cddcomments@mono.ca.gov)
4. Project Location and Setting: 23555 Highway 6, Benton, CA  
APNs: 025-020-013, 025-040-002
5. Applicant's Name and Address: Apogee Farms, Inc.  
P.O. Box 902  
Benton, CA 93512
6. Existing General Plan Designation: Rural Residential
7. Zoning: Rural Residential
8. Description of the Project: The project includes construction and operation of a commercial cannabis production and processing facility with the owner/operator living on site. A General Plan Amendment is proposed to change the land use designation from Rural Residential to Specific Plan. A Conditional Use Permit is required to conduct commercial cannabis cultivation, processing, and distribution. The Specific Plan for the project site would incorporate the Conditional Use Permit, and establish permitted land uses and required development standards.
9. Surrounding Land Uses and Setting: The surrounding parcels are designated Agriculture, Industrial, Resource Management, and Rural Residential.
10. Other Public Agencies: Department of Cannabis Control Cultivation Licensing, California Department of Fish and Wildlife, State Water Resources Control Board, Lahontan Regional Water Quality Control Board, Caltrans,

## MITIGATED NEGATIVE DECLARATION

Mono County Public Works, Mono County Department of  
Environmental Health

## MITIGATED NEGATIVE DECLARATION

### Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the Project, but impacts would be mitigated to a less-than-significant level as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agricultural and Forestry Resources | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources      | <input checked="" type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Energy Use                                    |
| <input type="checkbox"/> Geology and Soils                    | <input type="checkbox"/> Greenhouse Gas Emissions            | <input type="checkbox"/> Hazards and Hazardous Materials               |
| <input type="checkbox"/> Hydrology and Water Quality          | <input type="checkbox"/> Land Use and Planning               | <input type="checkbox"/> Mineral Resources                             |
| <input type="checkbox"/> Noise                                | <input type="checkbox"/> Population and Housing              | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                           | <input type="checkbox"/> Transportation                      | <input type="checkbox"/> Utilities and Service Systems                 |
| <input checked="" type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### Mitigation Measures

#### Mitigation Measure DARK-1: Dark Sky Compliance

The Mono County Outdoor Lighting Ordinance (also known as the ‘Dark Sky Regulations’) was adopted to protect night sky views, enhance travel safety, conserve energy and limit light trespass and glare by restricting unnecessary upward projection of exterior lighting. The regulations prohibit nonconforming light of all types, including signage, fixtures, outdoor sports, recreation, and entertainment. The County pairs the Dark Sky regulations with information and guidelines, including educational materials distributed to provide applicants with design recommendations and suggestions for minimizing intrusive light sources (General Plan Land Use Element Ch. 23).

Exterior lighting on the project site shall be subject to requirements of the Mono County General Plan, Chapter 23 Dark Sky Regulations. The Dark Sky Regulations are comprehensive, adaptive, and designed to meet six specific objectives that include:

- To promote a safe and pleasant nighttime environment;
- To protect and improve safe travel;
- To prevent nuisances caused by unnecessary light;
- To protect night sky views;
- To phase out existing nonconforming fixtures; and

## MITIGATED NEGATIVE DECLARATION

- To promote lighting practices and systems to conserve energy

Only full cutoff luminaires with light source downcast and fully shielded, with no light emitted above the horizontal plane are permitted. Kelvin color temperature should be approximately 2,300 K, and temperatures over 3,000 K are prohibited. Exterior lighting shall be limited to that required for security and safety.

### **Mitigation Measure AQ-1: Odor Control Measures**

- The project applicant shall install an odor control system for indoor cultivation. The indoor odor control system must meet or exceed an odor removal efficiency of 91 to 96 percent, consistent with the proposed Cannabuster™ odor elimination system (Pinchin, 2020) . The odor control system shall be properly maintained and implemented throughout the life of the project to control odors from facility processes that produce nuisance odors at the nearest residential property.
- The applicant shall post signs at the property line of the access road that provide a 24-hour project contact phone number in the case of nuisance odors.
- The applicant shall report any complaints of nuisance odors to the County within 72 hours of the complaint.
- The County may request modifications to the odor control system during project operation should nuisance odors persist at the property boundary after application of the odor control system.
- If odor from outdoor cultivation is determined to be a nuisance, the County may require cultivation to be moved to the indoor greenhouses by the next cultivation cycle.

### **Mitigation Measure BIO-1: Nesting Bird Surveys**

A preconstruction survey shall be performed prior to construction. The following measures shall be implemented:

- Use of heavy equipment, grading, demolition, construction, and/or tree removal, shall avoid the nesting season to the greatest extent feasible.
- If use of heavy equipment, grading, demolition, construction, and/or tree removal are scheduled to occur during the nonbreeding season (September 1 through February 15), no measures are required.
- If construction activities occur during the nesting season, a pre-construction survey for active bird nests in the project site shall be conducted on the project site and within 500 feet of the project site by a qualified biologist approved by the County.
  - If no nesting or breeding behavior is observed, construction may proceed.

## MITIGATED NEGATIVE DECLARATION

- If an active nest is detected, ~~a determination shall be made by a qualified biologist as to whether construction work could affect the active nest. If it is determined that construction would not affect an active nest, work may proceed. If it is determined that construction activities are likely to impair the successful rearing of the young,~~ a 'no-disturbance buffer' in the form of orange mesh Environmentally Sensitive Area (ESA) fencing shall be established around occupied nests to prevent destruction of the nest and to prevent disruption of breeding or rearing behavior. The extent of the 'no-disturbance buffer' shall be no less than 300 feet (500 feet for raptors); a smaller buffer may be determined by a qualified biologist ~~in consultation with CDFW~~. 'No-disturbance buffers' shall be maintained until the end of the breeding season or until a qualified wildlife biologist has determined that the nestlings have fledged. A qualified wildlife biologist shall inspect the active nest to determine whether construction activities are disturbing to the nesting birds or nestlings. If the qualified wildlife biologist determines that construction activities pose a disturbance to nesting, construction work shall be stopped in the area of the nest, and the 'no-disturbance buffer' expanded.

### Mitigation Measure ~~BIO-32~~: Prohibited Development in Sensitive Habitats

Future development under the Specific Plan would be prohibited within any streams, riparian habitats, or sensitive natural communities. No future development would occur in the floodplain to protect sensitive natural communities and special-status species.

### Mitigation Measure ~~BIO-23~~: Mitigation for Riparian Habitat and/or Fish and Game Code Section 1602 Resources.

If construction activities impact riparian habitat and/or Fish and Game Code Section 1602 resources, the permanent loss of riparian habitat and/or Fish and Game Code Section 1602 resources shall be compensated through either on-site restoration; purchase of mitigation bank credits from a CDFW approved mitigation bank; and/or land acquisition, management and conservation in perpetuity and funding thereof. ~~enhancement or establishment of riparian habitat~~. Permanent impacts to riparian habitat shall be compensated at a ratio commensurate with the quality of habitat impacted and habitat created and the type of mitigation provided. ~~through enhancement of riparian areas at a minimum 2:1 ratio (enhancement:impact) or creation of riparian areas at a minimum 1:1 ratio.~~ All areas of temporary impact will be restored to preconstruction contours and habitat conditions. The applicant will work with a biologist or ecologist approved by the County to prepare a habitat mitigation plan that includes:

- Baseline conditions within the mitigation site

## MITIGATED NEGATIVE DECLARATION

- Proposed mitigation site conditions
- Mitigation methods (e.g., habitat creation or enhancement)
- Performance standards/success criteria including a minimum of 70% vegetated cover with native riparian vegetation that are the target of the creation and enhancement efforts and less than 3% invasive species cover
- Habitat maintenance including trash removal, invasive weed removal, and repair of any damage to the mitigation site
- Monitoring requirements including annual monitoring during the establishment period. The annual monitoring will include surveys for native vegetation cover, photo documentation at defined photo-monitoring locations, and monitoring for invasive species and any other habitat stressors. Monitoring will be conducted for the first five years or until success criteria are met.

### **Mitigation Measure CUL-1: Cultural Resources Preservation and Treatment**

Exclusion fencing shall be established and maintained around any known eligible and potentially eligible cultural resources including a 100-foot buffer from the outer limits of any known surface deposits. The fencing shall be comprised of dark, non-reflective material intended for permanent use such as galvanized hog wire and shall be a minimum of 4 feet tall to ensure visibility and minimize unauthorized access. Signs stating “Environmentally Sensitive Area, Do Not Enter, Contact Mono County (760-924-1800) With Any Questions” shall be posted around the exclusion zone for avoidance. The exclusion zone avoidance fence and signs shall be maintained in perpetuity by current and future property owner(s). Alternatively, removal of the identified resource(s) may occur at the request of a Native American tribe for pre-historic resources or historical society for historic-era resources. The removed resources may be reburied at a location selected by the tribe or historical society at their request.

If preservation-in-place and reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to the materials and confer with the tribe for pre-historic resources or historical society for historic-era resources to identify an American Association of Museums-accredited facility that can accept the materials into its permanent collections and provide proper care, in accordance with the 1993 California Curation Guidelines. A curation agreement with an appropriately qualified repository shall be developed between the landowner and museum that legally and physically transfers the materials and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the materials and associated records and the obligation of the project applicant to pay those fees.

### **Mitigation Measure CUL-2: Cultural Resource Monitoring**

## MITIGATED NEGATIVE DECLARATION

A qualified archaeologist approved by the County shall be on-site to monitor all ground disturbing construction activities within 50 feet of any known cultural resource. If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt, the County shall be notified, and the discovery shall be evaluated in accordance with the requirements of Mitigation Measure CUL-3.

### **Mitigation Measure CUL-3: Inadvertent Discovery of Archaeological Resources**

If evidence of any subsurface archaeological features or deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity in the area of the discovery shall be halted within 50 feet of the find, and the finds shall be protected until they are examined by a qualified archaeologist approved by the County. Finds may include but are not limited to:

- Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; stone-milling equipment (e.g., mortars, pestles, handstones, milling slabs); and battered stone tools, such as hammerstones and pitted stones.
- Historic-era materials might include building or structure footings and walls and deposits of metal, glass, and/or ceramic refuse.

A qualified archaeologist who meets the U.S. Secretary of the Interiors professional qualifications in archaeology and is approved by the County shall be retained to assess the significance of the find and make recommendations for further evaluation and treatment as necessary. A Native American representative from a traditionally and culturally affiliated tribe will be notified and invited to assess the find if the artifacts are of Native American ancestry and determined to be more than an isolated find. If, after evaluation, a resource is considered a historical resource or unique archaeological resource (as defined in CEQA Guidelines Section 15064.5), or a tribal cultural resource (as defined in PRC Section 21074), all preservation options shall be considered as required by CEQA (see CEQA Guidelines Section 15126.4 and PRC 21084.3), including possible capping, data recovery, mapping, or avoidance of the resource. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work in the area may resume upon completion of treatment. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public except for information deemed confidential and protected under state law.



## MITIGATED NEGATIVE DECLARATION

### Environmental Determination

On the basis of this evaluation:

|   |                                     |
|---|-------------------------------------|
| I find that the Proposed Project COULD NOT have a significant effect on the environmental, and a NEGATIVE DECLARATION will be prepared  | <input type="checkbox"/>            |
| I find that although the Proposed Project could have a significant effect on the environment, 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. A MITIGATED NEGATIVE DECLARATION will be prepared.  | <input checked="" type="checkbox"/> |
| I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required   | <input type="checkbox"/>            |
| I find that the Proposed Project MAY have a “potentially significant impact” or “potentially significant impact unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. | <input type="checkbox"/>            |
| I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.  | <input type="checkbox"/>            |

Pursuant to Section 21082.1 of the California Environmental Quality Act, Mono County find on the basis of the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the Mitigated Negative Declaration for the proposed project and finds that the Initial Study and Mitigated Negative Declaration reflect the independent judgement of Mono County. Mono County further finds that the project mitigation measures shall be implemented as stated in this Mitigated Negative Declaration.

I hereby approve this project:

|                                |            |      |
|--------------------------------|------------|------|
| Signature                      | Name/Title | Date |
| Community Development Director |            |      |

# 1 Introduction

## 1.1 Introduction

Apogee Farms, Inc. (Apogee Farms) filed applications for a General Plan Amendment, Conditional Use Permit and Cannabis Operation Permit with Mono County (County; Lead Agency) in April 2019. The proposed commercial cannabis operation is located at 23555 Highway 6 (APN 025-020-013), on a parcel that is currently zoned as Rural Residential. The County adopted cannabis regulations through a General Plan amendment in 2017. The County's cannabis regulations prohibit commercial cannabis operations within parcels designated Rural Residential, or within 300 feet of a neighboring parcel under a different land use designation. A General Plan Amendment is needed to change the land use and zoning designation of two parcels from Rural Residential (RR) to Specific Plan (SP) to allow commercial cannabis operation on the project site in compliance with the County cannabis regulations. In addition, the County requires authorization of a Conditional Use Permit (CUP) and Cannabis Operation Permit (COP) for any commercial cannabis operations in the County. The CUP is incorporated into the Specific Plan and would not be adopted separately. The project site is approximately 2.5 miles south of Benton and west of U.S. Route 6 (Highway 6).

## 1.2 Environmental Review Process

The approval of the General Plan Amendment, Specific Plan, Cannabis Operations Permit, and Conditional Use Permit constitutes a "project" that is subject to review under the California Environmental Quality Act (CEQA; Public Resources Code, Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations [CCR], Section 15000 et seq.). The Initial Study (IS) checklist has been prepared as part of the environmental review process needed to evaluate the potential environmental impacts of the Specific Plan and cannabis facility construction and operation proposed by Apogee Farms. The County has incorporated mitigation measures into the project to mitigate the potentially significant impacts identified in the Initial Study such that no significant impacts will occur. The mitigation measures are summarized in the MND and Mitigation Monitoring and Reporting Plan (MMRP), see Appendix A.

## 1.3 Circulation of MND

In accordance with CEQA, the County made a good-faith effort during the preparation of the Initial Study/MND to contact affected agencies, organizations, and persons who may have an interest in the project. In reviewing the Initial Study/MND, affected persons and public agencies

## 1 INTRODUCTION

should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and the ways in which the significant effects of the project were avoided or mitigated.

Comments on the Initial Study/MND were accepted during the 30-day review and comment period in accordance with CEQA Guidelines Section 15205(d). Following the close of the public comment period, which ended on August 15, 2022 at 5:00 pm, the County will consider this Initial Study/MND, and comments thereto, in determining whether to approve the project.

The Initial Study/MND is available at the Community Development Department office, 1290 Tavern Road, Mammoth Lakes, California, 93546, and the Benton Library, 25553 U.S Route 6, Benton, California, 93512, and online at:

<https://www.monocounty.ca.gov/planning/page/apogee-farms-specific-plan-and-mitigated-negative-declaration>

Written comments should be sent to the County's PO Box address or email address as follows:

Mono County Community Development  
Department  
c/o Michael Draper, Planning Analyst II  
P.O. Box 347  
Mammoth Lakes, CA

cddcomments@mono.ca.gov

## 2 Project Description

### 2.1 Project Location

The project site is located at 23555 Highway 6 in an unincorporated area of Mono County, approximately 2.5 miles south of the town of Benton and west of Highway 6. Figure 2.1-1 and Figure 2.1-2 show the project location and project site. The project site includes two parcels, Assessor's Parcel Numbers: 025-020-013 and 025-040-002.

### 2.2 Land Use Designation and Surrounding Land Uses

The project site is within the Benton Planning Area of the General Plan. The land use designation for the project site currently is Rural Residential with a 40-acre minimum lot size (RR-40<sup>1</sup>) and would be amended to Specific Plan (SP) for the purpose of allowing commercial cannabis activities limited to cultivation, processing, and distribution. The parcels adjacent to the project site are designated as Agriculture (AG), Industrial (I), Resource Management (RM), and Rural Residential (RR), as shown in Figure 2.3-2.

### 2.3 Access

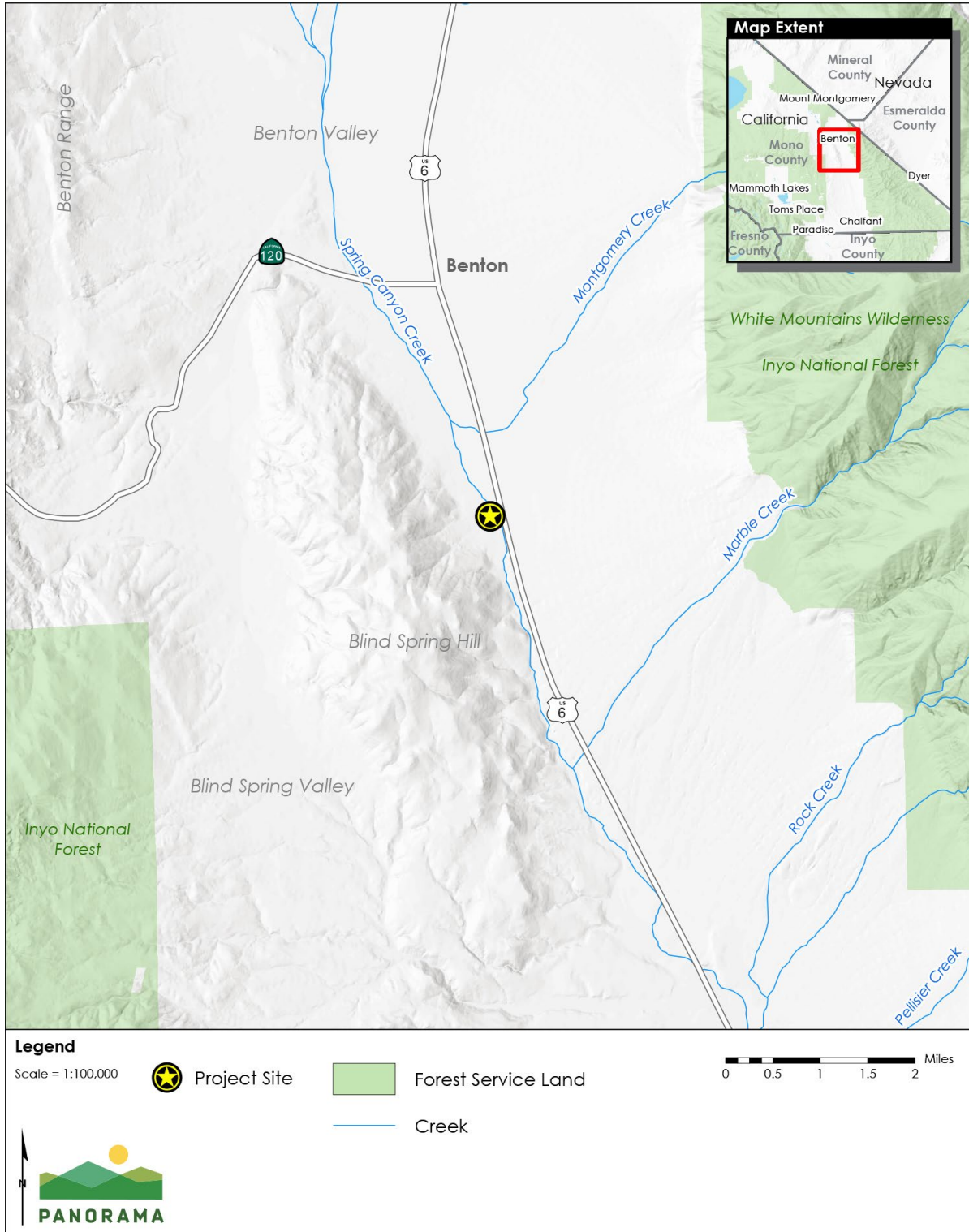
The project site is accessible via an unpaved access road that extends from Highway 6 to the west, providing access to the adjacent parcel to the west. This access roadway within the Highway 6 right-of-way would be paved to meet current California Department of Transportation (Caltrans) standards and encroachment permit requirements. An existing unpaved access road extends south to the location for the proposed facilities in the southwestern corner of the project site, as shown in Figure 2.3-2. Benton is 2.5 miles to the north, and the city of Bishop is 32 miles south of the project site. All project site access roads would be improved to comply with the regulations set forth in Chapter 22 of the County's General Plan, related to fire safety. These improvements include constructing the access road to provide a minimum of two 10-foot traffic lanes, not including shoulder and striping. The access road would provide for two-way traffic flow to support emergency vehicle and civilian egress. The access road would be designed and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds and provide an aggregate base. Turnarounds and turn outs on driveways and dead-end roads would be provided per the County standards.

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<sup>1</sup> As of August 2, 2019, Mono County's zoning maps were superseded by the planning and land use maps contained in the General Plan and Specific Plans (Mono County, 2019b).

## 2 PROJECT DESCRIPTION

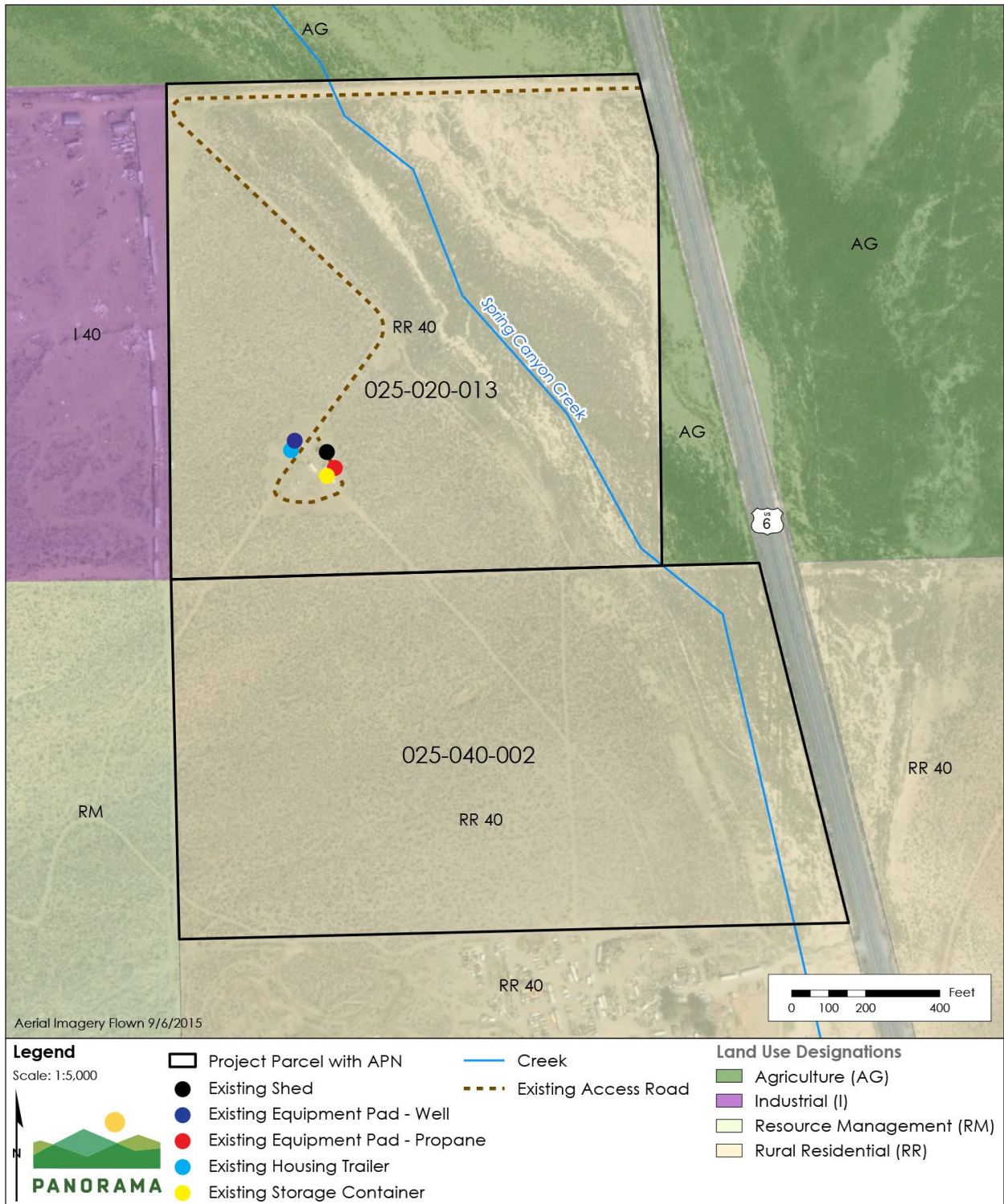
Figure 2.3-1 Project Location



Sources: (USGS, 2019; Tele Atlas North America, Inc., 2019; USGS, 2019)

## 2 PROJECT DESCRIPTION

**Figure 2.3-2 Project Site**



Sources: (Mono County, 2019a; Tele Atlas North America, Inc., 2019; USGS, 2019)

## 2 PROJECT DESCRIPTION

### 2.4 Project Elements

#### 2.4.1 General Plan Amendment and Specific Plan

The project would require a General Plan Amendment, Specific Plan, Conditional Use Permit (CUP), and Cannabis Operation Permit (COP) to allow construction and operation of a commercial cannabis facility on the project site. The project site has an existing land use designation of Rural Residential (RR). Activities related to commercial cannabis cultivation, processing, and distribution are not allowed under the RR designation but are allowed with a CUP under other designations. The proposed General Plan Amendment would change the land use designation of the project site, and the proposed Specific Plan would authorize commercial cannabis activities by incorporating the required CUP. Zoning is incorporated into the Mono County General Plan land use designations. Table 2-1 lists the permitted uses under the proposed Specific Plan compared to the permitted uses under the existing RR designation. The Specific Plan would allow for additional uses, including limited agricultural use and commercial cannabis cultivation, processing, and distribution. Uses that are not currently proposed, and which would require a CUP under the Specific Plan, are not evaluated further in this Initial Study. The IS analyzes the effects of the Specific Plan and proposed commercial cannabis operation compared to baseline conditions and allowable uses under the RR-40 land use designation (*Environmental Planning and Information Council v. County of El Dorado* [1982] 131 Cal.App.3d 354; see also State CEQA Guidelines Section 15125[e]).

**Table 2-1 Existing and Proposed Land Use Designations**

| Uses and Development Standards | Rural Residential (RR-40)– Existing Land Use   | Specific Plan– Proposed Land Use   |
|--------------------------------|--|--|
| Permitted Uses                 | <ul style="list-style-type: none"> <li>• Single-family dwelling</li> <li>• Small-scale agriculture</li> <li>• Accessory buildings and uses</li> <li>• Animals and pets</li> <li>• Home occupations</li> <li>• Manufactured home used as single-family dwelling</li> <li>• Accessory Dwelling Unit (ADU) or Junior Accessory Dwelling Unit (JADU)</li> <li>• Transitional and Supportive Housing</li> <li>• Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act</li> </ul> | <ul style="list-style-type: none"> <li>• Single-family dwelling</li> <li>• Animals and pets (see Animal Standards Section 04.270).</li> <li>• Manufactured home used as a single-family dwelling<sup>a</sup></li> <li>• Accessory Dwelling Unit (as prescribed in Chapter 16 – Accessory Dwelling Units)</li> <li>• Accessory buildings<sup>b</sup> and uses</li> <li>• Farm labor housing</li> <li>• Home occupations (as prescribed in Section 04.290)</li> <li>• Non-commercial composting facilities where the operation does not create a nuisance problem and has less than 100 cubic yards of material on site at any given time</li> </ul> |

## 2 PROJECT DESCRIPTION

| Uses and Development Standards            | Rural Residential (RR-40)– Existing Land Use   | Specific Plan– Proposed Land Use   |
|---|--|--|
| Uses Subject to Director’s Review         | <ul style="list-style-type: none"> <li>• None</li> </ul>   | <ul style="list-style-type: none"> <li>• Minor alteration involving no expansions of square footage or intensification of uses and exempt from CEQA</li> </ul>   |
| Uses Subject to a Specific Plan Amendment | <ul style="list-style-type: none"> <li>• Recreational amenities (e.g., art galleries, country clubs, golf courses)</li> <li>• Kennel</li> <li>• Construction of an accessory building prior to construction of the main building</li> <li>• Mobile home parks</li> <li>• Small-scale agriculture, including limited commercial agricultural activities</li> <li>• Manufactured housing subdivision</li> <li>• Short-term rentals (fewer than 30 consecutive days) in compliance with Chapter 25 of the Land Development Regulations (set forth in Section VI of the Land Use Element) and with a valid Short-term Rental Activity Permit and in compliance with all operational requirements of Chapter 5.65 of the Mono County Code and any applicable area plan policies.</li> </ul> | <ul style="list-style-type: none"> <li>• Any uses other than a permitted use requires an amendment to this Specific Plan</li> <li>• Commercial cannabis activities</li> </ul>  |
| Animals and Pets                          | <ul style="list-style-type: none"> <li>• Minimum Lot Area Required: 10,000 square feet</li> <li>• Animal Units<sup>c</sup> Permitted:               <ul style="list-style-type: none"> <li>– Less than 1 acre: one unit per 10,000 square feet of lot area with Director Review with notice</li> <li>– 1 to 10 acres: one unit per 10,000 square feet of lot area</li> <li>– More than 10 acres: no limit</li> </ul> </li> <li>• Restrictions: Except for movement on and off the property, animals shall not be kept, maintained, or used in any other way, inside or outside any structure, within 40 feet of those portions of any structure used for human occupancy, assembly or habitation, other than the residence of the owner or keeper of such animals.</li> </ul>          | <ul style="list-style-type: none"> <li>• Animal Units permitted by General Plan Section 04.270:</li> </ul>   |
| Maximum Lot Coverage                      | <ul style="list-style-type: none"> <li>• 40 percent</li> </ul>   | <ul style="list-style-type: none"> <li>• 40 percent</li> </ul>   |
| Minimum Setbacks                          | <p>Buildings</p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 30 feet</li> <li>• Side: 30 feet</li> </ul> <p>Accessory Buildings Used as Barns or Stables</p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 30 feet</li> <li>• Side: 30 feet</li> </ul>   | <p>Buildings</p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 50 feet</li> <li>• Side: 50 feet</li> </ul> <p>Accessory Buildings Used as Barns or Stables</p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 30 feet</li> <li>• Side: 30 feet</li> </ul> |



## 2 PROJECT DESCRIPTION

| Uses and Development Standards   | Rural Residential (RR-40)– Existing Land Use     | Specific Plan– Proposed Land Use                 |
|--|--|--|
| Building Density   | • 1 dwelling unit per lot, JADU and an ADU       | • 1 dwelling unit per lot, JADU and an ADU       |
| Population Density   | • 5.02 persons per 5 acres or ~1 person per acre | • 5.02 persons per 5 acres or ~1 person per acre |
| Maximum Building Height  | • 35 feet  | • 35 feet  |
| Notes:   |  |  |
| <b>Bold</b> denotes Specific Plan uses that differ from the RR-40 designation.   |  |  |
| a Provided that the unit is less than 10 years old and meets the criteria set forth in Section 04.280. When two mobile homes are on the same parcel, they must: 1) comply with the Accessory Dwelling Unit requirements; or 2) comply with State standards for a mobile-home park and obtain a use permit from the County.         |  |  |
| b Accessory buildings and uses customarily incidental to any of the permitted uses are permitted only when on the same lot and constructed simultaneously with or subsequent to the main building, including barns, stables and other farm outbuildings and quarters for farm labor or other individuals employed on the premises. |  |  |

### 2.4.2 Commercial Cannabis Cultivation Facility– Use Permit

Commercial cannabis activities are subject a Conditional Use Permit (CUP) pursuant to MCGP LUE Chapter 13. The CUP for the commercial cannabis cultivation, processing, and distribution is incorporated into this Specific Plan as a single approval.

#### Buildings and Structures

The commercial cannabis facility would include up to three greenhouses, a 320-square-foot storage shed, and a processing/distribution facility in the southeast portion of the north parcel, as shown in Figure 2.3-2. No development is proposed on the south parcel. All structures shall have dark earth tone colors and/or non-reflective materials to minimize aesthetics impacts and would be approved by the Mono County Planning Division.

Greenhouses would each be approximately 30 feet by 96 feet, with a height of 16 feet. Corrugated polycarbonate panels would be connected to the greenhouse frame and assembled on site. The panels would be semi-transparent to allow sunlight, however, each greenhouse would also be equipped with light-emitting diodes (LED) for supplemental light, to extend the light cycle for vegging cannabis plants when daylight hours are limited and not sufficient for the growing plants. Automatic black-out curtains would be installed in each greenhouse to prevent light leakage from dusk to dawn. The cultivation area would be surrounded by a chain link fence with a lockable gate, and with earth-toned screening material to restrict visibility and provide security.

The storage shed would comply with Mono County Building and Planning Division standards. The shed would be located within the fenced premise of the cultivation area and would be used for storage of water tanks and materials related to cannabis cultivation.

## 2 PROJECT DESCRIPTION

The processing and distribution facility would be 30 feet by 60 feet , and comply with the California State Building Code. Within this structure, harvested cannabis may be dried, cured, graded, trimmed, rolled, stored, packaged, and labeled in preparation for distribution.

Cultivation initially may be conducted indoors as well as outdoors but would be solely indoors after full project build out. Potential cultivation phases are summarized in Table 2-2.

**Table 2-2 Cultivation Phases**

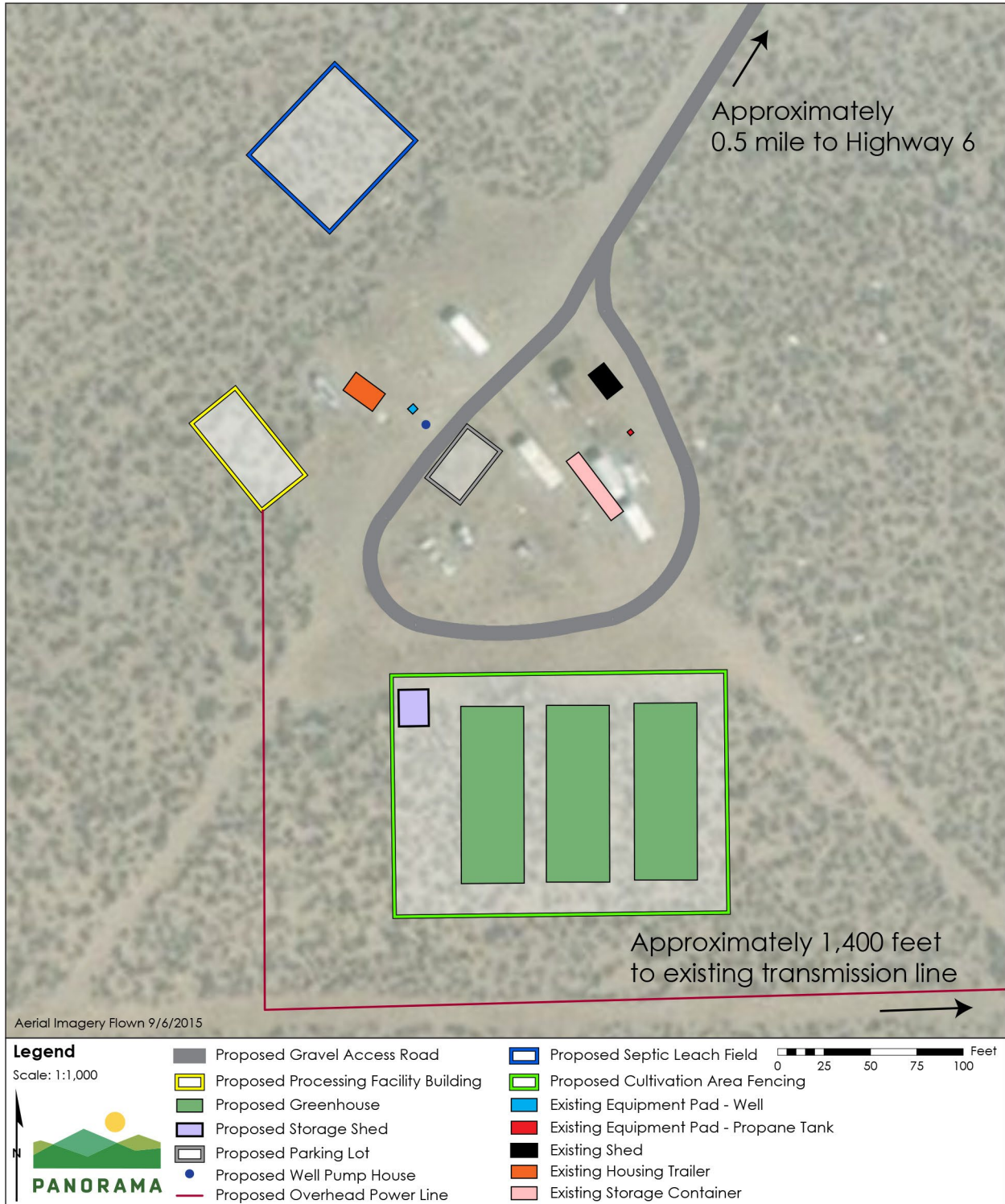
| Phase | Number of Greenhouses | Indoor Cultivation Area (total square feet) | Outdoor Cultivation Area (square feet) | Total Cultivation Area (square feet) |
|-------|-----------------------|---|--|--------------------------------------|
| 1     | 1                     | 2,880                                       | 5,760                                  | 8,640                                |
| 2     | 2                     | 5,760                                       | 2,880                                  | 8,640                                |
| 3     | 3                     | 8,640                                       | --                                     | 8,640                                |

The project components and footprints for full project buildout are summarized in Table 2-3. Existing equipment pads and access roads also are identified. The project would include a processing and distribution facility (referred to as the “processing facility”) for commercial cannabis processing, and distribution activities. The processing facility would be a steel structure, with exterior non-reflective materials and earth-tone colors, constructed on a concrete foundation with a maximum height of 20 feet. Three greenhouses would be constructed southeast of the processing facility, within the cultivation area, either all at once or over the course of three project implementation phases. The greenhouses would be used for indoor cannabis cultivation. Air conditioning units would be used, if necessary, to lower temperatures in the greenhouses. Evaporative cooling walls would be built into the greenhouses to cut down on the amount of time for running individual air conditioning units. The greenhouse locations are shown in Figure 2.4-1. The greenhouse facility would be made of steel posts and beams, with clear plastic walls and ceilings. The total area of cultivation, whether all indoors or a mixture of indoors and outdoors, would occupy less than 10,000 square feet within the fenced 23,400-square-foot cultivation area.

An approximately 320-square-foot storage shed would be constructed northwest of the greenhouses within the cultivation area, with a maximum height of 12 feet. The storage shed would be constructed of treated wood with insulation on a concrete foundation. The storage shed would be used for storage of water tanks, fertilizers, and other materials related to cannabis cultivation.

## 2 PROJECT DESCRIPTION

**Figure 2.4-1 Project Site Components**



*Sources: (Mono County, 2019a; Tele Atlas North America, Inc., 2019; USGS, 2019)*

## 2 PROJECT DESCRIPTION

**Table 2-3 Project Site Components**

| Facility Components  | Footprint (square feet)                                   | Dimensions   |
|--|---|--|
| <b>Existing</b>  |   |  |
| Dirt Access Roads and Turnaround                               | 36,604  | 10 feet x 2,982 feet<br>8 feet x 598 feet  |
| Equipment Pads (Well and Propane Tank)                         | Well: 15.7 <sup>a</sup><br>Propane Tank: 5.7 <sup>a</sup> | --   |
| Shed   | 194.6   | --   |
| Storage Container  | 320   | 8 feet x 40 feet   |
| Housing trailer  | 96  | 8 feet x 12 feet   |
| <b>Proposed Buildout</b>                                       |   |  |
| Graveling of Existing Access Roads and Turnaround <sup>b</sup> | 59,640  | 20 feet x 2,982 feet   |
| Processing Facility  | 1,800   | 30 feet x 60 feet  |
| Greenhouses (Three)  | 8,640   | 30 feet x 96 feet  |
| Storage Shed (Water Tank Enclosure)                            | 320   | 16 feet x 20 feet  |
| Well Pump House  | 32  | 4 feet x 8 feet  |
| Cultivation Area Fencing                                       | --  | 130 feet x 180 feet; 23,400 linear feet  |
| Parking Space  | 500   | 2 parking spaces: 10 feet x 20 feet<br>1 handicap-accessible space:<br>15 feet x 20 feet |
| Septic System (1,000-gallon tank)                              | 3,920 <sup>a</sup>  | Leach line <sup>c</sup> : 120 linear feet<br>or two leach lines: 60 linear feet          |

Notes:

- a Estimated based on site plans.
- b The access roads and turnaround are not new but the project would involve upgrades to the access road to meet County fire safety standards including use of aggregate and roadway expansion to provide two 10-foot traffic lanes.
- c The width of a standard leach line trench ranges from 18 to 36 inches (MCHD 2020).

### Roads and Parking

The commercial and employee access to the project site would be provided via an unpaved road, extending from Highway 6 along the northern boundary of the project parcel. The extent of this roadway is fenced and within an easement that supplies access to the parcel to the west. Vehicles would travel to the northwest corner and continue on the existing road through a locked gate in the fence that leads to the proposed cannabis facility site in the southwest corner. The existing access roads and turnaround would be covered in gravel for internal access to the

## 2 PROJECT DESCRIPTION

processing facility and cultivation area. Driveways and access points would comply with all County fire safety standards to provide entry and egress space for emergency vehicles. Roads would be constructed as described in Section 2.3 -Access above.

A gravel parking area would be on the east side of the processing facility and north side of the cultivation area. Three parking spaces, including one handicap-accessible parking space would be installed in the parking area. The access roads and parking area are shown in Figure 2.1-2.

### **Lighting, Signage, and Fencing**

Project lighting would consist of light-emitting diode (LED) greenhouse lighting and LED lighting installed outside the processing facility and cultivation premise. Lighting in the greenhouses would be used only to extend the light cycle for vegging<sup>2</sup> cannabis plants when daylight hours are limited and not sufficient for the growing plants. Automatic blackout curtains would be installed inside the greenhouses to prevent light leakage from dusk to dawn. Exterior lighting would consist of four motion sensor LEDs placed at each corner of the cultivation area fence and one exterior light on the outside of the processing facility.

No signage would be installed as part of the project. A 6-foot-tall chain link fence, with a lockable gate, would be installed around the cultivation area. The fencing would include screening material of dark, earth tone color to act as a wind break and restrict visibility.

### **Utilities**

#### **Water**

A pump house would be constructed adjacent to the existing on-site well. The pump house would be up to 9 feet tall. Two water holding tanks (2,600 gallons each) would be installed inside the storageshed for water storage.

#### **Wastewater and Sewage**

A 1,000-gallon septic tank with a leach line would be installed north of the processing facility in compliance with Mono County Environmental Health standards.

#### **Energy Supply**

Power for the facility would be supplied by connecting to the existing distribution poles running parallel along the western edge of Highway 6. The power lines would be installed overhead for approximately 1,260 feet along the southern property boundary along an existing dirt road to reach the processing facility. A propane backup-power generator would be installed west of the processing facility. The generator would be required to comply with Title 3, Section 8306 of the CCR, Generator Requirements, for the cannabis cultivation program. A permit from

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<sup>2</sup> Vegging is the period when a cannabis plant is between a seedling/clone and flowering.

## 2 PROJECT DESCRIPTION

the Great Basin Unified Air Pollution Control District (GBUAPCD) would be required if the emergency propane generator exceeds 900 brake horse power (bhp).

### 2.4.3 Construction

The proposed septic tank and field, and energy supply infrastructure would be constructed on the project site before grading activities. Up to 0.54 acre of the site would be graded. The total disturbance area would be up to 1.33 acres. All excavated and graded material would be balanced on the project site. After completion of grading, the processing facility, storage shed, and cultivation area would be constructed, and gravel would be laid on the existing internal access routes and parking area.

Project construction for Phase 1 would occur over approximately six to eight months, starting in 2022 at the earliest, with longer duration anticipated if all three greenhouses are constructed in multiple phases versus over a single phase. A maximum crew size of four workers would be required during construction. A maximum of eight one-way vehicle trips by construction equipment and vehicles would occur daily during construction. Water would be sourced from the on-site well for dust control. The power line, well pump house, and wastewater system would be installed first. The processing facility, cultivation area footprint, and adjacent areas then would be graded to create a flat building surface. Following the grading activity, the processing facility, at least one greenhouse, and the storage shed would be constructed. The greenhouses may be constructed over the course of three project phases, with one greenhouse constructed during each phase. Perimeter fencing would be installed around the footprint of the cultivation area. Imported gravel would be spread on the unpaved roads and turnaround.

The number and type of equipment proposed for project construction would be limited to one backhoe, one bulldozer, one gradall excavator, one dump truck, and one forklift.

### 2.4.4 Facility Operation – Cannabis Operation Permit

Facility operations would include cannabis cultivation, processing, and distribution.

#### Cultivation

Cannabis cultivation would include mother plant cloning and outdoor cultivation, followed by construction of greenhouses for indoor cultivation. Mother plants would be kept and cut in the processing facility. The cuttings would be transported to cultivation areas which may include the outdoor cultivation areas, or to greenhouses for replanting. Each greenhouse may grow up to 2,200 plants, and up to 15,000 plants total could be on site, including clones and mother plants when all three greenhouses are in full operation.

#### Processing and Distribution

The mature plants then would be taken to the processing facility. The processing facility would house all drying, curing, extraction, and packaging activities. Water tanks, fertilizers, and equipment needed for cultivation would be stored in the storage shed in the northwest corner of the cultivation area.

## 2 PROJECT DESCRIPTION

### Utilities

#### Water Supply and Use

Water for construction and operation would be sourced from the existing on-site well. Water would be used for dust control during construction, plant cultivation, and domestic uses. Daily water usage is estimated to be 600 gallons per day during operation. The cannabis cultivators would maintain daily water use records for 5 years and make all records available for the State Water Resources Control Board (SWQCB) and California Department of Fish and Wildlife (CDFW) review, per the Cannabis Cultivation Policy prepared by SWQCB (2019).

#### Wastewater and Sewage

The sources of wastewater would include excess irrigation, domestic uses, and a reverse osmosis (RO) filtration reject stream. Wastewater from excess irrigation would be reclaimed by running it through the RO system and re-using the filtered water for operation. A minimal amount of water would be rejected as part of the RO system. The rejected water and domestic uses wastewater would be discharged to a septic system.

The project facility would be equipped with a septic system for effluent and discharge wastewater. The project applicant has contacted the Mono County Department of Environmental Health about septic regulations and would comply with requirements set forth by the County to ensure the approval of a septic permit. The cannabis effluent would also need to comply with the requirements of the SWRCB Cannabis Cultivation General Order.

#### Waste Disposal

Several distinct types of waste may be produced at the cultivation facility, including green waste, solid waste, and potentially hazardous waste, such as cleaners or fertilizers. Green waste would be composted on the project site. Other solid waste and hazardous waste would be hauled to a County landfill or disposal site.

#### Energy Supply

Southern California Edison (SCE) would supply electric power to the project site, and a backup propane-powered generator would be used for emergency power.

#### Telecommunication

AT&T Inc. would be the telecommunications service provider for the project.

#### Odor Management

Odor would be generated by outdoor cultivation. The distance between the plants and sensitive receptors, and the prevailing winds are anticipated to mitigate nuisances to surrounding properties.

The greenhouses would be equipped with a ventilation system to control odors, humidity, and mold in accordance with Mono County code. Each greenhouse will have two exhaust vents for a total of six exhaust vents with three greenhouses. Each exhaust vent will contain a Cannabuster™ iodine mister or equivalent. The mister will be used during times of flowering, if determined necessary by facility personnel or the County, or if complaints of odor are received.

## 2 PROJECT DESCRIPTION

### Personnel

One person would live on site in a portable trailer and be an on-site employee at the cannabis facility. One to two additional employees would be hired seasonally during harvests.

### Traffic Generation

Employees would generate an average of four one-way trips a day, Monday through Friday. Cannabis wholesale distribution during harvest would necessitate up to three round-trip truck trips per month to retail locations.

## 2.5 Agency Jurisdiction and Approvals

Mono County is the CEQA lead agency for discretionary review of the project. Other permits and approvals that would be required for the project are listed in Table 2-4.

**Table 2-4 Required Permits and Approvals**

| Permit or Approval  | Agency  | Function  |
|---|---|---|
| General Plan Amendment  | Mono County Board of Supervisors                                | For amendments to the General Plan including a land use designation change of a property. |
| Conditional Use Permit  | Mono County Community Development Department, Planning Division | For commercial cannabis cultivation, processing, and distribution activities              |
| Cannabis Operations Permit  |   | For operation of the commercial cannabis cultivation facility                             |
| Building Permit   | Mono County Community Development Department, Building Division | For construction of the cultivation facility  |
| Grading Permit  | Mono County Public Works – Engineering                          | For grading in excess of 10,000 square feet   |
| Septic Permit   | Mono County Department of Environmental Health                  | For septic system installation and sewage disposal  |
| Cannabis Cultivation License  | Department of Cannabis Control Cultivation Licensing            | License for cannabis cultivation in California  |
| <u>Cannabis Distribution License</u>  |   | <u>License to transport cannabis in California</u>  |
| Construction General Permit,  | State Water Resources Control Board                             | For surface disturbance greater than 1 acre   |
| 401 Water Quality Certification or Porter-Cologne Water Quality Control Act |   | Grading, trenching, or other discharge of fill to waters of the state.                    |
| Cannabis Cultivation General Permit   |   | For cannabis cultivation  |



## 2 PROJECT DESCRIPTION

| Permit or Approval                       | Agency   | Function  |
|--|--|---|
| General Plan Amendment                   | Mono County Board of Supervisors                   | For amendments to the General Plan including a land use designation change of a property.   |
| Secondary Source Permit                  | Great Basin Unified Air Pollution Control District | For construction of the processing facility, greenhouses, storage shed, and well pump house |
| Generator permit                         |  | For propane generators greater than 900 bhp   |
| Encroachment Permit                      | California Department of Transportation            | For accessing State right-of-way  |
| Lake and Streambed Alternation Agreement | California Department of Fish and Wildlife         | Grading, trenching, or other discharge of fill to waters of the state.                      |

### 3 Environmental Checklist

#### 3.1 Environmental Factors Potentially Affected

This IS checklist includes an evaluation of impacts based on the State CEQA Guidelines Appendix G Environmental Checklist. Each checklist item is explained in the discussion following the checklist and, if necessary, mitigation measures are presented that would reduce the impacts to a less-than-significant level. In accordance with CEQA, Mono County considered the whole of the action when evaluating impacts, including on- and off-site effects, direct and indirect effects, and effects from both construction and operation of any new development.

Each checklist criterion is marked to identify what level of an environmental impact would occur, as follows:

- *No Impact* indicates that no impact would occur on the resource.
- *Less than Significant Impact* indicates that although some impact would occur, the impact would be below the threshold of significance, or existing regulations and legal standards would reduce these impacts to a less-than-significant level.
- *Less than Significant with Mitigation* indicates that impact potentially would be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.
- *Potentially Significant Impact* indicates impacts that would exceed the defined standard of significance. The impact cannot be reduced to a less-than-significant level by incorporating mitigation measures. An environmental impact report must be prepared for this project.

#### 3.2 Aesthetics

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <b>1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:</b>  |                                |  |                              |                                     |
| a) Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

### 3 ENVIRONMENTAL IMPACT CHECKLIST

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

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

- a) **Would the project have a substantial adverse effect on a scenic vista? And,**
- b) **Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site is bounded by open space to the north and west, agricultural use to the east, and rural residential uses to the south. Highway 6 is approximately 1,000 feet east of the project site but is not eligible for scenic highway status, per Section 263 of the Streets and Highway Code (California Legislative Information, 2019). Highway 120 is the nearest scenic highway as designated by the County and is approximately 2.2 miles north of the project site. The nearest state scenic highway is U.S. 395, approximately 18 miles to the southwest (Mono County, 2015). No scenic vistas or resources are on or adjacent to the project site.

The project site is not visible from any designated scenic highway because of its distance from any of them and the relatively flat topography in the project vicinity. No existing or eligible state scenic highways, scenic roadways, or scenic vistas are in the project vicinity that would afford a view of the site. Development of the project site under the General Plan Amendment, Specific Plan, and Cannabis Use Permit would not be visible from a scenic vista or scenic highway. No impact would occur.

- c) **In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan LUD would allow for development of a single-family dwelling unit and accessory dwelling unit addition to the structures proposed for the Cannabis Use. A single-family dwelling unit and accessory dwelling unit on the property would be visually similar to other residential structures in the surrounding area and would not degrade the existing visual character or quality of view of the site. The impact would be less than significant.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

#### **Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The project would involve construction of a commercial cannabis cultivation facility. The facility would be one story and would have a similar profile to structures on nearby parcels. The processing facility would be a steel structure of dark or earth tone color with non-reflective surfaces, similar to nearby existing metal structures to the west, and generally would be consistent with the existing visual character of the area to the west. The cultivation area would be enclosed by a 6-foot-tall chain link fence and screening of dark, earth-tone color similar to shaker gray, which would reduce visibility of the facility from public view. Furthermore, the facility would be set back from Highway 6 by more than 1,000 feet, further limiting its visibility. The facility would also have an overhead distribution line for approximately 1,260 feet. The overhead distribution line poles would appear visually similar to the power poles located along Highway 6 and would not substantially change the visual quality of the area. The facility would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The impact would be less than significant.

- d) **Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?**

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for installation of additional lighting associated with a residential dwelling unit or accessory dwelling unit in addition to that proposed for the cannabis facility. Because the area has little development, minimal lighting, and is very dark, the light produced from additional outdoor lighting could adversely affect nighttime views and cause a significant impact. Mitigation Measures DARK-1 requires implementation of dark-sky compliant lighting consistent with the County Dark Sky Regulations, which would avoid creation of significant light above the horizontal plane of the fixture and would protect nighttime views. The impact would be less than significant with mitigation.

**Mitigation:** Implement Mitigation Measure DARK-1

#### **Mitigation Measure DARK-1: Dark Sky Compliance**

The Mono County Outdoor Lighting Ordinance (also known as the 'Dark Sky Regulations') was adopted to protect night sky views, enhance travel safety, conserve energy and limit light trespass and glare by restricting unnecessary upward projection of exterior lighting. The regulations prohibit nonconforming light of all types, including signage, fixtures, outdoor sports, recreation and entertainment. The County pairs the Dark Sky regulations with information and guidelines, including educational materials distributed to provide applicants with design recommendations and suggestions for minimizing intrusive light sources (General Plan Land Use Element Ch. 23).

Exterior lighting on the project site shall be subject to requirements of the Mono County General Plan, Chapter 23 Dark Sky Regulations. The Dark Sky

### 3 ENVIRONMENTAL IMPACT CHECKLIST

Regulations are comprehensive, adaptive, and designed to meet six specific objectives that include:

- To promote a safe and pleasant nighttime environment;
- To protect and improve safe travel;
- To prevent nuisances caused by unnecessary light;
- To protect night sky views;
- To phase out existing nonconforming fixtures; and
- To promote lighting practices and systems to conserve energy

Further, only full cutoff luminaires with light source downcast and fully shielded, with no light emitted above the horizontal plane are permitted. Kelvin color temperature should be approximately 2,300 K, and temperatures over 3,000 K are prohibited. Exterior lighting shall be limited to that required for security and safety.

#### **Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The facility would introduce new lighting in the area. Light deprivation curtains would be installed inside the greenhouses to eliminate light leakage into the surrounding environment from dusk to dawn. The cultivation area would be fenced with chain link and dark, earth-tone colored screening material, and all proposed outdoor lighting would comply with the County's Dark Sky Regulations. Downcast, fully shielded lighting, with no light emitted above the horizontal plan would eliminate unnecessary night sky illumination, in accordance with CCR Title 3, §§ 8304(c) and 8304(g), general environmental requirements for cannabis cultivation program and CCR §16304 (a)(7) which requires that lights are shielded from sunrise to sunset. Kelvin color temperature should be approximately 2,300 K, and temperatures over 3,000 K are prohibited. The proposed project would not create a substantial source of new nighttime or daytime light. The processing facility and storage shed would consist of steel and wood structures. Steel cladding and framing on commercial buildings typically would be brushed or treated so that the material would not create a new source of glare and of dark, earth tone colored. The chain link fence and screening around the cultivation area also would minimize any potential glare from the greenhouses. Therefore, the project would not create a new source of glare. The impact from the new lighting and glare would be less than significant.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

## 3.3 Agriculture and Forestry Resources

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|---|--------------------------------|--|------------------------------|-------------------------------------|
| <p><b>2. AGRICULTURE AND FORESTRY RESOURCES.</b> 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p> |                                |  |                              |                                     |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| 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))?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

- a) **Would the project 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?**

### General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)

The County has not been mapped pursuant to the Farmland Mapping and Monitoring Program; therefore, neither the project site nor adjacent parcels are on Prime Farmland or Farmland of Statewide Importance. No impact would occur.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

**b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site currently is designated RR and does not allow for commercial agricultural activities. The proposed project would allow commercial cannabis cultivation, processing and distribution, including a nursery. The project would involve cannabis cultivation and related allowable activities in compliance with the CUP and COP. Project activities and the General Plan and Specific Plan would allow for cannabis-related agricultural uses and would not conflict with any zoning for agricultural use because there is no existing agricultural zoning on the site. Although parcels to the north and east of the project site, and east of Highway 6 are under Williamson Act contracts, the project site is not under a Williamson Act contract (Mono County 2020a). Thus, the project would not conflict with zoning for agricultural use under any Williamson Act contract. No impact would occur.

**c) Would the project 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))?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site and adjacent parcels are not zoned as forest land or timberland. The project would not conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

**d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site and adjacent parcels are not zoned as forest land and do not contain any forests. The project would not convert forest land to non-forest use. No impact would occur.

**e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

No agricultural or farming operations currently occur on the project site. Small-scale agriculture is a permitted use for the properties include in this project, compliant with the MCGP. The project would not convert agricultural land or uses to non-agricultural use. No impact would occur.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

#### 3.4 Air Quality

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</b> |                                |  |                                     |                                     |
| a) Conflict with or obstruct implementation of the applicable air quality plan?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Expose sensitive receptors to substantial pollutant concentrations?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?   | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/>            |

#### Overview

The project site is within the Great Basin Valley Air Basin (GBVAB), under the jurisdiction of the Great Basin Unified Air Pollution Control District (GBUAPCD). State and federal air quality standards have been developed to protect public health and welfare. Regional air pollution generally is a cumulative impact because no single project is sufficient in size to result in nonattainment of air quality standards. Instead, a project’s individual emissions contribute to existing cumulative air quality impacts. If a project’s contribution to cumulative air quality impacts is considerable, the project’s impact on air quality would be considered significant. The area of the GBVAB in which the project site is located is in State nonattainment for ozone. (CARB, 2018). The project area is not within an area that has an adopted State Implementation Plan (SIP).

**a) Would the project conflict with or obstruct implementation of the applicable air quality plan?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

No air quality plan has been adopted that would apply to the project site (GBUAPCD, 2019). Therefore, the project would not conflict with or obstruct implementation of an air quality plan. No impact would occur.

**b) Would the project 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?**



### 3 ENVIRONMENTAL IMPACT CHECKLIST

#### **Overview**

Construction and operation of the cannabis facility under the Specific Plan would comply with GBUAPCD Rules. GBUAPCD Rules 401 and 402 require use of control measures to minimize fugitive dust and particulate matter emissions. The analysis below provides quantitative emissions from project-related activities compared to numerical significance thresholds to determine level of impact. The quantitative emissions levels assume no control measures are implemented. GBUAPCD has the authority to enforce control measures for fugitive dust and particulate emissions under Rules 401 and 402; therefore, emissions are expected to be less than those presented in the analysis below.

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for construction of a residential dwelling unit as well as an accessory dwelling unit. Construction and operation of the residential facilities would require less operating equipment than the cannabis facility and would therefore result in less emissions than the cannabis facility analyzed above. The impact from the General Plan Amendment would be less than significant.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

##### **Construction**

Construction and installation of the cannabis facility would occur over approximately six to eight months, starting in 2022 at the earliest, with the longer duration anticipated if all three greenhouses are constructed in multiple phases versus over a single phase. For the purposes of this analysis, it was assumed that all three greenhouses would be constructed in a single phase as this would represent the greatest construction emissions in a single year. Use of construction equipment and construction-related earth-moving activities would generate fugitive dust and other pollutant emissions. Emission estimates for the cannabis facility construction and operation were calculated using CalEEMod version 2020.4.0. The detailed air quality model emissions calculations are provided in Appendix B.

The GBUAPCD and Mono County have not established CEQA thresholds for air quality emissions. However, if the lead agency does not have sufficient expertise in evaluating air quality impacts, thresholds adopted by an agency with greater expertise may be used (CAPCOA, 2008). The South Coast Air Quality Management District (SCAQMD) provides air quality significance thresholds for construction and operation (SCAQMD, 2019). For this project, the CEQA significance thresholds used by the SCAQMD have been adopted as representative significance thresholds because the SCAQMD has developed thresholds for attainment of ozone and PM10 standards, and the project area currently is in a nonattainment area for both standards. Projects that would result in criteria air pollutant emissions below these significance thresholds would not result in a cumulatively considerable net increase in criteria air pollutants that are in nonattainment within the air basin. Construction emissions in 2022 would not exceed the numerical significance thresholds, as shown in Table 3-1. Construction activities would comply with the GBUAPCD rules described above, which would require the use of control measures to minimize fugitive dust and particulate matter emissions.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

Construction of the cannabis facility would not result in a cumulatively considerable net increase for any pollutant that is in nonattainment. The impact from construction of the cannabis facility would be less than significant.

**Table 3-1 Construction Emissions from the Cannabis Facility**

| Estimated Maximum Daily Pollutant Emissions (pounds/day) |                  |                 |           |           |                  |                   |
|--|------------------|-----------------|-----------|-----------|------------------|-------------------|
|  | VOC <sup>a</sup> | NO <sub>x</sub> | CO        | Sox       | PM <sub>10</sub> | PM <sub>2.5</sub> |
| Peak Daily Emission                                      | 28.1             | 19              | 14.5      | 0.04      | 8.0              | 4.14              |
| SCAQMD Emissions Threshold                               | 75               | 100             | 550       | 150       | 150              | 55                |
| <b>Threshold Exceeded?</b>                               | <b>No</b>        | <b>No</b>       | <b>No</b> | <b>No</b> | <b>No</b>        | <b>No</b>         |

Note:

**a** For this analysis, VOC emissions are assumed to be equal to ROG emissions.

#### Operation and Maintenance

The cannabis facility would be operational in 2023 at the earliest. Operational emissions would result from energy use to operate the greenhouses and other facilities, vehicle trips to and from the project site, and the proposed back-up generator. Operation of the cannabis facility would comply with the GBUAPCD rules described above, which would require use of control measures to minimize fugitive dust and particulate matter emissions. Emissions associated with operation of the cannabis facility would not exceed the significance thresholds, as shown in Table 3-2. Operation of the cannabis facility would not result in a cumulatively considerable net increase for any pollutant that is in nonattainment, and thus the impact would be less than significant.

**Table 3-2 Operational Emissions from the Cannabis Facility**

| Estimated Maximum Daily Pollutant Emissions (pounds/day) |                  |                         |            |                 |                  |                   |
|--|------------------|-------------------------|------------|-----------------|------------------|-------------------|
|  | VOC <sup>b</sup> | NO <sub>x</sub>         | CO         | SO <sub>x</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
| Existing Conditions <sup>a</sup>                         | 1.6              | 0.7                     | 3.1        | 0.005           | 1.5              | 0.4               |
| Full Buildout Peak Daily Emissions                       | 2.1              | 0.3                     | 3.9        | 0.007           | 11.7             | 1.5               |
| <b>Net Operational Emissions</b>                         | <b>0.5</b>       | <b>-0.4<sup>c</sup></b> | <b>0.8</b> | <b>0.002</b>    | <b>10.2</b>      | <b>1.1</b>        |
| SCAQMD Emissions Threshold                               | 55               | 55                      | 550        | 150             | 150              | 55                |
| <b>Threshold Exceeded?</b>                               | <b>No</b>        | <b>No</b>               | <b>No</b>  | <b>No</b>       | <b>No</b>        | <b>No</b>         |

### 3 ENVIRONMENTAL IMPACT CHECKLIST

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Notes:

- b Modeled NO<sub>x</sub> emissions are generated from the diesel generator currently used to operate the existing trailer and well pump.
  - c For this analysis, VOC emissions are assumed to be equal to ROG emissions.
  - d During operation of the cannabis facility, the diesel generator that currently is used to power the on-site trailer and well pump would not be used, resulting in a negative emission of NO<sub>x</sub>.
- 

**c) Would the project expose sensitive receptors to substantial pollutant concentrations?**

**General Plan Amendment**

The boundary of the southern parcel is approximately 230 feet from the nearest receptor, a single-family residence. The closest that any future development under the Specific Plan could occur, such as a non-commercial composting facility, would be 260 feet away from the nearest residence<sup>3</sup>. The General Plan Amendment would generally allow for housing, and non-commercial composting, none of which would expose sensitive receptors to substantial pollutant concentrations.

**Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Construction of the buildings and structures associated with the cannabis facility, which would be approximately 1,475 feet from the nearest receptor, would occur for up to 8 months in 2021, or longer if the facility is constructed over multiple phases. During this construction, equipment and vehicles would be used that would emit toxic air pollutants. Equipment and trucks would be used minimally during operation of the cannabis facility.

On-site activities would comply with GBUAPCD rules, which would require implementation of fugitive dust and particulate matter control measures. Equipment used for future construction or agricultural uses would be required to comply with federal and State engine emission standards (e.g., U.S. Environmental Protection Agency phasing of nonroad compression ignition exhaust emission standards), for both new and existing equipment. CARB has required equipment owners to phase out less efficient equipment by banning fleet owners from adding less efficient equipment to their fleet. Tier 0 vehicles were banned in 2014, Tier 1 vehicles were banned in 2014, and Tier 2 vehicles were banned in 2018 for large and medium fleets and 2023 for small fleets. The air modeling provided above assumed use of Tier 2 equipment to provide a conservative analysis. Emissions standards increasingly are more stringent. Use of equipment complying with emission standards would minimize particulate matter and other toxic air contaminants. Sources of toxic air contaminant emissions from the cannabis facility uses include motor vehicle and backup generator emissions. A generator is currently used on the project site. A new propane backup generator would be installed to support cannabis facility operations,

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<sup>3</sup> This distance is calculated according to the distance to the southern parcel boundary plus the requirement for a minimum side setback for accessory buildings of 30 feet. The minimum setback for primary buildings is 50 feet.

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which could be tested for up to 50 hours a year, which would not create significant pollutant concentrations due to the short period of use. Generator use would comply with California Air Resources Board and GBUAPCD regulations including acquiring a permit if the generator exceeds 900 brake horsepower and airborne toxic control measures for generators (CCR Title 17 §93115 [and CCR Title 4 §16306](#)). Because the project is located more than 1,000 feet from the nearest sensitive receptor and does not involve use of any new stationary sources of emissions, it would not expose receptors to pollutants. Power for the proposed facility would be delivered from a new overhead power line. No new sources of emissions would be used in the cultivation or processing of the cannabis. Therefore, the impact on sensitive receptors from construction and operation of the cannabis facility would be less than significant.

- d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

#### **General Plan Amendment**

The General Plan Amendment would allow for non-commercial composting where the composting does not create a nuisance. The composting could generate odors but composting would only be allowed if it did not result in nuisance odors at adjacent properties. Therefore, the General Plan Amendment to the Specific Plan land use designation and zoning would not result in other emissions adversely affecting a substantial number of people.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

##### **Construction**

Diesel exhaust from construction equipment and vehicles would generate some odors, which could increase the odors temporarily in the immediate vicinity of the equipment operation. The odors would dissipate rapidly with distance from the odor-generating activity. The generation of odors from use of diesel engines would not be substantial or permanent. Only one sensitive receptor (residence) is approximately 1,500 feet south of cannabis facility site and immediately south of the southern project parcel. Construction activities would occur in the northern parcel at the cannabis facility, and use of construction equipment and vehicles in closer proximity to the residence would be temporary and limited in duration. Because of the distance between the project site and nearest sensitive receptor, the general lack of a substantial number of sensitive receptors in the project vicinity, and temporary and limited duration of construction activities, a substantial number of people would not be subjected to objectionable odors. Therefore, the impact would be less than significant.

##### **Operation and Maintenance**

Research indicates that organic compounds called terpenes are found in a variety of plants, and that they give each plant their unique odor. When in higher concentrations, terpenes produce a stronger odor that can serve as a plant's defense mechanism or attract pollinators. As the cannabis plants grow in the greenhouses, the levels of terpenes in those plants also increases, leading to stronger odors. Cannabis plants are known to have a unique and sometimes pungent odor, which in high concentrations can be objectionable to people living or working near cannabis facilities.

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Anecdotal evidence suggests that strong cannabis odors can be detected at least 600 feet away, although it also has been stated that the odor can be noticed up to 1 to 2 miles away from the source (Santa Barbara County, 2017). Operation of the cannabis facility would have the potential to generate substantial odors, which are defined as odors that could be a nuisance to surrounding populations. Cultivation could initially be conducted partially outdoors during the early phases of the project with the least amount of cultivation area. Cultivation would then be conducted indoors after full build out of the facility. Odors generated from outdoor cultivation would not be contained. Because odors from outdoor cultivation would not be captured or eliminated, these odors could affect sensitive receptors in proximity to the facility. The project vicinity is sparsely populated. As mentioned above, the nearest sensitive receptor is an off-site residence located 1,500 feet from the project site. An estimated four residences are located within one mile of the facility and 39 residences are located within two miles of the facility. The residences within two miles of the facility would be expected to house 113 individuals assuming an average household size of 2.91 individuals consistent with the demographics of the census tract. The individuals within two miles of the project site represent approximately three percent of the census tract and 0.79 percent of the County population.

The Benton community is located approximately 2.5 miles north of the project and beyond any distance that cannabis odor has been reported as detectable. The prevailing wind direction in the area is typically from the south during the day and from the north/northeast during the night with average annual wind speeds of nine miles per hour and annual peak gusts of 70 miles per hour (Mono County, 2008; WRCC, 2015). While there are no residences located within 600 feet of the facility where cannabis odors are known to be detectable, it is possible that odors could be detected infrequently. At the estimated 39 residences up to two miles from the facility, cannabis odors could be detectable during cultivation when odor generation is greatest in late summer and depending on atmospheric conditions. The project includes implementation of odor control measures including use of Cannabuster™ iodine misters during flowering for indoor cultivation. Due to the low number of receptors in proximity to the facility and low likelihood of detecting odors one to two miles away from the facility, the project odors would not affect a substantial number of people. While the impact would not affect a substantial number of people, the County's cannabis regulations require odor control for cannabis facilities to ensure cannabis odors are less than significant. The cannabis odors could become a nuisance if the odor control system were not properly maintained and functioning during the cannabis operation. Mitigation Measure AQ-1 requires that the applicant maintain the odor control system over the life of the project and conduct monitoring to ensure odors are controlled during cultivation. Therefore, the impact would be less than significant with mitigation.

**Mitigation:** Implement Mitigation Measure AQ-1.

#### **Mitigation Measure AQ-1: Odor Control Measures**

- The project applicant shall install an odor control system for indoor cultivation. The odor control system must meet or exceed an odor removal efficiency of 91 to 96 percent, consistent with the proposed Cannabuster™

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odor elimination system (Pinchin, 2020) . The odor control system shall be properly maintained and implemented throughout the life of the project for facilities to control odors from facility processes that produce nuisance odors at the nearest residential property.

- The applicant shall post signs at the property line that provide a project contact phone number in the case of nuisance odors.
- The applicant shall report any complaints of nuisance odors to the County within 72 hours of the complaint.
- The County may request modifications to the odor control system during project operation should nuisance odors persist at the property boundary after application of the odor control system.
- If odor from outdoor cultivation is determined to be a nuisance, the County may require cultivation to be moved to the indoor greenhouses by the next cultivation cycle.

## 3.5 Biological Resources

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>4. BIOLOGICAL RESOURCES. Would the project:</b>   |                                |  |                                     |                                     |
| 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? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 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 US Fish and Wildlife Service?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

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| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

#### Overview

##### Regional Setting

The project site is in an unincorporated area of Mono County in Benton Valley, which contains an arid valley floor habitat dominated by extensive unforested shrublands. The landscape is generally flat and comprised of undeveloped open space, rural, and agricultural uses.

##### Field Surveys

On November 8, 2019, biologist Russell Kokx conducted a reconnaissance-level survey of the 80-acre project site. The reconnaissance survey documented the environmental settings, including vegetative communities, soils, elevations, habitats, and conditions. This survey was conducted to evaluate the potential for special-status species to occur. Biological database searches, including U.S. Fish and Wildlife Service (USFWS), California Natural Diversity Database (CNDDB), California Native Plant Society, and National Wetland Inventory, for the project vicinity were conducted in May 2019.

Mr. Kokx conducted focused botanical surveys of the project site on May 28 and June 17, 2020 (Appendix C). Surveys were conducted during optimal conditions to determine whether special-status plant species or their habitats were present in the project site (Panorama Environmental, Inc., 2020).

#### Environmental Setting

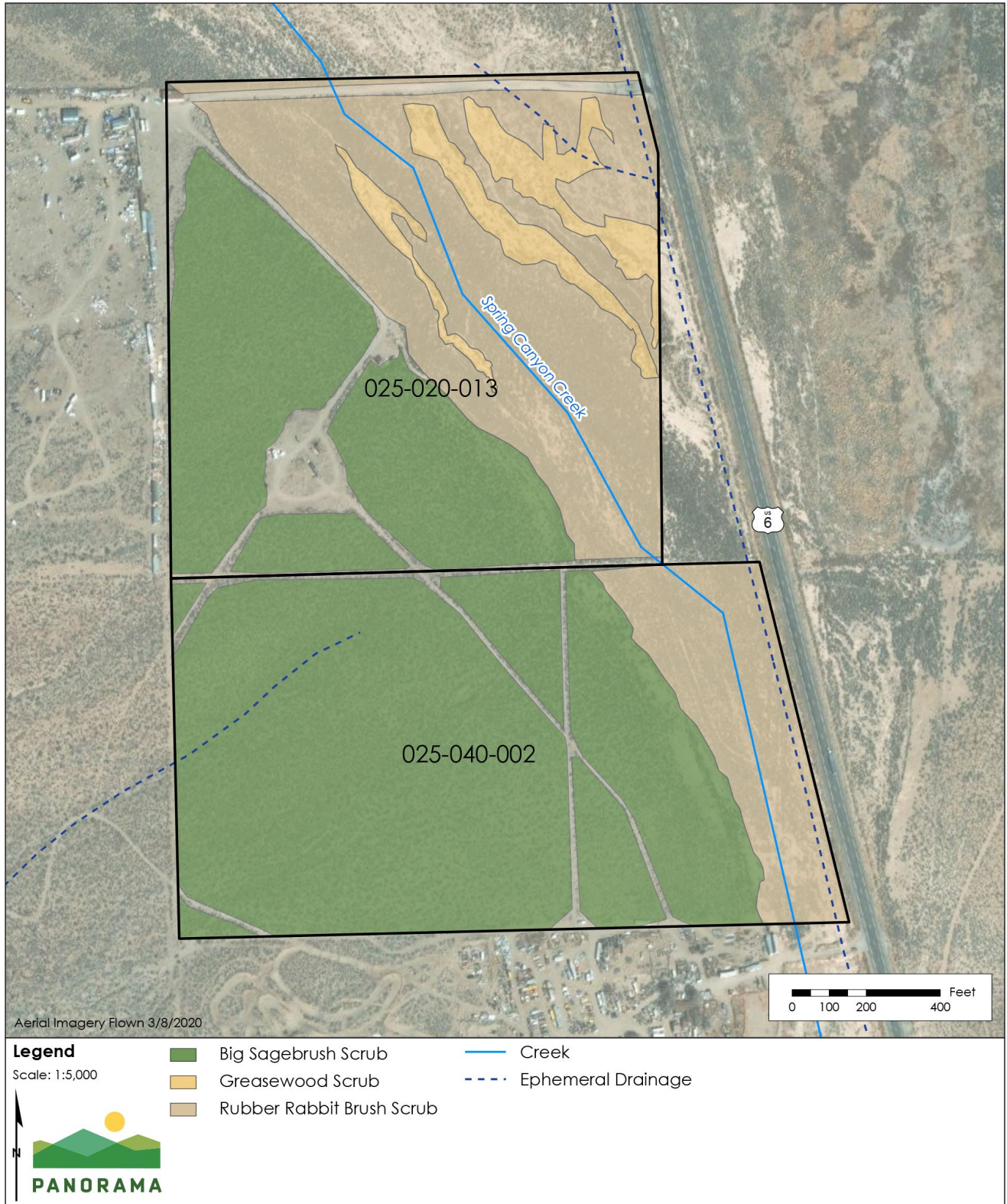
##### Natural Communities

The project site encompasses three vegetative communities: Big Sagebrush Shrubland Alliance (*Artemisia tridentata*), Rubber Rabbit Brush Scrub Shrubland Alliance (*Ericameria nauseosus*), and several small inclusions of Greasewood Scrub Shrubland Alliance (*Sarcobatus vermiculatus*) (Figure 3.4-1).

The dominant perennial vegetation in Big Sagebrush Shrubland Alliance includes big sagebrush, rubber rabbit brush (*Ericameria nauseosus*), spiny hopsage (*Grayia spinosa*), Nevada joint fir (*Ephedra nevadensis*), spotted dalea (*Psoralea polydenius*), and catclaw horsebrush (*Tetradymia axillaris* var. *axillaris*). Understory plants were not surveyed during the growing season, but identifiable species included devil's lettuce (*Amsinckia tessellata*), Mono buckwheat

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Figure 3.4-1 Vegetation Communities in the Project Site





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(*Eriogonum ampullacea*), white-stem blazing star (*Mentzelia albicaulis*), purple root (*Cryptantha circumcissa*) and sticky lessingia (*Lessingia glandulifera*).

The Rubber Rabbit Brush Scrub Shrubland Alliance vegetation occurs as the grade tapers off near the bottom of the valley, portions of which historically were flooded. This area still accumulates moisture and supports more facultative species. The soil is derived from the accumulation of minerals through springs, ponding, and evaporation. The soil is light to white in color and very fine with a high alkalinity. The dominant perennials include dense stands of rubber rabbit brush with scattered Alkali sacaton (*Sporobolus airoides*) and big sagebrush. The understory is saltgrass (*Distichlis spicata*), five horn bassia (*Bassia hyssopifolia*), western nitrophila (*Nitrophila occidentalis*), and povertyweed (*Iva axillaris*).

The Greasewood Scrub Shrubland Alliance vegetation community occurs only in small, highly alkaline inclusions at the bottom of alkali sinks in the project area. The dominant shrub is monotypic stands of greasewood. No annuals were observed in the understory; however, this habitat is well suited for potentially supporting several rare plant species in spring. One sensitive vegetation community, greasewood scrub in alliance with *Suaeda nigra*, was observed in small pockets within the greasewood scrub shrubland alliance on the project site during the focused botanical surveys.

#### **Wetlands and Other Water Bodies**

The eastern portions of the project site occur at the base of Chalfant Valley. The soil is derived from the accumulation of minerals through springs, ponding, and evaporation. These soils have a higher moisture content and support some facultative plant species as a result. State jurisdictional drainages include Spring Canyon Creek and an ephemeral drainage along the eastern portion of the site. The cannabis facility would be located outside any streams, riparian habitats, and water bodies under the jurisdiction of CDFW, as shown in Figure 3.4-1; however, the access road to the cannabis facility and the power line for the cannabis facility would cross Spring Canyon Creek and the ephemeral drainages. Any development activities within the stream could require a Lake and Streambed Alteration Agreement from CDFW if activities are proposed within CDFW-jurisdictional areas.

The on-site vegetation communities (Figure 3.4-1) indicate that no wetland vegetation is present in the project site. No wetlands were observed on site during the reconnaissance-level survey conducted for the project (Kokx, 2020). Therefore, no wetlands are on the project site.

#### **Special-Status Species**

During the database search, species were determined to have the potential to occur in the project site, if known or expected to occur in the project vicinity, and if the project site or immediate vicinity contains suitable habitat. Species whose known distribution, habitat, or elevation range precluded a possible occurrence in the project vicinity generally were not considered further. Some taxa with relatively low probability for occurrence were retained for further evaluation because of incomplete knowledge about the range and/or habitat of certain species. Focused surveys were conducted for the 14 special-status plant species with potential to

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occur in the project site, detailed in Table 3-3. No special-status plant species were observed during the focused botanical surveys (Panorama Environmental, Inc., 2020; Kokx, 2021) and special-status plants are presumed to be absent. Seven special-status wildlife species have a potential to occur on the site.

**Table 3-3 Special-Status Species with Potential to Occur in the Project Site**

| Species  | Rank/Status | Potential to Occur in the Project Site  |
|--|-------------|---|
| <b>Plants</b>  |             |   |
| <i>Ivesia kingii</i> var. <i>kingii</i><br>(alkali ivesia) | 2B.2        | <i>Absent.</i> Within Great Basin Scrub, meadows and seeps, playas/mesic, alkali. Observed at elevations from 1,200–2,130 meters.                                   |
| <i>Calochortus excavatus</i><br>(Inyo County star-tulip)   | 1B.1        | <i>Absent.</i> Chenopod scrub, meadows and seeps/alkaline and mesic. Observed at elevations from 1,150–200 meters. Known from small remnants of former populations. |
| <i>Crepis runcinata</i><br>(fiddleleaf hawksbeard)         | 2B.2        | <i>Absent.</i> Mojave Desert scrub, pinyon, and juniper woodland/mesic, alkaline. Observed at elevations from 1,250–1,450 meters.                                   |
| <i>Phacelia inyoensis</i><br>(Inyo phacelia)               | 1B.2        | <i>Absent.</i> Meadows and seeps (alkaline). Observed at elevations from 915–3,200 meters.  |
| <i>Micromonolepis pusilla</i><br>(dwarf monolepis)         | 2B.3        | <i>Absent.</i> Alkaline, openings in Great basin scrub. Observed at elevations from 1,500–2,400 meters.   |
| <i>Cryptantha fendleri</i><br>(sand dune cryptantha)       | 2B.2        | <i>Absent.</i> Sand dunes, sandy soils, and sagebrush scrub. Observed at elevations from 1,950–2,210 meters.  |
| <i>Plagiobothrys parishii</i><br>(Parish’s popcornflower)  | 1B.1        | <i>Absent.</i> Wet alkaline meadows around springs and emergent wetlands or lake beds Observed at elevations from 750–1,400 meters.                                 |
| <i>Viola purpurea</i> ssp. <i>aurea</i><br>(golden violet) | 2B.2        | <i>Absent.</i> Great basin scrub, pinyon, and juniper woodland. Observed at elevations from 1,000–1,800 meters.   |
| <i>Boechera dispar</i><br>(Pinyon rockcress)               | 2B.3        | <i>Absent.</i> Joshua tree woodland, pinyon, and juniper woodland. Mojave Desert scrub; granitic, and gravelly. Observed at elevations from 1,200–2,400 meters.     |
| <i>Cymopterus globosus</i><br>(globose cymopterus)         | 2B.2        | <i>Absent.</i> Great Basin scrub. Sandy, open flats. Observed at elevations from 1,215–2,090 meters. Last seen April 26, 1897.                                      |
| <i>Phacelia gymnoclada</i><br>(naked-stemmed phacelia)     | 2B.3        | <i>Absent.</i> Chenopod scrub, Great Basin scrub, pinyon, and juniper woodland. Gravelly or clay soils. Observed from 1,200–2,500 meters.                           |
| <i>Chaetadelpa wheeleri</i><br>(Wheeler’s dune broom)      | 2B.2        | <i>Absent.</i> Desert dunes, Great Basin scrub, Mojave Desert scrub; and sandy plains. Observed from 795–1,900 meters.  |

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| Species   | Rank/Status    | Potential to Occur in the Project Site   |
|---|----------------|--|
| <i>Orobanche ludoviciana</i> var. <i>Arenosa</i> (Suksdorf's broomrape)   | 2B.3           | <i>Absent.</i> Parasitic on <i>Ericameria</i> and <i>Iva</i> spp. Similar to <i>O. parishii</i> ssp. <i>parishii</i> ; separation between them blurred in Great Basin. Observed from 795–1,900 meters.   |
| <i>Sphaeromeria potentilliodes</i> (alkali tansy-sage)  | 2B.2           | <i>Absent.</i> Meadows and seeps. Playas, usually alkaline. Observed from 2,100–2,400 meters.  |
| <b>Wildlife</b>   |                |  |
| <i>Pyrgulopsis wongi</i> (Wong's springsnail)   | FSS            | <i>Low.</i> Great Basin flowing waters Meadow, seeps, and small to moderate-size spring-fed streams. Common in watercress and/or on small bits of travertine and stone.  |
| <i>Ovis Canadensis</i> ssp. <i>nelsoni</i> (desert bighorn sheep)   | BLMS, CFP, FSS | <i>Low.</i> Widely distributed from the White Mountains in Mono County. Open, rocky, steep areas with available water and herbaceous forage. Active year-round.  |
| <i>Buteo swainsonii</i> (Swainson's Hawk)   | BCC, BLMS      | <i>Low.</i> Great Basin grassland. Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Nests April through July.  |
| <i>Corynorhinus townsendii</i> (Townsend's big-eared bat)   | SSC            | <i>Low.</i> Roosts in the open, hanging from walls and ceilings. Breeds in mines and caves. Roosting sites limiting. Extremely sensitive to human disturbance.   |
| <i>Microtus californicus vallicola</i> (Owen's Valley vole)   | SSC, BLMS, FSS | <i>Low.</i> Found in wetlands and lush grassy ground in the Owens Valley. Needs friable soil for burrowing. Eats grasses, sedges, and herbs.   |
| <i>Lanius ludovicianus</i> (Loggerhead Shrike)  | SSC            | <i>Medium–High.</i> Found in grasslands and desert with scattered shrubs, nesting in large dense spiny shrubs and low trees.   |
| <i>Artemisiospiza belli</i> (Bell's sparrow)  | SSC            | <i>Low.</i> Outside of known range.  |
| <b>Listing:</b><br>BCC = USFW Bird of Conservation Concern<br>BLMS = BLM Sensitive<br>CFP = California Department of Fish and Wildlife Fully Protected Species<br>FSS = USFS Sensitive<br>SSC = California Department of Fish and Wildlife Species of Special Concern<br>WL = California Department of Fish and Wildlife Watch List |                | <b>California Rare Plant Ranks:</b><br>1B Plants Rare, Threatened, or Endangered in California and Elsewhere<br>2B Plants Rare, Threatened, or Endangered in California, but More Common Elsewhere<br>0.1 Seriously threatened in California<br>0.2 Moderately threatened in California<br>Not very threatened in California |

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- 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?**

#### **General Plan Amendment**

##### **Special-Status Plant Species**

The results of the focused botanical surveys indicated that no special-status plants are present in the project site. Future development and uses in the project site such as a residential dwelling unit and accessory dwelling unit under the General Plan Amendment would result in a less than significant impact on special-status plants because no special-status plants are known to occur on the site and the Specific Plan would allow for minor reduction in suitable habitat.

##### **Special-Status Wildlife Species**

One special-status bird species was found to have a medium to high potential to occur in the project site, as shown in Table 3-1. Nesting birds that are protected under State and federal law could use habitat in the project site. The permitted uses under the General Plan Amendment are similar to the existing Rural Residential land use designation. Development under the General Plan Amendment would not result in significant loss of habitat or impacts on special-status wildlife species. The impact of the General Plan Amendment would be less than significant.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

##### **Special-Status Plant Species**

No special-status plant species were identified during the reconnaissance survey and focused botanical surveys. The cannabis facility would result in a less than significant impact on special-status plant species.

##### **Special-Status Wildlife Species**

The project would involve heavy equipment use within habitat where a medium to high potential would exist for encountering loggerhead shrike and other migratory bird species, protected under State and federal law, including California Fish and Game Code 3503 and the Migratory Bird Treaty Act (MBTA), which make it illegal to take or destroy a nest without a valid permit. Equipment use and earth-disturbing activities could result in nest destruction or mortality of young during the nesting season when an active nest is present. Use of heavy equipment could cause nest abandonment, if construction occurs near an active nest during the nesting season. Loss of an active nest, whether directly through vegetation removal or indirectly because of adjacent noise and activity, would be a significant impact. Mitigation Measure BIO-1 would require nesting bird surveys for construction activities that occur during the breeding season (February 15 through August 31). The impact on nesting birds and loggerhead shrike would be less than significant with mitigation incorporated.

**Mitigation:** Implement Mitigation Measure BIO-1

#### **Mitigation Measure BIO-1: Nesting Bird Surveys**

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A preconstruction survey shall be performed prior to construction. The following measures shall be implemented:

- Use of heavy equipment, grading, demolition, construction, and/or tree removal, shall avoid the nesting season to the greatest extent feasible.
- If use of heavy equipment, grading, demolition, construction, and/or tree removal are scheduled to occur during the nonbreeding season (September 1 through February 15), no measures are required.
- If construction activities occur during the nesting season, a pre-construction survey for active bird nests in the project site shall be conducted on the project site and within 500 feet of the project site by a qualified biologist approved by the County
  - If no nesting or breeding behavior is observed, construction may proceed.
  - If an active nest is detected, ~~a determination shall be made by a qualified biologist as to whether construction work could affect the active nest. If it is determined that construction would not affect an active nest, work may proceed. If it is determined that construction activities are likely to impair the successful rearing of the young,~~ a 'no-disturbance buffer' in the form of orange mesh Environmentally Sensitive Area (ESA) fencing shall be established around occupied nests to prevent destruction of the nest and to prevent disruption of breeding or rearing behavior. The extent of the 'no-disturbance buffer' shall be no less than 300 feet (500 feet for raptors), a smaller buffer may be determined by a qualified biologist ~~in consultation with CDFW~~. 'No-disturbance buffers' shall be maintained until the end of the breeding season or until a qualified wildlife biologist has determined that the nestlings have fledged. A qualified wildlife biologist shall inspect the active nest to determine whether construction activities are disturbing to the nesting birds or nestlings. If the qualified wildlife biologist determines that construction activities pose a disturbance to nesting, construction work shall be stopped in the area of the nest, and the 'no-disturbance buffer' expanded.

- 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 US Fish and Wildlife Service?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

A small population of Greasewood Scrub in alliance with *Suaeda nigra* was observed on the project site during focused botanical surveys. This population was in an area with high saline content, not suitable for agricultural use (Kokx, pers. Comm., 2021). If future development

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under the General Plan Amendment to Specific Plan, such as construction of a residence or accessory dwelling unit, occurred within the Greasewood Scrub habitat area, the impact on sensitive natural communities would be significant. Mitigation Measure BIO-2 specifies that future development under the General Plan Amendment and Specific Plan would avoid sensitive natural communities and riparian areas including the Greasewood Scrub. The impact on a sensitive natural community would be less than significant with mitigation.

**Mitigation:** Implement Mitigation Measure BIO-2

#### **Mitigation Measure BIO-2: Prohibited Development in Sensitive Habitats**

Future development under the Specific Plan would be prohibited within any streams, riparian habitats, or sensitive natural communities. No future development would occur in the Greasewood Scrub and Rubber Rabbit Brush Scrub habitat (see Figure 3-5.1 to protect sensitive natural communities and special-status species.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

##### **Sensitive Natural Communities**

No sensitive natural communities occur within the areas proposed for the cannabis facility development. The cannabis facility would not impact sensitive natural communities.

##### **Riparian Habitat**

The cannabis facility would require upgrades to the existing access road that crosses Spring Canyon Creek, which provides riparian habitat. Power distribution to the project site would be via overhead powerlines and would be implemented upon approval of the Specific Plan. A Lake or Streambed Alteration Agreement from CDFW would be required for any grading, trenching, or other discharge within Spring Canyon Creek. The access road improvements to meet County standards for ingress and egress could result in impacts on riparian habitat because of the access road. Road construction within riparian habitat and subsequent loss of habitat would be a significant impact. Mitigation Measure BIO-3 requires compensation mitigation for any permanent impacts on riparian habitat. Impacts on riparian habitat would be less than significant with mitigation. In addition, Section 1600 of Fish and Game Code requires a Lake or Streambed Alteration Agreement prior to discharge of material to lake or streambed, including riparian areas.

**Mitigation:** Implement Mitigation Measure BIO-3

#### **Mitigation Measure BIO-3: Mitigation for Riparian Habitat and/or Fish and Game Code Section 1602 Resources.**

If construction activities impact riparian habitat and/or Fish and Game Code Section 1602 resources, the permanent loss of riparian habitat and/or Fish and Game Code Section 1602 resources shall be compensated through either on-site restoration, purchase of mitigation bank credits from a CDFW approved mitigation bank, and/or land acquisition, management and conservation in perpetuity and funding thereof.

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~~enhancement or establishment of riparian habitat.~~ Permanent impacts to riparian habitat shall be compensated at a ratio, determined by CDFW, commensurate with the quality of habitat impacted and habitat created and the type of mitigation provided through enhancement of riparian areas at a minimum 2:1 ratio (enhancement:impact) or creation of riparian areas at a minimum 1:1 ratio. All areas of temporary impact will be restored to preconstruction contours and habitat conditions. The applicant will prepare a habitat mitigation plan that includes:

- Baseline conditions within the mitigation site
- Proposed mitigation site conditions
- Mitigation methods (e.g., habitat creation or enhancement)
- Performance standards/success criteria including a minimum of 70% vegetated cover with native riparian vegetation that are the target of the creation and enhancement efforts and less than 3% invasive species cover
- Habitat maintenance including trash removal, invasive weed removal, and repair of any damage to the mitigation site
- Monitoring requirements including annual monitoring during the establishment period. The annual monitoring will include surveys for native vegetation cover, photo documentation at defined photo-monitoring locations, and monitoring for invasive species and any other habitat stressors. Monitoring will be conducted for the first five years or until success criteria are met.

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

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

No wetlands occur in any portion of the project site. Development under the Specific Plan and the cannabis facility would avoid impacts on state or federally protected wetlands because no wetlands occur within the site. No impact would occur.

- 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?**

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for development of a residential dwelling unit and an accessory dwelling unit as well as composting. Development of the minimal structures allowed under the Specific Plan would not interfere with a movement corridor. There are no native wildlife nursery sites on the project site that would be affected by the General Plan Amendment. The impact would be less than significant.

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#### **Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The project site is in a valley with low density development, surrounded by more natural, less developed hills. The project site does not serve as an important migratory corridor for wildlife and plants. The existing perimeter fencing around the property precludes some wildlife from traveling through the site. The proposed fencing around the cultivation area would not appreciably affect movement of wildlife through the project site. Movement of small wildlife, such as lizards and rodents, through the site generally would be unaffected by development. Wildlife still would be able to travel through the broader region. The impact on wildlife movement would be less than significant. See Impact a) for a discussion of impacts on nesting birds.

- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

No local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would apply to the project (Mono County 2015). No impact would occur.

- 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?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The project site is not within an area covered by an adopted habitat conservation plan or natural community conservation plan (Mono County 2015). No impact would occur.

### 3.6 Cultural Resources

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| <b>5. CULTURAL RESOURCES. Would the project:</b>   |                                |  |                                     |                          |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?      | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of formal cemeteries?                           | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### **Records Search and Cultural Resource Assessment**



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A cultural resources records search was conducted for the project site at the Eastern Information Center (EIC), at the University of California, Riverside. The search was in a 1-mile radius around the boundaries of project site and collected all available information about previous cultural resources studies and known archaeological sites/isolated finds in the area.

The EIC search identified six previous cultural resources studies (Table 3-4) and 13 known cultural resources within the 1-mile radius (Table 3-6), while additional research identified four other cultural resources studies (Table 3-7). Eleven of the cultural resources are archaeological sites, nine of which are in the project site (Table 3-8). The other two resources are isolated artifacts (Great Basin Consulting Group, 2020). Nine of the identified cultural resources are within the two project parcels, but none of the resources are in the cannabis facility site.

**Table 3-4 EIC Search Results of Cultural Studies within 1-Mile of the Project Site**

| EIC Report No. | Title  | Author and Year | Resources in Search Area                 |
|----------------|--|-----------------|--|
| MN-00287       | A Cultural Resource Reconnaissance of the Montgomery Creek Hydroelectric Project, Mono County, California  | Crist 1982      | None                                     |
| MN-00327       | An Intensive Archaeological Survey of a Proposed 115 KV Transmission Line, Dixie Valley, Nevada to Bishop, California  | Stornetta 1984  | 26-3787, 26-3789, 26-3792                |
| MN-00716       | Archaeological Evaluations for the Benton Land Exchange, Mono County, California: Cultural Resource Inventory and Subsurface Testing Report  | Halford 1997    | 26-3149, 26-3150, 26-3151, 26-3153       |
| MN-00841       | Historic Property Survey Report, Benton Rehabilitation Project   | Mills 2000      | 26-894, 26-895, 26-896, 26-3931, 26-3932 |
| MN-00871       | Cultural Resources Inventory Report: Blind Springs Hill Monitor Project  | Holt 2006       | None                                     |
| MN-001065      | Archaeological Survey Report for the Southern California Edison Company's Proposed Replacement of one Pole Structure on the Sagehen 12KV Distribution Circuit, Grid Reliability Maintenance Project (TD512817), near Benton, Mono County, California | Switalksi 2011  | None                                     |

*Source: (Great Basin Consulting Group, LLC, 2020)*

**Table 3-5 Previously Identified Cultural Resources within 1-Mile of the Project Site**

| Site Number(s)      | Era <sup>a</sup> | Description  | Report(s) and Year(s)                                       |
|---------------------|------------------|--|---|
| 26-894 (CA-MNO-894) | P                | Basic Habitation – flaked stone and ground stone tools, debitage | Stornetta 1980; Basgall and Richman 1998; Giambastiani 1998 |

### 3 ENVIRONMENTAL IMPACT CHECKLIST

| Site Number(s)         | Era <sup>a</sup> | Description  | Report(s) and Year(s)                    |
|------------------------|------------------|--|--|
| 26-895 (CA-MNO-895)    | P                | Complex Lithic Scatter – flaked stone tools and debitage         | Stornetta 1980; Basgall and Richman 1998 |
| 26-896 (CA-MNO-896)    | P                | Basic Habitation – flaked stone and ground stone tools, debitage | Stornetta 1980; Basgall and Richman 1998 |
| 26-897 (CA-MNO-897)    | P                | Complex Lithic Scatter – flaked stone tools and debitage         | Stornetta 1980                           |
| 26-3149 (CA-MNO-3094)  | P                | Complex Lithic Scatter – flaked stone tools and debitage         | Halford 1997                             |
| 26-3150 (CA-MNO-3095)  | P                | Complex Lithic Scatter – flaked stone tools and debitage         | Halford 1997                             |
| 26-3151 (CA-MNO-3096)  | P                | Complex Lithic Scatter – flaked stone tools and debitage         | Halford 1997                             |
| 26-3153 (CA-MNO-3098H) | H                | Prospects  | Halford 1997                             |
| 26-3787                | H                | Comanche Mill Site   | Stornetta 1984                           |
| 26-3789                | H                | Stone Foundations  | Stornetta 1984                           |
| 26-3792                | P                | Simple Lithic Scatter – debitage only                            | Stornetta 1984                           |
| 26-3931                | P                | Isolate – projectile point medial (untypable)                    | Proctor 1980                             |
| 26-3932                | P                | Isolate – handstone end fragment                                 | Proctor 1980                             |

Note:

e P = Prehistoric, H = Historic

Source: (Great Basin Consulting Group, LLC, 2020)

**Table 3-6 Additional Search Results for Previous Cultural Resources Studies within 1-Mile of the Project Site**

| Title   | Author and Year          | Resources in Search Area                         |
|---|--------------------------|--|
| Archaeological Survey Report of a Proposed Highway Improvement Project on 09-MNO-6, P.M.18.2/26.4, Mono County, California  | Proctor 1980             | 26-894, 26-895, 26-896, 26-897, 26-3931, 26-3932 |
| Transportation Enhancement Activities Project: Archaeological Roadside Inventory Report, Inyo and Mono Counties, California | Basgall and Richman 1998 | 26-894, 26-895, 26-896, 26-897                   |
| Phase II Evaluation of Archaeological Site CA-MNO-894 near Benton, Mono County, California                                  | Giambastiani 1998        | 26-894   |
| Cultural Resources Inventory of Caltrans District 9 Rural Conventional Highways in Inyo and Mono Counties                   | Leach-Palm et al. 2010   | 26-896   |

Source: (Great Basin Consulting Group, LLC, 2020)

### 3 ENVIRONMENTAL IMPACT CHECKLIST

#### Project Site

None of the previously recorded cultural resources are located in the project site; however, previous cultural resource studies were not focused on the project site. The project vicinity contains a high volume of sensitive prehistoric and historic resources. The former alignment of the Southern Pacific (SP) Railroad and Carson & Colorado (C&C) Railroad once ran north/south through the project site. Although a siding or station was never in the project vicinity, the remains of temporary railroad worker’s camps possibly occur in the project site.

The records search identified that the original road through Hammil and Chalfant valleys ran through the eastern edge of the project site. Also, many unimproved dirt roads are in the project site, some of which are shown in the 1962 Benton, California 15-minute quadrangle, and therefore would appear to be of historic age, likely dating prior to 1960. These roads could have been created and used for many different purposes during historic times, perhaps residential, recreational, or industrial. The roads are associated with operation of the historic Comanche Mine and Mill, the remains of which are immediately south/southwest of the project site, within the records search radius. The Comanche Mine was located in 1862, becoming a major part of the Blind Springs Hill mining district on its organization in 1864 (Great Basin Consulting Group 2020b).

#### Archaeological Survey

A pedestrian survey was conducted for the project by Great Basin Consulting Group in July and August 2020. The results of the survey confirmed that the nine archaeological sites that were identified during the records search are in the project site. Four of the nine archaeological sites are eligible or potentially eligible for listing in the California Register of Historical Resources (CRHR) based on the criteria for designation provided in Section 3.19).

**Table 3-7 Archaeological Sites Identified and Documented in the Project Site**

| Field No. | Age <sup>a</sup> | Resource Description  | Resource Attribute | Recommended CRHR Status |
|-----------|------------------|---|--------------------|-------------------------|
| TS-1      | H                | Well and nearby remnant waterline pipe  | AH5                | Not Eligible            |
| TS-2      | P                | Large lithic scatter with 18 tools; contracting-stem point, bifaces, flake tools, and groundstone | AP2                | Potentially Eligible    |
| TS-3      | P                | Lithic scatter with one biface, one piece of groundstone, and one upright pocket-tobacco tins     | AP2                | Potentially Eligible    |
| TS-4      | H                | Road along the lower alluvial fan   | AH7                | Not Eligible            |
| TS-5      | P                | Lithic scatter with Desert Side-Notched projectile point and one piece of groundstone             | AP2                | Potentially Eligible    |

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| Field No. | Age <sup>a</sup> | Resource Description  | Resource Attribute | Recommended CRHR Status |
|-----------|------------------|---|--------------------|-------------------------|
| TS-6      | H                | Road network connecting with location of TS-8 and Comanche Mine's Ross Tunnel | AH7                | Not Eligible            |
| TS-7      | H                | Trash dump/scatter  | AH4                | Eligible                |
| TS-8      | H                | Beam structure—mining-related   | AH9                | Not Eligible            |
| TS-9      | p                | Small lithic scatter  | AP2                | Not Eligible            |

Notes:

f P = Prehistoric, H = Historic

Source: (Great Basin Consulting Group, 2021)

#### Native American Consultation

Mono County conducted Native American consultation for the project, consistent with SB 18 and AB 52, to identify potential concerns or issues associated with Native American cultural resources in the project site. The County mailed consultation letters to potentially interested Native American groups in June 2020, May 2021, and February 2022. No consultation requests were received by the County. Table 3-6 summarizes the Native American consultation effort. All correspondence related to Native American consultation is provided in Appendix D.

**Table 3-8 Native American Consultation for the Project**

| Contact                      | Tribe                                     | Letter Date            | Response to Notification |
|------------------------------|---|------------------------|--------------------------|
| <b>SB 18</b>                 |   |                        |                          |
| Billie Saulque               | Benton Paiute Reservation                 | June 2020              | No Response              |
| Bill Helmer                  | Big Pine Band of Owens Valley THOP        | June 2020              | No Response              |
| Jacqueline Danelle Gutierrez | Big Pine Paiute Tribe of the Owens Valley | June 2020 & March 2022 | No Response              |
| Genevieve Jones              | Big Pine Paiute Tribe of the Owens Valley | June 2020              | No Response              |
| Raymond Andrews              | Bishop Paiute Tribe                       | June 2020              | No Response              |
| Mervin Hess                  | Bishop Paiute Tribe                       | June 2020              | No Response              |
| Gerald Howard                | Bishop Paiute Tribe                       | June 2020              | No Response              |
| John L. Glazier              | Bridgeport Indian Colony                  | June 2020 & March 2022 | No Response              |
| Robert Robinson              | Kern Valley Indian Council                | June 2020              | No Response              |
| Melanie McFalls              | Walker River Paiute Tribe                 | June 2020 & March 2022 | No Response              |

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| Contact          | Tribe                                     | Letter Date              | Response to Notification |
|------------------|---|--------------------------|--------------------------|
| Darrell Kizer    | Washoe Tribe of Nevada and California     | June 2020                | No Response              |
| Neil Mortimer    | Washoe Tribe of Nevada and California     | June 2020                | No Response              |
| Sally Manning    | Big Pine Paiute Tribe of the Owens Valley | May 2021 & March 2022    | No Response              |
| James Rambeau    | Big Pine Paiute Tribe of the Owens Valley | May 2021 & March 2022    | No Response              |
| Allen Summers    | Bishop Paiute Tribe                       | May 2021 & March 2022    | No Response              |
| Charlotte Lange  | Mono Lake Kutzadika Tribe                 | May 2021 & March 2022    | No Response              |
| Tina Braitewaite | Benton Paiute Reservation                 | March 2022               | No Response              |
| Kenneth Woodrow  | Wuksache Indian Tribe/Eshom Valley Band   | March 2022               | No Response              |
| <b>AB 52</b>     |   |                          |                          |
| Charlotte Lange  | Kutzadika Tribe                           | May 2021 & February 2022 | No Response              |

**a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

No historic era cultural resources were previously recorded within the project parcels based on records at the Eastern Information Center. The intensive pedestrian survey of the project parcels identified five historic period resources on site. One historic era resource within the southern parcel is eligible for listing on the CRHR (TS-7) (Great Basin Consulting Group, 2021).

**General Plan Amendment**

Future development under the General Plan Amendment to Specific Plan could result in impacts on significant cultural resources if the development were to occur in areas containing resources. To avoid significant impacts on cultural resources, Mitigation Measure CUL-1 identifies procedures to preserve resources in place and/or relocate resources at the request of a historical society. The mitigation measures specify procedures to avoid historic resources in perpetuity and would be binding on any future landowner under the Specific Plan, thereby avoiding significant effects. The impact would be less than significant with mitigation.

**Mitigation:** Implement Mitigation Measure CUL-1.

**Mitigation Measure CUL-1: Cultural Resources Preservation and Treatment**

Exclusion fencing shall be established and maintained around any eligible and potentially eligible cultural resources including a 100-foot buffer from the outer limits of

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any known surface deposits. The fencing shall be comprised of dark, non-reflective material intended for permanent use such as galvanized hog wire and shall be a minimum of 4 feet tall to ensure visibility and minimize unauthorized access. Signs stating “Environmentally Sensitive Area, Do Not Enter, Contact Mono County (760-924-1800) With Any Questions” shall be posted around the exclusion zone for avoidance. The exclusion zone avoidance fence and signs shall be maintained in perpetuity by current and future property owner(s). Alternatively, removal of the identified resource(s) may occur at the request of a Native American tribe for pre-historic resources or historical society for historic-era resources. The removed resources may be reburied at a location selected by the tribe or historical society at their request.

If preservation-in-place and reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to the materials and confer with the tribe for pre-historic resources or historical society for historic-era resources to identify an American Association of Museums-accredited facility that can accept the materials into its permanent collections and provide proper care, in accordance with the 1993 California Curation Guidelines. A curation agreement with an appropriately qualified repository shall be developed between the landowner and museum that legally and physically transfers the materials and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the materials and associated records and the obligation of the project applicant to pay those fees.

#### **Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The proposed cannabis facility would involve grading and earth disturbance within the northern parcel only. No ground disturbance is proposed in proximity to the historic potentially-eligibly historic era resources (TS-7). Construction and operation of the cannabis facility would not affect any defining feature of the eligible resource. Therefore, the proposed cannabis use would have no effect on any historic resource.

- b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**

#### **General Plan Amendment**

Future development under the General Plan Amendment to Specific Plan could result in impacts on significant cultural resources if the development were to occur in areas containing eligible archaeological resources. To avoid significant impacts on cultural resources, Mitigation Measure CUL-1 identifies procedures to preserve resources in place and/or relocate resources at the request of a tribe or historical society. The mitigation measures specify procedures to avoid cultural resources in perpetuity and would be binding on any future landowner under the Specific Plan. Therefore, the impact on archaeological resources would be less than significant with mitigation.

#### **Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

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#### **Impact on Known Archaeological Resources**

Background research identified four pre-historic archaeological sites within the two project parcels. Three of the four prehistoric archaeological sites are eligible for listing in the CRHR. Constructing the overhead powerline associated with the cannabis facility would be adjacent to one of the identified archaeological sites (TS-5). Construction of the overhead powerline would be expected to span and avoid the site; however, the power pole installation and heavy equipment and trucks could damage the resource if the poles were installed in an area containing significant cultural resources. Damage to this archaeological resource would result in a significant impact. Mitigation Measure CUL-2 requires a cultural resources specialist to be present during construction of the overhead power poles to monitor ground-disturbing activities for the presence of cultural resources. If any known or suspected cultural resources are found during construction, the resources would be evaluated and protected in place or treated in accordance with Mitigation Measure CUL-3. With mitigation, the resource would be avoided during construction and the impact would be reduced to less than significant.

#### **Previously Undiscovered Resources**

Grading and installation of the leach field and cannabis facility would disturb soils on site, and these activities would have the potential to result in discovery of unknown and unanticipated buried archaeological and historical resources during site preparation and construction activities. Any discovery of such resources that occurs during grading and excavation would result in a cessation of work in the area and would be treated in accordance with federal, State, and local regulations, including those outlined in State CEQA Guidelines Section 15064.5 regarding the process for evaluating historic resources as described in Mitigation Measure CUL-3. Construction of the cannabis facility would result in a less than significant impact on previously undiscovered historical or archaeological resources with implementation of mitigation.

**Mitigation:** Implement Mitigation Measures CUL-1, CUL-2, and CUL-3.

#### **Mitigation Measure CUL-2: Cultural Resource Monitoring**

A qualified archaeologist approved by the County shall be on-site to monitor all ground disturbing construction activities within 50 feet of any known cultural resource. If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt, the County shall be notified, and the discovery shall be evaluated in accordance with the requirements of Mitigation Measure CUL-3.

#### **Mitigation Measure CUL-3: Inadvertent Discovery of Archaeological Resources**

If evidence of any subsurface archaeological features or deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity in the area of the discovery shall be halted within 50 feet of the find, and the finds shall be protected until they are examined by a qualified archaeologist approved by the County. Finds may include but are not limited to:

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- Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; stone-milling equipment (e.g., mortars, pestles, handstones, milling slabs); and battered stone tools, such as hammerstones and pitted stones.
- Historic-era materials might include building or structure footings and walls and deposits of metal, glass, and/or ceramic refuse.

A qualified archaeologist who meets the U.S. Secretary of the Interiors professional qualifications in archaeology and is approved by the County shall be retained to assess the significance of the find and make recommendations for further evaluation and treatment as necessary. A Native American representative from a traditionally and culturally affiliated tribe will be notified and invited to assess the find if the artifacts are of Native American ancestry and determined to be more than an isolated find. If, after evaluation, a resource is considered a historical resource or unique archaeological resource (as defined in CEQA Guidelines Section 15064.5), or a tribal cultural resource (as defined in PRC Section 21074), all preservation options shall be considered as required by CEQA (see CEQA Guidelines Section 15126.4 and PRC 21084.3), including possible capping, data recovery, mapping, or avoidance of the resource. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work in the area may resume upon completion of treatment. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public except for information deemed confidential and protected under state law.

**c) Would the project disturb any human remains, including those interred outside of formal cemeteries?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

No known cemeteries or human remains are in the project site. If any human remains are uncovered, all project activities would be required to comply with State policies. All site disturbance would halt until the County Coroner could make a determination as to the status of the human remains (Health and Safety Code 7050.5–7055). If the human remains may be those of a Native American, the Native American Heritage Commission would be contacted, and the appropriate treatment would be identified for the remains (Health and Safety Code 7050.5[b]; Public Resources Code Section 5097.98). Compliance with the appropriate regulations would ensure that any human remains would not be damaged by project activities. The impact would be less than significant.



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## 3.7 Energy

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <b>6. ENERGY. Would the project:</b>  |                                |  |                                     |                          |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Construction of the cannabis facility and future structures in the project site developed under the Specific Plan would require energy to produce the raw building materials, in addition to powering construction equipment and vehicles. Fuel and energy to be used during construction would be consistent with typical construction and manufacturing practices and would not be an excessive or wasteful use of energy. Because use of fuel would also result in increased cost, it would generally be uneconomical to use inefficient and wasteful construction practices.

During operation of the cannabis facility, the indoor cultivation facility would require the use of special lighting, ventilation, and air conditioning systems. Although the cannabis facility and some allowable uses may involve substantial energy use, production of commodities would be beneficial to the California economy and outweigh the quantity of energy consumed. Fuel use during operation of the cannabis facility or future uses would be consistent with commercial cannabis and manufacturing practices. In addition, the project will obtain power from Southern California Edison (SCE). SCE is required to meet the State Renewable Portfolio Standards (RPS) goals, which include procurement of 60 percent renewable energy by 2030 and 100 percent renewable energy by 2050. Project lighting would consist of LED lights for the greenhouses, and outside the processing facility and cultivation premise to minimize power usage. Evaporative cooling walls would be installed in the greenhouses to limit air conditioning usage, and trip generation from personnel and cannabis distribution would be minimal. All development in the County would be required to comply with the energy performance standards under Title 24, Part 11 of the California Green (Cal Green) Building Standards Code as well as policies and actions contained in the Resources Efficiency Plan to address energy conservation (Mono County 2014). The project applicant and future operators in the project site also would have financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during operation. The impact would be less than significant.

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- b) **Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Future development under the Specific Plan and the cannabis facility would obtain power from SCE, which is required to meet California’s renewable energy goals and polices. The project also would be required to comply with the California Green Building Standards Code, policies and actions set forth in the Resources Efficiency Plan. The project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The impact would be less than significant.

### 3.8 Geology and Soils

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>7. GEOLOGY AND SOILS. Would the project:</b>  |                                |  |                                     |                                     |
| a) Directly or indirectly cause 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. | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| iv) Landslides?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 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?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

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| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- a) Would the project directly or indirectly cause 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.**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site is not within an earthquake fault zone as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map (CDC, 2019). The nearest earthquake fault zone is approximately 2.5 miles east of the project site. No known faults intersect the project site. Fault rupture would not occur on the project site. No impact would occur.

- ii. Strong seismic ground shaking?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

As discussed above, the project site is in proximity to an earthquake fault zone. The presence of project structures developed under the General Plan Amendment, Specific Plan, Use Permit and Operation Permit would not cause strong seismic shaking or cause substantial adverse risks as a result of strong seismic ground shaking and no impact would occur. Future occupants of the project site, including project personnel and residents, could be subject to strong seismic shaking because of the proximity to faults. However, this would be an impact of the environment on the project rather than an impact of the project on the environment. The County has no reason to believe that the project would increase geologic risk to adjacent properties. Therefore, the project would not have any environmental impact with respect to strong seismic ground shaking. Regardless, the cannabis facility would be designed to meet current California seismic structure codes. These structures and all future development under the Specific Plan would be built in compliance with the seismic requirements in the California Building Code (County of Mono, 2015). Compliance with the California Building Code and the County Building Code could prevent major damage to structures. The project would comply with these codes and would implement standard engineering techniques to ensure structural safety. These standards are intended to reduce seismic hazards to a level of “acceptable risk,” so

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that the potential for significant human and property losses would be outweighed by the benefits, based on the probability of occurrence.

#### iii. Seismic-related ground failure, including liquefaction?

##### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The susceptibility of a soil to liquefaction is a function of the type of soil, depth, density, and water content of the granular sediments and the magnitude of earthquakes likely to affect the area. Saturated, loose, granular sediments within the upper 50 feet are most susceptible to liquefaction. The potential for liquefaction increases with shallower groundwater (Caltrans, 2014). The project site is on the eastern edge of the Owens Valley groundwater basin. Little data is available on groundwater elevations in the project vicinity. The Tri Valley Groundwater Management District (TVGMD) has conducted monitoring of groundwater elevations in the Owens Valley groundwater basin in the County in the past. The TVGMD is currently working to identify alternative means for groundwater monitoring within the Valley. Groundwater elevations in the groundwater basin range from approximately 78 to 128 feet below ground surface (DWR, 2020) and the on-site well has a water level of 54 feet and pumping level at 56 feet (Maranatha Drilling & Pump Service, 2018), which would be below a range that would be at high risk for liquefaction. Construction and operation of project structures under the General Plan Amendment and Cannabis Use would not increase the risk of liquefaction in the project area or vicinity and would not create a risk of loss, injury, or death from liquefaction; no liquefaction impact would occur. In addition, the project structures and future development would be designed to comply with engineering and construction requirements in accordance with the California Building Code and Mono County Building Code. The impact would be less than significant.

#### iv. Landslides?

##### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The topography of the project site and vicinity is relatively flat. Therefore, the construction and operation of the project will not cause or increase any risk due to landslides. No impact would occur.

#### b) Would the project result in substantial soil erosion or the loss of topsoil?

##### **Overview**

Soils underlying the project site are primarily Hessica fine sandy loam, Rovana gravelly loamy coarse sand, and Ulymeyer-Rovana complex. The runoff hazard is very low for both soil units. The soils on the project site have a moderate wind erosion hazard risk and a slight water erosion hazard risk (USDA, 2019).

### 3 ENVIRONMENTAL IMPACT CHECKLIST

#### **General Plan Amendment**

The permitted uses under the General Plan Amendment to Specific Plan allow for minimal grading and topsoil disturbance. The impact on soil erosion or loss of topsoil from the Specific Plan permitted uses would be less than significant.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Construction of the cannabis facility would involve grading and earthmoving activities, which would expose bare soil, resulting in soil erosion. The project would involve up to 1.33 acres of surface disturbance over the entire construction period, which would exceed the 1-acre limit and necessitate compliance with the NPDES Construction General Permit. Soil erosion and topsoil loss would be minimized with implementation of the SWPPP and required BMPs, by such methods as installation of straw wattles, silt fencing, watering for dust control, and covering exposed surfaces. Operational activities would not involve earth-disturbing activities that could result in erosion. With implementation of erosion control measures in compliance with the regulatory requirements of the NPDES Construction General Permit, the impact would be less than significant.

- c) **Would the project 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?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The topography of the project site is flat and not susceptible to landslide hazards. As described above, liquefaction is not expected to be a risk in the project site because of the depth-to-groundwater in the basin. Construction vehicles and equipment that would be used for project construction would not result in instability of the soils in the project area. The proposed structures and any future development would be designed in accordance with current California seismic structure codes. Construction of the proposed structures would not result in increased instability. The project would not affect the stability of the soils in the area. The impact would be less than significant.

- d) **Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Expansive soils generally are soils with a high percentage of clay. Soils in the project site are primarily loamy sand and do not exhibit highly expansive behavior. Therefore, the impact would be less than significant. In addition, the cannabis facility and future developments would be constructed in accordance with the California Building Code and Mono County Building Code, which include requirements for construction on expansive soils that are intended to mitigate the risk of loss.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

- e) **Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

A septic system would be installed for the cannabis facility. Future development under the Specific Plan may involve installation of new or larger septic systems. All septic system installations are required to adhere to the prohibitions established in the Water Quality Control Plan for the Lahontan Region (LRWQCB 1995), which are intended to lessen or avoid the impact identified here. The septic system design would be subject to permitting by the Mono County Environmental Health Department, and if the septic system cannot be designed in compliance with applicable requirements, then it will not be permitted. As a result, the impact would be less than significant.

- f) **Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**General Plan Amendment Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

No paleontological resources or unique geologic features have been identified or reported in the project site. The project area is underlain by valley fill and has a low potential to contain paleontological resources (Inyo County Water Department, 2016). Construction of the cannabis facility and future developments would involve earth-disturbing and excavation activities. These activities would not extend beyond a few feet below ground surface, and therefore would not reach bedrock, where paleontological resources would be most likely to be uncovered. Construction and operation of the cannabis facility and future developments would be unlikely to uncover and damage any unique paleontological resources. The impact would be less than significant.

### 3.9 Greenhouse Gas Emissions

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| <b>8. GREENHOUSE GAS EMISSIONS. Would the project:</b>   |                                |  |                                     |                          |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### 3 ENVIRONMENTAL IMPACT CHECKLIST

- a) **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

#### **General Plan Amendment**

The permitted uses allowed under the General Plan Amendment to Specific Plan are similar to the permitted uses allowed under the existing Rural Residential land use and zoning.

Construction and operation of a residence and accessory dwelling unit would require less energy and generate less GHG than the cannabis use described above. As indicated in Table 3-10, the project GHG emissions are well below the significance threshold for GHG and the minor additional GHG emissions from a single residence and accessory dwelling unit would not cause the project to exceed the annual emissions threshold. The impact from GHG emissions from the General Plan Amendment to Specific Plan would therefore be less than significant.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Project construction activities in 2022 would generate GHG emissions from use of equipment and vehicles. The construction and operation emissions were calculated using CalEEMod version 2020.4.0. The detailed model emissions calculations are provided in Appendix B. The GBUAPCD and Mono County have not established quantitative thresholds for determining the significance of project GHG emissions from construction activities and project operations. Based on guidance from the GBUAPCD, project-related emissions were quantified and compared to numerical thresholds developed by the California Air Pollution Control Officers Association (CAPCOA). In the absence of promulgated thresholds by the GBUAPCD and Mono County, the most conservative numerical threshold suggested by CAPCOA, 900 MT CO<sub>2</sub>e per year, has been used as the threshold of significance for the project.

Construction activities would generate GHG emissions from truck and vehicle trips as well as equipment use. Vehicle trips, the emergency generator, and other sources would create GHG emissions throughout project operation. Additional sources of GHG emissions would include those from use of energy provided by the regional energy utility provider, Southern California Edison. The total GHG emissions generated by the cannabis facility in any year would not exceed the significance threshold as shown in Table 3-10. The impact would be less than significant. In addition, the project would need to comply with CCR Title 4 §16305.

**Table 3-9 Estimated Cannabis Facility-Related Greenhouse Gas Emissions**

| Source  | Emissions (MT CO <sub>2</sub> e) |
|---|----------------------------------|
| Construction Emissions                            | 255                              |
| Amortized Construction Emissions (30-year period) | 8.5                              |
| Operational Emissions                             | 36                               |
| <b>Total</b>                                      | <b>44.5</b>                      |
| Annual Emissions Threshold                        | 900                              |
| <b>Threshold Exceeded?</b>                        | <b>No</b>                        |

### 3 ENVIRONMENTAL IMPACT CHECKLIST

- b) **Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The County prepared the Resource Efficiency Plan in 2014, which outlines strategies to reduce GHG emissions and increase resource efficiency and is currently being updated resulting in a more sustainable community (Mono County, 2014). The Resource Efficiency Plan includes a GHG emissions inventory for Mono County and proposes actions to help the State achieve GHG reduction targets. The actions identified in the plan for the County to encourage and support energy efficiency and green building techniques do not require future developments to incorporate any specific GHG-reduction measures. The update to the plan recalculates the GHG emissions inventory and target and provides a GHG streamlining checklist under CEQA Section 15183.5, but does not modify any policies or regulations. No conflict with local regulations or plans would occur.

CARB prepared the Mobile Source Strategy, which addresses the current and proposed programs for reducing all mobile-source emissions, including GHG emissions. The Mobile Source Strategy identifies programs the State and federal government currently have or will adopt, which further the goals of the 2017 Scoping Plan. The vehicles used during construction and operation of the cannabis facility and Specific Plan would be required to comply with the applicable GHG reduction programs for mobile sources to achieve the State’s GHG reduction targets, in accordance with the 2017 Scoping Plan. Any construction contractor who owns the equipment and vehicles would be required to provide verification of compliance to CARB and USEPA under State and federal law. The project would conform with the relevant programs and recommended actions detailed in the 2017 Scoping Plan and Mobile Source Strategy. Therefore, the project would not conflict with state regulations or plans adopted to reduce GHG emissions. The impact would be less than significant.

### 3.10 Hazards and Hazardous Materials

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <b>9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>   |                                |  |                                     |                          |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |



### 3 ENVIRONMENTAL IMPACT CHECKLIST

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for a residential dwelling unit, accessory dwelling unit, home occupation, and non-commercial composting. None of the Specific Plan permitted uses would be expected to require routine transport, use, or disposal of hazardous waste. The impact of the General Plan Amendment to Specific Plan would be less than significant.

**Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Cannabis cultivation operations would involve the use of pesticides, fertilizers, and other agricultural chemicals, along with propane tanks for the backup generator. Pesticides that would be used in cultivation operations would be approved for use on cannabis by the State and Inyo-Mono Agricultural Commissioner’s office and would comply with Sections 8304(f) and 8307 under Title 3 of the CCR [and Title 4 §16307](#), related to pesticide use requirements of the cannabis cultivation program. In addition, the project applicant would be required to develop a pest management plan for the cannabis cultivation program, identifying all pesticides’ production names and active ingredients, pest management protocols, and signed attestation stating that the applicant would contact the appropriate County Agricultural

### 3 ENVIRONMENTAL IMPACT CHECKLIST

Commissioner regarding the legal use of pesticides, pursuant to Section 8106(a)(3) under Title 3 of the CCR. These regulations are intended to lessen or avoid environmental impacts from the use of pesticides to an acceptable level.

The proposed cultivation activities would generate waste, including potentially hazardous waste, such as cleaners or pesticides. Routine transport, handling, and disposal of these types of wastes could expose people to hazards, if adequate precautions are not taken. Under the CalCannabis Licensing Program by CDFA, project cultivators would be required to store, use, and dispose hazardous materials in accordance with a broad range of applicable laws and regulations that are intended to lessen or avoid environmental impacts to an acceptable level. The project applicant would comply with all CDFA rules and regulations.

Project activities that would transport, use, or store hazardous materials would be done in compliance with applicable local, State, and federal hazardous material regulations, along with the requirements of CDFA. The impact of the cannabis facility would be less than significant.

- b) Would the project 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?**

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for a residential dwelling unit, accessory dwelling unit, home occupation, and non-commercial composting. None of the Specific Plan permitted uses would be expected to require use of hazardous materials that could cause release of hazardous materials. The impact of the General Plan Amendment to Specific Plan would be less than significant.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The cannabis facility would involve use of hazardous materials that would create a potential for on-site releases of these materials. Project personnel and other individuals could be exposed to hazardous material through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Any releases of hazardous material would be unlikely to extend beyond the project site boundary, because of the small volume of hazardous materials that would be used in agricultural or cannabis operations. Project personnel would be required to abide by the Occupational Health and Safety Administration (OSHA) safety and health standards, including use of safety equipment. California Health and Safety Code provisions and the California Accidental Release Prevention (CalARP) program would require any cannabis cultivation facility storing more than a threshold quantity of regulated substances to prepare a Hazardous Materials Business Plan (HMBP). An HMBP requires a chemical inventory of hazardous materials and hazardous wastes, a site diagram, an emergency response plan, and an employee training plan (Solano County). The impact of the cannabis facility would be less than significant.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

- c) **Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

No schools are within 0.25 mile of the project site. The Mono County General Plan Chapter 13, "Cannabis," prohibits any commercial cannabis activities from occurring within 600 feet of schools. The nearest school is approximately 2.3 miles from the project site. The project would comply with applicable General Plan requirements. No impact would occur.

- d) **Would the project 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?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

As required by Section 8102(q) under Title 3 of the CCR for the cannabis cultivation program, a hazardous materials query of the EnviroStor database was conducted for the project site. No known contaminated sites are within 1 mile of the project site (SWRCB, 2021; DTSC, 2021). The nearest known contaminated site is the Comanche Mine and Mill, approximately 2.5 miles north of the project site. This site is under evaluation (DTSC, 2021). The project would not disturb a known hazardous site. No impact would occur.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site is not within an airport land use plan or within 2 miles of a public airport or public use airport. No impact would occur.

- f) **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site is not within the area of an adopted emergency response plan or emergency evacuation plan. The project would include improvements to the access road from Highway 6 to meet County standards for ingress and egress, and is subject to General Plan Chapter 22 – Fire Safe Regulations, and state fire safety regulations (4290 & 4291). The project proposes no changes to Highway 6, which would be the main road for emergency vehicle access and evacuations. No obstructions or other alterations that could hinder access would be installed. The project was noticed to the local fire department and CalFire, and their input has been incorporated into the project. No impact would occur.

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**g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

The project site is in an area designated as a State Responsibility Area, with a California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Rating of Moderate (CAL FIRE, 2007).

**General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for a residential dwelling unit, accessory dwelling unit, home occupation, and non-commercial composting. The project is generally in a low wildfire risk area due to the sparse vegetation density in the area. The General Plan Amendment to Specific Plan would not increase the maximum development density of the site and therefore would not create a significant risk of loss, injury, or death associated with a wildfire. In addition, any future development would need to implement defensible space in compliance with PRC Section 4290 and General Plan Chapter 22, Fire Safe Regulations. The resulting impact would be less than significant.

**Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The conversion of the property to a cannabis facility would allow for the operation of a cannabis facility. Construction of the project would involve widening of the access road to meet County design standards, which would improve ingress and egress from the site and would not create a risk for evacuation in the event of a wildfire. Cannabis uses are not known to create a significant wildland fire hazard. However, a small, temporary increase in on-site fire risk could occur during construction of the cannabis facility and future developments, because of the presence of construction workers and equipment that generate sparks or involve hot work. Construction personnel would be required to abide by OSHA health and safety standards, using personal protective equipment to avoid injury from potential wildfires. In addition, construction and operation of the cannabis facility would need to implement defensible space in compliance with PRC Section 4290 and General Plan Chapter 22, Fire Safe Regulations. The impact would be less than significant.

### 3.11 Hydrology and Water Quality

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <b>10. HYDROLOGY AND WATER QUALITY. Would the project:</b>  |                                |  |                                     |                          |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### 3 ENVIRONMENTAL IMPACT CHECKLIST

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: |                                |  |                                     |                                     |
| i) result in substantial erosion or siltation on- or off-site;   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or                             | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iv) impede or redirect flood flows?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <b>a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?</b>   |                                |  |                                     |                                     |

#### General Plan Amendment

The General Plan Amendment to Specific Plan would allow for a residential dwelling unit, accessory dwelling unit, home occupation, and non-commercial composting. The minor housing development and non-commercial composting allowed under the Specific Plan would not violate water quality standards. The General Plan Amendment to Specific Plan e would not violate water quality standards or waste discharge requirements.

#### Cannabis Use (Specific Plan, Use Permit, Operation Permit)

##### Construction

The cannabis facility would disturb more than 1 acre of soil, and therefore the project would be required to develop and implement an SWPPP under the SWRCB Construction General Permit. The SWPPP would show the construction site perimeters, drainage patterns, existing and proposed structures, lots, roadways, and stormwater collection and discharge points, and also would list the BMPs that would be used for protection from stormwater runoff and the placement of those BMPs. The SWPPP also would set forth a visual and chemical monitoring program, if a failure of best management practices occurs. Grading over 10,000 square feet would require a grading permit from the County, which would include several general construction specifications to minimize soil erosion. The project would not violate any water

### 3 ENVIRONMENTAL IMPACT CHECKLIST

quality standards or waste discharge requirements or otherwise substantially degrade water quality during construction. The impact would be less than significant due to compliance with the SWRCB Construction General Permit and Mono County grading permit requirements.

#### **Operation and Maintenance**

The project is not within a Cannabis Priority Watershed<sup>4</sup> that has been identified by the SWRCB and CDFW (State Water Resources Control Board, n.d.). The cannabis facility would comply with Sections 8102(dd) and 8206 under Title 3 of the CCR regarding locating cultivation activities within a priority watershed. Operation of the cannabis facility would necessitate obtaining coverage under the Cannabis Cultivation General Order (CCGO; Order WQ 2019-0001-DWQ)) from the SWRCB, in accordance with Section 8102(P) under Title 3 of the CCR. The CCGO is a simplified waste discharge requirement, available to cannabis cultivators to regulate discharge of waste associated with cannabis cultivation. In addition, CDFA requires cannabis cultivators to demonstrate compliance with Section 1602 of the Fish and Game Code, by including a CDFW Lake or Streambed Alteration Agreement or receipt of written verification from CDFW that a Streambed Alteration Agreement is not required as a condition of approving a cannabis cultivation license.

The water level underlying the project site can vary throughout the year, but based on a measurement taken in spring 2018, the water level is approximately 54 feet below ground surface (Maranatha Drilling & Pump Service, 2018). A septic system with a leach field is proposed for the cannabis facility. The water table in the area is not considered high enough to require alternative septic systems, such as a septic mound and dosing system, based on the information available at this time. The septic system would be constructed in accordance with the Mono County Health Department's Construction Guide for Residential and Commercial On-Site Sewage Treatment and Disposal System (Construction Guide). The Construction Guide would require testing of trench and percolation rate in the proposed disposal area by the Mono County Health Department. If the Mono County Health Department determines that the project site is not suitable for a traditional sewage disposal system, an alternative system may be required (Mono County Health Department, n.d.). The Construction Guide also identifies criteria for septic system site selection, such as soil percolation rate, depth to groundwater, and slope.

Because operation of the cannabis facility would comply with CCGO and CDFA requirements and Mono County Environmental Health Department's Construction Guide for septic systems, the project would not violate any water quality standards or waste discharge requirements, or

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<sup>4</sup> The SWRCB, in coordination with CDFW, has identified "Cannabis Priority Watersheds" throughout the state that are of special environmental concern and at increased risk of environmental impacts because of cannabis cultivation activities.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

otherwise substantially degrade surface or groundwater quality during operation. The impact would be less than significant.

- b) **Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

#### **Overview**

The project site is underlain by the Owens Valley groundwater basin and is located within the Tri Valley area of the Owens Valley groundwater basin. Although the Owens Valley groundwater basin has been characterized as a low priority basin (Department of Water Resources, 2019), the Owens Valley Groundwater Authority (OVGA) elected to develop a Groundwater Sustainability Plan (GSP) (OVGA, 2020; OVGA, 2021). The Final Groundwater Sustainability Plan for the basin was published on December 9, 2021 (OVGA, 2021). The Final Groundwater Sustainability Plan indicates declines in groundwater elevations of 0.5 to 2 feet annually in the Tri-Valley Management Area (OVGA, 2021), which is the portion of the basin underlying the project area. The GSP projects that groundwater elevations in the area will continue to decline through 2027, and then the groundwater elevations would stabilize and increase due to groundwater sustainability actions (OVGA, 2021). The GSP projects that groundwater wells would be affected by 2030 if the declines in groundwater elevation continue. The GSP also discusses that the declines in groundwater elevation in the Tri-Valley area could affect Fish Slough. The GSP includes management actions to prevent the undesirable conditions including impacts on existing wells and impacts on Fish Slough from groundwater decline. The OVGA and this GSP have no regulatory authority over the project site.

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for a dwelling unit, accessory dwelling unit, and non-commercial composting facility. The dwelling unit and accessory dwelling unit would not create a significant demand for water in the region that would affect sustainable groundwater management. The General Plan Amendment to Specific Plan would have a less than significant impact on sustainable groundwater management.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project would require water use for cannabis cultivation. Water would be supplied from the existing on-site well that produces 2,000 gallons of water per minute. The on-site well has a water level of 54 feet and pumping level at 56 feet (Maranatha Drilling & Pump Service, 2018). Pursuant to Cannabis Cultivation Policy Attachment A (Section 2, Number 98), cannabis cultivators must maintain records of daily water used for irrigation of cannabis for 5 years and make all irrigation records available for review by the SWRCB and CDFW (State Water Resources Control Board, 2019). The SWRCB would monitor water usage for cannabis cultivation activities. The use of groundwater would be approximately 600 gallons per day. Per capita water use in Mono County is approximately 268 gallons per day (Aquacraft Water Engineering & Management, 2011). The average household in Mono County is 2.91 people with an average water use of 780 gallons per day. The proposed cannabis water use would therefore

### 3 ENVIRONMENTAL IMPACT CHECKLIST

be less than the daily average residential water use. The projected water demand would not substantially decrease groundwater supplies.

The project would include small areas (<1 acre) of new impervious surfaces for the cannabis facilities. The less than 1 acre of new impervious surfaces would not appreciably affect groundwater recharge in the basin. The impact would be less than significant.

- c) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**
  - i. **result in substantial erosion or siltation on- or off-site.**

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for a dwelling unit, accessory dwelling unit, and non-commercial composting facility. Development under the Specific Plan would not result in substantial soil erosion on or off site. The Specific Plan prohibits construction in wetter areas per Mitigation Measure BIO-2 thereby improving flood management. The General Plan Amendment to Specific Plan would not affect soil erosion.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Construction of the cannabis facility would include grading and earth-moving activities, which would expose bare soil, resulting in soil erosion. The project would involve up to 1.33 acres of surface disturbance over the entire construction period, exceeding 1 acre and necessitating compliance with the NPDES Construction General Permit. Soil erosion and topsoil loss would be minimized through implementation of the SWPPP and required BMPs, such as installing straw wattles, silt fencing, watering for dust control, and covering exposed surfaces. Operational activities would not involve earth-disturbing activities that could result in erosion. With implementation of erosion control measures, the impact would be less than significant.

- ii. **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.**

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for a dwelling unit, accessory dwelling unit, and non-commercial composting facility. Development under the Specific Plan would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding. The General Plan Amendment to Specific Plan would not affect flooding on or off site.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The cannabis facility would include a parking area, processing facility, and storage shed, introducing approximately 0.25 acre of impervious surface to the site. The cannabis facility would be outside the floodplain, and the activities would not increase flooding on site. The limited area of new impervious surface would not change the rate or amount of surface runoff that would result in flooding off-site. The impact would be less than significant.



### 3 ENVIRONMENTAL IMPACT CHECKLIST

- iii. **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

No existing or planned public stormwater drainage system are located in the project area or vicinity. The Specific Plan and cannabis facility would not affect public stormwater drainage facilities. The cannabis facility proposes capture and treatment of effluent to meet all water quality standards. Compliance with laws for protection of water quality would avoid significant impacts from polluted runoff. The impact would be less than significant.

- iv. **impede or redirect flood flows?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The northern portion of the northern project parcel is within a floodplain. Development of structures on the parcel under the Specific Plan would require compliance with County design guidelines including avoidance of floodplains. The cannabis facility would be outside the floodplain and development within the floodplain area is prohibited per Mitigation Measure BIO-2. The cannabis facility would not impede or redirect flood flows. No impact would occur.

- d) **Would the project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The northern portion of the northern project parcel would be within a flood plain. The project would not be within a tsunami or seiche zone. Development of structures on the parcel under the Specific Plan would require compliance with County design guidelines including avoidance of floodplains. The cannabis facility would not be in a flood hazard, tsunami, or seiche zone. The project would not risk release of pollutants because of project inundation. No impact would occur.

- e) **Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The project is located in the Owens Valley Basin. On December 9, 2021, the OVGA adopted the Owens Valley Groundwater Basin Final Groundwater Sustainability Plan (Owens Valley Groundwater Authority, 2021). The Owens Valley groundwater basin is designated as low priority under the Sustainable Groundwater Management Act (DWR, 2019). The project would not conflict with or obstruct implementation of any of the actions included in the GSP as discussed under Impact (b) above. The Owens Valley Groundwater Authority and Groundwater Sustainability Plan do not have authority over the project site.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

The Lahontan Basin Plan is the water quality control plan covering the project region (LRWQCB, 1995). The Lahontan Basin Plan defines water quality standards and objectives for water quality through the Lahontan region. The water bodies downstream from the project site are not impaired, and a total maximum daily load has not been adopted. The cannabis facility would need to comply with policies for water quality defined in the Lahontan Basin Plan. The project would not conflict with or obstruct implementation of a water quality control plan. No impact would occur.

## 3.12 Land Use and Planning

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>11. LAND USE AND PLANNING. Would the project:</b>   |                                |  |                                     |                                     |
| a) Physically divide an established community?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**a) Would the project physically divide an established community?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The project site is mostly undeveloped and is adjacent to residential uses to the south. No established community is within or adjacent to the project parcels. Future development under the Specific Plan would not divide an established community because agricultural uses are to the north and east, and industrial uses are to the west of the project site. The project would not construct a new roadway, flood control channel, or other structure that would physically divide any community. No impact would occur.

**b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The cannabis facility is subject to County approval of the CUP and would need to comply with all County requirements for cannabis operations contained in the General Plan and County Code Chapter 5.60. The Specific Plan is proposed so that the cannabis operations would comply with the General Plan requirements for cannabis use. The CUP is integrated into the Specific Plan and applies these standards. The cannabis facility would not conflict with a land use plan, policy, or regulation with the proposed Specific Plan. The impact would be less than significant.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

#### 3.13 Mineral Resources

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| <b>12. MINERAL RESOURCES. Would the project:</b>   |                                |  |                              |                                     |
| 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?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| <p>a) <b>Would the project 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?</b></p> <p>b) <b>Would the project 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?</b></p> |                                |  |                              |                                     |

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The California Legislature enacted the Surface Mining and Reclamation Act (SMARA) in 1975, to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining on public health, property, and the environment. SMARA requires the California Department of Conservation’s Geological Survey Program to conduct Mineral Land Classification surveys. These surveys designate land areas, such as mineral resources zones or aggregate resource zones, depending on the type of resources identified in the area. The project area is designated as mineral resource area (MRA) 4: an area where available information is inadequate for assignment to any other MRA, and the project area is adjacent to areas designated as MRA 2, where adequate information indicates significant mineral deposits (CDC, 2015). The project area previously contained a mine; however, the mine has been abandoned. Cannabis use of the site or development under the Specific Plan would not preclude any future access to or availability of any mineral deposits that could occur in the site. The project would not result in the loss of availability of a known mineral resource. No impact would occur.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

#### 3.14 Noise

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>13. NOISE. Would the project result in:</b>  |                                |  |                                     |                                     |
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Generation of excessive groundborne vibration or groundborne noise levels?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

- a) **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

#### General Plan Amendment

The General Plan Amendment to Specific Plan would allow for a dwelling unit, accessory dwelling unit, and non-commercial composting facility. The uses allowed under the Specific Plan would not generate significant noise. The Specific Plan land use and zoning change would not result in generation of substantial temporary or permanent noise. The impact of the General Plan Amendment to Specific Plan would be less than significant.

#### Cannabis Use (Specific Plan, Use Permit, Operation Permit)

The project would involve cultivation and distribution of cannabis. The cannabis facility would be more than 1,000 feet from the nearest sensitive receptor. Stationary point sources of noise, including construction equipment, attenuate (lessen) at a rate of 6 to 7.5 dB per doubling of distance from the source, depending on ground absorption. Soft sites, such as the proposed project site, attenuate at 7.5 dB per doubling because they have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. Mono County noise ordinance limits construction noise levels for mobile sources at the nearest sensitive receptor at 75dBA Monday – Saturday from 7:00 a.m. to 6:59 p.m and 60 dBA during the period 7:00 a.m. to 6:59 p.m. Maximum noise levels generated by construction equipment that would be used by the project at a distance of 50 feet is provided below.

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| Construction Equipment | Noise Level (dB, L <sub>max</sub> at 50 feet) |
|------------------------|---|
| Forklift <sup>1</sup>  | 77  |
| Backhoe                | 78  |
| Excavator              | 81  |
| Dozer                  | 82  |
| Dump Truck             | 76  |

NOTES:

L<sub>max</sub> = maximum sound level

An attenuation rate of 7.5 per doubling distance was used to convert the FHWA noise levels at 50-feet to the noise levels at 600-feet.

<sup>1</sup> Ldn Consulting Inc, Noise Assessment for Tractor Supply Commercial Development, March 28, 2016.

Source: (FHWA, 2006)

Due to the attenuation of noise with distance, the maximum noise experienced at the nearest sensitive receptor at 1,500 feet from the project would be approximately 45 dB, which would generally be indistinguishable from background noise levels.

Cannabis activities do not include regular use of noise generating equipment. The generator would only operate 50 hours per year for testing. The cannabis facility operation would not produce continuous operational noise that would be audible at any receptor location. The project applicant also would comply with the standards in Chapter 10.16 of the Mono County Code, so that on-site operations would not generate noise with an intensity that would exceed County standards at noise sensitive land uses. The impact of the cannabis facility would be less than significant.

**b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**

**General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for a dwelling unit, accessory dwelling unit, and non-commercial composting facility. The Specific Plan allowed uses would not create excessive groundborne vibration. The impact of the Specific Plan would be less than significant.

**Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Groundborne vibration dissipates rapidly over distance with most vibration-related damages occurring within 25 feet of the vibration source. Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. In most cases, vibration induced by typical construction equipment does not result in adverse effects on people or structures (Caltrans, 2013). At the highest levels of vibration, damage to structures is primarily architectural (e.g., loosening and cracking of plaster or stucco coatings) and rarely results in structural damage. For vibration, a peak particle velocity (ppv) threshold of 0.5 inch per second or greater can cause architectural damage and minor structural damage. The Federal Transit Administration (FTA) recommends a threshold of 0.5 ppv for residential and commercial structures, 0.25 ppv for historic buildings and archaeological sites, and 0.2 ppv for non-engineered timber and masonry buildings (FTA, 2006).

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Vibrational effects from typical construction activities are only a concern when construction occurs within 25 feet of existing structures (Federal Transit Administration, 2018). No sensitive receptors are within 25 feet of the project site; therefore, the construction activities would not produce vibration that would be noticeable or exceed thresholds at the nearest receptor located 1,500 feet from the project. Operation of the facility would not involve use of equipment that would generate vibration and no vibration would occur at the nearest receptor. The resulting impact from vibration would be less than significant.

- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

#### General Plan Amendment, Specific Plan, and Cannabis Use

The project site is not in the vicinity of a private airstrip or an airport land use plan, or within 2 miles of a public airport or public use airport. The nearest airport, Eastern Sierra Regional Airport, is approximately 30 miles south of the project site. The proposed cannabis facility or future development under the Specific Plan would not expose people working in the project area to excessive noise levels. No impact would occur.

### 3.15 Population and Housing

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>14. POPULATION AND HOUSING. Would the project:</b>   |                                |  |                                     |                                     |
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

- a) **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

#### General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)

Future development under the Specific Plan or cannabis project could include a single-family residence, accessory dwelling units, and farm labor housing on the property limited to those employed by the operation. The Specific Plan would allow for a residence to be constructed on each parcel, similar to the existing Rural Residential land use. As noted above, the average household size is approximately 2.91 persons. The development of a residence, JADU, and ADU

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on each parcel could increase the area’s population by approximately 18 persons, but would not result in significant unplanned population growth. The cannabis facility would create one to two seasonal employee positions and one permanent position on site and would not cause significant population growth. The overhead powerline utility extension would only be for the project site, and the proposed project would not include extensions of roads or other infrastructure that would directly induce population growth in the area. The impact would be less than significant.

- b) **Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

No housing or population is inhabiting the project area. The project would not displace people or housing. No impact would occur.

### 3.16 Public Services

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| <b>15. PUBLIC SERVICES.</b>   |                                |  |                                     |                          |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Police protection?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Schools?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Parks?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other public facilities?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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- 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:**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

##### **Fire protection**

The cannabis facility and future development under the Specific Plan would be similar to existing uses in the surrounding areas. Operation of a cannabis facility is not known to create a significant risk for fire ignition, as analyzed under Section 3.9, Hazards and Hazardous Material, Impact g). If a fire occurs, fire service would be provided by White Mountain Fire Protection District (WMFPD). The WMFPD provides fire prevention/suppression and emergency medical response services to the communities of Benton and Hammil Valleys (Mono County Local Agency Formation Commission, 2009). The cannabis facility and future developments under the Specific Plan would not affect response times or service ratios for the WMFPD's fire station in Benton, and no need would exist to create a new or altered fire station. The impact would be less than significant.

##### **Police Protection**

Police services for the project site would be provided by the California Highway Patrol and Mono County Sheriff's Office (Draper, 2021).

The cannabis facility would have appropriate security measures and systems installed, including lighting and perimeter fencing that would generate minimal additional need for police protection, and the facility would not require additional service beyond those currently available. A Security Plan is required for the County's Cannabis Operation Permit, and must be approved by the Mono County Sheriff's Office. The impact would be less than significant.

##### **Schools**

The nearest school to the project site is Edna Beaman Elementary School, approximately 2.4 miles north of the project site. The Specific Plan would allow for a residence to be constructed on the site, similar to the existing Rural Residential land use. The development of a single residence, ADU, JADU, and farm labor housing on both parcels would not result in the need for new school facilities. The cannabis facility would create one to two seasonal employee positions and one permanent position on site. The one permanent operational position at the cannabis facility would not induce substantial population growth that would impact schools. The allowed residential development including farm labor housing would allow for up to 18 people to occupy the area, which would not cause substantial population growth. The impact would be less than significant.

##### **Parks and Other Public Facilities**

The Specific Plan land use designation would allow for development of a residence, accessory dwelling unit, and farm labor housing. The allowed development would not result in the need for additional parks to be constructed or impact other governmental facilities because the



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facilities would not significantly increase population. The additional workforce associated with the cannabis facility (one full-time and two part-time employees) and any future residences on the site would be served by parks and facilities from the region. The impact would be less than significant.

#### 3.17 Recreation

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>16. RECREATION.</b>   |                                |  |                                     |                                     |
| 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? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 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?                        | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

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?**

#### General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)

No parks are in the project area or vicinity however public lands in the surrounding area offer recreation opportunities. The Specific Plan would allow for the same level of population density as the existing land use and would not substantially increase use of parks. The cannabis facility would create only one permanent job. The project would not indirectly increase the use of existing neighborhood or regional parks or other recreation facilities. The impact would be less than significant.

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?**

#### General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)

Neither the Specific Plan nor the cannabis facility include the creation of recreation facilities or expansion of recreation facilities. The cannabis facility would create only one permanent job and would not cause the need for construction or expansion of recreational facilities. No impact would occur.

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## 3.18 Transportation

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| <b>17. TRANSPORTATION. Would the project:</b>  |                                |  |                                     |                          |
| a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?           | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in inadequate emergency access?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

Highway 6 would be the main roadway providing access to the project site.

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for development of a residence and an accessory dwelling unit. Any residential development on the site would need to comply with County design standards for the roadway. The impact of the Specific Plan on the circulation system would be less than significant.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The cannabis facility would result in eight daily worker vehicle trips (by a maximum of four construction workers) on Highway 6 during construction. The cannabis facility would have one permanent worker who would live on site. Up to four one-way vehicle trips would be associated with workers during operation. The cannabis facility also would include approximately one delivery truck trip per month during facility operation. The low level of worker and truck trips generated by the project would not conflict with existing or proposed (e.g., bicycle) uses of Highways 6. Access to the facility would comply with County design standards and would allow for safe access from Highway 6. The increase in daily trips would not significantly impact the circulation system. Project implementation would not conflict with a program, ordinance, or policy addressing the circulation system. The impact would be less than significant.

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

Mono County adopted vehicle miles traveled (VMT) thresholds, which are effective August 4, 2022. The VMT thresholds include screening criteria, including a small project screening criteria for projects that generate fewer than 237 daily unadjusted trip ends. Projects that do not exceed the VMT screening criteria are presumed to have a less-than-significant VMT impact.

**General Plan Amendment**

The General Plan Amendment would allow for development of a residence and accessory dwelling unit. The development of a residence, JADU, and ADU on each parcel could create a total of six residential dwellings. Trip generation rates for Mono County were conservatively estimated to be 6 trips per residential dwelling (Mono County, 2015). The General Plan Amendment would therefore generate a maximum of 36 trips per day. The project would generate fewer than 237 trips per day and the impact would therefore be less than significant.

**Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Future development under the Specific Plan and the cannabis facility could provide employment opportunities in the area and an incremental population increase on the project property. Employees would generate an average of four one-way trips a day, Monday through Friday. Cannabis wholesale distribution during harvest would necessitate up to three round-trip truck trips per month to retail locations. The total trip generation for the cannabis use would be approximately 4 to 5 trips per day and fewer than the VMT screening threshold of 237 trips per day. The impact would be less than significant.

**c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The County would review any roads constructed under the Specific Plan during the building permit application review and process. Cannabis is not subject to the Right-To-Farm Ordinance and therefore incompatible uses are subject to nuisance provisions. However, the project site is located in an area with substantial agricultural zoning, reducing the likelihood of incompatible uses. The impact would be less than significant.

**d) Would the project result in inadequate emergency access?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Future development under the Specific Plan and the cannabis facility would be required to abide by the Mono County Emergency Operations Plan (EOP), which would provide a framework for management and coordination in response to major emergencies in the county. The plan links detailed standard operating procedures at the local level to broader State and federal disaster planning. The EOP also addresses potential transportation-related hazards in Mono County (including earthquakes, volcanic eruptions, floods, and hazardous materials

### 3 ENVIRONMENTAL IMPACT CHECKLIST

transport), as well as emergency preparedness and emergency response for the regional transportation system, including identification of emergency routes. The County also would consult with CAL FIRE for emergency access requirements for new development in the State Responsibility Areas that cover most of the private property in Mono County. The project is required to comply with General Plan Chapter 22, Fire Safe Regulations. The impact would be less than significant.

## 3.19 Tribal Cultural Resources

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                |
|---|--------------------------------|--|------------------------------|--------------------------|
| <b>18. TRIBAL CULTURAL RESOURCES.</b>   |                                |  |                              |                          |
| a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:                                  |                                |  |                              |                          |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or  | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>     | <input type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.        | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                | <input type="checkbox"/>     | <input type="checkbox"/> |
| a) <b>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</b>                           |                                |  |                              |                          |
| i. <b>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</b>   |                                |  |                              |                          |
| ii. <b>A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</b> |                                |  |                              |                          |

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#### **Overview**

The County began tribal notification for the project in accordance with SB 18 and AB 52 in June 2020, May 2021, February 2022, and March 2022 (Table 3-9). No communication or request for additional consultation was received from any notified tribes. No tribal cultural resources were identified by the consulted tribes. Three prehistoric resources were identified in the project parcels during cultural resource surveys that are eligible for listing in the CRHR (Table 3-8), which have the potential to be tribal cultural resources.

#### **General Plan Amendment**

The General Plan Amendment to Specific Plan would allow for construction of a residence, accessory dwelling unit, and non-commercial composting, similar to the existing land use designations. The General Plan Amendment to Specific Plan would not impact tribal cultural resources.

#### **Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

The proposed overhead powerline associated with the cannabis facility would be installed in the vicinity to one of the prehistoric resources (TS-5). Construction of the leach field and greenhouses could uncover previously undiscovered tribal cultural resources, as defined under PRC Section 21074(a). As analyzed under Impact CUL-1, damage to known and previously undiscovered archaeological resource would result in a significant impact. Mitigation Measure CUL-2 requires a cultural resources specialist to be present for construction activities within 50 feet of a known resource. If any known or suspected cultural resources are found during construction, the resources would be evaluated and protected. Mitigation Measure CUL-3 specifies requirements for contacting Native Americans if a resource is discovered during construction that is a potential tribal cultural resource. In addition, adherence to the Native American Historical Cultural and Sacred Sites Act Sections 5097.9 to 5097.991 would provide protection to American historical and cultural resources and sacred sites, which require notification to descendants of discoveries of Native American human remains and require treatment and disposition of human remains and associated grave goods. Because the laws, regulations, and mitigation measures specify procedures for avoidance and protection of archaeological resources, the impact on tribal cultural resources would be less than significant with mitigation.

**Mitigation:** Implement Mitigation Measures CUL-2 and CUL-3.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

## 3.20 Utilities and Service Systems

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| <b>19. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>   |                                |  |                                     |                                     |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

- a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

### General Plan Amendment

The General Plan Amendment to Specific Plan would allow for construction of a residence, accessory dwelling unit and farm labor housing, which could require water. The allowed population density and development under the Specific Plan is the same as the allowed population density under the existing Rural Residential land use designation. The General Plan Amendment to Specific Plan would not require construction of new or expanded utilities. No impact would occur.

### Cannabis Use (Specific Plan, Use Permit, Operation Permit)

Water for construction and operation of the cannabis facility would be provided by an existing on-site well in the northeast corner of the project property. A septic tank and leach field would also be constructed at the property. The project would not require construction of new water supply facilities. The energy source for the project would be SCE. The project would require an

### 3 ENVIRONMENTAL IMPACT CHECKLIST

extension of overhead power distribution lines, running parallel to the parcel's southern property line to the processing facility. The proposed power line extension could have a significant impact on the environment due to the presence of significant cultural resources in the vicinity of the power line (Drews, 2021). No other utility extension would be required. The impacts of the power line extension in relation to cultural resources are evaluated in Section 3.6 Cultural Resources and Section 3.19 Tribal Cultural Resources. The preferred method of power distribution is by overhead lines with power-pole. The impact would be less than significant.

- b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Operation of the cannabis facility would require approximately 600 gallons of water per day (0.7 acre-foot per year). The amount of water required for the cannabis operation is equivalent to the water demand of six individuals (on average in California) (National Environmental Education Foundation, 2022). The groundwater basin underlying the project site is the Owens Valley groundwater basin, which is categorized as low priority (California Department of Water Resources, 2019). The estimated groundwater use in this basin is approximately 134,680 acre-feet, representing 84 percent of the groundwater supply (California Department of Water Resources, 2021). The remaining 16 percent of the groundwater supply would be approximately 25,653 acre-feet and would be available, and sufficient, for operation of the cannabis facility (0.7 acre-feet). The use of groundwater for the cannabis facility would not exceed water supplies in the basin during normal, dry, or multiple dry years. The change in land use from Rural Residential to Specific Plan does not confer any water rights to the property and the Specific Plan designation permitted uses would have the same water demand as the permitted uses under the existing Rural Residential designation. In addition, the existing well is only 56 feet deep and significant groundwater use would affect the ability of the landowner to operate the well. The impact would be less than significant.

- c) Would the project 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?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

A 1,000-gallon septic tank and 120-foot leach field would be constructed as part of the cannabis facility. The cannabis facility would not connect an established wastewater treatment plant. Any future development under the Specific Plan would require installation of a septic tank. No impact would occur.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? or

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

#### General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)

Benton Crossing Landfill currently serves as the regional landfill for Mono County, and it is the only site in Mono County that accepts municipal solid wastes. Capacity at this landfill is expected to be adequate through 2023, after which the site will be closed (CalRecycle, 2021a). The cannabis facility would not generate a substantial volume of solid waste that could not be accommodated at Benton Crossing Landfill, based on the small volume of waste that would be generated from the cannabis facility. Pumice Valley Landfill is expected to be available for solid waste disposal after the Benton Crossing Landfill ceases operation in 2023. Pumice Valley Landfill has a remaining capacity of 358,790 cubic yards and is expected to be operational until 2028 (CalRecycle, 2021b). The County is anticipating extending the operation life of the landfill. Cannabis cultivation activities would generate several distinct types of waste, including green waste, solid waste, liquid waste, and potentially hazardous waste, such as heavy metal, cleaners, or pesticides. As indicated in the fee summaries of Benton Crossing Landfill and Pumice Valley Landfill, both landfill sites accept hazardous waste, including paints, pesticides, and cleaning products (Mono County Department of Public Works, 2016b; Mono County Department of Public Works, 2016a). All project-related waste would be disposed at permitted solid waste facilities and in accordance with local and State regulations [including CCR Title 4 §17223](#). The impact would be less than significant.

### 3.21 Wildfire

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| <b>20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>  |                                |  |                                     |                          |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |



### 3 ENVIRONMENTAL IMPACT CHECKLIST

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|--|-------------------------------------|--------------------------|
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?  | <input type="checkbox"/>       | <input type="checkbox"/>                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### Overview

The project site is on State Responsibility Area lands, identified by CAL FIRE as a Moderate Fire Hazard Severity Zone (CAL FIRE, 2007). The nearest Very High Fire Hazard Severity Zone is approximately 18 miles west of the project site.

- a) **Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

#### General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)

The project parcels do not cross Highway 6, and neither the Specific Plan nor cannabis facility would involve any activities that would block Highway 6 or State Route 120 and affect evacuation in the event of an emergency. The cannabis facility would add approximately one permanent job, and the amount of additional traffic related to operation of the facility would not inhibit or slow down evacuation if a wildfire occurs. The impact would be less than significant.

- b) **Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

#### General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)

The topography of the project site is relatively flat, with minimal slope. The project site has no slope or prevailing winds that would exacerbate wildfire risk and expose future project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. The impact would be less than significant.

### 3 ENVIRONMENTAL IMPACT CHECKLIST

- c) **Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

Construction activities associated with future development and the cannabis facility would have a less than significant impact related to a temporary increased risk of wildfire ignition, as analyzed under Section 3.9, Hazards and Hazardous Material Impact g. A new powerline would be installed overhead for the cannabis facility. The short extension of distribution line from the property limit to the cannabis facility would not exacerbate fire risks because the power and distribution lines already occur in the area. The applicant is responsible for maintain powerlines in good condition to prevent wildfire ignition. The energy provider, Southern California Edison, is responsible for issuing Public Safety Power Shutoffs during the times wildfire is a risk. The impact would be less than significant.

- d) **Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

The project site is on flat land. Future agricultural structures under the cannabis facility would be constructed in accordance with applicable building standards. No people or structures would be exposed to a significant risk because of runoff, post-fire slope instability, or drainage changes. Risk to these hazards has been minimized by Mitigation Measure BIO-2 which prohibits future development in riparian areas and floodplains. The impact would be less than significant.

### 3.22 Mandatory Findings of Significance

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact                |
|--|--------------------------------|--|------------------------------|--------------------------|
| <b>21. MANDATORY FINDINGS OF SIGNIFICANCE.</b>   |                                |  |                              |                          |
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? |                                | <input checked="" type="checkbox"/>                | <input type="checkbox"/>     | <input type="checkbox"/> |

### 3 ENVIRONMENTAL IMPACT CHECKLIST

|  |                          |                                     |                                     |                          |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 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)? | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |

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

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Perm it, Operation Perm it)**

##### **Habitat of Fish and Wildlife Species and Populations**

The dominant habitat types on the project site (sagebrush scrub) are common throughout the great basin. The project would not substantially reduce the habitat of a fish or wildlife species because the 80 acres of suitable habitat on the project site is common throughout the region. No fish or wildlife populations are known to occupy the project area. The project would not cause a fish or wildlife population to drop below self-sustaining levels. The impact would be less than significant.

##### **Plant or Wildlife Community**

The known and potential plant and wildlife communities discussed in Section 3.4, Biological Resources, in the project area are considered common throughout the region. The commercial cannabis activities would not threaten to eliminate any plant or wildlife community with implementation of Mitigation Measures BIO-1, BIO-2, and BIO-3. The impact would be less than significant with mitigation.

**Mitigation:** Implement Mitigation Measures BIO-1, BIO-2, and BIO-3.

##### **Rare or Threatened Plant or Wildlife**

The project area provides suitable habitat for several rare plants. No threatened plant or wildlife species were observed or would have the potential to occur in the project site (Panorama Environmental, Inc., 2020; Kokx, 2019). No impact would occur.

##### **California History or Prehistory**

The project area is adjacent to known archaeological resources, and construction of the project could result in a significant impact on cultural resources. The project would not result in a significant impact on cultural resources with implementation of Mitigation Measure CUL-1, CUL-2, and CUL-3. The impact would be less than significant with mitigation.

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**Mitigation:** Implement Mitigation Measures CUL-1, CUL-2, and CUL-3.

- 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)?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Cumulative projects are proposed in the vicinity of the project site include the Chalfant Transfer Station Telecommunications project located 18 miles from the project site, which would involve installation of telecommunications at the Chalfant Transfer Station in mid-2022. One transportation project is planned in the project vicinity, the Benton Pavement Project, also along Highway 6 from north of Benton to the intersection of Highway 6 and Falls Creek Road (Caltrans, 2021). The Benton Pavement Project currently is in the planning phase, and tentative construction is scheduled for October 2028 to December 2032 (Caltrans, 2021).

A lot merger application has been filed for Dakota Ranch, approximately 6 miles north of the project site (Mono County, 2020). Four parcels are to be merged under this application. All of the parcels have an existing land use designation of Agriculture. No development is proposed in conjunction with the lot merger.

The cumulative projects are located at a distance from the proposed project and are different in nature than the proposed project. The change in land use to Specific Plan and development of the cannabis facility at the site would not result in cumulative impacts when considered in connection with the other planned projects, discussed above. The cumulative impacts would be less than significant.

- c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

#### **General Plan Amendment and Cannabis Use (Specific Plan, Use Permit, Operation Permit)**

Environmental effects that may have an adverse effect on human beings, either directly or indirectly, are analyzed in each environmental resource section above. Construction of the cannabis facility would occur for up to 8 months. The nearest residence is 230 feet south of the project site. As discussed above, the air pollutant emissions or noise levels associated with construction activities would be less than significant at the nearest sensitive receptor. Construction workers could be exposed to air pollutants, including dust and diesel exhaust, and elevated noise levels. These impacts would be short-term and would cease on completion of construction. In addition, project construction workers would be subject to OSHA safety and health standards, including the required use of safety equipment during operation of loud equipment.

Operation of the cannabis facility would result in emission of odors and toxic air contaminant emissions from operation of the cannabis facility uses include motor vehicle and the backup

### 3 ENVIRONMENTAL IMPACT CHECKLIST

generator emissions. No negative health effects are known to be associated with exposure to cannabis odor; however, cannabis odor could result in annoyance and complaints from nearby residents. Implementation of Mitigation Measure AQ-1 would minimize any cannabis odors from indoor project operations. Outdoor cultivation may generate nuisance odors, however outdoor cultivation will be temporary until all greenhouses are constructed. Odor generated by outdoor cultivation is expected to be mitigated by prevailing winds and the large distance to sensitive receptors. The impact on humans from construction and operation of the proposed project would be less than significant with mitigation.

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## 5 Report Preparers

This section lists those individuals who either prepared or participated in preparation of this Initial Study/Mitigated Negative Declaration. Panorama Environmental prepared this document under the direction of the Mono County Community Development Department. The following staff listed in Table 5-1 contributed to this Initial Study/Mitigated Negative Declaration.

**Table 5-1 Report Preparers**

| Contributor                   | Title                                      | Role  |
|-------------------------------|--|---|
| <b>Mono County</b>            |  |   |
| Wendy Sugimura                | Mono County Community Development Director | Oversight and Senior Review                             |
| Michael Draper                | Mono County Planning Analyst II            | Project Manager, Planning                               |
| <b>Panorama Environmental</b> |  |   |
| Susanne Heim                  | Principal/Senior Reviewer                  | Project Management and Quality Control/ Document Review |
| Caitlin Gilleran              | Project Manager                            | Project Management and Quality Control/Document Review  |
| Catherine Medlock             | Environmental Planner                      | Preparation of IS/MND                                   |
| Corey Fong                    | GIS Specialist                             | GIS/Graphics  |

## 5 REPORT PREPARERS

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## Appendix A

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### **Mitigation Monitoring and Reporting Plan**

# Mitigation Monitoring and Reporting Plan

## MMRP Requirements and Use

Mono County prepared an Initial Study (IS) to identify and evaluate potential environmental impacts associated with the proposed commercial cannabis facility. Mitigation measures are defined in the IS to reduce potentially significant impacts of project construction and operation. All measures designated as mitigation measures reduce potential impacts to the associated resource to less than significant levels.

Implementation of the proposed project will require execution and monitoring of all the mitigation measures identified in the IS. The California Environmental Quality Act (CEQA) Section 15097(a) requires that:

“... In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.”

CEQA Section 15097(c) defines monitoring and reporting responsibilities of the lead agency.

“(c) The public agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. "Monitoring" is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both. The choice of program may be guided by the following:

- (1) Reporting is suited to projects which have readily measurable or quantitative mitigation measures or which already involve regular review. For example, a report may be required upon issuance of final occupancy to a project whose mitigation measures were confirmed by building inspection.
- (2) Monitoring is suited to projects with complex mitigation measures, such as wetlands restoration or archeological protection, which may exceed the expertise

## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

of the local agency to oversee, are expected to be implemented over a period of time, or require careful implementation to assure compliance.

(3) Reporting and monitoring are suited to all but the most simple projects. Monitoring ensures that project compliance is checked on a regular basis during and, if necessary after, implementation. Reporting ensures that the approving agency is informed of compliance with mitigation requirements.”

This Mitigation Monitoring and Reporting Program (MMRP) is meant to facilitate implementation and monitoring of the mitigation measures to ensure that measures are executed. This process protects against the risk of non-compliance.

The purpose of the MMRP is to:

- Summarize the mitigation required for vegetation treatment projects
- Comply with requirements of CEQA and the CEQA Guidelines
- Clearly define parties responsible for implementing and monitoring the mitigation measures
- Provide a plan for how to organize the measures into a format that can be readily implemented by the County and monitored

### MMRP Components

The MMRP provides a summary of all mitigation measures that will be implemented for the project. Mitigation measures could be applicable during one or more implementation phase or location. Each mitigation measure is accompanied with identification of:

- Timing – measures may be required to be implemented prior to construction, during construction, post construction, or a combination of construction phases
- Application Locations – locations where the mitigation measures will be implemented.
- Monitoring/Reporting Action – the monitoring and/or reporting actions to be undertaken to ensure the measure is implemented.
- Responsible and Involved Parties – the party or parties that will undertake the measure and will monitor the measure to ensure it is implemented in accordance with this MMRP

The responsible and involved parties will utilize the MMRP to identify actions that must take place to implement each mitigation measures, the time of those actions and the parties responsible for implementing and monitoring the actions.

## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

### Mitigation Monitoring and Reporting Program

| Mitigation Measures  | Applicable Locations                 | Timing              | Monitoring/Reporting Action   | Responsible and Involved Parties  |
|--|--------------------------------------|---------------------|---|---|
| <p><b>Mitigation Measure DARK-1: Dark Sky Compliance</b></p> <p>The Mono County Outdoor Lighting Ordinance (also known as the ‘Dark Sky Regulations’) was adopted to protect night sky views, enhance travel safety, conserve energy and limit light trespass and glare by restricting unnecessary upward projection of light. The regulations prohibit nonconforming light of all types, including signage, fixtures, outdoor sports, recreation and entertainment. The County pairs the Dark Sky regulations with information and guidelines, including educational materials distributed to provide applicants with design recommendations and suggestions for minimizing intrusive light sources (General Plan Land Use Element Ch. 23).</p> <p>Lighting on the project site shall be subject to requirements of the Mono County General Plan, Chapter 23 Dark Sky Regulations. The Dark Sky Regulations are comprehensive, adaptive, and designed to meet six specific objectives that include:</p> <ul style="list-style-type: none"> <li>• To promote a safe and pleasant nighttime environment;</li> <li>• To protect and improve safe travel;</li> <li>• To prevent nuisances caused by unnecessary light;</li> <li>• To protect night sky views;</li> <li>• To phase out existing nonconforming fixtures; and</li> <li>•</li> </ul> <p>Only full cutoff luminaires with light source downcast and fully shielded, with no light emitted above the horizontal plane are permitted. Kelvin color temperature should be approximately 2,300K, and temperatures over 3,000K are prohibited. Exterior night lighting shall be fully shielded in compliance with Chapter 23, Dark Sky Regulations, of the General Plan to maintain the existing darkness. Exterior lighting shall be limited to that required for security and safety.</p> | Any area within the project boundary | During construction | Install lighting in compliance with the Mono County ‘Dark Sky Ordinance’ and additional requirements indicated in the mitigation measure. | <ul style="list-style-type: none"> <li>• Project Applicant</li> <li>• Contractor</li> <li>• County</li> </ul> |

## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

| Mitigation Measures   | Applicable Locations                            | Timing   | Monitoring/Reporting Action  | Responsible and Involved Parties   |
|---|---|--|--|--|
| <p><b>Mitigation Measure Air Quality-1: Odor Control Measures</b></p> <ul style="list-style-type: none"> <li>The project applicant shall install an odor control system for indoor cultivation. The indoor odor control system must meet or exceed an odor removal efficiency of 91 to 96 percent, consistent with the proposed Cannabuster™ odor elimination system (Pinchin, 2020). The odor control system shall be properly maintained and implemented throughout the life of the project for facilities to control odors from facility processes that produce nuisance odors at the nearest residential property.</li> <li>The applicant shall post signs at the property line that provide a 24-hour project contact phone number in the case of nuisance odors.</li> <li>The applicant shall report any complaints of nuisance odors to the County within 72 hours of the complaint.</li> <li>The County may request modifications to the odor control system during project operation should nuisance odors persist at the property boundary after application of the odor control system.</li> <li>If odor from outdoor cultivation is determined to be a nuisance, the County may require cultivation to be moved to the indoor greenhouses by the next cultivation cycle.</li> </ul> | <p>All indoor and outdoor cultivation areas</p> | <p>During Operations for the life of the project.</p>  | <p>Project Applicant ensures project-related odors is minimized.</p> <p>Applicant shall report complaints to the Community Development Department within 72-hours.</p> | <ul style="list-style-type: none"> <li>Project Applicant</li> <li>County</li> </ul>                      |
| <p><b>Mitigation Measure Biology-1: Nesting Bird Survey</b></p> <p>A preconstruction survey shall be performed prior to construction. The following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>Use of heavy equipment, grading, demolition, construction, and/or tree removal, shall avoid the nesting season to the greatest extent feasible.</li> <li>If use of heavy equipment, grading, demolition, construction, and/or tree removal are scheduled to occur during the nonbreeding season (September 1 through February 15), no measures are required.</li> </ul>   | <p>Any area within the project boundary</p>     | <p>Prior to construction during the nesting season (February 16 – August 31)</p> <hr/> <p>During construction during the nesting season if active nests occur in the area.</p> | <p>1) Conduct pre-construction survey</p> <p>2) establish active nest buffers.</p> <hr/> <p>Maintain active nest buffers until the nestlings have fledged.</p>         | <ul style="list-style-type: none"> <li>Qualified biologist</li> <hr/> <li>Qualified biologist</li> </ul> |



## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

| Mitigation Measures  | Applicable Locations | Timing | Monitoring/Reporting Action | Responsible and Involved Parties |
|--|----------------------|--------|-----------------------------|----------------------------------|
| <ul style="list-style-type: none"> <li>• If construction activities occur during the nesting season, a pre-construction survey for active bird nests in the project site shall be conducted on the project site and within 500 feet of the project site by a qualified biologist approved by the County.               <ul style="list-style-type: none"> <li>– If no nesting or breeding behavior is observed, construction may proceed.</li> <li>– If an active nest is detected, a determination shall be made by a qualified biologist as to whether construction work could affect the active nest. If it is determined that construction would not affect an active nest, work may proceed.</li> <li>– If an active nest is detected, <del>a determination shall be made by a qualified biologist as to whether construction work could affect the active nest. If it is determined that construction would not affect an active nest, work may proceed. If it is determined that construction activities are likely to impair the successful rearing of the young,</del> a 'no-disturbance buffer' in the form of orange mesh Environmentally Sensitive Area (ESA) fencing shall be established around occupied nests to prevent destruction of the nest and to prevent disruption of breeding or rearing behavior. The extent of the 'no-disturbance buffer' shall be <u>no less than 300 feet (500 feet for raptors), a smaller buffer may be</u> determined by a qualified biologist <del>in consultation with CDFW.</del> 'No-disturbance buffers' shall be maintained until the end of the breeding season or until a qualified wildlife biologist has determined that the nestlings have fledged. A qualified wildlife biologist shall inspect the active nest to determine whether construction activities are disturbing to the nesting birds or nestlings. If the qualified wildlife biologist determines that construction activities pose a disturbance to nesting, construction work shall be stopped in the area of the nest, and the 'no-disturbance buffer' expanded.</li> </ul> </li> </ul> |                      |        |                             |                                  |

## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

| Mitigation Measures   | Applicable Locations                 | Timing                                    | Monitoring/Reporting Action   | Responsible and Involved Parties   |
|---|--------------------------------------|---|---|--|
| <p><b>Mitigation Measure BIO-2: Prohibited Development in Sensitive Habitats</b></p> <p>Future development under the Specific Plan would be prohibited within any streams, riparian habitats, sensitive natural communities, or other water bodies in the project area. No future development would occur in the floodplain to protect sensitive natural communities and special-status species.</p>  | Any area within the project boundary | During future development                 | Future owners/developers ensure no future construction occurs within sensitive habitats           | <ul style="list-style-type: none"> <li>• Project Applicant</li> <li>• County</li> </ul>  |
| <p><b>Mitigation Measure BIO-3: Mitigation for Riparian Habitat <u>and/or Fish and Game Code Section 1602 Resources</u>.</b></p> <p>If construction activities impact riparian habitat <u>and/or Fish and Game Code Section 1602 resources</u>, the permanent loss of riparian habitat <u>and/or Fish and Game Code Section 1602 resources</u> shall be compensated through <u>either on-site restoration, purchase of mitigation bank credits from a CDFW approved mitigation bank, and/or land acquisition, management and conservation in perpetuity and funding thereof. enhancement or establishment of riparian habitat.</u> Permanent impacts to riparian habitat shall be compensated <u>at a ratio commensurate with the quality of habitat impacted and habitat created and the type of mitigation provided through enhancement of riparian areas at a minimum 2:1 ratio (enhancement:impact) or creation of riparian areas at a minimum 1:1 ratio.</u> All areas of temporary impact will be restored to preconstruction contours and habitat conditions. The applicant will prepare a habitat mitigation plan that includes:</p> <ul style="list-style-type: none"> <li>• Baseline conditions within the mitigation site</li> <li>• Proposed mitigation site conditions</li> <li>• Mitigation methods (e.g., habitat creation or enhancement)</li> <li>• Performance standards/success criteria including a minimum of 70% vegetated cover with native riparian vegetation that are the target of the creation and enhancement efforts and less than 3% invasive species cover</li> </ul> | Riparian Habitat                     | Prior to construction in riparian habitat | Annual monitoring and reporting post-mitigation for five years or until success criteria are met. | <ul style="list-style-type: none"> <li>• Applicant develops plan</li> <li>• Contractor hired by the applicant and approved by the County implements</li> <li>• County verifies mitigation completed</li> </ul> |

## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

| Mitigation Measures   | Applicable Locations   | Timing  | Monitoring/Reporting Action   | Responsible and Involved Parties   |
|---|--|---|---|--|
| <ul style="list-style-type: none"> <li>Habitat maintenance including trash removal, invasive weed removal, and repair of any damage to the mitigation site</li> <li>Monitoring requirements including annual monitoring during the establishment period. The annual monitoring will include surveys for native vegetation cover, photo documentation at defined photo-monitoring locations, and monitoring for invasive species and any other habitat stressors. Monitoring will be conducted for the first five years or until success criteria are met.</li> </ul>  |  |   |   |  |
| <p><b>Mitigation Measure Cultural Resources-1: Cultural Resources Preservation and Treatment</b></p> <p>Exclusion fencing shall be established and maintained around any eligible <b>and potentially eligible</b> cultural resources including a 100-foot buffer from the outer limits of any known surface deposits. The fencing shall be comprised of dark, non-reflective material intended for permanent use such as galvanized hog wire and shall be a minimum of 4 feet tall to ensure visibility and minimize unauthorized access. Signs stating “Environmentally Sensitive Area, Do Not Enter, Contact Mono County (760-924-1800) With Any Questions” shall be posted around the exclusion zone for avoidance. The exclusion zone avoidance fence and signs shall be maintained in perpetuity by current and future property owner(s). Alternatively, removal of the identified resource(s) may occur at the request of a Native American tribe for pre-historic resources or historical society for historic-era resources. The removed resources may be reburied at a location selected by the tribe or historical society at their request.</p> <p>If preservation-in-place and reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to the materials and confer with the tribe for pre-historic resources or historical society for historic-era resources to identify an American Association of Museums-accredited facility that can</p> | Any area within the project site where eligible or known cultural resources occur. | <p>Prior to construction</p> <hr/> <p>During construction</p> | <p>Fence a 100-foot ESA around all known cultural resource sites within the project area.</p> <hr/> <p>(1) Establish a 100-foot ESA around all eligible cultural resource sites,<br/>                     (2) post signage around the exclusion zone,<br/>                     (3) current and future property owners will maintain the exclusion zone,<br/>                     (4) Native American tribe may remove or rebury the resource,<br/>                     (5) if preservation or reburial are not an option for treatment, the landowner shall relinquish all ownership to the materials and</p> | <ul style="list-style-type: none"> <li>County</li> <li>Contractor</li> <li>Qualified archaeologist hired by the applicant and verified by the County.</li> </ul> |

## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

| Mitigation Measures  | Applicable Locations   | Timing                 | Monitoring/Reporting Action   | Responsible and Involved Parties   |
|--|--|------------------------|---|--|
| accept the materials into its permanent collections and provide proper care, in accordance with the 1993 California Curation Guidelines. A curation agreement with an appropriately qualified repository shall be developed between the landowner and museum that legally and physically transfers the materials and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the materials and associated records and the obligation of the project applicant to pay those fees.  |  |                        | confer with the tribe or historical society.  |  |
|  |  | Following construction | Remove fencing  |  |
| <p><b>Mitigation Measure Cultural Resources-2: Cultural Resources Monitoring</b></p> <p>A qualified archaeologist approved by the County shall be on-site to monitor all ground disturbing construction activities within 50 feet of any known cultural resource. If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall halt, the County shall be notified, and the discovery shall be evaluated in accordance with the requirements of Mitigation Measure CUL-2.</p>  | Any area within the project boundary where cultural resources are known to occur | During construction.   | A qualified archaeologist will monitor ground-disturbing activities within 50 feet of any known cultural resource.  | <ul style="list-style-type: none"> <li>• Qualified archaeologist hired by the applicant and approved by the County</li> <li>• County</li> </ul>                        |
| <p><b>Mitigation Measure Cultural Resources-3: Inadvertent Discovery of Archaeological Resources</b></p> <p>If evidence of any subsurface archaeological features or deposits are discovered during construction-related earth-moving activities, all ground-disturbing activity in the area of the discovery shall be halted within 50 feet of the find, and the finds shall be protected until they are examined by a qualified archaeologist approved by the County. Finds may include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; stone-milling equipment (e.g., mortars, pestles, handstones,</li> </ul> | Any area within the project boundary   | During construction    | <p>(1) Cease activity within 50 feet of the find,</p> <p>(2) evaluate and determine whether the resource is eligible, unique, or could be a tribal resource,</p> <p>(3) If the resource could be a tribal cultural resource, notify Native American tribe,</p> <p>(4) if a resource is considered historical, unique, or a tribal</p> | <ul style="list-style-type: none"> <li>• Contractor</li> <li>• County</li> <li>• Qualified archaeologist hired by the applicant and verified by the County.</li> </ul> |

## APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

| Mitigation Measures   | Applicable Locations | Timing                 | Monitoring/Reporting Action   | Responsible and Involved Parties   |
|---|----------------------|------------------------|---|--|
| <p>milling slabs); and battered stone tools, such as hammerstones and pitted stones.</p> <ul style="list-style-type: none"> <li>Historic-era materials might include building or structure footings and walls and deposits of metal, glass, and/or ceramic refuse.</li> </ul> <p>A qualified archaeologist who meets the U.S. Secretary of the Interiors professional qualifications in archaeology and is approved by the County shall be retained to assess the significance of the find and make recommendations for further evaluation and treatment as necessary. A Native American representative from a traditionally and culturally affiliated tribe will be notified and invited to assess the find if the artifacts are of Native American ancestry and determined to be more than an isolated find. If, after evaluation, a resource is considered a historical resource or unique archaeological resource (as defined in CEQA Guidelines Section 15064.5), or a tribal cultural resource (as defined in PRC Section 21074), all preservation options shall be considered as required by CEQA (see CEQA Guidelines Section 15126.4 and PRC 21084.3), including possible capping, data recovery, mapping, or avoidance of the resource. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work in the area may resume upon completion of treatment. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, analyzes and interprets the results, and distributes this information to the public except for information deemed confidential and protected under state law.</p> |                      |                        | <p>cultural resource, all preservation options will be considered, (5) work may resume upon completion of resource treatment.</p>     |  |
|   |                      | Following construction | Provide a public report of results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries. | <ul style="list-style-type: none"> <li>Qualified archaeologist hired by the applicant and verified by the County.</li> </ul> |

## Appendix B

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### **Air Quality and Greenhouse Gas Model Calculations**

**Emissions Summary**

| Type                      | Year | VOC    | NOx    | CO     | SO2     | PM10   | PM2.5  | CO2e |
|---------------------------|------|--------|--------|--------|---------|--------|--------|------|
| <b>Baseline tons/year</b> |      |        |        |        |         |        |        |      |
| Operation                 | 2021 | 0.0816 | 0.1306 | 0.2888 | 0.00051 | 0.2241 | 0.0385 | 34   |
| <b>Baseline lbs/day</b>   |      |        |        |        |         |        |        |      |
| Operation - Summer        | 2021 | 1.6367 | 0.7374 | 3.0875 | 0.00548 | 1.4765 | 0.4215 |      |

CO2e      MT/yr

| Cannabis Facility tons/year |             |                |                |                |               |                |               |           |
|-----------------------------|-------------|----------------|----------------|----------------|---------------|----------------|---------------|-----------|
| Construction                | 2022        | 0.3446         | 1.5566         | 1.6016         | 0.0030        | 0.1241         | 0.0875        | 255       |
| Operation                   | 2023        | 0.1938         | 0.0470         | 0.4716         | 0.00068       | 1.54730        | 0.1728        | 70        |
| Total Operation             |             |                |                |                |               |                |               | <b>44</b> |
| Exceed Threshold?           |             |                |                |                |               |                |               | No        |
| Cannabis Facility lbs/day   |             |                |                |                |               |                |               |           |
| <b>Construction</b>         | <b>2022</b> | <b>28.0992</b> | <b>19.0296</b> | <b>14.5449</b> | <b>0.0360</b> | <b>7.9533</b>  | <b>4.1422</b> |           |
| Exceed Threshold?           |             | No             | No             | No             | No            | No             | No            |           |
| Operation                   | 2023        | 2.0672         | 0.3079         | 3.8970         | 0.00743       | 11.6761        | 1.46720       |           |
| <b>Operation Total</b>      |             | <b>0.4305</b>  | <b>-0.4295</b> | <b>0.8095</b>  | <b>0.0020</b> | <b>10.1996</b> | <b>1.0457</b> |           |
| Exceed Threshold?           |             | No             | No             | No             | No            | No             | No            |           |

| Field Crops tons/year  |             |                |                |                |               |               |               |            |
|------------------------|-------------|----------------|----------------|----------------|---------------|---------------|---------------|------------|
| Construction           | 2024        | 0.4171         | 1.3485         | 1.5100         | 0.00218       | 0.0916        | 0.0669        | 237        |
| Operation              | 2025        | 0.4658         | 0.2980         | 1.1623         | 0.0021        | 0.1332        | 0.0746        | 167        |
| Crop Growing           |             |                |                |                |               |               |               | 427        |
| Total Operation        |             |                |                |                |               |               |               | <b>567</b> |
| Exceed Threshold?      |             |                |                |                |               |               |               | No         |
| Field Crops lbs/day    |             |                |                |                |               |               |               |            |
| <b>Construction</b>    | <b>2024</b> | <b>49.5537</b> | <b>14.2325</b> | <b>13.9410</b> | <b>0.0266</b> | <b>3.4518</b> | <b>3.9788</b> |            |
| Exceed Threshold?      |             | No             | No             | No             | No            | No            | No            |            |
| Operation              | 2025        | 7.1450         | 2.2054         | 12.4586        | 0.0239        | 1.6044        | 1.2579        |            |
| <b>Operation Total</b> |             | <b>5.5083</b>  | <b>1.4680</b>  | <b>9.3711</b>  | <b>0.0184</b> | <b>0.1279</b> | <b>0.8364</b> |            |
| Exceed Threshold?      |             | No             | No             | No             | No            | No            | No            |            |

| Livestock tons/year    |             |                |               |               |               |               |               |            |
|------------------------|-------------|----------------|---------------|---------------|---------------|---------------|---------------|------------|
| Construction           | 2024        | 0.1780         | 0.3657        | 0.4341        | 0.00076       | 0.0277        | 0.0195        | 68         |
| Operation              | 2025        | 0.4226         | 0.3692        | 1.0079        | 0.00200       | 0.1293        | 0.0755        | 153        |
| Livestock Rearing      |             |                |               |               |               |               |               | 137        |
| Total Operation        |             |                |               |               |               |               |               | <b>259</b> |
| Exceed Threshold?      |             |                |               |               |               |               |               | <b>No</b>  |
| Livestock lbs/day      |             |                |               |               |               |               |               |            |
| <b>Construction</b>    | <b>2024</b> | <b>56.2694</b> | <b>9.7515</b> | <b>7.9281</b> | <b>0.0159</b> | <b>5.8148</b> | <b>2.9642</b> |            |
| Exceed Threshold?      |             | No             | No            | No            | No            | No            | No            |            |
| Operation              | 2025        | 6.9298         | 2.7727        | 11.4179       | 0.0235        | 1.6037        | 1.2731        |            |
| <b>Operation Total</b> |             | <b>5.2931</b>  | <b>2.0353</b> | <b>8.3304</b> | <b>0.0180</b> | <b>0.1272</b> | <b>0.8516</b> |            |
| Exceed Threshold?      |             | No             | No            | No            | No            | No            | No            |            |

For purposes of this analysis VOC emissions are assumed to be equal to ROG.

| Type                                     | Year | VOC | NOx | CO  | Sox | PM10 | PM2.5 | CO2e |
|--|------|-----|-----|-----|-----|------|-------|------|
| <b>SCAQMD Emission Threshold lbs/day</b> |      |     |     |     |     |      |       |      |
| Construction                             |      | 75  | 100 | 550 | 150 | 150  | 55    |      |
| Operation                                |      | 55  | 55  | 550 | 150 | 150  | 55    |      |

pound      1  
Ton      0.0005

Apogee-Baseline - Great Basin UAPCD Air District, Annual

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

**Apogee-Baseline  
Great Basin UAPCD Air District, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

| Land Uses        | Size | Metric        | Lot Acreage | Floor Surface Area | Population |
|------------------|------|---------------|-------------|--------------------|------------|
| Mobile Home Park | 1.00 | Dwelling Unit | 0.13        | 176.00             | 1          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          |                                |       | <b>Operational Year</b>          | 2023  |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

- Project Characteristics -
- Land Use - Existing trailer on-site.
- Construction Phase - No Construction.
- Off-road Equipment - No Construction.
- Grading - No Construction.
- Demolition - No Construction.
- Trips and VMT - No Construction.
- On-road Fugitive Dust - No Construction.
- Architectural Coating - No Construction.
- Fleet Mix -
- Road Dust - The project site is unpaved and accounts for 3% of the traffic trip.
- Area Coating -



## Apogee-Baseline - Great Basin UAPCD Air District, Annual

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

Energy Use - Project applicant is living off-grid.

Operational Off-Road Equipment - Generator information is provided by project applicant.

| Table Name                     | Column Name                    | Default Value | New Value |
|--------------------------------|--------------------------------|---------------|-----------|
| tblArchitecturalCoating        | ConstArea_Residential_Exterior | 119.00        | 0.00      |
| tblArchitecturalCoating        | ConstArea_Residential_Interior | 356.00        | 0.00      |
| tblArchitecturalCoating        | EF_Nonresidential_Exterior     | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Nonresidential_Interior     | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Parking                     | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Residential_Exterior        | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Residential_Interior        | 250.00        | 0.00      |
| tblConstructionPhase           | NumDays                        | 5.00          | 0.00      |
| tblConstructionPhase           | NumDays                        | 100.00        | 0.00      |
| tblConstructionPhase           | NumDays                        | 10.00         | 0.00      |
| tblConstructionPhase           | NumDays                        | 2.00          | 0.00      |
| tblConstructionPhase           | NumDays                        | 5.00          | 0.00      |
| tblConstructionPhase           | NumDays                        | 1.00          | 0.00      |
| tblEnergyUse                   | LightingElect                  | 1,038.60      | 0.00      |
| tblEnergyUse                   | NT24E                          | 4,004.74      | 0.00      |
| tblEnergyUse                   | NT24NG                         | 1,599.00      | 0.00      |
| tblEnergyUse                   | T24E                           | 146.59        | 0.00      |
| tblEnergyUse                   | T24NG                          | 2,444.32      | 0.00      |
| tblLandUse                     | LandUseSquareFeet              | 1,200.00      | 176.00    |
| tblLandUse                     | Population                     | 3.00          | 1.00      |
| tblOperationalOffRoadEquipment | OperDaysPerYear                | 260.00        | 365.00    |
| tblOperationalOffRoadEquipment | OperHoursPerDay                | 8.00          | 2.00      |
| tblOperationalOffRoadEquipment | OperOffRoadEquipmentNumber     | 0.00          | 1.00      |
| tblProjectCharacteristics      | UrbanizationLevel              | Urban         | Rural     |
| tblRoadDust                    | RoadPercentPave                | 100           | 97        |



Apogee-Baseline - Great Basin UAPCD Air District, Annual

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

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

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---------|------------|----------|--|--|
|         |            | Highest  |  |  |

**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         | 0.0639        | 1.3100e-003   | 0.0849        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4453         | 1.4783         | 9.6000e-004   | 8.0000e-005        | 1.5266         |
| Energy       | 0.0000        | 0.0000        | 0.0000        | 0.0000             |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000         | 0.0000         | 0.0000        | 0.0000             | 0.0000         |
| Mobile       | 3.7400e-003   | 5.3500e-003   | 0.0365        | 7.0000e-005        | 0.2073        | 6.0000e-005   | 0.2073        | 0.0217         | 6.0000e-005   | 0.0218        | 0.0000        | 6.3869         | 6.3869         | 4.2000e-004   | 3.1000e-004        | 6.4899         |
| Offroad      | 0.0140        | 0.1239        | 0.1674        | 3.0000e-004        |               | 5.8500e-003   | 5.8500e-003   |                | 5.8500e-003   | 5.8500e-003   | 0.0000        | 25.7876        | 25.7876        | 1.1300e-003   | 0.0000             | 25.8159        |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0934        | 0.0000         | 0.0934         | 5.5200e-003   | 0.0000             | 0.2313         |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0207        | 0.0880         | 0.1087         | 2.1300e-003   | 5.0000e-005        | 0.1772         |
| <b>Total</b> | <b>0.0816</b> | <b>0.1306</b> | <b>0.2888</b> | <b>5.1000e-004</b> | <b>0.2073</b> | <b>0.0168</b> | <b>0.2241</b> | <b>0.0217</b>  | <b>0.0168</b> | <b>0.0385</b> | <b>1.1470</b> | <b>32.7078</b> | <b>33.8548</b> | <b>0.0102</b> | <b>4.4000e-004</b> | <b>34.2409</b> |

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2      | Total CO2      | CH4           | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|----------------|----------------|---------------|--------------------|----------------|
| Category     | tons/yr       |               |               |                    |               |               |               |                |               |               | MT/yr         |                |                |               |                    |                |
| Area         | 0.0639        | 1.3100e-003   | 0.0849        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4453         | 1.4783         | 9.6000e-004   | 8.0000e-005        | 1.5266         |
| Energy       | 0.0000        | 0.0000        | 0.0000        | 0.0000             |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000         | 0.0000         | 0.0000        | 0.0000             | 0.0000         |
| Mobile       | 3.7400e-003   | 5.3500e-003   | 0.0365        | 7.0000e-005        | 0.2073        | 6.0000e-005   | 0.2073        | 0.0217         | 6.0000e-005   | 0.0218        | 0.0000        | 6.3869         | 6.3869         | 4.2000e-004   | 3.1000e-004        | 6.4899         |
| Offroad      | 0.0140        | 0.1239        | 0.1674        | 3.0000e-004        |               | 5.8500e-003   | 5.8500e-003   |                | 5.8500e-003   | 5.8500e-003   | 0.0000        | 25.7876        | 25.7876        | 1.1300e-003   | 0.0000             | 25.8159        |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0934        | 0.0000         | 0.0934         | 5.5200e-003   | 0.0000             | 0.2313         |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0207        | 0.0880         | 0.1087         | 2.1300e-003   | 5.0000e-005        | 0.1772         |
| <b>Total</b> | <b>0.0816</b> | <b>0.1306</b> | <b>0.2888</b> | <b>5.1000e-004</b> | <b>0.2073</b> | <b>0.0168</b> | <b>0.2241</b> | <b>0.0217</b>  | <b>0.0168</b> | <b>0.0385</b> | <b>1.1470</b> | <b>32.7078</b> | <b>33.8548</b> | <b>0.0102</b> | <b>4.4000e-004</b> | <b>34.2409</b> |

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

**3.0 Construction Detail**

**Construction Phase**

| Phase Number | Phase Name       | Phase Type       | Start Date | End Date  | Num Days Week | Num Days | Phase Description |
|--------------|------------------|------------------|------------|-----------|---------------|----------|-------------------|
| 1            | Demolition       | Demolition       | 7/26/2021  | 7/25/2021 | 5             | 0        |                   |
| 2            | Site Preparation | Site Preparation | 8/7/2021   | 8/6/2021  | 5             | 0        |                   |

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

|   |                       |                       |            |            |   |   |
|---|-----------------------|-----------------------|------------|------------|---|---|
| 3 | Grading               | Grading               | 8/10/2021  | 8/9/2021   | 5 | 0 |
| 4 | Building Construction | Building Construction | 8/12/2021  | 8/11/2021  | 5 | 0 |
| 5 | Paving                | Paving                | 12/30/2021 | 12/29/2021 | 5 | 0 |
| 6 | Architectural Coating | Architectural Coating | 1/6/2022   | 1/5/2022   | 5 | 0 |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|------------|------------------------|--------|-------------|-------------|-------------|
|------------|------------------------|--------|-------------|-------------|-------------|

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Site Preparation      |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Grading               |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Building Construction |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Paving                |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Architectural Coating |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |

**3.1 Mitigation Measures Construction**





























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

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

|             | ROG         | NOx         | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------|-------------|-------------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category    | tons/yr     |             |        |             |               |              |            |                |               |             | MT/yr    |           |           |             |             |        |
| Mitigated   | 3.7400e-003 | 5.3500e-003 | 0.0365 | 7.0000e-005 | 0.2073        | 6.0000e-005  | 0.2073     | 0.0217         | 6.0000e-005   | 0.0218      | 0.0000   | 6.3869    | 6.3869    | 4.2000e-004 | 3.1000e-004 | 6.4899 |
| Unmitigated | 3.7400e-003 | 5.3500e-003 | 0.0365 | 7.0000e-005 | 0.2073        | 6.0000e-005  | 0.2073     | 0.0217         | 6.0000e-005   | 0.0218      | 0.0000   | 6.3869    | 6.3869    | 4.2000e-004 | 3.1000e-004 | 6.4899 |

4.2 Trip Summary Information

| Land Use         | Average Daily Trip Rate |          |        | Unmitigated | Mitigated  |
|------------------|-------------------------|----------|--------|-------------|------------|
|                  | Weekday                 | Saturday | Sunday | Annual VMT  | Annual VMT |
| Mobile Home Park | 5.00                    | 4.61     | 4.24   | 17,983      | 17,983     |
| Total            | 5.00                    | 4.61     | 4.24   | 17,983      | 17,983     |

4.3 Trip Type Information

| Land Use         | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                  | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| Mobile Home Park | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |

4.4 Fleet Mix

| Land Use         | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Mobile Home Park | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |





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

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

|                  | Electricity Use | Total CO2     | CH4           | N2O           | CO2e          |
|------------------|-----------------|---------------|---------------|---------------|---------------|
| Land Use         | kWh/yr          | MT/yr         |               |               |               |
| Mobile Home Park | 0               | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| <b>Total</b>     |                 | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |

**Mitigated**

|                  | Electricity Use | Total CO2     | CH4           | N2O           | CO2e          |
|------------------|-----------------|---------------|---------------|---------------|---------------|
| Land Use         | kWh/yr          | MT/yr         |               |               |               |
| Mobile Home Park | 0               | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| <b>Total</b>     |                 | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

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

|             | ROG     | NOx         | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------|---------|-------------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category    | tons/yr |             |        |             |               |              |            |                |               |             | MT/yr    |           |           |             |             |        |
| Mitigated   | 0.0639  | 1.3100e-003 | 0.0849 | 1.4000e-004 |               | 0.0109       | 0.0109     |                | 0.0109        | 0.0109      | 1.0330   | 0.4453    | 1.4783    | 9.6000e-004 | 8.0000e-005 | 1.5266 |
| Unmitigated | 0.0639  | 1.3100e-003 | 0.0849 | 1.4000e-004 |               | 0.0109       | 0.0109     |                | 0.0109        | 0.0109      | 1.0330   | 0.4453    | 1.4783    | 9.6000e-004 | 8.0000e-005 | 1.5266 |

**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 | 2.8000e-004   |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 6.9000e-004   |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.0628        | 1.2300e-003        | 0.0775        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4332        | 1.4662        | 9.5000e-004        | 8.0000e-005        | 1.5142        |
| Landscaping           | 2.2000e-004   | 9.0000e-005        | 7.4300e-003   | 0.0000             |               | 4.0000e-005   | 4.0000e-005   |                | 4.0000e-005   | 4.0000e-005   | 0.0000        | 0.0121        | 0.0121        | 1.0000e-005        | 0.0000             | 0.0124        |
| <b>Total</b>          | <b>0.0639</b> | <b>1.3200e-003</b> | <b>0.0849</b> | <b>1.4000e-004</b> |               | <b>0.0109</b> | <b>0.0109</b> |                | <b>0.0109</b> | <b>0.0109</b> | <b>1.0330</b> | <b>0.4453</b> | <b>1.4783</b> | <b>9.6000e-004</b> | <b>8.0000e-005</b> | <b>1.5266</b> |

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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O                | CO2e          |
|-----------------------|---------------|--------------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|--------------------|--------------------|---------------|
| SubCategory           | tons/yr       |                    |               |                    |               |               |               |                |               |               | MT/yr         |               |               |                    |                    |               |
| Architectural Coating | 2.8000e-004   |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 6.9000e-004   |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.0628        | 1.2300e-003        | 0.0775        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4332        | 1.4662        | 9.5000e-004        | 8.0000e-005        | 1.5142        |
| Landscaping           | 2.2000e-004   | 9.0000e-005        | 7.4300e-003   | 0.0000             |               | 4.0000e-005   | 4.0000e-005   |                | 4.0000e-005   | 4.0000e-005   | 0.0000        | 0.0121        | 0.0121        | 1.0000e-005        | 0.0000             | 0.0124        |
| <b>Total</b>          | <b>0.0639</b> | <b>1.3200e-003</b> | <b>0.0849</b> | <b>1.4000e-004</b> |               | <b>0.0109</b> | <b>0.0109</b> |                | <b>0.0109</b> | <b>0.0109</b> | <b>1.0330</b> | <b>0.4453</b> | <b>1.4783</b> | <b>9.6000e-004</b> | <b>8.0000e-005</b> | <b>1.5266</b> |

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

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

|             | Total CO2 | CH4         | N2O         | CO2e   |
|-------------|-----------|-------------|-------------|--------|
| Category    | MT/yr     |             |             |        |
| Mitigated   | 0.1087    | 2.1300e-003 | 5.0000e-005 | 0.1772 |
| Unmitigated | 0.1087    | 2.1300e-003 | 5.0000e-005 | 0.1772 |

**7.2 Water by Land Use**

**Unmitigated**

|                  | Indoor/Outdoor Use   | Total CO2     | CH4                | N2O                | CO2e          |
|------------------|----------------------|---------------|--------------------|--------------------|---------------|
| Land Use         | Mgal                 | MT/yr         |                    |                    |               |
| Mobile Home Park | 0.065154 / 0.0410754 | 0.1087        | 2.1300e-003        | 5.0000e-005        | 0.1772        |
| <b>Total</b>     |                      | <b>0.1087</b> | <b>2.1300e-003</b> | <b>5.0000e-005</b> | <b>0.1772</b> |



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

**7.2 Water by Land Use**

**Mitigated**

|                  | Indoor/Outdoor Use   | Total CO2     | CH4                | N2O                | CO2e          |
|------------------|----------------------|---------------|--------------------|--------------------|---------------|
| Land Use         | Mgal                 | MT/yr         |                    |                    |               |
| Mobile Home Park | 0.065154 / 0.0410754 | 0.1087        | 2.1300e-003        | 5.0000e-005        | 0.1772        |
| <b>Total</b>     |                      | <b>0.1087</b> | <b>2.1300e-003</b> | <b>5.0000e-005</b> | <b>0.1772</b> |

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**Category/Year**

|             | Total CO2 | CH4         | N2O    | CO2e   |
|-------------|-----------|-------------|--------|--------|
|             | MT/yr     |             |        |        |
| Mitigated   | 0.0934    | 5.5200e-003 | 0.0000 | 0.2313 |
| Unmitigated | 0.0934    | 5.5200e-003 | 0.0000 | 0.2313 |

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

**8.2 Waste by Land Use**

**Unmitigated**

|                  | Waste Disposed | Total CO2     | CH4                | N2O           | CO2e          |
|------------------|----------------|---------------|--------------------|---------------|---------------|
| Land Use         | tons           | MT/yr         |                    |               |               |
| Mobile Home Park | 0.46           | 0.0934        | 5.5200e-003        | 0.0000        | 0.2313        |
| <b>Total</b>     |                | <b>0.0934</b> | <b>5.5200e-003</b> | <b>0.0000</b> | <b>0.2313</b> |

**Mitigated**

|                  | Waste Disposed | Total CO2     | CH4                | N2O           | CO2e          |
|------------------|----------------|---------------|--------------------|---------------|---------------|
| Land Use         | tons           | MT/yr         |                    |               |               |
| Mobile Home Park | 0.46           | 0.0934        | 5.5200e-003        | 0.0000        | 0.2313        |
| <b>Total</b>     |                | <b>0.0934</b> | <b>5.5200e-003</b> | <b>0.0000</b> | <b>0.2313</b> |

**9.0 Operational Offroad**

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|----------------|--------|-----------|-----------|-------------|-------------|-----------|
| Generator Sets | 1      | 2.00      | 365       | 84          | 0.74        | Diesel    |

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

**UnMitigated/Mitigated**

|                | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total         | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2      | Total CO2      | CH4                | N2O           | CO2e           |
|----------------|---------------|---------------|---------------|--------------------|---------------|--------------------|--------------------|----------------|--------------------|--------------------|---------------|----------------|----------------|--------------------|---------------|----------------|
| Equipment Type | tons/yr       |               |               |                    |               |                    |                    |                |                    |                    | MT/yr         |                |                |                    |               |                |
| Generator Sets | 0.0140        | 0.1239        | 0.1674        | 3.0000e-004        |               | 5.8500e-003        | 5.8500e-003        |                | 5.8500e-003        | 5.8500e-003        | 0.0000        | 25.7876        | 25.7876        | 1.1300e-003        | 0.0000        | 25.8159        |
| <b>Total</b>   | <b>0.0140</b> | <b>0.1239</b> | <b>0.1674</b> | <b>3.0000e-004</b> |               | <b>5.8500e-003</b> | <b>5.8500e-003</b> |                | <b>5.8500e-003</b> | <b>5.8500e-003</b> | <b>0.0000</b> | <b>25.7876</b> | <b>25.7876</b> | <b>1.1300e-003</b> | <b>0.0000</b> | <b>25.8159</b> |

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

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

**Boilers**

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

**11.0 Vegetation**

Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**Apogee-Baseline  
Great Basin UAPCD Air District, Summer**

**1.0 Project Characteristics**

---

**1.1 Land Usage**

| Land Uses        | Size | Metric        | Lot Acreage | Floor Surface Area | Population |
|------------------|------|---------------|-------------|--------------------|------------|
| Mobile Home Park | 1.00 | Dwelling Unit | 0.13        | 176.00             | 1          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          |                                |       | <b>Operational Year</b>          | 2023  |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

- Project Characteristics -
- Land Use - Existing trailer on-site.
- Construction Phase - No Construction.
- Off-road Equipment - No Construction.
- Grading - No Construction.
- Demolition - No Construction.
- Trips and VMT - No Construction.
- On-road Fugitive Dust - No Construction.
- Architectural Coating - No Construction.
- Fleet Mix -
- Road Dust - The project site is unpaved and accounts for 3% of the traffic trip.
- Area Coating -

## Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

Energy Use - Project applicant is living off-grid.

Operational Off-Road Equipment - Generator information is provided by project applicant.

| Table Name                     | Column Name                    | Default Value | New Value |
|--------------------------------|--------------------------------|---------------|-----------|
| tblArchitecturalCoating        | ConstArea_Residential_Exterior | 119.00        | 0.00      |
| tblArchitecturalCoating        | ConstArea_Residential_Interior | 356.00        | 0.00      |
| tblArchitecturalCoating        | EF_Nonresidential_Exterior     | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Nonresidential_Interior     | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Parking                     | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Residential_Exterior        | 250.00        | 0.00      |
| tblArchitecturalCoating        | EF_Residential_Interior        | 250.00        | 0.00      |
| tblConstructionPhase           | NumDays                        | 5.00          | 0.00      |
| tblConstructionPhase           | NumDays                        | 100.00        | 0.00      |
| tblConstructionPhase           | NumDays                        | 10.00         | 0.00      |
| tblConstructionPhase           | NumDays                        | 2.00          | 0.00      |
| tblConstructionPhase           | NumDays                        | 5.00          | 0.00      |
| tblConstructionPhase           | NumDays                        | 1.00          | 0.00      |
| tblEnergyUse                   | LightingElect                  | 1,038.60      | 0.00      |
| tblEnergyUse                   | NT24E                          | 4,004.74      | 0.00      |
| tblEnergyUse                   | NT24NG                         | 1,599.00      | 0.00      |
| tblEnergyUse                   | T24E                           | 146.59        | 0.00      |
| tblEnergyUse                   | T24NG                          | 2,444.32      | 0.00      |
| tblLandUse                     | LandUseSquareFeet              | 1,200.00      | 176.00    |
| tblLandUse                     | Population                     | 3.00          | 1.00      |
| tblOperationalOffRoadEquipment | OperDaysPerYear                | 260.00        | 365.00    |
| tblOperationalOffRoadEquipment | OperHoursPerDay                | 8.00          | 2.00      |
| tblOperationalOffRoadEquipment | OperOffRoadEquipmentNumber     | 0.00          | 1.00      |
| tblProjectCharacteristics      | UrbanizationLevel              | Urban         | Rural     |
| tblRoadDust                    | RoadPercentPave                | 100           | 97        |



Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

|                   | ROG  | NOx  | CO   | SO2  | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4  | N2O  | CO2e |
|-------------------|------|------|------|------|---------------|--------------|------------|----------------|---------------|-------------|----------|----------|-----------|------|------|------|
| 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     | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day         |                 |                 |               |                    |                 |
| Area         | 1.5382        | 0.0308        | 1.9716        | 3.4300e-003        |               | 0.2653        | 0.2653        |                | 0.2653        | 0.2653        | 27.7717        | 11.7956         | 39.5673         | 0.0258        | 2.1800e-003        | 40.8626         |
| Energy       | 0.0000        | 0.0000        | 0.0000        | 0.0000             |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                | 0.0000          | 0.0000          | 0.0000        | 0.0000             | 0.0000          |
| Mobile       | 0.0221        | 0.0276        | 0.1985        | 4.1000e-004        | 1.1787        | 3.6000e-004   | 1.1791        | 0.1238         | 3.4000e-004   | 0.1241        |                | 41.2724         | 41.2724         | 2.4500e-003   | 1.8200e-003        | 41.8757         |
| Offroad      | 0.0765        | 0.6789        | 0.9173        | 1.6400e-003        |               | 0.0321        | 0.0321        |                | 0.0321        | 0.0321        | 0.0000         | 155.7586        | 155.7586        | 6.8500e-003   |                    | 155.9299        |
| <b>Total</b> | <b>1.6367</b> | <b>0.7374</b> | <b>3.0875</b> | <b>5.4800e-003</b> | <b>1.1787</b> | <b>0.2978</b> | <b>1.4765</b> | <b>0.1238</b>  | <b>0.2977</b> | <b>0.4215</b> | <b>27.7717</b> | <b>208.8266</b> | <b>236.5984</b> | <b>0.0351</b> | <b>4.0000e-003</b> | <b>238.6682</b> |

Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2       | NBio- CO2       | Total CO2       | CH4           | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|----------------|-----------------|-----------------|---------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day         |                 |                 |               |                    |                 |
| Area         | 1.5382        | 0.0308        | 1.9716        | 3.4300e-003        |               | 0.2653        | 0.2653        |                | 0.2653        | 0.2653        | 27.7717        | 11.7956         | 39.5673         | 0.0258        | 2.1800e-003        | 40.8626         |
| Energy       | 0.0000        | 0.0000        | 0.0000        | 0.0000             |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                | 0.0000          | 0.0000          | 0.0000        | 0.0000             | 0.0000          |
| Mobile       | 0.0221        | 0.0276        | 0.1985        | 4.1000e-004        | 1.1787        | 3.6000e-004   | 1.1791        | 0.1238         | 3.4000e-004   | 0.1241        |                | 41.2724         | 41.2724         | 2.4500e-003   | 1.8200e-003        | 41.8757         |
| Offroad      | 0.0765        | 0.6789        | 0.9173        | 1.6400e-003        |               | 0.0321        | 0.0321        |                | 0.0321        | 0.0321        | 0.0000         | 155.7586        | 155.7586        | 6.8500e-003   |                    | 155.9299        |
| <b>Total</b> | <b>1.6367</b> | <b>0.7374</b> | <b>3.0875</b> | <b>5.4800e-003</b> | <b>1.1787</b> | <b>0.2978</b> | <b>1.4765</b> | <b>0.1238</b>  | <b>0.2977</b> | <b>0.4215</b> | <b>27.7717</b> | <b>208.8266</b> | <b>236.5984</b> | <b>0.0351</b> | <b>4.0000e-003</b> | <b>238.6682</b> |

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

**3.0 Construction Detail**

**Construction Phase**

| Phase Number | Phase Name            | Phase Type            | Start Date | End Date  | Num Days Week | Num Days | Phase Description |
|--------------|-----------------------|-----------------------|------------|-----------|---------------|----------|-------------------|
| 1            | Demolition            | Demolition            | 7/26/2021  | 7/25/2021 | 5             | 0        |                   |
| 2            | Site Preparation      | Site Preparation      | 8/7/2021   | 8/6/2021  | 5             | 0        |                   |
| 3            | Grading               | Grading               | 8/10/2021  | 8/9/2021  | 5             | 0        |                   |
| 4            | Building Construction | Building Construction | 8/12/2021  | 8/11/2021 | 5             | 0        |                   |



Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

|   |                       |                       |            |            |   |   |
|---|-----------------------|-----------------------|------------|------------|---|---|
| 5 | Paving                | Paving                | 12/30/2021 | 12/29/2021 | 5 | 0 |
| 6 | Architectural Coating | Architectural Coating | 1/6/2022   | 1/5/2022   | 5 | 0 |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|------------|------------------------|--------|-------------|-------------|-------------|
|------------|------------------------|--------|-------------|-------------|-------------|

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Site Preparation      |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Grading               |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Building Construction |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Paving                |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |
| Architectural Coating |                         |                    | 0.00               | 0.00                | 16.80              | 6.60               |                     |                      |                      |                       |

**3.1 Mitigation Measures Construction**



























Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

|             | ROG    | NOx    | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e    |
|-------------|--------|--------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|---------|
| Category    | lb/day |        |        |             |               |              |            |                |               |             | lb/day   |           |           |             |             |         |
| Mitigated   | 0.0221 | 0.0276 | 0.1985 | 4.1000e-004 | 1.1787        | 3.6000e-004  | 1.1791     | 0.1238         | 3.4000e-004   | 0.1241      |          | 41.2724   | 41.2724   | 2.4500e-003 | 1.8200e-003 | 41.8757 |
| Unmitigated | 0.0221 | 0.0276 | 0.1985 | 4.1000e-004 | 1.1787        | 3.6000e-004  | 1.1791     | 0.1238         | 3.4000e-004   | 0.1241      |          | 41.2724   | 41.2724   | 2.4500e-003 | 1.8200e-003 | 41.8757 |

**4.2 Trip Summary Information**

| Land Use         | Average Daily Trip Rate |          |        | Unmitigated | Mitigated  |
|------------------|-------------------------|----------|--------|-------------|------------|
|                  | Weekday                 | Saturday | Sunday | Annual VMT  | Annual VMT |
| Mobile Home Park | 5.00                    | 4.61     | 4.24   | 17,983      | 17,983     |
| Total            | 5.00                    | 4.61     | 4.24   | 17,983      | 17,983     |

**4.3 Trip Type Information**

| Land Use         | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                  | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| Mobile Home Park | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |

**4.4 Fleet Mix**

| Land Use         | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Mobile Home Park | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |

Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

|                        | ROG    | NOx    | CO     | SO2    | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4    | N2O    | CO2e   |
|------------------------|--------|--------|--------|--------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|--------|--------|--------|
| Category               | lb/day |        |        |        |               |              |            |                |               |             | lb/day   |           |           |        |        |        |
| NaturalGas Mitigated   | 0.0000 | 0.0000 | 0.0000 | 0.0000 |               | 0.0000       | 0.0000     |                | 0.0000        | 0.0000      |          | 0.0000    | 0.0000    | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |               | 0.0000       | 0.0000     |                | 0.0000        | 0.0000      |          | 0.0000    | 0.0000    | 0.0000 | 0.0000 | 0.0000 |

**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        | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |               |               |               |               |      |
| Mobile Home Park | 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        |      |
| <b>Total</b>     |                | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |               | <b>0.0000</b> | <b>0.0000</b> |                | <b>0.0000</b> | <b>0.0000</b> |          | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |      |

Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**5.2 Energy by Land Use - NaturalGas**

**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        | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |               |               |               |               |               |
| Mobile Home Park | 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        |
| <b>Total</b>     |                | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |               | <b>0.0000</b> | <b>0.0000</b> |                | <b>0.0000</b> | <b>0.0000</b> |          | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |

**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    | lb/day |        |        |             |               |              |            |                |               |             | lb/day   |           |           |        |             |         |
| Mitigated   | 1.5382 | 0.0308 | 1.9716 | 3.4300e-003 |               | 0.2653       | 0.2653     |                | 0.2653        | 0.2653      | 27.7717  | 11.7956   | 39.5673   | 0.0258 | 2.1800e-003 | 40.8626 |
| Unmitigated | 1.5382 | 0.0308 | 1.9716 | 3.4300e-003 |               | 0.2653       | 0.2653     |                | 0.2653        | 0.2653      | 27.7717  | 11.7956   | 39.5673   | 0.0258 | 2.1800e-003 | 40.8626 |



Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**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           | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day         |                |                |               |                    |                |
| Architectural Coating | 1.5100e-003   |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Consumer Products     | 3.7700e-003   |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Hearth                | 1.5304        | 0.0299        | 1.8891        | 3.4200e-003        |               | 0.2649        | 0.2649        |                | 0.2649        | 0.2649        | 27.7717        | 11.6471        | 39.4188        | 0.0256        | 2.1800e-003        | 40.7105        |
| Landscaping           | 2.4900e-003   | 9.5000e-004   | 0.0825        | 0.0000             |               | 4.6000e-004   | 4.6000e-004   |                | 4.6000e-004   | 4.6000e-004   |                | 0.1486         | 0.1486         | 1.4000e-004   |                    | 0.1521         |
| <b>Total</b>          | <b>1.5382</b> | <b>0.0308</b> | <b>1.9716</b> | <b>3.4200e-003</b> |               | <b>0.2653</b> | <b>0.2653</b> |                | <b>0.2653</b> | <b>0.2653</b> | <b>27.7717</b> | <b>11.7956</b> | <b>39.5673</b> | <b>0.0258</b> | <b>2.1800e-003</b> | <b>40.8626</b> |

Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2       | NBio- CO2      | Total CO2      | CH4           | N2O                | CO2e           |
|-----------------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|----------------|----------------|----------------|---------------|--------------------|----------------|
| SubCategory           | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day         |                |                |               |                    |                |
| Architectural Coating | 1.5100e-003   |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Consumer Products     | 3.7700e-003   |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Hearth                | 1.5304        | 0.0299        | 1.8891        | 3.4200e-003        |               | 0.2649        | 0.2649        |                | 0.2649        | 0.2649        | 27.7717        | 11.6471        | 39.4188        | 0.0256        | 2.1800e-003        | 40.7105        |
| Landscaping           | 2.4900e-003   | 9.5000e-004   | 0.0825        | 0.0000             |               | 4.6000e-004   | 4.6000e-004   |                | 4.6000e-004   | 4.6000e-004   |                | 0.1486         | 0.1486         | 1.4000e-004   |                    | 0.1521         |
| <b>Total</b>          | <b>1.5382</b> | <b>0.0308</b> | <b>1.9716</b> | <b>3.4200e-003</b> |               | <b>0.2653</b> | <b>0.2653</b> |                | <b>0.2653</b> | <b>0.2653</b> | <b>27.7717</b> | <b>11.7956</b> | <b>39.5673</b> | <b>0.0258</b> | <b>2.1800e-003</b> | <b>40.8626</b> |

**7.0 Water Detail**

**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|----------------|--------|-----------|-----------|-------------|-------------|-----------|
| Generator Sets | 1      | 2.00      | 365       | 84          | 0.74        | Diesel    |

Apogee-Baseline - Great Basin UAPCD Air District, Summer

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

**UnMitigated/Mitigated**

|                | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4                | N2O | CO2e            |
|----------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|--------------------|-----|-----------------|
| Equipment Type | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day        |                 |                 |                    |     |                 |
| Generator Sets | 0.0765        | 0.6789        | 0.9173        | 1.6400e-003        |               | 0.0321        | 0.0321        |                | 0.0321        | 0.0321        | 0.0000        | 155.7586        | 155.7586        | 6.8500e-003        |     | 155.9299        |
| <b>Total</b>   | <b>0.0765</b> | <b>0.6789</b> | <b>0.9173</b> | <b>1.6400e-003</b> |               | <b>0.0321</b> | <b>0.0321</b> |                | <b>0.0321</b> | <b>0.0321</b> | <b>0.0000</b> | <b>155.7586</b> | <b>155.7586</b> | <b>6.8500e-003</b> |     | <b>155.9299</b> |

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

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

**Boilers**

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

**11.0 Vegetation**

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**Apogee Farms - Cannabis Facility  
Great Basin UAPCD Air District, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

| Land Uses                        | Size  | Metric        | Lot Acreage | Floor Surface Area | Population |
|----------------------------------|-------|---------------|-------------|--------------------|------------|
| General Light Industry           | 10.44 | 1000sqft      | 0.24        | 10,440.00          | 0          |
| Unrefrigerated Warehouse-No Rail | 0.32  | 1000sqft      | 0.01        | 320.00             | 0          |
| Other Non-Asphalt Surfaces       | 34.30 | 1000sqft      | 0.79        | 34,300.00          | 0          |
| Mobile Home Park                 | 1.00  | Dwelling Unit | 0.13        | 176.00             | 1          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          |                                |       | <b>Operational Year</b>          | 2023  |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

Project Characteristics -

Land Use - General Light Industry - Cannabis Facility; Warehouse - Storage House; Non-Asphalt Surfaces - Access and Parking Improvement; Mobile Home Park - Trailer.

Grading - Gravel will be imported to site for access and parking improvement.

Demolition -

Trips and VMT - Processing facility hauling trip - 1 trip per 150 square feet of construction, 1 trip per greenhouse, 1 trip for septic tank.

Vehicle Trips - Cannabis activity trip rate is provided by project applicant.

Road Dust - The project site will be gravelled and accounts for 3% of the traffic trip length.

Water And Wastewater - Cannabis activity water use information is provided by project applicant.

## Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

Solid Waste - Warehouse = storage house

Stationary Sources - Emergency Generators and Fire Pumps - 50 hours/year is required for back-up generator maintenance.

Construction Off-road Equipment Mitigation -

| Table Name                      | Column Name              | Default Value | New Value |
|---------------------------------|--------------------------|---------------|-----------|
| tblGrading                      | MaterialImported         | 0.00          | 600.00    |
| tblLandUse                      | LandUseSquareFeet        | 1,200.00      | 176.00    |
| tblLandUse                      | Population               | 3.00          | 1.00      |
| tblProjectCharacteristics       | UrbanizationLevel        | Urban         | Rural     |
| tblRoadDust                     | RoadPercentPave          | 100           | 97        |
| tblSolidWaste                   | SolidWasteGenerationRate | 0.30          | 0.00      |
| tblStationaryGeneratorsPumpsUse | HorsePowerValue          | 0.00          | 202.00    |
| tblStationaryGeneratorsPumpsUse | HoursPerYear             | 0.00          | 50.00     |
| tblStationaryGeneratorsPumpsUse | NumberOfEquipment        | 0.00          | 1.00      |
| tblTripsAndVMT                  | HaulingTripNumber        | 0.00          | 19.00     |
| tblTripsAndVMT                  | WorkerTripNumber         | 20.00         | 19.00     |
| tblVehicleTrips                 | ST_TR                    | 1.99          | 0.00      |
| tblVehicleTrips                 | ST_TR                    | 1.74          | 0.00      |
| tblVehicleTrips                 | SU_TR                    | 5.00          | 0.00      |
| tblVehicleTrips                 | SU_TR                    | 1.74          | 0.00      |
| tblVehicleTrips                 | WD_TR                    | 4.96          | 4.00      |
| tblVehicleTrips                 | WD_TR                    | 1.74          | 0.00      |
| tblWater                        | IndoorWaterUseRate       | 2,414,250.00  | 219.00    |
| tblWater                        | IndoorWaterUseRate       | 74,000.00     | 0.00      |

**2.0 Emissions Summary**



Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

| Quarter | Start Date | End Date  | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---------|------------|-----------|--|--|
| 1       | 1-3-2022   | 4-2-2022  | 0.5254                                       | 0.5254                                     |
| 2       | 4-3-2022   | 7-2-2022  | 0.4780                                       | 0.4780                                     |
| 3       | 7-3-2022   | 9-30-2022 | 0.4728                                       | 0.4728                                     |
|         |            | Highest   | 0.5254                                       | 0.5254                                     |

**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         | 0.1219        | 1.3100e-003   | 0.0853        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4461         | 1.4791         | 9.7000e-004   | 8.0000e-005        | 1.5275         |
| Energy       | 2.2000e-004   | 1.9700e-003   | 1.5800e-003   | 1.0000e-005        |               | 1.5000e-004   | 1.5000e-004   |                | 1.5000e-004   | 1.5000e-004   | 0.0000        | 10.8882        | 10.8882        | 7.8000e-004   | 1.3000e-004        | 10.9461        |
| Mobile       | 0.0273        | 0.0395        | 0.2690        | 5.1000e-004        | 1.5355        | 4.7000e-004   | 1.5360        | 0.1610         | 4.4000e-004   | 0.1615        | 0.0000        | 47.2850        | 47.2850        | 3.0900e-003   | 2.2900e-003        | 48.0433        |
| Stationary   | 0.0444        | 4.2800e-003   | 0.1157        | 2.0000e-005        |               | 2.5000e-004   | 2.5000e-004   |                | 2.5000e-004   | 2.5000e-004   | 0.0000        | 2.5752         | 2.5752         | 5.3800e-003   | 0.0000             | 2.7098         |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 2.7221        | 0.0000         | 2.7221         | 0.1609        | 0.0000             | 6.7439         |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0207        | 0.0882         | 0.1090         | 2.1400e-003   | 5.0000e-005        | 0.1777         |
| <b>Total</b> | <b>0.1938</b> | <b>0.0470</b> | <b>0.4716</b> | <b>6.8000e-004</b> | <b>1.5355</b> | <b>0.0118</b> | <b>1.5473</b> | <b>0.1610</b>  | <b>0.0117</b> | <b>0.1728</b> | <b>3.7758</b> | <b>61.2828</b> | <b>65.0586</b> | <b>0.1732</b> | <b>2.5500e-003</b> | <b>70.1483</b> |

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2      | Total CO2      | CH4           | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|----------------|----------------|---------------|--------------------|----------------|
| Category     | tons/yr       |               |               |                    |               |               |               |                |               |               | MT/yr         |                |                |               |                    |                |
| Area         | 0.1219        | 1.3100e-003   | 0.0853        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4461         | 1.4791         | 9.7000e-004   | 8.0000e-005        | 1.5275         |
| Energy       | 2.2000e-004   | 1.9700e-003   | 1.5800e-003   | 1.0000e-005        |               | 1.5000e-004   | 1.5000e-004   |                | 1.5000e-004   | 1.5000e-004   | 0.0000        | 10.8882        | 10.8882        | 7.8000e-004   | 1.3000e-004        | 10.9461        |
| Mobile       | 0.0273        | 0.0395        | 0.2690        | 5.1000e-004        | 1.5355        | 4.7000e-004   | 1.5360        | 0.1610         | 4.4000e-004   | 0.1615        | 0.0000        | 47.2850        | 47.2850        | 3.0900e-003   | 2.2900e-003        | 48.0433        |
| Stationary   | 0.0444        | 4.2800e-003   | 0.1157        | 2.0000e-005        |               | 2.5000e-004   | 2.5000e-004   |                | 2.5000e-004   | 2.5000e-004   | 0.0000        | 2.5752         | 2.5752         | 5.3800e-003   | 0.0000             | 2.7098         |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 2.7221        | 0.0000         | 2.7221         | 0.1609        | 0.0000             | 6.7439         |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0207        | 0.0882         | 0.1090         | 2.1400e-003   | 5.0000e-005        | 0.1777         |
| <b>Total</b> | <b>0.1938</b> | <b>0.0470</b> | <b>0.4716</b> | <b>6.8000e-004</b> | <b>1.5355</b> | <b>0.0118</b> | <b>1.5473</b> | <b>0.1610</b>  | <b>0.0117</b> | <b>0.1728</b> | <b>3.7758</b> | <b>61.2828</b> | <b>65.0586</b> | <b>0.1732</b> | <b>2.5500e-003</b> | <b>70.1483</b> |

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

**3.0 Construction Detail**

**Construction Phase**

| Phase Number | Phase Name       | Phase Type       | Start Date | End Date  | Num Days Week | Num Days | Phase Description |
|--------------|------------------|------------------|------------|-----------|---------------|----------|-------------------|
| 1            | Demolition       | Demolition       | 1/3/2022   | 1/28/2022 | 5             | 20       |                   |
| 2            | Site Preparation | Site Preparation | 1/29/2022  | 2/1/2022  | 5             | 2        |                   |



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

|   |                       |                       |            |            |   |     |
|---|-----------------------|-----------------------|------------|------------|---|-----|
| 3 | Grading               | Grading               | 2/2/2022   | 2/7/2022   | 5 | 4   |
| 4 | Building Construction | Building Construction | 2/8/2022   | 11/14/2022 | 5 | 200 |
| 5 | Paving                | Paving                | 11/15/2022 | 11/28/2022 | 5 | 10  |
| 6 | Architectural Coating | Architectural Coating | 11/29/2022 | 12/12/2022 | 5 | 10  |

**Acres of Grading (Site Preparation Phase): 1.88**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0.79**

**Residential Indoor: 356; Residential Outdoor: 119; Non-Residential Indoor: 16,140; Non-Residential Outdoor: 5,380; Striped Parking Area: 2,058 (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        |
| Paving                | Cement and Mortar Mixers  | 1      | 6.00        | 9           | 0.56        |
| Demolition            | Concrete/Industrial Saws  | 1      | 8.00        | 81          | 0.73        |
| Building Construction | Cranes                    | 1      | 6.00        | 231         | 0.29        |
| Building Construction | Forklifts                 | 1      | 6.00        | 89          | 0.20        |
| Building Construction | Generator Sets            | 1      | 8.00        | 84          | 0.74        |
| Grading               | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Site Preparation      | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Paving                | Pavers                    | 1      | 6.00        | 130         | 0.42        |
| Paving                | Paving Equipment          | 1      | 8.00        | 132         | 0.36        |
| Paving                | Rollers                   | 1      | 7.00        | 80          | 0.38        |
| Demolition            | Rubber Tired Dozers       | 1      | 8.00        | 247         | 0.40        |
| Grading               | Rubber Tired Dozers       | 1      | 8.00        | 247         | 0.40        |
| Site Preparation      | Rubber Tired Dozers       | 1      | 7.00        | 247         | 0.40        |
| Building Construction | Tractors/Loaders/Backhoes | 1      | 6.00        | 97          | 0.37        |
| Demolition            | Tractors/Loaders/Backhoes | 3      | 8.00        | 97          | 0.37        |

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

|                       |                           |   |      |    |      |
|-----------------------|---------------------------|---|------|----|------|
| Grading               | Tractors/Loaders/Backhoes | 2 | 7.00 | 97 | 0.37 |
| Paving                | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |
| Site Preparation      | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |
| Building Construction | Welders                   | 3 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            | 5                       | 13.00              | 0.00               | 2.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Site Preparation      | 3                       | 8.00               | 0.00               | 59.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Grading               | 4                       | 10.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Building Construction | 7                       | 19.00              | 7.00               | 19.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Paving                | 5                       | 13.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Architectural Coating | 1                       | 4.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |

**3.1 Mitigation Measures Construction**

Water Exposed Area

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

**3.2 Demolition - 2022**

**Unmitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2                | Fugitive PM10      | Exhaust PM10       | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2      | Total CO2      | CH4                | N2O           | CO2e           |
|---------------|---------------|---------------|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|----------------|----------------|--------------------|---------------|----------------|
| Category      | tons/yr       |               |               |                    |                    |                    |                    |                    |                    |                    | MT/yr         |                |                |                    |               |                |
| Fugitive Dust |               |               |               |                    | 2.5000e-004        | 0.0000             | 2.5000e-004        | 4.0000e-005        | 0.0000             | 4.0000e-005        | 0.0000        | 0.0000         | 0.0000         | 0.0000             | 0.0000        | 0.0000         |
| Off-Road      | 0.0169        | 0.1662        | 0.1396        | 2.4000e-004        |                    | 8.3800e-003        | 8.3800e-003        |                    | 7.8300e-003        | 7.8300e-003        | 0.0000        | 21.0777        | 21.0777        | 5.3700e-003        | 0.0000        | 21.2120        |
| <b>Total</b>  | <b>0.0169</b> | <b>0.1662</b> | <b>0.1396</b> | <b>2.4000e-004</b> | <b>2.5000e-004</b> | <b>8.3800e-003</b> | <b>8.6300e-003</b> | <b>4.0000e-005</b> | <b>7.8300e-003</b> | <b>7.8700e-003</b> | <b>0.0000</b> | <b>21.0777</b> | <b>21.0777</b> | <b>5.3700e-003</b> | <b>0.0000</b> | <b>21.2120</b> |

**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             | 1.5000e-004        | 3.0000e-005        | 0.0000             | 2.0000e-005        | 0.0000             | 2.0000e-005        | 0.0000             | 0.0000             | 1.0000e-005        | 0.0000        | 0.0580        | 0.0580        | 0.0000             | 1.0000e-005        | 0.0607        |
| 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       | 7.5000e-004        | 5.3000e-004        | 5.6200e-003        | 1.0000e-005        | 1.6100e-003        | 1.0000e-005        | 1.6200e-003        | 4.3000e-004        | 1.0000e-005        | 4.4000e-004        | 0.0000        | 1.3437        | 1.3437        | 4.0000e-005        | 4.0000e-005        | 1.3570        |
| <b>Total</b> | <b>7.5000e-004</b> | <b>6.8000e-004</b> | <b>5.6500e-003</b> | <b>1.0000e-005</b> | <b>1.6300e-003</b> | <b>1.0000e-005</b> | <b>1.6400e-003</b> | <b>4.3000e-004</b> | <b>1.0000e-005</b> | <b>4.5000e-004</b> | <b>0.0000</b> | <b>1.4017</b> | <b>1.4017</b> | <b>4.0000e-005</b> | <b>5.0000e-005</b> | <b>1.4178</b> |

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

**3.2 Demolition - 2022**

**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 |               |               |               |                    | 1.1000e-004        | 0.0000             | 1.1000e-004        | 2.0000e-005        | 0.0000             | 2.0000e-005        | 0.0000        | 0.0000         | 0.0000         | 0.0000             | 0.0000        | 0.0000         |
| Off-Road      | 0.0169        | 0.1662        | 0.1396        | 2.4000e-004        |                    | 8.3800e-003        | 8.3800e-003        |                    | 7.8300e-003        | 7.8300e-003        | 0.0000        | 21.0777        | 21.0777        | 5.3700e-003        | 0.0000        | 21.2119        |
| <b>Total</b>  | <b>0.0169</b> | <b>0.1662</b> | <b>0.1396</b> | <b>2.4000e-004</b> | <b>1.1000e-004</b> | <b>8.3800e-003</b> | <b>8.4900e-003</b> | <b>2.0000e-005</b> | <b>7.8300e-003</b> | <b>7.8500e-003</b> | <b>0.0000</b> | <b>21.0777</b> | <b>21.0777</b> | <b>5.3700e-003</b> | <b>0.0000</b> | <b>21.2119</b> |

**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             | 1.5000e-004        | 3.0000e-005        | 0.0000             | 2.0000e-005        | 0.0000             | 2.0000e-005        | 0.0000             | 0.0000             | 1.0000e-005        | 0.0000        | 0.0580        | 0.0580        | 0.0000             | 1.0000e-005        | 0.0607        |
| 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       | 7.5000e-004        | 5.3000e-004        | 5.6200e-003        | 1.0000e-005        | 1.6100e-003        | 1.0000e-005        | 1.6200e-003        | 4.3000e-004        | 1.0000e-005        | 4.4000e-004        | 0.0000        | 1.3437        | 1.3437        | 4.0000e-005        | 4.0000e-005        | 1.3570        |
| <b>Total</b> | <b>7.5000e-004</b> | <b>6.8000e-004</b> | <b>5.6500e-003</b> | <b>1.0000e-005</b> | <b>1.6300e-003</b> | <b>1.0000e-005</b> | <b>1.6400e-003</b> | <b>4.3000e-004</b> | <b>1.0000e-005</b> | <b>4.5000e-004</b> | <b>0.0000</b> | <b>1.4017</b> | <b>1.4017</b> | <b>4.0000e-005</b> | <b>5.0000e-005</b> | <b>1.4178</b> |

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

**3.3 Site Preparation - 2022**

**Unmitigated Construction On-Site**

|               | ROG                | NOx           | CO                 | SO2                | Fugitive PM10      | Exhaust PM10       | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|---------------|--------------------|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category      | tons/yr            |               |                    |                    |                    |                    |                    |                    |                    |                    | MT/yr         |               |               |                    |               |               |
| Fugitive Dust |                    |               |                    |                    | 6.2700e-003        | 0.0000             | 6.2700e-003        | 3.0000e-003        | 0.0000             | 3.0000e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 1.3100e-003        | 0.0146        | 7.0900e-003        | 2.0000e-005        |                    | 6.2000e-004        | 6.2000e-004        |                    | 5.7000e-004        | 5.7000e-004        | 0.0000        | 1.5115        | 1.5115        | 4.9000e-004        | 0.0000        | 1.5238        |
| <b>Total</b>  | <b>1.3100e-003</b> | <b>0.0146</b> | <b>7.0900e-003</b> | <b>2.0000e-005</b> | <b>6.2700e-003</b> | <b>6.2000e-004</b> | <b>6.8900e-003</b> | <b>3.0000e-003</b> | <b>5.7000e-004</b> | <b>3.5700e-003</b> | <b>0.0000</b> | <b>1.5115</b> | <b>1.5115</b> | <b>4.9000e-004</b> | <b>0.0000</b> | <b>1.5238</b> |

**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      | 1.0000e-004        | 4.5300e-003        | 9.8000e-004        | 2.0000e-005        | 5.0000e-004        | 4.0000e-005        | 5.5000e-004        | 1.4000e-004        | 4.0000e-005        | 1.8000e-004        | 0.0000        | 1.7112        | 1.7112        | 0.0000        | 2.7000e-004        | 1.7915        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        |
| Worker       | 5.0000e-005        | 3.0000e-005        | 3.5000e-004        | 0.0000             | 1.0000e-004        | 0.0000             | 1.0000e-004        | 3.0000e-005        | 0.0000             | 3.0000e-005        | 0.0000        | 0.0827        | 0.0827        | 0.0000        | 0.0000             | 0.0835        |
| <b>Total</b> | <b>1.5000e-004</b> | <b>4.5600e-003</b> | <b>1.3300e-003</b> | <b>2.0000e-005</b> | <b>6.0000e-004</b> | <b>4.0000e-005</b> | <b>6.5000e-004</b> | <b>1.7000e-004</b> | <b>4.0000e-005</b> | <b>2.1000e-004</b> | <b>0.0000</b> | <b>1.7939</b> | <b>1.7939</b> | <b>0.0000</b> | <b>2.7000e-004</b> | <b>1.8750</b> |

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

**3.3 Site Preparation - 2022**

**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 |                    |               |                    |                    | 2.8200e-003        | 0.0000             | 2.8200e-003        | 1.3500e-003        | 0.0000             | 1.3500e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 1.3100e-003        | 0.0146        | 7.0900e-003        | 2.0000e-005        |                    | 6.2000e-004        | 6.2000e-004        |                    | 5.7000e-004        | 5.7000e-004        | 0.0000        | 1.5115        | 1.5115        | 4.9000e-004        | 0.0000        | 1.5238        |
| <b>Total</b>  | <b>1.3100e-003</b> | <b>0.0146</b> | <b>7.0900e-003</b> | <b>2.0000e-005</b> | <b>2.8200e-003</b> | <b>6.2000e-004</b> | <b>3.4400e-003</b> | <b>1.3500e-003</b> | <b>5.7000e-004</b> | <b>1.9200e-003</b> | <b>0.0000</b> | <b>1.5115</b> | <b>1.5115</b> | <b>4.9000e-004</b> | <b>0.0000</b> | <b>1.5238</b> |

**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      | 1.0000e-004        | 4.5300e-003        | 9.8000e-004        | 2.0000e-005        | 5.0000e-004        | 4.0000e-005        | 5.5000e-004        | 1.4000e-004        | 4.0000e-005        | 1.8000e-004        | 0.0000        | 1.7112        | 1.7112        | 0.0000        | 2.7000e-004        | 1.7915        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        |
| Worker       | 5.0000e-005        | 3.0000e-005        | 3.5000e-004        | 0.0000             | 1.0000e-004        | 0.0000             | 1.0000e-004        | 3.0000e-005        | 0.0000             | 3.0000e-005        | 0.0000        | 0.0827        | 0.0827        | 0.0000        | 0.0000             | 0.0835        |
| <b>Total</b> | <b>1.5000e-004</b> | <b>4.5600e-003</b> | <b>1.3300e-003</b> | <b>2.0000e-005</b> | <b>6.0000e-004</b> | <b>4.0000e-005</b> | <b>6.5000e-004</b> | <b>1.7000e-004</b> | <b>4.0000e-005</b> | <b>2.1000e-004</b> | <b>0.0000</b> | <b>1.7939</b> | <b>1.7939</b> | <b>0.0000</b> | <b>2.7000e-004</b> | <b>1.8750</b> |

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

**3.4 Grading - 2022**

**Unmitigated Construction On-Site**

|               | ROG                | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|---------------|--------------------|---------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category      | tons/yr            |               |               |                    |               |                    |               |                    |                    |                    | MT/yr         |               |               |                    |               |               |
| Fugitive Dust |                    |               |               |                    | 0.0142        | 0.0000             | 0.0142        | 6.8500e-003        | 0.0000             | 6.8500e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 3.0800e-003        | 0.0340        | 0.0184        | 4.0000e-005        |               | 1.4800e-003        | 1.4800e-003   |                    | 1.3700e-003        | 1.3700e-003        | 0.0000        | 3.6205        | 3.6205        | 1.1700e-003        | 0.0000        | 3.6498        |
| <b>Total</b>  | <b>3.0800e-003</b> | <b>0.0340</b> | <b>0.0184</b> | <b>4.0000e-005</b> | <b>0.0142</b> | <b>1.4800e-003</b> | <b>0.0157</b> | <b>6.8500e-003</b> | <b>1.3700e-003</b> | <b>8.2200e-003</b> | <b>0.0000</b> | <b>3.6205</b> | <b>3.6205</b> | <b>1.1700e-003</b> | <b>0.0000</b> | <b>3.6498</b> |

**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       | 1.2000e-004        | 8.0000e-005        | 8.7000e-004        | 0.0000        | 2.5000e-004        | 0.0000        | 2.5000e-004        | 7.0000e-005        | 0.0000        | 7.0000e-005        | 0.0000        | 0.2067        | 0.2067        | 1.0000e-005        | 1.0000e-005        | 0.2088        |
| <b>Total</b> | <b>1.2000e-004</b> | <b>8.0000e-005</b> | <b>8.7000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>0.2067</b> | <b>0.2067</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>0.2088</b> |

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

**3.4 Grading - 2022**

**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 |                    |               |               |                    | 6.3700e-003        | 0.0000             | 6.3700e-003        | 3.0800e-003        | 0.0000             | 3.0800e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 3.0800e-003        | 0.0340        | 0.0184        | 4.0000e-005        |                    | 1.4800e-003        | 1.4800e-003        |                    | 1.3700e-003        | 1.3700e-003        | 0.0000        | 3.6205        | 3.6205        | 1.1700e-003        | 0.0000        | 3.6498        |
| <b>Total</b>  | <b>3.0800e-003</b> | <b>0.0340</b> | <b>0.0184</b> | <b>4.0000e-005</b> | <b>6.3700e-003</b> | <b>1.4800e-003</b> | <b>7.8500e-003</b> | <b>3.0800e-003</b> | <b>1.3700e-003</b> | <b>4.4500e-003</b> | <b>0.0000</b> | <b>3.6205</b> | <b>3.6205</b> | <b>1.1700e-003</b> | <b>0.0000</b> | <b>3.6498</b> |

**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       | 1.2000e-004        | 8.0000e-005        | 8.7000e-004        | 0.0000        | 2.5000e-004        | 0.0000        | 2.5000e-004        | 7.0000e-005        | 0.0000        | 7.0000e-005        | 0.0000        | 0.2067        | 0.2067        | 1.0000e-005        | 1.0000e-005        | 0.2088        |
| <b>Total</b> | <b>1.2000e-004</b> | <b>8.0000e-005</b> | <b>8.7000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>0.2067</b> | <b>0.2067</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>0.2088</b> |



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

**3.5 Building Construction - 2022**

**Unmitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|---------------|-----------------|
| Category     | tons/yr       |               |               |                    |               |               |               |                |               |               | MT/yr         |                 |                 |               |               |                 |
| Off-Road     | 0.1649        | 1.2503        | 1.2726        | 2.2100e-003        |               | 0.0589        | 0.0589        |                | 0.0569        | 0.0569        | 0.0000        | 181.5769        | 181.5769        | 0.0316        | 0.0000        | 182.3675        |
| <b>Total</b> | <b>0.1649</b> | <b>1.2503</b> | <b>1.2726</b> | <b>2.2100e-003</b> |               | <b>0.0589</b> | <b>0.0589</b> |                | <b>0.0569</b> | <b>0.0569</b> | <b>0.0000</b> | <b>181.5769</b> | <b>181.5769</b> | <b>0.0316</b> | <b>0.0000</b> | <b>182.3675</b> |

**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      | 3.0000e-005   | 1.4600e-003   | 3.2000e-004   | 1.0000e-005        | 1.6000e-004   | 1.0000e-005        | 1.8000e-004   | 4.0000e-005        | 1.0000e-005        | 6.0000e-005        | 0.0000        | 0.5511         | 0.5511         | 0.0000             | 9.0000e-005        | 0.5769         |
| Vendor       | 2.1300e-003   | 0.0357        | 0.0167        | 1.4000e-004        | 4.1800e-003   | 3.1000e-004        | 4.4900e-003   | 1.2100e-003        | 2.9000e-004        | 1.5000e-003        | 0.0000        | 13.6253        | 13.6253        | 1.0000e-004        | 1.7900e-003        | 14.1598        |
| Worker       | 0.0110        | 7.7500e-003   | 0.0822        | 2.1000e-004        | 0.0235        | 1.4000e-004        | 0.0236        | 6.2400e-003        | 1.3000e-004        | 6.3700e-003        | 0.0000        | 19.6382        | 19.6382        | 6.1000e-004        | 6.0000e-004        | 19.8334        |
| <b>Total</b> | <b>0.0132</b> | <b>0.0449</b> | <b>0.0992</b> | <b>3.6000e-004</b> | <b>0.0278</b> | <b>4.6000e-004</b> | <b>0.0283</b> | <b>7.4900e-003</b> | <b>4.3000e-004</b> | <b>7.9300e-003</b> | <b>0.0000</b> | <b>33.8146</b> | <b>33.8146</b> | <b>7.1000e-004</b> | <b>2.4800e-003</b> | <b>34.5701</b> |

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

**3.5 Building Construction - 2022**

**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     | 0.1649        | 1.2503        | 1.2726        | 2.2100e-003        |               | 0.0589        | 0.0589        |                | 0.0569        | 0.0569        | 0.0000        | 181.5767        | 181.5767        | 0.0316        | 0.0000        | 182.3673        |
| <b>Total</b> | <b>0.1649</b> | <b>1.2503</b> | <b>1.2726</b> | <b>2.2100e-003</b> |               | <b>0.0589</b> | <b>0.0589</b> |                | <b>0.0569</b> | <b>0.0569</b> | <b>0.0000</b> | <b>181.5767</b> | <b>181.5767</b> | <b>0.0316</b> | <b>0.0000</b> | <b>182.3673</b> |

**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      | 3.0000e-005   | 1.4600e-003   | 3.2000e-004   | 1.0000e-005        | 1.6000e-004   | 1.0000e-005        | 1.8000e-004   | 4.0000e-005        | 1.0000e-005        | 6.0000e-005        | 0.0000        | 0.5511         | 0.5511         | 0.0000             | 9.0000e-005        | 0.5769         |
| Vendor       | 2.1300e-003   | 0.0357        | 0.0167        | 1.4000e-004        | 4.1800e-003   | 3.1000e-004        | 4.4900e-003   | 1.2100e-003        | 2.9000e-004        | 1.5000e-003        | 0.0000        | 13.6253        | 13.6253        | 1.0000e-004        | 1.7900e-003        | 14.1598        |
| Worker       | 0.0110        | 7.7500e-003   | 0.0822        | 2.1000e-004        | 0.0235        | 1.4000e-004        | 0.0236        | 6.2400e-003        | 1.3000e-004        | 6.3700e-003        | 0.0000        | 19.6382        | 19.6382        | 6.1000e-004        | 6.0000e-004        | 19.8334        |
| <b>Total</b> | <b>0.0132</b> | <b>0.0449</b> | <b>0.0992</b> | <b>3.6000e-004</b> | <b>0.0278</b> | <b>4.6000e-004</b> | <b>0.0283</b> | <b>7.4900e-003</b> | <b>4.3000e-004</b> | <b>7.9300e-003</b> | <b>0.0000</b> | <b>33.8146</b> | <b>33.8146</b> | <b>7.1000e-004</b> | <b>2.4800e-003</b> | <b>34.5701</b> |

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

**3.6 Paving - 2022**

**Unmitigated Construction On-Site**

|              | ROG                | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total         | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|--------------|--------------------|---------------|---------------|--------------------|---------------|--------------------|--------------------|----------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category     | tons/yr            |               |               |                    |               |                    |                    |                |                    |                    | MT/yr         |               |               |                    |               |               |
| Off-Road     | 3.4400e-003        | 0.0339        | 0.0440        | 7.0000e-005        |               | 1.7400e-003        | 1.7400e-003        |                | 1.6000e-003        | 1.6000e-003        | 0.0000        | 5.8848        | 5.8848        | 1.8700e-003        | 0.0000        | 5.9315        |
| Paving       | 0.0000             |               |               |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| <b>Total</b> | <b>3.4400e-003</b> | <b>0.0339</b> | <b>0.0440</b> | <b>7.0000e-005</b> |               | <b>1.7400e-003</b> | <b>1.7400e-003</b> |                | <b>1.6000e-003</b> | <b>1.6000e-003</b> | <b>0.0000</b> | <b>5.8848</b> | <b>5.8848</b> | <b>1.8700e-003</b> | <b>0.0000</b> | <b>5.9315</b> |

**Unmitigated Construction Off-Site**

|              | ROG                | NOx                | CO                 | SO2                | Fugitive PM10      | Exhaust PM10  | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O                | CO2e          |
|--------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|---------------|---------------|---------------|--------------------|--------------------|---------------|
| Category     | tons/yr            |                    |                    |                    |                    |               |                    |                    |               |                    | MT/yr         |               |               |                    |                    |               |
| Hauling      | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Worker       | 3.8000e-004        | 2.7000e-004        | 2.8100e-003        | 1.0000e-005        | 8.0000e-004        | 0.0000        | 8.1000e-004        | 2.1000e-004        | 0.0000        | 2.2000e-004        | 0.0000        | 0.6718        | 0.6718        | 2.0000e-005        | 2.0000e-005        | 0.6785        |
| <b>Total</b> | <b>3.8000e-004</b> | <b>2.7000e-004</b> | <b>2.8100e-003</b> | <b>1.0000e-005</b> | <b>8.0000e-004</b> | <b>0.0000</b> | <b>8.1000e-004</b> | <b>2.1000e-004</b> | <b>0.0000</b> | <b>2.2000e-004</b> | <b>0.0000</b> | <b>0.6718</b> | <b>0.6718</b> | <b>2.0000e-005</b> | <b>2.0000e-005</b> | <b>0.6785</b> |

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

**3.6 Paving - 2022**

**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     | 3.4400e-003        | 0.0339        | 0.0440        | 7.0000e-005        |               | 1.7400e-003        | 1.7400e-003        |                | 1.6000e-003        | 1.6000e-003        | 0.0000        | 5.8848        | 5.8848        | 1.8700e-003        | 0.0000        | 5.9314        |
| Paving       | 0.0000             |               |               |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| <b>Total</b> | <b>3.4400e-003</b> | <b>0.0339</b> | <b>0.0440</b> | <b>7.0000e-005</b> |               | <b>1.7400e-003</b> | <b>1.7400e-003</b> |                | <b>1.6000e-003</b> | <b>1.6000e-003</b> | <b>0.0000</b> | <b>5.8848</b> | <b>5.8848</b> | <b>1.8700e-003</b> | <b>0.0000</b> | <b>5.9314</b> |

**Mitigated Construction Off-Site**

|              | ROG                | NOx                | CO                 | SO2                | Fugitive PM10      | Exhaust PM10  | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O                | CO2e          |
|--------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|---------------|---------------|---------------|--------------------|--------------------|---------------|
| Category     | tons/yr            |                    |                    |                    |                    |               |                    |                    |               |                    | MT/yr         |               |               |                    |                    |               |
| Hauling      | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Worker       | 3.8000e-004        | 2.7000e-004        | 2.8100e-003        | 1.0000e-005        | 8.0000e-004        | 0.0000        | 8.1000e-004        | 2.1000e-004        | 0.0000        | 2.2000e-004        | 0.0000        | 0.6718        | 0.6718        | 2.0000e-005        | 2.0000e-005        | 0.6785        |
| <b>Total</b> | <b>3.8000e-004</b> | <b>2.7000e-004</b> | <b>2.8100e-003</b> | <b>1.0000e-005</b> | <b>8.0000e-004</b> | <b>0.0000</b> | <b>8.1000e-004</b> | <b>2.1000e-004</b> | <b>0.0000</b> | <b>2.2000e-004</b> | <b>0.0000</b> | <b>0.6718</b> | <b>0.6718</b> | <b>2.0000e-005</b> | <b>2.0000e-005</b> | <b>0.6785</b> |

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

**3.7 Architectural Coating - 2022**

**Unmitigated Construction On-Site**

|                 | ROG           | NOx                | CO                 | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total         | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|-----------------|---------------|--------------------|--------------------|--------------------|---------------|--------------------|--------------------|----------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category        | tons/yr       |                    |                    |                    |               |                    |                    |                |                    |                    | MT/yr         |               |               |                    |               |               |
| Archit. Coating | 0.1394        |                    |                    |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road        | 1.0200e-003   | 7.0400e-003        | 9.0700e-003        | 1.0000e-005        |               | 4.1000e-004        | 4.1000e-004        |                | 4.1000e-004        | 4.1000e-004        | 0.0000        | 1.2766        | 1.2766        | 8.0000e-005        | 0.0000        | 1.2787        |
| <b>Total</b>    | <b>0.1404</b> | <b>7.0400e-003</b> | <b>9.0700e-003</b> | <b>1.0000e-005</b> |               | <b>4.1000e-004</b> | <b>4.1000e-004</b> |                | <b>4.1000e-004</b> | <b>4.1000e-004</b> | <b>0.0000</b> | <b>1.2766</b> | <b>1.2766</b> | <b>8.0000e-005</b> | <b>0.0000</b> | <b>1.2787</b> |

**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       | 1.2000e-004        | 8.0000e-005        | 8.7000e-004        | 0.0000        | 2.5000e-004        | 0.0000        | 2.5000e-004        | 7.0000e-005        | 0.0000        | 7.0000e-005        | 0.0000        | 0.2067        | 0.2067        | 1.0000e-005        | 1.0000e-005        | 0.2088        |
| <b>Total</b> | <b>1.2000e-004</b> | <b>8.0000e-005</b> | <b>8.7000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>0.2067</b> | <b>0.2067</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>0.2088</b> |

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

**3.7 Architectural Coating - 2022**

**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 | 0.1394        |                    |                    |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road        | 1.0200e-003   | 7.0400e-003        | 9.0700e-003        | 1.0000e-005        |               | 4.1000e-004        | 4.1000e-004        |                | 4.1000e-004        | 4.1000e-004        | 0.0000        | 1.2766        | 1.2766        | 8.0000e-005        | 0.0000        | 1.2787        |
| <b>Total</b>    | <b>0.1404</b> | <b>7.0400e-003</b> | <b>9.0700e-003</b> | <b>1.0000e-005</b> |               | <b>4.1000e-004</b> | <b>4.1000e-004</b> |                | <b>4.1000e-004</b> | <b>4.1000e-004</b> | <b>0.0000</b> | <b>1.2766</b> | <b>1.2766</b> | <b>8.0000e-005</b> | <b>0.0000</b> | <b>1.2787</b> |

**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       | 1.2000e-004        | 8.0000e-005        | 8.7000e-004        | 0.0000        | 2.5000e-004        | 0.0000        | 2.5000e-004        | 7.0000e-005        | 0.0000        | 7.0000e-005        | 0.0000        | 0.2067        | 0.2067        | 1.0000e-005        | 1.0000e-005        | 0.2088        |
| <b>Total</b> | <b>1.2000e-004</b> | <b>8.0000e-005</b> | <b>8.7000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>0.0000</b> | <b>2.5000e-004</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>0.2067</b> | <b>0.2067</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>0.2088</b> |

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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   | 0.0273  | 0.0395 | 0.2690 | 5.1000e-004 | 1.5355        | 4.7000e-004  | 1.5360     | 0.1610         | 4.4000e-004   | 0.1615      | 0.0000   | 47.2850   | 47.2850   | 3.0900e-003 | 2.2900e-003 | 48.0433 |
| Unmitigated | 0.0273  | 0.0395 | 0.2690 | 5.1000e-004 | 1.5355        | 4.7000e-004  | 1.5360     | 0.1610         | 4.4000e-004   | 0.1615      | 0.0000   | 47.2850   | 47.2850   | 3.0900e-003 | 2.2900e-003 | 48.0433 |

4.2 Trip Summary Information

| Land Use                         | Average Daily Trip Rate |          |        | Unmitigated | Mitigated  |
|----------------------------------|-------------------------|----------|--------|-------------|------------|
|                                  | Weekday                 | Saturday | Sunday | Annual VMT  | Annual VMT |
| General Light Industry           | 41.76                   | 0.00     | 0.00   | 115,242     | 115,242    |
| Other Non-Asphalt Surfaces       | 0.00                    | 0.00     | 0.00   |             |            |
| Unrefrigerated Warehouse-No Rail | 0.00                    | 0.00     | 0.00   |             |            |
| Mobile Home Park                 | 5.00                    | 4.61     | 4.24   | 17,983      | 17,983     |
| Total                            | 46.76                   | 4.61     | 4.24   | 133,224     | 133,224    |

4.3 Trip Type Information

| Land Use                    | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|-----------------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                             | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| General Light Industry      | 14.70      | 6.60       | 6.60        | 59.00      | 28.00      | 13.00       | 92             | 5        | 3       |
| Other Non-Asphalt Surfaces  | 14.70      | 6.60       | 6.60        | 0.00       | 0.00       | 0.00        | 0              | 0        | 0       |
| Unrefrigerated Warehouse-No | 14.70      | 6.60       | 6.60        | 59.00      | 0.00       | 41.00       | 92             | 5        | 3       |

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| Land Use         | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                  | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| Mobile Home Park | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |

**4.4 Fleet Mix**

| Land Use                         | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|----------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| General Light Industry           | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |
| Other Non-Asphalt Surfaces       | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |
| Unrefrigerated Warehouse-No Rail | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |
| Mobile Home Park                 | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |

**5.0 Energy Detail**

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Historical Energy Use: N

**5.1 Mitigation Measures Energy**

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Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

|                         | ROG         | NOx         | CO          | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total  | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------------------|-------------|-------------|-------------|-------------|---------------|--------------|-------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category                | tons/yr     |             |             |             |               |              |             |                |               |             | MT/yr    |           |           |             |             |        |
| Electricity Mitigated   |             |             |             |             |               | 0.0000       | 0.0000      |                | 0.0000        | 0.0000      | 0.0000   | 8.7337    | 8.7337    | 7.4000e-004 | 9.0000e-005 | 8.7787 |
| Electricity Unmitigated |             |             |             |             |               | 0.0000       | 0.0000      |                | 0.0000        | 0.0000      | 0.0000   | 8.7337    | 8.7337    | 7.4000e-004 | 9.0000e-005 | 8.7787 |
| NaturalGas Mitigated    | 2.2000e-004 | 1.9700e-003 | 1.5800e-003 | 1.0000e-005 |               | 1.5000e-004  | 1.5000e-004 |                | 1.5000e-004   | 1.5000e-004 | 0.0000   | 2.1545    | 2.1545    | 4.0000e-005 | 4.0000e-005 | 2.1673 |
| NaturalGas Unmitigated  | 2.2000e-004 | 1.9700e-003 | 1.5800e-003 | 1.0000e-005 |               | 1.5000e-004  | 1.5000e-004 |                | 1.5000e-004   | 1.5000e-004 | 0.0000   | 2.1545    | 2.1545    | 4.0000e-005 | 4.0000e-005 | 2.1673 |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**5.2 Energy by Land Use - NaturalGas**

**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 Light Industry           | 36331.2        | 2.0000e-004        | 1.7800e-003        | 1.5000e-003        | 1.0000e-005        |               | 1.4000e-004        | 1.4000e-004        |                | 1.4000e-004        | 1.4000e-004        | 0.0000        | 1.9388        | 1.9388        | 4.0000e-005        | 4.0000e-005        | 1.9503        |
| Mobile Home Park                 | 4043.32        | 2.0000e-005        | 1.9000e-004        | 8.0000e-005        | 0.0000             |               | 2.0000e-005        | 2.0000e-005        |                | 2.0000e-005        | 2.0000e-005        | 0.0000        | 0.2158        | 0.2158        | 0.0000             | 0.0000             | 0.2171        |
| Other Non-Asphalt Surfaces       | 0              | 0.0000             | 0.0000             | 0.0000             | 0.0000             |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 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        |
| <b>Total</b>                     |                | <b>2.2000e-004</b> | <b>1.9700e-003</b> | <b>1.5800e-003</b> | <b>1.0000e-005</b> |               | <b>1.6000e-004</b> | <b>1.6000e-004</b> |                | <b>1.6000e-004</b> | <b>1.6000e-004</b> | <b>0.0000</b> | <b>2.1545</b> | <b>2.1545</b> | <b>4.0000e-005</b> | <b>4.0000e-005</b> | <b>2.1673</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**5.2 Energy by Land Use - NaturalGas**

**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 Light Industry           | 36331.2        | 2.0000e-004        | 1.7800e-003        | 1.5000e-003        | 1.0000e-005        |               | 1.4000e-004        | 1.4000e-004        |                | 1.4000e-004        | 1.4000e-004        | 0.0000        | 1.9388        | 1.9388        | 4.0000e-005        | 4.0000e-005        | 1.9503        |
| Mobile Home Park                 | 4043.32        | 2.0000e-005        | 1.9000e-004        | 8.0000e-005        | 0.0000             |               | 2.0000e-005        | 2.0000e-005        |                | 2.0000e-005        | 2.0000e-005        | 0.0000        | 0.2158        | 0.2158        | 0.0000             | 0.0000             | 0.2171        |
| Other Non-Asphalt Surfaces       | 0              | 0.0000             | 0.0000             | 0.0000             | 0.0000             |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 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        |
| <b>Total</b>                     |                | <b>2.2000e-004</b> | <b>1.9700e-003</b> | <b>1.5800e-003</b> | <b>1.0000e-005</b> |               | <b>1.6000e-004</b> | <b>1.6000e-004</b> |                | <b>1.6000e-004</b> | <b>1.6000e-004</b> | <b>0.0000</b> | <b>2.1545</b> | <b>2.1545</b> | <b>4.0000e-005</b> | <b>4.0000e-005</b> | <b>2.1673</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

|                                  | Electricity Use | Total CO2     | CH4                | N2O                | CO2e          |
|----------------------------------|-----------------|---------------|--------------------|--------------------|---------------|
| Land Use                         | kWh/yr          | MT/yr         |                    |                    |               |
| General Light Industry           | 44056.8         | 7.8133        | 6.6000e-004        | 8.0000e-005        | 7.8536        |
| Mobile Home Park                 | 5189.93         | 0.9204        | 8.0000e-005        | 1.0000e-005        | 0.9252        |
| Other Non-Asphalt Surfaces       | 0               | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 0               | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| <b>Total</b>                     |                 | <b>8.7337</b> | <b>7.4000e-004</b> | <b>9.0000e-005</b> | <b>8.7787</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**5.3 Energy by Land Use - Electricity**

**Mitigated**

|                                  | Electricity Use | Total CO2     | CH4                | N2O                | CO2e          |
|----------------------------------|-----------------|---------------|--------------------|--------------------|---------------|
| Land Use                         | kWh/yr          | MT/yr         |                    |                    |               |
| General Light Industry           | 44056.8         | 7.8133        | 6.6000e-004        | 8.0000e-005        | 7.8536        |
| Mobile Home Park                 | 5189.93         | 0.9204        | 8.0000e-005        | 1.0000e-005        | 0.9252        |
| Other Non-Asphalt Surfaces       | 0               | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 0               | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| <b>Total</b>                     |                 | <b>8.7337</b> | <b>7.4000e-004</b> | <b>9.0000e-005</b> | <b>8.7787</b> |

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

|             | ROG     | NOx         | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------|---------|-------------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category    | tons/yr |             |        |             |               |              |            |                |               |             | MT/yr    |           |           |             |             |        |
| Mitigated   | 0.1219  | 1.3100e-003 | 0.0853 | 1.4000e-004 |               | 0.0109       | 0.0109     |                | 0.0109        | 0.0109      | 1.0330   | 0.4461    | 1.4791    | 9.7000e-004 | 8.0000e-005 | 1.5275 |
| Unmitigated | 0.1219  | 1.3100e-003 | 0.0853 | 1.4000e-004 |               | 0.0109       | 0.0109     |                | 0.0109        | 0.0109      | 1.0330   | 0.4461    | 1.4791    | 9.7000e-004 | 8.0000e-005 | 1.5275 |

**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 | 0.0139        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 0.0449        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.0628        | 1.2300e-003        | 0.0775        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4332        | 1.4662        | 9.5000e-004        | 8.0000e-005        | 1.5142        |
| Landscaping           | 2.6000e-004   | 9.0000e-005        | 7.8400e-003   | 0.0000             |               | 4.0000e-005   | 4.0000e-005   |                | 4.0000e-005   | 4.0000e-005   | 0.0000        | 0.0129        | 0.0129        | 1.0000e-005        | 0.0000             | 0.0133        |
| <b>Total</b>          | <b>0.1219</b> | <b>1.3200e-003</b> | <b>0.0853</b> | <b>1.4000e-004</b> |               | <b>0.0109</b> | <b>0.0109</b> |                | <b>0.0109</b> | <b>0.0109</b> | <b>1.0330</b> | <b>0.4461</b> | <b>1.4791</b> | <b>9.6000e-004</b> | <b>8.0000e-005</b> | <b>1.5275</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O                | CO2e          |
|-----------------------|---------------|--------------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|--------------------|--------------------|---------------|
| SubCategory           | tons/yr       |                    |               |                    |               |               |               |                |               |               | MT/yr         |               |               |                    |                    |               |
| Architectural Coating | 0.0139        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 0.0449        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.0628        | 1.2300e-003        | 0.0775        | 1.4000e-004        |               | 0.0109        | 0.0109        |                | 0.0109        | 0.0109        | 1.0330        | 0.4332        | 1.4662        | 9.5000e-004        | 8.0000e-005        | 1.5142        |
| Landscaping           | 2.6000e-004   | 9.0000e-005        | 7.8400e-003   | 0.0000             |               | 4.0000e-005   | 4.0000e-005   |                | 4.0000e-005   | 4.0000e-005   | 0.0000        | 0.0129        | 0.0129        | 1.0000e-005        | 0.0000             | 0.0133        |
| <b>Total</b>          | <b>0.1219</b> | <b>1.3200e-003</b> | <b>0.0853</b> | <b>1.4000e-004</b> |               | <b>0.0109</b> | <b>0.0109</b> |                | <b>0.0109</b> | <b>0.0109</b> | <b>1.0330</b> | <b>0.4461</b> | <b>1.4791</b> | <b>9.6000e-004</b> | <b>8.0000e-005</b> | <b>1.5275</b> |

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

|             | Total CO2 | CH4         | N2O         | CO2e   |
|-------------|-----------|-------------|-------------|--------|
| Category    | MT/yr     |             |             |        |
| Mitigated   | 0.1090    | 2.1400e-003 | 5.0000e-005 | 0.1777 |
| Unmitigated | 0.1090    | 2.1400e-003 | 5.0000e-005 | 0.1777 |

**7.2 Water by Land Use**

**Unmitigated**

|                                  | Indoor/Outdoor Use   | Total CO2     | CH4                | N2O                | CO2e          |
|----------------------------------|----------------------|---------------|--------------------|--------------------|---------------|
| Land Use                         | Mgal                 | MT/yr         |                    |                    |               |
| General Light Industry           | 0.000219 / 0         | 2.8000e-004   | 1.0000e-005        | 0.0000             | 5.1000e-004   |
| Mobile Home Park                 | 0.065154 / 0.0410754 | 0.1087        | 2.1300e-003        | 5.0000e-005        | 0.1772        |
| Other Non-Asphalt Surfaces       | 0 / 0                | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 0 / 0                | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| <b>Total</b>                     |                      | <b>0.1090</b> | <b>2.1400e-003</b> | <b>5.0000e-005</b> | <b>0.1777</b> |



Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**7.2 Water by Land Use**

**Mitigated**

|                                  | Indoor/Outdoor Use   | Total CO2     | CH4                | N2O                | CO2e          |
|----------------------------------|----------------------|---------------|--------------------|--------------------|---------------|
| Land Use                         | Mgal                 | MT/yr         |                    |                    |               |
| General Light Industry           | 0.000219 / 0         | 2.8000e-004   | 1.0000e-005        | 0.0000             | 5.1000e-004   |
| Mobile Home Park                 | 0.065154 / 0.0410754 | 0.1087        | 2.1300e-003        | 5.0000e-005        | 0.1772        |
| Other Non-Asphalt Surfaces       | 0 / 0                | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 0 / 0                | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| <b>Total</b>                     |                      | <b>0.1090</b> | <b>2.1400e-003</b> | <b>5.0000e-005</b> | <b>0.1777</b> |

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**Category/Year**

|             | Total CO2 | CH4    | N2O    | CO2e   |
|-------------|-----------|--------|--------|--------|
|             | MT/yr     |        |        |        |
| Mitigated   | 2.7221    | 0.1609 | 0.0000 | 6.7439 |
| Unmitigated | 2.7221    | 0.1609 | 0.0000 | 6.7439 |

**8.2 Waste by Land Use**

**Unmitigated**

|                                  | Waste Disposed | Total CO2     | CH4           | N2O           | CO2e          |
|----------------------------------|----------------|---------------|---------------|---------------|---------------|
| Land Use                         | tons           | MT/yr         |               |               |               |
| General Light Industry           | 12.95          | 2.6287        | 0.1554        | 0.0000        | 6.5126        |
| Mobile Home Park                 | 0.46           | 0.0934        | 5.5200e-003   | 0.0000        | 0.2313        |
| Other Non-Asphalt Surfaces       | 0              | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 0              | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| <b>Total</b>                     |                | <b>2.7221</b> | <b>0.1609</b> | <b>0.0000</b> | <b>6.7439</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**8.2 Waste by Land Use**

**Mitigated**

|                                  | Waste Disposed | Total CO2     | CH4           | N2O           | CO2e          |
|----------------------------------|----------------|---------------|---------------|---------------|---------------|
| Land Use                         | tons           | MT/yr         |               |               |               |
| General Light Industry           | 12.95          | 2.6287        | 0.1554        | 0.0000        | 6.5126        |
| Mobile Home Park                 | 0.46           | 0.0934        | 5.5200e-003   | 0.0000        | 0.2313        |
| Other Non-Asphalt Surfaces       | 0              | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Unrefrigerated Warehouse-No Rail | 0              | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| <b>Total</b>                     |                | <b>2.7221</b> | <b>0.1609</b> | <b>0.0000</b> | <b>6.7439</b> |

**9.0 Operational Offroad**

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

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

| Equipment Type      | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|------------|-------------|-------------|-----------|
| Emergency Generator | 1      | 0         | 50         | 202         | 0.73        | CNG       |

**Boilers**

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

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Annual

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

**10.1 Stationary Sources**

**Unmitigated/Mitigated**

|  | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total         | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|--|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|----------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Equipment Type                         | tons/yr       |                    |               |                    |               |                    |                    |                |                    |                    | MT/yr         |               |               |                    |               |               |
| Emergency Generator - CNG (0 - 500 HP) | 0.0444        | 4.2800e-003        | 0.1157        | 2.0000e-005        |               | 2.5000e-004        | 2.5000e-004        |                | 2.5000e-004        | 2.5000e-004        | 0.0000        | 2.5752        | 2.5752        | 5.3800e-003        | 0.0000        | 2.7098        |
| <b>Total</b>                           | <b>0.0444</b> | <b>4.2800e-003</b> | <b>0.1157</b> | <b>2.0000e-005</b> |               | <b>2.5000e-004</b> | <b>2.5000e-004</b> |                | <b>2.5000e-004</b> | <b>2.5000e-004</b> | <b>0.0000</b> | <b>2.5752</b> | <b>2.5752</b> | <b>5.3800e-003</b> | <b>0.0000</b> | <b>2.7098</b> |

**11.0 Vegetation**

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Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**Apogee Farms - Cannabis Facility  
Great Basin UAPCD Air District, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

| Land Uses                        | Size  | Metric        | Lot Acreage | Floor Surface Area | Population |
|----------------------------------|-------|---------------|-------------|--------------------|------------|
| General Light Industry           | 10.44 | 1000sqft      | 0.24        | 10,440.00          | 0          |
| Unrefrigerated Warehouse-No Rail | 0.32  | 1000sqft      | 0.01        | 320.00             | 0          |
| Other Non-Asphalt Surfaces       | 34.30 | 1000sqft      | 0.79        | 34,300.00          | 0          |
| Mobile Home Park                 | 1.00  | Dwelling Unit | 0.13        | 176.00             | 1          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          |                                |       | <b>Operational Year</b>          | 2023  |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

Project Characteristics -

Land Use - General Light Industry - Cannabis Facility; Warehouse - Storage House; Non-Asphalt Surfaces - Access and Parking Improvement; Mobile Home Park - Trailer.

Grading - Gravel will be imported to site for access and parking improvement.

Demolition -

Trips and VMT - Processing facility hauling trip - 1 trip per 150 square feet of construction, 1 trip per greenhouse, 1 trip for septic tank.

Vehicle Trips - Cannabis activity trip rate is provided by project applicant.

Road Dust - The project site will be gravelled and accounts for 3% of the traffic trip length.

Water And Wastewater - Cannabis activity water use information is provided by project applicant.

## Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

Solid Waste - Warehouse = storage house

Stationary Sources - Emergency Generators and Fire Pumps - 50 hours/year is required for back-up generator maintenance.

Construction Off-road Equipment Mitigation -

| Table Name                      | Column Name              | Default Value | New Value |
|---------------------------------|--------------------------|---------------|-----------|
| tblGrading                      | MaterialImported         | 0.00          | 600.00    |
| tblLandUse                      | LandUseSquareFeet        | 1,200.00      | 176.00    |
| tblLandUse                      | Population               | 3.00          | 1.00      |
| tblProjectCharacteristics       | UrbanizationLevel        | Urban         | Rural     |
| tblRoadDust                     | RoadPercentPave          | 100           | 97        |
| tblSolidWaste                   | SolidWasteGenerationRate | 0.30          | 0.00      |
| tblStationaryGeneratorsPumpsUse | HorsePowerValue          | 0.00          | 202.00    |
| tblStationaryGeneratorsPumpsUse | HoursPerYear             | 0.00          | 50.00     |
| tblStationaryGeneratorsPumpsUse | NumberOfEquipment        | 0.00          | 1.00      |
| tblTripsAndVMT                  | HaulingTripNumber        | 0.00          | 19.00     |
| tblTripsAndVMT                  | WorkerTripNumber         | 20.00         | 19.00     |
| tblVehicleTrips                 | ST_TR                    | 1.99          | 0.00      |
| tblVehicleTrips                 | ST_TR                    | 1.74          | 0.00      |
| tblVehicleTrips                 | SU_TR                    | 5.00          | 0.00      |
| tblVehicleTrips                 | SU_TR                    | 1.74          | 0.00      |
| tblVehicleTrips                 | WD_TR                    | 4.96          | 4.00      |
| tblVehicleTrips                 | WD_TR                    | 1.74          | 0.00      |
| tblWater                        | IndoorWaterUseRate       | 2,414,250.00  | 219.00    |
| tblWater                        | IndoorWaterUseRate       | 74,000.00     | 0.00      |

**2.0 Emissions Summary**



Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**2.2 Overall Operational**

**Unmitigated Operational**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10  | Exhaust PM10  | PM10 Total     | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2       | NBio- CO2       | Total CO2       | CH4           | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|----------------|---------------|----------------|----------------|---------------|---------------|----------------|-----------------|-----------------|---------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |                |               |                |                |               |               | lb/day         |                 |                 |               |               |                 |
| Area         | 1.8559        | 0.0309        | 1.9762        | 3.4300e-003        |                | 0.2653        | 0.2653         |                | 0.2653        | 0.2653        | 27.7717        | 11.8055         | 39.5772         | 0.0258        | 2.1800e-003   | 40.8731         |
| Energy       | 1.1900e-003   | 0.0108        | 8.6300e-003   | 7.0000e-005        |                | 8.2000e-004   | 8.2000e-004    |                | 8.2000e-004   | 8.2000e-004   |                | 13.0135         | 13.0135         | 2.5000e-004   | 2.4000e-004   | 13.0909         |
| Mobile       | 0.2102        | 0.2662        | 1.9121        | 3.9300e-003        | 11.4064        | 3.5200e-003   | 11.4100        | 1.1977         | 3.3000e-003   | 1.2010        |                | 399.1290        | 399.1290        | 0.0235        | 0.0175        | 404.9305        |
| Stationary   | 0.0000        | 0.0000        | 0.0000        | 0.0000             |                | 0.0000        | 0.0000         |                | 0.0000        | 0.0000        |                | 0.0000          | 0.0000          | 0.0000        |               | 0.0000          |
| <b>Total</b> | <b>2.0672</b> | <b>0.3079</b> | <b>3.8970</b> | <b>7.4300e-003</b> | <b>11.4064</b> | <b>0.2697</b> | <b>11.6761</b> | <b>1.1977</b>  | <b>0.2695</b> | <b>1.4672</b> | <b>27.7717</b> | <b>423.9480</b> | <b>451.7197</b> | <b>0.0495</b> | <b>0.0199</b> | <b>458.8944</b> |



Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10  | Exhaust PM10  | PM10 Total     | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2       | NBio- CO2       | Total CO2       | CH4           | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|----------------|---------------|----------------|----------------|---------------|---------------|----------------|-----------------|-----------------|---------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |                |               |                |                |               |               | lb/day         |                 |                 |               |               |                 |
| Area         | 1.8559        | 0.0309        | 1.9762        | 3.4300e-003        |                | 0.2653        | 0.2653         |                | 0.2653        | 0.2653        | 27.7717        | 11.8055         | 39.5772         | 0.0258        | 2.1800e-003   | 40.8731         |
| Energy       | 1.1900e-003   | 0.0108        | 8.6300e-003   | 7.0000e-005        |                | 8.2000e-004   | 8.2000e-004    |                | 8.2000e-004   | 8.2000e-004   |                | 13.0135         | 13.0135         | 2.5000e-004   | 2.4000e-004   | 13.0909         |
| Mobile       | 0.2102        | 0.2662        | 1.9121        | 3.9300e-003        | 11.4064        | 3.5200e-003   | 11.4100        | 1.1977         | 3.3000e-003   | 1.2010        |                | 399.1290        | 399.1290        | 0.0235        | 0.0175        | 404.9305        |
| Stationary   | 0.0000        | 0.0000        | 0.0000        | 0.0000             |                | 0.0000        | 0.0000         |                | 0.0000        | 0.0000        |                | 0.0000          | 0.0000          | 0.0000        |               | 0.0000          |
| <b>Total</b> | <b>2.0672</b> | <b>0.3079</b> | <b>3.8970</b> | <b>7.4300e-003</b> | <b>11.4064</b> | <b>0.2697</b> | <b>11.6761</b> | <b>1.1977</b>  | <b>0.2695</b> | <b>1.4672</b> | <b>27.7717</b> | <b>423.9480</b> | <b>451.7197</b> | <b>0.0495</b> | <b>0.0199</b> | <b>458.8944</b> |

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

**3.0 Construction Detail**

**Construction Phase**

| Phase Number | Phase Name            | Phase Type            | Start Date | End Date   | Num Days Week | Num Days | Phase Description |
|--------------|-----------------------|-----------------------|------------|------------|---------------|----------|-------------------|
| 1            | Demolition            | Demolition            | 1/3/2022   | 1/28/2022  | 5             | 20       |                   |
| 2            | Site Preparation      | Site Preparation      | 1/29/2022  | 2/1/2022   | 5             | 2        |                   |
| 3            | Grading               | Grading               | 2/2/2022   | 2/7/2022   | 5             | 4        |                   |
| 4            | Building Construction | Building Construction | 2/8/2022   | 11/14/2022 | 5             | 200      |                   |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

|   |                       |                       |            |            |   |    |
|---|-----------------------|-----------------------|------------|------------|---|----|
| 5 | Paving                | Paving                | 11/15/2022 | 11/28/2022 | 5 | 10 |
| 6 | Architectural Coating | Architectural Coating | 11/29/2022 | 12/12/2022 | 5 | 10 |

**Acres of Grading (Site Preparation Phase): 1.88**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0.79**

**Residential Indoor: 356; Residential Outdoor: 119; Non-Residential Indoor: 16,140; Non-Residential Outdoor: 5,380; Striped Parking Area: 2,058 (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        |
| Paving                | Cement and Mortar Mixers  | 1      | 6.00        | 9           | 0.56        |
| Demolition            | Concrete/Industrial Saws  | 1      | 8.00        | 81          | 0.73        |
| Building Construction | Cranes                    | 1      | 6.00        | 231         | 0.29        |
| Building Construction | Forklifts                 | 1      | 6.00        | 89          | 0.20        |
| Building Construction | Generator Sets            | 1      | 8.00        | 84          | 0.74        |
| Grading               | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Site Preparation      | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Paving                | Pavers                    | 1      | 6.00        | 130         | 0.42        |
| Paving                | Paving Equipment          | 1      | 8.00        | 132         | 0.36        |
| Paving                | Rollers                   | 1      | 7.00        | 80          | 0.38        |
| Demolition            | Rubber Tired Dozers       | 1      | 8.00        | 247         | 0.40        |
| Grading               | Rubber Tired Dozers       | 1      | 8.00        | 247         | 0.40        |
| Site Preparation      | Rubber Tired Dozers       | 1      | 7.00        | 247         | 0.40        |
| Building Construction | Tractors/Loaders/Backhoes | 1      | 6.00        | 97          | 0.37        |
| Demolition            | Tractors/Loaders/Backhoes | 3      | 8.00        | 97          | 0.37        |
| Grading               | Tractors/Loaders/Backhoes | 2      | 7.00        | 97          | 0.37        |
| Paving                | Tractors/Loaders/Backhoes | 1      | 8.00        | 97          | 0.37        |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

|                       |                           |   |      |    |      |
|-----------------------|---------------------------|---|------|----|------|
| Site Preparation      | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |
| Building Construction | Welders                   | 3 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            | 5                       | 13.00              | 0.00               | 2.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Site Preparation      | 3                       | 8.00               | 0.00               | 59.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Grading               | 4                       | 10.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Building Construction | 7                       | 19.00              | 7.00               | 19.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Paving                | 5                       | 13.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Architectural Coating | 1                       | 4.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |

**3.1 Mitigation Measures Construction**

Water Exposed Area

**3.2 Demolition - 2022**

**Unmitigated Construction On-Site**

|               | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |                |               |               |               |               |                    |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |                |                |               | 0.0254        | 0.0000        | 0.0254        | 3.8400e-003        | 0.0000        | 3.8400e-003   |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.6889        | 16.6217        | 13.9605        | 0.0241        |               | 0.8379        | 0.8379        |                    | 0.7829        | 0.7829        |          | 2,323.4168        | 2,323.4168        | 0.5921        |     | 2,338.2191        |
| <b>Total</b>  | <b>1.6889</b> | <b>16.6217</b> | <b>13.9605</b> | <b>0.0241</b> | <b>0.0254</b> | <b>0.8379</b> | <b>0.8633</b> | <b>3.8400e-003</b> | <b>0.7829</b> | <b>0.7867</b> |          | <b>2,323.4168</b> | <b>2,323.4168</b> | <b>0.5921</b> |     | <b>2,338.2191</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.2 Demolition - 2022**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| Hauling      | 3.5000e-004   | 0.0148        | 3.2900e-003   | 6.0000e-005        | 1.7500e-003   | 1.5000e-004        | 1.9000e-003   | 4.8000e-004    | 1.4000e-004        | 6.2000e-004   |          | 6.3914          | 6.3914          | 2.0000e-005        | 1.0000e-003        | 6.6912          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0756        | 0.0454        | 0.5811        | 1.5300e-003        | 0.1661        | 9.7000e-004        | 0.1670        | 0.0440         | 8.9000e-004        | 0.0449        |          | 154.3230        | 154.3230        | 4.3200e-003        | 4.1000e-003        | 155.6538        |
| <b>Total</b> | <b>0.0759</b> | <b>0.0603</b> | <b>0.5844</b> | <b>1.5900e-003</b> | <b>0.1678</b> | <b>1.1200e-003</b> | <b>0.1689</b> | <b>0.0445</b>  | <b>1.0300e-003</b> | <b>0.0455</b> |          | <b>160.7145</b> | <b>160.7145</b> | <b>4.3400e-003</b> | <b>5.1000e-003</b> | <b>162.3449</b> |

**Mitigated Construction On-Site**

|               | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |                |               |               |               |               |                    |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |                |                |               | 0.0114        | 0.0000        | 0.0114        | 1.7300e-003        | 0.0000        | 1.7300e-003   |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.6889        | 16.6217        | 13.9605        | 0.0241        |               | 0.8379        | 0.8379        |                    | 0.7829        | 0.7829        | 0.0000        | 2,323.4168        | 2,323.4168        | 0.5921        |     | 2,338.2191        |
| <b>Total</b>  | <b>1.6889</b> | <b>16.6217</b> | <b>13.9605</b> | <b>0.0241</b> | <b>0.0114</b> | <b>0.8379</b> | <b>0.8493</b> | <b>1.7300e-003</b> | <b>0.7829</b> | <b>0.7846</b> | <b>0.0000</b> | <b>2,323.4168</b> | <b>2,323.4168</b> | <b>0.5921</b> |     | <b>2,338.2191</b> |

## Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied****3.2 Demolition - 2022****Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| Hauling      | 3.5000e-004   | 0.0148        | 3.2900e-003   | 6.0000e-005        | 1.7500e-003   | 1.5000e-004        | 1.9000e-003   | 4.8000e-004    | 1.4000e-004        | 6.2000e-004   |          | 6.3914          | 6.3914          | 2.0000e-005        | 1.0000e-003        | 6.6912          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0756        | 0.0454        | 0.5811        | 1.5300e-003        | 0.1661        | 9.7000e-004        | 0.1670        | 0.0440         | 8.9000e-004        | 0.0449        |          | 154.3230        | 154.3230        | 4.3200e-003        | 4.1000e-003        | 155.6538        |
| <b>Total</b> | <b>0.0759</b> | <b>0.0603</b> | <b>0.5844</b> | <b>1.5900e-003</b> | <b>0.1678</b> | <b>1.1200e-003</b> | <b>0.1689</b> | <b>0.0445</b>  | <b>1.0300e-003</b> | <b>0.0455</b> |          | <b>160.7145</b> | <b>160.7145</b> | <b>4.3400e-003</b> | <b>5.1000e-003</b> | <b>162.3449</b> |

**3.3 Site Preparation - 2022****Unmitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 6.2662        | 0.0000        | 6.2662        | 3.0041         | 0.0000        | 3.0041        |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.3122        | 14.6277        | 7.0939        | 0.0172        |               | 0.6225        | 0.6225        |                | 0.5727        | 0.5727        |          | 1,666.1738        | 1,666.1738        | 0.5389        |     | 1,679.6457        |
| <b>Total</b>  | <b>1.3122</b> | <b>14.6277</b> | <b>7.0939</b> | <b>0.0172</b> | <b>6.2662</b> | <b>0.6225</b> | <b>6.8887</b> | <b>3.0041</b>  | <b>0.5727</b> | <b>3.5768</b> |          | <b>1,666.1738</b> | <b>1,666.1738</b> | <b>0.5389</b> |     | <b>1,679.6457</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.3 Site Preparation - 2022**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4                | N2O           | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|--------------------|---------------|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |                   |                   |                    |               |                   |
| Hauling      | 0.1034        | 4.3739        | 0.9702        | 0.0178        | 0.5174        | 0.0442        | 0.5616        | 0.1420         | 0.0423        | 0.1842        |          | 1,885.4759        | 1,885.4759        | 4.8200e-003        | 0.2963        | 1,973.8982        |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000         | 0.0000        | 0.0000        |          | 0.0000            | 0.0000            | 0.0000             | 0.0000        | 0.0000            |
| Worker       | 0.0465        | 0.0280        | 0.3576        | 9.4000e-004   | 0.1022        | 5.9000e-004   | 0.1028        | 0.0271         | 5.5000e-004   | 0.0277        |          | 94.9680           | 94.9680           | 2.6600e-003        | 2.5300e-003   | 95.7869           |
| <b>Total</b> | <b>0.1499</b> | <b>4.4019</b> | <b>1.3278</b> | <b>0.0188</b> | <b>0.6196</b> | <b>0.0448</b> | <b>0.6644</b> | <b>0.1691</b>  | <b>0.0428</b> | <b>0.2119</b> |          | <b>1,980.4439</b> | <b>1,980.4439</b> | <b>7.4800e-003</b> | <b>0.2989</b> | <b>2,069.6851</b> |

**Mitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 2.8198        | 0.0000        | 2.8198        | 1.3518         | 0.0000        | 1.3518        |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.3122        | 14.6277        | 7.0939        | 0.0172        |               | 0.6225        | 0.6225        |                | 0.5727        | 0.5727        | 0.0000        | 1,666.1738        | 1,666.1738        | 0.5389        |     | 1,679.6457        |
| <b>Total</b>  | <b>1.3122</b> | <b>14.6277</b> | <b>7.0939</b> | <b>0.0172</b> | <b>2.8198</b> | <b>0.6225</b> | <b>3.4423</b> | <b>1.3518</b>  | <b>0.5727</b> | <b>1.9246</b> | <b>0.0000</b> | <b>1,666.1738</b> | <b>1,666.1738</b> | <b>0.5389</b> |     | <b>1,679.6457</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.3 Site Preparation - 2022**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4                | N2O           | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|--------------------|---------------|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |                   |                   |                    |               |                   |
| Hauling      | 0.1034        | 4.3739        | 0.9702        | 0.0178        | 0.5174        | 0.0442        | 0.5616        | 0.1420         | 0.0423        | 0.1842        |          | 1,885.4759        | 1,885.4759        | 4.8200e-003        | 0.2963        | 1,973.8982        |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000         | 0.0000        | 0.0000        |          | 0.0000            | 0.0000            | 0.0000             | 0.0000        | 0.0000            |
| Worker       | 0.0465        | 0.0280        | 0.3576        | 9.4000e-004   | 0.1022        | 5.9000e-004   | 0.1028        | 0.0271         | 5.5000e-004   | 0.0277        |          | 94.9680           | 94.9680           | 2.6600e-003        | 2.5300e-003   | 95.7869           |
| <b>Total</b> | <b>0.1499</b> | <b>4.4019</b> | <b>1.3278</b> | <b>0.0188</b> | <b>0.6196</b> | <b>0.0448</b> | <b>0.6644</b> | <b>0.1691</b>  | <b>0.0428</b> | <b>0.2119</b> |          | <b>1,980.4439</b> | <b>1,980.4439</b> | <b>7.4800e-003</b> | <b>0.2989</b> | <b>2,069.6851</b> |

**3.4 Grading - 2022**

**Unmitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 7.0826        | 0.0000        | 7.0826        | 3.4247         | 0.0000        | 3.4247        |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.5403        | 16.9836        | 9.2202        | 0.0206        |               | 0.7423        | 0.7423        |                | 0.6829        | 0.6829        |          | 1,995.4825        | 1,995.4825        | 0.6454        |     | 2,011.6169        |
| <b>Total</b>  | <b>1.5403</b> | <b>16.9836</b> | <b>9.2202</b> | <b>0.0206</b> | <b>7.0826</b> | <b>0.7423</b> | <b>7.8249</b> | <b>3.4247</b>  | <b>0.6829</b> | <b>4.1076</b> |          | <b>1,995.4825</b> | <b>1,995.4825</b> | <b>0.6454</b> |     | <b>2,011.6169</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.4 Grading - 2022**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0581        | 0.0349        | 0.4470        | 1.1700e-003        | 0.1277        | 7.4000e-004        | 0.1285        | 0.0339         | 6.8000e-004        | 0.0346        |          | 118.7100        | 118.7100        | 3.3200e-003        | 3.1600e-003        | 119.7337        |
| <b>Total</b> | <b>0.0581</b> | <b>0.0349</b> | <b>0.4470</b> | <b>1.1700e-003</b> | <b>0.1277</b> | <b>7.4000e-004</b> | <b>0.1285</b> | <b>0.0339</b>  | <b>6.8000e-004</b> | <b>0.0346</b> |          | <b>118.7100</b> | <b>118.7100</b> | <b>3.3200e-003</b> | <b>3.1600e-003</b> | <b>119.7337</b> |

**Mitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 3.1872        | 0.0000        | 3.1872        | 1.5411         | 0.0000        | 1.5411        |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.5403        | 16.9836        | 9.2202        | 0.0206        |               | 0.7423        | 0.7423        |                | 0.6829        | 0.6829        | 0.0000        | 1,995.4825        | 1,995.4825        | 0.6454        |     | 2,011.6169        |
| <b>Total</b>  | <b>1.5403</b> | <b>16.9836</b> | <b>9.2202</b> | <b>0.0206</b> | <b>3.1872</b> | <b>0.7423</b> | <b>3.9294</b> | <b>1.5411</b>  | <b>0.6829</b> | <b>2.2240</b> | <b>0.0000</b> | <b>1,995.4825</b> | <b>1,995.4825</b> | <b>0.6454</b> |     | <b>2,011.6169</b> |



Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.4 Grading - 2022**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0581        | 0.0349        | 0.4470        | 1.1700e-003        | 0.1277        | 7.4000e-004        | 0.1285        | 0.0339         | 6.8000e-004        | 0.0346        |          | 118.7100        | 118.7100        | 3.3200e-003        | 3.1600e-003        | 119.7337        |
| <b>Total</b> | <b>0.0581</b> | <b>0.0349</b> | <b>0.4470</b> | <b>1.1700e-003</b> | <b>0.1277</b> | <b>7.4000e-004</b> | <b>0.1285</b> | <b>0.0339</b>  | <b>6.8000e-004</b> | <b>0.0346</b> |          | <b>118.7100</b> | <b>118.7100</b> | <b>3.3200e-003</b> | <b>3.1600e-003</b> | <b>119.7337</b> |

**3.5 Building Construction - 2022**

**Unmitigated Construction On-Site**

|              | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |                |                |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Off-Road     | 1.6487        | 12.5031        | 12.7264        | 0.0221        |               | 0.5889        | 0.5889        |                | 0.5689        | 0.5689        |          | 2,001.5429        | 2,001.5429        | 0.3486        |     | 2,010.2581        |
| <b>Total</b> | <b>1.6487</b> | <b>12.5031</b> | <b>12.7264</b> | <b>0.0221</b> |               | <b>0.5889</b> | <b>0.5889</b> |                | <b>0.5689</b> | <b>0.5689</b> |          | <b>2,001.5429</b> | <b>2,001.5429</b> | <b>0.3486</b> |     | <b>2,010.2581</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.5 Building Construction - 2022**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 3.3000e-004   | 0.0141        | 3.1200e-003   | 6.0000e-005        | 1.6700e-003   | 1.4000e-004        | 1.8100e-003   | 4.6000e-004    | 1.4000e-004        | 5.9000e-004   |          | 6.0719          | 6.0719          | 2.0000e-005        | 9.5000e-004   | 6.3566          |
| Vendor       | 0.0214        | 0.3436        | 0.1627        | 1.4300e-003        | 0.0429        | 3.0600e-003        | 0.0460        | 0.0124         | 2.9200e-003        | 0.0153        |          | 150.1078        | 150.1078        | 1.0600e-003        | 0.0196        | 155.9809        |
| Worker       | 0.1104        | 0.0664        | 0.8493        | 2.2300e-003        | 0.2427        | 1.4100e-003        | 0.2441        | 0.0644         | 1.3000e-003        | 0.0657        |          | 225.5490        | 225.5490        | 6.3100e-003        | 6.0000e-003   | 227.4940        |
| <b>Total</b> | <b>0.1322</b> | <b>0.4241</b> | <b>1.0151</b> | <b>3.7200e-003</b> | <b>0.2873</b> | <b>4.6100e-003</b> | <b>0.2919</b> | <b>0.0772</b>  | <b>4.3600e-003</b> | <b>0.0815</b> |          | <b>381.7287</b> | <b>381.7287</b> | <b>7.3900e-003</b> | <b>0.0266</b> | <b>389.8314</b> |

**Mitigated Construction On-Site**

|              | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |                |                |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Off-Road     | 1.6487        | 12.5031        | 12.7264        | 0.0221        |               | 0.5889        | 0.5889        |                | 0.5689        | 0.5689        | 0.0000        | 2,001.5429        | 2,001.5429        | 0.3486        |     | 2,010.2581        |
| <b>Total</b> | <b>1.6487</b> | <b>12.5031</b> | <b>12.7264</b> | <b>0.0221</b> |               | <b>0.5889</b> | <b>0.5889</b> |                | <b>0.5689</b> | <b>0.5689</b> | <b>0.0000</b> | <b>2,001.5429</b> | <b>2,001.5429</b> | <b>0.3486</b> |     | <b>2,010.2581</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.5 Building Construction - 2022**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 3.3000e-004   | 0.0141        | 3.1200e-003   | 6.0000e-005        | 1.6700e-003   | 1.4000e-004        | 1.8100e-003   | 4.6000e-004    | 1.4000e-004        | 5.9000e-004   |          | 6.0719          | 6.0719          | 2.0000e-005        | 9.5000e-004   | 6.3566          |
| Vendor       | 0.0214        | 0.3436        | 0.1627        | 1.4300e-003        | 0.0429        | 3.0600e-003        | 0.0460        | 0.0124         | 2.9200e-003        | 0.0153        |          | 150.1078        | 150.1078        | 1.0600e-003        | 0.0196        | 155.9809        |
| Worker       | 0.1104        | 0.0664        | 0.8493        | 2.2300e-003        | 0.2427        | 1.4100e-003        | 0.2441        | 0.0644         | 1.3000e-003        | 0.0657        |          | 225.5490        | 225.5490        | 6.3100e-003        | 6.0000e-003   | 227.4940        |
| <b>Total</b> | <b>0.1322</b> | <b>0.4241</b> | <b>1.0151</b> | <b>3.7200e-003</b> | <b>0.2873</b> | <b>4.6100e-003</b> | <b>0.2919</b> | <b>0.0772</b>  | <b>4.3600e-003</b> | <b>0.0815</b> |          | <b>381.7287</b> | <b>381.7287</b> | <b>7.3900e-003</b> | <b>0.0266</b> | <b>389.8314</b> |

**3.6 Paving - 2022**

**Unmitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Off-Road     | 0.6877        | 6.7738        | 8.8060        | 0.0135        |               | 0.3474        | 0.3474        |                | 0.3205        | 0.3205        |          | 1,297.3789        | 1,297.3789        | 0.4113        |     | 1,307.6608        |
| Paving       | 0.0000        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          |                   | 0.0000            |               |     | 0.0000            |
| <b>Total</b> | <b>0.6877</b> | <b>6.7738</b> | <b>8.8060</b> | <b>0.0135</b> |               | <b>0.3474</b> | <b>0.3474</b> |                | <b>0.3205</b> | <b>0.3205</b> |          | <b>1,297.3789</b> | <b>1,297.3789</b> | <b>0.4113</b> |     | <b>1,307.6608</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.6 Paving - 2022**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0756        | 0.0454        | 0.5811        | 1.5300e-003        | 0.1661        | 9.7000e-004        | 0.1670        | 0.0440         | 8.9000e-004        | 0.0449        |          | 154.3230        | 154.3230        | 4.3200e-003        | 4.1000e-003        | 155.6538        |
| <b>Total</b> | <b>0.0756</b> | <b>0.0454</b> | <b>0.5811</b> | <b>1.5300e-003</b> | <b>0.1661</b> | <b>9.7000e-004</b> | <b>0.1670</b> | <b>0.0440</b>  | <b>8.9000e-004</b> | <b>0.0449</b> |          | <b>154.3230</b> | <b>154.3230</b> | <b>4.3200e-003</b> | <b>4.1000e-003</b> | <b>155.6538</b> |

**Mitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Off-Road     | 0.6877        | 6.7738        | 8.8060        | 0.0135        |               | 0.3474        | 0.3474        |                | 0.3205        | 0.3205        | 0.0000        | 1,297.3789        | 1,297.3789        | 0.4113        |     | 1,307.6608        |
| Paving       | 0.0000        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |               |                   | 0.0000            |               |     | 0.0000            |
| <b>Total</b> | <b>0.6877</b> | <b>6.7738</b> | <b>8.8060</b> | <b>0.0135</b> |               | <b>0.3474</b> | <b>0.3474</b> |                | <b>0.3205</b> | <b>0.3205</b> | <b>0.0000</b> | <b>1,297.3789</b> | <b>1,297.3789</b> | <b>0.4113</b> |     | <b>1,307.6608</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.6 Paving - 2022**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0756        | 0.0454        | 0.5811        | 1.5300e-003        | 0.1661        | 9.7000e-004        | 0.1670        | 0.0440         | 8.9000e-004        | 0.0449        |          | 154.3230        | 154.3230        | 4.3200e-003        | 4.1000e-003        | 155.6538        |
| <b>Total</b> | <b>0.0756</b> | <b>0.0454</b> | <b>0.5811</b> | <b>1.5300e-003</b> | <b>0.1661</b> | <b>9.7000e-004</b> | <b>0.1670</b> | <b>0.0440</b>  | <b>8.9000e-004</b> | <b>0.0449</b> |          | <b>154.3230</b> | <b>154.3230</b> | <b>4.3200e-003</b> | <b>4.1000e-003</b> | <b>155.6538</b> |

**3.7 Architectural Coating - 2022**

**Unmitigated Construction On-Site**

|                 | ROG            | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|-----------------|----------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-----------------|-----------------|---------------|-----|-----------------|
| Category        | lb/day         |               |               |                    |               |               |               |                |               |               | lb/day   |                 |                 |               |     |                 |
| Archit. Coating | 27.8714        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          |                 | 0.0000          |               |     | 0.0000          |
| Off-Road        | 0.2045         | 1.4085        | 1.8136        | 2.9700e-003        |               | 0.0817        | 0.0817        |                | 0.0817        | 0.0817        |          | 281.4481        | 281.4481        | 0.0183        |     | 281.9062        |
| <b>Total</b>    | <b>28.0760</b> | <b>1.4085</b> | <b>1.8136</b> | <b>2.9700e-003</b> |               | <b>0.0817</b> | <b>0.0817</b> |                | <b>0.0817</b> | <b>0.0817</b> |          | <b>281.4481</b> | <b>281.4481</b> | <b>0.0183</b> |     | <b>281.9062</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.7 Architectural Coating - 2022**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0233        | 0.0140        | 0.1788        | 4.7000e-004        | 0.0511        | 3.0000e-004        | 0.0514        | 0.0136         | 2.7000e-004        | 0.0138        |          | 47.4840        | 47.4840        | 1.3300e-003        | 1.2600e-003        | 47.8935        |
| <b>Total</b> | <b>0.0233</b> | <b>0.0140</b> | <b>0.1788</b> | <b>4.7000e-004</b> | <b>0.0511</b> | <b>3.0000e-004</b> | <b>0.0514</b> | <b>0.0136</b>  | <b>2.7000e-004</b> | <b>0.0138</b> |          | <b>47.4840</b> | <b>47.4840</b> | <b>1.3300e-003</b> | <b>1.2600e-003</b> | <b>47.8935</b> |

**Mitigated Construction On-Site**

|                 | ROG            | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|-----------------|----------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|-----|-----------------|
| Category        | lb/day         |               |               |                    |               |               |               |                |               |               | lb/day        |                 |                 |               |     |                 |
| Archit. Coating | 27.8714        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |               |                 | 0.0000          |               |     | 0.0000          |
| Off-Road        | 0.2045         | 1.4085        | 1.8136        | 2.9700e-003        |               | 0.0817        | 0.0817        |                | 0.0817        | 0.0817        | 0.0000        | 281.4481        | 281.4481        | 0.0183        |     | 281.9062        |
| <b>Total</b>    | <b>28.0760</b> | <b>1.4085</b> | <b>1.8136</b> | <b>2.9700e-003</b> |               | <b>0.0817</b> | <b>0.0817</b> |                | <b>0.0817</b> | <b>0.0817</b> | <b>0.0000</b> | <b>281.4481</b> | <b>281.4481</b> | <b>0.0183</b> |     | <b>281.9062</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**3.7 Architectural Coating - 2022**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0233        | 0.0140        | 0.1788        | 4.7000e-004        | 0.0511        | 3.0000e-004        | 0.0514        | 0.0136         | 2.7000e-004        | 0.0138        |          | 47.4840        | 47.4840        | 1.3300e-003        | 1.2600e-003        | 47.8935        |
| <b>Total</b> | <b>0.0233</b> | <b>0.0140</b> | <b>0.1788</b> | <b>4.7000e-004</b> | <b>0.0511</b> | <b>3.0000e-004</b> | <b>0.0514</b> | <b>0.0136</b>  | <b>2.7000e-004</b> | <b>0.0138</b> |          | <b>47.4840</b> | <b>47.4840</b> | <b>1.3300e-003</b> | <b>1.2600e-003</b> | <b>47.8935</b> |

**4.0 Operational Detail - Mobile**

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**4.1 Mitigation Measures Mobile**

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

|             | ROG    | NOx    | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4    | N2O    | CO2e     |
|-------------|--------|--------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|--------|--------|----------|
| Category    | lb/day |        |        |             |               |              |            |                |               |             | lb/day   |           |           |        |        |          |
| Mitigated   | 0.2102 | 0.2662 | 1.9121 | 3.9300e-003 | 11.4064       | 3.5200e-003  | 11.4100    | 1.1977         | 3.3000e-003   | 1.2010      |          | 399.1290  | 399.1290  | 0.0235 | 0.0175 | 404.9305 |
| Unmitigated | 0.2102 | 0.2662 | 1.9121 | 3.9300e-003 | 11.4064       | 3.5200e-003  | 11.4100    | 1.1977         | 3.3000e-003   | 1.2010      |          | 399.1290  | 399.1290  | 0.0235 | 0.0175 | 404.9305 |

**4.2 Trip Summary Information**

| Land Use                         | Average Daily Trip Rate |             |             | Unmitigated    | Mitigated      |
|----------------------------------|-------------------------|-------------|-------------|----------------|----------------|
|                                  | Weekday                 | Saturday    | Sunday      | Annual VMT     | Annual VMT     |
| General Light Industry           | 41.76                   | 0.00        | 0.00        | 115,242        | 115,242        |
| Other Non-Asphalt Surfaces       | 0.00                    | 0.00        | 0.00        |                |                |
| Unrefrigerated Warehouse-No Rail | 0.00                    | 0.00        | 0.00        |                |                |
| Mobile Home Park                 | 5.00                    | 4.61        | 4.24        | 17,983         | 17,983         |
| <b>Total</b>                     | <b>46.76</b>            | <b>4.61</b> | <b>4.24</b> | <b>133,224</b> | <b>133,224</b> |

**4.3 Trip Type Information**

| Land Use                    | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|-----------------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                             | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| General Light Industry      | 14.70      | 6.60       | 6.60        | 59.00      | 28.00      | 13.00       | 92             | 5        | 3       |
| Other Non-Asphalt Surfaces  | 14.70      | 6.60       | 6.60        | 0.00       | 0.00       | 0.00        | 0              | 0        | 0       |
| Unrefrigerated Warehouse-No | 14.70      | 6.60       | 6.60        | 59.00      | 0.00       | 41.00       | 92             | 5        | 3       |
| Mobile Home Park            | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |

**4.4 Fleet Mix**



Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

| Land Use                         | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|----------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| General Light Industry           | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |
| Other Non-Asphalt Surfaces       | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |
| Unrefrigerated Warehouse-No Rail | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |
| Mobile Home Park                 | 0.487321 | 0.063183 | 0.199185 | 0.151211 | 0.039856 | 0.008739 | 0.004063 | 0.008601 | 0.000919 | 0.000530 | 0.030151 | 0.000719 | 0.005523 |

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

|                        | ROG         | NOx    | CO          | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total  | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e    |
|------------------------|-------------|--------|-------------|-------------|---------------|--------------|-------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|---------|
| Category               | lb/day      |        |             |             |               |              |             |                |               |             | lb/day   |           |           |             |             |         |
| NaturalGas Mitigated   | 1.1900e-003 | 0.0108 | 8.6300e-003 | 7.0000e-005 |               | 8.2000e-004  | 8.2000e-004 |                | 8.2000e-004   | 8.2000e-004 |          | 13.0135   | 13.0135   | 2.5000e-004 | 2.4000e-004 | 13.0909 |
| NaturalGas Unmitigated | 1.1900e-003 | 0.0108 | 8.6300e-003 | 7.0000e-005 |               | 8.2000e-004  | 8.2000e-004 |                | 8.2000e-004   | 8.2000e-004 |          | 13.0135   | 13.0135   | 2.5000e-004 | 2.4000e-004 | 13.0909 |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**5.2 Energy by Land Use - NaturalGas**

**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        | lb/day             |               |                    |                    |               |                    |                    |                |                    |                    | lb/day   |                |                |                    |                    |                |
| General Light Industry           | 99.5375        | 1.0700e-003        | 9.7600e-003   | 8.2000e-003        | 6.0000e-005        |               | 7.4000e-004        | 7.4000e-004        |                | 7.4000e-004        | 7.4000e-004        |          | 11.7103        | 11.7103        | 2.2000e-004        | 2.1000e-004        | 11.7799        |
| Mobile Home Park                 | 11.0776        | 1.2000e-004        | 1.0200e-003   | 4.3000e-004        | 1.0000e-005        |               | 8.0000e-005        | 8.0000e-005        |                | 8.0000e-005        | 8.0000e-005        |          | 1.3033         | 1.3033         | 2.0000e-005        | 2.0000e-005        | 1.3110         |
| Other Non-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         |
| Unrefrigerated Warehouse-No Rail | 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         |
| <b>Total</b>                     |                | <b>1.1900e-003</b> | <b>0.0108</b> | <b>8.6300e-003</b> | <b>7.0000e-005</b> |               | <b>8.2000e-004</b> | <b>8.2000e-004</b> |                | <b>8.2000e-004</b> | <b>8.2000e-004</b> |          | <b>13.0136</b> | <b>13.0136</b> | <b>2.4000e-004</b> | <b>2.3000e-004</b> | <b>13.0909</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**5.2 Energy by Land Use - NaturalGas**

**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        | lb/day             |               |                    |                    |               |                    |                    |                |                    |                    | lb/day   |                |                |                    |                    |                |
| General Light Industry           | 0.0995375      | 1.0700e-003        | 9.7600e-003   | 8.2000e-003        | 6.0000e-005        |               | 7.4000e-004        | 7.4000e-004        |                | 7.4000e-004        | 7.4000e-004        |          | 11.7103        | 11.7103        | 2.2000e-004        | 2.1000e-004        | 11.7799        |
| Mobile Home Park                 | 0.0110776      | 1.2000e-004        | 1.0200e-003   | 4.3000e-004        | 1.0000e-005        |               | 8.0000e-005        | 8.0000e-005        |                | 8.0000e-005        | 8.0000e-005        |          | 1.3033         | 1.3033         | 2.0000e-005        | 2.0000e-005        | 1.3110         |
| Other Non-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         |
| Unrefrigerated Warehouse-No Rail | 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         |
| <b>Total</b>                     |                | <b>1.1900e-003</b> | <b>0.0108</b> | <b>8.6300e-003</b> | <b>7.0000e-005</b> |               | <b>8.2000e-004</b> | <b>8.2000e-004</b> |                | <b>8.2000e-004</b> | <b>8.2000e-004</b> |          | <b>13.0136</b> | <b>13.0136</b> | <b>2.4000e-004</b> | <b>2.3000e-004</b> | <b>13.0909</b> |

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

|             | ROG    | NOx    | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4    | N2O         | CO2e    |
|-------------|--------|--------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|--------|-------------|---------|
| Category    | lb/day |        |        |             |               |              |            |                |               |             | lb/day   |           |           |        |             |         |
| Mitigated   | 1.8559 | 0.0309 | 1.9762 | 3.4300e-003 |               | 0.2653       | 0.2653     |                | 0.2653        | 0.2653      | 27.7717  | 11.8055   | 39.5772   | 0.0258 | 2.1800e-003 | 40.8731 |
| Unmitigated | 1.8559 | 0.0309 | 1.9762 | 3.4300e-003 |               | 0.2653       | 0.2653     |                | 0.2653        | 0.2653      | 27.7717  | 11.8055   | 39.5772   | 0.0258 | 2.1800e-003 | 40.8731 |

**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           | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day         |                |                |               |                    |                |
| Architectural Coating | 0.0764        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Consumer Products     | 0.2462        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Hearth                | 1.5304        | 0.0299        | 1.8891        | 3.4200e-003        |               | 0.2649        | 0.2649        |                | 0.2649        | 0.2649        | 27.7717        | 11.6471        | 39.4188        | 0.0256        | 2.1800e-003        | 40.7105        |
| Landscaping           | 2.9100e-003   | 9.9000e-004   | 0.0871        | 0.0000             |               | 4.7000e-004   | 4.7000e-004   |                | 4.7000e-004   | 4.7000e-004   |                | 0.1584         | 0.1584         | 1.7000e-004   |                    | 0.1626         |
| <b>Total</b>          | <b>1.8558</b> | <b>0.0309</b> | <b>1.9762</b> | <b>3.4200e-003</b> |               | <b>0.2653</b> | <b>0.2653</b> |                | <b>0.2653</b> | <b>0.2653</b> | <b>27.7717</b> | <b>11.8055</b> | <b>39.5772</b> | <b>0.0258</b> | <b>2.1800e-003</b> | <b>40.8731</b> |

Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2       | NBio- CO2      | Total CO2      | CH4           | N2O                | CO2e           |
|-----------------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|----------------|----------------|----------------|---------------|--------------------|----------------|
| SubCategory           | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day         |                |                |               |                    |                |
| Architectural Coating | 0.0764        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Consumer Products     | 0.2462        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                |                | 0.0000         |               |                    | 0.0000         |
| Hearth                | 1.5304        | 0.0299        | 1.8891        | 3.4200e-003        |               | 0.2649        | 0.2649        |                | 0.2649        | 0.2649        | 27.7717        | 11.6471        | 39.4188        | 0.0256        | 2.1800e-003        | 40.7105        |
| Landscaping           | 2.9100e-003   | 9.9000e-004   | 0.0871        | 0.0000             |               | 4.7000e-004   | 4.7000e-004   |                | 4.7000e-004   | 4.7000e-004   |                | 0.1584         | 0.1584         | 1.7000e-004   |                    | 0.1626         |
| <b>Total</b>          | <b>1.8558</b> | <b>0.0309</b> | <b>1.9762</b> | <b>3.4200e-003</b> |               | <b>0.2653</b> | <b>0.2653</b> |                | <b>0.2653</b> | <b>0.2653</b> | <b>27.7717</b> | <b>11.8055</b> | <b>39.5772</b> | <b>0.0258</b> | <b>2.1800e-003</b> | <b>40.8731</b> |

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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

**10.0 Stationary Equipment**

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Apogee Farms - Cannabis Facility - Great Basin UAPCD Air District, Summer

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

**Fire Pumps and Emergency Generators**

| Equipment Type      | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|------------|-------------|-------------|-----------|
| Emergency Generator | 1      | 0         | 50         | 202         | 0.73        | CNG       |

**Boilers**

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

**10.1 Stationary Sources**

**Unmitigated/Mitigated**

|  | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2     | Total CO2     | CH4           | N2O | CO2e          |
|--|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|---------------|---------------|---------------|-----|---------------|
| Equipment Type                         | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |               |               |               |     |               |
| Emergency Generator - CNG (0 - 500 HP) | 0.0000        | 0.0000        | 0.0000        | 0.0000        |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          | 0.0000        | 0.0000        | 0.0000        |     | 0.0000        |
| <b>Total</b>                           | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |               | <b>0.0000</b> | <b>0.0000</b> |                | <b>0.0000</b> | <b>0.0000</b> |          | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |     | <b>0.0000</b> |

**11.0 Vegetation**

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Apogee-Field Crops - Great Basin UAPCD Air District, Annual

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

**Apogee-Field Crops  
Great Basin UAPCD Air District, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

| Land Uses                        | Size  | Metric        | Lot Acreage | Floor Surface Area | Population |
|----------------------------------|-------|---------------|-------------|--------------------|------------|
| Unrefrigerated Warehouse-No Rail | 13.20 | 1000sqft      | 0.30        | 13,200.00          | 0          |
| Single Family Housing            | 2.00  | Dwelling Unit | 0.65        | 4,000.00           | 6          |
| Condo/Townhouse                  | 2.00  | Dwelling Unit | 0.13        | 2,000.00           | 6          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          | <b>Operational Year</b>        | 2025  |                                  |       |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

Project Characteristics -

Land Use - Single Family Housing - Single Family Dwelling Units; Condo - Accessory Dwelling Units; Warehouse - Farm Shop

Demolition -

Trips and VMT - Building construction materials hauling trip - 1 trip per 150 square feet of construction.

Water And Wastewater - Warehouse = water use for highwater demand crops.

Operational Off-Road Equipment - Off-road equipment = typical equipment needed for farm activities.

Stationary Sources - Emergency Generators and Fire Pumps - 50 hours/year is required for back-up generator maintenance.

Construction Off-road Equipment Mitigation -

Apogee-Field Crops - Great Basin UAPCD Air District, Annual

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

| Table Name                      | Column Name                | Default Value | New Value |
|---------------------------------|----------------------------|---------------|-----------|
| tblLandUse                      | LandUseSquareFeet          | 3,600.00      | 4,000.00  |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 4.00      |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 2.00      |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 4.00      |
| tblOperationalOffRoadEquipment  | OperLoadFactor             | 0.20          | 0.20      |
| tblOperationalOffRoadEquipment  | OperLoadFactor             | 0.38          | 0.38      |
| tblOperationalOffRoadEquipment  | OperLoadFactor             | 0.37          | 0.37      |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00      |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00      |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00      |
| tblProjectCharacteristics       | UrbanizationLevel          | Urban         | Rural     |
| tblStationaryGeneratorsPumpsUse | HorsePowerValue            | 0.00          | 202.00    |
| tblStationaryGeneratorsPumpsUse | HoursPerYear               | 0.00          | 50.00     |
| tblStationaryGeneratorsPumpsUse | NumberOfEquipment          | 0.00          | 1.00      |
| tblTripsAndVMT                  | HaulingTripNumber          | 2.00          | 49.00     |
| tblTripsAndVMT                  | HaulingTripNumber          | 0.00          | 128.00    |
| tblTripsAndVMT                  | WorkerTripNumber           | 13.00         | 10.00     |
| tblTripsAndVMT                  | WorkerTripNumber           | 8.00          | 5.00      |
| tblTripsAndVMT                  | WorkerTripNumber           | 10.00         | 8.00      |
| tblTripsAndVMT                  | WorkerTripNumber           | 13.00         | 18.00     |
| tblWater                        | OutdoorWaterUseRate        | 0.00          | 9,874.27  |

**2.0 Emissions Summary**

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Apogee-Field Crops - Great Basin UAPCD Air District, Annual

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

| Quarter | Start Date | End Date  | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---------|------------|-----------|--|--|
| 1       | 1-2-2024   | 4-1-2024  | 0.4505                                       | 0.4505                                     |
| 2       | 4-2-2024   | 7-1-2024  | 0.4149                                       | 0.4149                                     |
| 3       | 7-2-2024   | 9-30-2024 | 0.4149                                       | 0.4149                                     |
|         |            | Highest   | 0.4505                                       | 0.4505                                     |

**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         | 0.3516        | 5.2400e-003   | 0.3396        | 5.6000e-004        |               | 0.0436        | 0.0436        |                | 0.0436        | 0.0436        | 4.1318        | 1.7816          | 5.9134          | 3.8600e-003   | 3.2000e-004        | 6.1068          |
| Energy       | 1.7000e-004   | 1.4800e-003   | 6.3000e-004   | 1.0000e-005        |               | 1.2000e-004   | 1.2000e-004   |                | 1.2000e-004   | 1.2000e-004   | 0.0000        | 6.3116          | 6.3116          | 4.2000e-004   | 8.0000e-005        | 6.3455          |
| Mobile       | 0.0398        | 0.0535        | 0.3839        | 7.6000e-004        | 0.0788        | 6.8000e-004   | 0.0795        | 0.0211         | 6.3000e-004   | 0.0217        | 0.0000        | 70.3276         | 70.3276         | 4.4700e-003   | 3.2900e-003        | 71.4193         |
| Offroad      | 0.0298        | 0.2335        | 0.3225        | 7.3000e-004        |               | 9.7100e-003   | 9.7100e-003   |                | 8.9300e-003   | 8.9300e-003   | 0.0000        | 64.4296         | 64.4296         | 0.0208        | 0.0000             | 64.9505         |
| Stationary   | 0.0444        | 4.2800e-003   | 0.1157        | 2.0000e-005        |               | 2.5000e-004   | 2.5000e-004   |                | 2.5000e-004   | 2.5000e-004   | 0.0000        | 2.5752          | 2.5752          | 5.3800e-003   | 0.0000             | 2.7098          |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 3.0104        | 0.0000          | 3.0104          | 0.1779        | 0.0000             | 7.4580          |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 1.0511        | 3.2874          | 4.3385          | 0.1082        | 2.5800e-003        | 7.8141          |
| <b>Total</b> | <b>0.4658</b> | <b>0.2980</b> | <b>1.1623</b> | <b>2.0800e-003</b> | <b>0.0788</b> | <b>0.0544</b> | <b>0.1332</b> | <b>0.0211</b>  | <b>0.0535</b> | <b>0.0746</b> | <b>8.1933</b> | <b>148.7129</b> | <b>156.9062</b> | <b>0.3211</b> | <b>6.2700e-003</b> | <b>166.8040</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Annual

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|--------------------|-----------------|
| Category     | tons/yr       |               |               |                    |               |               |               |                |               |               | MT/yr         |                 |                 |               |                    |                 |
| Area         | 0.3516        | 5.2400e-003   | 0.3396        | 5.6000e-004        |               | 0.0436        | 0.0436        |                | 0.0436        | 0.0436        | 4.1318        | 1.7816          | 5.9134          | 3.8600e-003   | 3.2000e-004        | 6.1068          |
| Energy       | 1.7000e-004   | 1.4800e-003   | 6.3000e-004   | 1.0000e-005        |               | 1.2000e-004   | 1.2000e-004   |                | 1.2000e-004   | 1.2000e-004   | 0.0000        | 6.3116          | 6.3116          | 4.2000e-004   | 8.0000e-005        | 6.3455          |
| Mobile       | 0.0398        | 0.0535        | 0.3839        | 7.6000e-004        | 0.0788        | 6.8000e-004   | 0.0795        | 0.0211         | 6.3000e-004   | 0.0217        | 0.0000        | 70.3276         | 70.3276         | 4.4700e-003   | 3.2900e-003        | 71.4193         |
| Offroad      | 0.0298        | 0.2335        | 0.3225        | 7.3000e-004        |               | 9.7100e-003   | 9.7100e-003   |                | 8.9300e-003   | 8.9300e-003   | 0.0000        | 64.4296         | 64.4296         | 0.0208        | 0.0000             | 64.9505         |
| Stationary   | 0.0444        | 4.2800e-003   | 0.1157        | 2.0000e-005        |               | 2.5000e-004   | 2.5000e-004   |                | 2.5000e-004   | 2.5000e-004   | 0.0000        | 2.5752          | 2.5752          | 5.3800e-003   | 0.0000             | 2.7098          |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 3.0104        | 0.0000          | 3.0104          | 0.1779        | 0.0000             | 7.4580          |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 1.0511        | 3.2874          | 4.3385          | 0.1082        | 2.5800e-003        | 7.8141          |
| <b>Total</b> | <b>0.4658</b> | <b>0.2980</b> | <b>1.1623</b> | <b>2.0800e-003</b> | <b>0.0788</b> | <b>0.0544</b> | <b>0.1332</b> | <b>0.0211</b>  | <b>0.0535</b> | <b>0.0746</b> | <b>8.1933</b> | <b>148.7129</b> | <b>156.9062</b> | <b>0.3211</b> | <b>6.2700e-003</b> | <b>166.8040</b> |

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

**3.0 Construction Detail**

**Construction Phase**

Apogee-Field Crops - Great Basin UAPCD Air District, Annual

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

| Phase Number | Phase Name            | Phase Type            | Start Date | End Date   | Num Days Week | Num Days | Phase Description |
|--------------|-----------------------|-----------------------|------------|------------|---------------|----------|-------------------|
| 1            | Demolition            | Demolition            | 1/2/2024   | 1/29/2024  | 5             | 20       |                   |
| 2            | Site Preparation      | Site Preparation      | 1/30/2024  | 1/31/2024  | 5             | 2        |                   |
| 3            | Grading               | Grading               | 2/1/2024   | 2/6/2024   | 5             | 4        |                   |
| 4            | Building Construction | Building Construction | 2/7/2024   | 11/12/2024 | 5             | 200      |                   |
| 5            | Paving                | Paving                | 11/13/2024 | 11/26/2024 | 5             | 10       |                   |
| 6            | Architectural Coating | Architectural Coating | 11/27/2024 | 12/10/2024 | 5             | 10       |                   |

**Acres of Grading (Site Preparation Phase): 1.88**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

**Residential Indoor: 12,150; Residential Outdoor: 4,050; Non-Residential Indoor: 19,800; Non-Residential Outdoor: 6,600; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name            | Offroad Equipment Type   | Amount | Usage Hours | Horse Power | Load Factor |
|-----------------------|--------------------------|--------|-------------|-------------|-------------|
| Architectural Coating | Air Compressors          | 1      | 6.00        | 78          | 0.48        |
| Paving                | Cement and Mortar Mixers | 1      | 6.00        | 9           | 0.56        |
| Demolition            | Concrete/Industrial Saws | 1      | 8.00        | 81          | 0.73        |
| Building Construction | Cranes                   | 1      | 6.00        | 231         | 0.29        |
| Building Construction | Forklifts                | 1      | 6.00        | 89          | 0.20        |
| Building Construction | Generator Sets           | 1      | 8.00        | 84          | 0.74        |
| Grading               | Graders                  | 1      | 8.00        | 187         | 0.41        |
| Site Preparation      | Graders                  | 1      | 8.00        | 187         | 0.41        |
| Paving                | Pavers                   | 1      | 6.00        | 130         | 0.42        |
| Paving                | Paving Equipment         | 1      | 8.00        | 132         | 0.36        |
| Paving                | Rollers                  | 1      | 7.00        | 80          | 0.38        |
| Demolition            | Rubber Tired Dozers      | 1      | 8.00        | 247         | 0.40        |

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

|                       |                           |   |      |     |      |
|-----------------------|---------------------------|---|------|-----|------|
| Grading               | Rubber Tired Dozers       | 1 | 8.00 | 247 | 0.40 |
| Site Preparation      | Rubber Tired Dozers       | 1 | 7.00 | 247 | 0.40 |
| Building Construction | Tractors/Loaders/Backhoes | 1 | 6.00 | 97  | 0.37 |
| Demolition            | Tractors/Loaders/Backhoes | 3 | 8.00 | 97  | 0.37 |
| Grading               | Tractors/Loaders/Backhoes | 2 | 7.00 | 97  | 0.37 |
| Paving                | Tractors/Loaders/Backhoes | 1 | 8.00 | 97  | 0.37 |
| Site Preparation      | Tractors/Loaders/Backhoes | 1 | 8.00 | 97  | 0.37 |
| Building Construction | Welders                   | 3 | 8.00 | 46  | 0.45 |

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            | 5                       | 10.00              | 0.00               | 49.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Site Preparation      | 3                       | 5.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Grading               | 4                       | 8.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Building Construction | 7                       | 8.00               | 3.00               | 128.00              | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Paving                | 5                       | 18.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Architectural Coating | 1                       | 2.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |

**3.1 Mitigation Measures Construction**

Water Exposed Area

Apogee-Field Crops - Great Basin UAPCD Air District, Annual

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

**3.2 Demolition - 2024**

**Unmitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2                | Fugitive PM10      | Exhaust PM10       | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2      | Total CO2      | CH4                | N2O           | CO2e           |
|---------------|---------------|---------------|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|----------------|----------------|--------------------|---------------|----------------|
| Category      | tons/yr       |               |               |                    |                    |                    |                    |                    |                    |                    | MT/yr         |                |                |                    |               |                |
| Fugitive Dust |               |               |               |                    | 2.5000e-004        | 0.0000             | 2.5000e-004        | 4.0000e-005        | 0.0000             | 4.0000e-005        | 0.0000        | 0.0000         | 0.0000         | 0.0000             | 0.0000        | 0.0000         |
| Off-Road      | 0.0144        | 0.1389        | 0.1349        | 2.4000e-004        |                    | 6.3100e-003        | 6.3100e-003        |                    | 5.8900e-003        | 5.8900e-003        | 0.0000        | 21.0916        | 21.0916        | 5.3400e-003        | 0.0000        | 21.2250        |
| <b>Total</b>  | <b>0.0144</b> | <b>0.1389</b> | <b>0.1349</b> | <b>2.4000e-004</b> | <b>2.5000e-004</b> | <b>6.3100e-003</b> | <b>6.5600e-003</b> | <b>4.0000e-005</b> | <b>5.8900e-003</b> | <b>5.9300e-003</b> | <b>0.0000</b> | <b>21.0916</b> | <b>21.0916</b> | <b>5.3400e-003</b> | <b>0.0000</b> | <b>21.2250</b> |

**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      | 7.0000e-005        | 3.3100e-003        | 8.1000e-004        | 1.0000e-005        | 4.2000e-004        | 3.0000e-005        | 4.5000e-004        | 1.1000e-004        | 3.0000e-005        | 1.5000e-004        | 0.0000        | 1.3450        | 1.3450        | 0.0000             | 2.1000e-004        | 1.4080        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Worker       | 5.1000e-004        | 3.2000e-004        | 3.6200e-003        | 1.0000e-005        | 1.2400e-003        | 1.0000e-005        | 1.2400e-003        | 3.3000e-004        | 1.0000e-005        | 3.3000e-004        | 0.0000        | 0.9686        | 0.9686        | 3.0000e-005        | 3.0000e-005        | 0.9772        |
| <b>Total</b> | <b>5.8000e-004</b> | <b>3.6300e-003</b> | <b>4.4300e-003</b> | <b>2.0000e-005</b> | <b>1.6600e-003</b> | <b>4.0000e-005</b> | <b>1.6900e-003</b> | <b>4.4000e-004</b> | <b>4.0000e-005</b> | <b>4.8000e-004</b> | <b>0.0000</b> | <b>2.3136</b> | <b>2.3136</b> | <b>3.0000e-005</b> | <b>2.4000e-004</b> | <b>2.3853</b> |

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

**3.2 Demolition - 2024**

**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 |               |               |               |                    | 1.1000e-004        | 0.0000             | 1.1000e-004        | 2.0000e-005        | 0.0000             | 2.0000e-005        | 0.0000        | 0.0000         | 0.0000         | 0.0000             | 0.0000        | 0.0000         |
| Off-Road      | 0.0144        | 0.1389        | 0.1349        | 2.4000e-004        |                    | 6.3100e-003        | 6.3100e-003        |                    | 5.8900e-003        | 5.8900e-003        | 0.0000        | 21.0915        | 21.0915        | 5.3400e-003        | 0.0000        | 21.2250        |
| <b>Total</b>  | <b>0.0144</b> | <b>0.1389</b> | <b>0.1349</b> | <b>2.4000e-004</b> | <b>1.1000e-004</b> | <b>6.3100e-003</b> | <b>6.4200e-003</b> | <b>2.0000e-005</b> | <b>5.8900e-003</b> | <b>5.9100e-003</b> | <b>0.0000</b> | <b>21.0915</b> | <b>21.0915</b> | <b>5.3400e-003</b> | <b>0.0000</b> | <b>21.2250</b> |

**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      | 7.0000e-005        | 3.3100e-003        | 8.1000e-004        | 1.0000e-005        | 4.2000e-004        | 3.0000e-005        | 4.5000e-004        | 1.1000e-004        | 3.0000e-005        | 1.5000e-004        | 0.0000        | 1.3450        | 1.3450        | 0.0000             | 2.1000e-004        | 1.4080        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Worker       | 5.1000e-004        | 3.2000e-004        | 3.6200e-003        | 1.0000e-005        | 1.2400e-003        | 1.0000e-005        | 1.2400e-003        | 3.3000e-004        | 1.0000e-005        | 3.3000e-004        | 0.0000        | 0.9686        | 0.9686        | 3.0000e-005        | 3.0000e-005        | 0.9772        |
| <b>Total</b> | <b>5.8000e-004</b> | <b>3.6300e-003</b> | <b>4.4300e-003</b> | <b>2.0000e-005</b> | <b>1.6600e-003</b> | <b>4.0000e-005</b> | <b>1.6900e-003</b> | <b>4.4000e-004</b> | <b>4.0000e-005</b> | <b>4.8000e-004</b> | <b>0.0000</b> | <b>2.3136</b> | <b>2.3136</b> | <b>3.0000e-005</b> | <b>2.4000e-004</b> | <b>2.3853</b> |

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

**3.3 Site Preparation - 2024**

**Unmitigated Construction On-Site**

|               | ROG                | NOx           | CO                 | SO2                | Fugitive PM10      | Exhaust PM10       | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|---------------|--------------------|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category      | tons/yr            |               |                    |                    |                    |                    |                    |                    |                    |                    | MT/yr         |               |               |                    |               |               |
| Fugitive Dust |                    |               |                    |                    | 6.2700e-003        | 0.0000             | 6.2700e-003        | 3.0000e-003        | 0.0000             | 3.0000e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 1.1100e-003        | 0.0118        | 6.6300e-003        | 2.0000e-005        |                    | 4.8000e-004        | 4.8000e-004        |                    | 4.4000e-004        | 4.4000e-004        | 0.0000        | 1.5113        | 1.5113        | 4.9000e-004        | 0.0000        | 1.5235        |
| <b>Total</b>  | <b>1.1100e-003</b> | <b>0.0118</b> | <b>6.6300e-003</b> | <b>2.0000e-005</b> | <b>6.2700e-003</b> | <b>4.8000e-004</b> | <b>6.7500e-003</b> | <b>3.0000e-003</b> | <b>4.4000e-004</b> | <b>3.4400e-003</b> | <b>0.0000</b> | <b>1.5113</b> | <b>1.5113</b> | <b>4.9000e-004</b> | <b>0.0000</b> | <b>1.5235</b> |

**Unmitigated Construction Off-Site**

|              | ROG                | NOx                | CO                 | SO2           | Fugitive PM10      | Exhaust PM10  | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4           | N2O           | CO2e          |
|--------------|--------------------|--------------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Category     | tons/yr            |                    |                    |               |                    |               |                    |                    |               |                    | MT/yr         |               |               |               |               |               |
| Hauling      | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Worker       | 3.0000e-005        | 2.0000e-005        | 1.8000e-004        | 0.0000        | 6.0000e-005        | 0.0000        | 6.0000e-005        | 2.0000e-005        | 0.0000        | 2.0000e-005        | 0.0000        | 0.0484        | 0.0484        | 0.0000        | 0.0000        | 0.0489        |
| <b>Total</b> | <b>3.0000e-005</b> | <b>2.0000e-005</b> | <b>1.8000e-004</b> | <b>0.0000</b> | <b>6.0000e-005</b> | <b>0.0000</b> | <b>6.0000e-005</b> | <b>2.0000e-005</b> | <b>0.0000</b> | <b>2.0000e-005</b> | <b>0.0000</b> | <b>0.0484</b> | <b>0.0484</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0489</b> |



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

**3.3 Site Preparation - 2024**

**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 |                    |               |                    |                    | 2.8200e-003        | 0.0000             | 2.8200e-003        | 1.3500e-003        | 0.0000             | 1.3500e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 1.1100e-003        | 0.0118        | 6.6300e-003        | 2.0000e-005        |                    | 4.8000e-004        | 4.8000e-004        |                    | 4.4000e-004        | 4.4000e-004        | 0.0000        | 1.5113        | 1.5113        | 4.9000e-004        | 0.0000        | 1.5235        |
| <b>Total</b>  | <b>1.1100e-003</b> | <b>0.0118</b> | <b>6.6300e-003</b> | <b>2.0000e-005</b> | <b>2.8200e-003</b> | <b>4.8000e-004</b> | <b>3.3000e-003</b> | <b>1.3500e-003</b> | <b>4.4000e-004</b> | <b>1.7900e-003</b> | <b>0.0000</b> | <b>1.5113</b> | <b>1.5113</b> | <b>4.9000e-004</b> | <b>0.0000</b> | <b>1.5235</b> |

**Mitigated Construction Off-Site**

|              | ROG                | NOx                | CO                 | SO2           | Fugitive PM10      | Exhaust PM10  | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4           | N2O           | CO2e          |
|--------------|--------------------|--------------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Category     | tons/yr            |                    |                    |               |                    |               |                    |                    |               |                    | MT/yr         |               |               |               |               |               |
| Hauling      | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Worker       | 3.0000e-005        | 2.0000e-005        | 1.8000e-004        | 0.0000        | 6.0000e-005        | 0.0000        | 6.0000e-005        | 2.0000e-005        | 0.0000        | 2.0000e-005        | 0.0000        | 0.0484        | 0.0484        | 0.0000        | 0.0000        | 0.0489        |
| <b>Total</b> | <b>3.0000e-005</b> | <b>2.0000e-005</b> | <b>1.8000e-004</b> | <b>0.0000</b> | <b>6.0000e-005</b> | <b>0.0000</b> | <b>6.0000e-005</b> | <b>2.0000e-005</b> | <b>0.0000</b> | <b>2.0000e-005</b> | <b>0.0000</b> | <b>0.0484</b> | <b>0.0484</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0489</b> |

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

**3.4 Grading - 2024**

**Unmitigated Construction On-Site**

|               | ROG                | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|---------------|--------------------|---------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category      | tons/yr            |               |               |                    |               |                    |               |                    |                    |                    | MT/yr         |               |               |                    |               |               |
| Fugitive Dust |                    |               |               |                    | 0.0142        | 0.0000             | 0.0142        | 6.8500e-003        | 0.0000             | 6.8500e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 2.6000e-003        | 0.0276        | 0.0174        | 4.0000e-005        |               | 1.1400e-003        | 1.1400e-003   |                    | 1.0500e-003        | 1.0500e-003        | 0.0000        | 3.6207        | 3.6207        | 1.1700e-003        | 0.0000        | 3.6500        |
| <b>Total</b>  | <b>2.6000e-003</b> | <b>0.0276</b> | <b>0.0174</b> | <b>4.0000e-005</b> | <b>0.0142</b> | <b>1.1400e-003</b> | <b>0.0153</b> | <b>6.8500e-003</b> | <b>1.0500e-003</b> | <b>7.9000e-003</b> | <b>0.0000</b> | <b>3.6207</b> | <b>3.6207</b> | <b>1.1700e-003</b> | <b>0.0000</b> | <b>3.6500</b> |

**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       | 8.0000e-005        | 5.0000e-005        | 5.8000e-004        | 0.0000        | 2.0000e-004        | 0.0000        | 2.0000e-004        | 5.0000e-005        | 0.0000        | 5.0000e-005        | 0.0000        | 0.1550        | 0.1550        | 0.0000        | 0.0000        | 0.1564        |
| <b>Total</b> | <b>8.0000e-005</b> | <b>5.0000e-005</b> | <b>5.8000e-004</b> | <b>0.0000</b> | <b>2.0000e-004</b> | <b>0.0000</b> | <b>2.0000e-004</b> | <b>5.0000e-005</b> | <b>0.0000</b> | <b>5.0000e-005</b> | <b>0.0000</b> | <b>0.1550</b> | <b>0.1550</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.1564</b> |

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

**3.4 Grading - 2024**

**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 |                    |               |               |                    | 6.3700e-003        | 0.0000             | 6.3700e-003        | 3.0800e-003        | 0.0000             | 3.0800e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 2.6000e-003        | 0.0276        | 0.0174        | 4.0000e-005        |                    | 1.1400e-003        | 1.1400e-003        |                    | 1.0500e-003        | 1.0500e-003        | 0.0000        | 3.6207        | 3.6207        | 1.1700e-003        | 0.0000        | 3.6500        |
| <b>Total</b>  | <b>2.6000e-003</b> | <b>0.0276</b> | <b>0.0174</b> | <b>4.0000e-005</b> | <b>6.3700e-003</b> | <b>1.1400e-003</b> | <b>7.5100e-003</b> | <b>3.0800e-003</b> | <b>1.0500e-003</b> | <b>4.1300e-003</b> | <b>0.0000</b> | <b>3.6207</b> | <b>3.6207</b> | <b>1.1700e-003</b> | <b>0.0000</b> | <b>3.6500</b> |

**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       | 8.0000e-005        | 5.0000e-005        | 5.8000e-004        | 0.0000        | 2.0000e-004        | 0.0000        | 2.0000e-004        | 5.0000e-005        | 0.0000        | 5.0000e-005        | 0.0000        | 0.1550        | 0.1550        | 0.0000        | 0.0000        | 0.1564        |
| <b>Total</b> | <b>8.0000e-005</b> | <b>5.0000e-005</b> | <b>5.8000e-004</b> | <b>0.0000</b> | <b>2.0000e-004</b> | <b>0.0000</b> | <b>2.0000e-004</b> | <b>5.0000e-005</b> | <b>0.0000</b> | <b>5.0000e-005</b> | <b>0.0000</b> | <b>0.1550</b> | <b>0.1550</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.1564</b> |

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

**3.5 Building Construction - 2024**

**Unmitigated Construction 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     | 0.1420        | 1.1064        | 1.2517        | 2.2100e-003        |               | 0.0451        | 0.0451        |                | 0.0435        | 0.0435        | 0.0000        | 181.6113        | 181.6113        | 0.0302        | 0.0000        | 182.3674        |
| <b>Total</b> | <b>0.1420</b> | <b>1.1064</b> | <b>1.2517</b> | <b>2.2100e-003</b> |               | <b>0.0451</b> | <b>0.0451</b> |                | <b>0.0435</b> | <b>0.0435</b> | <b>0.0000</b> | <b>181.6113</b> | <b>181.6113</b> | <b>0.0302</b> | <b>0.0000</b> | <b>182.3674</b> |

**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      | 1.7000e-004        | 8.6400e-003   | 2.1200e-003   | 4.0000e-005        | 1.0900e-003   | 8.0000e-005        | 1.1800e-003   | 3.0000e-004        | 8.0000e-005        | 3.8000e-004        | 0.0000        | 3.5134         | 3.5134         | 1.0000e-005        | 5.5000e-004        | 3.6781         |
| Vendor       | 7.0000e-004        | 0.0132        | 6.3300e-003   | 6.0000e-005        | 1.7900e-003   | 9.0000e-005        | 1.8800e-003   | 5.2000e-004        | 8.0000e-005        | 6.0000e-004        | 0.0000        | 5.5810         | 5.5810         | 3.0000e-005        | 7.2000e-004        | 5.7968         |
| Worker       | 4.0700e-003        | 2.5300e-003   | 0.0289        | 8.0000e-005        | 9.8900e-003   | 5.0000e-005        | 9.9400e-003   | 2.6300e-003        | 5.0000e-005        | 2.6800e-003        | 0.0000        | 7.7489         | 7.7489         | 2.1000e-004        | 2.1000e-004        | 7.8180         |
| <b>Total</b> | <b>4.9400e-003</b> | <b>0.0244</b> | <b>0.0374</b> | <b>1.8000e-004</b> | <b>0.0128</b> | <b>2.2000e-004</b> | <b>0.0130</b> | <b>3.4500e-003</b> | <b>2.1000e-004</b> | <b>3.6600e-003</b> | <b>0.0000</b> | <b>16.8433</b> | <b>16.8433</b> | <b>2.5000e-004</b> | <b>1.4800e-003</b> | <b>17.2929</b> |

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

**3.5 Building Construction - 2024**

**Mitigated Construction 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     | 0.1420        | 1.1064        | 1.2517        | 2.2100e-003        |               | 0.0451        | 0.0451        |                | 0.0435        | 0.0435        | 0.0000        | 181.6110        | 181.6110        | 0.0302        | 0.0000        | 182.3672        |
| <b>Total</b> | <b>0.1420</b> | <b>1.1064</b> | <b>1.2517</b> | <b>2.2100e-003</b> |               | <b>0.0451</b> | <b>0.0451</b> |                | <b>0.0435</b> | <b>0.0435</b> | <b>0.0000</b> | <b>181.6110</b> | <b>181.6110</b> | <b>0.0302</b> | <b>0.0000</b> | <b>182.3672</b> |

**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      | 1.7000e-004        | 8.6400e-003   | 2.1200e-003   | 4.0000e-005        | 1.0900e-003   | 8.0000e-005        | 1.1800e-003   | 3.0000e-004        | 8.0000e-005        | 3.8000e-004        | 0.0000        | 3.5134         | 3.5134         | 1.0000e-005        | 5.5000e-004        | 3.6781         |
| Vendor       | 7.0000e-004        | 0.0132        | 6.3300e-003   | 6.0000e-005        | 1.7900e-003   | 9.0000e-005        | 1.8800e-003   | 5.2000e-004        | 8.0000e-005        | 6.0000e-004        | 0.0000        | 5.5810         | 5.5810         | 3.0000e-005        | 7.2000e-004        | 5.7968         |
| Worker       | 4.0700e-003        | 2.5300e-003   | 0.0289        | 8.0000e-005        | 9.8900e-003   | 5.0000e-005        | 9.9400e-003   | 2.6300e-003        | 5.0000e-005        | 2.6800e-003        | 0.0000        | 7.7489         | 7.7489         | 2.1000e-004        | 2.1000e-004        | 7.8180         |
| <b>Total</b> | <b>4.9400e-003</b> | <b>0.0244</b> | <b>0.0374</b> | <b>1.8000e-004</b> | <b>0.0128</b> | <b>2.2000e-004</b> | <b>0.0130</b> | <b>3.4500e-003</b> | <b>2.1000e-004</b> | <b>3.6600e-003</b> | <b>0.0000</b> | <b>16.8433</b> | <b>16.8433</b> | <b>2.5000e-004</b> | <b>1.4800e-003</b> | <b>17.2929</b> |

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

**3.6 Paving - 2024**

**Unmitigated Construction 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     | 3.0900e-003        | 0.0293        | 0.0441        | 7.0000e-005        |               | 1.4100e-003        | 1.4100e-003        |                | 1.3000e-003        | 1.3000e-003        | 0.0000        | 5.8870        | 5.8870        | 1.8700e-003        | 0.0000        | 5.9337        |
| Paving       | 0.0000             |               |               |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| <b>Total</b> | <b>3.0900e-003</b> | <b>0.0293</b> | <b>0.0441</b> | <b>7.0000e-005</b> |               | <b>1.4100e-003</b> | <b>1.4100e-003</b> |                | <b>1.3000e-003</b> | <b>1.3000e-003</b> | <b>0.0000</b> | <b>5.8870</b> | <b>5.8870</b> | <b>1.8700e-003</b> | <b>0.0000</b> | <b>5.9337</b> |

**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       | 4.6000e-004        | 2.9000e-004        | 3.2600e-003        | 1.0000e-005        | 1.1100e-003        | 1.0000e-005        | 1.1200e-003        | 3.0000e-004        | 1.0000e-005        | 3.0000e-004        | 0.0000        | 0.8718        | 0.8718        | 2.0000e-005        | 2.0000e-005        | 0.8795        |
| <b>Total</b> | <b>4.6000e-004</b> | <b>2.9000e-004</b> | <b>3.2600e-003</b> | <b>1.0000e-005</b> | <b>1.1100e-003</b> | <b>1.0000e-005</b> | <b>1.1200e-003</b> | <b>3.0000e-004</b> | <b>1.0000e-005</b> | <b>3.0000e-004</b> | <b>0.0000</b> | <b>0.8718</b> | <b>0.8718</b> | <b>2.0000e-005</b> | <b>2.0000e-005</b> | <b>0.8795</b> |

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

**3.6 Paving - 2024**

**Mitigated Construction 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     | 3.0900e-003        | 0.0293        | 0.0441        | 7.0000e-005        |               | 1.4100e-003        | 1.4100e-003        |                | 1.3000e-003        | 1.3000e-003        | 0.0000        | 5.8870        | 5.8870        | 1.8700e-003        | 0.0000        | 5.9337        |
| Paving       | 0.0000             |               |               |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| <b>Total</b> | <b>3.0900e-003</b> | <b>0.0293</b> | <b>0.0441</b> | <b>7.0000e-005</b> |               | <b>1.4100e-003</b> | <b>1.4100e-003</b> |                | <b>1.3000e-003</b> | <b>1.3000e-003</b> | <b>0.0000</b> | <b>5.8870</b> | <b>5.8870</b> | <b>1.8700e-003</b> | <b>0.0000</b> | <b>5.9337</b> |

**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       | 4.6000e-004        | 2.9000e-004        | 3.2600e-003        | 1.0000e-005        | 1.1100e-003        | 1.0000e-005        | 1.1200e-003        | 3.0000e-004        | 1.0000e-005        | 3.0000e-004        | 0.0000        | 0.8718        | 0.8718        | 2.0000e-005        | 2.0000e-005        | 0.8795        |
| <b>Total</b> | <b>4.6000e-004</b> | <b>2.9000e-004</b> | <b>3.2600e-003</b> | <b>1.0000e-005</b> | <b>1.1100e-003</b> | <b>1.0000e-005</b> | <b>1.1200e-003</b> | <b>3.0000e-004</b> | <b>1.0000e-005</b> | <b>3.0000e-004</b> | <b>0.0000</b> | <b>0.8718</b> | <b>0.8718</b> | <b>2.0000e-005</b> | <b>2.0000e-005</b> | <b>0.8795</b> |

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

**3.7 Architectural Coating - 2024**

**Unmitigated Construction 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 | 0.2468        |                    |                    |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road        | 9.0000e-004   | 6.0900e-003        | 9.0500e-003        | 1.0000e-005        |               | 3.0000e-004        | 3.0000e-004        |                | 3.0000e-004        | 3.0000e-004        | 0.0000        | 1.2766        | 1.2766        | 7.0000e-005        | 0.0000        | 1.2784        |
| <b>Total</b>    | <b>0.2477</b> | <b>6.0900e-003</b> | <b>9.0500e-003</b> | <b>1.0000e-005</b> |               | <b>3.0000e-004</b> | <b>3.0000e-004</b> |                | <b>3.0000e-004</b> | <b>3.0000e-004</b> | <b>0.0000</b> | <b>1.2766</b> | <b>1.2766</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>1.2784</b> |

**Unmitigated Construction Off-Site**

|              | ROG                | NOx                | CO                 | SO2           | Fugitive PM10      | Exhaust PM10  | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4           | N2O           | CO2e          |
|--------------|--------------------|--------------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Category     | tons/yr            |                    |                    |               |                    |               |                    |                    |               |                    | MT/yr         |               |               |               |               |               |
| Hauling      | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Worker       | 5.0000e-005        | 3.0000e-005        | 3.6000e-004        | 0.0000        | 1.2000e-004        | 0.0000        | 1.2000e-004        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 0.0969        | 0.0969        | 0.0000        | 0.0000        | 0.0977        |
| <b>Total</b> | <b>5.0000e-005</b> | <b>3.0000e-005</b> | <b>3.6000e-004</b> | <b>0.0000</b> | <b>1.2000e-004</b> | <b>0.0000</b> | <b>1.2000e-004</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>0.0969</b> | <b>0.0969</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0977</b> |



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

**3.7 Architectural Coating - 2024**

**Mitigated Construction 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 | 0.2468        |                    |                    |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road        | 9.0000e-004   | 6.0900e-003        | 9.0500e-003        | 1.0000e-005        |               | 3.0000e-004        | 3.0000e-004        |                | 3.0000e-004        | 3.0000e-004        | 0.0000        | 1.2766        | 1.2766        | 7.0000e-005        | 0.0000        | 1.2784        |
| <b>Total</b>    | <b>0.2477</b> | <b>6.0900e-003</b> | <b>9.0500e-003</b> | <b>1.0000e-005</b> |               | <b>3.0000e-004</b> | <b>3.0000e-004</b> |                | <b>3.0000e-004</b> | <b>3.0000e-004</b> | <b>0.0000</b> | <b>1.2766</b> | <b>1.2766</b> | <b>7.0000e-005</b> | <b>0.0000</b> | <b>1.2784</b> |

**Mitigated Construction Off-Site**

|              | ROG                | NOx                | CO                 | SO2           | Fugitive PM10      | Exhaust PM10  | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4           | N2O           | CO2e          |
|--------------|--------------------|--------------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|---------------|--------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Category     | tons/yr            |                    |                    |               |                    |               |                    |                    |               |                    | MT/yr         |               |               |               |               |               |
| Hauling      | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Vendor       | 0.0000             | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        |
| Worker       | 5.0000e-005        | 3.0000e-005        | 3.6000e-004        | 0.0000        | 1.2000e-004        | 0.0000        | 1.2000e-004        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 0.0969        | 0.0969        | 0.0000        | 0.0000        | 0.0977        |
| <b>Total</b> | <b>5.0000e-005</b> | <b>3.0000e-005</b> | <b>3.6000e-004</b> | <b>0.0000</b> | <b>1.2000e-004</b> | <b>0.0000</b> | <b>1.2000e-004</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>0.0969</b> | <b>0.0969</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0977</b> |

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

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

|             | ROG     | NOx    | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e    |
|-------------|---------|--------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|---------|
| Category    | tons/yr |        |        |             |               |              |            |                |               |             | MT/yr    |           |           |             |             |         |
| Mitigated   | 0.0398  | 0.0535 | 0.3839 | 7.6000e-004 | 0.0788        | 6.8000e-004  | 0.0795     | 0.0211         | 6.3000e-004   | 0.0217      | 0.0000   | 70.3276   | 70.3276   | 4.4700e-003 | 3.2900e-003 | 71.4193 |
| Unmitigated | 0.0398  | 0.0535 | 0.3839 | 7.6000e-004 | 0.0788        | 6.8000e-004  | 0.0795     | 0.0211         | 6.3000e-004   | 0.0217      | 0.0000   | 70.3276   | 70.3276   | 4.4700e-003 | 3.2900e-003 | 71.4193 |

4.2 Trip Summary Information

| Land Use                         | Average Daily Trip Rate |          |        | Unmitigated | Mitigated  |
|----------------------------------|-------------------------|----------|--------|-------------|------------|
|                                  | Weekday                 | Saturday | Sunday | Annual VMT  | Annual VMT |
| Condo/Townhouse                  | 14.64                   | 16.28    | 12.56  | 54,208      | 54,208     |
| Single Family Housing            | 18.88                   | 19.08    | 17.10  | 69,370      | 69,370     |
| Unrefrigerated Warehouse-No Rail | 22.97                   | 22.97    | 22.97  | 88,736      | 88,736     |
| Total                            | 56.49                   | 58.33    | 52.63  | 212,314     | 212,314    |

4.3 Trip Type Information

| Land Use                    | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|-----------------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                             | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| Condo/Townhouse             | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |
| Single Family Housing       | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |
| Unrefrigerated Warehouse-No | 14.70      | 6.60       | 6.60        | 59.00      | 0.00       | 41.00       | 92             | 5        | 3       |

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**4.4 Fleet Mix**

| Land Use                         | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|----------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Condo/Townhouse                  | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |
| Single Family Housing            | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |
| Unrefrigerated Warehouse-No Rail | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

|                         | ROG         | NOx         | CO          | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total  | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------------------|-------------|-------------|-------------|-------------|---------------|--------------|-------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category                | tons/yr     |             |             |             |               |              |             |                |               |             | MT/yr    |           |           |             |             |        |
| Electricity Mitigated   |             |             |             |             |               | 0.0000       | 0.0000      |                | 0.0000        | 0.0000      | 0.0000   | 4.5956    | 4.5956    | 3.9000e-004 | 5.0000e-005 | 4.6193 |
| Electricity Unmitigated |             |             |             |             |               | 0.0000       | 0.0000      |                | 0.0000        | 0.0000      | 0.0000   | 4.5956    | 4.5956    | 3.9000e-004 | 5.0000e-005 | 4.6193 |
| Natural Gas Mitigated   | 1.7000e-004 | 1.4800e-003 | 6.3000e-004 | 1.0000e-005 |               | 1.2000e-004  | 1.2000e-004 |                | 1.2000e-004   | 1.2000e-004 | 0.0000   | 1.7160    | 1.7160    | 3.0000e-005 | 3.0000e-005 | 1.7262 |
| Natural Gas Unmitigated | 1.7000e-004 | 1.4800e-003 | 6.3000e-004 | 1.0000e-005 |               | 1.2000e-004  | 1.2000e-004 |                | 1.2000e-004   | 1.2000e-004 | 0.0000   | 1.7160    | 1.7160    | 3.0000e-005 | 3.0000e-005 | 1.7262 |

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**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         |               |               |                    |                    |               |
| Condo/Townhouse                  | 9900.34        | 5.0000e-005        | 4.6000e-004        | 1.9000e-004        | 0.0000             |               | 4.0000e-005        | 4.0000e-005        |                | 4.0000e-005        | 4.0000e-005        | 0.0000        | 0.5283        | 0.5283        | 1.0000e-005        | 1.0000e-005        | 0.5315        |
| Single Family Housing            | 22255.7        | 1.2000e-004        | 1.0300e-003        | 4.4000e-004        | 1.0000e-005        |               | 8.0000e-005        | 8.0000e-005        |                | 8.0000e-005        | 8.0000e-005        | 0.0000        | 1.1877        | 1.1877        | 2.0000e-005        | 2.0000e-005        | 1.1947        |
| Unrefrigerated Warehouse-No Rail | 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        |
| <b>Total</b>                     |                | <b>1.7000e-004</b> | <b>1.4900e-003</b> | <b>6.3000e-004</b> | <b>1.0000e-005</b> |               | <b>1.2000e-004</b> | <b>1.2000e-004</b> |                | <b>1.2000e-004</b> | <b>1.2000e-004</b> | <b>0.0000</b> | <b>1.7160</b> | <b>1.7160</b> | <b>3.0000e-005</b> | <b>3.0000e-005</b> | <b>1.7262</b> |

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**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         |               |               |                    |                    |               |
| Condo/Townhouse                  | 9900.34        | 5.0000e-005        | 4.6000e-004        | 1.9000e-004        | 0.0000             |               | 4.0000e-005        | 4.0000e-005        |                | 4.0000e-005        | 4.0000e-005        | 0.0000        | 0.5283        | 0.5283        | 1.0000e-005        | 1.0000e-005        | 0.5315        |
| Single Family Housing            | 22255.7        | 1.2000e-004        | 1.0300e-003        | 4.4000e-004        | 1.0000e-005        |               | 8.0000e-005        | 8.0000e-005        |                | 8.0000e-005        | 8.0000e-005        | 0.0000        | 1.1877        | 1.1877        | 2.0000e-005        | 2.0000e-005        | 1.1947        |
| Unrefrigerated Warehouse-No Rail | 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        |
| <b>Total</b>                     |                | <b>1.7000e-004</b> | <b>1.4900e-003</b> | <b>6.3000e-004</b> | <b>1.0000e-005</b> |               | <b>1.2000e-004</b> | <b>1.2000e-004</b> |                | <b>1.2000e-004</b> | <b>1.2000e-004</b> | <b>0.0000</b> | <b>1.7160</b> | <b>1.7160</b> | <b>3.0000e-005</b> | <b>3.0000e-005</b> | <b>1.7262</b> |

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

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

|                                  | Electricity Use | Total CO2     | CH4                | N2O                | CO2e          |
|----------------------------------|-----------------|---------------|--------------------|--------------------|---------------|
| Land Use                         | kWh/yr          | MT/yr         |                    |                    |               |
| Condo/Townhouse                  | 10000.4         | 1.7735        | 1.5000e-004        | 2.0000e-005        | 1.7827        |
| Single Family Housing            | 15912.8         | 2.8221        | 2.4000e-004        | 3.0000e-005        | 2.8366        |
| Unrefrigerated Warehouse-No Rail | 0               | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| <b>Total</b>                     |                 | <b>4.5956</b> | <b>3.9000e-004</b> | <b>5.0000e-005</b> | <b>4.6193</b> |

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

**5.3 Energy by Land Use - Electricity**

**Mitigated**

|                                  | Electricity Use | Total CO2     | CH4                | N2O                | CO2e          |
|----------------------------------|-----------------|---------------|--------------------|--------------------|---------------|
| Land Use                         | kWh/yr          | MT/yr         |                    |                    |               |
| Condo/Townhouse                  | 10000.4         | 1.7735        | 1.5000e-004        | 2.0000e-005        | 1.7827        |
| Single Family Housing            | 15912.8         | 2.8221        | 2.4000e-004        | 3.0000e-005        | 2.8366        |
| Unrefrigerated Warehouse-No Rail | 0               | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| <b>Total</b>                     |                 | <b>4.5956</b> | <b>3.9000e-004</b> | <b>5.0000e-005</b> | <b>4.6193</b> |

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

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

|             | ROG     | NOx         | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------|---------|-------------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category    | tons/yr |             |        |             |               |              |            |                |               |             | MT/yr    |           |           |             |             |        |
| Mitigated   | 0.3516  | 5.2400e-003 | 0.3396 | 5.6000e-004 |               | 0.0436       | 0.0436     |                | 0.0436        | 0.0436      | 4.1318   | 1.7816    | 5.9134    | 3.8600e-003 | 3.2000e-004 | 6.1068 |
| Unmitigated | 0.3516  | 5.2400e-003 | 0.3396 | 5.6000e-004 |               | 0.0436       | 0.0436     |                | 0.0436        | 0.0436      | 4.1318   | 1.7816    | 5.9134    | 3.8600e-003 | 3.2000e-004 | 6.1068 |

**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 | 0.0247        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 0.0750        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.2510        | 4.9000e-003        | 0.3098        | 5.6000e-004        |               | 0.0434        | 0.0434        |                | 0.0434        | 0.0434        | 4.1318        | 1.7328        | 5.8647        | 3.8100e-003        | 3.2000e-004        | 6.0568        |
| Landscaping           | 9.0000e-004   | 3.4000e-004        | 0.0298        | 0.0000             |               | 1.7000e-004   | 1.7000e-004   |                | 1.7000e-004   | 1.7000e-004   | 0.0000        | 0.0488        | 0.0488        | 5.0000e-005        | 0.0000             | 0.0499        |
| <b>Total</b>          | <b>0.3516</b> | <b>5.2400e-003</b> | <b>0.3396</b> | <b>5.6000e-004</b> |               | <b>0.0436</b> | <b>0.0436</b> |                | <b>0.0436</b> | <b>0.0436</b> | <b>4.1318</b> | <b>1.7816</b> | <b>5.9134</b> | <b>3.8600e-003</b> | <b>3.2000e-004</b> | <b>6.1068</b> |



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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O                | CO2e          |
|-----------------------|---------------|--------------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|--------------------|--------------------|---------------|
| SubCategory           | tons/yr       |                    |               |                    |               |               |               |                |               |               | MT/yr         |               |               |                    |                    |               |
| Architectural Coating | 0.0247        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 0.0750        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.2510        | 4.9000e-003        | 0.3098        | 5.6000e-004        |               | 0.0434        | 0.0434        |                | 0.0434        | 0.0434        | 4.1318        | 1.7328        | 5.8647        | 3.8100e-003        | 3.2000e-004        | 6.0568        |
| Landscaping           | 9.0000e-004   | 3.4000e-004        | 0.0298        | 0.0000             |               | 1.7000e-004   | 1.7000e-004   |                | 1.7000e-004   | 1.7000e-004   | 0.0000        | 0.0488        | 0.0488        | 5.0000e-005        | 0.0000             | 0.0499        |
| <b>Total</b>          | <b>0.3516</b> | <b>5.2400e-003</b> | <b>0.3396</b> | <b>5.6000e-004</b> |               | <b>0.0436</b> | <b>0.0436</b> |                | <b>0.0436</b> | <b>0.0436</b> | <b>4.1318</b> | <b>1.7816</b> | <b>5.9134</b> | <b>3.8600e-003</b> | <b>3.2000e-004</b> | <b>6.1068</b> |

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

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

|             | Total CO2 | CH4    | N2O         | CO2e   |
|-------------|-----------|--------|-------------|--------|
| Category    | MT/yr     |        |             |        |
| Mitigated   | 4.3385    | 0.1082 | 2.5800e-003 | 7.8141 |
| Unmitigated | 4.3385    | 0.1082 | 2.5800e-003 | 7.8141 |

**7.2 Water by Land Use**

**Unmitigated**

|                                  | Indoor/Outdoor Use   | Total CO2     | CH4           | N2O                | CO2e          |
|----------------------------------|----------------------|---------------|---------------|--------------------|---------------|
| Land Use                         | Mgal                 | MT/yr         |               |                    |               |
| Condo/Townhouse                  | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| Single Family Housing            | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| Unrefrigerated Warehouse-No Rail | 3.0525 / 0.00987427  | 3.9038        | 0.0997        | 2.3800e-003        | 7.1055        |
| <b>Total</b>                     |                      | <b>4.3385</b> | <b>0.1082</b> | <b>2.5800e-003</b> | <b>7.8141</b> |

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

**7.2 Water by Land Use**

**Mitigated**

|                                  | Indoor/Outdoor Use   | Total CO2     | CH4           | N2O                | CO2e          |
|----------------------------------|----------------------|---------------|---------------|--------------------|---------------|
| Land Use                         | Mgal                 | MT/yr         |               |                    |               |
| Condo/Townhouse                  | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| Single Family Housing            | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| Unrefrigerated Warehouse-No Rail | 3.0525 / 0.00987427  | 3.9038        | 0.0997        | 2.3800e-003        | 7.1055        |
| <b>Total</b>                     |                      | <b>4.3385</b> | <b>0.1082</b> | <b>2.5800e-003</b> | <b>7.8141</b> |

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

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

**Category/Year**

|             | Total CO2 | CH4    | N2O    | CO2e   |
|-------------|-----------|--------|--------|--------|
|             | MT/yr     |        |        |        |
| Mitigated   | 3.0104    | 0.1779 | 0.0000 | 7.4580 |
| Unmitigated | 3.0104    | 0.1779 | 0.0000 | 7.4580 |

**8.2 Waste by Land Use**

**Unmitigated**

|                                  | Waste Disposed | Total CO2     | CH4           | N2O           | CO2e          |
|----------------------------------|----------------|---------------|---------------|---------------|---------------|
| Land Use                         | tons           | MT/yr         |               |               |               |
| Condo/Townhouse                  | 0.92           | 0.1868        | 0.0110        | 0.0000        | 0.4627        |
| Single Family Housing            | 1.5            | 0.3045        | 0.0180        | 0.0000        | 0.7544        |
| Unrefrigerated Warehouse-No Rail | 12.41          | 2.5191        | 0.1489        | 0.0000        | 6.2410        |
| <b>Total</b>                     |                | <b>3.0104</b> | <b>0.1779</b> | <b>0.0000</b> | <b>7.4580</b> |

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

**8.2 Waste by Land Use**

**Mitigated**

|                                  | Waste Disposed | Total CO2     | CH4           | N2O           | CO2e          |
|----------------------------------|----------------|---------------|---------------|---------------|---------------|
| Land Use                         | tons           | MT/yr         |               |               |               |
| Condo/Townhouse                  | 0.92           | 0.1868        | 0.0110        | 0.0000        | 0.4627        |
| Single Family Housing            | 1.5            | 0.3045        | 0.0180        | 0.0000        | 0.7544        |
| Unrefrigerated Warehouse-No Rail | 12.41          | 2.5191        | 0.1489        | 0.0000        | 6.2410        |
| <b>Total</b>                     |                | <b>3.0104</b> | <b>0.1779</b> | <b>0.0000</b> | <b>7.4580</b> |

**9.0 Operational Offroad**

| Equipment Type            | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---------------------------|--------|-----------|-----------|-------------|-------------|-----------|
| Forklifts                 | 1      | 4.00      | 260       | 89          | 0.20        | Diesel    |
| Off-Highway Trucks        | 1      | 2.00      | 260       | 402         | 0.38        | Diesel    |
| Tractors/Loaders/Backhoes | 1      | 4.00      | 260       | 97          | 0.37        | Diesel    |

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

**UnMitigated/Mitigated**

|                           | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total         | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2      | Total CO2      | CH4           | N2O           | CO2e           |
|---------------------------|---------------|---------------|---------------|--------------------|---------------|--------------------|--------------------|----------------|--------------------|--------------------|---------------|----------------|----------------|---------------|---------------|----------------|
| Equipment Type            | tons/yr       |               |               |                    |               |                    |                    |                |                    |                    | MT/yr         |                |                |               |               |                |
| Forklifts                 | 5.6800e-003   | 0.0535        | 0.0741        | 1.0000e-004        |               | 2.8600e-003        | 2.8600e-003        |                | 2.6300e-003        | 2.6300e-003        | 0.0000        | 8.7726         | 8.7726         | 2.8400e-003   | 0.0000        | 8.8435         |
| Off-Highway Trucks        | 0.0156        | 0.0936        | 0.1041        | 4.3000e-004        |               | 3.3500e-003        | 3.3500e-003        |                | 3.0800e-003        | 3.0800e-003        | 0.0000        | 37.9179        | 37.9179        | 0.0123        | 0.0000        | 38.2245        |
| Tractors/Loaders/Backhoes | 8.5500e-003   | 0.0864        | 0.1443        | 2.0000e-004        |               | 3.5000e-003        | 3.5000e-003        |                | 3.2200e-003        | 3.2200e-003        | 0.0000        | 17.7391        | 17.7391        | 5.7400e-003   | 0.0000        | 17.8825        |
| <b>Total</b>              | <b>0.0298</b> | <b>0.2335</b> | <b>0.3225</b> | <b>7.3000e-004</b> |               | <b>9.7100e-003</b> | <b>9.7100e-003</b> |                | <b>8.9300e-003</b> | <b>8.9300e-003</b> | <b>0.0000</b> | <b>64.4296</b> | <b>64.4296</b> | <b>0.0208</b> | <b>0.0000</b> | <b>64.9505</b> |

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

| Equipment Type      | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|------------|-------------|-------------|-----------|
| Emergency Generator | 1      | 0         | 50         | 202         | 0.73        | CNG       |

**Boilers**

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

Apogee-Field Crops - Great Basin UAPCD Air District, Annual

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

**10.1 Stationary Sources**

**Unmitigated/Mitigated**

|  | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total         | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|--|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|----------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Equipment Type                         | tons/yr       |                    |               |                    |               |                    |                    |                |                    |                    | MT/yr         |               |               |                    |               |               |
| Emergency Generator - CNG (0 - 500 HP) | 0.0444        | 4.2800e-003        | 0.1157        | 2.0000e-005        |               | 2.5000e-004        | 2.5000e-004        |                | 2.5000e-004        | 2.5000e-004        | 0.0000        | 2.5752        | 2.5752        | 5.3800e-003        | 0.0000        | 2.7098        |
| <b>Total</b>                           | <b>0.0444</b> | <b>4.2800e-003</b> | <b>0.1157</b> | <b>2.0000e-005</b> |               | <b>2.5000e-004</b> | <b>2.5000e-004</b> |                | <b>2.5000e-004</b> | <b>2.5000e-004</b> | <b>0.0000</b> | <b>2.5752</b> | <b>2.5752</b> | <b>5.3800e-003</b> | <b>0.0000</b> | <b>2.7098</b> |

**11.0 Vegetation**

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Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**Apogee-Field Crops  
Great Basin UAPCD Air District, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

| Land Uses                        | Size  | Metric        | Lot Acreage | Floor Surface Area | Population |
|----------------------------------|-------|---------------|-------------|--------------------|------------|
| Unrefrigerated Warehouse-No Rail | 13.20 | 1000sqft      | 0.30        | 13,200.00          | 0          |
| Single Family Housing            | 2.00  | Dwelling Unit | 0.65        | 4,000.00           | 6          |
| Condo/Townhouse                  | 2.00  | Dwelling Unit | 0.13        | 2,000.00           | 6          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          | <b>Operational Year</b>        | 2025  |                                  |       |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

Project Characteristics -

Land Use - Single Family Housing - Single Family Dwelling Units; Condo - Accessory Dwelling Units; Warehouse - Farm Shop

Demolition -

Trips and VMT - Building construction materials hauling trip - 1 trip per 150 square feet of construction.

Water And Wastewater - Warehouse = water use for highwater demand crops.

Operational Off-Road Equipment - Off-road equipment = typical equipment needed for farm activities.

Stationary Sources - Emergency Generators and Fire Pumps - 50 hours/year is required for back-up generator maintenance.

Construction Off-road Equipment Mitigation -



Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

| Table Name                      | Column Name                | Default Value | New Value |
|---------------------------------|----------------------------|---------------|-----------|
| tblLandUse                      | LandUseSquareFeet          | 3,600.00      | 4,000.00  |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 4.00      |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 2.00      |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 4.00      |
| tblOperationalOffRoadEquipment  | OperLoadFactor             | 0.20          | 0.20      |
| tblOperationalOffRoadEquipment  | OperLoadFactor             | 0.38          | 0.38      |
| tblOperationalOffRoadEquipment  | OperLoadFactor             | 0.37          | 0.37      |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00      |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00      |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00      |
| tblProjectCharacteristics       | UrbanizationLevel          | Urban         | Rural     |
| tblStationaryGeneratorsPumpsUse | HorsePowerValue            | 0.00          | 202.00    |
| tblStationaryGeneratorsPumpsUse | HoursPerYear               | 0.00          | 50.00     |
| tblStationaryGeneratorsPumpsUse | NumberOfEquipment          | 0.00          | 1.00      |
| tblTripsAndVMT                  | HaulingTripNumber          | 2.00          | 49.00     |
| tblTripsAndVMT                  | HaulingTripNumber          | 0.00          | 128.00    |
| tblTripsAndVMT                  | WorkerTripNumber           | 13.00         | 10.00     |
| tblTripsAndVMT                  | WorkerTripNumber           | 8.00          | 5.00      |
| tblTripsAndVMT                  | WorkerTripNumber           | 10.00         | 8.00      |
| tblTripsAndVMT                  | WorkerTripNumber           | 13.00         | 18.00     |
| tblWater                        | OutdoorWaterUseRate        | 0.00          | 9,874.27  |

**2.0 Emissions Summary**

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Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**2.2 Overall Operational**

**Unmitigated Operational**

|              | ROG           | NOx           | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2        | NBio- CO2         | Total CO2         | CH4           | N2O           | CO2e              |
|--------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|-----------------|-------------------|-------------------|---------------|---------------|-------------------|
| Category     | lb/day        |               |                |               |               |               |               |                |               |               | lb/day          |                   |                   |               |               |                   |
| Area         | 6.6777        | 0.1234        | 7.8875         | 0.0137        |               | 1.0613        | 1.0613        |                | 1.0613        | 1.0613        | 111.0869        | 47.1853           | 158.2723          | 0.1031        | 8.7400e-003   | 163.4534          |
| Energy       | 9.5000e-004   | 8.1200e-003   | 3.4500e-003    | 5.0000e-005   |               | 6.6000e-004   | 6.6000e-004   |                | 6.6000e-004   | 6.6000e-004   |                 | 10.3646           | 10.3646           | 2.0000e-004   | 1.9000e-004   | 10.4262           |
| Mobile       | 0.2369        | 0.2776        | 2.0873         | 4.4900e-003   | 0.4638        | 3.8600e-003   | 0.4677        | 0.1236         | 3.6100e-003   | 0.1272        |                 | 455.8888          | 455.8888          | 0.0261        | 0.0194        | 462.3171          |
| Offroad      | 0.2295        | 1.7963        | 2.4804         | 5.6400e-003   |               | 0.0747        | 0.0747        |                | 0.0687        | 0.0687        | 0.0000          | 546.3196          | 546.3196          | 0.1767        |               | 550.7369          |
| Stationary   | 0.0000        | 0.0000        | 0.0000         | 0.0000        |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 | 0.0000            | 0.0000            | 0.0000        |               | 0.0000            |
| <b>Total</b> | <b>7.1450</b> | <b>2.2054</b> | <b>12.4586</b> | <b>0.0239</b> | <b>0.4638</b> | <b>1.1405</b> | <b>1.6044</b> | <b>0.1236</b>  | <b>1.1343</b> | <b>1.2579</b> | <b>111.0869</b> | <b>1,059.7583</b> | <b>1,170.8452</b> | <b>0.3061</b> | <b>0.0283</b> | <b>1,186.9335</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2        | NBio- CO2         | Total CO2         | CH4           | N2O           | CO2e              |
|--------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|-----------------|-------------------|-------------------|---------------|---------------|-------------------|
| Category     | lb/day        |               |                |               |               |               |               |                |               |               | lb/day          |                   |                   |               |               |                   |
| Area         | 6.6777        | 0.1234        | 7.8875         | 0.0137        |               | 1.0613        | 1.0613        |                | 1.0613        | 1.0613        | 111.0869        | 47.1853           | 158.2723          | 0.1031        | 8.7400e-003   | 163.4534          |
| Energy       | 9.5000e-004   | 8.1200e-003   | 3.4500e-003    | 5.0000e-005   |               | 6.6000e-004   | 6.6000e-004   |                | 6.6000e-004   | 6.6000e-004   |                 | 10.3646           | 10.3646           | 2.0000e-004   | 1.9000e-004   | 10.4262           |
| Mobile       | 0.2369        | 0.2776        | 2.0873         | 4.4900e-003   | 0.4638        | 3.8600e-003   | 0.4677        | 0.1236         | 3.6100e-003   | 0.1272        |                 | 455.8888          | 455.8888          | 0.0261        | 0.0194        | 462.3171          |
| Offroad      | 0.2295        | 1.7963        | 2.4804         | 5.6400e-003   |               | 0.0747        | 0.0747        |                | 0.0687        | 0.0687        | 0.0000          | 546.3196          | 546.3196          | 0.1767        |               | 550.7369          |
| Stationary   | 0.0000        | 0.0000        | 0.0000         | 0.0000        |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 | 0.0000            | 0.0000            | 0.0000        |               | 0.0000            |
| <b>Total</b> | <b>7.1450</b> | <b>2.2054</b> | <b>12.4586</b> | <b>0.0239</b> | <b>0.4638</b> | <b>1.1405</b> | <b>1.6044</b> | <b>0.1236</b>  | <b>1.1343</b> | <b>1.2579</b> | <b>111.0869</b> | <b>1,059.7583</b> | <b>1,170.8452</b> | <b>0.3061</b> | <b>0.0283</b> | <b>1,186.9335</b> |

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

**3.0 Construction Detail**

**Construction Phase**

| Phase Number | Phase Name       | Phase Type       | Start Date | End Date  | Num Days Week | Num Days | Phase Description |
|--------------|------------------|------------------|------------|-----------|---------------|----------|-------------------|
| 1            | Demolition       | Demolition       | 1/2/2024   | 1/29/2024 | 5             | 20       |                   |
| 2            | Site Preparation | Site Preparation | 1/30/2024  | 1/31/2024 | 5             | 2        |                   |
| 3            | Grading          | Grading          | 2/1/2024   | 2/6/2024  | 5             | 4        |                   |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

|   |                       |                       |            |            |   |     |
|---|-----------------------|-----------------------|------------|------------|---|-----|
| 4 | Building Construction | Building Construction | 2/7/2024   | 11/12/2024 | 5 | 200 |
| 5 | Paving                | Paving                | 11/13/2024 | 11/26/2024 | 5 | 10  |
| 6 | Architectural Coating | Architectural Coating | 11/27/2024 | 12/10/2024 | 5 | 10  |

**Acres of Grading (Site Preparation Phase): 1.88**

**Acres of Grading (Grading Phase): 4**

**Acres of Paving: 0**

**Residential Indoor: 12,150; Residential Outdoor: 4,050; Non-Residential Indoor: 19,800; Non-Residential Outdoor: 6,600; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name            | Offroad Equipment Type    | Amount | Usage Hours | Horse Power | Load Factor |
|-----------------------|---------------------------|--------|-------------|-------------|-------------|
| Architectural Coating | Air Compressors           | 1      | 6.00        | 78          | 0.48        |
| Paving                | Cement and Mortar Mixers  | 1      | 6.00        | 9           | 0.56        |
| Demolition            | Concrete/Industrial Saws  | 1      | 8.00        | 81          | 0.73        |
| Building Construction | Cranes                    | 1      | 6.00        | 231         | 0.29        |
| Building Construction | Forklifts                 | 1      | 6.00        | 89          | 0.20        |
| Building Construction | Generator Sets            | 1      | 8.00        | 84          | 0.74        |
| Grading               | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Site Preparation      | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Paving                | Pavers                    | 1      | 6.00        | 130         | 0.42        |
| Paving                | Paving Equipment          | 1      | 8.00        | 132         | 0.36        |
| Paving                | Rollers                   | 1      | 7.00        | 80          | 0.38        |
| Demolition            | Rubber Tired Dozers       | 1      | 8.00        | 247         | 0.40        |
| Grading               | Rubber Tired Dozers       | 1      | 8.00        | 247         | 0.40        |
| Site Preparation      | Rubber Tired Dozers       | 1      | 7.00        | 247         | 0.40        |
| Building Construction | Tractors/Loaders/Backhoes | 1      | 6.00        | 97          | 0.37        |
| Demolition            | Tractors/Loaders/Backhoes | 3      | 8.00        | 97          | 0.37        |
| Grading               | Tractors/Loaders/Backhoes | 2      | 7.00        | 97          | 0.37        |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

|                       |                           |   |      |    |      |
|-----------------------|---------------------------|---|------|----|------|
| Paving                | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |
| Site Preparation      | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |
| Building Construction | Welders                   | 3 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            | 5                       | 10.00              | 0.00               | 49.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Site Preparation      | 3                       | 5.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Grading               | 4                       | 8.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Building Construction | 7                       | 8.00               | 3.00               | 128.00              | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Paving                | 5                       | 18.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Architectural Coating | 1                       | 2.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |

**3.1 Mitigation Measures Construction**

Water Exposed Area

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.2 Demolition - 2024**

**Unmitigated Construction On-Site**

|               | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |                |               |               |               |               |                    |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |                |                |               | 0.0254        | 0.0000        | 0.0254        | 3.8400e-003        | 0.0000        | 3.8400e-003   |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.4397        | 13.8867        | 13.4879        | 0.0241        |               | 0.6311        | 0.6311        |                    | 0.5895        | 0.5895        |          | 2,324.9459        | 2,324.9459        | 0.5884        |     | 2,339.6562        |
| <b>Total</b>  | <b>1.4397</b> | <b>13.8867</b> | <b>13.4879</b> | <b>0.0241</b> | <b>0.0254</b> | <b>0.6311</b> | <b>0.6565</b> | <b>3.8400e-003</b> | <b>0.5895</b> | <b>0.5933</b> |          | <b>2,324.9459</b> | <b>2,324.9459</b> | <b>0.5884</b> |     | <b>2,339.6562</b> |

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 6.9200e-003   | 0.3187        | 0.0802        | 1.4000e-003        | 0.0430        | 3.2500e-003        | 0.0462        | 0.0118         | 3.1100e-003        | 0.0149        |          | 148.1452        | 148.1452        | 3.2000e-004        | 0.0233        | 155.0908        |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000        | 0.0000          |
| Worker       | 0.0510        | 0.0271        | 0.3729        | 1.1000e-003        | 0.1277        | 6.6000e-004        | 0.1284        | 0.0339         | 6.0000e-004        | 0.0345        |          | 111.2143        | 111.2143        | 2.6600e-003        | 2.6700e-003   | 112.0753        |
| <b>Total</b> | <b>0.0579</b> | <b>0.3458</b> | <b>0.4531</b> | <b>2.5000e-003</b> | <b>0.1707</b> | <b>3.9100e-003</b> | <b>0.1746</b> | <b>0.0457</b>  | <b>3.7100e-003</b> | <b>0.0494</b> |          | <b>259.3595</b> | <b>259.3595</b> | <b>2.9800e-003</b> | <b>0.0260</b> | <b>267.1662</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.2 Demolition - 2024**

**Mitigated Construction On-Site**

|               | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |                |               |               |               |               |                    |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |                |                |               | 0.0114        | 0.0000        | 0.0114        | 1.7300e-003        | 0.0000        | 1.7300e-003   |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.4397        | 13.8867        | 13.4879        | 0.0241        |               | 0.6311        | 0.6311        |                    | 0.5895        | 0.5895        | 0.0000        | 2,324.9459        | 2,324.9459        | 0.5884        |     | 2,339.6562        |
| <b>Total</b>  | <b>1.4397</b> | <b>13.8867</b> | <b>13.4879</b> | <b>0.0241</b> | <b>0.0114</b> | <b>0.6311</b> | <b>0.6425</b> | <b>1.7300e-003</b> | <b>0.5895</b> | <b>0.5912</b> | <b>0.0000</b> | <b>2,324.9459</b> | <b>2,324.9459</b> | <b>0.5884</b> |     | <b>2,339.6562</b> |

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 6.9200e-003   | 0.3187        | 0.0802        | 1.4000e-003        | 0.0430        | 3.2500e-003        | 0.0462        | 0.0118         | 3.1100e-003        | 0.0149        |          | 148.1452        | 148.1452        | 3.2000e-004        | 0.0233        | 155.0908        |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000        | 0.0000          |
| Worker       | 0.0510        | 0.0271        | 0.3729        | 1.1000e-003        | 0.1277        | 6.6000e-004        | 0.1284        | 0.0339         | 6.0000e-004        | 0.0345        |          | 111.2143        | 111.2143        | 2.6600e-003        | 2.6700e-003   | 112.0753        |
| <b>Total</b> | <b>0.0579</b> | <b>0.3458</b> | <b>0.4531</b> | <b>2.5000e-003</b> | <b>0.1707</b> | <b>3.9100e-003</b> | <b>0.1746</b> | <b>0.0457</b>  | <b>3.7100e-003</b> | <b>0.0494</b> |          | <b>259.3595</b> | <b>259.3595</b> | <b>2.9800e-003</b> | <b>0.0260</b> | <b>267.1662</b> |



Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.3 Site Preparation - 2024**

**Unmitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 6.2662        | 0.0000        | 6.2662        | 3.0041         | 0.0000        | 3.0041        |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.1067        | 11.8407        | 6.6317        | 0.0172        |               | 0.4823        | 0.4823        |                | 0.4437        | 0.4437        |          | 1,665.8826        | 1,665.8826        | 0.5388        |     | 1,679.3521        |
| <b>Total</b>  | <b>1.1067</b> | <b>11.8407</b> | <b>6.6317</b> | <b>0.0172</b> | <b>6.2662</b> | <b>0.4823</b> | <b>6.7485</b> | <b>3.0041</b>  | <b>0.4437</b> | <b>3.4478</b> |          | <b>1,665.8826</b> | <b>1,665.8826</b> | <b>0.5388</b> |     | <b>1,679.3521</b> |

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0255        | 0.0136        | 0.1864        | 5.5000e-004        | 0.0639        | 3.3000e-004        | 0.0642        | 0.0169         | 3.0000e-004        | 0.0172        |          | 55.6072        | 55.6072        | 1.3300e-003        | 1.3300e-003        | 56.0377        |
| <b>Total</b> | <b>0.0255</b> | <b>0.0136</b> | <b>0.1864</b> | <b>5.5000e-004</b> | <b>0.0639</b> | <b>3.3000e-004</b> | <b>0.0642</b> | <b>0.0169</b>  | <b>3.0000e-004</b> | <b>0.0172</b> |          | <b>55.6072</b> | <b>55.6072</b> | <b>1.3300e-003</b> | <b>1.3300e-003</b> | <b>56.0377</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.3 Site Preparation - 2024**

**Mitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 2.8198        | 0.0000        | 2.8198        | 1.3518         | 0.0000        | 1.3518        |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.1067        | 11.8407        | 6.6317        | 0.0172        |               | 0.4823        | 0.4823        |                | 0.4437        | 0.4437        | 0.0000        | 1,665.8826        | 1,665.8826        | 0.5388        |     | 1,679.3521        |
| <b>Total</b>  | <b>1.1067</b> | <b>11.8407</b> | <b>6.6317</b> | <b>0.0172</b> | <b>2.8198</b> | <b>0.4823</b> | <b>3.3020</b> | <b>1.3518</b>  | <b>0.4437</b> | <b>1.7955</b> | <b>0.0000</b> | <b>1,665.8826</b> | <b>1,665.8826</b> | <b>0.5388</b> |     | <b>1,679.3521</b> |

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0255        | 0.0136        | 0.1864        | 5.5000e-004        | 0.0639        | 3.3000e-004        | 0.0642        | 0.0169         | 3.0000e-004        | 0.0172        |          | 55.6072        | 55.6072        | 1.3300e-003        | 1.3300e-003        | 56.0377        |
| <b>Total</b> | <b>0.0255</b> | <b>0.0136</b> | <b>0.1864</b> | <b>5.5000e-004</b> | <b>0.0639</b> | <b>3.3000e-004</b> | <b>0.0642</b> | <b>0.0169</b>  | <b>3.0000e-004</b> | <b>0.0172</b> |          | <b>55.6072</b> | <b>55.6072</b> | <b>1.3300e-003</b> | <b>1.3300e-003</b> | <b>56.0377</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.4 Grading - 2024**

**Unmitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 7.0826        | 0.0000        | 7.0826        | 3.4247         | 0.0000        | 3.4247        |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.3015        | 13.8178        | 8.6998        | 0.0206        |               | 0.5722        | 0.5722        |                | 0.5265        | 0.5265        |          | 1,995.5803        | 1,995.5803        | 0.6454        |     | 2,011.7155        |
| <b>Total</b>  | <b>1.3015</b> | <b>13.8178</b> | <b>8.6998</b> | <b>0.0206</b> | <b>7.0826</b> | <b>0.5722</b> | <b>7.6548</b> | <b>3.4247</b>  | <b>0.5265</b> | <b>3.9512</b> |          | <b>1,995.5803</b> | <b>1,995.5803</b> | <b>0.6454</b> |     | <b>2,011.7155</b> |

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0408        | 0.0217        | 0.2983        | 8.8000e-004        | 0.1022        | 5.2000e-004        | 0.1027        | 0.0271         | 4.8000e-004        | 0.0276        |          | 88.9715        | 88.9715        | 2.1300e-003        | 2.1300e-003        | 89.6603        |
| <b>Total</b> | <b>0.0408</b> | <b>0.0217</b> | <b>0.2983</b> | <b>8.8000e-004</b> | <b>0.1022</b> | <b>5.2000e-004</b> | <b>0.1027</b> | <b>0.0271</b>  | <b>4.8000e-004</b> | <b>0.0276</b> |          | <b>88.9715</b> | <b>88.9715</b> | <b>2.1300e-003</b> | <b>2.1300e-003</b> | <b>89.6603</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.4 Grading - 2024**

**Mitigated Construction On-Site**

|               | ROG           | NOx            | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |                |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |                |               |               | 3.1872        | 0.0000        | 3.1872        | 1.5411         | 0.0000        | 1.5411        |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 1.3015        | 13.8178        | 8.6998        | 0.0206        |               | 0.5722        | 0.5722        |                | 0.5265        | 0.5265        | 0.0000        | 1,995.5803        | 1,995.5803        | 0.6454        |     | 2,011.7155        |
| <b>Total</b>  | <b>1.3015</b> | <b>13.8178</b> | <b>8.6998</b> | <b>0.0206</b> | <b>3.1872</b> | <b>0.5722</b> | <b>3.7594</b> | <b>1.5411</b>  | <b>0.5265</b> | <b>2.0676</b> | <b>0.0000</b> | <b>1,995.5803</b> | <b>1,995.5803</b> | <b>0.6454</b> |     | <b>2,011.7155</b> |

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0408        | 0.0217        | 0.2983        | 8.8000e-004        | 0.1022        | 5.2000e-004        | 0.1027        | 0.0271         | 4.8000e-004        | 0.0276        |          | 88.9715        | 88.9715        | 2.1300e-003        | 2.1300e-003        | 89.6603        |
| <b>Total</b> | <b>0.0408</b> | <b>0.0217</b> | <b>0.2983</b> | <b>8.8000e-004</b> | <b>0.1022</b> | <b>5.2000e-004</b> | <b>0.1027</b> | <b>0.0271</b>  | <b>4.8000e-004</b> | <b>0.0276</b> |          | <b>88.9715</b> | <b>88.9715</b> | <b>2.1300e-003</b> | <b>2.1300e-003</b> | <b>89.6603</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.5 Building Construction - 2024**

**Unmitigated Construction On-Site**

|              | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |                |                |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Off-Road     | 1.4200        | 11.0639        | 12.5172        | 0.0221        |               | 0.4506        | 0.4506        |                | 0.4348        | 0.4348        |          | 2,001.9214        | 2,001.9214        | 0.3334        |     | 2,010.2563        |
| <b>Total</b> | <b>1.4200</b> | <b>11.0639</b> | <b>12.5172</b> | <b>0.0221</b> |               | <b>0.4506</b> | <b>0.4506</b> |                | <b>0.4348</b> | <b>0.4348</b> |          | <b>2,001.9214</b> | <b>2,001.9214</b> | <b>0.3334</b> |     | <b>2,010.2563</b> |

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 1.8100e-003   | 0.0833        | 0.0210        | 3.7000e-004        | 0.0112        | 8.5000e-004        | 0.0121        | 3.0800e-003    | 8.1000e-004        | 3.8900e-003   |          | 38.6991         | 38.6991         | 8.0000e-005        | 6.0800e-003   | 40.5135         |
| Vendor       | 7.0000e-003   | 0.1271        | 0.0616        | 5.9000e-004        | 0.0184        | 8.8000e-004        | 0.0193        | 5.3000e-003    | 8.4000e-004        | 6.1400e-003   |          | 61.4544         | 61.4544         | 3.4000e-004        | 7.9200e-003   | 63.8242         |
| Worker       | 0.0408        | 0.0217        | 0.2983        | 8.8000e-004        | 0.1022        | 5.2000e-004        | 0.1027        | 0.0271         | 4.8000e-004        | 0.0276        |          | 88.9715         | 88.9715         | 2.1300e-003        | 2.1300e-003   | 89.6603         |
| <b>Total</b> | <b>0.0496</b> | <b>0.2320</b> | <b>0.3808</b> | <b>1.8400e-003</b> | <b>0.1318</b> | <b>2.2500e-003</b> | <b>0.1341</b> | <b>0.0355</b>  | <b>2.1300e-003</b> | <b>0.0376</b> |          | <b>189.1250</b> | <b>189.1250</b> | <b>2.5500e-003</b> | <b>0.0161</b> | <b>193.9980</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.5 Building Construction - 2024**

**Mitigated Construction On-Site**

|              | ROG           | NOx            | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|----------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |                |                |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Off-Road     | 1.4200        | 11.0639        | 12.5172        | 0.0221        |               | 0.4506        | 0.4506        |                | 0.4348        | 0.4348        | 0.0000        | 2,001.9214        | 2,001.9214        | 0.3334        |     | 2,010.2563        |
| <b>Total</b> | <b>1.4200</b> | <b>11.0639</b> | <b>12.5172</b> | <b>0.0221</b> |               | <b>0.4506</b> | <b>0.4506</b> |                | <b>0.4348</b> | <b>0.4348</b> | <b>0.0000</b> | <b>2,001.9214</b> | <b>2,001.9214</b> | <b>0.3334</b> |     | <b>2,010.2563</b> |

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 1.8100e-003   | 0.0833        | 0.0210        | 3.7000e-004        | 0.0112        | 8.5000e-004        | 0.0121        | 3.0800e-003    | 8.1000e-004        | 3.8900e-003   |          | 38.6991         | 38.6991         | 8.0000e-005        | 6.0800e-003   | 40.5135         |
| Vendor       | 7.0000e-003   | 0.1271        | 0.0616        | 5.9000e-004        | 0.0184        | 8.8000e-004        | 0.0193        | 5.3000e-003    | 8.4000e-004        | 6.1400e-003   |          | 61.4544         | 61.4544         | 3.4000e-004        | 7.9200e-003   | 63.8242         |
| Worker       | 0.0408        | 0.0217        | 0.2983        | 8.8000e-004        | 0.1022        | 5.2000e-004        | 0.1027        | 0.0271         | 4.8000e-004        | 0.0276        |          | 88.9715         | 88.9715         | 2.1300e-003        | 2.1300e-003   | 89.6603         |
| <b>Total</b> | <b>0.0496</b> | <b>0.2320</b> | <b>0.3808</b> | <b>1.8400e-003</b> | <b>0.1318</b> | <b>2.2500e-003</b> | <b>0.1341</b> | <b>0.0355</b>  | <b>2.1300e-003</b> | <b>0.0376</b> |          | <b>189.1250</b> | <b>189.1250</b> | <b>2.5500e-003</b> | <b>0.0161</b> | <b>193.9980</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.6 Paving - 2024**

**Unmitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Off-Road     | 0.6180        | 5.8607        | 8.8253        | 0.0136        |               | 0.2810        | 0.2810        |                | 0.2594        | 0.2594        |          | 1,297.8688        | 1,297.8688        | 0.4114        |     | 1,308.1547        |
| Paving       | 0.0000        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          |                   | 0.0000            |               |     | 0.0000            |
| <b>Total</b> | <b>0.6180</b> | <b>5.8607</b> | <b>8.8253</b> | <b>0.0136</b> |               | <b>0.2810</b> | <b>0.2810</b> |                | <b>0.2594</b> | <b>0.2594</b> |          | <b>1,297.8688</b> | <b>1,297.8688</b> | <b>0.4114</b> |     | <b>1,308.1547</b> |

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0918        | 0.0489        | 0.6711        | 1.9800e-003        | 0.2299        | 1.1800e-003        | 0.2311        | 0.0610         | 1.0900e-003        | 0.0621        |          | 200.1858        | 200.1858        | 4.7900e-003        | 4.8000e-003        | 201.7356        |
| <b>Total</b> | <b>0.0918</b> | <b>0.0489</b> | <b>0.6711</b> | <b>1.9800e-003</b> | <b>0.2299</b> | <b>1.1800e-003</b> | <b>0.2311</b> | <b>0.0610</b>  | <b>1.0900e-003</b> | <b>0.0621</b> |          | <b>200.1858</b> | <b>200.1858</b> | <b>4.7900e-003</b> | <b>4.8000e-003</b> | <b>201.7356</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.6 Paving - 2024**

**Mitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Off-Road     | 0.6180        | 5.8607        | 8.8253        | 0.0136        |               | 0.2810        | 0.2810        |                | 0.2594        | 0.2594        | 0.0000        | 1,297.8688        | 1,297.8688        | 0.4114        |     | 1,308.1547        |
| Paving       | 0.0000        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |               |                   | 0.0000            |               |     | 0.0000            |
| <b>Total</b> | <b>0.6180</b> | <b>5.8607</b> | <b>8.8253</b> | <b>0.0136</b> |               | <b>0.2810</b> | <b>0.2810</b> |                | <b>0.2594</b> | <b>0.2594</b> | <b>0.0000</b> | <b>1,297.8688</b> | <b>1,297.8688</b> | <b>0.4114</b> |     | <b>1,308.1547</b> |

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0918        | 0.0489        | 0.6711        | 1.9800e-003        | 0.2299        | 1.1800e-003        | 0.2311        | 0.0610         | 1.0900e-003        | 0.0621        |          | 200.1858        | 200.1858        | 4.7900e-003        | 4.8000e-003        | 201.7356        |
| <b>Total</b> | <b>0.0918</b> | <b>0.0489</b> | <b>0.6711</b> | <b>1.9800e-003</b> | <b>0.2299</b> | <b>1.1800e-003</b> | <b>0.2311</b> | <b>0.0610</b>  | <b>1.0900e-003</b> | <b>0.0621</b> |          | <b>200.1858</b> | <b>200.1858</b> | <b>4.7900e-003</b> | <b>4.8000e-003</b> | <b>201.7356</b> |



Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.7 Architectural Coating - 2024**

**Unmitigated Construction On-Site**

|                 | ROG            | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|-----------------|----------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-----------------|-----------------|---------------|-----|-----------------|
| Category        | lb/day         |               |               |                    |               |               |               |                |               |               | lb/day   |                 |                 |               |     |                 |
| Archit. Coating | 49.3628        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          |                 | 0.0000          |               |     | 0.0000          |
| Off-Road        | 0.1808         | 1.2188        | 1.8101        | 2.9700e-003        |               | 0.0609        | 0.0609        |                | 0.0609        | 0.0609        |          | 281.4481        | 281.4481        | 0.0159        |     | 281.8443        |
| <b>Total</b>    | <b>49.5435</b> | <b>1.2188</b> | <b>1.8101</b> | <b>2.9700e-003</b> |               | <b>0.0609</b> | <b>0.0609</b> |                | <b>0.0609</b> | <b>0.0609</b> |          | <b>281.4481</b> | <b>281.4481</b> | <b>0.0159</b> |     | <b>281.8443</b> |

**Unmitigated Construction Off-Site**

|              | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|--------------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |                    |               |                    |               |                    |               |                    |                    |                    | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000             |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0102        | 5.4300e-003        | 0.0746        | 2.2000e-004        | 0.0256        | 1.3000e-004        | 0.0257        | 6.7700e-003        | 1.2000e-004        | 6.9000e-003        |          | 22.2429        | 22.2429        | 5.3000e-004        | 5.3000e-004        | 22.4151        |
| <b>Total</b> | <b>0.0102</b> | <b>5.4300e-003</b> | <b>0.0746</b> | <b>2.2000e-004</b> | <b>0.0256</b> | <b>1.3000e-004</b> | <b>0.0257</b> | <b>6.7700e-003</b> | <b>1.2000e-004</b> | <b>6.9000e-003</b> |          | <b>22.2429</b> | <b>22.2429</b> | <b>5.3000e-004</b> | <b>5.3000e-004</b> | <b>22.4151</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**3.7 Architectural Coating - 2024**

**Mitigated Construction On-Site**

|                 | ROG            | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|-----------------|----------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|-----|-----------------|
| Category        | lb/day         |               |               |                    |               |               |               |                |               |               | lb/day        |                 |                 |               |     |                 |
| Archit. Coating | 49.3628        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |               |                 | 0.0000          |               |     | 0.0000          |
| Off-Road        | 0.1808         | 1.2188        | 1.8101        | 2.9700e-003        |               | 0.0609        | 0.0609        |                | 0.0609        | 0.0609        | 0.0000        | 281.4481        | 281.4481        | 0.0159        |     | 281.8443        |
| <b>Total</b>    | <b>49.5435</b> | <b>1.2188</b> | <b>1.8101</b> | <b>2.9700e-003</b> |               | <b>0.0609</b> | <b>0.0609</b> |                | <b>0.0609</b> | <b>0.0609</b> | <b>0.0000</b> | <b>281.4481</b> | <b>281.4481</b> | <b>0.0159</b> |     | <b>281.8443</b> |

**Mitigated Construction Off-Site**

|              | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|--------------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |                    |               |                    |               |                    |               |                    |                    |                    | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000             |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0102        | 5.4300e-003        | 0.0746        | 2.2000e-004        | 0.0256        | 1.3000e-004        | 0.0257        | 6.7700e-003        | 1.2000e-004        | 6.9000e-003        |          | 22.2429        | 22.2429        | 5.3000e-004        | 5.3000e-004        | 22.4151        |
| <b>Total</b> | <b>0.0102</b> | <b>5.4300e-003</b> | <b>0.0746</b> | <b>2.2000e-004</b> | <b>0.0256</b> | <b>1.3000e-004</b> | <b>0.0257</b> | <b>6.7700e-003</b> | <b>1.2000e-004</b> | <b>6.9000e-003</b> |          | <b>22.2429</b> | <b>22.2429</b> | <b>5.3000e-004</b> | <b>5.3000e-004</b> | <b>22.4151</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**4.0 Operational Detail - Mobile**

**4.1 Mitigation Measures Mobile**

|             | ROG    | NOx    | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4    | N2O    | CO2e     |
|-------------|--------|--------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|--------|--------|----------|
| Category    | lb/day |        |        |             |               |              |            |                |               |             | lb/day   |           |           |        |        |          |
| Mitigated   | 0.2369 | 0.2776 | 2.0873 | 4.4900e-003 | 0.4638        | 3.8600e-003  | 0.4677     | 0.1236         | 3.6100e-003   | 0.1272      |          | 455.8888  | 455.8888  | 0.0261 | 0.0194 | 462.3171 |
| Unmitigated | 0.2369 | 0.2776 | 2.0873 | 4.4900e-003 | 0.4638        | 3.8600e-003  | 0.4677     | 0.1236         | 3.6100e-003   | 0.1272      |          | 455.8888  | 455.8888  | 0.0261 | 0.0194 | 462.3171 |

**4.2 Trip Summary Information**

| Land Use                         | Average Daily Trip Rate |          |        | Unmitigated | Mitigated  |
|----------------------------------|-------------------------|----------|--------|-------------|------------|
|                                  | Weekday                 | Saturday | Sunday | Annual VMT  | Annual VMT |
| Condo/Townhouse                  | 14.64                   | 16.28    | 12.56  | 54,208      | 54,208     |
| Single Family Housing            | 18.88                   | 19.08    | 17.10  | 69,370      | 69,370     |
| Unrefrigerated Warehouse-No Rail | 22.97                   | 22.97    | 22.97  | 88,736      | 88,736     |
| Total                            | 56.49                   | 58.33    | 52.63  | 212,314     | 212,314    |

**4.3 Trip Type Information**

| Land Use                    | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|-----------------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                             | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| Condo/Townhouse             | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |
| Single Family Housing       | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |
| Unrefrigerated Warehouse-No | 14.70      | 6.60       | 6.60        | 59.00      | 0.00       | 41.00       | 92             | 5        | 3       |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**4.4 Fleet Mix**

| Land Use                         | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|----------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Condo/Townhouse                  | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |
| Single Family Housing            | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |
| Unrefrigerated Warehouse-No Rail | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

|                        | ROG         | NOx         | CO          | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total  | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e    |
|------------------------|-------------|-------------|-------------|-------------|---------------|--------------|-------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|---------|
| Category               | lb/day      |             |             |             |               |              |             |                |               |             | lb/day   |           |           |             |             |         |
| NaturalGas Mitigated   | 9.5000e-004 | 8.1200e-003 | 3.4500e-003 | 5.0000e-005 |               | 6.6000e-004  | 6.6000e-004 |                | 6.6000e-004   | 6.6000e-004 |          | 10.3646   | 10.3646   | 2.0000e-004 | 1.9000e-004 | 10.4262 |
| NaturalGas Unmitigated | 9.5000e-004 | 8.1200e-003 | 3.4500e-003 | 5.0000e-005 |               | 6.6000e-004  | 6.6000e-004 |                | 6.6000e-004   | 6.6000e-004 |          | 10.3646   | 10.3646   | 2.0000e-004 | 1.9000e-004 | 10.4262 |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**5.2 Energy by Land Use - NaturalGas**

**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        | lb/day             |                    |                    |                    |               |                    |                    |                |                    |                    | lb/day   |                |                |                    |                    |                |
| Condo/Townhouse                  | 27.1242        | 2.9000e-004        | 2.5000e-003        | 1.0600e-003        | 2.0000e-005        |               | 2.0000e-004        | 2.0000e-004        |                | 2.0000e-004        | 2.0000e-004        |          | 3.1911         | 3.1911         | 6.0000e-005        | 6.0000e-005        | 3.2101         |
| Single Family Housing            | 60.9746        | 6.6000e-004        | 5.6200e-003        | 2.3900e-003        | 4.0000e-005        |               | 4.5000e-004        | 4.5000e-004        |                | 4.5000e-004        | 4.5000e-004        |          | 7.1735         | 7.1735         | 1.4000e-004        | 1.3000e-004        | 7.2161         |
| Unrefrigerated Warehouse-No Rail | 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         |
| <b>Total</b>                     |                | <b>9.5000e-004</b> | <b>8.1200e-003</b> | <b>3.4500e-003</b> | <b>6.0000e-005</b> |               | <b>6.5000e-004</b> | <b>6.5000e-004</b> |                | <b>6.5000e-004</b> | <b>6.5000e-004</b> |          | <b>10.3646</b> | <b>10.3646</b> | <b>2.0000e-004</b> | <b>1.9000e-004</b> | <b>10.4262</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**5.2 Energy by Land Use - NaturalGas**

**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        | lb/day             |                    |                    |                    |               |                    |                    |                |                    |                    | lb/day   |                |                |                    |                    |                |
| Condo/Townhouse                  | 0.0271242      | 2.9000e-004        | 2.5000e-003        | 1.0600e-003        | 2.0000e-005        |               | 2.0000e-004        | 2.0000e-004        |                | 2.0000e-004        | 2.0000e-004        |          | 3.1911         | 3.1911         | 6.0000e-005        | 6.0000e-005        | 3.2101         |
| Single Family Housing            | 0.0609746      | 6.6000e-004        | 5.6200e-003        | 2.3900e-003        | 4.0000e-005        |               | 4.5000e-004        | 4.5000e-004        |                | 4.5000e-004        | 4.5000e-004        |          | 7.1735         | 7.1735         | 1.4000e-004        | 1.3000e-004        | 7.2161         |
| Unrefrigerated Warehouse-No Rail | 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         |
| <b>Total</b>                     |                | <b>9.5000e-004</b> | <b>8.1200e-003</b> | <b>3.4500e-003</b> | <b>6.0000e-005</b> |               | <b>6.5000e-004</b> | <b>6.5000e-004</b> |                | <b>6.5000e-004</b> | <b>6.5000e-004</b> |          | <b>10.3646</b> | <b>10.3646</b> | <b>2.0000e-004</b> | <b>1.9000e-004</b> | <b>10.4262</b> |

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

|             | ROG    | NOx    | CO     | SO2    | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4    | N2O         | CO2e     |
|-------------|--------|--------|--------|--------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|--------|-------------|----------|
| Category    | lb/day |        |        |        |               |              |            |                |               |             | lb/day   |           |           |        |             |          |
| Mitigated   | 6.6777 | 0.1234 | 7.8875 | 0.0137 |               | 1.0613       | 1.0613     |                | 1.0613        | 1.0613      | 111.0869 | 47.1853   | 158.2723  | 0.1031 | 8.7400e-003 | 163.4534 |
| Unmitigated | 6.6777 | 0.1234 | 7.8875 | 0.0137 |               | 1.0613       | 1.0613     |                | 1.0613        | 1.0613      | 111.0869 | 47.1853   | 158.2723  | 0.1031 | 8.7400e-003 | 163.4534 |

**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           | lb/day        |               |               |               |               |               |               |                |               |               | lb/day          |                |                 |               |                    |                 |
| Architectural Coating | 0.1352        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Consumer Products     | 0.4109        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Hearth                | 6.1216        | 0.1196        | 7.5564        | 0.0137        |               | 1.0595        | 1.0595        |                | 1.0595        | 1.0595        | 111.0869        | 46.5882        | 157.6752        | 0.1025        | 8.7400e-003        | 162.8419        |
| Landscaping           | 0.0100        | 3.8100e-003   | 0.3310        | 2.0000e-005   |               | 1.8300e-003   | 1.8300e-003   |                | 1.8300e-003   | 1.8300e-003   |                 | 0.5971         | 0.5971          | 5.8000e-004   |                    | 0.6115          |
| <b>Total</b>          | <b>6.6777</b> | <b>0.1234</b> | <b>7.8875</b> | <b>0.0137</b> |               | <b>1.0613</b> | <b>1.0613</b> |                | <b>1.0613</b> | <b>1.0613</b> | <b>111.0869</b> | <b>47.1853</b> | <b>158.2723</b> | <b>0.1031</b> | <b>8.7400e-003</b> | <b>163.4534</b> |

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2        | NBio- CO2      | Total CO2       | CH4           | N2O                | CO2e            |
|-----------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|-----------------|----------------|-----------------|---------------|--------------------|-----------------|
| SubCategory           | lb/day        |               |               |               |               |               |               |                |               |               | lb/day          |                |                 |               |                    |                 |
| Architectural Coating | 0.1352        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Consumer Products     | 0.4109        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Hearth                | 6.1216        | 0.1196        | 7.5564        | 0.0137        |               | 1.0595        | 1.0595        |                | 1.0595        | 1.0595        | 111.0869        | 46.5882        | 157.6752        | 0.1025        | 8.7400e-003        | 162.8419        |
| Landscaping           | 0.0100        | 3.8100e-003   | 0.3310        | 2.0000e-005   |               | 1.8300e-003   | 1.8300e-003   |                | 1.8300e-003   | 1.8300e-003   |                 | 0.5971         | 0.5971          | 5.8000e-004   |                    | 0.6115          |
| <b>Total</b>          | <b>6.6777</b> | <b>0.1234</b> | <b>7.8875</b> | <b>0.0137</b> |               | <b>1.0613</b> | <b>1.0613</b> |                | <b>1.0613</b> | <b>1.0613</b> | <b>111.0869</b> | <b>47.1853</b> | <b>158.2723</b> | <b>0.1031</b> | <b>8.7400e-003</b> | <b>163.4534</b> |

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

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| Equipment Type     | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|--------------------|--------|-----------|-----------|-------------|-------------|-----------|
| Forklifts          | 1      | 4.00      | 260       | 89          | 0.20        | Diesel    |
| Off-Highway Trucks | 1      | 2.00      | 260       | 402         | 0.38        | Diesel    |



Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

|                           |   |      |     |    |             |
|---------------------------|---|------|-----|----|-------------|
| Tractors/Loaders/Backhoes | 1 | 4.00 | 260 | 97 | 0.37 Diesel |
|---------------------------|---|------|-----|----|-------------|

**UnMitigated/Mitigated**

|                           | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|---------------------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|-----|-----------------|
| Equipment Type            | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day        |                 |                 |               |     |                 |
| Forklifts                 | 0.0437        | 0.4113        | 0.5697        | 7.7000e-004        |               | 0.0220        | 0.0220        |                | 0.0203        | 0.0203        | 0.0000        | 74.3855         | 74.3855         | 0.0241        |     | 74.9869         |
| Off-Highway Trucks        | 0.1200        | 0.7201        | 0.8004        | 3.3200e-003        |               | 0.0257        | 0.0257        |                | 0.0237        | 0.0237        | 0.0000        | 321.5185        | 321.5185        | 0.1040        |     | 324.1181        |
| Tractors/Loaders/Backhoes | 0.0658        | 0.6648        | 1.1103        | 1.5500e-003        |               | 0.0269        | 0.0269        |                | 0.0248        | 0.0248        | 0.0000        | 150.4157        | 150.4157        | 0.0487        |     | 151.6318        |
| <b>Total</b>              | <b>0.2295</b> | <b>1.7963</b> | <b>2.4804</b> | <b>5.6400e-003</b> |               | <b>0.0747</b> | <b>0.0747</b> |                | <b>0.0687</b> | <b>0.0687</b> | <b>0.0000</b> | <b>546.3196</b> | <b>546.3196</b> | <b>0.1767</b> |     | <b>550.7369</b> |

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

| Equipment Type      | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|------------|-------------|-------------|-----------|
| Emergency Generator | 1      | 0         | 50         | 202         | 0.73        | CNG       |

**Boilers**

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

Apogee-Field Crops - Great Basin UAPCD Air District, Summer

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

**10.1 Stationary Sources**

**Unmitigated/Mitigated**

|  | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2     | Total CO2     | CH4           | N2O | CO2e |               |
|--|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|---------------|---------------|---------------|-----|------|---------------|
| Equipment Type                         | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |               |               |               |     |      |               |
| Emergency Generator - CNG (0 - 500 HP) | 0.0000        | 0.0000        | 0.0000        | 0.0000        |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          | 0.0000        | 0.0000        | 0.0000        |     |      | 0.0000        |
| <b>Total</b>                           | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |               | <b>0.0000</b> | <b>0.0000</b> |                | <b>0.0000</b> | <b>0.0000</b> |          | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |     |      | <b>0.0000</b> |

**11.0 Vegetation**

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

**Apogee-Livestock  
Great Basin UAPCD Air District, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

| Land Uses              | Size | Metric        | Lot Acreage | Floor Surface Area | Population |
|------------------------|------|---------------|-------------|--------------------|------------|
| General Light Industry | 4.00 | 1000sqft      | 0.09        | 4,000.00           | 0          |
| Single Family Housing  | 2.00 | Dwelling Unit | 0.65        | 4,000.00           | 6          |
| Condo/Townhouse        | 2.00 | Dwelling Unit | 0.13        | 2,000.00           | 6          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          | <b>Operational Year</b>        | 2025  |                                  |       |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

Project Characteristics -

Land Use - General Light Industry - Livestock Barn; Single Family Housing - Single Family Dwelling Units; Condo - Accessory Dwelling Units

Demolition -

Trips and VMT - Building construction materials hauling trip - 1 trip per 150 square feet of construction.

Water And Wastewater - General light industry = water use for 39 cattles \* 30.5 gals/day each.

Operational Off-Road Equipment - Off-road equipment = typical equipment needed to feed livestock.

Stationary Sources - Emergency Generators and Fire Pumps - 50 hours/year is required for back-up generator maintenance.

Construction Off-road Equipment Mitigation -

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

| Table Name                      | Column Name                | Default Value | New Value  |
|---------------------------------|----------------------------|---------------|------------|
| tblLandUse                      | LandUseSquareFeet          | 3,600.00      | 4,000.00   |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 2.00       |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 2.00       |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00       |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00       |
| tblProjectCharacteristics       | UrbanizationLevel          | Urban         | Rural      |
| tblStationaryGeneratorsPumpsUse | HorsePowerValue            | 0.00          | 202.00     |
| tblStationaryGeneratorsPumpsUse | HoursPerYear               | 0.00          | 50.00      |
| tblStationaryGeneratorsPumpsUse | NumberOfEquipment          | 0.00          | 1.00       |
| tblTripsAndVMT                  | HaulingTripNumber          | 2.00          | 49.00      |
| tblTripsAndVMT                  | HaulingTripNumber          | 0.00          | 67.00      |
| tblWater                        | OutdoorWaterUseRate        | 0.00          | 108,542.00 |

**2.0 Emissions Summary**

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

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---------|------------|----------|--|--|
| 1       | 1-2-2024   | 4-1-2024 | 0.2224                                       | 0.2224                                     |
| 2       | 4-2-2024   | 7-1-2024 | 0.3174                                       | 0.3174                                     |
|         |            | Highest  | 0.3174                                       | 0.3174                                     |

**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         | 0.3050        | 5.2400e-003   | 0.3395        | 5.6000e-004        |               | 0.0436        | 0.0436        |                | 0.0436        | 0.0436        | 4.1318        | 1.7814          | 5.9133          | 3.8600e-003   | 3.2000e-004        | 6.1066          |
| Energy       | 2.5000e-004   | 2.1600e-003   | 1.2000e-003   | 1.0000e-005        |               | 1.7000e-004   | 1.7000e-004   |                | 1.7000e-004   | 1.7000e-004   | 0.0000        | 10.0480         | 10.0480         | 6.9000e-004   | 1.2000e-004        | 10.1018         |
| Mobile       | 0.0364        | 0.0488        | 0.3505        | 7.0000e-004        | 0.0719        | 6.2000e-004   | 0.0725        | 0.0192         | 5.8000e-004   | 0.0198        | 0.0000        | 64.1847         | 64.1847         | 4.0800e-003   | 3.0000e-003        | 65.1815         |
| Offroad      | 0.0366        | 0.3087        | 0.2010        | 7.1000e-004        |               | 0.0128        | 0.0128        |                | 0.0117        | 0.0117        | 0.0000        | 62.1109         | 62.1109         | 0.0201        | 0.0000             | 62.6131         |
| Stationary   | 0.0444        | 4.2800e-003   | 0.1157        | 2.0000e-005        |               | 2.5000e-004   | 2.5000e-004   |                | 2.5000e-004   | 2.5000e-004   | 0.0000        | 2.5752          | 2.5752          | 5.3800e-003   | 0.0000             | 2.7098          |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 1.4981        | 0.0000          | 1.4981          | 0.0885        | 0.0000             | 3.7114          |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.3761        | 1.3071          | 1.6832          | 0.0387        | 9.3000e-004        | 2.9277          |
| <b>Total</b> | <b>0.4226</b> | <b>0.3692</b> | <b>1.0079</b> | <b>2.0000e-003</b> | <b>0.0719</b> | <b>0.0574</b> | <b>0.1293</b> | <b>0.0192</b>  | <b>0.0563</b> | <b>0.0755</b> | <b>6.0060</b> | <b>142.0073</b> | <b>148.0134</b> | <b>0.1614</b> | <b>4.3700e-003</b> | <b>153.3518</b> |

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|--------------------|-----------------|
| Category     | tons/yr       |               |               |                    |               |               |               |                |               |               | MT/yr         |                 |                 |               |                    |                 |
| Area         | 0.3050        | 5.2400e-003   | 0.3395        | 5.6000e-004        |               | 0.0436        | 0.0436        |                | 0.0436        | 0.0436        | 4.1318        | 1.7814          | 5.9133          | 3.8600e-003   | 3.2000e-004        | 6.1066          |
| Energy       | 2.5000e-004   | 2.1600e-003   | 1.2000e-003   | 1.0000e-005        |               | 1.7000e-004   | 1.7000e-004   |                | 1.7000e-004   | 1.7000e-004   | 0.0000        | 10.0480         | 10.0480         | 6.9000e-004   | 1.2000e-004        | 10.1018         |
| Mobile       | 0.0364        | 0.0488        | 0.3505        | 7.0000e-004        | 0.0719        | 6.2000e-004   | 0.0725        | 0.0192         | 5.8000e-004   | 0.0198        | 0.0000        | 64.1847         | 64.1847         | 4.0800e-003   | 3.0000e-003        | 65.1815         |
| Offroad      | 0.0366        | 0.3087        | 0.2010        | 7.1000e-004        |               | 0.0128        | 0.0128        |                | 0.0117        | 0.0117        | 0.0000        | 62.1109         | 62.1109         | 0.0201        | 0.0000             | 62.6131         |
| Stationary   | 0.0444        | 4.2800e-003   | 0.1157        | 2.0000e-005        |               | 2.5000e-004   | 2.5000e-004   |                | 2.5000e-004   | 2.5000e-004   | 0.0000        | 2.5752          | 2.5752          | 5.3800e-003   | 0.0000             | 2.7098          |
| Waste        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 1.4981        | 0.0000          | 1.4981          | 0.0885        | 0.0000             | 3.7114          |
| Water        |               |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.3761        | 1.3071          | 1.6832          | 0.0387        | 9.3000e-004        | 2.9277          |
| <b>Total</b> | <b>0.4226</b> | <b>0.3692</b> | <b>1.0079</b> | <b>2.0000e-003</b> | <b>0.0719</b> | <b>0.0574</b> | <b>0.1293</b> | <b>0.0192</b>  | <b>0.0563</b> | <b>0.0755</b> | <b>6.0060</b> | <b>142.0073</b> | <b>148.0134</b> | <b>0.1614</b> | <b>4.3700e-003</b> | <b>153.3518</b> |

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

**3.0 Construction Detail**

**Construction Phase**

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

| Phase Number | Phase Name            | Phase Type            | Start Date | End Date  | Num Days Week | Num Days | Phase Description |
|--------------|-----------------------|-----------------------|------------|-----------|---------------|----------|-------------------|
| 1            | Demolition            | Demolition            | 1/2/2024   | 1/15/2024 | 5             | 10       |                   |
| 2            | Site Preparation      | Site Preparation      | 1/16/2024  | 1/16/2024 | 5             | 1        |                   |
| 3            | Grading               | Grading               | 1/17/2024  | 1/18/2024 | 5             | 2        |                   |
| 4            | Building Construction | Building Construction | 1/19/2024  | 6/6/2024  | 5             | 100      |                   |
| 5            | Paving                | Paving                | 6/7/2024   | 6/13/2024 | 5             | 5        |                   |
| 6            | Architectural Coating | Architectural Coating | 6/14/2024  | 6/20/2024 | 5             | 5        |                   |

**Acres of Grading (Site Preparation Phase): 0.5**

**Acres of Grading (Grading Phase): 1.5**

**Acres of Paving: 0**

**Residential Indoor: 12,150; Residential Outdoor: 4,050; Non-Residential Indoor: 6,000; Non-Residential Outdoor: 2,000; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name            | Offroad Equipment Type    | Amount | Usage Hours | Horse Power | Load Factor |
|-----------------------|---------------------------|--------|-------------|-------------|-------------|
| Architectural Coating | Air Compressors           | 1      | 6.00        | 78          | 0.48        |
| Paving                | Cement and Mortar Mixers  | 4      | 6.00        | 9           | 0.56        |
| Demolition            | Concrete/Industrial Saws  | 1      | 8.00        | 81          | 0.73        |
| Building Construction | Cranes                    | 1      | 4.00        | 231         | 0.29        |
| Building Construction | Forklifts                 | 2      | 6.00        | 89          | 0.20        |
| Grading               | Graders                   | 1      | 6.00        | 187         | 0.41        |
| Site Preparation      | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Paving                | Pavers                    | 1      | 7.00        | 130         | 0.42        |
| Paving                | Rollers                   | 1      | 7.00        | 80          | 0.38        |
| Demolition            | Rubber Tired Dozers       | 1      | 1.00        | 247         | 0.40        |
| Grading               | Rubber Tired Dozers       | 1      | 6.00        | 247         | 0.40        |
| Building Construction | Tractors/Loaders/Backhoes | 2      | 8.00        | 97          | 0.37        |



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

|                  |                           |   |      |    |      |
|------------------|---------------------------|---|------|----|------|
| Demolition       | Tractors/Loaders/Backhoes | 2 | 6.00 | 97 | 0.37 |
| Grading          | Tractors/Loaders/Backhoes | 1 | 7.00 | 97 | 0.37 |
| Paving           | Tractors/Loaders/Backhoes | 1 | 7.00 | 97 | 0.37 |
| Site Preparation | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            | 4                       | 10.00              | 0.00               | 49.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Site Preparation      | 2                       | 5.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Grading               | 3                       | 8.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Building Construction | 5                       | 4.00               | 1.00               | 67.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Paving                | 7                       | 18.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Architectural Coating | 1                       | 1.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |

**3.1 Mitigation Measures Construction**

Water Exposed Area

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

**3.2 Demolition - 2024**

**Unmitigated Construction On-Site**

|               | ROG                | NOx           | CO            | SO2                | Fugitive PM10      | Exhaust PM10       | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|---------------|--------------------|---------------|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category      | tons/yr            |               |               |                    |                    |                    |                    |                    |                    |                    | MT/yr         |               |               |                    |               |               |
| Fugitive Dust |                    |               |               |                    | 2.5000e-004        | 0.0000             | 2.5000e-004        | 4.0000e-005        | 0.0000             | 4.0000e-005        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 3.0800e-003        | 0.0274        | 0.0370        | 6.0000e-005        |                    | 1.2500e-003        | 1.2500e-003        |                    | 1.2000e-003        | 1.2000e-003        | 0.0000        | 5.2104        | 5.2104        | 9.4000e-004        | 0.0000        | 5.2339        |
| <b>Total</b>  | <b>3.0800e-003</b> | <b>0.0274</b> | <b>0.0370</b> | <b>6.0000e-005</b> | <b>2.5000e-004</b> | <b>1.2500e-003</b> | <b>1.5000e-003</b> | <b>4.0000e-005</b> | <b>1.2000e-003</b> | <b>1.2400e-003</b> | <b>0.0000</b> | <b>5.2104</b> | <b>5.2104</b> | <b>9.4000e-004</b> | <b>0.0000</b> | <b>5.2339</b> |

**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      | 7.0000e-005        | 3.3100e-003        | 8.1000e-004        | 1.0000e-005        | 4.2000e-004        | 3.0000e-005        | 4.5000e-004        | 1.1000e-004        | 3.0000e-005        | 1.5000e-004        | 0.0000        | 1.3450        | 1.3450        | 0.0000             | 2.1000e-004        | 1.4080        |
| 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       | 2.5000e-004        | 1.6000e-004        | 1.8100e-003        | 1.0000e-005        | 6.2000e-004        | 0.0000             | 6.2000e-004        | 1.6000e-004        | 0.0000             | 1.7000e-004        | 0.0000        | 0.4843        | 0.4843        | 1.0000e-005        | 1.0000e-005        | 0.4886        |
| <b>Total</b> | <b>3.2000e-004</b> | <b>3.4700e-003</b> | <b>2.6200e-003</b> | <b>2.0000e-005</b> | <b>1.0400e-003</b> | <b>3.0000e-005</b> | <b>1.0700e-003</b> | <b>2.7000e-004</b> | <b>3.0000e-005</b> | <b>3.2000e-004</b> | <b>0.0000</b> | <b>1.8293</b> | <b>1.8293</b> | <b>1.0000e-005</b> | <b>2.2000e-004</b> | <b>1.8967</b> |

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

**3.2 Demolition - 2024**

**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 |                    |               |               |                    | 1.1000e-004        | 0.0000             | 1.1000e-004        | 2.0000e-005        | 0.0000             | 2.0000e-005        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 3.0800e-003        | 0.0274        | 0.0370        | 6.0000e-005        |                    | 1.2500e-003        | 1.2500e-003        |                    | 1.2000e-003        | 1.2000e-003        | 0.0000        | 5.2104        | 5.2104        | 9.4000e-004        | 0.0000        | 5.2339        |
| <b>Total</b>  | <b>3.0800e-003</b> | <b>0.0274</b> | <b>0.0370</b> | <b>6.0000e-005</b> | <b>1.1000e-004</b> | <b>1.2500e-003</b> | <b>1.3600e-003</b> | <b>2.0000e-005</b> | <b>1.2000e-003</b> | <b>1.2200e-003</b> | <b>0.0000</b> | <b>5.2104</b> | <b>5.2104</b> | <b>9.4000e-004</b> | <b>0.0000</b> | <b>5.2339</b> |

**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      | 7.0000e-005        | 3.3100e-003        | 8.1000e-004        | 1.0000e-005        | 4.2000e-004        | 3.0000e-005        | 4.5000e-004        | 1.1000e-004        | 3.0000e-005        | 1.5000e-004        | 0.0000        | 1.3450        | 1.3450        | 0.0000             | 2.1000e-004        | 1.4080        |
| 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       | 2.5000e-004        | 1.6000e-004        | 1.8100e-003        | 1.0000e-005        | 6.2000e-004        | 0.0000             | 6.2000e-004        | 1.6000e-004        | 0.0000             | 1.7000e-004        | 0.0000        | 0.4843        | 0.4843        | 1.0000e-005        | 1.0000e-005        | 0.4886        |
| <b>Total</b> | <b>3.2000e-004</b> | <b>3.4700e-003</b> | <b>2.6200e-003</b> | <b>2.0000e-005</b> | <b>1.0400e-003</b> | <b>3.0000e-005</b> | <b>1.0700e-003</b> | <b>2.7000e-004</b> | <b>3.0000e-005</b> | <b>3.2000e-004</b> | <b>0.0000</b> | <b>1.8293</b> | <b>1.8293</b> | <b>1.0000e-005</b> | <b>2.2000e-004</b> | <b>1.8967</b> |

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

**3.3 Site Preparation - 2024**

**Unmitigated Construction On-Site**

|               | ROG                | NOx                | CO                 | SO2           | Fugitive PM10      | Exhaust PM10       | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|---------------|--------------------|--------------------|--------------------|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category      | tons/yr            |                    |                    |               |                    |                    |                    |                    |                    |                    | MT/yr         |               |               |                    |               |               |
| Fugitive Dust |                    |                    |                    |               | 2.7000e-004        | 0.0000             | 2.7000e-004        | 3.0000e-005        | 0.0000             | 3.0000e-005        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 2.5000e-004        | 2.8000e-003        | 1.9500e-003        | 0.0000        |                    | 1.0000e-004        | 1.0000e-004        |                    | 9.0000e-005        | 9.0000e-005        | 0.0000        | 0.4274        | 0.4274        | 1.4000e-004        | 0.0000        | 0.4309        |
| <b>Total</b>  | <b>2.5000e-004</b> | <b>2.8000e-003</b> | <b>1.9500e-003</b> | <b>0.0000</b> | <b>2.7000e-004</b> | <b>1.0000e-004</b> | <b>3.7000e-004</b> | <b>3.0000e-005</b> | <b>9.0000e-005</b> | <b>1.2000e-004</b> | <b>0.0000</b> | <b>0.4274</b> | <b>0.4274</b> | <b>1.4000e-004</b> | <b>0.0000</b> | <b>0.4309</b> |

**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       | 1.0000e-005        | 1.0000e-005        | 9.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 1.0000e-005        | 0.0000        | 1.0000e-005        | 0.0000        | 0.0242        | 0.0242        | 0.0000        | 0.0000        | 0.0244        |
| <b>Total</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>9.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>0.0242</b> | <b>0.0242</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0244</b> |

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

**3.3 Site Preparation - 2024**

**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 |                    |                    |                    |               | 1.2000e-004        | 0.0000             | 1.2000e-004        | 1.0000e-005        | 0.0000             | 1.0000e-005        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 2.5000e-004        | 2.8000e-003        | 1.9500e-003        | 0.0000        |                    | 1.0000e-004        | 1.0000e-004        |                    | 9.0000e-005        | 9.0000e-005        | 0.0000        | 0.4274        | 0.4274        | 1.4000e-004        | 0.0000        | 0.4309        |
| <b>Total</b>  | <b>2.5000e-004</b> | <b>2.8000e-003</b> | <b>1.9500e-003</b> | <b>0.0000</b> | <b>1.2000e-004</b> | <b>1.0000e-004</b> | <b>2.2000e-004</b> | <b>1.0000e-005</b> | <b>9.0000e-005</b> | <b>1.0000e-004</b> | <b>0.0000</b> | <b>0.4274</b> | <b>0.4274</b> | <b>1.4000e-004</b> | <b>0.0000</b> | <b>0.4309</b> |

**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       | 1.0000e-005        | 1.0000e-005        | 9.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 1.0000e-005        | 0.0000        | 1.0000e-005        | 0.0000        | 0.0242        | 0.0242        | 0.0000        | 0.0000        | 0.0244        |
| <b>Total</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>9.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>0.0242</b> | <b>0.0242</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0244</b> |

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

**3.4 Grading - 2024**

**Unmitigated Construction On-Site**

|               | ROG                | NOx                | CO                 | SO2                | Fugitive PM10      | Exhaust PM10       | PM10 Total         | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|---------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Category      | tons/yr            |                    |                    |                    |                    |                    |                    |                    |                    |                    | MT/yr         |               |               |                    |               |               |
| Fugitive Dust |                    |                    |                    |                    | 5.3100e-003        | 0.0000             | 5.3100e-003        | 2.5700e-003        | 0.0000             | 2.5700e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 9.1000e-004        | 9.7300e-003        | 5.5500e-003        | 1.0000e-005        |                    | 4.0000e-004        | 4.0000e-004        |                    | 3.7000e-004        | 3.7000e-004        | 0.0000        | 1.2380        | 1.2380        | 4.0000e-004        | 0.0000        | 1.2480        |
| <b>Total</b>  | <b>9.1000e-004</b> | <b>9.7300e-003</b> | <b>5.5500e-003</b> | <b>1.0000e-005</b> | <b>5.3100e-003</b> | <b>4.0000e-004</b> | <b>5.7100e-003</b> | <b>2.5700e-003</b> | <b>3.7000e-004</b> | <b>2.9400e-003</b> | <b>0.0000</b> | <b>1.2380</b> | <b>1.2380</b> | <b>4.0000e-004</b> | <b>0.0000</b> | <b>1.2480</b> |

**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       | 4.0000e-005        | 3.0000e-005        | 2.9000e-004        | 0.0000        | 1.0000e-004        | 0.0000        | 1.0000e-004        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 0.0775        | 0.0775        | 0.0000        | 0.0000        | 0.0782        |
| <b>Total</b> | <b>4.0000e-005</b> | <b>3.0000e-005</b> | <b>2.9000e-004</b> | <b>0.0000</b> | <b>1.0000e-004</b> | <b>0.0000</b> | <b>1.0000e-004</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>0.0775</b> | <b>0.0775</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0782</b> |

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

**3.4 Grading - 2024**

**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 |                    |                    |                    |                    | 2.3900e-003        | 0.0000             | 2.3900e-003        | 1.1600e-003        | 0.0000             | 1.1600e-003        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road      | 9.1000e-004        | 9.7300e-003        | 5.5500e-003        | 1.0000e-005        |                    | 4.0000e-004        | 4.0000e-004        |                    | 3.7000e-004        | 3.7000e-004        | 0.0000        | 1.2380        | 1.2380        | 4.0000e-004        | 0.0000        | 1.2480        |
| <b>Total</b>  | <b>9.1000e-004</b> | <b>9.7300e-003</b> | <b>5.5500e-003</b> | <b>1.0000e-005</b> | <b>2.3900e-003</b> | <b>4.0000e-004</b> | <b>2.7900e-003</b> | <b>1.1600e-003</b> | <b>3.7000e-004</b> | <b>1.5300e-003</b> | <b>0.0000</b> | <b>1.2380</b> | <b>1.2380</b> | <b>4.0000e-004</b> | <b>0.0000</b> | <b>1.2480</b> |

**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       | 4.0000e-005        | 3.0000e-005        | 2.9000e-004        | 0.0000        | 1.0000e-004        | 0.0000        | 1.0000e-004        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 0.0775        | 0.0775        | 0.0000        | 0.0000        | 0.0782        |
| <b>Total</b> | <b>4.0000e-005</b> | <b>3.0000e-005</b> | <b>2.9000e-004</b> | <b>0.0000</b> | <b>1.0000e-004</b> | <b>0.0000</b> | <b>1.0000e-004</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>0.0775</b> | <b>0.0775</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0782</b> |

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

**3.5 Building Construction - 2024**

**Unmitigated Construction 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     | 0.0298        | 0.2987        | 0.3534        | 5.7000e-004        |               | 0.0141        | 0.0141        |                | 0.0130        | 0.0130        | 0.0000        | 50.1212        | 50.1212        | 0.0162        | 0.0000        | 50.5265        |
| <b>Total</b> | <b>0.0298</b> | <b>0.2987</b> | <b>0.3534</b> | <b>5.7000e-004</b> |               | <b>0.0141</b> | <b>0.0141</b> |                | <b>0.0130</b> | <b>0.0130</b> | <b>0.0000</b> | <b>50.1212</b> | <b>50.1212</b> | <b>0.0162</b> | <b>0.0000</b> | <b>50.5265</b> |

**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      | 9.0000e-005        | 4.5200e-003        | 1.1100e-003        | 2.0000e-005        | 5.7000e-004        | 4.0000e-005        | 6.2000e-004        | 1.6000e-004        | 4.0000e-005        | 2.0000e-004        | 0.0000        | 1.8391        | 1.8391        | 0.0000             | 2.9000e-004        | 1.9253        |
| Vendor       | 1.2000e-004        | 2.2000e-003        | 1.0600e-003        | 1.0000e-005        | 3.0000e-004        | 1.0000e-005        | 3.1000e-004        | 9.0000e-005        | 1.0000e-005        | 1.0000e-004        | 0.0000        | 0.9302        | 0.9302        | 1.0000e-005        | 1.2000e-004        | 0.9661        |
| Worker       | 1.0200e-003        | 6.3000e-004        | 7.2300e-003        | 2.0000e-005        | 2.4700e-003        | 1.0000e-005        | 2.4900e-003        | 6.6000e-004        | 1.0000e-005        | 6.7000e-004        | 0.0000        | 1.9372        | 1.9372        | 5.0000e-005        | 5.0000e-005        | 1.9545        |
| <b>Total</b> | <b>1.2300e-003</b> | <b>7.3500e-003</b> | <b>9.4000e-003</b> | <b>5.0000e-005</b> | <b>3.3400e-003</b> | <b>6.0000e-005</b> | <b>3.4200e-003</b> | <b>9.1000e-004</b> | <b>6.0000e-005</b> | <b>9.7000e-004</b> | <b>0.0000</b> | <b>4.7064</b> | <b>4.7064</b> | <b>6.0000e-005</b> | <b>4.6000e-004</b> | <b>4.8459</b> |



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

**3.5 Building Construction - 2024**

**Mitigated Construction 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     | 0.0298        | 0.2987        | 0.3534        | 5.7000e-004        |               | 0.0141        | 0.0141        |                | 0.0130        | 0.0130        | 0.0000        | 50.1211        | 50.1211        | 0.0162        | 0.0000        | 50.5264        |
| <b>Total</b> | <b>0.0298</b> | <b>0.2987</b> | <b>0.3534</b> | <b>5.7000e-004</b> |               | <b>0.0141</b> | <b>0.0141</b> |                | <b>0.0130</b> | <b>0.0130</b> | <b>0.0000</b> | <b>50.1211</b> | <b>50.1211</b> | <b>0.0162</b> | <b>0.0000</b> | <b>50.5264</b> |

**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      | 9.0000e-005        | 4.5200e-003        | 1.1100e-003        | 2.0000e-005        | 5.7000e-004        | 4.0000e-005        | 6.2000e-004        | 1.6000e-004        | 4.0000e-005        | 2.0000e-004        | 0.0000        | 1.8391        | 1.8391        | 0.0000             | 2.9000e-004        | 1.9253        |
| Vendor       | 1.2000e-004        | 2.2000e-003        | 1.0600e-003        | 1.0000e-005        | 3.0000e-004        | 1.0000e-005        | 3.1000e-004        | 9.0000e-005        | 1.0000e-005        | 1.0000e-004        | 0.0000        | 0.9302        | 0.9302        | 1.0000e-005        | 1.2000e-004        | 0.9661        |
| Worker       | 1.0200e-003        | 6.3000e-004        | 7.2300e-003        | 2.0000e-005        | 2.4700e-003        | 1.0000e-005        | 2.4900e-003        | 6.6000e-004        | 1.0000e-005        | 6.7000e-004        | 0.0000        | 1.9372        | 1.9372        | 5.0000e-005        | 5.0000e-005        | 1.9545        |
| <b>Total</b> | <b>1.2300e-003</b> | <b>7.3500e-003</b> | <b>9.4000e-003</b> | <b>5.0000e-005</b> | <b>3.3400e-003</b> | <b>6.0000e-005</b> | <b>3.4200e-003</b> | <b>9.1000e-004</b> | <b>6.0000e-005</b> | <b>9.7000e-004</b> | <b>0.0000</b> | <b>4.7064</b> | <b>4.7064</b> | <b>6.0000e-005</b> | <b>4.6000e-004</b> | <b>4.8459</b> |

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

**3.6 Paving - 2024**

**Unmitigated Construction 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     | 1.4800e-003        | 0.0131        | 0.0176        | 3.0000e-005        |               | 6.1000e-004        | 6.1000e-004        |                | 5.7000e-004        | 5.7000e-004        | 0.0000        | 2.3502        | 2.3502        | 6.8000e-004        | 0.0000        | 2.3673        |
| Paving       | 0.0000             |               |               |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| <b>Total</b> | <b>1.4800e-003</b> | <b>0.0131</b> | <b>0.0176</b> | <b>3.0000e-005</b> |               | <b>6.1000e-004</b> | <b>6.1000e-004</b> |                | <b>5.7000e-004</b> | <b>5.7000e-004</b> | <b>0.0000</b> | <b>2.3502</b> | <b>2.3502</b> | <b>6.8000e-004</b> | <b>0.0000</b> | <b>2.3673</b> |

**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       | 2.3000e-004        | 1.4000e-004        | 1.6300e-003        | 0.0000        | 5.6000e-004        | 0.0000        | 5.6000e-004        | 1.5000e-004        | 0.0000        | 1.5000e-004        | 0.0000        | 0.4359        | 0.4359        | 1.0000e-005        | 1.0000e-005        | 0.4398        |
| <b>Total</b> | <b>2.3000e-004</b> | <b>1.4000e-004</b> | <b>1.6300e-003</b> | <b>0.0000</b> | <b>5.6000e-004</b> | <b>0.0000</b> | <b>5.6000e-004</b> | <b>1.5000e-004</b> | <b>0.0000</b> | <b>1.5000e-004</b> | <b>0.0000</b> | <b>0.4359</b> | <b>0.4359</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>0.4398</b> |

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

**3.6 Paving - 2024**

**Mitigated Construction 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     | 1.4800e-003        | 0.0131        | 0.0176        | 3.0000e-005        |               | 6.1000e-004        | 6.1000e-004        |                | 5.7000e-004        | 5.7000e-004        | 0.0000        | 2.3502        | 2.3502        | 6.8000e-004        | 0.0000        | 2.3673        |
| Paving       | 0.0000             |               |               |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| <b>Total</b> | <b>1.4800e-003</b> | <b>0.0131</b> | <b>0.0176</b> | <b>3.0000e-005</b> |               | <b>6.1000e-004</b> | <b>6.1000e-004</b> |                | <b>5.7000e-004</b> | <b>5.7000e-004</b> | <b>0.0000</b> | <b>2.3502</b> | <b>2.3502</b> | <b>6.8000e-004</b> | <b>0.0000</b> | <b>2.3673</b> |

**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       | 2.3000e-004        | 1.4000e-004        | 1.6300e-003        | 0.0000        | 5.6000e-004        | 0.0000        | 5.6000e-004        | 1.5000e-004        | 0.0000        | 1.5000e-004        | 0.0000        | 0.4359        | 0.4359        | 1.0000e-005        | 1.0000e-005        | 0.4398        |
| <b>Total</b> | <b>2.3000e-004</b> | <b>1.4000e-004</b> | <b>1.6300e-003</b> | <b>0.0000</b> | <b>5.6000e-004</b> | <b>0.0000</b> | <b>5.6000e-004</b> | <b>1.5000e-004</b> | <b>0.0000</b> | <b>1.5000e-004</b> | <b>0.0000</b> | <b>0.4359</b> | <b>0.4359</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>0.4398</b> |

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

**3.7 Architectural Coating - 2024**

**Unmitigated Construction 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 | 0.1402        |                    |                    |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road        | 4.5000e-004   | 3.0500e-003        | 4.5300e-003        | 1.0000e-005        |               | 1.5000e-004        | 1.5000e-004        |                | 1.5000e-004        | 1.5000e-004        | 0.0000        | 0.6383        | 0.6383        | 4.0000e-005        | 0.0000        | 0.6392        |
| <b>Total</b>    | <b>0.1407</b> | <b>3.0500e-003</b> | <b>4.5300e-003</b> | <b>1.0000e-005</b> |               | <b>1.5000e-004</b> | <b>1.5000e-004</b> |                | <b>1.5000e-004</b> | <b>1.5000e-004</b> | <b>0.0000</b> | <b>0.6383</b> | <b>0.6383</b> | <b>4.0000e-005</b> | <b>0.0000</b> | <b>0.6392</b> |

**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       | 1.0000e-005        | 1.0000e-005        | 9.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 1.0000e-005        | 0.0000        | 1.0000e-005        | 0.0000        | 0.0242        | 0.0242        | 0.0000        | 0.0000        | 0.0244        |
| <b>Total</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>9.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>0.0242</b> | <b>0.0242</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0244</b> |

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

**3.7 Architectural Coating - 2024**

**Mitigated Construction 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 | 0.1402        |                    |                    |                    |               | 0.0000             | 0.0000             |                | 0.0000             | 0.0000             | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000        |
| Off-Road        | 4.5000e-004   | 3.0500e-003        | 4.5300e-003        | 1.0000e-005        |               | 1.5000e-004        | 1.5000e-004        |                | 1.5000e-004        | 1.5000e-004        | 0.0000        | 0.6383        | 0.6383        | 4.0000e-005        | 0.0000        | 0.6392        |
| <b>Total</b>    | <b>0.1407</b> | <b>3.0500e-003</b> | <b>4.5300e-003</b> | <b>1.0000e-005</b> |               | <b>1.5000e-004</b> | <b>1.5000e-004</b> |                | <b>1.5000e-004</b> | <b>1.5000e-004</b> | <b>0.0000</b> | <b>0.6383</b> | <b>0.6383</b> | <b>4.0000e-005</b> | <b>0.0000</b> | <b>0.6392</b> |

**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       | 1.0000e-005        | 1.0000e-005        | 9.0000e-005        | 0.0000        | 3.0000e-005        | 0.0000        | 3.0000e-005        | 1.0000e-005        | 0.0000        | 1.0000e-005        | 0.0000        | 0.0242        | 0.0242        | 0.0000        | 0.0000        | 0.0244        |
| <b>Total</b> | <b>1.0000e-005</b> | <b>1.0000e-005</b> | <b>9.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>0.0000</b> | <b>3.0000e-005</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>1.0000e-005</b> | <b>0.0000</b> | <b>0.0242</b> | <b>0.0242</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0244</b> |

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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   | 0.0364  | 0.0488 | 0.3505 | 7.0000e-004 | 0.0719        | 6.2000e-004  | 0.0725     | 0.0192         | 5.8000e-004   | 0.0198      | 0.0000   | 64.1847   | 64.1847   | 4.0800e-003 | 3.0000e-003 | 65.1815 |
| Unmitigated | 0.0364  | 0.0488 | 0.3505 | 7.0000e-004 | 0.0719        | 6.2000e-004  | 0.0725     | 0.0192         | 5.8000e-004   | 0.0198      | 0.0000   | 64.1847   | 64.1847   | 4.0800e-003 | 3.0000e-003 | 65.1815 |

4.2 Trip Summary Information

| Land Use               | Average Daily Trip Rate |          |        | Unmitigated | Mitigated  |
|------------------------|-------------------------|----------|--------|-------------|------------|
|                        | Weekday                 | Saturday | Sunday | Annual VMT  | Annual VMT |
| General Light Industry | 19.84                   | 7.96     | 20.00  | 70,183      | 70,183     |
| Single Family Housing  | 18.88                   | 19.08    | 17.10  | 69,370      | 69,370     |
| Condo/Townhouse        | 14.64                   | 16.28    | 12.56  | 54,208      | 54,208     |
| Total                  | 53.36                   | 43.32    | 49.66  | 193,761     | 193,761    |

4.3 Trip Type Information

| Land Use               | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|------------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                        | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| General Light Industry | 14.70      | 6.60       | 6.60        | 59.00      | 28.00      | 13.00       | 92             | 5        | 3       |
| Single Family Housing  | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |
| Condo/Townhouse        | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |

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**4.4 Fleet Mix**

| Land Use               | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| General Light Industry | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |
| Single Family Housing  | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |
| Condo/Townhouse        | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

|                         | ROG         | NOx         | CO          | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total  | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------------------|-------------|-------------|-------------|-------------|---------------|--------------|-------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category                | tons/yr     |             |             |             |               |              |             |                |               |             | MT/yr    |           |           |             |             |        |
| Electricity Mitigated   |             |             |             |             |               | 0.0000       | 0.0000      |                | 0.0000        | 0.0000      | 0.0000   | 7.5892    | 7.5892    | 6.4000e-004 | 8.0000e-005 | 7.6284 |
| Electricity Unmitigated |             |             |             |             |               | 0.0000       | 0.0000      |                | 0.0000        | 0.0000      | 0.0000   | 7.5892    | 7.5892    | 6.4000e-004 | 8.0000e-005 | 7.6284 |
| Natural Gas Mitigated   | 2.5000e-004 | 2.1600e-003 | 1.2000e-003 | 1.0000e-005 |               | 1.7000e-004  | 1.7000e-004 |                | 1.7000e-004   | 1.7000e-004 | 0.0000   | 2.4588    | 2.4588    | 5.0000e-005 | 5.0000e-005 | 2.4734 |
| Natural Gas Unmitigated | 2.5000e-004 | 2.1600e-003 | 1.2000e-003 | 1.0000e-005 |               | 1.7000e-004  | 1.7000e-004 |                | 1.7000e-004   | 1.7000e-004 | 0.0000   | 2.4588    | 2.4588    | 5.0000e-005 | 5.0000e-005 | 2.4734 |

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**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         |               |               |                    |                    |               |
| Condo/Townhouse        | 9900.34        | 5.0000e-005        | 4.6000e-004        | 1.9000e-004        | 0.0000             |               | 4.0000e-005        | 4.0000e-005        |                | 4.0000e-005        | 4.0000e-005        | 0.0000        | 0.5283        | 0.5283        | 1.0000e-005        | 1.0000e-005        | 0.5315        |
| General Light Industry | 13920          | 8.0000e-005        | 6.8000e-004        | 5.7000e-004        | 0.0000             |               | 5.0000e-005        | 5.0000e-005        |                | 5.0000e-005        | 5.0000e-005        | 0.0000        | 0.7428        | 0.7428        | 1.0000e-005        | 1.0000e-005        | 0.7472        |
| Single Family Housing  | 22255.7        | 1.2000e-004        | 1.0300e-003        | 4.4000e-004        | 1.0000e-005        |               | 8.0000e-005        | 8.0000e-005        |                | 8.0000e-005        | 8.0000e-005        | 0.0000        | 1.1877        | 1.1877        | 2.0000e-005        | 2.0000e-005        | 1.1947        |
| <b>Total</b>           |                | <b>2.5000e-004</b> | <b>2.1700e-003</b> | <b>1.2000e-003</b> | <b>1.0000e-005</b> |               | <b>1.7000e-004</b> | <b>1.7000e-004</b> |                | <b>1.7000e-004</b> | <b>1.7000e-004</b> | <b>0.0000</b> | <b>2.4588</b> | <b>2.4588</b> | <b>4.0000e-005</b> | <b>4.0000e-005</b> | <b>2.4734</b> |



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**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         |               |               |                    |                    |               |
| Condo/Townhouse        | 9900.34        | 5.0000e-005        | 4.6000e-004        | 1.9000e-004        | 0.0000             |               | 4.0000e-005        | 4.0000e-005        |                | 4.0000e-005        | 4.0000e-005        | 0.0000        | 0.5283        | 0.5283        | 1.0000e-005        | 1.0000e-005        | 0.5315        |
| General Light Industry | 13920          | 8.0000e-005        | 6.8000e-004        | 5.7000e-004        | 0.0000             |               | 5.0000e-005        | 5.0000e-005        |                | 5.0000e-005        | 5.0000e-005        | 0.0000        | 0.7428        | 0.7428        | 1.0000e-005        | 1.0000e-005        | 0.7472        |
| Single Family Housing  | 22255.7        | 1.2000e-004        | 1.0300e-003        | 4.4000e-004        | 1.0000e-005        |               | 8.0000e-005        | 8.0000e-005        |                | 8.0000e-005        | 8.0000e-005        | 0.0000        | 1.1877        | 1.1877        | 2.0000e-005        | 2.0000e-005        | 1.1947        |
| <b>Total</b>           |                | <b>2.5000e-004</b> | <b>2.1700e-003</b> | <b>1.2000e-003</b> | <b>1.0000e-005</b> |               | <b>1.7000e-004</b> | <b>1.7000e-004</b> |                | <b>1.7000e-004</b> | <b>1.7000e-004</b> | <b>0.0000</b> | <b>2.4588</b> | <b>2.4588</b> | <b>4.0000e-005</b> | <b>4.0000e-005</b> | <b>2.4734</b> |

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

**5.3 Energy by Land Use - Electricity**

**Unmitigated**

|                        | Electricity Use | Total CO2     | CH4                | N2O                | CO2e          |
|------------------------|-----------------|---------------|--------------------|--------------------|---------------|
| Land Use               | kWh/yr          | MT/yr         |                    |                    |               |
| Condo/Townhouse        | 10000.4         | 1.7735        | 1.5000e-004        | 2.0000e-005        | 1.7827        |
| General Light Industry | 16880           | 2.9936        | 2.5000e-004        | 3.0000e-005        | 3.0090        |
| Single Family Housing  | 15912.8         | 2.8221        | 2.4000e-004        | 3.0000e-005        | 2.8366        |
| <b>Total</b>           |                 | <b>7.5892</b> | <b>6.4000e-004</b> | <b>8.0000e-005</b> | <b>7.6284</b> |

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

**5.3 Energy by Land Use - Electricity**

**Mitigated**

|                        | Electricity Use | Total CO2     | CH4                | N2O                | CO2e          |
|------------------------|-----------------|---------------|--------------------|--------------------|---------------|
| Land Use               | kWh/yr          | MT/yr         |                    |                    |               |
| Condo/Townhouse        | 10000.4         | 1.7735        | 1.5000e-004        | 2.0000e-005        | 1.7827        |
| General Light Industry | 16880           | 2.9936        | 2.5000e-004        | 3.0000e-005        | 3.0090        |
| Single Family Housing  | 15912.8         | 2.8221        | 2.4000e-004        | 3.0000e-005        | 2.8366        |
| <b>Total</b>           |                 | <b>7.5892</b> | <b>6.4000e-004</b> | <b>8.0000e-005</b> | <b>7.6284</b> |

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

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

|             | ROG     | NOx         | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e   |
|-------------|---------|-------------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|--------|
| Category    | tons/yr |             |        |             |               |              |            |                |               |             | MT/yr    |           |           |             |             |        |
| Mitigated   | 0.3050  | 5.2400e-003 | 0.3395 | 5.6000e-004 |               | 0.0436       | 0.0436     |                | 0.0436        | 0.0436      | 4.1318   | 1.7814    | 5.9133    | 3.8600e-003 | 3.2000e-004 | 6.1066 |
| Unmitigated | 0.3050  | 5.2400e-003 | 0.3395 | 5.6000e-004 |               | 0.0436       | 0.0436     |                | 0.0436        | 0.0436      | 4.1318   | 1.7814    | 5.9133    | 3.8600e-003 | 3.2000e-004 | 6.1066 |

**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 | 0.0140        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 0.0391        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.2510        | 4.9000e-003        | 0.3098        | 5.6000e-004        |               | 0.0434        | 0.0434        |                | 0.0434        | 0.0434        | 4.1318        | 1.7328        | 5.8647        | 3.8100e-003        | 3.2000e-004        | 6.0568        |
| Landscaping           | 8.9000e-004   | 3.4000e-004        | 0.0297        | 0.0000             |               | 1.6000e-004   | 1.6000e-004   |                | 1.6000e-004   | 1.6000e-004   | 0.0000        | 0.0486        | 0.0486        | 5.0000e-005        | 0.0000             | 0.0498        |
| <b>Total</b>          | <b>0.3050</b> | <b>5.2400e-003</b> | <b>0.3395</b> | <b>5.6000e-004</b> |               | <b>0.0436</b> | <b>0.0436</b> |                | <b>0.0436</b> | <b>0.0436</b> | <b>4.1318</b> | <b>1.7814</b> | <b>5.9133</b> | <b>3.8600e-003</b> | <b>3.2000e-004</b> | <b>6.1066</b> |

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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O                | CO2e          |
|-----------------------|---------------|--------------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|---------------|--------------------|--------------------|---------------|
| SubCategory           | tons/yr       |                    |               |                    |               |               |               |                |               |               | MT/yr         |               |               |                    |                    |               |
| Architectural Coating | 0.0140        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Consumer Products     | 0.0391        |                    |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000             | 0.0000        |
| Hearth                | 0.2510        | 4.9000e-003        | 0.3098        | 5.6000e-004        |               | 0.0434        | 0.0434        |                | 0.0434        | 0.0434        | 4.1318        | 1.7328        | 5.8647        | 3.8100e-003        | 3.2000e-004        | 6.0568        |
| Landscaping           | 8.9000e-004   | 3.4000e-004        | 0.0297        | 0.0000             |               | 1.6000e-004   | 1.6000e-004   |                | 1.6000e-004   | 1.6000e-004   | 0.0000        | 0.0486        | 0.0486        | 5.0000e-005        | 0.0000             | 0.0498        |
| <b>Total</b>          | <b>0.3050</b> | <b>5.2400e-003</b> | <b>0.3395</b> | <b>5.6000e-004</b> |               | <b>0.0436</b> | <b>0.0436</b> |                | <b>0.0436</b> | <b>0.0436</b> | <b>4.1318</b> | <b>1.7814</b> | <b>5.9133</b> | <b>3.8600e-003</b> | <b>3.2000e-004</b> | <b>6.1066</b> |

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

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

|             | Total CO2 | CH4    | N2O         | CO2e   |
|-------------|-----------|--------|-------------|--------|
| Category    | MT/yr     |        |             |        |
| Mitigated   | 1.6832    | 0.0387 | 9.3000e-004 | 2.9277 |
| Unmitigated | 1.6832    | 0.0387 | 9.3000e-004 | 2.9277 |

**7.2 Water by Land Use**

**Unmitigated**

|                        | Indoor/Outdoor Use   | Total CO2     | CH4           | N2O                | CO2e          |
|------------------------|----------------------|---------------|---------------|--------------------|---------------|
| Land Use               | Mgal                 | MT/yr         |               |                    |               |
| Condo/Townhouse        | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| General Light Industry | 0.925 / 0.108542     | 1.2485        | 0.0302        | 7.2000e-004        | 2.2190        |
| Single Family Housing  | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| <b>Total</b>           |                      | <b>1.6832</b> | <b>0.0387</b> | <b>9.2000e-004</b> | <b>2.9277</b> |

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

**7.2 Water by Land Use**

**Mitigated**

|                        | Indoor/Outdoor Use   | Total CO2     | CH4           | N2O                | CO2e          |
|------------------------|----------------------|---------------|---------------|--------------------|---------------|
| Land Use               | Mgal                 | MT/yr         |               |                    |               |
| Condo/Townhouse        | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| General Light Industry | 0.925 / 0.108542     | 1.2485        | 0.0302        | 7.2000e-004        | 2.2190        |
| Single Family Housing  | 0.130308 / 0.0821507 | 0.2174        | 4.2600e-003   | 1.0000e-004        | 0.3543        |
| <b>Total</b>           |                      | <b>1.6832</b> | <b>0.0387</b> | <b>9.2000e-004</b> | <b>2.9277</b> |

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

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

**Category/Year**

|             | Total CO2 | CH4    | N2O    | CO2e   |
|-------------|-----------|--------|--------|--------|
|             | MT/yr     |        |        |        |
| Mitigated   | 1.4981    | 0.0885 | 0.0000 | 3.7114 |
| Unmitigated | 1.4981    | 0.0885 | 0.0000 | 3.7114 |

**8.2 Waste by Land Use**

**Unmitigated**

|                        | Waste Disposed | Total CO2     | CH4           | N2O           | CO2e          |
|------------------------|----------------|---------------|---------------|---------------|---------------|
| Land Use               | tons           | MT/yr         |               |               |               |
| Condo/Townhouse        | 0.92           | 0.1868        | 0.0110        | 0.0000        | 0.4627        |
| General Light Industry | 4.96           | 1.0068        | 0.0595        | 0.0000        | 2.4944        |
| Single Family Housing  | 1.5            | 0.3045        | 0.0180        | 0.0000        | 0.7544        |
| <b>Total</b>           |                | <b>1.4981</b> | <b>0.0885</b> | <b>0.0000</b> | <b>3.7114</b> |



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

**8.2 Waste by Land Use**

**Mitigated**

|                        | Waste Disposed | Total CO2     | CH4           | N2O           | CO2e          |
|------------------------|----------------|---------------|---------------|---------------|---------------|
| Land Use               | tons           | MT/yr         |               |               |               |
| Condo/Townhouse        | 0.92           | 0.1868        | 0.0110        | 0.0000        | 0.4627        |
| General Light Industry | 4.96           | 1.0068        | 0.0595        | 0.0000        | 2.4944        |
| Single Family Housing  | 1.5            | 0.3045        | 0.0180        | 0.0000        | 0.7544        |
| <b>Total</b>           |                | <b>1.4981</b> | <b>0.0885</b> | <b>0.0000</b> | <b>3.7114</b> |

**9.0 Operational Offroad**

| Equipment Type      | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|-----------|-------------|-------------|-----------|
| Off-Highway Trucks  | 1      | 2.00      | 260       | 402         | 0.38        | Diesel    |
| Rubber Tired Dozers | 1      | 2.00      | 260       | 247         | 0.40        | Diesel    |

Apogee-Livestock - Great Basin UAPCD Air District, Annual

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

**UnMitigated/Mitigated**

|                     | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2      | Total CO2      | CH4           | N2O           | CO2e           |
|---------------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|----------------|----------------|---------------|---------------|----------------|
| Equipment Type      | tons/yr       |               |               |                    |               |               |               |                |               |               | MT/yr         |                |                |               |               |                |
| Off-Highway Trucks  | 0.0155        | 0.0932        | 0.1035        | 4.3000e-004        |               | 3.3300e-003   | 3.3300e-003   |                | 3.0600e-003   | 3.0600e-003   | 0.0000        | 37.7293        | 37.7293        | 0.0122        | 0.0000        | 38.0343        |
| Rubber Tired Dozers | 0.0211        | 0.2155        | 0.0974        | 2.8000e-004        |               | 9.4300e-003   | 9.4300e-003   |                | 8.6800e-003   | 8.6800e-003   | 0.0000        | 24.3817        | 24.3817        | 7.8900e-003   | 0.0000        | 24.5788        |
| <b>Total</b>        | <b>0.0366</b> | <b>0.3087</b> | <b>0.2010</b> | <b>7.1000e-004</b> |               | <b>0.0128</b> | <b>0.0128</b> |                | <b>0.0117</b> | <b>0.0117</b> | <b>0.0000</b> | <b>62.1109</b> | <b>62.1109</b> | <b>0.0201</b> | <b>0.0000</b> | <b>62.6131</b> |

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

| Equipment Type      | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|------------|-------------|-------------|-----------|
| Emergency Generator | 1      | 0         | 50         | 202         | 0.73        | CNG       |

**Boilers**

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

Apogee-Livestock - Great Basin UAPCD Air District, Annual

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

**10.1 Stationary Sources**

**Unmitigated/Mitigated**

|  | ROG           | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total         | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2      | NBio- CO2     | Total CO2     | CH4                | N2O           | CO2e          |
|--|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|----------------|--------------------|--------------------|---------------|---------------|---------------|--------------------|---------------|---------------|
| Equipment Type                         | tons/yr       |                    |               |                    |               |                    |                    |                |                    |                    | MT/yr         |               |               |                    |               |               |
| Emergency Generator - CNG (0 - 500 HP) | 0.0444        | 4.2800e-003        | 0.1157        | 2.0000e-005        |               | 2.5000e-004        | 2.5000e-004        |                | 2.5000e-004        | 2.5000e-004        | 0.0000        | 2.5752        | 2.5752        | 5.3800e-003        | 0.0000        | 2.7098        |
| <b>Total</b>                           | <b>0.0444</b> | <b>4.2800e-003</b> | <b>0.1157</b> | <b>2.0000e-005</b> |               | <b>2.5000e-004</b> | <b>2.5000e-004</b> |                | <b>2.5000e-004</b> | <b>2.5000e-004</b> | <b>0.0000</b> | <b>2.5752</b> | <b>2.5752</b> | <b>5.3800e-003</b> | <b>0.0000</b> | <b>2.7098</b> |

**11.0 Vegetation**

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Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**Apogee-Livestock  
Great Basin UAPCD Air District, Summer**

**1.0 Project Characteristics**

**1.1 Land Usage**

| Land Uses              | Size | Metric        | Lot Acreage | Floor Surface Area | Population |
|------------------------|------|---------------|-------------|--------------------|------------|
| General Light Industry | 4.00 | 1000sqft      | 0.09        | 4,000.00           | 0          |
| Single Family Housing  | 2.00 | Dwelling Unit | 0.65        | 4,000.00           | 6          |
| Condo/Townhouse        | 2.00 | Dwelling Unit | 0.13        | 2,000.00           | 6          |

**1.2 Other Project Characteristics**

|                                |                            |                                |       |                                  |       |
|--------------------------------|----------------------------|--------------------------------|-------|----------------------------------|-------|
| <b>Urbanization</b>            | Rural                      | <b>Wind Speed (m/s)</b>        | 2.2   | <b>Precipitation Freq (Days)</b> | 54    |
| <b>Climate Zone</b>            | 1                          | <b>Operational Year</b>        | 2025  |                                  |       |
| <b>Utility Company</b>         | Southern California Edison |                                |       |                                  |       |
| <b>CO2 Intensity (lb/MWhr)</b> | 390.98                     | <b>CH4 Intensity (lb/MWhr)</b> | 0.033 | <b>N2O Intensity (lb/MWhr)</b>   | 0.004 |

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

Project Characteristics -

Land Use - General Light Industry - Livestock Barn; Single Family Housing - Single Family Dwelling Units; Condo - Accessory Dwelling Units

Demolition -

Trips and VMT - Building construction materials hauling trip - 1 trip per 150 square feet of construction.

Water And Wastewater - General light industry = water use for 39 cattles \* 30.5 gals/day each.

Operational Off-Road Equipment - Off-road equipment = typical equipment needed to feed livestock.

Stationary Sources - Emergency Generators and Fire Pumps - 50 hours/year is required for back-up generator maintenance.

Construction Off-road Equipment Mitigation -

## Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

| Table Name                      | Column Name                | Default Value | New Value  |
|---------------------------------|----------------------------|---------------|------------|
| tblLandUse                      | LandUseSquareFeet          | 3,600.00      | 4,000.00   |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 2.00       |
| tblOperationalOffRoadEquipment  | OperHoursPerDay            | 8.00          | 2.00       |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00       |
| tblOperationalOffRoadEquipment  | OperOffRoadEquipmentNumber | 0.00          | 1.00       |
| tblProjectCharacteristics       | UrbanizationLevel          | Urban         | Rural      |
| tblStationaryGeneratorsPumpsUse | HorsePowerValue            | 0.00          | 202.00     |
| tblStationaryGeneratorsPumpsUse | HoursPerYear               | 0.00          | 50.00      |
| tblStationaryGeneratorsPumpsUse | NumberOfEquipment          | 0.00          | 1.00       |
| tblTripsAndVMT                  | HaulingTripNumber          | 2.00          | 49.00      |
| tblTripsAndVMT                  | HaulingTripNumber          | 0.00          | 67.00      |
| tblWater                        | OutdoorWaterUseRate        | 0.00          | 108,542.00 |

**2.0 Emissions Summary**

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Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**2.2 Overall Operational**

**Unmitigated Operational**

|              | ROG           | NOx           | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2        | NBio- CO2         | Total CO2         | CH4           | N2O           | CO2e              |
|--------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|-----------------|-------------------|-------------------|---------------|---------------|-------------------|
| Category     | lb/day        |               |                |               |               |               |               |                |               |               | lb/day          |                   |                   |               |               |                   |
| Area         | 6.4223        | 0.1234        | 7.8865         | 0.0137        |               | 1.0613        | 1.0613        |                | 1.0613        | 1.0613        | 111.0869        | 47.1833           | 158.2702          | 0.1031        | 8.7400e-003   | 163.4513          |
| Energy       | 1.3600e-003   | 0.0119        | 6.6000e-003    | 7.0000e-005   |               | 9.4000e-004   | 9.4000e-004   |                | 9.4000e-004   | 9.4000e-004   |                 | 14.8513           | 14.8513           | 2.8000e-004   | 2.7000e-004   | 14.9395           |
| Mobile       | 0.2247        | 0.2632        | 1.9790         | 4.2500e-003   | 0.4397        | 3.6600e-003   | 0.4434        | 0.1171         | 3.4300e-003   | 0.1206        |                 | 432.1627          | 432.1627          | 0.0247        | 0.0184        | 438.2576          |
| Offroad      | 0.2814        | 2.3743        | 1.5458         | 5.4400e-003   |               | 0.0981        | 0.0981        |                | 0.0903        | 0.0903        | 0.0000          | 526.6589          | 526.6589          | 0.1703        |               | 530.9172          |
| Stationary   | 0.0000        | 0.0000        | 0.0000         | 0.0000        |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 | 0.0000            | 0.0000            | 0.0000        |               | 0.0000            |
| <b>Total</b> | <b>6.9298</b> | <b>2.7727</b> | <b>11.4179</b> | <b>0.0235</b> | <b>0.4397</b> | <b>1.1641</b> | <b>1.6037</b> | <b>0.1171</b>  | <b>1.1560</b> | <b>1.2731</b> | <b>111.0869</b> | <b>1,020.8561</b> | <b>1,131.9430</b> | <b>0.2984</b> | <b>0.0274</b> | <b>1,147.5656</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**2.2 Overall Operational**

**Mitigated Operational**

|              | ROG           | NOx           | CO             | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2        | NBio- CO2         | Total CO2         | CH4           | N2O           | CO2e              |
|--------------|---------------|---------------|----------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|-----------------|-------------------|-------------------|---------------|---------------|-------------------|
| Category     | lb/day        |               |                |               |               |               |               |                |               |               | lb/day          |                   |                   |               |               |                   |
| Area         | 6.4223        | 0.1234        | 7.8865         | 0.0137        |               | 1.0613        | 1.0613        |                | 1.0613        | 1.0613        | 111.0869        | 47.1833           | 158.2702          | 0.1031        | 8.7400e-003   | 163.4513          |
| Energy       | 1.3600e-003   | 0.0119        | 6.6000e-003    | 7.0000e-005   |               | 9.4000e-004   | 9.4000e-004   |                | 9.4000e-004   | 9.4000e-004   |                 | 14.8513           | 14.8513           | 2.8000e-004   | 2.7000e-004   | 14.9395           |
| Mobile       | 0.2247        | 0.2632        | 1.9790         | 4.2500e-003   | 0.4397        | 3.6600e-003   | 0.4434        | 0.1171         | 3.4300e-003   | 0.1206        |                 | 432.1627          | 432.1627          | 0.0247        | 0.0184        | 438.2576          |
| Offroad      | 0.2814        | 2.3743        | 1.5458         | 5.4400e-003   |               | 0.0981        | 0.0981        |                | 0.0903        | 0.0903        | 0.0000          | 526.6589          | 526.6589          | 0.1703        |               | 530.9172          |
| Stationary   | 0.0000        | 0.0000        | 0.0000         | 0.0000        |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 | 0.0000            | 0.0000            | 0.0000        |               | 0.0000            |
| <b>Total</b> | <b>6.9298</b> | <b>2.7727</b> | <b>11.4179</b> | <b>0.0235</b> | <b>0.4397</b> | <b>1.1641</b> | <b>1.6037</b> | <b>0.1171</b>  | <b>1.1560</b> | <b>1.2731</b> | <b>111.0869</b> | <b>1,020.8561</b> | <b>1,131.9430</b> | <b>0.2984</b> | <b>0.0274</b> | <b>1,147.5656</b> |

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

**3.0 Construction Detail**

**Construction Phase**

| Phase Number | Phase Name       | Phase Type       | Start Date | End Date  | Num Days Week | Num Days | Phase Description |
|--------------|------------------|------------------|------------|-----------|---------------|----------|-------------------|
| 1            | Demolition       | Demolition       | 1/2/2024   | 1/15/2024 | 5             | 10       |                   |
| 2            | Site Preparation | Site Preparation | 1/16/2024  | 1/16/2024 | 5             | 1        |                   |
| 3            | Grading          | Grading          | 1/17/2024  | 1/18/2024 | 5             | 2        |                   |



Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

|   |                       |                       |           |           |   |     |
|---|-----------------------|-----------------------|-----------|-----------|---|-----|
| 4 | Building Construction | Building Construction | 1/19/2024 | 6/6/2024  | 5 | 100 |
| 5 | Paving                | Paving                | 6/7/2024  | 6/13/2024 | 5 | 5   |
| 6 | Architectural Coating | Architectural Coating | 6/14/2024 | 6/20/2024 | 5 | 5   |

**Acres of Grading (Site Preparation Phase): 0.5**

**Acres of Grading (Grading Phase): 1.5**

**Acres of Paving: 0**

**Residential Indoor: 12,150; Residential Outdoor: 4,050; Non-Residential Indoor: 6,000; Non-Residential Outdoor: 2,000; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

| Phase Name            | Offroad Equipment Type    | Amount | Usage Hours | Horse Power | Load Factor |
|-----------------------|---------------------------|--------|-------------|-------------|-------------|
| Architectural Coating | Air Compressors           | 1      | 6.00        | 78          | 0.48        |
| Paving                | Cement and Mortar Mixers  | 4      | 6.00        | 9           | 0.56        |
| Demolition            | Concrete/Industrial Saws  | 1      | 8.00        | 81          | 0.73        |
| Building Construction | Cranes                    | 1      | 4.00        | 231         | 0.29        |
| Building Construction | Forklifts                 | 2      | 6.00        | 89          | 0.20        |
| Grading               | Graders                   | 1      | 6.00        | 187         | 0.41        |
| Site Preparation      | Graders                   | 1      | 8.00        | 187         | 0.41        |
| Paving                | Pavers                    | 1      | 7.00        | 130         | 0.42        |
| Paving                | Rollers                   | 1      | 7.00        | 80          | 0.38        |
| Demolition            | Rubber Tired Dozers       | 1      | 1.00        | 247         | 0.40        |
| Grading               | Rubber Tired Dozers       | 1      | 6.00        | 247         | 0.40        |
| Building Construction | Tractors/Loaders/Backhoes | 2      | 8.00        | 97          | 0.37        |
| Demolition            | Tractors/Loaders/Backhoes | 2      | 6.00        | 97          | 0.37        |
| Grading               | Tractors/Loaders/Backhoes | 1      | 7.00        | 97          | 0.37        |
| Paving                | Tractors/Loaders/Backhoes | 1      | 7.00        | 97          | 0.37        |
| Site Preparation      | Tractors/Loaders/Backhoes | 1      | 8.00        | 97          | 0.37        |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**Trips and VMT**

| Phase Name            | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|-----------------------|-------------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|----------------------|----------------------|-----------------------|
| Demolition            | 4                       | 10.00              | 0.00               | 49.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Site Preparation      | 2                       | 5.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Grading               | 3                       | 8.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Building Construction | 5                       | 4.00               | 1.00               | 67.00               | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Paving                | 7                       | 18.00              | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |
| Architectural Coating | 1                       | 1.00               | 0.00               | 0.00                | 16.80              | 6.60               | 20.00               | LD_Mix               | HDT_Mix              | HHDT                  |

**3.1 Mitigation Measures Construction**

Water Exposed Area

**3.2 Demolition - 2024**

**Unmitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |               |               |               |               |               |               |                    |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |               |               |               | 0.0507        | 0.0000        | 0.0507        | 7.6800e-003        | 0.0000        | 7.6800e-003   |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 0.6156        | 5.4776        | 7.3949        | 0.0120        |               | 0.2504        | 0.2504        |                    | 0.2392        | 0.2392        |          | 1,148.6874        | 1,148.6874        | 0.2080        |     | 1,153.8870        |
| <b>Total</b>  | <b>0.6156</b> | <b>5.4776</b> | <b>7.3949</b> | <b>0.0120</b> | <b>0.0507</b> | <b>0.2504</b> | <b>0.3011</b> | <b>7.6800e-003</b> | <b>0.2392</b> | <b>0.2469</b> |          | <b>1,148.6874</b> | <b>1,148.6874</b> | <b>0.2080</b> |     | <b>1,153.8870</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.2 Demolition - 2024**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 0.0138        | 0.6374        | 0.1604        | 2.8000e-003        | 0.0860        | 6.5000e-003        | 0.0925        | 0.0236         | 6.2200e-003        | 0.0298        |          | 296.2903        | 296.2903        | 6.5000e-004        | 0.0466        | 310.1817        |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000        | 0.0000          |
| Worker       | 0.0510        | 0.0271        | 0.3729        | 1.1000e-003        | 0.1277        | 6.6000e-004        | 0.1284        | 0.0339         | 6.0000e-004        | 0.0345        |          | 111.2143        | 111.2143        | 2.6600e-003        | 2.6700e-003   | 112.0753        |
| <b>Total</b> | <b>0.0648</b> | <b>0.6645</b> | <b>0.5332</b> | <b>3.9000e-003</b> | <b>0.2137</b> | <b>7.1600e-003</b> | <b>0.2208</b> | <b>0.0575</b>  | <b>6.8200e-003</b> | <b>0.0643</b> |          | <b>407.5046</b> | <b>407.5046</b> | <b>3.3100e-003</b> | <b>0.0492</b> | <b>422.2570</b> |

**Mitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |               |               |               |               |               |               |                    |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |               |               |               | 0.0228        | 0.0000        | 0.0228        | 3.4500e-003        | 0.0000        | 3.4500e-003   |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 0.6156        | 5.4776        | 7.3949        | 0.0120        |               | 0.2504        | 0.2504        |                    | 0.2392        | 0.2392        | 0.0000        | 1,148.6874        | 1,148.6874        | 0.2080        |     | 1,153.8870        |
| <b>Total</b>  | <b>0.6156</b> | <b>5.4776</b> | <b>7.3949</b> | <b>0.0120</b> | <b>0.0228</b> | <b>0.2504</b> | <b>0.2732</b> | <b>3.4500e-003</b> | <b>0.2392</b> | <b>0.2427</b> | <b>0.0000</b> | <b>1,148.6874</b> | <b>1,148.6874</b> | <b>0.2080</b> |     | <b>1,153.8870</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.2 Demolition - 2024**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 0.0138        | 0.6374        | 0.1604        | 2.8000e-003        | 0.0860        | 6.5000e-003        | 0.0925        | 0.0236         | 6.2200e-003        | 0.0298        |          | 296.2903        | 296.2903        | 6.5000e-004        | 0.0466        | 310.1817        |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000        | 0.0000          |
| Worker       | 0.0510        | 0.0271        | 0.3729        | 1.1000e-003        | 0.1277        | 6.6000e-004        | 0.1284        | 0.0339         | 6.0000e-004        | 0.0345        |          | 111.2143        | 111.2143        | 2.6600e-003        | 2.6700e-003   | 112.0753        |
| <b>Total</b> | <b>0.0648</b> | <b>0.6645</b> | <b>0.5332</b> | <b>3.9000e-003</b> | <b>0.2137</b> | <b>7.1600e-003</b> | <b>0.2208</b> | <b>0.0575</b>  | <b>6.8200e-003</b> | <b>0.0643</b> |          | <b>407.5046</b> | <b>407.5046</b> | <b>3.3100e-003</b> | <b>0.0492</b> | <b>422.2570</b> |

**3.3 Site Preparation - 2024**

**Unmitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-----------------|-----------------|---------------|-----|-----------------|
| Category      | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day   |                 |                 |               |     |                 |
| Fugitive Dust |               |               |               |                    | 0.5303        | 0.0000        | 0.5303        | 0.0573         | 0.0000        | 0.0573        |          |                 | 0.0000          |               |     | 0.0000          |
| Off-Road      | 0.4985        | 5.6040        | 3.8921        | 9.7300e-003        |               | 0.2012        | 0.2012        |                | 0.1851        | 0.1851        |          | 942.2742        | 942.2742        | 0.3048        |     | 949.8930        |
| <b>Total</b>  | <b>0.4985</b> | <b>5.6040</b> | <b>3.8921</b> | <b>9.7300e-003</b> | <b>0.5303</b> | <b>0.2012</b> | <b>0.7315</b> | <b>0.0573</b>  | <b>0.1851</b> | <b>0.2424</b> |          | <b>942.2742</b> | <b>942.2742</b> | <b>0.3048</b> |     | <b>949.8930</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.3 Site Preparation - 2024**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0255        | 0.0136        | 0.1864        | 5.5000e-004        | 0.0639        | 3.3000e-004        | 0.0642        | 0.0169         | 3.0000e-004        | 0.0172        |          | 55.6072        | 55.6072        | 1.3300e-003        | 1.3300e-003        | 56.0377        |
| <b>Total</b> | <b>0.0255</b> | <b>0.0136</b> | <b>0.1864</b> | <b>5.5000e-004</b> | <b>0.0639</b> | <b>3.3000e-004</b> | <b>0.0642</b> | <b>0.0169</b>  | <b>3.0000e-004</b> | <b>0.0172</b> |          | <b>55.6072</b> | <b>55.6072</b> | <b>1.3300e-003</b> | <b>1.3300e-003</b> | <b>56.0377</b> |

**Mitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|---------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|-----|-----------------|
| Category      | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day        |                 |                 |               |     |                 |
| Fugitive Dust |               |               |               |                    | 0.2386        | 0.0000        | 0.2386        | 0.0258         | 0.0000        | 0.0258        |               |                 | 0.0000          |               |     | 0.0000          |
| Off-Road      | 0.4985        | 5.6040        | 3.8921        | 9.7300e-003        |               | 0.2012        | 0.2012        |                | 0.1851        | 0.1851        | 0.0000        | 942.2742        | 942.2742        | 0.3048        |     | 949.8930        |
| <b>Total</b>  | <b>0.4985</b> | <b>5.6040</b> | <b>3.8921</b> | <b>9.7300e-003</b> | <b>0.2386</b> | <b>0.2012</b> | <b>0.4398</b> | <b>0.0258</b>  | <b>0.1851</b> | <b>0.2109</b> | <b>0.0000</b> | <b>942.2742</b> | <b>942.2742</b> | <b>0.3048</b> |     | <b>949.8930</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.3 Site Preparation - 2024**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0255        | 0.0136        | 0.1864        | 5.5000e-004        | 0.0639        | 3.3000e-004        | 0.0642        | 0.0169         | 3.0000e-004        | 0.0172        |          | 55.6072        | 55.6072        | 1.3300e-003        | 1.3300e-003        | 56.0377        |
| <b>Total</b> | <b>0.0255</b> | <b>0.0136</b> | <b>0.1864</b> | <b>5.5000e-004</b> | <b>0.0639</b> | <b>3.3000e-004</b> | <b>0.0642</b> | <b>0.0169</b>  | <b>3.0000e-004</b> | <b>0.0172</b> |          | <b>55.6072</b> | <b>55.6072</b> | <b>1.3300e-003</b> | <b>1.3300e-003</b> | <b>56.0377</b> |

**3.4 Grading - 2024**

**Unmitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Fugitive Dust |               |               |               |               | 5.3119        | 0.0000        | 5.3119        | 2.5686         | 0.0000        | 2.5686        |          |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 0.9132        | 9.7297        | 5.5468        | 0.0141        |               | 0.4001        | 0.4001        |                | 0.3681        | 0.3681        |          | 1,364.6623        | 1,364.6623        | 0.4414        |     | 1,375.6962        |
| <b>Total</b>  | <b>0.9132</b> | <b>9.7297</b> | <b>5.5468</b> | <b>0.0141</b> | <b>5.3119</b> | <b>0.4001</b> | <b>5.7120</b> | <b>2.5686</b>  | <b>0.3681</b> | <b>2.9367</b> |          | <b>1,364.6623</b> | <b>1,364.6623</b> | <b>0.4414</b> |     | <b>1,375.6962</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.4 Grading - 2024**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0408        | 0.0217        | 0.2983        | 8.8000e-004        | 0.1022        | 5.2000e-004        | 0.1027        | 0.0271         | 4.8000e-004        | 0.0276        |          | 88.9715        | 88.9715        | 2.1300e-003        | 2.1300e-003        | 89.6603        |
| <b>Total</b> | <b>0.0408</b> | <b>0.0217</b> | <b>0.2983</b> | <b>8.8000e-004</b> | <b>0.1022</b> | <b>5.2000e-004</b> | <b>0.1027</b> | <b>0.0271</b>  | <b>4.8000e-004</b> | <b>0.0276</b> |          | <b>88.9715</b> | <b>88.9715</b> | <b>2.1300e-003</b> | <b>2.1300e-003</b> | <b>89.6603</b> |

**Mitigated Construction On-Site**

|               | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category      | lb/day        |               |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Fugitive Dust |               |               |               |               | 2.3904        | 0.0000        | 2.3904        | 1.1559         | 0.0000        | 1.1559        |               |                   | 0.0000            |               |     | 0.0000            |
| Off-Road      | 0.9132        | 9.7297        | 5.5468        | 0.0141        |               | 0.4001        | 0.4001        |                | 0.3681        | 0.3681        | 0.0000        | 1,364.6623        | 1,364.6623        | 0.4414        |     | 1,375.6962        |
| <b>Total</b>  | <b>0.9132</b> | <b>9.7297</b> | <b>5.5468</b> | <b>0.0141</b> | <b>2.3904</b> | <b>0.4001</b> | <b>2.7905</b> | <b>1.1559</b>  | <b>0.3681</b> | <b>1.5240</b> | <b>0.0000</b> | <b>1,364.6623</b> | <b>1,364.6623</b> | <b>0.4414</b> |     | <b>1,375.6962</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.4 Grading - 2024**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 0.0408        | 0.0217        | 0.2983        | 8.8000e-004        | 0.1022        | 5.2000e-004        | 0.1027        | 0.0271         | 4.8000e-004        | 0.0276        |          | 88.9715        | 88.9715        | 2.1300e-003        | 2.1300e-003        | 89.6603        |
| <b>Total</b> | <b>0.0408</b> | <b>0.0217</b> | <b>0.2983</b> | <b>8.8000e-004</b> | <b>0.1022</b> | <b>5.2000e-004</b> | <b>0.1027</b> | <b>0.0271</b>  | <b>4.8000e-004</b> | <b>0.0276</b> |          | <b>88.9715</b> | <b>88.9715</b> | <b>2.1300e-003</b> | <b>2.1300e-003</b> | <b>89.6603</b> |

**3.5 Building Construction - 2024**

**Unmitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Off-Road     | 0.5950        | 5.9739        | 7.0675        | 0.0114        |               | 0.2824        | 0.2824        |                | 0.2598        | 0.2598        |          | 1,104.9834        | 1,104.9834        | 0.3574        |     | 1,113.9177        |
| <b>Total</b> | <b>0.5950</b> | <b>5.9739</b> | <b>7.0675</b> | <b>0.0114</b> |               | <b>0.2824</b> | <b>0.2824</b> |                | <b>0.2598</b> | <b>0.2598</b> |          | <b>1,104.9834</b> | <b>1,104.9834</b> | <b>0.3574</b> |     | <b>1,113.9177</b> |



Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.5 Building Construction - 2024**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 1.8900e-003   | 0.0872        | 0.0219        | 3.8000e-004        | 0.0118        | 8.9000e-004        | 0.0126        | 3.2200e-003    | 8.5000e-004        | 4.0700e-003   |          | 40.5132         | 40.5132         | 9.0000e-005        | 6.3700e-003   | 42.4126         |
| Vendor       | 2.3300e-003   | 0.0424        | 0.0205        | 2.0000e-004        | 6.1300e-003   | 2.9000e-004        | 6.4300e-003   | 1.7700e-003    | 2.8000e-004        | 2.0500e-003   |          | 20.4848         | 20.4848         | 1.1000e-004        | 2.6400e-003   | 21.2747         |
| Worker       | 0.0204        | 0.0109        | 0.1491        | 4.4000e-004        | 0.0511        | 2.6000e-004        | 0.0514        | 0.0136         | 2.4000e-004        | 0.0138        |          | 44.4857         | 44.4857         | 1.0600e-003        | 1.0700e-003   | 44.8301         |
| <b>Total</b> | <b>0.0246</b> | <b>0.1404</b> | <b>0.1916</b> | <b>1.0200e-003</b> | <b>0.0690</b> | <b>1.4400e-003</b> | <b>0.0704</b> | <b>0.0185</b>  | <b>1.3700e-003</b> | <b>0.0199</b> |          | <b>105.4837</b> | <b>105.4837</b> | <b>1.2600e-003</b> | <b>0.0101</b> | <b>108.5174</b> |

**Mitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Off-Road     | 0.5950        | 5.9739        | 7.0675        | 0.0114        |               | 0.2824        | 0.2824        |                | 0.2598        | 0.2598        | 0.0000        | 1,104.9834        | 1,104.9834        | 0.3574        |     | 1,113.9177        |
| <b>Total</b> | <b>0.5950</b> | <b>5.9739</b> | <b>7.0675</b> | <b>0.0114</b> |               | <b>0.2824</b> | <b>0.2824</b> |                | <b>0.2598</b> | <b>0.2598</b> | <b>0.0000</b> | <b>1,104.9834</b> | <b>1,104.9834</b> | <b>0.3574</b> |     | <b>1,113.9177</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.5 Building Construction - 2024**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O           | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|---------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |               |                 |
| Hauling      | 1.8900e-003   | 0.0872        | 0.0219        | 3.8000e-004        | 0.0118        | 8.9000e-004        | 0.0126        | 3.2200e-003    | 8.5000e-004        | 4.0700e-003   |          | 40.5132         | 40.5132         | 9.0000e-005        | 6.3700e-003   | 42.4126         |
| Vendor       | 2.3300e-003   | 0.0424        | 0.0205        | 2.0000e-004        | 6.1300e-003   | 2.9000e-004        | 6.4300e-003   | 1.7700e-003    | 2.8000e-004        | 2.0500e-003   |          | 20.4848         | 20.4848         | 1.1000e-004        | 2.6400e-003   | 21.2747         |
| Worker       | 0.0204        | 0.0109        | 0.1491        | 4.4000e-004        | 0.0511        | 2.6000e-004        | 0.0514        | 0.0136         | 2.4000e-004        | 0.0138        |          | 44.4857         | 44.4857         | 1.0600e-003        | 1.0700e-003   | 44.8301         |
| <b>Total</b> | <b>0.0246</b> | <b>0.1404</b> | <b>0.1916</b> | <b>1.0200e-003</b> | <b>0.0690</b> | <b>1.4400e-003</b> | <b>0.0704</b> | <b>0.0185</b>  | <b>1.3700e-003</b> | <b>0.0199</b> |          | <b>105.4837</b> | <b>105.4837</b> | <b>1.2600e-003</b> | <b>0.0101</b> | <b>108.5174</b> |

**3.6 Paving - 2024**

**Unmitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |                   |                   |               |     |                   |
| Off-Road     | 0.5904        | 5.2297        | 7.0314        | 0.0113        |               | 0.2429        | 0.2429        |                | 0.2269        | 0.2269        |          | 1,036.2393        | 1,036.2393        | 0.3019        |     | 1,043.7858        |
| Paving       | 0.0000        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          |                   | 0.0000            |               |     | 0.0000            |
| <b>Total</b> | <b>0.5904</b> | <b>5.2297</b> | <b>7.0314</b> | <b>0.0113</b> |               | <b>0.2429</b> | <b>0.2429</b> |                | <b>0.2269</b> | <b>0.2269</b> |          | <b>1,036.2393</b> | <b>1,036.2393</b> | <b>0.3019</b> |     | <b>1,043.7858</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.6 Paving - 2024**

**Unmitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0918        | 0.0489        | 0.6711        | 1.9800e-003        | 0.2299        | 1.1800e-003        | 0.2311        | 0.0610         | 1.0900e-003        | 0.0621        |          | 200.1858        | 200.1858        | 4.7900e-003        | 4.8000e-003        | 201.7356        |
| <b>Total</b> | <b>0.0918</b> | <b>0.0489</b> | <b>0.6711</b> | <b>1.9800e-003</b> | <b>0.2299</b> | <b>1.1800e-003</b> | <b>0.2311</b> | <b>0.0610</b>  | <b>1.0900e-003</b> | <b>0.0621</b> |          | <b>200.1858</b> | <b>200.1858</b> | <b>4.7900e-003</b> | <b>4.8000e-003</b> | <b>201.7356</b> |

**Mitigated Construction On-Site**

|              | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2         | Total CO2         | CH4           | N2O | CO2e              |
|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-------------------|-------------------|---------------|-----|-------------------|
| Category     | lb/day        |               |               |               |               |               |               |                |               |               | lb/day        |                   |                   |               |     |                   |
| Off-Road     | 0.5904        | 5.2297        | 7.0314        | 0.0113        |               | 0.2429        | 0.2429        |                | 0.2269        | 0.2269        | 0.0000        | 1,036.2393        | 1,036.2393        | 0.3019        |     | 1,043.7858        |
| Paving       | 0.0000        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |               |                   | 0.0000            |               |     | 0.0000            |
| <b>Total</b> | <b>0.5904</b> | <b>5.2297</b> | <b>7.0314</b> | <b>0.0113</b> |               | <b>0.2429</b> | <b>0.2429</b> |                | <b>0.2269</b> | <b>0.2269</b> | <b>0.0000</b> | <b>1,036.2393</b> | <b>1,036.2393</b> | <b>0.3019</b> |     | <b>1,043.7858</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.6 Paving - 2024**

**Mitigated Construction Off-Site**

|              | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5      | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4                | N2O                | CO2e            |
|--------------|---------------|---------------|---------------|--------------------|---------------|--------------------|---------------|----------------|--------------------|---------------|----------|-----------------|-----------------|--------------------|--------------------|-----------------|
| Category     | lb/day        |               |               |                    |               |                    |               |                |                    |               | lb/day   |                 |                 |                    |                    |                 |
| 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          |
| Vendor       | 0.0000        | 0.0000        | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000         | 0.0000             | 0.0000        |          | 0.0000          | 0.0000          | 0.0000             | 0.0000             | 0.0000          |
| Worker       | 0.0918        | 0.0489        | 0.6711        | 1.9800e-003        | 0.2299        | 1.1800e-003        | 0.2311        | 0.0610         | 1.0900e-003        | 0.0621        |          | 200.1858        | 200.1858        | 4.7900e-003        | 4.8000e-003        | 201.7356        |
| <b>Total</b> | <b>0.0918</b> | <b>0.0489</b> | <b>0.6711</b> | <b>1.9800e-003</b> | <b>0.2299</b> | <b>1.1800e-003</b> | <b>0.2311</b> | <b>0.0610</b>  | <b>1.0900e-003</b> | <b>0.0621</b> |          | <b>200.1858</b> | <b>200.1858</b> | <b>4.7900e-003</b> | <b>4.8000e-003</b> | <b>201.7356</b> |

**3.7 Architectural Coating - 2024**

**Unmitigated Construction On-Site**

|                 | ROG            | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|-----------------|----------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|-----------------|-----------------|---------------|-----|-----------------|
| Category        | lb/day         |               |               |                    |               |               |               |                |               |               | lb/day   |                 |                 |               |     |                 |
| Archit. Coating | 56.0835        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          |                 | 0.0000          |               |     | 0.0000          |
| Off-Road        | 0.1808         | 1.2188        | 1.8101        | 2.9700e-003        |               | 0.0609        | 0.0609        |                | 0.0609        | 0.0609        |          | 281.4481        | 281.4481        | 0.0159        |     | 281.8443        |
| <b>Total</b>    | <b>56.2643</b> | <b>1.2188</b> | <b>1.8101</b> | <b>2.9700e-003</b> |               | <b>0.0609</b> | <b>0.0609</b> |                | <b>0.0609</b> | <b>0.0609</b> |          | <b>281.4481</b> | <b>281.4481</b> | <b>0.0159</b> |     | <b>281.8443</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.7 Architectural Coating - 2024**

**Unmitigated Construction Off-Site**

|              | ROG                | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|--------------------|--------------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|--------------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day             |                    |               |                    |               |                    |               |                    |                    |                    | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000             |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 5.1000e-003        | 2.7100e-003        | 0.0373        | 1.1000e-004        | 0.0128        | 7.0000e-005        | 0.0128        | 3.3900e-003        | 6.0000e-005        | 3.4500e-003        |          | 11.1214        | 11.1214        | 2.7000e-004        | 2.7000e-004        | 11.2075        |
| <b>Total</b> | <b>5.1000e-003</b> | <b>2.7100e-003</b> | <b>0.0373</b> | <b>1.1000e-004</b> | <b>0.0128</b> | <b>7.0000e-005</b> | <b>0.0128</b> | <b>3.3900e-003</b> | <b>6.0000e-005</b> | <b>3.4500e-003</b> |          | <b>11.1214</b> | <b>11.1214</b> | <b>2.7000e-004</b> | <b>2.7000e-004</b> | <b>11.2075</b> |

**Mitigated Construction On-Site**

|                 | ROG            | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|-----------------|----------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|-----|-----------------|
| Category        | lb/day         |               |               |                    |               |               |               |                |               |               | lb/day        |                 |                 |               |     |                 |
| Archit. Coating | 56.0835        |               |               |                    |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |               |                 | 0.0000          |               |     | 0.0000          |
| Off-Road        | 0.1808         | 1.2188        | 1.8101        | 2.9700e-003        |               | 0.0609        | 0.0609        |                | 0.0609        | 0.0609        | 0.0000        | 281.4481        | 281.4481        | 0.0159        |     | 281.8443        |
| <b>Total</b>    | <b>56.2643</b> | <b>1.2188</b> | <b>1.8101</b> | <b>2.9700e-003</b> |               | <b>0.0609</b> | <b>0.0609</b> |                | <b>0.0609</b> | <b>0.0609</b> | <b>0.0000</b> | <b>281.4481</b> | <b>281.4481</b> | <b>0.0159</b> |     | <b>281.8443</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**3.7 Architectural Coating - 2024**

**Mitigated Construction Off-Site**

|              | ROG                | NOx                | CO            | SO2                | Fugitive PM10 | Exhaust PM10       | PM10 Total    | Fugitive PM2.5     | Exhaust PM2.5      | PM2.5 Total        | Bio- CO2 | NBio- CO2      | Total CO2      | CH4                | N2O                | CO2e           |
|--------------|--------------------|--------------------|---------------|--------------------|---------------|--------------------|---------------|--------------------|--------------------|--------------------|----------|----------------|----------------|--------------------|--------------------|----------------|
| Category     | lb/day             |                    |               |                    |               |                    |               |                    |                    |                    | lb/day   |                |                |                    |                    |                |
| 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         |
| Vendor       | 0.0000             | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000        | 0.0000             | 0.0000             | 0.0000             |          | 0.0000         | 0.0000         | 0.0000             | 0.0000             | 0.0000         |
| Worker       | 5.1000e-003        | 2.7100e-003        | 0.0373        | 1.1000e-004        | 0.0128        | 7.0000e-005        | 0.0128        | 3.3900e-003        | 6.0000e-005        | 3.4500e-003        |          | 11.1214        | 11.1214        | 2.7000e-004        | 2.7000e-004        | 11.2075        |
| <b>Total</b> | <b>5.1000e-003</b> | <b>2.7100e-003</b> | <b>0.0373</b> | <b>1.1000e-004</b> | <b>0.0128</b> | <b>7.0000e-005</b> | <b>0.0128</b> | <b>3.3900e-003</b> | <b>6.0000e-005</b> | <b>3.4500e-003</b> |          | <b>11.1214</b> | <b>11.1214</b> | <b>2.7000e-004</b> | <b>2.7000e-004</b> | <b>11.2075</b> |

**4.0 Operational Detail - Mobile**

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**4.1 Mitigation Measures Mobile**

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

|             | ROG    | NOx    | CO     | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4    | N2O    | CO2e     |
|-------------|--------|--------|--------|-------------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|--------|--------|----------|
| Category    | lb/day |        |        |             |               |              |            |                |               |             | lb/day   |           |           |        |        |          |
| Mitigated   | 0.2247 | 0.2632 | 1.9790 | 4.2500e-003 | 0.4397        | 3.6600e-003  | 0.4434     | 0.1171         | 3.4300e-003   | 0.1206      |          | 432.1627  | 432.1627  | 0.0247 | 0.0184 | 438.2576 |
| Unmitigated | 0.2247 | 0.2632 | 1.9790 | 4.2500e-003 | 0.4397        | 3.6600e-003  | 0.4434     | 0.1171         | 3.4300e-003   | 0.1206      |          | 432.1627  | 432.1627  | 0.0247 | 0.0184 | 438.2576 |

**4.2 Trip Summary Information**

| Land Use               | Average Daily Trip Rate |          |        | Unmitigated | Mitigated  |
|------------------------|-------------------------|----------|--------|-------------|------------|
|                        | Weekday                 | Saturday | Sunday | Annual VMT  | Annual VMT |
| General Light Industry | 19.84                   | 7.96     | 20.00  | 70,183      | 70,183     |
| Single Family Housing  | 18.88                   | 19.08    | 17.10  | 69,370      | 69,370     |
| Condo/Townhouse        | 14.64                   | 16.28    | 12.56  | 54,208      | 54,208     |
| Total                  | 53.36                   | 43.32    | 49.66  | 193,761     | 193,761    |

**4.3 Trip Type Information**

| Land Use               | Miles      |            |             | Trip %     |            |             | Trip Purpose % |          |         |
|------------------------|------------|------------|-------------|------------|------------|-------------|----------------|----------|---------|
|                        | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary        | Diverted | Pass-by |
| General Light Industry | 14.70      | 6.60       | 6.60        | 59.00      | 28.00      | 13.00       | 92             | 5        | 3       |
| Single Family Housing  | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |
| Condo/Townhouse        | 16.80      | 7.10       | 7.90        | 42.30      | 19.60      | 38.10       | 86             | 11       | 3       |

**4.4 Fleet Mix**

| Land Use               | LDA      | LDT1     | LDT2     | MDV      | LHD1     | LHD2     | MHD      | HHD      | OBUS     | UBUS     | MCY      | SBUS     | MH       |
|------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| General Light Industry | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

|                       |          |          |          |          |          |          |          |          |          |          |          |          |          |
|-----------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Single Family Housing | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |
| Condo/Townhouse       | 0.498717 | 0.062653 | 0.198053 | 0.145608 | 0.036915 | 0.008390 | 0.004146 | 0.008617 | 0.000989 | 0.000520 | 0.029710 | 0.000727 | 0.004955 |

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

|                        | ROG         | NOx    | CO          | SO2         | Fugitive PM10 | Exhaust PM10 | PM10 Total  | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4         | N2O         | CO2e    |
|------------------------|-------------|--------|-------------|-------------|---------------|--------------|-------------|----------------|---------------|-------------|----------|-----------|-----------|-------------|-------------|---------|
| Category               | lb/day      |        |             |             |               |              |             |                |               |             | lb/day   |           |           |             |             |         |
| NaturalGas Mitigated   | 1.3600e-003 | 0.0119 | 6.6000e-003 | 7.0000e-005 |               | 9.4000e-004  | 9.4000e-004 |                | 9.4000e-004   | 9.4000e-004 |          | 14.8513   | 14.8513   | 2.8000e-004 | 2.7000e-004 | 14.9395 |
| NaturalGas Unmitigated | 1.3600e-003 | 0.0119 | 6.6000e-003 | 7.0000e-005 |               | 9.4000e-004  | 9.4000e-004 |                | 9.4000e-004   | 9.4000e-004 |          | 14.8513   | 14.8513   | 2.8000e-004 | 2.7000e-004 | 14.9395 |



Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**5.2 Energy by Land Use - NaturalGas**

**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        | lb/day             |               |                    |                    |               |                    |                    |                |                    |                    | lb/day   |                |                |                    |                    |                |
| Condo/Townhouse        | 27.1242        | 2.9000e-004        | 2.5000e-003   | 1.0600e-003        | 2.0000e-005        |               | 2.0000e-004        | 2.0000e-004        |                | 2.0000e-004        | 2.0000e-004        |          | 3.1911         | 3.1911         | 6.0000e-005        | 6.0000e-005        | 3.2101         |
| General Light Industry | 38.137         | 4.1000e-004        | 3.7400e-003   | 3.1400e-003        | 2.0000e-005        |               | 2.8000e-004        | 2.8000e-004        |                | 2.8000e-004        | 2.8000e-004        |          | 4.4867         | 4.4867         | 9.0000e-005        | 8.0000e-005        | 4.5134         |
| Single Family Housing  | 60.9746        | 6.6000e-004        | 5.6200e-003   | 2.3900e-003        | 4.0000e-005        |               | 4.5000e-004        | 4.5000e-004        |                | 4.5000e-004        | 4.5000e-004        |          | 7.1735         | 7.1735         | 1.4000e-004        | 1.3000e-004        | 7.2161         |
| <b>Total</b>           |                | <b>1.3600e-003</b> | <b>0.0119</b> | <b>6.5900e-003</b> | <b>8.0000e-005</b> |               | <b>9.3000e-004</b> | <b>9.3000e-004</b> |                | <b>9.3000e-004</b> | <b>9.3000e-004</b> |          | <b>14.8513</b> | <b>14.8513</b> | <b>2.9000e-004</b> | <b>2.7000e-004</b> | <b>14.9395</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**5.2 Energy by Land Use - NaturalGas**

**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        | lb/day             |               |                    |                    |               |                    |                    |                |                    |                    | lb/day   |                |                |                    |                    |                |
| Condo/Townhouse        | 0.0271242      | 2.9000e-004        | 2.5000e-003   | 1.0600e-003        | 2.0000e-005        |               | 2.0000e-004        | 2.0000e-004        |                | 2.0000e-004        | 2.0000e-004        |          | 3.1911         | 3.1911         | 6.0000e-005        | 6.0000e-005        | 3.2101         |
| General Light Industry | 0.038137       | 4.1000e-004        | 3.7400e-003   | 3.1400e-003        | 2.0000e-005        |               | 2.8000e-004        | 2.8000e-004        |                | 2.8000e-004        | 2.8000e-004        |          | 4.4867         | 4.4867         | 9.0000e-005        | 8.0000e-005        | 4.5134         |
| Single Family Housing  | 0.0609746      | 6.6000e-004        | 5.6200e-003   | 2.3900e-003        | 4.0000e-005        |               | 4.5000e-004        | 4.5000e-004        |                | 4.5000e-004        | 4.5000e-004        |          | 7.1735         | 7.1735         | 1.4000e-004        | 1.3000e-004        | 7.2161         |
| <b>Total</b>           |                | <b>1.3600e-003</b> | <b>0.0119</b> | <b>6.5900e-003</b> | <b>8.0000e-005</b> |               | <b>9.3000e-004</b> | <b>9.3000e-004</b> |                | <b>9.3000e-004</b> | <b>9.3000e-004</b> |          | <b>14.8513</b> | <b>14.8513</b> | <b>2.9000e-004</b> | <b>2.7000e-004</b> | <b>14.9395</b> |

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

|             | ROG    | NOx    | CO     | SO2    | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4    | N2O         | CO2e     |
|-------------|--------|--------|--------|--------|---------------|--------------|------------|----------------|---------------|-------------|----------|-----------|-----------|--------|-------------|----------|
| Category    | lb/day |        |        |        |               |              |            |                |               |             | lb/day   |           |           |        |             |          |
| Mitigated   | 6.4223 | 0.1234 | 7.8865 | 0.0137 |               | 1.0613       | 1.0613     |                | 1.0613        | 1.0613      | 111.0869 | 47.1833   | 158.2702  | 0.1031 | 8.7400e-003 | 163.4513 |
| Unmitigated | 6.4223 | 0.1234 | 7.8865 | 0.0137 |               | 1.0613       | 1.0613     |                | 1.0613        | 1.0613      | 111.0869 | 47.1833   | 158.2702  | 0.1031 | 8.7400e-003 | 163.4513 |

**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           | lb/day        |               |               |               |               |               |               |                |               |               | lb/day          |                |                 |               |                    |                 |
| Architectural Coating | 0.0768        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Consumer Products     | 0.2140        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Hearth                | 6.1216        | 0.1196        | 7.5564        | 0.0137        |               | 1.0595        | 1.0595        |                | 1.0595        | 1.0595        | 111.0869        | 46.5882        | 157.6752        | 0.1025        | 8.7400e-003        | 162.8419        |
| Landscaping           | 9.9400e-003   | 3.8000e-003   | 0.3301        | 2.0000e-005   |               | 1.8300e-003   | 1.8300e-003   |                | 1.8300e-003   | 1.8300e-003   |                 | 0.5951         | 0.5951          | 5.7000e-004   |                    | 0.6094          |
| <b>Total</b>          | <b>6.4224</b> | <b>0.1234</b> | <b>7.8865</b> | <b>0.0137</b> |               | <b>1.0613</b> | <b>1.0613</b> |                | <b>1.0613</b> | <b>1.0613</b> | <b>111.0869</b> | <b>47.1833</b> | <b>158.2702</b> | <b>0.1031</b> | <b>8.7400e-003</b> | <b>163.4513</b> |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**6.2 Area by SubCategory**

**Mitigated**

|                       | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2        | NBio- CO2      | Total CO2       | CH4           | N2O                | CO2e            |
|-----------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|-----------------|----------------|-----------------|---------------|--------------------|-----------------|
| SubCategory           | lb/day        |               |               |               |               |               |               |                |               |               | lb/day          |                |                 |               |                    |                 |
| Architectural Coating | 0.0768        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Consumer Products     | 0.2140        |               |               |               |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |                 |                | 0.0000          |               |                    | 0.0000          |
| Hearth                | 6.1216        | 0.1196        | 7.5564        | 0.0137        |               | 1.0595        | 1.0595        |                | 1.0595        | 1.0595        | 111.0869        | 46.5882        | 157.6752        | 0.1025        | 8.7400e-003        | 162.8419        |
| Landscaping           | 9.9400e-003   | 3.8000e-003   | 0.3301        | 2.0000e-005   |               | 1.8300e-003   | 1.8300e-003   |                | 1.8300e-003   | 1.8300e-003   |                 | 0.5951         | 0.5951          | 5.7000e-004   |                    | 0.6094          |
| <b>Total</b>          | <b>6.4224</b> | <b>0.1234</b> | <b>7.8865</b> | <b>0.0137</b> |               | <b>1.0613</b> | <b>1.0613</b> |                | <b>1.0613</b> | <b>1.0613</b> | <b>111.0869</b> | <b>47.1833</b> | <b>158.2702</b> | <b>0.1031</b> | <b>8.7400e-003</b> | <b>163.4513</b> |

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**9.0 Operational Offroad**

---

| Equipment Type      | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|-----------|-------------|-------------|-----------|
| Off-Highway Trucks  | 1      | 2.00      | 260       | 402         | 0.38        | Diesel    |
| Rubber Tired Dozers | 1      | 2.00      | 260       | 247         | 0.40        | Diesel    |

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**UnMitigated/Mitigated**

|                     | ROG           | NOx           | CO            | SO2                | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2      | NBio- CO2       | Total CO2       | CH4           | N2O | CO2e            |
|---------------------|---------------|---------------|---------------|--------------------|---------------|---------------|---------------|----------------|---------------|---------------|---------------|-----------------|-----------------|---------------|-----|-----------------|
| Equipment Type      | lb/day        |               |               |                    |               |               |               |                |               |               | lb/day        |                 |                 |               |     |                 |
| Off-Highway Trucks  | 0.1194        | 0.7165        | 0.7964        | 3.3100e-003        |               | 0.0256        | 0.0256        |                | 0.0236        | 0.0236        | 0.0000        | 319.9189        | 319.9189        | 0.1035        |     | 322.5056        |
| Rubber Tired Dozers | 0.1620        | 1.6578        | 0.7494        | 2.1300e-003        |               | 0.0725        | 0.0725        |                | 0.0667        | 0.0667        | 0.0000        | 206.7400        | 206.7400        | 0.0669        |     | 208.4116        |
| <b>Total</b>        | <b>0.2814</b> | <b>2.3743</b> | <b>1.5458</b> | <b>5.4400e-003</b> |               | <b>0.0981</b> | <b>0.0981</b> |                | <b>0.0903</b> | <b>0.0903</b> | <b>0.0000</b> | <b>526.6589</b> | <b>526.6589</b> | <b>0.1703</b> |     | <b>530.9172</b> |

**10.0 Stationary Equipment**

**Fire Pumps and Emergency Generators**

| Equipment Type      | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---------------------|--------|-----------|------------|-------------|-------------|-----------|
| Emergency Generator | 1      | 0         | 50         | 202         | 0.73        | CNG       |

**Boilers**

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

**User Defined Equipment**

| Equipment Type | Number |
|----------------|--------|
|----------------|--------|

Apogee-Livestock - Great Basin UAPCD Air District, Summer

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

**10.1 Stationary Sources**

**Unmitigated/Mitigated**

|  | ROG           | NOx           | CO            | SO2           | Fugitive PM10 | Exhaust PM10  | PM10 Total    | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total   | Bio- CO2 | NBio- CO2     | Total CO2     | CH4           | N2O | CO2e          |
|--|---------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|---------------|---------------|----------|---------------|---------------|---------------|-----|---------------|
| Equipment Type                         | lb/day        |               |               |               |               |               |               |                |               |               | lb/day   |               |               |               |     |               |
| Emergency Generator - CNG (0 - 500 HP) | 0.0000        | 0.0000        | 0.0000        | 0.0000        |               | 0.0000        | 0.0000        |                | 0.0000        | 0.0000        |          | 0.0000        | 0.0000        | 0.0000        |     | 0.0000        |
| <b>Total</b>                           | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |               | <b>0.0000</b> | <b>0.0000</b> |                | <b>0.0000</b> | <b>0.0000</b> |          | <b>0.0000</b> | <b>0.0000</b> | <b>0.0000</b> |     | <b>0.0000</b> |

**11.0 Vegetation**

---

**Field Crops Buidout Scenario - GHG Calculation**

|                                      | <b>Area/acre</b> |
|--------------------------------------|------------------|
| <b>Single Family Dwelling</b>        | 0.1              |
| <b>Accessory Dwelling</b>            | 0.046            |
| <b>Accessary Building</b>            | 0.3              |
| <b>Field Crops</b>                   | 78.004           |
| Alfalfa-leading crop in Mono County. |                  |

| <b>Crop</b>        | <b>Annual GHG Emissions/Acre (MTCO<sub>2</sub>e) 1</b> | <b>Total Annual GHG Emissions for Project (MTCO<sub>2</sub>e)</b> |
|--------------------|--|---|
| <b>Rice</b>        | 5.47   | 426.68188   |
| <b>Lettuce</b>     | 4.74   | 369.73896   |
| <b>Tomatoes</b>    | 3.95   | 308.1158  |
| <b>Wine Grapes</b> | 1.23   | 95.94492  |
| <b>Almonds</b>     | 1.7  | 132.6068  |
| <b>Corn</b>        | 0.65   | 50.7026   |
| <b>Alfalfa 2</b>   | -2.24  | -174.72896  |

Notes:

1. The GHG emission rate is calculated based on the biogeochemical changes and farming activities for crops. The biogeochemical changes include the amount of biological activity in soil, primarily of microbes that convert inorganic and organic forms of nitrogen present in soil into compounds needed by plants for growth and incorporating organic matter into the soil increased soil carbon sequestration. Farming activities include plowing, planting, fertilizing and harvesting.

2. The negative emission from Alfalfa production area due largely to the significant amount of carbon sequestered (removed from the atmosphere and stored) in the soil by its expansive root systems. Biogeochemical changes = 3.97 MT CO<sub>2</sub>e and farming activities = 1.73 MT CO<sub>2</sub>e.

Source: American Farmland Trust, A New Comparison of Greenhouse Gas Emissions form California Agricultural

**Livestock Buildout Scenario GHG Calculation**

|   | <b>Area/acre</b> |
|---|------------------|
| <b>Single Family Dwelling</b>   | 0.1              |
| <b>Accessory Dwelling</b>   | 0.046            |
| <b>Accessory Building</b>   | 0.1              |
| <b>Livestock</b>  | 78.204           |
| Note: 39 animals for 78.304 acres, roughly 1.5 to 2 acres/animal (for average weight of 1,200 lbs). |                  |
| Source: NRCS, Balancing your Animals with your Forage, January 2009.                                |                  |

|  | <b>(2017 CA Data)</b> | <b>Average Live Weight/kg</b> |
|--|-----------------------|-------------------------------|
| <b>Commercial Cattle Slaughter</b>   | 1,346                 | 610.53                        |
| Source: USDA, National Agricultural Statistics Service, Livestock Slaughter, January 25, 2018. |                       |                               |

| <b>Commodities</b>   | <b>GHG Emissions (kg CO2 eq. per kg of product) 1</b> | <b>Total GHG Emission (kg CO2 eq.) for 39 Animals</b> | <b>Total GHG Emission (MT CO2 eq.) for 39 Animals</b> | <b>GHG Emission/Year (MT CO2 eq.) for 39 Animals 2</b> |
|--|---|---|---|--|
| <b>Milk:</b> production, processing and transport                            | 2.4   |   |   |  |
| <b>Meat:</b> produced from slaughtered dairy cows and bulls (carcass weight) | 15.6  |   |   |  |
| <b>Meat:</b> produced from fattened surplus calves (carcass weight)          | 20.2  | 480,979.34  | 480.98  | 137.42   |

Notes:

1. The GHG emissions rate is based on a life cycle assessment. The assessment encompasses the entire chain of cow milk, from feed production through to the final processing of milk and meat, including all upstream processes in livestock production up to the point where the animals or products leave the farm and transport to retail distributor.
2. The approximate maximum age limitation for the Prime, Choice, and Standard grades of steers, heifers, and cows is 42 months (3.5 years).

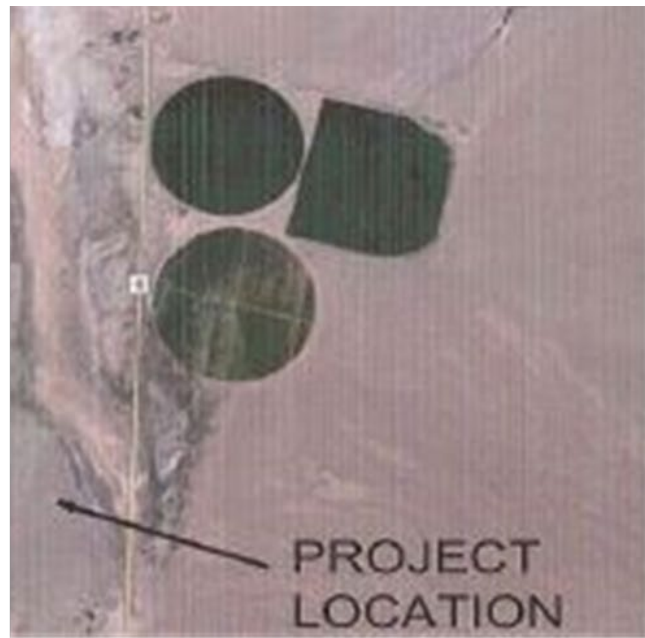
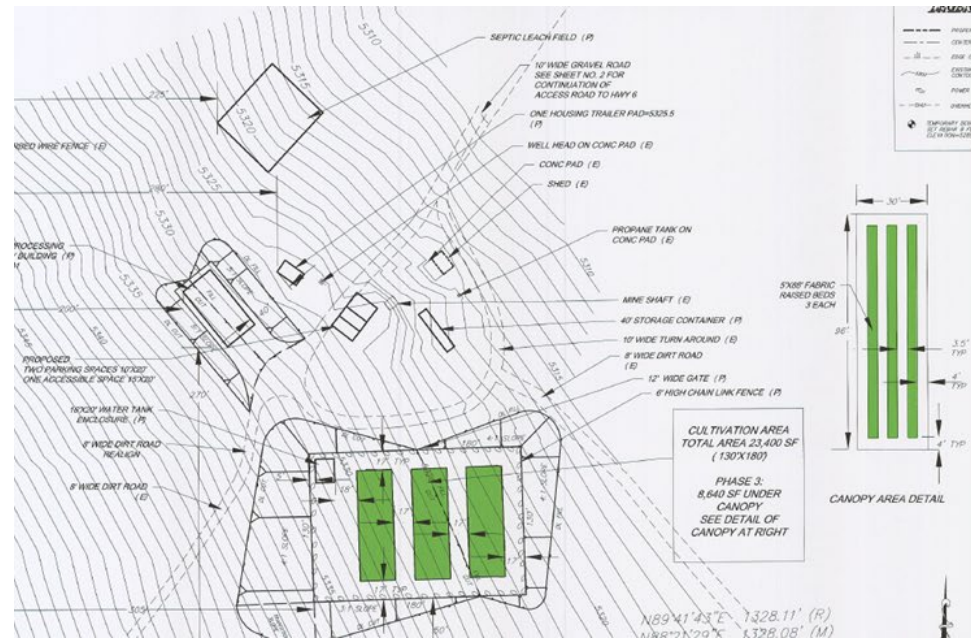
Source: Food and Agriculture Organization of the United Nations, Greenhouse Gas Emissions from the Dairy Section - A Life Cycle Assessment; USDA, United States Standards for Grades of Slaughter Cattle, July 1, 1996.



## Appendix C

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### **Focused Rare Plants Survey**



# Mono County Apogee Farms Focused Rare Plant Survey Report

August 2020

717 Market Street, Suite 650  
San Francisco, CA 94103  
650-373-1200  
[www.panoramaenv.com](http://www.panoramaenv.com)



# Mono County Apogee Farms Focused Rare Plant Survey Report

**August 2020**

**Prepared for:**

Mono County Community Development Department  
Planning Division  
P.O. Box 347  
Mammoth Lakes, CA 93546

**Prepared by:**

Panorama Environmental, Inc.  
717 Market Street, Suite 650  
San Francisco, CA 94103

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# 1 Background

## 1.1 Project Summary

### 1.1.1 Proposed Project

Mono County (Lead Agency) received General Plan Amendment and Conditional Use Permit applications from Apogee Farms, Inc. (Apogee Farms). A General Plan Amendment is requested to designate two parcels from Rural Residential to Agriculture. Apogee Farms is seeking approval for a Conditional Use Permit under the Agriculture designation to construct and operate a commercial cannabis facility on the northern parcel of the project site. The Conditional Use Permit would permit construction and operation of a commercial cannabis facility, which is not permitted under the existing General Plan designation of Rural Residential.

The approval of the General Plan Amendment and proposed cannabis facility constitutes a project that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code, Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Section 15000 et. seq.).

### 1.1.2 Project Location

The project site is located in an unincorporated area of Mono County, approximately 2.5 miles south of the town of Benton and west of Highway 6. Figure 1 and Figure 2 illustrate the regional and vicinity location of the project site.

**Assessor's Parcel Numbers (APNs):** 025-020-013, 025-040-002

**Address:** 23555 Highway 6, Benton, CA 93512

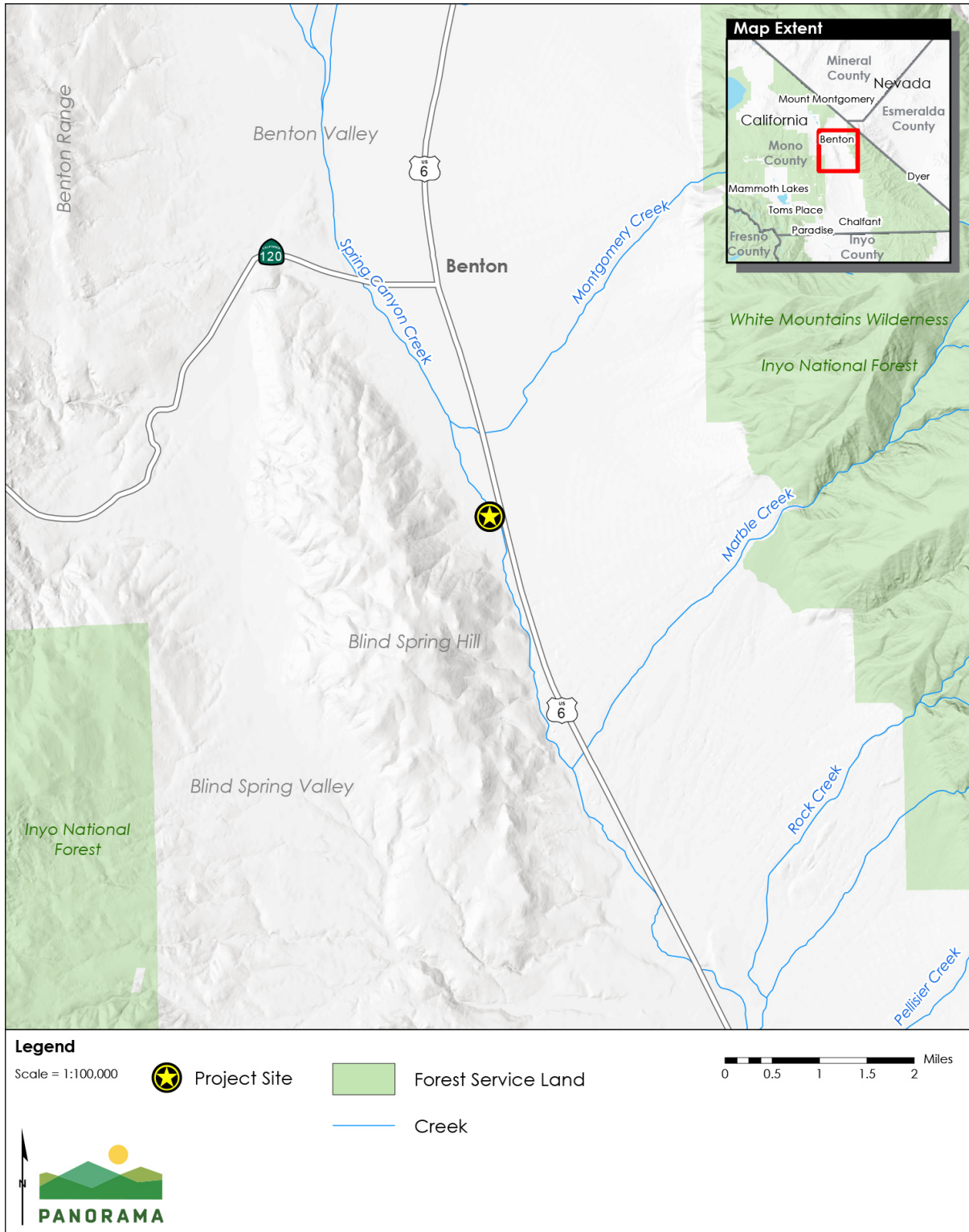
**Latitude, Longitude:** 37.784047, -118.468509

## 1.2 Purpose of Focused Surveys

The initial habitat assessment and California Natural Diversity Database (CNDDDB) search conducted for the Apogee Farms site revealed the presence of suitable habitat for several special-status plant species on the project site. The project and future uses of the site under the General Plan Amendment could affect special-status plants that have a potential to occur in the area. The project impacts on any special-status plants must be evaluated in accordance with the requirements of the CEQA prior to project approval. The special-status plant survey was conducted to evaluate whether the project would impact any populations of special-status plants.

# 1 BACKGROUND

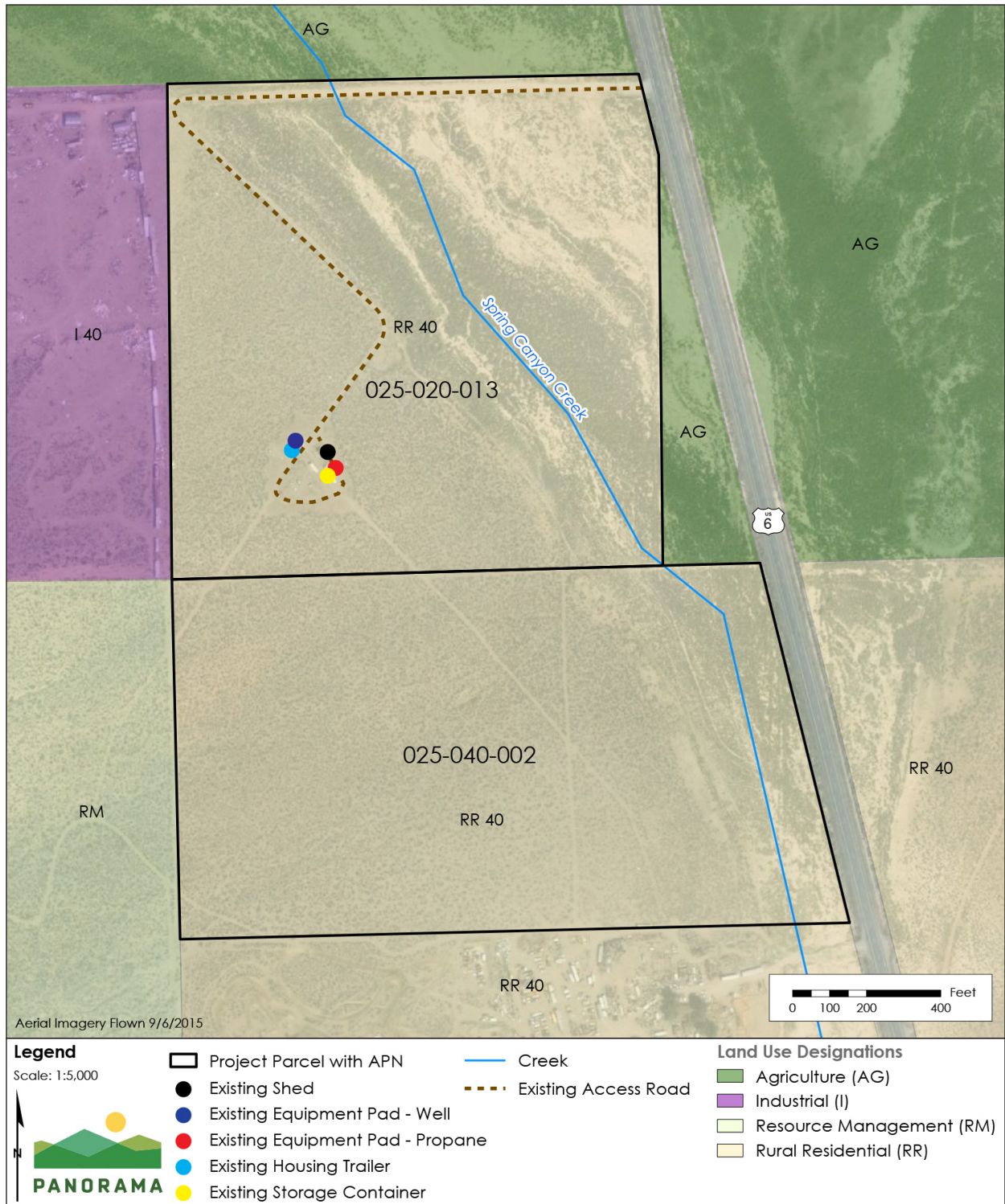
Figure 1: Regional Location



Sources: (USGS, 2019; Tele Atlas North America, Inc., 2019; USGS, 2019)

# 1 BACKGROUND

**Figure 2: Project Site**



Sources: (Mono County, 2019; Tele Atlas North America, Inc., 2019; USGS, 2019)



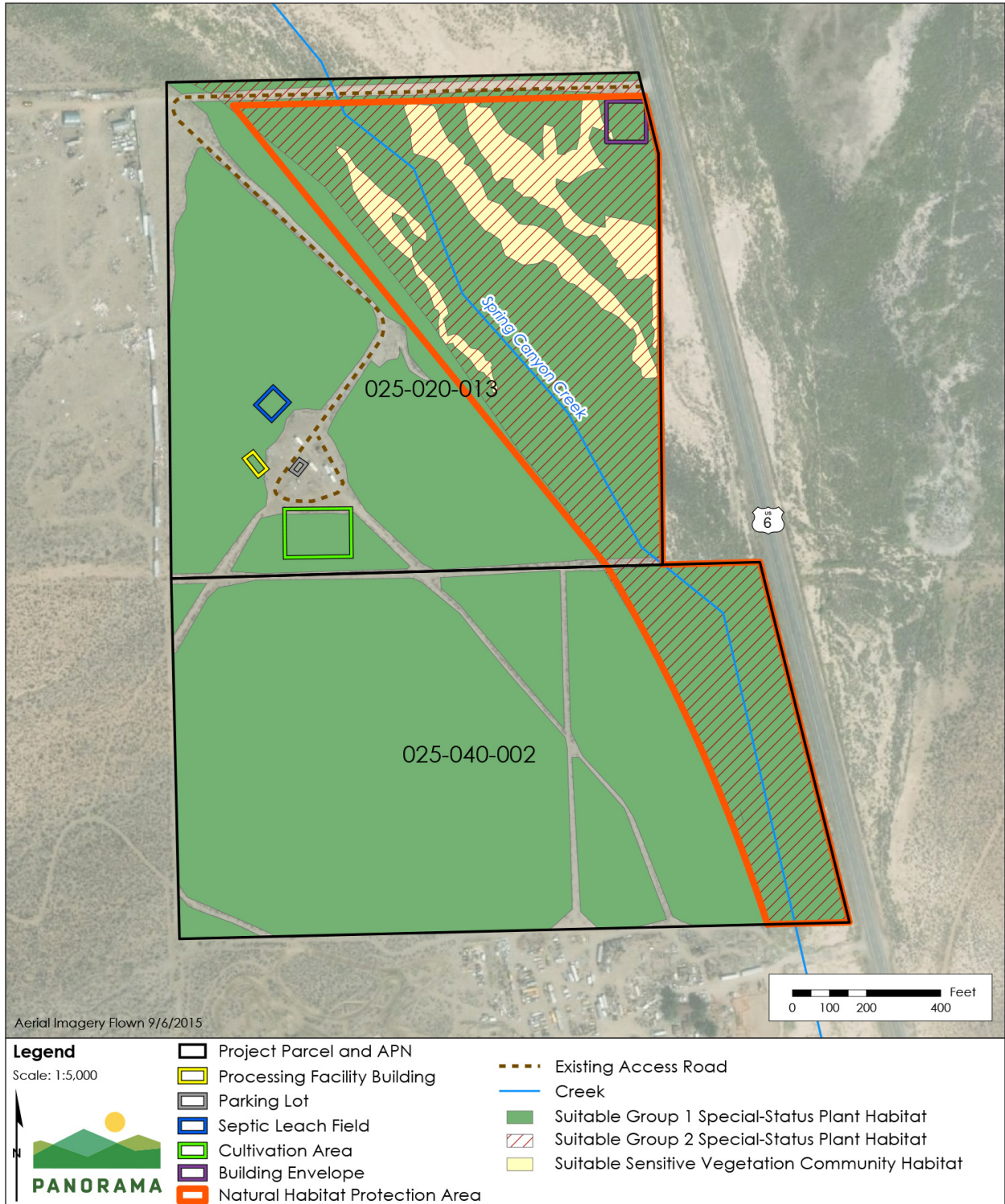
## 1 BACKGROUND

### 1.3 Potential Special-Status Plants and Habitat on the Project Site

Based on the evaluation of the project site conditions and the reconnaissance survey, 11 special-status plant species have the potential to occur on the project site. Three other special-status plant species may occur but are unlikely. Special-status plant species that could occur in the project area are listed in Table 1, and photos are attached as Appendix B. Special-status plant species have a potential to occur in the Big Sagebrush Shrubland Alliance and Rubber Rabbit Brush Scrub Shrubland Alliance vegetation communities on the project site. These suitable habitat locations are shown on Figure 3.

# 1 BACKGROUND

**Figure 3: Habitat Suitability for Special-Status Plants and Sensitive Vegetation Communities**



## 1 BACKGROUND

**Table 1: Special-status Plant Species with Potential to Occur on Project Site**

| Scientific Name                         | Common Name            | Family        | Lifeform       | CRPR <sup>1</sup> | FESA/CDFW | Blooming Period | Habitat/Range   |
|---|------------------------|---------------|----------------|-------------------|-----------|-----------------|---|
| <i>Ivesia kingii</i> var. <i>kingii</i> | alkali ivesia          | Rosaceae      | perennial herb | 2B.2              | None      | June-August     | <b>Low.</b> Great Basin Scrub, meadows and seeps, playas/mesic, alkali, Observed at elevations from 1200 -2130 meters.  |
| <i>Calochortus excavatus</i>            | Inyo County star-tulip | Lilaceae      | perennial herb | 1B.1              | None      | April- July     | <b>Low.</b> Chenopod scrub, meadows and seeps/alkaline and mesic Observed at elevations from 1150 -200 meters. Known from small remnants of former populations. |
| <i>Crepis runcinata</i>                 | fiddleleaf hawksbeard  | Asteraceae    | perennial herb | 2B.2              | None      | May-July        | <b>Moderate.</b> Mojave Desert scrub, pinyon and juniper woodland/mesic, alkaline. Observed at elevations from 1250-1450 meters.                                |
| <i>Phacelia inyoensis</i>               | Inyo phacelia          | Boraginaceae  | annual herb    | 1B.2              | None      | April-August    | <b>Moderate.</b> Meadows and seeps (alkaline). Observed at elevations from 915-3200 meters.   |
| <i>Micromonolepis pusilla</i>           | dwarf monolepis        | Chenopodaceae | annual herb    | 2B.3              | None      | April-May       | <b>Moderate.</b> Alkaline, openings in Great basin scrub. Observed at elevations from 1500-2400 meters.   |
| <i>Cryptantha fendleri</i>              | sand dune cryptantha   | Boraginaceae  | annual herb    | 2B.2              | None      | June-July       | <b>Low.</b> Sand dunes, sandy soils, sagebrush scrub. Observed at elevations from 1950-2210 meters.   |
| <i>Plagiobothrys parishii</i>           | Parish's popcornflower | Boraginaceae  | annual herb    | 1B.1              | None      | March-May       | <b>Low.</b> Wet alkaline meadows around springs and emergent wetlands or lake beds Observed at elevations from 750-1400 meters.                                 |

## 1 BACKGROUND

| Scientific Name                           | Common Name            | Family        | Lifeform                         | CRPR <sup>1</sup> | FESA/CDFW | Blooming Period | Habitat/Range   |
|---|------------------------|---------------|----------------------------------|-------------------|-----------|-----------------|---|
| <i>Viola aurea</i>                        | golden violet          | Violaceae     | perennial herb                   | 2B.2              | None      | April-June      | <b>Moderate.</b> Great basin scrub, pinyon and juniper woodland. Observed at elevations from 1000-1800 meters.  |
| <i>Boechea dispar</i>                     | Pinyon rockcress       | Brassicaceae  | perennial herb                   | 2B.3              | None      | March-June      | <b>Low.</b> Joshua tree woodland, pinyon and juniper woodland. Mojavean desert scrub; granitic, gravelly. Observed at elevations from 1200-2400 meters.   |
| <i>Cymopterus globosus</i>                | globose cymopterus     | Apiaceae      | perennial herb                   | 2B.2              | None      | May-July        | <b>Low.</b> Great Basin scrub. Sandy, open flats. Observed at elevations from 1215-2090 m. Last seen 04-26-1897   |
| <i>Phacelia gymnoclada</i>                | naked-stemmed phacelia | Boraginaceae  | Annual herb                      | 2B.3              | None      | April-August    | <b>Low.</b> Chenopod scrub, Great Basin scrub, pinyon and juniper woodland. Gravelly or clay soils. Observed from 1200-2500 meters.   |
| <i>Chaetadelpa wheeleri</i>               | Wheeler's dune broom   | Asteraceae    | perennial herb (rhizomatous)     | 2B.2              | None      | April-Sept.     | <b>Low.</b> Desert dunes, Great Basin scrub Mojavean desert scrub; sandy. Observed from 795-1900 meters.  |
| <i>Orobanche ludoviciana var. arenosa</i> | Suksdorf's broomrape   | Orobanchaceae | perennial herb (achlorophyllous) | 2B.3              | None      | June-Sep(Oct)   | <b>Moderate.</b> Parasitic on <i>Ericameria</i> and <i>Iva</i> spp. Similar to <i>O. parishii</i> ssp. <i>parishii</i> ; separation between them blurred in Great Basin. Observed from 795-1900 meters. |
| <i>Sphaeromeria potentilliodes</i>        | Alkali tansy-sage      | Asteraceae    | perennial herb                   | 2B.2              | None      | May-July        | <b>Low.</b> Great Basin scrub. Sandy, open flats. Observed at elevations from 1985-2248 meters.   |

## 1 BACKGROUND

| Scientific Name | Common Name | Family | Lifeform | CRPR <sup>1</sup> | FESA/CDFW | Blooming Period | Habitat/Range |
|-----------------|-------------|--------|----------|-------------------|-----------|-----------------|---------------|
|-----------------|-------------|--------|----------|-------------------|-----------|-----------------|---------------|

<sup>1</sup> CRPR Rankings:

1B: Plants rare, threatened, or endangered in California and elsewhere

2B: Plants rare, threatened, or endangered in California but more common elsewhere

Threat Ranks:

0.1: Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)

0.2: Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)

0.3: Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

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## 2 Survey Methods

### 2.1 Survey Timing

Focused botanical surveys were conducted by biologist Russell Kokx on May 28, 2020 and June 17, 2020. A previous reconnaissance-level biological survey was conducted on November 8, 2019. Surveys were conducted to determine whether special-status plant species or their habitat were present within the biological study area (BSA).

The botanical resources survey was conducted under favorable conditions for special-status plant species to be in suitable phenology for detection. The rainfall timing and totals for the 2020 growing season of December through April were sufficient for prolific germination and flowering conditions. The total at the time of the survey was 4.61 inches with a significant amount of rainfall in March (1.55 inches).

### 2.2 Survey Method

The botanical surveys followed guidelines published by CDFW (2009), U.S. Fish and Wildlife Service (USFWS) (1996), and CNPS (2001). Database queries and reference site visits identified 11 special-status plant species with potential to occur within the Biological survey area (BSA). The list of potentially occurring sensitive plant species (shown in Table 1) was refined, adding new species based upon new location information and updating the status of each species placed on the search list.

### 2.3 Reference Site Visits

Reference site visits were conducted for 11 special-status plant species with potential to occur in the BSA. Table 2 contains information on the source and location of these sites, the date the sites were visited, and observations of the targeted special-status species. These sites were visited by botanists Russell Kokx and Onkar Singh on May 27, 2020 and Russell Kokx on June 17, 2020.

## 2 METHODS

**Table 2: Reference Site Populations Visited**

| Taxon                         | Coordinates (Zone and UTM in NAD 83)     | Observations  | Date                            |
|-------------------------------|--|---|---------------------------------|
| <i>Ivesia kingii</i>          | 11S 361042 4189268<br>11S 361140 4190036 | CNDDDB. Thousands, 80% in flower. This species is found in the general area but in wetter habitats than in the BSA  | June 15, 2020                   |
| <i>Plagiobothrys parishii</i> | 11S 360899 4186401                       | CNDDDB 300 + plants 90% of the plants observed flowering. This species unlikely to occur as it requires saturated soils not evident in the habitat of the BSA                                     | June 15, 2020                   |
| <i>Cymopterus globosus</i>    | 11S 423215 4149256                       | Cal flora Consortium X 15. Plants were vegetative only but readily identifiable.  | May 27, 2020                    |
| <i>Calochortus excavatus</i>  | 11S 361005 4189288                       | CNDDDB X 35 plants 95% in flower.   | June 15, 2020                   |
| <i>Cryptantha fendleri</i>    | 11S 361855 4183702                       | CNDDDB This species was not located after two site visits. There is only one known occurrence   | May 25 and June 25, 2020.       |
| <i>Phacelia inyoensis</i>     | 11S 401231 4049092                       | N. Jensen new reference population. X 80 plants. Plants were 60% in flower 40% in fruit but somewhat diminutive even by this species standard.  | May 25, 2020                    |
| <i>Crepis rucinata</i>        | 11S 360942 4187115                       | CNDDDB This occurrence was poorly mapped and corrected to over 600 feet to the east of the original coordinates. Plants were 80% in flower. Suitable soils and conditions are present in the BSA. | May 25, 2020 and June 15, 2020. |

## 2 METHODS

|                                |                    |   |               |
|--------------------------------|--------------------|---|---------------|
| <i>Micromonolepis pusillus</i> | 11S 244898 4173773 | Consortium of California Herbaria x 50+ plants. Plants had already fruited and were withered. Plants should have been detectable during the May 28, 2020 survey.  | June 15, 2020 |
| <i>Chaetodelpha wheeleri</i>   | 11S 425108 4147877 | Consortium of California Herbaria x plants 60% in flower 40% in bud, with <i>Cymopterus globosus</i> .  | May 25, 2020  |
| <i>Phacelia gymnoclada</i>     | 11S 360765 4222037 | CNDDDB This species was not found the habitat description was correct clay to gravely soils. The project BSA consists of sands soils and alkine silty soils only. | June 15, 2020 |
| <i>Boechera dispar</i>         | 11S 397416 4125145 | Consortium of California Herbaria X 12 Plants 50% in flower 50% in fruit.   | May 25, 2020. |



### 3 Results

The results of the focused botanical surveys indicate that previously mapped vegetation communities remain unchanged in composition and area. Based on the results of the reference site visits, survey conditions were optimal for detecting the presence of special-status plant species. No special-status plant species were detected within the Apogee Farms BSA. Germination of annuals was high as was diversity with seventeen new taxon added to the cumulative plant species total. The new 2020 taxon observed are in bold text in the cumulative species list (attached as Appendix A). Three of the new observed taxon are non-native species and considered invasive. The non-natives include Russian thistle (*Salsola tragus*), red brome (*Bromus madritensis*) and Arabian schismus (*Schismus arabicus*). Five cacti locations were flagged and staked for avoidance in and around the BSA: one silver cholla (*Cylindropuntia echinocarpa*) and four beavertail cactus (*Opuntia basilaris* var. *basilaris*).

### 4 Conclusion

The results of the focused special-status plant survey revealed that no special-status plant species are present within the Apogee Farms BSA. The Apogee Farms Project and General Plan Amendment would have no impact on special-status plant species. No additional mitigation is recommended to address rare or special-status species.

### 5 References

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## 5 REFERENCES

- Howald, Ann MS Botany. Personal communication with Ann Howald via emails, on June 15<sup>th</sup>, 2020. Regarding rare plant distribution of *Cryptantha fendleri* and *Phacelia gymnoclada*.
- Sawyer, J.O., T. Keeler-Wolf, and J.M Evens. 2009. *A Manual of California Vegetation 2<sup>nd</sup> Edition*. California Native Plant Society Press. Sacramento, California.
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## APPENDICES

### APPENDICES

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|                   |                              |
|-------------------|------------------------------|
| <b>Appendix A</b> | <b>Cumulative Plant List</b> |
| <b>Appendix B</b> | <b>Photos</b>                |

## APPENDIX A

### APPENDIX A

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#### Cumulative Plant List

## APPENDIX A

### *Plant List – Apogee Farms, Mono County, CA*

This list is a compilation of the results of three botanical surveys that were conducted on November 8, 2019, May 28, 2020 and June 17, 2020. Surveys were conducted by Russell Kokx and Onkar Singh. Following the California Department of Fish and Game (CDFG). 2009. Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities.

| <b>Scientific Name</b>                          | <b>Common Name</b>      |
|---|-------------------------|
| <i>Ephedraceae</i>                              |                         |
| <i>Ephedra nevadensis</i>                       | Nevada ephedra          |
| <i>Amaranthaceae</i>                            |                         |
| <i>Nitrophila occidentalis</i>                  | Western nitrophila      |
| <i>Asteraceae</i>                               |                         |
| <i>Ambrosia acanthicarpa</i>                    | annual bur-sage         |
| <i>Artemisia spinescens</i>                     | budsage                 |
| <i>Artemisia tridentata ssp. tridentata</i>     | big sagebrush           |
| <i>Chaenactis macrantha</i>                     | Mojave pincushion       |
| <i>Chaenactis stevioides</i>                    | Esteve's pincushion     |
| <i>Chaenactis xantiana</i>                      | Xantus' pincushion      |
| <i>Dieteria canescens</i>                       | hoary aster             |
| <i>Ericameria nauseosa var. c.f. oreophila</i>  | Great basin rabbitbrush |
| <i>Erigeron canadensis</i>                      | horseweed               |
| <i>Eriophyllum pringlei</i>                     | Pringle's eriophyllum   |
| <i>Eriophyllum wallacei</i>                     | easter bonnets          |
| <i>Iva axillaris</i>                            | poverty weed            |
| <i>Layia glandulosa</i>                         | white tidy-tip          |
| <i>Lessingia glandulifera var. glandulifera</i> | Lemmon's lessingia      |
| <i>Logfia filaginoides</i>                      | California cottonrose   |

## APPENDIX A

|   |                       |
|---|-----------------------|
| <i>Malacothrix glabrata</i>                           | desert dandelion      |
| <i>Stephanomeria exigua</i>                           | small wirelettuce     |
| <i>Stephanomeria pauciflora</i>                       | wire-lettuce          |
| <i>Tetradymia axillaris</i> var. <i>longispina</i>    | longspine horsebrush  |
| <b>Boraginaceae</b>                                   |                       |
| <i>Amsinckia tessellata</i> var. <i>tessellata</i>    | fiddleneck            |
| <i>Cryptantha circumscissa</i> var. <i>rosulata</i>   | capped Cryptantha     |
| <i>Cryptantha micrantha</i>                           | redroot cryptantha    |
| <i>Cryptantha pterocarya</i>                          | wingnut cryptantha    |
| <i>Heliotropium curassavicum</i> var. <i>oculatum</i> | salt heliotrope       |
| <i>Lappula redowski</i> var. <i>occidentalis</i>      | Redowski's stickseed  |
| <i>Phacelia vallis-mortae</i>                         | Death Valley phacelia |
| <i>Tiquilia nuttallii</i>                             | Nuttall's tiquilia    |
| <b>Brassicaceae</b>                                   |                       |
| <i>Descurainia pinnata</i>                            | western tansy mustard |
| <i>Lepidium flavum</i>                                | yellow peppergrass    |
| <i>Sisymbrium irio</i>                                | London rocket         |
| <i>Stanleya pinnata</i> var. <i>pinnata</i>           | Inyo desert plume     |
| <b>Cactaceae</b>                                      |                       |
| <i>Cylindropuntia echinocarpa</i>                     | silver cholla         |
| var. <i>rosulata</i>                                  |                       |
| <i>Opuntia basilaris</i> var. <i>basilaris</i>        | beavertail cactus     |
| <b>Chenopodiaceae</b>                                 |                       |
| <i>Atriplex canescens</i> var. <i>canescens</i>       | fourwing saltbush     |
| <i>Atriplex confertifolia</i>                         | shadscale             |



## APPENDIX A

|  |                          |
|--|--------------------------|
| <i>Atriplex polycarpa</i>                        | allscale                 |
| <i>Atriplex serenana</i> var. <i>serenana</i>    | bractscale               |
| <i>Atriplex torreyi</i> var. <i>torreyi</i>      | Torrey's saltbush        |
| <i>Bassia hyssopifolia</i>                       | hyssopleaf bassia        |
| <i>Chenopodium album</i>                         | Lamb's quarter           |
| <i>Grayia spinosa</i>                            | hop-sage                 |
| <i>Salsola paulsenii</i>                         | barbwire Russian thistle |
| <i>Salsola tragus</i>                            | Russian thistle          |
| <i>Sarcobatus vermiculatus</i>                   | greasewood               |
| <i>Stutzia covillei</i>                          | arrowscale               |
| <b>Cleomaceae</b>                                |                          |
| <i>Cleomella obtusifolia</i>                     | mojave stinkweed         |
| <i>Peritoma lutea</i>                            | yellow bee plant         |
| <b>Convolvulaceae</b>                            |                          |
| <i>Cuscuta indecora</i> var. <i>indecora</i>     | bigseed dodder           |
| <b>Elaeagnaceae</b>                              |                          |
| <i>Elaeagnus angustifolia</i>                    | Russian olive            |
| <b>Fabaceae</b>                                  |                          |
| <i>Psoralea argemone</i> var. <i>minutifolia</i> | indigo bush              |
| <i>Psoralea polydenia</i>                        | dotted dalea             |
| <b>Geraniaceae</b>                               |                          |
| <i>Erodium cicutarium</i>                        | red-stemmed filaree      |
| <b>Lamiaceae</b>                                 |                          |
| <i>Salvia columbariae</i>                        | chia                     |
| <b>Loasaceae</b>                                 |                          |

## APPENDIX A

|   |                           |
|---|---------------------------|
| <i>Mentzelia albicaulis</i>                               | whitestem blazing star    |
| <b>Malvaceae</b>  |                           |
| <i>Sphaeralcea ambigua</i> var. <i>ambigua</i>            | globe mallow              |
| <b>Montiaceae</b>   |                           |
| <i>Calyptridium monandrum</i>                             | sand cress                |
| <b>Oleaceae</b>   |                           |
| <i>Menondora spinescens</i> var. <i>spinescens</i>        | Spiny menondora           |
| <b>Onagraceae</b>   |                           |
| <i>Eremothera boothii</i> ssp. <i>desertorum</i>          | desert shredding primrose |
| <b>Papaveraceae</b>                                       |                           |
| <i>Argemone munita</i>                                    | flatbud pricklypoppy      |
| <i>Eschscholzia minutiflora</i> ssp. <i>twisselmannii</i> | little gold poppy         |
| <b>Polemoniaceae</b>                                      |                           |
| <i>Aliciella monoensis</i>                                | Mono Lake aliciella       |
| <i>Eriastrum wilcoxii</i>                                 | Wilcox's woollystar       |
| <i>Gilia sinuate</i>                                      | cinder gilia              |
| <i>Loeseliastrum matthewsii</i>                           | desert calico             |
| <b>Polygonaceae</b>                                       |                           |
| <i>Centrostegia thurberi</i>                              | Thurber's spineflower     |
| <i>Eriogonum ampullacea</i>                               | Mono buckwheat            |
| <i>Eriogonum brachyanthum</i>                             | yellow buckwheat          |
| <i>Eriogonum nidularium</i>                               | birdnest buckwheat        |
| <i>Oxytheca dendroidea</i> ssp. <i>dendroidea</i>         | narrowleaf oxytheca       |
| <b>Ranunculaceae</b>                                      |                           |
| <i>Delphinium parishii</i> ssp. <i>parishii</i>           | Parish's larkspur         |

## APPENDIX A

### *Salicaceae*

*Salix exigua* narrow-leaved willow

### *Rosaceae*

*Prunus tridentate* var. *glandulosa* bitterbrush

### *Cyperaceae*

*Carex* sp.<sup>[1]</sup><sub>[SEP]</sub> sedge

### *Juncaceae*

*Juncus mexicanus* Mexican rush

### *Poaceae*

*Bromus madritensis* ssp. *rubens* red brome

*Bromus tectorum* cheat grass

*Distichlis spicata* saltgrass

*Elymus cinereus* Great Basin wildrye

*Schismus arabicus* Mediterranean barley

*Sporobolus airoides* alkali sacaton

*Stipa hymenoides* sand ricegrass

*Stipa speciosa* desert needlegrass

## APPENDIX B

### APPENDIX B

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#### Photos

## APPENDIX B



View of big sagebrush (*Artemisia tridentata*).



View of Pinyon rockcress (*Boechea dispar*).



View of Inyo County star-tulip (*Calochortus excavatus*).



View of Wheeler's dune broom (*Chaetadelpha wheeleri*).



View of fiddleleaf hawksbeard (*Crepis rucinata*).



View of globose cymopterus (*Cymopterus globosus*).

## APPENDIX B



View of Inyo phacelia (*Phacelia inyoensis*).



View of Parish's popcornflower (*Plagiobothrys parishii*).



View of Great basin rabbitbrush (*Ericameria nauseosa*)



View of alkali ivesia (*Ivesia kingii* var. *kingii*).



View of greasewood (*Sarcobatus vermiculatus*).



View of Mojave sea-blite (*Suaeda nigra*).

## APPENDIX B



View of golden violet (*Viola aurea*).

## Appendix D

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### **Correspondence with Native Americans**



# Mono County Community Development Department

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
[commdev@mono.ca.gov](mailto:commdev@mono.ca.gov)

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 12, 2020

Benton Paiute Reservation  
Attention: Billie Saulque  
25669 Hwy 6 PMB I  
Benton, CA 93512

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Saulque,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

State planning law and Senate Bill 18 (SB 18) requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan or designating land as open space.

Tribal participation is very important in the local planning process. Therefore, the purpose of this letter is to invite your participation and ensure the opportunity to conduct consultations in order to preserve, or mitigate impacts to, cultural places located on land within Mono County's jurisdiction that may be affected by these proposed General Plan amendments.

By law, **tribes have 90 days from the date of receipt of this letter to request consultation.** Recognizing that this letter is being sent on or before June 13, 2020, and allowing time for mailing, **your response must be received no later than September 11, 2020.**

### **Meeting Dates & CEQA**

A public hearing before the Planning Commission on this general plan amendment has not yet been scheduled. Following the Planning Commission meeting the project may then proceed to a public hearing by the Mono County Board of Supervisors in September 2020.

As authorized by Gov. Newsom's Executive Orders, N-25-20 and N-29-20, the meetings will be accessible remotely by livecast with Commissioners/Supervisors attending from separate remote locations. There is no physical meeting location. This altered format is in observance of recent recommendations by local officials that certain precautions be taken, including social distancing, to address the threat of COVID-19. Digital meeting information, including the telephone number and

website where members of the public shall have the right to observe and offer comment, will be provided with the agendas of each meeting.

Planning Commission meetings are anticipated to begin at 10:00 am, and Board of Supervisors meetings are anticipated to begin at 9:00 am on the first three Tuesdays of each month. Meeting agendas are posted online on the Planning Commission and Board of Supervisors webpages and can be received via e-mail by subscribing to the Planning Commission and Board of Supervisors e-mail lists at the following links: <https://monocounty.ca.gov/planning-commission> and <https://monocounty.ca.gov/bos>.

We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Benton Paiute Reservation. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

PO Box 347  
Mammoth Lakes, CA 93546  
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760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 12, 2020

Big Pine Band of Owens Valley THPO  
Attention: Bill Helmer  
PO Box 700  
Big Pine, CA 93513

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Helmer,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

State planning law and Senate Bill 18 (SB 18) requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan or designating land as open space.

Tribal participation is very important in the local planning process. Therefore, the purpose of this letter is to invite your participation and ensure the opportunity to conduct consultations in order to preserve, or mitigate impacts to, cultural places located on land within Mono County's jurisdiction that may be affected by these proposed General Plan amendments.

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### **Meeting Dates & CEQA**

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website where members of the public shall have the right to observe and offer comment, will be provided with the agendas of each meeting.

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Big Pine Band of Owens Valley THPO. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

PO Box 347  
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PO Box 8  
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760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 12, 2020

Big Pine Paiute Tribe of the Owens Valley  
Attention: Jacqueline "Danelle" Gutierrez  
PO Box 700  
Big Pine, CA 93513

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Ms. Gutierrez,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

State planning law and Senate Bill 18 (SB 18) requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan or designating land as open space.

Tribal participation is very important in the local planning process. Therefore, the purpose of this letter is to invite your participation and ensure the opportunity to conduct consultations in order to preserve, or mitigate impacts to, cultural places located on land within Mono County's jurisdiction that may be affected by these proposed General Plan amendments.

By law, **tribes have 90 days from the date of receipt of this letter to request consultation.** Recognizing that this letter is being sent on or before June 13, 2020, and allowing time for mailing, **your response must be received no later than September 11, 2020.**

### **Meeting Dates & CEQA**

A public hearing before the Planning Commission on this general plan amendment has not yet been scheduled. Following the Planning Commission meeting the project may then proceed to a public hearing by the Mono County Board of Supervisors in September 2020.

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Big Pine Paiute Tribe of the Owens Valley. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
[commdev@mono.ca.gov](mailto:commdev@mono.ca.gov)

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 12, 2020

Big Pine Paiute Tribe of the Owens Valley  
Attention: Genevieve Jones  
PO Box 700  
Big Pine, CA 93513

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Ms. Jones,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Big Pine Paiute Tribe of the Owens Valley. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)



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June 12, 2020

Bishop Paiute Tribe  
Attention: Raymond Andrews  
50 Tu Su Lane  
Bishop, CA 93514

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Andrews,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Bishop Paiute Tribe. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

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June 12, 2020

Bishop Paiute Tribe  
Attention: Mervin Hess  
50 North Tu Su Lane  
Bishop, CA 93514

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Hess,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Bishop Paiute Tribe. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

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June 12, 2020

Bishop Paiute Tribe  
Attention: Gerald Howard  
50 North Tu Su Lane  
Bishop, CA 93514

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Howard,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

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June 12, 2020

Bridgeport Indian Colony  
Attention: John L. Glazier  
PO Box 37  
Bridgeport, CA 93517

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Glazier,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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### **Meeting Dates & CEQA**

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Bridgeport Indian Colony. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)



# Mono County Community Development Department

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[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

June 12, 2020

Kern Valley Indian Council  
Attention: Robert Robinson  
PO Box 401  
Weldon, CA 93283

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Robinson,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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### **Meeting Dates & CEQA**

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Kern Valley Indian Council. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

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June 12, 2020

Walker River Paiute Tribe  
Attention: Melanie McFalls  
PO Box 220  
Schurz, NV 89427

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Ms. McFalls,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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### **Meeting Dates & CEQA**

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Walker River Paiute Tribe. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

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June 12, 2020

Washoe Tribe of Nevada and California  
Attention: Darrell Kizer  
919 Hwy 395 South  
Gardnerville, NV 89410

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Kizer,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

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We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Washoe Tribe of Nevada and California. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

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June 12, 2020

Washoe Tribe of Nevada and California  
Attention: Neil Mortimer  
919 Hwy 395 South  
Gardnerville, NV 89410

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Mr. Mortimer,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Agriculture. The properties are APN 025-020-013 and 025-040-002, and are owned by one party. The land use designation change will allow the property owner to apply for a Conditional Use Permit to conduct outdoor & mixed-light cannabis cultivation, less 25,000 square feet, on APN 025-020-013.

State planning law and Senate Bill 18 (SB 18) requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan or designating land as open space.

Tribal participation is very important in the local planning process. Therefore, the purpose of this letter is to invite your participation and ensure the opportunity to conduct consultations in order to preserve, or mitigate impacts to, cultural places located on land within Mono County's jurisdiction that may be affected by these proposed General Plan amendments.

By law, **tribes have 90 days from the date of receipt of this letter to request consultation.** Recognizing that this letter is being sent on or before June 13, 2020, and allowing time for mailing, **your response must be received no later than September 11, 2020.**

### **Meeting Dates & CEQA**

A public hearing before the Planning Commission on this general plan amendment has not yet been scheduled. Following the Planning Commission meeting the project may then proceed to a public hearing by the Mono County Board of Supervisors in September 2020.

As authorized by Gov. Newsom's Executive Orders, N-25-20 and N-29-20, the meetings will be accessible remotely by livecast with Commissioners/Supervisors attending from separate remote locations. There is no physical meeting location. This altered format is in observance of recent recommendations by local officials that certain precautions be taken, including social distancing, to address the threat of COVID-19. Digital meeting information, including the telephone number and

website where members of the public shall have the right to observe and offer comment, will be provided with the agendas of each meeting.

Planning Commission meetings are anticipated to begin at 10:00 am, and Board of Supervisors meetings are anticipated to begin at 9:00 am on the first three Tuesdays of each month. Meeting agendas are posted online on the Planning Commission and Board of Supervisors webpages and can be received via e-mail by subscribing to the Planning Commission and Board of Supervisors e-mail lists at the following links: <https://monocounty.ca.gov/planning-commission> and <https://monocounty.ca.gov/bos>.

We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Washoe Tribe of Nevada and California. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)



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Lee Vining, CA 93541



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PS Form 3811, July 2015 PSN 7530-02-000-9053

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James Rambeau  
 P.O. Box 700  
 Big Pine CA 93513



9590 9402 5757 0003 9173 78

2. Article Number (Transfer from service label)

7019 2280 0002 1808 5153

PS Form 3811, July 2015 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Vincent Moore*

- Agent
- Addressee

B. Received by (Printed Name)

*Vincent Moore*

C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

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| <p>1. Article Addressed to:</p> <p><i>Big Pine Paiute Tribe of Owens Valley</i><br/> <i>Sally Manning</i><br/> <i>P.O. Box 700</i><br/> <i>Big Pine, CA 93513</i></p>  <p>9590 9402 5757 0003 9173 92</p> | <p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes<br/>         If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table> | <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® | <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ | <input checked="" type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery | <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ | <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery | <input type="checkbox"/> Insured Mail |  | <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) |  |
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| 1. Article Addressed to:<br><br><i>Allen Summers</i><br><i>50 Tu Su Lane</i><br><i>Bishop CA 93514</i>   | B. Received by (Printed Name)<br><i>J. Williams</i>  | C. Date of Delivery<br><i>5/28/21</i> |  |   |  |   |   |  |   |   |  |  |  |   |                                       |  |  |  |
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| <input type="checkbox"/> Return Receipt (hardcopy)  | \$ _____   |          |  |          |   |          |   |          |  |          |  |
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| PS Form 3800, April 2015 PSN 7530-02-000-9047 <span style="float: right;">See Reverse for Instructions</span>   |  |          |  |          |   |          |   |          |  |          |  |

# Mono County Community Development Department

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
[commdev@mono.ca.gov](mailto:commdev@mono.ca.gov)

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

May 15, 2021

«Tribe\_Name»  
Attention: «Attn»  
«Email»

**RE: AB 52 NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN  
AMENDMENT AND CONDITIONAL USE PERMIT, APOGEE FAMRS**

Dear «Dear»,

As lead agency, the Mono County Community Development Department (the County) is preparing a Focused EIR to analyze potential impacts associated with approval of a proposed General Plan Amendment and Condition Use Permit. The Project is to change the land use designation of two properties south of Benton, CA, from Rural Residential to Agriculture, and a Conditional Use Permit for a commercial cannabis cultivation and whole-sale distribution. Cannabis cultivation will occur within three mixed-light greenhouses (a combination of artificial and natural light) and not exceed 8,640 square feet. The properties are APN 025-020-013 and 025-040-002 and are owned by one party. Proposed development on APN 025-020-013 includes improving the dirt access road to current driveway standards, development of two standard and one handicap parking spaces, a 320 square-foot storage house for septic system and water tank, a 32-square-foot well pump house, construction of three 2,880-square-foot green-houses, and construction of a 1,800-square-foot processing facility building. No development is proposed on APN 025-040-002 at this time.

Tribal participation is very important in the local planning process, and we are sending this letter to the Washoe Tribe of California and Nevada to comply with AB 52. Under AB 52, tribes have 30 days to request consultation. In keeping with this timeframe, please send us your request by May 28, 2018 for consultation as requested under AB 52.

The project proposal is described more fully in the attached Notice of Preparation, and within the Initial Study that has been posted online (. The Draft Subsequent EIR is currently in preparation and is expected to be ready for public review and comment late in the summer of 2018. No hearings have been scheduled, and no hearings or public meetings are expected until after the public review period ends later this year.

To respond, please contact Michael Draper, Planning Analyst, Mono County Community Development Department, at 760.924.1805 or [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov). We look forward to receiving your reply and any information you are able to share and would welcome the

opportunity to meet with you and other members of the Washoe Tribe of California and Nevada.  
Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

Attachments:

1. Notice of Preparation
2. Initial Study checklist

**NOTICE OF PREPARATION  
OF A FOCUSED ENVIRONMENTAL IMPACT REPORT  
FOR THE APOGEE FARMS GENERAL PLAN AMENDMENT  
AND CANNABIS FACILITY PROJECT**



**LEAD AGENCY: Mono County Community Development Department  
ADDRESS: P.O. Box 347 Mammoth Lakes, California 93546  
COUNTY CONTACT: Michael Draper 760.924.1805**

**NOP ISSUED: May 15, 2021**

**NOP COMMENTS DUE BY: June 14, 2021**

**SCOPING MEETING: June 1, 2021 ♦ 4:30-6:00 pm ♦ Web-based Meeting**

---

**A. NOP CONTENTS**

This Notice of Preparation (NOP) contains a section addressing the proposed project and forthcoming Focused Environmental Impact Report (Focused EIR). Table 1 below outlines the NOP contents and sections.

**Table 1 NOTICE OF PREPARATION CONTENTS**

- A. Purpose of Notice
- B. Public Access and Participation
- C. Public Scoping Meeting
- D. Project Information
- E. Project Location
- F. NOP Response Procedure
- G. NOP Contents
- H. Responsible Agencies & Approvals
- I. Alternatives and Cumulative Effects
- J. Environmental Effects

---

**A. PURPOSE OF NOTICE**

As Lead Agency, the Mono County Community Development Department ("the County") is planning to prepare a Focused EIR to analyze potential environmental

impacts associated with the proposed Apogee Farms General Plan Amendment and Cannabis Facility Project (project). The County has prepared an Initial Study (IS) to 1) review the discussion of environmental effects in the Mono County 2015 General Plan EIR to determine their adequacy for the project (California Environmental Quality Act [CEQA] Guidelines Section 15178(b), (c)); and 2) identify any potential new or additional project-specific significant environmental effects that were not analyzed in the 2015 General Plan EIR and any mitigation measures or alternatives that may avoid or mitigate the identified effects, if any, to a level of insignificance. The IS has identified the potential for significant environmental effects in certain resources areas; therefore, the County determined to prepare a Focused EIR for the project to satisfy the requirements of the CEQA (Public Resources Code §§ 21000 *et seq.*).

Consistent with CEQA Section 15082, the County has prepared this NOP to invite your comments on the scope and content of environmental information to be provided in the forthcoming Focused EIR. CEQA Section 15082 requires that the NOP be sent out as soon as the Lead Agency determines that an EIR is required. The purpose of the NOP is to notify agencies, organizations, and individuals that an EIR will be prepared, and to request input on the scope of the environmental analyses to be provided.

**Specifically, the County is requesting comments from interested agencies, organizations, and individuals on the following aspects of the project:**

- ▶ **Permits and Approvals:** Applicable permits and approvals that may be required from your agency and environmental review requirements associated with those approvals (please see NOP Section H);
- ▶ **Significant Issues and Thresholds of Significance:** Potentially significant effects to be examined and Significance Thresholds that should be used;
- ▶ **Alternatives:** Alternatives to the project that merit evaluation in the forthcoming Focused EIR (please see discussion in NOP Section I);
- ▶ **Related Projects:** Related projects or actions that should be considered in assessing cumulative effects;
- ▶ **Reference Materials:** Reference materials to review

for baseline conditions, evaluating impacts, and mitigation.

## **B. PUBLIC ACCESS & PARTICIPATION**

To optimize public access, the County will post project documents (e.g., the Initial Study Checklist) on the County website for review and download at <https://www.monocounty.ca.gov/planning/page/projects-under-review>. Hard-bound copies of project documents can also be obtained for a nominal charge to cover reproduction costs by contacting the Mono County Community Development Department (760.924.1800 or [commdev@mono.ca.gov](mailto:commdev@mono.ca.gov)). Agency and public comments and questions are welcomed throughout the environmental review process.

## **C. PUBLIC SCOPING MEETING**

The County will hold a scoping meeting for this Focused EIR on June 1, 2021 from 4:30-6:00 pm remotely (web-based) due to COVID-19 (as allowable by Executive Order N-25-20).

### **Link:**

<https://monocounty.zoom.us/j/97708919578?pwd=Y29mNnNoSkNtUWN0RTZwN1hIWWFoZz09>

**Meeting ID:** 977 0891 9578

**Password:** 02889

**Phone Number:** 1-669-900-6833

The scoping meeting will include a brief presentation about the project and CEQA review process, and participants will be encouraged to share suggestions and comments regarding scope and focus of the forthcoming Focused EIR.



#### **D. PROJECT INFORMATION**

The applicant, Apogee Farms, Inc., filed applications for a Mono County General Plan Amendment, Conditional Use Permit, and a Cannabis Operations Permit. The project first requires a General Plan Amendment to change the land use designation of two parcels (totaling 78.45 acres of land) from Rural Residential to Agriculture and then a Conditional Use Permit plus Cannabis Operations Permit to allow for indoor, mixed-light commercial cannabis cultivation of 8,640 square feet, and whole-sale distribution operations.

The project site is located approximately 2.5 miles south of Benton and west of Highway 6. The south property, APN 025-040-002, is undeveloped other than existing dirt roads crossing the property. No development is proposed for this property at this time.

The north property, APN 025-020-013, will contain the cannabis operation. Currently the property contains a well head on a concrete pad, shed, propane tank on a concrete pad, closed mine shaft, a 40-foot-long storage container, a concrete trailer pad, and dirt roads. The applicant has made no improvements since obtaining ownership. Proposed development includes improving the dirt access road to current driveway standards, development of two standard and one handicap parking spaces, a 320 square-foot storage house for septic system and water tank, a 32-square-foot well pump house, construction of three 2,880-square-foot green-houses, and construction of a 1,800-square-foot processing facility building.

The proposed General Plan Amendment would change the designated land use of the project parcels to Agriculture, which would allow new uses and activities on the project site consistent with the permitted uses for Agriculture, as defined in the Mono County 2015 General Plan (2015 General Plan).

Activities related to commercial cannabis cultivation and distribution are not allowed under the existing Rural Residential land use designation but are allowed with a Conditional Use Permit under the Agriculture land use designation.

A General Plan Amendment is required to revise the land use designation of the project site to a use that allows commercial cannabis cultivation and distribution activities. Table 2 outlines the permitted uses allowed under the existing Rural Residential land use and the proposed Agriculture land use. The Focused EIR will include focused evaluation of the effects of the allowed uses under the General Plan Amendment compared to existing conditions and the Rural Residential land use designation (Environmental Planning and Information Council v. County of El Dorado (1982) 131 Cal.App.3d 354; see also CEQA Guidelines Section 15125(e)).

The approval of the General Plan Amendment and proposed cannabis facility constitutes a project that is subject to review under CEQA 1970 (Public Resources Code, §§21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, §§15000 et. seq.).

**Table 2. PERMITTED USES UNDER THE EXISTING AND PROPOSED LAND USES**

| Rural Residential (RR-40) – Existing Land Use   | Agriculture (AG-40) – Proposed Land Use  |
|---|--|
| <ul style="list-style-type: none"> <li>• Single-family dwelling</li> <li>• Small-scale agriculture</li> <li>• Accessory buildings and uses</li> <li>• Animals and pets</li> <li>• Home occupations</li> <li>• Manufactured home used as single-family dwelling</li> <li>• Accessory Dwelling Unit (ADU)</li> <li>• Transitional and Supportive Housing</li> <li>• Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Agricultural uses, provided that such uses are proposed in conjunction with a bona fide agricultural operation, except those requiring a use permit</b></li> <li>• <b>Non-commercial composting facilities where the operation does not create a nuisance problem and has less than 100 cubic yards of material on site at any given time</b></li> <li>• Single-family dwelling</li> <li>• Manufactured home used as a single-family dwelling</li> <li>• Accessory buildings and uses</li> <li>• <b>Farm labor housing</b></li> <li>• <b>Stands for sale of agricultural products grown on the premises</b></li> <li>• Animals and pets</li> <li>• Home occupations</li> <li>• <b>Fisheries and game preserves</b></li> <li>• ADU</li> </ul> |

Note: **Bold** AG-40 uses are those uses that differ from the RR-40.

**E. PROJECT LOCATION**

The project site is located at 23555 Highway 6, approximately 2.5 miles south of the townsite of Benton. Exhibit 1 depicts the regional and local project vicinity, Exhibit 2 shows the existing conditions of the project site, and Exhibit 3 shows the proposed layout of the cannabis facility.

**F. NOP RESPONSE PROCEDURE**

Provide scoping comments by June 9, 2021 at 5:00 pm. Please include the name and telephone number of a contact person if follow up questions arise, and send your response to this NOP by e-mail, fax, or mail to:

**Mono County c/o Michael Draper  
P.O. BOX 347, Mammoth Lakes,  
California 93546  
Tel: 760.924.1805 Fax: 760.924.1801**

e-Mail: [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

**G. RESPONSIBLE AGENCIES & APPROVALS**

**LEAD AGENCY:** Mono County is the designated Lead Agency for the project. In order to implement the project, the County will be required to certify that the Final Focused EIR has been prepared in compliance with CEQA and approve the Mitigation, Monitoring, and Reporting Program.

**RESPONSIBLE AGENCIES:** In addition to the Lead Agency project approvals described above, other public agencies may require separate permits and approvals before the project can be implemented.

Table 3 provides a preliminary outline of discretionary approvals and actions associated with the project.

If any agency has additional jurisdiction or approval authority over lands and/or actions that may be impacted by the

forthcoming Focused EIR, please submit a comment specifying the agency authority.

**Table 3 LEAD, RESPONSIBLE & TRUSTEE AGENCIES**

**LEAD AGENCY:**

Mono County Community Development Department

- Certification of the Focused EIR
- Adoption of the Mitigation Program
- Approval of Conditional Use Permit
- Approval of Operations Permit

**RESPONSIBLE AGENCIES:**

Mono County Department of Environmental Health

- Approval of Septic Permit
- State Water Resources Control Board
- Approval of NPDES General Storm Water Permit
  - Review of Stormwater Pollution Prevention Program
- California Department of Food and Agriculture (CDFA)
- CalCannabis Cultivation division approval of State License

**TRUSTEE AGENCIES:**

California Department of Fish and Wildlife

- Focused EIR review and comment on botanical and wildlife resources in the project area

Office of Historic Preservation

- Focused EIR review and comment on historical resources in the project area

Native American Heritage Commission

- Focused EIR review and comment on tribal cultural resources in the project area

**DISCRETIONARY ACTIONS:** A key step in the initial environmental review is to delineate between activities and land uses that were approved in the Mono County 2015 General Plan EIR and the project elements that are subject to discretionary

approval. Table 4 provides a preliminary outline of the approved land uses and proposed project elements. Only the proposed project elements (shown in the right-most column) are subject to discretionary action as part of the project.

**Table 4. EXISTING, APPROVED & PROPOSED LAND USES AND ACREAGES**

| PARCEL | ACREAGE | EXISTING LAND USES | LAND USES APPROVED in 2015 EIR | LAND USES NOW PROPOSED  | NEW DISCRETIONARY ACTIONS  |
|--------|---------|--------------------|--------------------------------|---|--|
| 1      | 40.20   | Undeveloped        | Rural Residential-40           | <ul style="list-style-type: none"> <li>• Agriculture</li> <li>• Commercial Cannabis Operations</li> </ul> | <ul style="list-style-type: none"> <li>• Land Use Designation Change to Agriculture (AG)</li> <li>• Conditional Use Permit for Commercial Cannabis Cultivation &amp; Distribution Operations Permit</li> </ul> |
| 2      | 38.25   | Undeveloped        | Rural Residential-40           | <ul style="list-style-type: none"> <li>• None at this time</li> </ul>                                     | <ul style="list-style-type: none"> <li>• Land Use Designation Change to Agriculture (AG)</li> </ul>  |

## **H. ALTERNATIVES & CUMULATIVE EFFECTS**

The purpose of alternatives is to identify feasible ways to avoid or reduce significant impacts identified in the environmental review while meeting basic project objectives. The range of alternatives will therefore depend on findings in the Focused EIR, but at a minimum the Focused EIR will consider the mandatory 'No Project' alternative. Cumulative effects are defined as impacts that are created as a result of the project evaluated in the EIR together with other projects causing related impacts. The cumulative analysis relies heavily on the identification of other closely related past, present, and reasonably foreseeable probable future projects.

**You are invited to comment on the range of alternatives and on the list of projects to be analyzed in the cumulative analysis.**

### **I. ENVIRONMENTAL EFFECTS**

The County prepared an Initial Study checklist, pursuant to CEQA, to determine whether, based on substantial evidence, the adoption and implementation of the project may have a significant adverse effect on the environment.

Based on the analysis in the Initial Study checklist, the County will prepare a Focused EIR to evaluate potentially significant environmental effects of the project. The environment review in the Focused EIR will focus on the topics for which potentially significant impacts may occur as a

consequence of the project. The topics are listed below:

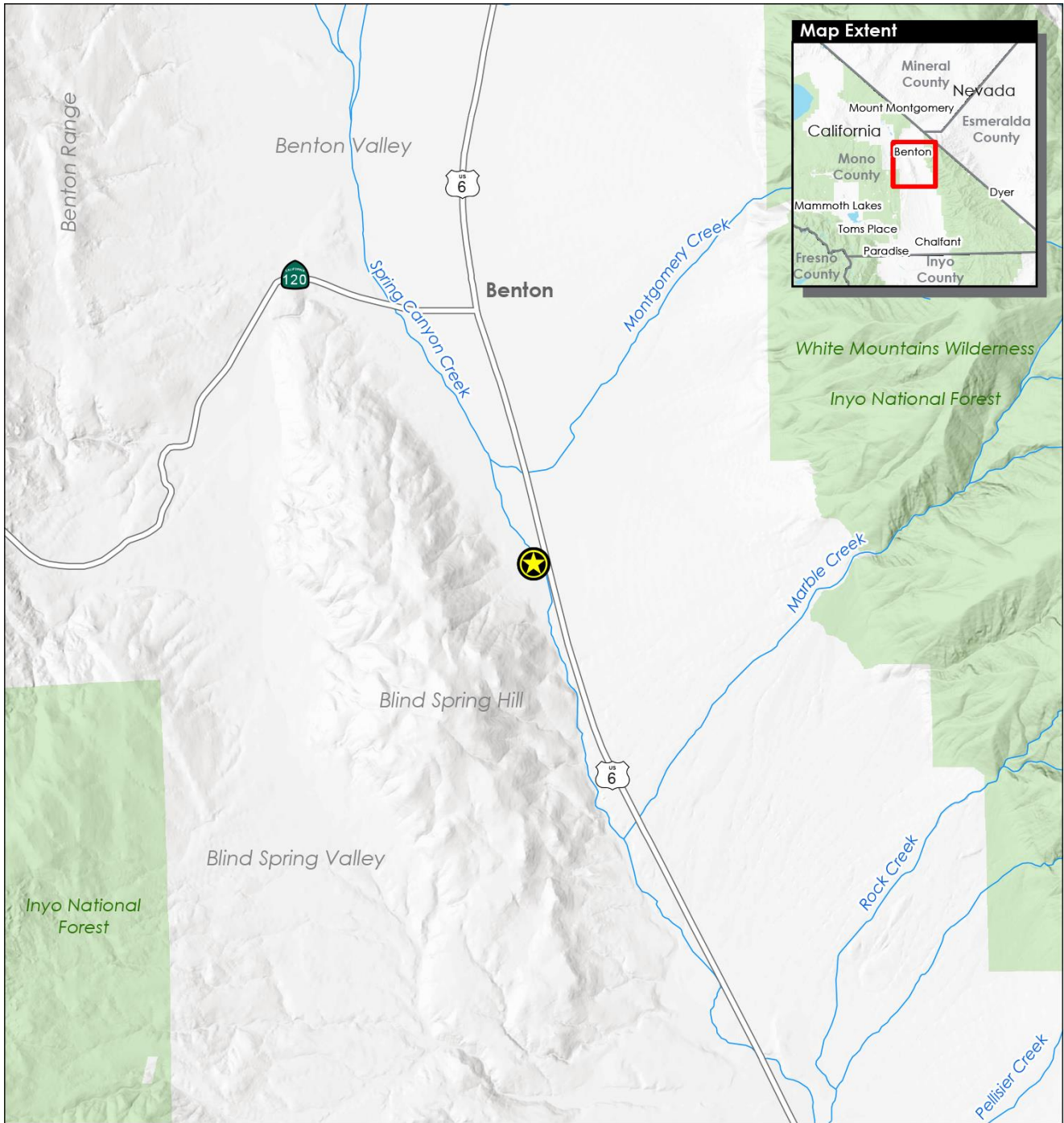
- ❑ **Air Quality and Greenhouse Gas Emissions:** Permitted uses allowable under the Agriculture land use designation could result in generation of significant air quality and greenhouse gas emissions that could impact the environment. The Focused EIR will evaluate the potential significant air quality and greenhouse gas emission impacts that could result from project implementation.
- ❑ **Cultural and Tribal Cultural Resources:** Allowable uses under the Agriculture land use designation could damage or destroy known or previously unknown cultural resources during ground disturbance and excavation. The Focused EIR will assess the potential effects of the project on cultural resources, including archaeological and tribal cultural resources.
- ❑ **Mitigation Measures:** The Focused EIR will identify any feasible mitigation measures that could avoid or reduce potential significant environmental impacts.

The Initial Study did not identify any potentially significant environmental effects of the project on aesthetics, biological resources, geology/soils, hydrology/water quality, noise, recreation, utilities/service systems, agriculture and forestry resources, land use/planning, population/housing, transportation, wildfire, energy, hazards & hazardous materials, or public services.

**The County seeks your comments on the proposed scope and focus of the analysis, as well as applicable thresholds of significance and key issues of particular**

**concern. Please include this information as part of your response to the NOP and/or your comments at the scoping meeting.**

# Exhibit 1 Regional Location



### Legend

Scale = 1:100,000



Project Site



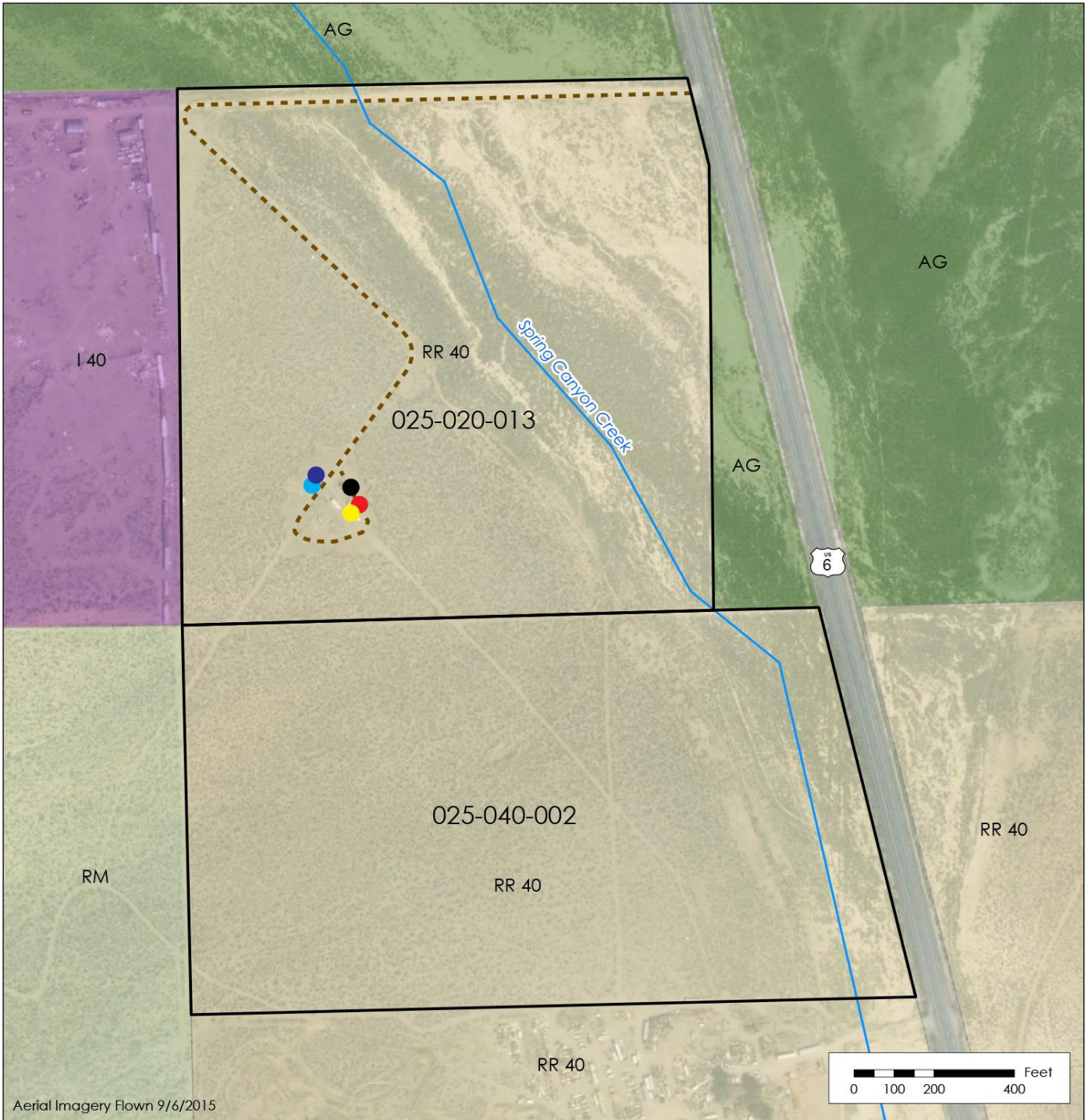
Forest Service Land



Creek



## Exhibit 2 Project Site Existing Conditions



### Legend

Scale: 1:5,000

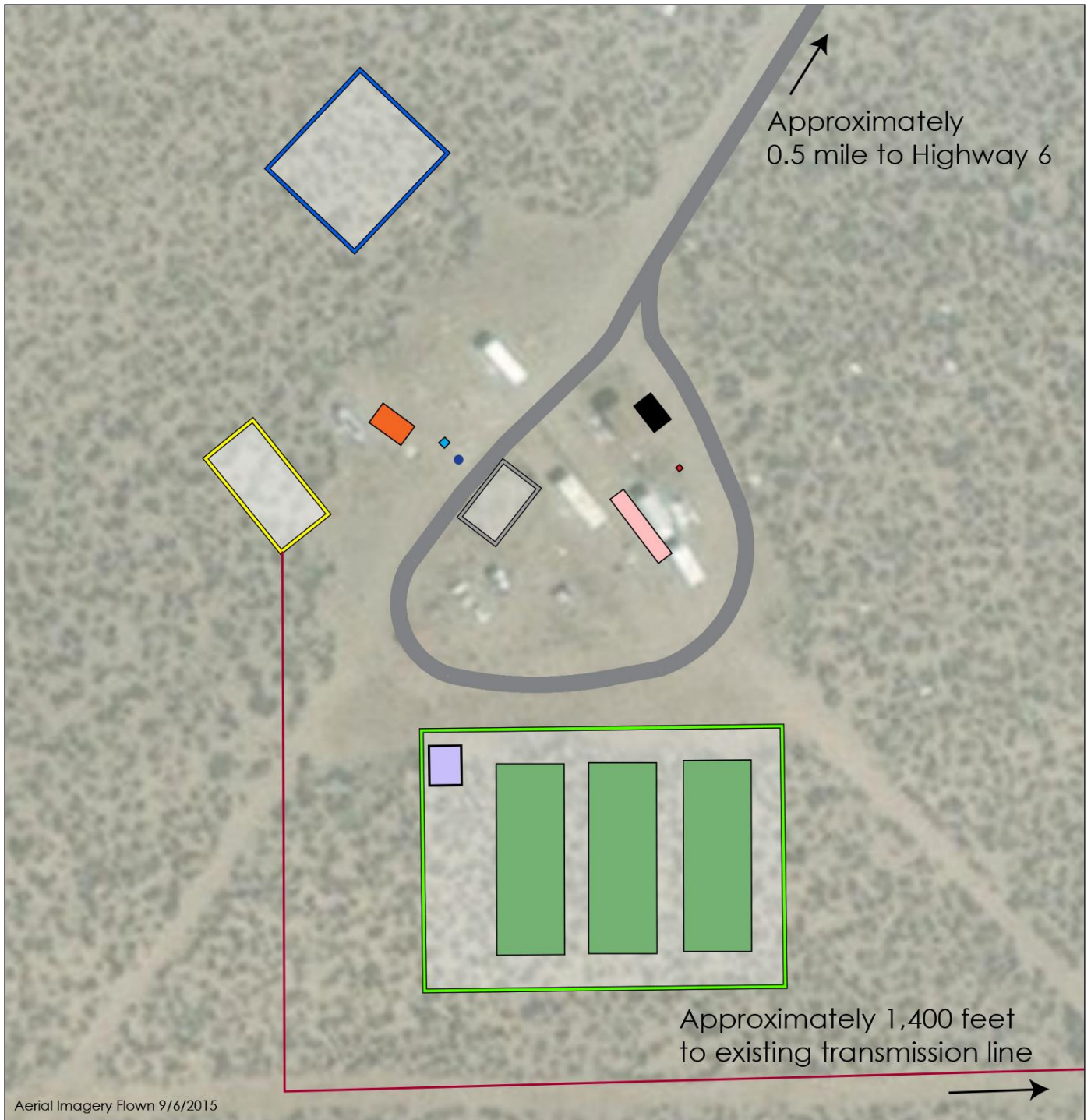


- Project Parcel with APN
- Existing Shed
- Existing Equipment Pad - Well
- Existing Equipment Pad - Propane
- Existing Housing Trailer
- Existing Storage Container
- Creek
- Existing Access Road

### Land Use Designations

- Agriculture (AG)
- Industrial (I)
- Resource Management (RM)
- Rural Residential (RR)

### Exhibit 3 Cannabis Facility Project Layout



Aerial Imagery Flown 9/6/2015

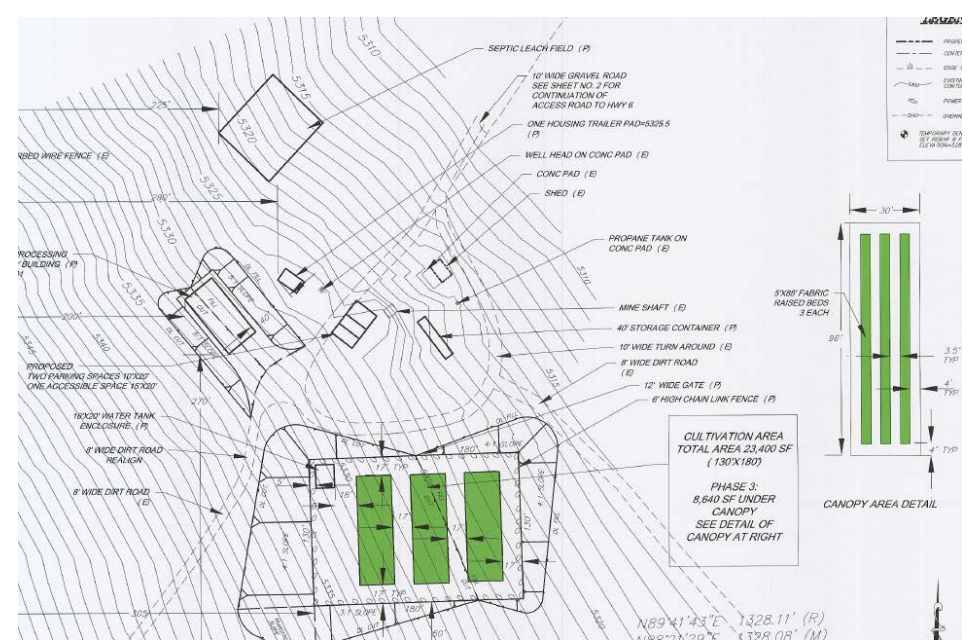
#### Legend

Scale: 1:1,000



- |                                       |                                       |  |
|---------------------------------------|---------------------------------------|--|
| Proposed Gravel Access Road           | Proposed Septic Leach Field           |  |
| Proposed Processing Facility Building | Proposed Cultivation Area Fencing     |  |
| Proposed Greenhouse                   | Existing Equipment Pad - Well         |  |
| Proposed Storage House                | Existing Equipment Pad - Propane Tank |  |
| Proposed Parking Lot                  | Existing Shed                         |  |
| Proposed Well Pump House              | Existing Housing Trailer              |  |
| Proposed Underground Power Line       | Existing Storage Container            |  |





# Mono County Apogee Farms General Plan Amendment and Conditional Use Permit Initial Study Checklist

May 2021

717 Market Street, Suite 650  
San Francisco, CA 94103  
650-373-1200  
[www.panoramaenv.com](http://www.panoramaenv.com)



# Mono County

## Apogee Farms General Plan Amendment and Conditional Use Permit

### Initial Study Checklist

**May 2021**

**Prepared for:**

Mono County Community Development Department  
Planning Division  
P.O. Box 347  
Mammoth Lakes, CA 93546

**Prepared by:**

Panorama Environmental, Inc.  
717 Market Street, Suite 400  
San Francisco, CA 94103  
650-373-1200  
Susanne.heim@panoramaenv.com

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# 1 Introduction

## 1.1 Introduction

Apogee Farms, Inc. (Apogee Farms) filed applications for a Mono County (Lead Agency) General Plan Amendment and a Cannabis Facility Project (project). The project requires a General Plan Amendment to change the land use designation of two parcels from Rural Residential to Agriculture, and a Conditional Use Permit to allow for commercial cannabis operations. The project is located approximately 2.5 miles south of Benton and west of United States Route 6 (US 6 or Highway 6).

Apogee Farms proposes to construct and operate a commercial cannabis facility on the northern project parcel. Mono County adopted cannabis regulations and a General Plan amendment in 2017. Activities related to commercial cannabis cultivation and distribution are not allowed under the existing Rural Residential designation on the project site, but are allowed with a Conditional Use Permit under other designations. A General Plan Amendment is required to revise the land use designation of the project site to a use that allows commercial cannabis activities. Mono County streamlining allows for processing of the re-designation of parcels to agricultural uses and discretionary Conditional Use Permit concurrently (General Plan Action 1.G.1.a.).

The proposed General Plan Amendment would re-designate the land use of the project parcels as Agriculture, which would permit new uses and activities on the project site consistent with the permitted uses for Agriculture defined in the Mono County 2015 General Plan (2015 General Plan). The assumption for the General Plan Amendment is that any of the permitted uses allowed under the Agriculture designation as defined in the 2015 General Plan could be conducted on the site once the General Plan Amendment is approved.

## 1.2 Environmental Review Process

The approval of the General Plan Amendment and proposed cannabis facility constitutes a project that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code, Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Section 15000 et. seq.). The Initial Study (IS) checklist has been prepared as part of the environmental review process needed to evaluate the potential environmental impacts of the General Plan Amendment and cannabis facility construction and operation proposed by Apogee Farms.

## 1 INTRODUCTION

The General Plan Amendment and Cannabis Facility are analyzed at a project-level in this IS to screen out environmental impacts that are less than significant. In accordance with CEQA Section 21093 and CEQA Guidelines Section 15152, this IS, as part of the Focused Environmental Impact Report (EIR), tiers from the certified Mono County 2015 General Plan EIR (SCH# 2014061029), which is specifically incorporated by reference into this document. Only the environmental impacts found not be sufficiently analyzed in the 2015 General Plan and could be significant are analyzed in the Focused EIR (CEQA Guidelines Section 15178(c).

CEQA Guidelines Section 15178 (c) states that a lead agency shall prepare a Focused EIR if the subsequent project may have a significant effect on the environmental and a mitigated negative declaration (pursuant to Section 15178 (b)) cannot be prepared.

1. The focused EIR shall incorporate by reference the Master EIR and analyze only the subsequent project's additional significant environmental effects and any new or additional mitigation measures or alternatives that were not identified and analyzed by the Master EIR. "Additional significant environmental effects" are those project-specific effects on the environment which were not addressed as significant in the Master EIR (State CEQA Guidelines Section 15178 (c) (1)).
2. A focused EIR need not examine those effects which the lead agency, prior to public release of the focused EIR, finds, on the basis of the initial study, related documents, and commitments from the proponent of a subsequent project, have been mitigated in one of the following manners (CEQA Guidelines Section 15178 (c) (2)):
  - a. Mitigated or avoided as a result of mitigation measures identified in the Master EIR which the lead agency will require as part of the approval of the subsequent project (CEQA Guidelines Section 15178 (b) (2) (A));
  - b. Examined at a sufficient level of detail in the Master EIR to enable those significant effects to be mitigated or avoided by specific revisions to the project, the imposition of conditions of approval, or by other means in connection with approval of the subsequent project (CEQA Guidelines Section 15178 (c) (2) (B));
  - c. The mitigation or avoidance is the responsibility of and within the jurisdiction of another public agency and is, or can and should be, undertaken by that agency (CEQA Guidelines Section 15178 (c) (2) (C)).
3. The lead agency's findings pursuant to subdivision (2) shall be included in the focused EIR prior to public release pursuant to Section 15087 (CEQA Guidelines Section 15178 (c) (3)).
4. A focused EIR prepared pursuant to this section shall analyze any significant environmental effects when (CEQA Guidelines Section 15178 (c) (4)):
  - a. Substantial new or additional information shows that the adverse environmental effect may be more significant than was described in the Master EIR; or
  - b. Substantial new or additional information shows that mitigation measures or alternatives which were previously determined to be infeasible are feasible and will

## 1 INTRODUCTION

avoid or reduce the significant effects of the subsequent project to a level of insignificance.

Given the project description and knowledge of the project site, the County has concluded that the project would result in a significant effect that was not previously disclosed in the 2015 General Plan EIR. The IS found new potentially significant impacts on cultural resources and tribal cultural resources, and from generation of air and greenhouse gas emissions. Therefore, a Focused EIR is required to analyze the new potentially significant impacts of the project.

## 1 INTRODUCTION

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## 2 Project Description

### 2.1 Project Title

Apogee Farms General Plan Amendment and Cannabis Facility Project (project)

### 2.2 Lead Agency Name and Address

Mono County Department of Community Development  
P.O. Box 347  
Mammoth Lakes, CA 93546

### 2.3 Contact Person and Phone Number

Michael Draper, Planning Analyst II  
(760) 924-1805  
mdraper@mono.ca.gov

### 2.4 Project Location

The project site is located in unincorporated area of Mono County, approximately 2.5 miles south of the town of Benton and west of Highway 6. Figure 2-1 and Figure 2-2 illustrate the regional and vicinity location of the project site. Two parcels comprise the 78.45-acre project site; a northern 40.20-acre parcel (APN 025-020-013), accessed by a dirt road, and a southern 38.25-acre parcel (APN 025-040-002).

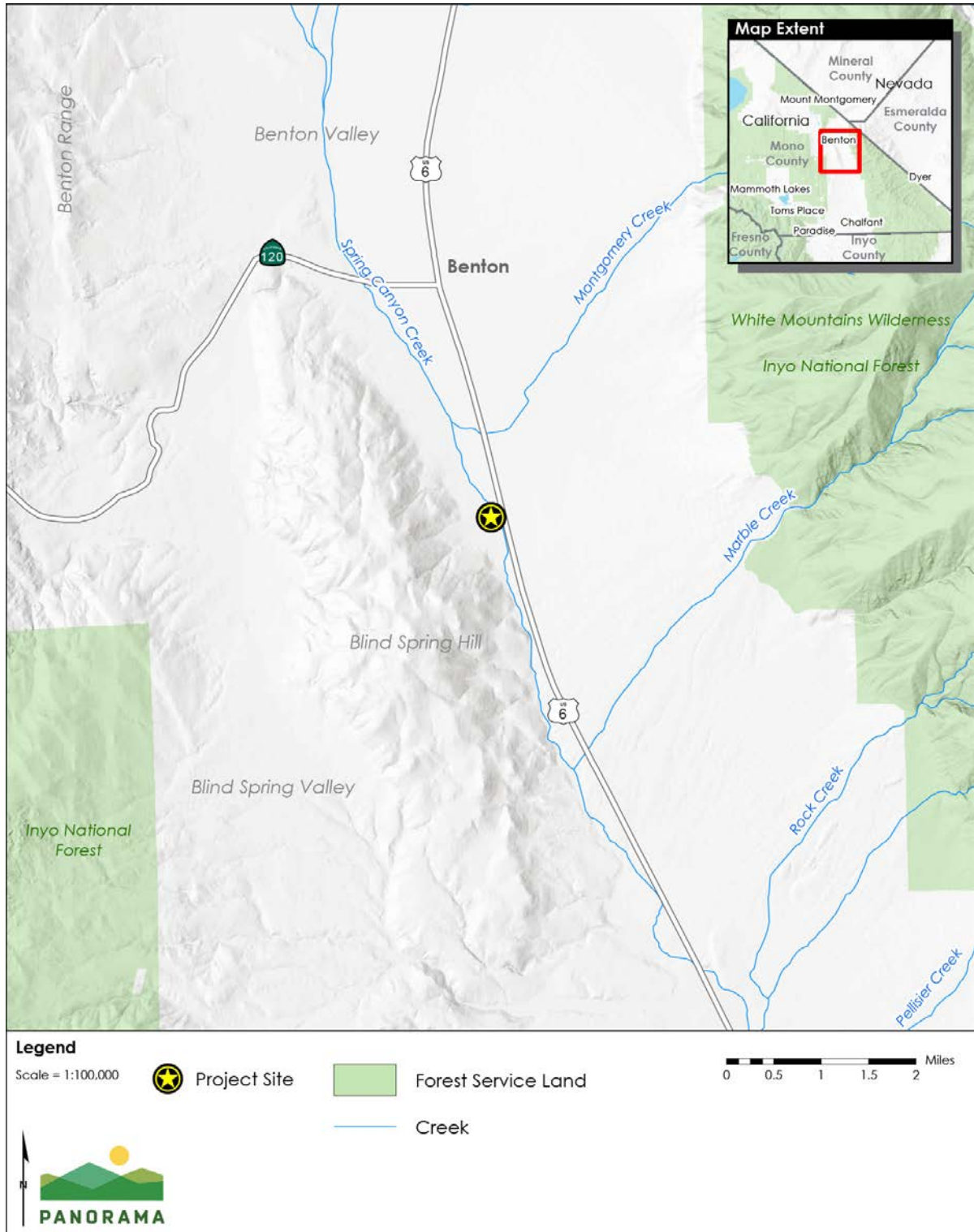
**Assessor's Parcel Numbers (APNs):** 025-020-013, 025-040-002

**Address:** 23555 Highway 6, Benton, CA 93512

**Latitude, Longitude:** 37.784047, -118.468509

## 2 PROJECT DESCRIPTION

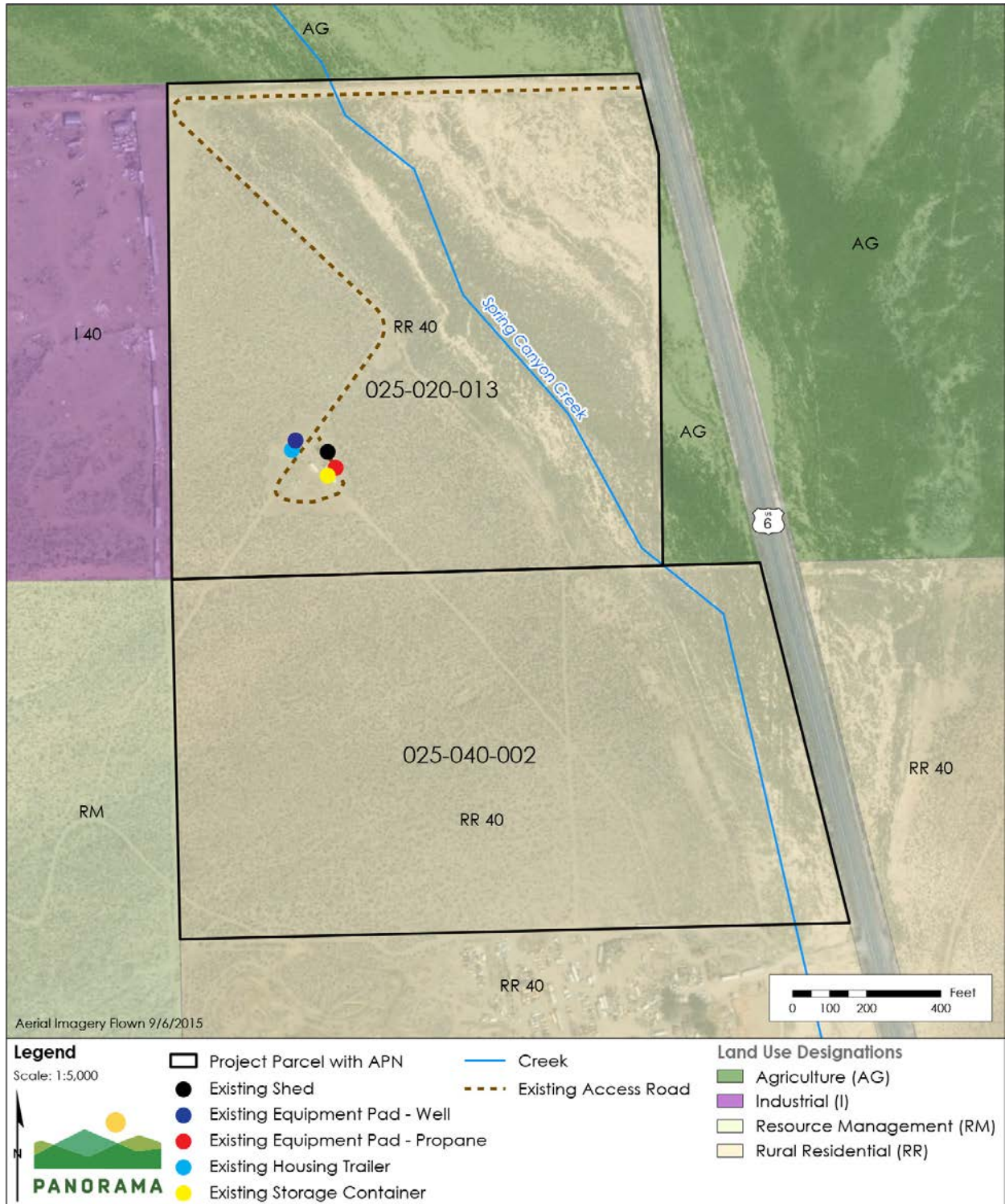
**Figure 2-1 Regional Location**



Sources: (USGS, 2019; Tele Atlas North America, Inc., 2019; USGS, 2019)

## 2 PROJECT DESCRIPTION

**Figure 2-2 Project Site**



Sources: (Mono County, 2019; Tele Atlas North America, Inc., 2019; USGS, 2019)

## 2 PROJECT DESCRIPTION

### 2.5 Land Use Designation and Surrounding Land Uses

The project site is located within the Benton area as defined in the General Plan. The land use designation for the project site is currently Rural Residential-40 acres (RR-40)<sup>1</sup>. The parcels adjacent to the project site are designated as Agriculture (AG), Industrial (I), Resource Management (RM), and Rural Residential (RR), as shown in Figure 2-2.

### 2.6 Access

The project site is accessed via an existing unpaved access road that extends from Highway 6 to the west, providing access to the adjacent parcel. An existing unpaved access road extends south to the proposed facilities located in the southwestern corner of the project site, as shown in Figure 2-2. Benton is located 2.5 miles to the north and the city of Bishop is located 32 miles to the south of the project site.

### 2.7 Project Elements

#### 2.7.1 General Plan Amendment and Permits

The project involves application of a General Plan Amendment and Conditional Use Permit to allow construction and operation of a commercial cannabis facility on the project site. The project site has an existing General Plan Land Use designation of rural residential. Commercial cannabis production necessitates a Conditional Use Permit and Cannabis Operation Permit, in accordance with the Mono County General Plan. Activities related to commercial cannabis cultivation and distribution are not allowed under the Rural Residential designation, but are allowed with a Conditional Use Permit under other designations. A General Plan Amendment is required to revise the land use designation of the project site to a use that allows commercial cannabis activities. The proposed General Plan Amendment would revise the land use designation from Rural Residential-40 acres to Agriculture-40 acres (AG-40), a land use that does allow commercial cannabis activities with approval of a Conditional Use Permit.

The change in land use designation from Rural Residential to Agriculture would allow for a range of new activities to occur on the site without any additional discretionary approval. Table 2-1 lists the permitted uses and activities allowed under the Agriculture land use designation compared to the existing Rural Residential designation. It is assumed that the newly permitted uses and activities could occur anywhere across the entire project site, once the project site is

---

<sup>1</sup> As of August 2, 2019, Mono County's zoning maps are superseded by the planning and land use maps contained in the General Plan and Specific Plans (Mono County, 2019).

## 2 PROJECT DESCRIPTION

designated Agriculture. These activities include tilling and growing crops (e.g., alfalfa), raising of beef cattle, operation of a small dairy, and/or construction of a single-family residence and accessory buildings (e.g., barn). The IS analyzes the effects of the General Plan Amendment compared to baseline conditions and allowable uses under the Rural Residential land use designation (*Environmental Planning and Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 354; see also CEQA Guidelines § 15125(e)).

**Table 2-1 Existing and Proposed Land Use Designations**

| Uses and Development Standards | Rural Residential (RR-40) – Existing Land Use   | Agriculture <sup>a</sup> (AG-40) – Proposed Land Use   |
|--------------------------------|---|--|
| Permitted Uses                 | <ul style="list-style-type: none"> <li>• Single-family dwelling</li> <li>• Small-scale agriculture</li> <li>• Accessory buildings and uses</li> <li>• Animals and pets</li> <li>• Home occupations</li> <li>• Manufactured home used as single-family dwelling</li> <li>• Accessory Dwelling Unit (ADU)</li> <li>• Transitional and Supportive Housing</li> <li>• Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act</li> </ul>   | <ul style="list-style-type: none"> <li>• <b>Agricultural uses<sup>b</sup>, provided that such uses are proposed in conjunction with a bona fide agricultural operation, except those requiring a use permit</b></li> <li>• <b>Non-commercial composting facilities where the operation does not create a nuisance problem and has less than 100 cubic yards of material on site at any given time</b></li> <li>• Single-family dwelling</li> <li>• Manufactured home used as a single-family dwelling<sup>c</sup></li> <li>• Accessory buildings<sup>d</sup> and uses</li> <li>• <b>Farm labor housing</b></li> <li>• <b>Stands for sale of agricultural products grown on the premises</b></li> <li>• Animals and pets</li> <li>• Home occupations</li> <li>• <b>Fisheries and game preserves</b></li> <li>• ADU</li> </ul> |
| Animals and Pets               | <ul style="list-style-type: none"> <li>• Minimum Lot Area Required: 10,000 square feet</li> <li>• Animal Units<sup>e</sup> Permitted:                             <ul style="list-style-type: none"> <li>– Less than 1 acre: one unit per 10,000 square feet of lot area with Director Review with notice</li> <li>– 1 to 10 acres: one unit per 10,000 square feet of lot area</li> <li>– Over 10 acres: no limit</li> </ul> </li> <li>• Restrictions: Except for movement on and off the property, animals shall not be kept, maintained or used in any other way, inside or</li> </ul> | <ul style="list-style-type: none"> <li>• Minimum Lot Area Required: 10,000 square feet</li> <li>• Animal Units<sup>e</sup> Permitted:                             <ul style="list-style-type: none"> <li>– 10 acres or less: one unit per 10,000 square feet of lot area</li> <li>– Over 10 acres: no limit</li> </ul> </li> </ul>   |

## 2 PROJECT DESCRIPTION

| Uses and Development Standards | Rural Residential (RR-40) – Existing Land Use  | Agriculture <sup>a</sup> (AG-40) – Proposed Land Use   |
|--------------------------------|--|--|
|                                | outside of any structure, within 40' of those portions of any structure used for human occupancy, assembly or habitation, other than the residence of the owner or keeper of such animals.   |  |
| Maximum Lot Coverage           | <ul style="list-style-type: none"> <li>• 40 percent</li> </ul>   | <ul style="list-style-type: none"> <li>• 40 percent</li> </ul>   |
| Minimum Setbacks               | <p><b>Buildings</b></p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 30 feet</li> <li>• Side: 30 feet</li> </ul> <p><b>Accessory Buildings Used as Barns or Stables</b></p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 30 feet</li> <li>• Side: 30 feet</li> </ul> | <p><b>Buildings</b></p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 50 feet</li> <li>• Side: 50 feet</li> </ul> <p><b>Accessory Buildings Used as Barns or Stables</b></p> <ul style="list-style-type: none"> <li>• Front: 50 feet</li> <li>• Rear: 30 feet</li> <li>• Side: 30 feet</li> </ul> |
| Building Density               | <ul style="list-style-type: none"> <li>• 1 dwelling unit per lot and an ADU</li> </ul>   | <ul style="list-style-type: none"> <li>• 1 dwelling unit per lot and an ADU</li> </ul>   |
| Population Density             | <ul style="list-style-type: none"> <li>• 5.02 persons per 5 acres or ~1 person per acre</li> </ul>   | <ul style="list-style-type: none"> <li>• 2 persons per acre</li> </ul>   |
| Maximum Building Height        | <ul style="list-style-type: none"> <li>• 35 feet</li> </ul>  | <ul style="list-style-type: none"> <li>• 35 feet</li> </ul>  |

**Notes:**

**Bold** AG-40 uses are those uses that differ from the RR-40.

- <sup>a</sup> "Agriculture" is the art, science or practice of farming, including the cultivation and harvesting of crops and rearing and management of livestock; tillage; husbandry; horticulture; aquaculture and forestry, the science and art of the production of plants and animals useful to man (Mono County, 2018).
- <sup>b</sup> "Agricultural uses" includes farm labor housing; agricultural sheds and warehouses; packing, processing, storage or sale of agricultural products and supplies; repair, maintenance, servicing, storage, rental or sale of agricultural machinery, implements and equipment; transportation of agricultural products, supplies and equipment together with the necessary maintenance, repair and service of trucks and equipment used therein.
- <sup>c</sup> Provided that the unit is fewer than 10 years old and meets the criteria set forth in Section 04.280. When there are two mobile homes on the same parcel, they must: 1) comply with the Accessory Dwelling Unit requirements; or 2) comply with State standards for a mobile-home park and obtain a use permit from the County.
- <sup>d</sup> Accessory buildings and uses customarily incidental to any of the permitted uses are permitted only when located on the same lot and constructed simultaneously with or subsequent to the main building, including barns, stables and other farm outbuildings and quarters for farm labor or other employees employed on the premises.
- <sup>e</sup> One animal unit equals:

## 2 PROJECT DESCRIPTION

| Uses and Development Standards | Rural Residential (RR-40) – Existing Land Use | Agriculture <sup>a</sup> (AG-40) – Proposed Land Use  |
|--------------------------------|---|---|
|                                |   | <ul style="list-style-type: none"><li>- 1 cow, bull, horse, mule, donkey or llama</li><li>- 2 pigs, goats, or sheep</li><li>- 6 geese, turkeys, or similar fowl</li><li>- 10 chickens, ducks, or game hens</li><li>- 12 fur-bearing animals including rabbits, and other fur-bearing size at maturity</li></ul> |

### 2.7.2 Commercial Cannabis Cultivation Facility

#### Buildings and Structures

The commercial cannabis facility would involve construction of a distribution facility within the southeast portion of the northern parcel shown on Figure 2-2. No development is proposed on the southern parcel. The project components and footprint of each component are summarized in Table 2-2. Existing equipment pads and access roads are also identified.

The project includes processing and distribution building (referred to as the “processing facility”) for commercial cannabis manufacturing, processing, and distribution activities. The processing facility would be a steel structure constructed on a concrete foundation with a maximum height of 20 feet. Three greenhouses would be constructed southeast of the processing facility within the cultivation area and would be used for cannabis cultivation. The greenhouse locations are shown on Figure 2-3. The greenhouse facility would be made of steel posts and beams with clear plastic walls and ceilings. The total area of cultivation would be less than 10,000 square feet within the fenced 23,400-square-foot cultivation area.

An approximately 320-square-foot storage house would be constructed northwest of the greenhouses within the cultivation area with a maximum height of 12 feet. The storage house would be constructed of treated wood with insulation on a concrete foundation. The storage house would be used for storage of water tanks, fertilizers, and other materials related to cannabis cultivation.

## 2 PROJECT DESCRIPTION

**Table 2-2 Project Site Components**

| Facility Components  | Footprint (square feet)                                   | Dimensions  |
|--|---|---|
| <b>Existing</b>  |   |   |
| Dirt Access Roads and Turnaround                               | 36,604  | 10 feet x 2,982 feet<br>8 feet x 598 feet   |
| Equipment Pads (Well and Propane Tank)                         | Well: 15.7 <sup>a</sup><br>Propane Tank: 5.7 <sup>a</sup> | --  |
| Shed   | 194.6   | --  |
| Storage Container  | 320   | 8 feet x 40 feet  |
| <b>Proposed</b>  |   |   |
| Graveling of Existing Access Roads and Turnaround <sup>b</sup> | 29,820  | 10 feet x 2,982 feet  |
| Processing Facility  | 1,800   | 30 feet x 60 feet   |
| Greenhouses (Three)  | 8,640   | 30 feet x 96 feet   |
| Storage House (Water Tank Enclosure)                           | 320   | 16 feet x 20 feet   |
| Well Pump House  | 32  | 4 feet x 8 feet   |
| Cultivation Area Fencing                                       | --  | 130 feet x 180 feet; 23,400 linear feet   |
| Parking Space  | 500   | 2 parking spaces: 10 feet x 20 feet<br>1 handicap-accessible space: 15 feet x 20 feet |
| Septic System (1,000-gallon tank)                              | 3,920 <sup>a</sup>  | Leach line <sup>c</sup> : 120 linear feet<br>or<br>Two leach lines: 60 linear feet    |

**Note:**

- <sup>a</sup> Estimated based on site plans.
- <sup>b</sup> The access roads and turnaround are not new, but would involve laying of gravel on the existing access roads and turnaround.
- <sup>c</sup> The width of a standard leach line trench ranges from 18 inches to 36 inches (Mono County Health Department, 2020).

### Roads and Parking

The commercial and employee access for the project site would be provided via an unpaved, dirt road extending from Highway 6 along the northern boundary of the project parcel. The extent of this dirt road is fenced and within an easement that supplies access to the parcel to the west. Vehicles would travel to the northwest corner and continue on the existing dirt road



## 2 PROJECT DESCRIPTION

through a locked gate in the fence that leads to the proposed cannabis facility in the southwest corner. The existing dirt access roads and turnaround would be covered in gravel for internal access to the processing facility and cultivation area. Driveways and access points would comply with all County fire safety standards to maximize entry and egress space for emergency vehicles.

A gravel parking area would be located on the east side of the processing facility and north side of the cultivation area. A total of three parking spaces, including one handicap-accessible parking spaces would be installed within the parking area. The access roads and parking area are shown on Figure 2-2.

### **Lighting, Signage, and Fencing**

Project lighting would consist of light-emitting diode (LED) greenhouse lighting and small LED lighting installed outside of the processing facility and storage house. Automatic curtains would be installed inside the greenhouses to prevent light leakage. All lighting would be cast downwards. No signage would be installed as part of the project. A 6-foot-tall chain link fence, with lockable gate, would be installed around the cultivation area. The fencing would include a screening material to act as a wind break and restrict visibility.

### **Utilities**

#### **Water**

A pump house would be constructed adjacent to the existing on-site well. The pump house would be up to 9 feet tall. Two water holding tanks (2,600 gallons each) would be installed inside the storage house for water storage.

#### **Wastewater and Sewage**

A 1,000-gallon septic tank with a leach line would be installed to the north of the processing facility.

#### **Energy Supply**

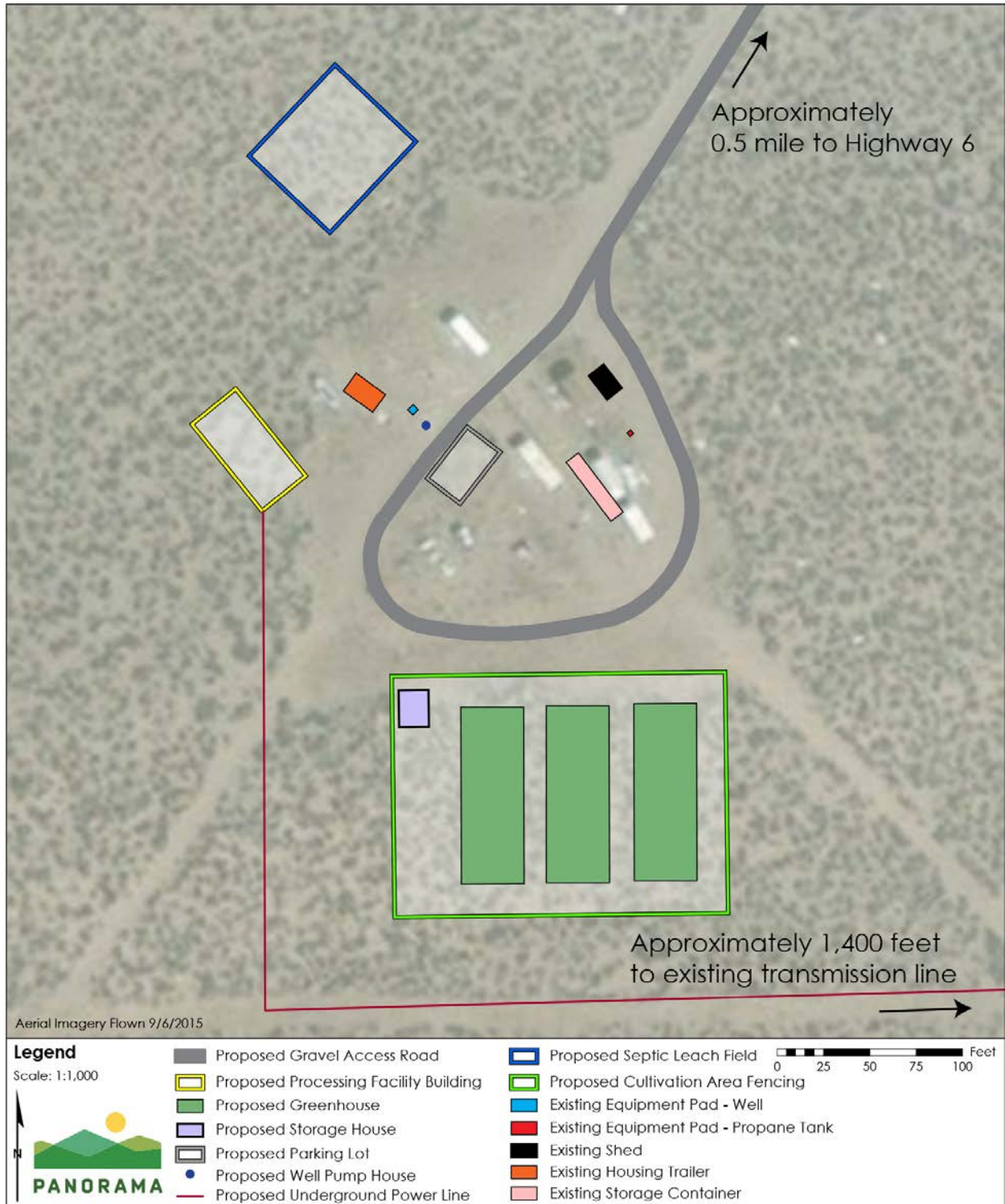
Power for the facility would be supplied by connecting to the existing distribution poles running parallel along the western edge of Highway 6. The power lines would be installed underground for approximately 1,600 feet between Highway 6 to reach the processing facility. A propane backup power generator would be installed west of the processing facility.

### **2.7.3 Construction**

The proposed sewer and energy supply infrastructure would be constructed on the project site prior to grading activities. Up to 0.54 acre of the site would be graded. The total disturbance area would be up to 1.33 acres. All excavated and graded material would be balanced on the project site. After completion of grading, the processing facility, storage house, and cultivation area would be constructed. Once the buildings are constructed or installed, gravel would be laid on the existing internal access routes and parking area.

## 2 PROJECT DESCRIPTION

**Figure 2-3 Project Site Components**



Sources: (Mono County, 2019; Tele Atlas North America, Inc., 2019; USGS, 2019)

## 2 PROJECT DESCRIPTION

Construction of the project would occur over approximately 6 to 8 months starting in 2020 at the earliest. A maximum crew size of 4 workers would be required during construction. A maximum of 16 one-way vehicle trips from construction equipment and vehicles would occur daily during construction. Water would be sourced from the on-site well for dust control. The power line, well pump house, and wastewater system would be installed first. The processing facility and cultivation area footprint and adjacent areas would then be graded to create a flat building surface. Following the grading activity, the processing facility, greenhouses, and storage house would be constructed. Perimeter fencing would be installed around the footprint of the cultivation area. Imported gravel would be spread on the existing dirt roads and turnaround.

The number and type of equipment proposed for the project construction are limited to the following:

- One backhoe
- One bulldozer
- One gradall
- One dump truck
- One forklift

### 2.7.4 Facility Operation

#### Cultivation and Distribution

Facility operations would include cannabis cultivation, manufacturing, and distribution. Cannabis cultivation includes mother plant cloning and indoor cultivation. Mother plants would be kept and cut in the processing facility. The cuttings would be transported to the greenhouses for replanting. The mature plants would then be taken to the processing facility for processing. The processing facility would house all drying, curing, extraction, and packaging activities. Water tanks, fertilizers, and equipment needed for cultivation would be stored in the storage house in the northwestern corn of the cultivation area.

#### Utilities

##### Water Supply and Use

Water for construction and operation activities would be sourced from the existing on-site well. Water would be used for dust control during construction, plant cultivation, and domestic uses. Daily water usage is estimated to be 600 gallons per day during operation.

##### Wastewater and Sewage

The sources of wastewater would include excess irrigation, domestic uses, and reverse osmosis (RO) filtration reject stream. Wastewater from excess irrigation would be reclaimed by running it through the RO system and reusing the filtered water for operation. A minimal amount of water is rejected as part of the RO system. The rejected water and domestic uses wastewater would be discharged to a septic system.

## 2 PROJECT DESCRIPTION

The project facility would be equipped with a septic system for effluent and discharge wastewater. The project applicant has contacted the Mono County Department of Environmental Health about septic regulations and would comply with requirements set forth by Mono County to ensure the approval of septic permit.

### **Waste Disposal**

Several distinct types of waste may be produced at the cultivation facility, including green waste, solid waste, and potentially hazardous waste such as cleaners or fertilizers. Green waste would be composted on the project site. Other solid waste and hazardous waste would be hauled to Benton Crossing Landfill.

### **Energy Supply**

Southern California Edison (SCE) would supply electric power to the project and the backup propane power generator would be used for emergency power.

### **Telecommunication**

AT&T Inc. would be the telecommunication service provider for the project.

### **Odor Management**

The greenhouses would be equipped with a ventilation system to control odors, humidity, and mold.

### **Personnel**

One existing person lives on the project site in a portable trailer, who would be an on-site employee at the cannabis facility. One to two employees would be hired seasonally during the harvests.

### **Traffic Generation**

Employees would generate an average of four one-way trips a day, Monday through Friday. Cannabis wholesale distribution during harvest would necessitate up to one round-trip per month.

## **2.8 Agency Jurisdiction and Approvals**

Mono County is the CEQA lead agency with discretionary review of the project. Other permits and approvals that would be required for the project are listed in Table 2-3.

**Table 2-3 Required Permits and Approvals**

| Permit or Approval     | Agency  | Function  |
|------------------------|---|---|
| Conditional Use Permit | Mono County Community Development Department, Planning Division | For commercial cannabis cultivation, processing, and distribution activities. |

## 2 PROJECT DESCRIPTION

| Permit or Approval           | Agency  | Function  |
|------------------------------|---|---|
| Cannabis Use Permit          | Mono County Community Development Department, Planning Division | For commercial cannabis cultivation, processing, and distribution activities. |
| Operations Permit            | Mono County Community Development Department, Planning Division | For operation of the commercial cannabis cultivation facility.                |
| Building Permit              | Mono County Community Development Department, Building Division | For construction of the cultivation facility.                                 |
| Septic Permit                | Mono County Department of Environmental Health                  | For septic system installation and sewage disposal.                           |
| Cannabis Cultivation License | CalCannabis Cultivation Licensing                               | License for cannabis cultivation in California                                |
| Construction General Permit  | State Water Resources Control Board                             | For surface disturbance greater than 1 acre.                                  |

## 2 PROJECT DESCRIPTION

*This page is intentionally left blank.*

### 3 Environmental Impact Checklist

This IS checklist includes an evaluation of impacts based on the CEQA Guidelines Appendix G Environmental Checklist. Each checklist item is explained in the discussion following the checklist and, if necessary, mitigation measures are provided to reduce impacts to a less-than-significant level. In accordance with CEQA, Mono County considered the whole of the action when evaluating impacts, including on- and off-site effects, direct and indirect effects, and effects from both construction and operation of any new development.

Each checklist criterion is marked to identify whether there is an environmental impact.

- *No Impact* indicates that there is no impact on the resource.
- *Less than Significant Impact* means that while there is some impact, the impact is below the threshold of significance, or existing regulations and legal standards will reduce these impacts to less than significant.
- *Less than Significant with GP EIR Mitigation Incorporated* indicates that impact is potentially significant, but the mitigation (e.g., 2015 General Plan policies and actions) included in the 2015 General Plan EIR would reduce the impact to a less-than-significant level.
- *Potentially Significant Impact* are impacts that exceed the defined standard of significance. An Environmental Impact Report is required to analyze the potentially significant impacts.

*Cumulative impacts* are discussed in Section 3.21, Mandatory Findings of Significance, of this IS. If a significant cumulative impact is identified, the project's contribution to the significant *cumulative impact* is considered.

### 3 ENVIRONMENTAL ANALYSIS

## 3.1 Aesthetics

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|---|--------------------------------|---|------------------------------|-------------------------------------|
| <b>1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:</b>   |                                |   |                              |                                     |
| a) Have a substantial adverse effect on a scenic vista?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                       | <input type="checkbox"/>     | <input type="checkbox"/>            |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?   | <input type="checkbox"/>       | <input checked="" type="checkbox"/>                       | <input type="checkbox"/>     | <input type="checkbox"/>            |

- a) **Would the project have a substantial adverse effect on a scenic vista? And,**
- b) **Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

### General Plan Amendment and Cannabis Facility

The project site is bounded by open space to the north and west, agricultural use to the east, and rural residential uses to the south. Highway 6 is located approximately 1,000 feet east of the project site but is not eligible for scenic highway status per Section 263 of the Streets and Highway Code (California Legislative Information, 2019). Highway 120 is the nearest scenic highway, designated by Mono County, located approximately 2.2 miles north of the project site. The nearest state scenic highway is US 395 located approximately 18 miles to the southwest (Mono County, 2015). No scenic resources are located on the project site.

The project site is not visible from any designated scenic highway due to the relative flat topography in the project vicinity. No existing or eligible state scenic highways or scenic roadways, or scenic vistas are located in the project vicinity that would afford a view of the site. Development of the project site under the General Plan Amendment and Cannabis Use Permit



### 3 ENVIRONMENTAL ANALYSIS

would not be visible from and would not impact a scenic vista or scenic highway. No impact would occur.

- c) **In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

#### **General Plan Amendment**

The General Plan Amendment would allow for development of a new single-family home, agricultural accessory buildings, or livestock operations that could be visible from public vantage points. Permitted uses or development under the Agriculture designation would be required to comply with the 2015 General Plan policies and actions and the Mono County Design Guidelines, according to Action 13.C.2.a of the 2015 General Plan. Implementation of General Plan Action 13.C.1.a and Action 13.C.2.a would avoid significant impacts on visual character or quality from the General Plan Amendment. The impact would be less than significant with 2015 General Plan EIR measures.

#### **Cannabis Facility**

The project would involve construction of a commercial cannabis cultivation facility. The proposed facilities would be one-story and would have a similar profile to structures on nearby parcels. The processing facility would be a steel structure, similar to nearby existing metal structures to the west. The cultivation area would be enclosed by a 6-foot-tall chain link fence and screening, which would help to diminish part of the facility from view. Furthermore, the proposed facilities would be set back from Highway 6 by over 1,000 feet and within middleground views, limiting visibility of the facility. The project would be generally consistent with the existing visual character of the industrial area to the west with the construction of metal buildings. The cannabis facilities would not substantially degrade the existing visual character of the site and its surroundings. The impact would be less than significant.

- d) **Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?**

#### **General Plan Amendment**

The density of structures in the project area is very low. Buildings located on nearby parcels contribute nominal sources of lighting and glare to the project area. New permitted development on the project site due to the change in land use designation to Agriculture, could include new sources of light and glare from facility lighting or metallic building materials and glass. The use of metallic building materials and glass would not create a substantial source of glare. Any permitted use under the Agriculture designation would be required to comply with 2015 General Plan Action 13.C.2.a., which requires exterior lighting to comply with the Dark Sky Regulations, and identifies requirements including shielding and preparation of outdoor lighting plans. Compliance with County lighting standards, consistent with the requirements of

### 3 ENVIRONMENTAL ANALYSIS

the 2015 General Plan, would reduce any potentially significant impacts on light and glare to less than significant with 2015 General Plan EIR measures.

#### Cannabis Facility

The cannabis facility would introduce new lighting in the area. The cultivation area would be fenced with chain link and screening material. Light deprivation curtains would be installed inside the greenhouse facility to eliminate light leakage into the surrounding environment. All proposed outdoor lighting would comply with the County’s Dark Sky Regulations. Lighting would be cast downward and shielded to eliminate unnecessary night sky illumination. The proposed lighting would not create a substantial source of new nighttime or daytime light.

The processing facility and storage house would be steel and wood structures. Steel cladding and framing on commercial buildings is typically brushed or treated in a manner that the material would not pose a source of glare. The chain link fence and screening around the cultivation area would minimize any potential glare from the greenhouses. The project would not create a new source of glare. The impact from the new lighting and glare would be less than significant.

## 3.2 Agriculture and Forestry Resources

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|---|--------------------------------|---|------------------------------|-------------------------------------|
| <b>2. 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. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</b> |                                |   |                              |                                     |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

### 3 ENVIRONMENTAL ANALYSIS

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|--|--------------------------------|---|------------------------------|-------------------------------------|
| 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))? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

- a) **Would the project 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?**

#### General Plan Amendment and Cannabis Facility

Mono County has not been mapped pursuant to the Farmland Mapping and Monitoring Program; therefore, neither the project site nor adjacent parcels are located on Prime Farmland or Farmland of Statewide. No impact would occur.

- b) **Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

#### General Plan Amendment and Cannabis Facility

Mono County's zoning maps are superseded by the land use maps contained in the 2015 General Plan (Mono County, 2019). The project site is currently designated Rural Residential. Adjacent parcels to the north and east are designated by the 2015 General Plan as Agriculture. As part of the project, the project site would be designated as Agriculture to accommodate the proposed cannabis facility. The Agriculture designation permits cannabis activities, including nursery, cultivation, processing, manufacturing, distribution, retail, and microbusiness. The project would involve cannabis cultivation and related allowable activities. Project activities and the designation to Agriculture would not conflict with any zoning for agricultural use. The project site is not under Williamson Act contract (Mono County, 2020). Parcels to the north and east of the project site, and east of Highway 6 are under Williamson Act contracts. The project would not conflict with offsite zoning for agricultural use any under Williamson Act Contract. No impact would occur.

### 3 ENVIRONMENTAL ANALYSIS

- c) **Would the project 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))?**

**General Plan Amendment and Cannabis Facility**

The project site and adjacent parcels are not zoned for forest land or timberland. The project would not conflict with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

- d) **Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

**General Plan Amendment and Cannabis Facility**

The project site and adjacent parcels are not zoned for forest land or contain forest. The project would not convert forest land to non-forest use. No impact would occur.

- e) **Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

**General Plan Amendment and Cannabis Facility**

No agricultural or farming operations currently occur on the project site. The adjacent parcel to the south has some livestock, but the project would not interfere with activities related to owning and raising livestock. The development and operation of the cannabis cultivation facility would be consistent with the proposed Agriculture designation for the project site. The potential for future agricultural operations, such as raising of livestock, would not interfere with any other agricultural operations on nearby parcels. The project would not convert agricultural land or uses to non-agricultural use. No impact would occur.

### 3.3 Air Quality

| Environmental Impacts   | Potentially Significant Impact      | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|---|-------------------------------------|---|------------------------------|-------------------------------------|
| <b>3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</b> |                                     |   |                              |                                     |
| a) Conflict with or obstruct implementation of the applicable air quality plan?   | <input type="checkbox"/>            | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input type="checkbox"/>            |

### 3 ENVIRONMENTAL ANALYSIS

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| c) Expose sensitive receptors to substantial pollutant concentrations?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### Overview

The project site is located within the Great Basin Valleys Air Basin (GBVAB) under the jurisdiction of the Great Basin Unified Air Pollution Control District (GBUAPCD). The state and federal air quality standards were developed to protect public health and welfare. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to result in nonattainment of air quality standards. Instead, a project’s individual emissions contribute to existing cumulative air quality impacts. If a project’s contribution to cumulative air quality impacts is considerable, the project’s impact on air quality would be considered significant. The area of the GBVAB that the project site is located within, is in state nonattainment for ozone and coarse particulate matter (PM<sub>10</sub>) (CARB, 2018). The project area is not located within an area that has an adopted State Implementation Plan (SIP)

**a) Would the project conflict with or obstruct implementation of the applicable air quality plan?**

#### General Plan Amendment and Cannabis Facility

No air quality plan has been adopted that applies to the project site (GBUAPCD, 2019). The project would not conflict with or obstruct implementation of an air quality plan. No impact would occur.

**b) Would the project 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?**

Implementation of the project would result in a potentially significant impact to air quality from future development under the General Plan Amendment. The project impact on criteria pollutants is evaluated in the Focused EIR.

### 3 ENVIRONMENTAL ANALYSIS

#### c) Would the project expose sensitive receptors to substantial pollutant concentrations?

##### **General Plan Amendment and Cannabis Facility**

The boundary of the southern parcel is approximately 230 feet from the nearest receptor, a single-family residence. The closest that any future development could occur would be 260 feet away from the residence<sup>2</sup>.

Future development and uses could include construction activities (e.g., construction of single-family residences or accessory buildings) or farming activities, which could involve use of heavy equipment. Diesel-powered construction and agricultural equipment emit toxic air contaminants in the form of diesel exhaust and particulate matter. The size of buildings that could be constructed without further environmental review would be fairly small, minimizing the duration and intensity of construction. Typical agricultural activities would not involve heavy equipment use in one location for an extended period of time. In addition, agricultural uses generally do not generate a significant amount of traffic that could result in increased automobile-related air pollutants.

Construction of the cannabis facility, which would be located approximately 1,475 feet from the nearest receptor, would occur for up to 8 months in 2021. During construction of the cannabis facility, equipment and vehicles would be used that emit toxic air pollutants. Equipment and trucks would be used minimally during operation of the cannabis facility.

On-site activities would comply with GBUAPCD rules, and the 2015 General Plan policies and actions described above, which require implementation of fugitive dust and particulate matter control measures. Equipment used for future construction or agricultural uses would be required to comply with federal and state engine emission standards (e.g., EPA phasing of nonroad compression ignition exhaust emission standards) for both new and existing equipment. Emissions standards are increasingly more stringent. Use of equipment complying with emission standards would minimize particulate matter and other toxic air contaminants. Due to the implementation of fugitive control measures, the impact on sensitive receptors from construction and operation of the cannabis facility or future development would be less than significant.

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<sup>2</sup> This distance is tabulated according to the distance to the southern parcel boundary plus the requirement for a minimum side setback for accessory buildings of 30 feet. The minimum setback for primary buildings is 50 feet.

### 3 ENVIRONMENTAL ANALYSIS

- d) **Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

#### General Plan Amendment

The project area is sparsely populated. The nearest residence is 230 feet to the south of the project site boundary and the next closest residence is 990 feet away to the south. The nearest residence to the north is nearly 0.75 mile away. Future uses under the Agriculture land use designation could involve construction and operation of agricultural facilities and activities. Some allowable activities, such as raising cattle or operating a dairy farm, could generate substantial odors. Due to the low density in the project area, although odors could be generated, a substantial number of people would not be subjected to objectionable odors. The impact would be less than significant.

#### Cannabis Facility

During construction of the cannabis facility, diesel exhaust from construction equipment and vehicles, as well as volatile organic compounds emitted during paving, would generate some odors, which could increase the odors temporarily in the immediate vicinity of the equipment operation. Operation of the proposed cannabis facility would generate some odors from on-site composting and cannabis cultivation activities. The proposed greenhouses would include a ventilation system, which would minimize odors. No residences are located within 1,000 feet to construction or operational activities. A substantial number of people would not be subjected to objectionable odors. Odor impacts would be less than significant.

### 3.4 Biological Resources

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| <b>4. BIOLOGICAL RESOURCES. Would the project:</b>   |                                |   |                                     |                          |
| 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? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 US Fish and Wildlife Service?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### 3 ENVIRONMENTAL ANALYSIS

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?       | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

#### Discussion

##### *Survey and Database Search*

On November 8, 2019 biologist Russell Kokx conducted a reconnaissance level survey of the approximately 80-acre project site. The reconnaissance survey documented the environmental settings including; vegetative communities, soils, elevations, habitats and conditions. This survey was conducted in order evaluate the potential for special-status species to occur. Biological database searches, including U.S. Fish and Wildlife Service (USFWS), California Natural Diversity Database (CNDDB), California Native Plant Society, and National Wetland Inventory, for the project vicinity were conducted in May 2019.

Biologist Russell Kokx conducted focused botanical surveys of the project stie on May 28 and June 17, 2020. Surveys were conducted during optimal conditions to determine whether special-status plant species or their habitats were present within the project site (Panorama Environmental, Inc., 2020).

##### *Natural Communities*

The project site encompasses three vegetative communities: Big Sagebrush Shrubland Alliance (*Artemisia tridentata*), Rubber Rabbit Brush Scrub Shrubland Alliance (*Ericameria nauseosus*) and several small inclusions of Greasewood Scrub Shrubland Alliance (*Sarcobatus vermiculatus*).



### 3 ENVIRONMENTAL ANALYSIS

The dominant perennial vegetation in Big Sagebrush Shrubland Alliance includes big sagebrush, rubber rabbit brush (*Ericameria nauseosus*), spiny hopsage (*Grayia spinosa*), Nevada joint fir (*Ephedra nevadensis*), spotted dalea (*Psoralea polydenius*), and catclaw horsebrush (*Tetradymia axillaris* var. *axillaris*). Understory plants were not surveyed within the growing season but identifiable species included; devil's lettuce (*Amsinckia tessellata*), Mono buckwheat (*Eriogonum ampullacea*), white-stem blazing star (*Mentzelia albicaulis*), purple root (*Cryptantha circumcissa*) and sticky lessingia (*Lessingia glandulifera*).

The Rubber Rabbit Brush Scrub Shrubland Alliance vegetation alliance occurs as the grade tapers off near the bottom of the valley, portions of which were historically flooded. This area still accumulates moisture and supports more facultative species. The soil is derived from the accumulation of minerals through springs, ponding and evaporation. The soil is light to white in color and very fine with a high alkalinity. The dominant perennials include dense stands of rubber rabbit brush with scattered Alkali sacaton (*Sporobolus airoides*) and big sagebrush. The understory is saltgrass (*Distichlis spicata*), five horn bassia (*Bassia hyssopifolia*), western nitrophila (*Nitrophila occidentalis*) and povertyweed (*Iva axillaris*).

The Greasewood Scrub Shrubland Alliance vegetation community occurs only in small highly alkaline inclusions at the bottom of alkali sinks in the project area. The dominant shrub is monotypic stands of greasewood. No annuals were observed in the understory however this habitat is well suited for potentially supporting several rare plant species in the spring. One sensitive vegetation community, greasewood scrub in alliance with *Suaeda nigra*, was observed in a small area within the greasewood scrub shrubland alliance within the project site during the focused botanical surveys (Kokx, 2021).

#### ***Wetlands***

The eastern portions of the project site occur at the base of Chalfant Valley. The soil is derived from the accumulation of minerals through springs, ponding and evaporation. These soils have a higher moisture content and support some facultative plant species as a result. This area may also contain state jurisdictional drainages. No wetlands are located on the project site.

#### ***Special-Status Species***

Of the species identified during the database search, species were determined to have potential to occur within the project site if the species is known or expected to occur in the vicinity of the project site and if the project site or immediate vicinity contains suitable habitat. Species whose known distribution, habitat, or elevation range precluded their possible occurrence in the project vicinity were generally not further considered. Some taxa with relatively low probability for occurrence were retained for further evaluation due to the incomplete state of knowledge of the range and/or habitat of certain species. Focused surveys were conducted for the 14 special-status plant species with potential to occur in the project site detailed in Table 3-1. No special-status plant species were observed during the focused botanical surveys (Panorama

### 3 ENVIRONMENTAL ANALYSIS

Environmental, Inc., 2020; Kokx, Biologist, 2021) and special-status plants are presumed absent. Seven special-status wildlife species have a potential to occur on the site.

**Table 3-1 Special-Status Species with Potential to Occur in the Project Vicinity**

| Species  | Rank/Status | Potential to Occur on the Project Site   |
|--|-------------|--|
| <b>Plants</b>  |             |  |
| <i>Ivesia kingii</i> var. <i>kingii</i> (alkali ivesia)                  | 2B.2        | <i>Absent.</i> Within Great Basin Scrub, meadows and seeps, playas/mesic, alkali. Observed at elevations from 1,200 - 2,130 meters.  |
| <i>Calochortus excavatus</i> (Inyo County star-tulip)                    | 1B.1        | <i>Absent.</i> Chenopod scrub, meadows and seeps/alkaline and mesic Observed at elevations from 1,150 -200 meters. Known from small remnants of former populations.                                    |
| <i>Crepis runcinata</i> (fiddleleaf hawksbeard)                          | 2B.2        | <i>Absent.</i> Mojave Desert scrub, pinyon and juniper woodland/mesic, alkaline. Observed at elevations from 1,250-1,450 meters.   |
| <i>Phacelia inyoensis</i> (Inyo phacelia)                                | 1B.2        | <i>Absent.</i> Meadows and seeps (alkaline). Observed at elevations from 915-3,200 meters.   |
| <i>Micromonolepis pusilla</i> (dwarf monolepis)                          | 2B.3        | <i>Absent.</i> Alkaline, openings in Great basin scrub. Observed at elevations from 1,500-2,400 meters.  |
| <i>Cryptantha fendleri</i> (sand dune cryptantha)                        | 2B.2        | <i>Absent.</i> Sand dunes, sandy soils, sagebrush scrub. Observed at elevations from 1,950-2,210 meters.   |
| <i>Plagiobothrys parishii</i> (Parish's popcornflower)                   | 1B.1        | <i>Absent.</i> Wet alkaline meadows around springs and emergent wetlands or lake beds Observed at elevations from 750-1,400 meters.  |
| <i>Viola purpurea</i> ssp. <i>aurea</i> (golden violet)                  | 2B.2        | <i>Absent.</i> Great basin scrub, pinyon and juniper woodland. Observed at elevations from 1,000-1,800 meters.   |
| <i>Boechera dispar</i> (Pinyon rockcross)                                | 2B.3        | <i>Absent.</i> Joshua tree woodland, pinyon and juniper woodland. Mojavean desert scrub; granitic, gravelly. Observed at elevations from 1,200-2,400 meters.   |
| <i>Cymopterus globosus</i> (globose cymopterus)                          | 2B.2        | <i>Absent.</i> Great Basin scrub. Sandy, open flats. Observed at elevations from 1,215-2,090 meters. Last seen April 26, 1897.   |
| <i>Phacelia gymnoclada</i> (Naked-stemmed phacelia)                      | 2B.3        | <i>Absent.</i> Chenopod scrub, Great Basin scrub, pinyon and juniper woodland. Gravelly or clay soils. Observed from 1,200-2,500 meters.   |
| <i>Chaetadelpa wheeleri</i> (Wheeler's dune broom)                       | 2B.2        | <i>Absent.</i> Desert dunes, Great Basin scrub Mojavean desert scrub; sandy. Observed from 795-1,900 meters.   |
| <i>Drobanche ludoviciana</i> var. <i>arenosa</i> (Suksdorf's broomerape) | 2B.3        | <i>Absent.</i> Parasitic on <i>Ericameria</i> and <i>Iva</i> spp. Similar to <i>O. parishii</i> ssp. <i>parishii</i> ; separation between them blurred in Great Basin. Observed from 795-1,900 meters. |

### 3 ENVIRONMENTAL ANALYSIS

| Species   | Rank/Status    | Potential to Occur on the Project Site  |
|---|----------------|---|
| <i>Sphaeromeria potentilliodes</i> (alkali tansy-sage)      | 2B.2           | <i>Absent.</i> Meadows and seeps. Playas, usually alkaline. Observed from 2,100-2,400 meters.   |
| <b>Wildlife</b>   |                |   |
| <i>Pyrgulopsis wongi</i> (Wong's springsnail)               | FSS            | <i>Low.</i> Great Basin flowing waters Meadow and seeps and small-moderate size spring-fed streams. Common in watercress and/or on small bits of travertine and stone.  |
| <i>Ovis Canadensis ssp nelsoni</i> (Desert bighorn sheep)   | BLMS, CFP, FSS | <i>Low.</i> Widely distributed from the White Mountains in Mono County. Open, rocky, steep areas with available water and herbaceous forage. Active year round.   |
| <i>Buteo swainsonii</i> (Swainson's Hawk)                   | BCC, BLMS      | <i>Low.</i> Great Basin grassland. Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Nests April through July. |
| <i>Corynorhinus townsendii</i> (Townsend's big-eared bat)   | SSC            | <i>Low.</i> Roosts in the open, hanging from walls and ceilings. Breeds in mines and caves. Roosting sites limiting. Extremely sensitive to human disturbance.  |
| <i>Microtus californicus vallicola</i> (Owen's Valley Vole) | SSC, BLMS, FSS | <i>Low.</i> Found in wetlands and lush grassy ground in the Owens Valley. Needs friable soil for burrowing. Eats grasses, sedges, and herbs.  |
| <i>Lanius ludovicianus</i> (Loggerhead Shrike)              | SSC            | <i>Medium-High.</i> Found in grasslands and desert with scattered shrubs nesting in large dense spiny shrubs and low trees.   |
| <i>Artemisiospiza belli</i> (Bell's Sparrow)                | SSC            | <i>Low.</i> Outside of known range.   |

**Listing:**

BCC = USFW Bird of Conservation Concern

BLMS = BLM Sensitive

CFP = California Department of Fish and Wildlife Fully Protected Species

FSS = USFS Sensitive

SSC = California Department of Fish and Wildlife Species of Special Concern

WL = California Department of Fish and Wildlife Watch List

**California Rare Plant Ranks:**

1B Plants Rare, Threatened, or Endangered in California and Elsewhere

2B Plants Rare, Threatened, or Endangered in California, but More Common Elsewhere

0.1 Seriously threatened in California

0.2 Moderately threatened in California

0.3 Not very threatened in California

### 3 ENVIRONMENTAL ANALYSIS

- 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?**

#### **General Plan Amendment**

##### **Special-Status Plant Species**

The results of the focused botanical surveys indicate that no special-status plants are present within the project site. Future development and uses on the project site could involve earth-disturbing activities and use of equipment that would result in a less than significant impacts on special-status plants due to minor reduction in suitable habitat.

##### **Special-Status Wildlife Species**

One special-status bird species was found to have a medium to high potential to occur on the project site, as detailed in Table 3-1. Nesting birds protected under state and federal law could use habitat on the project site. Agricultural activities on the project site could remove foraging and nesting habitat. Equipment use and earth-disturbing activities could result in nest destruction or mortality of young during the nesting season, which is typically February through September, and an active nest is present. Use of heavy equipment and the increase in human activity associated with the future development could also cause nest abandonment if construction were to occur near an active nest during the nesting season. Loss of an active nest, whether directly through tree removal or indirectly due to adjacent noise and activity, would result in a significant impact. The loggerhead shrike and other nesting bird species would be protected by the Migratory Bird Treaty Act (MBTA), which makes it illegal to harm nests without a valid Federal permit. Future developments would also be subject to the provisions of the California Fish and Game Code 3503 which protect against the destruction of nests. The impact on nesting birds and loggerhead shrike would be less than significant with adherence to the MBTA and California Fish and Game Code 3503.

#### **Cannabis Facility**

##### **Special-Status Plant Species**

No special-status plant species were identified during the reconnaissance survey and focused botanical surveys. The cannabis facility would result in a less than significant impact on special-status plant species.

##### **Special-Status Wildlife Species**

The project would involve heavy equipment use within habitat where there is a medium to high potential for encountering loggerhead shrike and other migratory bird species protected under state and federal law including California Fish and Game Code 3503 and the MBTA, which make it illegal to take or destroy a nest without a valid permit. The cannabis facility would comply with the 2015 General Plan policies and actions. Policy 2.A.1 and Action 2.A.1.a. require projects that could cause impacts on animal habitats to conduct an assessment and identify mitigation measures to be made a part of project approval. Action 2.A.1.b. requires projects with

### 3 ENVIRONMENTAL ANALYSIS

potential impacts on nesting birds to consult with state and federal agencies and prepare a nesting bird plan, as necessary, as a condition of approval. If loggerhead shrike or other birds were nesting in the project area during construction, noise and disturbance associated with use of heavy equipment and human traffic could result in nest mortality or abandonment if the activity occurs during the nesting season. As discussed above, the loggerhead shrike and other nesting bird species would be protected by the MBTA. Activities related to the cannabis facility would be subject to the provisions of the California Fish and Game Code 3503 which protect against the destruction of nests. The impact on nesting birds and loggerhead shrike would be less than significant with adherence to the MBTA and California Fish and Game Code 3503.

**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 US Fish and Wildlife Service?**

#### **General Plan Amendment**

A small population of Greasewood Scrub in alliance with *Suaeda nigra* was observed on the project site during focused botanical surveys. The population of Greasewood Scrub in alliance with *Suaeda nigra* observed on-site is located in area with high saline content, which is not suitable for agricultural use (Kokx, 2021). Future agricultural development would likely avoid this sensitive natural community habitat. However, if this community were graded or impacted as part of future permitted activities, the population is too small to have a detrimental effect to the community throughout California (Kokx, 2021). The project site does not contain riparian habitat that could be disturbed by development. Future development and uses would comply with the 2015 General Plan policies and actions. Action 2.A.1.d. and Action 2.A.1.e. require planting with native vegetation and procedures to avoid introducing invasive weeds to the area. The impact would be less than significant.

#### **Cannabis Facility**

No sensitive natural communities occur within the area for the cannabis facility development. The cannabis facility development would not affect sensitive natural communities. No impact would occur.

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

#### **General Plan Amendment and Cannabis Facility**

No wetlands occur in any portion of the project site. No impact would occur.

**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?**

#### **General Plan Amendment and Cannabis Facility**

The project site is in a valley with low density development surrounded by more natural, less developed hills. The project site does not serve as an important migratory corridor for wildlife

### 3 ENVIRONMENTAL ANALYSIS

and plants. The existing perimeter fencing around the property currently precludes some wildlife from traveling through the site. The proposed fencing around the cultivation area would not appreciably affect movement of wildlife through the project site. Future uses under the General Plan Amendment, such as livestock grazing, would not substantially alter any existing movement through the project site, due to the existing fence posing a boundary. Movement of small wildlife, such as lizards and rodents, through the site would be generally unaffected by development or agricultural use. Wildlife would still be able to travel through the broader region. The impact on wildlife movement would be less than significant. Refer to Impact a) for a discussion of impacts on nesting birds.

- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

#### General Plan Amendment and Cannabis Facility

No local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, apply to the project (Mono County, 2015). No impact would occur.

- 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?**

#### General Plan Amendment and Cannabis Facility

The project site is not located within an area covered by an adopted habitat conservation plan or natural community conservation plan (Mono County, 2015). No impact would occur.

### 3.5 Cultural Resources

| Environmental Impacts  | Potentially Significant Impact      | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|-------------------------------------|---|-------------------------------------|--------------------------|
| <b>5. CULTURAL RESOURCES. Would the project:</b>   |                                     |   |                                     |                          |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?      | <input checked="" type="checkbox"/> | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of formal cemeteries?                           | <input type="checkbox"/>            | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### Records Search and Cultural Resource Assessment

A Cultural Resources Records Search was conducted for the proposed site at the Eastern Information Center, University of California, Riverside (EIC). The search involved a 1-mile

### 3 ENVIRONMENTAL ANALYSIS

radius around the boundaries of project site and collected all available information about previous cultural resources studies and known archaeological sites/isolated finds within the subject area.

The EIC search identified six previous cultural resources studies and 13 known cultural resources within the 1-mile radius, while additional research identified four other cultural resources studies. Eleven of the cultural resources are archaeological sites, nine of which lie in proximity to the current project site. The other two resources are isolated artifacts (Great Basin Consulting Group, 2020).

A pedestrian survey was conducted between July 31 and August 2020 for the proposed project by Great Basin Consulting Group personnel. The results of the pedestrian survey confirmed that the nine archaeological sites identified during records search are located within the project site. Four of the nine archaeological sites are eligible for listing in the California Register of Historical Resources. The results of the pedestrian survey and associated archaeological resources documentation are summarized in the Cultural Resource Assessment (Great Basin Consulting Group, 2020).

#### **Project Site**

None of the previously recorded cultural resources are located within the project site; however, previous cultural resource studies were not focused on the project site. The project vicinity contains a high volume of sensitive prehistoric and historic resources. The former alignment of the Southern Pacific (SP) Railroad and Carson & Colorado (C&C) Railroad once ran north-south through the project site. Although there was never a siding or station in the vicinity of the project area, it is possible that the remains of temporary railroad worker's camps occur within the project site.

The records search identified that the original road through Hammil and Chalfant valleys ran through the eastern edge of the project site. There are also many unimproved dirt roads within the project site, some of which are depicted on the 1962 Benton, California 15-Minute quadrangle and therefore would appear to be of historic age, likely dating prior to 1960. These roads could have been created and used for many different purposes during historic times, perhaps residential, recreational, or industrial. The roads are associated with the operation of the historic Comanche Mine and Mill, the remains of which are located immediately south/southwest of the project site within the records search radius. The Comanche Mine was located in 1862, becoming a major part of the Blind Springs Hill mining district upon its organization in 1864 (Great Basin Consulting Group, 2020).

- a) **Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**  
and
- b) **Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**

### 3 ENVIRONMENTAL ANALYSIS

#### General Plan Amendment and Cannabis Facility

Future development and uses could damage or destroy known historical and archaeological resources resulting in a significant impact. According to General Plan Policy 15.C.1 if the impact on cultural resources cannot be reduced to less than significant, then a statement of overriding considerations is required through an EIR process. Thus, the project may result in a potentially significant impact that is not discussed in the 2015 General Plan EIR and this topic area will be evaluated in the Focused EIR.

**c) Would the project disturb any human remains, including those interred outside of formal cemeteries?**

#### General Plan Amendment and Cannabis Facility

No known cemeteries or human remains are located on the project site. If any human remains are uncovered, all project site activities would be required to comply with state policies. All site disturbance would halt until the County Coroner has made a determination as to the status of the human remains (Health and Safety Code 7050.5-7055). If the human remains may be those of a Native American, the Native American Heritage Commission shall be contacted, and the appropriate treatment identified for the remains (Health and Safety Code 7050.5.(b); Public Resources Code Section 5097.98). Compliance with appropriate regulations would ensure that human remains are not damaged by project activities. The impact would be less than significant.

### 3.6 Energy

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| <b>6. ENERGY. Would the project:</b>  |                                |   |                                     |                          |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

#### General Plan Amendment and Cannabis Facility

Construction of the cannabis facility and future structures on the project site would require energy to produce the raw building materials, in addition to powering construction equipment and vehicles. Fuel and energy use during construction would be consistent with typical



### 3 ENVIRONMENTAL ANALYSIS

construction and manufacturing practices, and would not be an excessive or wasteful use of energy.

Future development and uses could include the cultivation and harvesting of crops, and rearing and management of livestock. Agricultural uses may require energy use to power equipment, lighting, operation of facilities, and trucks traveling to and from the site. Future activities could produce agricultural products and goods that would be sold and used. During operation of the cannabis facility, the indoor cultivation facility would require the use of special lighting, ventilation, and air conditioning systems. Although the cannabis facility and some allowable uses may involve substantial energy use, production of commodities would be beneficial to the California economy and outweigh the quantity of energy consumed. Fuel use during operation of the cannabis facility or future uses would be consistent with typical agricultural and manufacturing practices. All development in Mono County would be required to comply with current California Green Building Standards Code Title 24, Part 11 (Cal Green) energy performance standards as well as policies and actions contained in the 2015 General Plan and the Resources Efficiency Plan to address energy conservation (Mono County, 2014). The project applicant and future operators on the project site would also have financial incentive to avoid wasteful, inefficient, and unnecessary consumption of the energy during operation. The impact would be less than significant.

**b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**General Plan Amendment and Cannabis Facility**

Future development and the proposed cannabis facility would obtain power from SCE, which is required to meet California’s renewable energy goals and polices. The project is also required to comply with California Green Building Standards Code, policies and actions set forth in the 2015 General Plan and the Resources Efficiency Plan. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact would be less than significant.

### 3.7 Geology and Soils

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact |
|--|--------------------------------|---|------------------------------|-----------|
| <b>7. GEOLOGY AND SOILS. Would the project:</b>  |                                |   |                              |           |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: |                                |   |                              |           |

### 3 ENVIRONMENTAL ANALYSIS

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| 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.        | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii) Seismic-related ground failure, including liquefaction?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iv) Landslides?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <b>a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</b>   |                                |   |                                     |                                     |
| <b>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.</b> |                                |   |                                     |                                     |

#### General Plan Amendment and Cannabis Facility

The project site is not located within an earthquake fault zone as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map (CDC, 2019). The nearest earthquake fault zone is

### 3 ENVIRONMENTAL ANALYSIS

located approximately 2.5 miles east of the project site. No known faults intersect the project site. Fault rupture would not occur on the project site. No impact would occur.

#### ii. Strong seismic ground shaking?

##### **General Plan Amendment and Cannabis Facility**

As discussed above, the project site is located in proximity to an earthquake fault zone. Future occupants of the project site, including employees and residents, could be subject to strong seismic shaking due to proximity to faults. Future development and the proposed cannabis facility would be designed to meet current California seismic structure codes. These structures, and all future development, would be constructed in compliance with the Seismic Requirements as outlined within the California Building Code (County of Mono, 2015). Compliance with the California Building Code and the County Building Code could prevent major damage to structures. The project would comply with the California Building Code and implementation of standard engineering techniques that would ensure structural safety. These standards reduce seismic hazards to a level of 'acceptable risk,' wherein the potential for significant human and property losses is outweighed by the benefits, given the probability of occurrence. Policies and actions in the 2015 General Plan, such as Action 1.A.2.C., which requires new construction to comply with Seismic Design Category D, support and strengthen these seismic safety programs, laws, and regulations. The impact from ground shaking would be less than significant.

#### iii. Seismic-related ground failure, including liquefaction?

##### **General Plan Amendment and Cannabis Facility**

The susceptibility of a soil to liquefaction is a function of the type of soil, depth, density, and water content of the granular sediments, and the magnitude of earthquakes likely to affect the area. Saturated, loose, granular sediment within the upper 50 feet are most susceptible to liquefaction. The potential for liquefaction increases with shallower groundwater (Caltrans, 2014). The project site is located on the eastern edge of the Owens Valley groundwater basin. Little data is available on groundwater elevations within the project vicinity. The TriValley Groundwater Management District conducts monitoring of groundwater elevations in the Owens Valley Groundwater Basin in Mono County. Groundwater elevations within the basin range from approximately 78 feet below ground surface to 128 feet below ground surface (DWR, 2020), which would be below a range that is at high risk for liquefaction. In addition, the project structures and future development would be designed to comply with engineering and construction requirements in accordance with the California Building Code and Mono County Building Code. The impact would be less than significant.

#### iv. Landslides?

##### **General Plan Amendment and Cannabis Facility**

The project site and adjacent surrounding area are relatively flat. The project site would not be subject to hazards from landslides. No impact would occur.

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#### b) Would the project result in substantial soil erosion or the loss of topsoil?

##### **Overview**

Soils underlying the project site are primarily Hessica fine sandy loam, Rovana gravelly loamy coarse sand, and Ulymeyer-Rovana complex. The runoff hazard is very low for both soil units. The soils on the project site have a moderate wind erosion hazard, but slight water erosion hazard (USDA, 2019).

##### **General Plan Amendment**

Future development and uses could involve construction of structures and various agricultural activities. Construction would involve grading and earthmoving, resulting in areas of bare soil that could be subject to erosion. A National Pollutant Discharge Elimination Service (NPDES) General Permit for construction activities would be required for construction activities that disturb over 1 acre. The NPDES Construction General Permit (NPDES No. CAS000002) requires that a Storm Water Pollution Prevention Program (SWPPP) be prepared by a Qualified SWPPP Developer that would include Best Management Practices (BMPs) to reduce erosion of disturbed soils. Grading over 10,000 square feet requires a grading permit from Mono County, which includes several general construction specifications that would minimize soil erosion. Construction disturbances on smaller areas would result in minimal erosion hazard. With proper implementation of BMPs, short-term construction-related erosion impacts would be minimized.

Agricultural activities, such as tilling and livestock grazing, could result in reduction of vegetative cover, exposure of soils, and loss of topsoil from wind erosion. The existing vegetation on the project site is moderately sparse and wind erosion is assumed to occur to some degree under existing conditions. Some agricultural activities occur in the project area, but overall the area is generally undeveloped and native vegetation is present. Transitioning the project site to agricultural activities, such as tilling or livestock grazing, would not substantially increase erosion in the region, compared to existing conditions. The future operators on the project site would also have an incentive to minimize erosion and loss of topsoil during operation, as this would degrade the ability of the land to be used for agricultural purposes. The impact from project-related erosion and loss of topsoil would be less than significant.

##### **Cannabis Facility**

Construction of the proposed cannabis facility would involve grading and earthmoving activities, which would expose bare soil resulting in soil. The project would involve up to 1.33 acres of surface disturbance over the entire construction period, which exceeds 1 acre and would necessitate compliance with the NPDES Construction General Permit. Soil erosion and topsoil loss would be minimized through implementation of the SWPPP and required BMPs, such as installation of straw wattles, silt fence, watering for dust control, and covering exposed surfaces. Operational activities would not involve earth disturbing activities that could result in erosion. With implementation of erosion control measures, the impact from erosion during construction would be less than significant.

### 3 ENVIRONMENTAL ANALYSIS

- c) **Would the project 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?**

#### **General Plan Amendment and Cannabis Facility**

The project site is flat and not susceptible to landslide hazards. As described above, liquefaction is not expected to be a risk on the project site due to the depth to groundwater in the basin. Construction vehicles and equipment used to construct the proposed project would not result in instability of the soils in the area. The proposed structures and any future development would be designed in accordance with current California seismic structure codes. Construction of the new structures would not result in increased instability. The project would not affect the stability of the soils in the area. The impact would be less than significant.

- d) **Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

#### **General Plan Amendment and Cannabis Facility**

Expansive soils are generally soils with a high percentage of clay. Soils on the project site are primarily loamy sand and do not exhibit highly expansive behavior. The proposed cannabis facility and future developments would be developed in accordance with the California Building Code and Mono County Building Code. The impact would be less than significant.

- e) **Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

#### **General Plan Amendment and Cannabis Facility**

The proposed cannabis facility would install a septic system. Future developments may involve installation of new or larger septic systems. All septic system installations are required to adhere to the stringent prohibitions established in the Water Quality Control Plan for the Lahontan Region and the goals and policies contained in the 2015 General Plan and the design would be subject to County review. The impact would be less than significant.

- f) **Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

#### **General Plan Amendment and Cannabis Facility**

No paleontological resources or unique geologic features have been identified or reported on the project site. The proposed project is underlain by valley fill and has a low potential to contain paleontological resources (Inyo County Water Department, 2016). The proposed cannabis facility and future developments would involve earth-disturbing and excavation activities. Construction activities for the cannabis facility would not extend beyond a few feet below ground surface and therefore would not reach bedrock, where paleontological resources are most likely to be uncovered. Construction and operation of the proposed cannabis facility and future developments would be unlikely to uncover and damage any unique paleontological resources. The impact would be less than significant.

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## 3.8 Greenhouse Gas Emissions

| Environmental Impacts  | Potentially Significant Impact      | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|--|-------------------------------------|---|------------------------------|-------------------------------------|
| <b>8. GREENHOUSE GAS EMISSIONS. Would the project:</b>   |                                     |   |                              |                                     |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input checked="" type="checkbox"/> | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input type="checkbox"/>            |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>            | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

**a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Future agricultural operations under the General Plan Amendment could generate greenhouse gas emissions that could have a significant impact on the environment. The project's impact on greenhouse gas emissions is evaluated in the Focused EIR.

**b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Future agricultural operations under the General Plan Amendment could generate greenhouse gas emission that have a significant impact on the environment, which could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The impact associated with this topic is evaluated in the Focused EIR.

## 3.9 Hazards and Hazardous Materials

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| <b>9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>   |                                |   |                                     |                          |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### 3 ENVIRONMENTAL ANALYSIS

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

#### General Plan Amendment

Future uses could involve the routine transport of standard chemicals such as pesticides, fertilizer, fuels, and lubricants used for agricultural activities. California Department of Food and Agriculture (CDFA) oversees licensee compliance of pesticides and fertilizers through the inspection and enforcement methods of the County Agricultural Commissioner and other agencies. The Inyo and Mono Counties Agricultural Commissioner’s Office conducts inspections roughly every year depending on the products being used.

Future developments that would transport, use, or store hazardous materials would be required to do so in compliance with applicable local, state, and federal hazardous material regulations, along with the requirements of CDFA. The potential impacts regarding the transport, use, and storage of hazards materials would be less than significant due to compliance with federal, state, and CDFA regulations.

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#### **Cannabis Facility**

Cannabis cultivation operations would involve the use of pesticides, fertilizers, and other agricultural chemicals, along with propane tanks for backup generator. Pesticides that would be used in the cultivation operations would be approved for use on cannabis by the State. The proposed cultivation activities would generate waste, including potentially hazardous waste such as cleaners or pesticides. Routine transport, handling, and disposal of these types of waste could expose people to hazards if adequate precautions are not taken. Under the CalCannabis Licensing Program by CDFA, cultivators would be required to store, use, and dispose of hazardous materials in accordance with a broad range of applicable laws and regulation. The project applicant would compliance with all CDFA rules and regulations.

Project activities that would transport, use, or store hazardous materials would be required to do so in compliance with applicable local, state, and federal hazardous material regulations, along with the requirements of CDFA. The potential impact regarding the transport, use, and storage of hazards materials would be less than significant due to compliance with federal and state regulations.

- b) Would the project 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?**

#### **General Plan Amendment and Cannabis Facility**

Future agricultural activities and the proposed cannabis facility would involve use of hazardous materials that would create a potential for on-site releases of these materials. Employees and other persons could be exposed to hazardous material release through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. It is unlikely that any releases of hazardous material would extend beyond the project site boundary considering the size of the project due to the small volume of hazardous materials that would be used in agricultural or cannabis operations. Employees would be required to abide by the Occasional Health and Safety Administration (OSHA) safety and health standards including requiring use of safety equipment to ensure impacts to workers from accidental hazardous materials releases would be less than significant.



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- c) **Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

#### **General Plan Amendment and Cannabis Facility**

No schools are located within one-quarter mile of the project site. The nearest school is located approximately 2.3 miles from the project site. No impact would occur associated with either the proposed cannabis facility or future developments.

- d) **Would the project 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?**

#### **General Plan Amendment and Cannabis Facility**

No known contaminated sites are located within 1 mile of the project site (SWRCB, 2021; DTSC, 2021). The nearest known contaminated site is Comanche Mine and Mill Site located approximately 2.5 miles north of the project site. This site is under evaluation (DTSC, 2021). The project would not disturb a known hazardous site. No impact would occur.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

#### **General Plan Amendment and Cannabis Facility**

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. No impact would occur.

- f) **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

#### **General Plan Amendment**

The project area is not located within an adopted emergency response plan or emergency evacuation plan. The General Plan indicates that all major highways, as well as roads leading to highways, could be used as an evacuation route when necessary. Highway 6 and State Route 120 would qualify as evacuation routes. The proposed project would not affect operation of Highway 6, which would be the main access road for emergency response or evacuation. Agricultural use and development would comply with the Mono County Design Guidelines to ensure that the use would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur.

#### **Cannabis Facility**

The project proposes no changes to access roads or Highway 6, which would be the main road for emergency vehicle access and for evacuations. No obstructions or other alterations that could hinder access would be installed. The project would have no impact on emergency response and evacuations.

### 3 ENVIRONMENTAL ANALYSIS

- g) **Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

#### General Plan Amendment and Cannabis Facility

The project site is in an area designated as a State Responsibility Area with a California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Rating of Moderate (CAL FIRE, 2007).

The conversion of the property to agricultural use or a cannabis facility would allow for development of agricultural structures, crops, introduction farm animals, and operation of a cannabis facility. These uses are not known to create a significant wildland fire hazard. However, a small, temporary increase in on-site fire risk could occur during construction of the proposed cannabis facility and future developments due to the presence of construction workers and equipment. This temporary increase of wildfire risk could expose construction workers and residents to a significant risk of loss, injury, or death if a wildland fire were to occur. Agricultural operations may involve use of heavy equipment or combustible materials that could increase wildfire risk on the project site compared to existing conditions, however, this nominally higher level of risk is no greater than other agricultural operations in the vicinity of the project site. Employees would be required to abide by the OSHA health and safety standards for using protective equipment to ensure impacts to workers from potential wildfires. The impact from exposure of people or structures to significant loss from wildland fires would be less than significant.

### 3.10 Hydrology and Water Quality

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| <b>10. HYDROLOGY AND WATER QUALITY. Would the project:</b>   |                                |   |                                     |                          |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?                                  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: |                                |   |                                     |                          |
| i) result in substantial erosion or siltation on- or off-site;   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### 3 ENVIRONMENTAL ANALYSIS

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) impede or redirect flood flows?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

#### **General Plan Amendment**

Future development under the Agriculture land use designation could result in non-point source stormwater discharges associated with land disturbance. The State Water Resources Control Board NPDES Program was adopted to control and enforce storm water pollutant discharge reduction per the Clean Water Act. The Lahontan Regional Water Quality Control Board issues and enforces the NPDES permit for discharges to waterbodies in Mono County. Any future agricultural use would be required to comply with the requirements of the NPDES program and Clean Water Act. Impacts would be less than significant.

#### **Cannabis Facility**

The proposed cannabis facility would disturb more than 1 acre of soil and therefore would be required to develop and implement a SWPPP under the Construction General Permit. The SWPPP depicts construction site perimeters, drainage patterns, existing and proposed structures, lots, roadways, and storm water collection and discharge points, and must also list the BMPs that will be used to protect storm water runoff and the placement of those BMPs. The SWPPP must also set forth a visual monitoring program and a chemical monitoring if there is a failure of best management practices. The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality during construction or during project operations. Impacts would be less than significant.

### 3 ENVIRONMENTAL ANALYSIS

- b) **Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

#### **General Plan Amendment**

The project site is underlain by Owens Valley groundwater basin. The Owens Valley groundwater basin is designated as low priority under the Sustainable Groundwater Management Act (DWR, 2019), indicating that groundwater supplies are being managed sustainably and are not in a state of overdraft. Groundwater within the area is managed and monitored by the TriValley Groundwater Management District and the primary use of groundwater in the basin is by Los Angeles Department of Water and Power (LADWP), who extract thousands of acre feet of water annually. Future groundwater use within the project area would be limited to application of groundwater for agricultural production within the project parcels. Agricultural production of a high water demand crop in this region would be expected to use a maximum of 4 acre feet of water per acre or 320 acre feet of water over the entire approximately 80-acre project area (Johnson & Cody, 2015). This volume of water would not affect groundwater supplies in the basin. The Agricultural use designation allows for limited structures to be developed on the site that would not substantially interfere with groundwater recharge. The General Plan Amendment would not impede sustainable groundwater management of the basin.

#### **Cannabis Facility**

The project would require water use for cannabis cultivation. The water would be supplied from the developed on-site well that produces 2,000 gallons of water per minute. The daily water demand for this project would not exceed the production capacity of the on-site well. The use of groundwater would not be unsustainable. The project includes small areas of new impervious surfaces for the cannabis facilities. The less than 1 acre of new impervious surfaces would not appreciably affect groundwater recharge within the basin. The impact would be less than significant.

- c) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**
- i. **result in substantial erosion or siltation on- or off-site;**

#### **General Plan Amendment**

Future development and uses under the General Plan Amendment could involve construction of structures and various agricultural activities. Construction would involve grading and earthmoving, resulting in areas of bare soil that could be subject to erosion. A NPDES General Permit for construction activities would be required for construction activities that disturb over 1 acre. The NPDES Construction General Permit (NPDES No. CAS000002) requires that a Storm Water Pollution Prevention Program (SWPPP) be prepared by a Qualified SWPPP Developer that would include BMPs to reduce erosion of disturbed soils. Grading over 10,000 square feet requires a grading permit from Mono County, which includes several general construction

### 3 ENVIRONMENTAL ANALYSIS

specifications that would minimize soil erosion. Construction disturbances on smaller areas would result in minimal erosion hazard. With proper implementation of BMPs, short-term construction-related erosion impacts would be minimized.

Agricultural activities, such as tilling and livestock grazing, could result in reduction of vegetative cover, exposure of soils, and loss of topsoil from wind erosion. The existing vegetation on the project site is moderately sparse and wind erosion is assumed to occur to some degree under existing conditions. Some agricultural activities occur in the project area, but overall the area is generally undeveloped and native vegetation is present. Transitioning the project site to agricultural activities, such as tilling or livestock grazing, would not substantially increase erosion in the region, compared to existing conditions. The future operators on the project site would also have an incentive to minimize erosion during operation, as this would degrade the ability of the land to be used for agricultural purposes. The impact from project-related erosion and siltation would be less than significant due to compliance with existing State and federal water quality regulations.

#### **Cannabis Facility**

Construction of the proposed cannabis facility would involve grading and earthmoving activities, which would expose bare soil resulting in soil erosion. The project would involve up to 1.33 acres of surface disturbance over the entire construction period, which exceeds 1 acre and would necessitate compliance with the NPDES Construction General Permit. Soil erosion and topsoil loss would be minimized through implementation of the SWPPP and required BMPs, such as installation of straw wattles, silt fence, watering for dust control, and covering exposed surfaces. Operational activities would not involve earth disturbing activities that could result in erosion. With implementation of erosion control measures, the impact from erosion during construction would be less than significant.

- ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**

#### **General Plan Amendment**

The General Plan Amendment to change the land use designation from Rural Residential-40 to Agriculture-40 would maintain the allowed coverage of the site at 40 percent. Agricultural use could include activities that would remove the vegetation on the site and replace the vegetation with crops or animals. More intensive activity on the site could result in increased runoff due to soil compaction. The General Plan Amendment would not change the allowed coverage of the site. The General Plan Amendment would allow for increased impervious surfaces compared to baseline conditions but would not allow for additional impervious surfaces compared to the existing land use designation. Because the project parcels total 78.45 acres and only a portion of the parcels could become impervious in the future, the potential activity would not result in substantial increased flooding on or off site. The impact on flooding would be less than significant.

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#### **Cannabis Facility**

The cannabis facility includes a parking area, processing facility, and storage house would introduce approximately a quarter acre of impervious surface to the site. The cannabis facility has been located outside of the floodplain and the activities would not increase flooding on site. The limited area of new impervious surface would not change the rate or amount of surface runoff that would result in flood off-site. The impact would be less than significant.

- iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

#### **General Plan Amendment and Cannabis Facility**

There is no existing or planned public stormwater drainage system in the project area or vicinity. The General Plan Amendment and cannabis facility would not affect public stormwater drainage facilities. The General Plan Amendment would allow for agricultural uses including housing of animals and crop production that could contribute to polluted runoff. Any agricultural use would have to comply with the relevant requirements of the Clean Water Act including obtaining all necessary permits from the LRWQCB (e.g., Concentrated Animal Feeding Operation). The cannabis facility proposes capture and treatment of effluent to meet all water quality standards. Compliance with laws for protection of water quality would avoid significant impacts from polluted runoff.

- iv. impede or redirect flood flows?**

#### **General Plan Amendment**

The northern portion of the northern project parcel is within a floodplain. Development of structures on the parcel would still require compliance with County design guidelines and agricultural use would not introduce structures that would impede or redirect flood flows. Any future use of the site that could require large structures would require separate authorization and approval by the County. Agricultural use of the site would not introduce structures to the floodplain that would impede or redirect flood flows. The impact would be less than significant.

#### **Cannabis Facility**

The cannabis facility has been located outside of the floodplain. The cannabis facility would not impede or redirect flood flows. No impact would occur.

- d) Would the project result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

The northern portion of the northern project parcel is located within a flood plain. The project is not located within a tsunami or seiche zone.

#### **General Plan Amendment**

Agricultural activities on the project site could include application of pesticides or herbicides as well as use of petrochemicals to operate equipment and vehicles within portions of the project area that are located within the 100-year flood plain. The use of these materials would be

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conducted in compliance with applicable State and federal regulations and would be applied to the extent required. The agricultural use would also be similar to the surrounding agricultural parcels, which are also located within the floodplain. The impact from risk of pollution due to project inundation would be less than significant.

#### Cannabis Facility

The proposed cannabis facility is not located in flood hazard, tsunami, or seiche zones. The project would not risk release of pollutants due to project inundation. No impact would occur as a result of the proposed cannabis facility.

- e) **Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

#### General Plan Amendment and Cannabis Facility

The Owens Valley groundwater basin is designated as low priority under the Sustainable Groundwater Management Act (DWR, 2019), indicating that groundwater supplies are being managed sustainably and are not in a state of overdraft. No sustainable groundwater management plan has been prepared that applies to the groundwater basin underlying the project site. No conflict with a sustainable groundwater management plan would occur.

The Lahontan Basin Plan is the water quality control plan covering the project region (LRWQCB, 1995). The Lahontan Basin Plan defines water quality standards and objectives for water quality through the Lahontan region. The water bodies downstream of the project site are not impaired and a total maximum daily load has not been adopted. The agricultural use and future cannabis facility would need to comply with policies for water quality defined in the Lahontan Basin Plan. The project would not conflict with or obstruct implementation of a water quality control plan. No impact would occur.

### 3.11 Land Use and Planning

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>11. LAND USE AND PLANNING. Would the project:</b>   |                                |   |                                     |                                     |
| a) Physically divide an established community?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

### 3 ENVIRONMENTAL ANALYSIS

a) **Would the project physically divide an established community?**

**General Plan Amendment and Cannabis Facility**

The project site is mostly undeveloped and is adjacent to residential uses to the south. There is no established community within or adjacent to the project parcels. Future development under the Agriculture designation would not divide an established community because there are agricultural uses to the north and east, and industrial uses to the west of the project site. The project would not construct a new roadway, flood control channel, or other structure that would physically divide any community. No impact would occur.

b) **Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**General Plan Amendment and Cannabis Facility**

Future development under the Agriculture designation would not conflict with land use plans, policies, or regulations as it would be required to be consistent with the development footprints and uses permitted in the Agriculture designation. The proposed cannabis facility is subject to County approval of the Conditional Use Permit and will need to comply with all County requirements for cannabis operations contained in the General Plan and County Code Chapter 5.60. The General Plan Amendment to Agriculture-40 is proposed so that the cannabis operations comply with the General Plan requirements for cannabis use. The cannabis facility would not conflict with a land use plan, policy, or regulation with the proposed General Plan Amendment. The impact would be less than significant.

### 3.12 Mineral Resources

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|---|--------------------------------|---|------------------------------|-------------------------------------|
| <b>12. MINERAL RESOURCES. Would the project:</b>  |                                |   |                              |                                     |
| 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?                                | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |



### 3 ENVIRONMENTAL ANALYSIS

- a) **Would the project 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?**
- b) **Would the project 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?**

#### General Plan Amendment and Cannabis Facility

The California Legislature enacted the Surface Mining and Reclamation Act (SMARA) in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. SMARA requires the California Department of Conservation (CDC), California Geological Survey, to conduct Mineral Land Classification surveys. These surveys designated land areas, such as mineral resources zones or aggregate resource zones, depending on the type of resources identified in the area. The project area is designated as mineral resource area (MRA) 4: area where available information is inadequate for assignment to any other MRA and the project area is adjacent to areas designated as MRA 2 where adequate info indicate significant mineral deposits (CDC, 2015). The project area previously contained a mine; however, the mine has been abandoned. Agricultural and cannabis use of the site would not preclude any future access to or availability of any mineral deposits that could occur within the site. The project would not result in the loss of availability of a known mineral resource. No impact would occur.

### 3.13 Noise

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>13. NOISE. Would the project result in:</b>  |                                |   |                                     |                                     |
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Generation of excessive groundborne vibration or groundborne noise levels?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

### 3 ENVIRONMENTAL ANALYSIS

- a) **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

#### **General Plan Amendment**

Agricultural use, such as use of tractors or other heavy equipment that are used in agricultural operations, would generate noise that could affect adjacent lands. The project site is adjacent to land designated as rural residential to the south. The nearest residence is located approximately 230 feet south of the project site. Future agricultural use would be required to abide by Chapter 10.16 of the Mono County Code for noise regulations and the General Plan Noise Element policies during construction and use, which would ensure that noise impacts would be less than significant.

#### **Cannabis Facility**

The project would involve cultivation and distribution of cannabis. The cannabis facility is located over 1,000 feet from the nearest sensitive receptor. Cannabis activities would not produce significant temporary construction noise or continuous operational noise that would generate substantial temporary or permanent noise at any receptor location. The applicant shall also comply with the General Plan Noise Element policies and programs and with standards contained in Chapter 10.16 of the Mono County Code to ensure that on-site operations do not generate noise with an intensity that exceeds county standards at noise sensitive land uses. Construction and operational noise impacts would be less than significant.

- b) **Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**

#### **General Plan Amendment and Cannabis Facility**

Groundborne vibration dissipates rapidly over distance with most vibration-related damages occurring within 25 feet of the vibration source and the vibration produced from equipment used in agricultural operations or the proposed cannabis facility would likely be imperceptible at distances greater than 25 feet (Federal Transit Administration, 2018). There are no sensitive receptors within 25 feet of the project site; therefore, the agricultural use and the cannabis facility would not create an impact from groundborne vibration. The impact would be less than significant.

- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

#### **General Plan Amendment and Cannabis Facility**

The project site is not located within the vicinity of a private airstrip or an airport land use plan or, within two miles of a public airport or public use airport. The nearest airport, Eastern Sierra Regional Airport, is located approximately 30 miles south of the project site. The proposed

### 3 ENVIRONMENTAL ANALYSIS

cannabis facility or future developments would not expose people working in the project area to excessive noise levels. No impact would occur.

## 3.14 Population and Housing

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact                           |
|---|--------------------------------|---|------------------------------|-------------------------------------|
| <b>14. POPULATION AND HOUSING. Would the project:</b>   |                                |   |                              |                                     |
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

- a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

### General Plan Amendment

Future development could include a single-family residence, accessory dwelling units, and mobile homes on the property. Mono County has an average of 2.37 persons per household (Department of Finance, 2019). Therefore, future development under the Agriculture designation could result in an incremental population increase on the property as well as provide some employment opportunities, but would not result in an overall substantial growth in the County. The impact would be less than significant.

### Cannabis Facility

The proposed cannabis facility does not include the construction of housing units nor changes to public road or other infrastructure that would induce any population growth. No impact would occur.

- b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

### General Plan Amendment and Cannabis Facility

There is no housing, nor population inhabiting the project area. The project would not displace people or housing. No impact would occur.

### 3 ENVIRONMENTAL ANALYSIS

#### 3.15 Public Services

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| <b>15. PUBLIC SERVICES.</b>   |                                |   |                                     |                          |
| 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?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Police protection?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Schools?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Parks?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other public facilities?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

- 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?**

**General Plan Amendment and Cannabis Facility**

The project area is located in moderate fire hazard severity zone (CAL FIRE, 2007).. The proposed cannabis facility and future development under the General Plan Amendment would be similar to existing uses in the surrounding areas. Operation of a cannabis facility and future agricultural development are not known to create a significant risk for fire ignition, as analyzed under Section 3.9: Hazards and Hazardous Material Impact g). If a fire were to occur, fire service would be provided by White Mountain Fire Protect District (WMFPD). The WMFPD provides fire prevention/suppression and emergency medical response services to the communities of Benton and Hammil Valleys (Mono County Local Agency Formation Commission , 2009). The proposed cannabis facility and future developments would not affect response times or service ratios for the WMFPD’s fire station in Benton and there would be no need to create a new or altered fire station. The impact would be less than significant.

**Police protection?**

**General Plan Amendment and Cannabis Facility**

Police services for the project site would be provided by the Bishop Police Department (BPD) or California Highway Patrol. BPD is located approximately 29 miles south of the project site.

### 3 ENVIRONMENTAL ANALYSIS

Future development under the General Plan Amendment would include construction of structures and various agricultural activities and could result in an incremental population increase on the property and surrounding area to supply workers for the property. This could result in increase in the demand for police protection service. However, the amount of proposed development would not result in a need for expanded fire or police services. In addition, the future development would be required to comply with applicable County policies to promote public and property safety. Therefore, permitted agricultural uses of the project site would not create a new demand for police protection.

The proposed cannabis facility would install numerous security measures and systems, including lighting and perimeter fencing that would generate minimal additional need for police protection and would not require additional service beyond those currently available. The impact would be less than significant.

#### **Schools?**

##### **General Plan Amendment and Cannabis Facility**

The nearest school to the project site is Edna Beaman Elementary School, located approximately 2.4 miles north of the project site. The Agriculture designation of the site could allow for a small increase in population on the site and surrounding area compared to the existing designation and existing conditions. The potential for a small increase in population could increase demand for schools but would not result in the need for new school facilities. The proposed cannabis facility would create one to two seasonal employee positions and one permanent position on the site. Operation of the cannabis facility would not induce substantial population growth that would impact schools. The impact of the project on schools would be less than significant.

#### **Parks and Other Public Facilities?**

##### **General Plan Amendment and Cannabis Facility**

The General Plan Amendment from Rural Residential to Agriculture could allow for a small increase in population on-site due to higher density allowed. The General Plan Amendment and cannabis facility would not result in need for additional parks to be constructed or impact other governmental facilities as the increase would be negligible. The additional workforce associated with potential agricultural facilities and the proposed cannabis facility (one full-time and two part-time employees) would be served from the region. The impact would be less than significant.

### 3 ENVIRONMENTAL ANALYSIS

#### 3.16 Recreation

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>16. RECREATION.</b>   |                                |   |                                     |                                     |
| 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?               | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 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?                                      | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <p><b>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?</b></p> |                                |   |                                     |                                     |

#### General Plan Amendment and Cannabis Facility

No parks occur in the project area or vicinity. The General Plan Amendment from Rural Residential to Agriculture could allow for a small but increased population on-site but would not substantially increase use of parks. Future development under the General Plan Amendment could increase employment opportunities in the area; however, the employees are anticipated to come from the region and the project would not induce growth. The proposed cannabis facility would only create one permanent job. The project would not indirectly increase the use of existing neighborhood or regional parks or other recreation facilities. The impact on parks as a result of the project would be less than significant.

- 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?**

#### General Plan Amendment and Cannabis Facility

The General Plan Amendment from Rural Residential to Agriculture could allow for a small but increased population on-site but would not be substantial enough to require new or expanded recreational facilities. The proposed cannabis facility and future development under the General Plan Amendment would increase employment opportunities in the area; however, the employees are anticipated to come from the region and the project would not induce growth. The project would not indirectly create a need to require the construction or expansion of recreational facilities. The project would not include recreational facilities or require the construction or expansion of recreational facilities. No impact would occur.

### 3 ENVIRONMENTAL ANALYSIS

#### 3.17 Transportation

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| <b>17. TRANSPORTATION. Would the project:</b>  |                                |   |                                     |                          |
| a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?           | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in inadequate emergency access?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

#### General Plan Amendment and Cannabis Facility

Highway 6 would be the main roadway that provides access to the project site. No public transit, bicycle or pedestrian facilities currently serve the project area. General Plan Policy 30.A.2 would involve construction of a new bike route along U.S. Highway 6 from the Inyo and Mono county line to the intersection of Highway 6 and State Route 6 in Benton. Future development may result in temporary vehicle trips during construction of agricultural structures and permanent vehicle trips associated with operation of private or commercial agricultural facilities. Vehicles associated with any future development would use regional and local roadways, primary Highway 6 for accessing the project site. Operation of agricultural activities under the General Plan Amendment could increase vehicle traffic but not significantly. The amount of vehicle trips associated with construction or operation of future agricultural facilities would be minimal. The cannabis facility would result in 8 daily worker vehicle trips (from a maximum of 4 construction workers) on Highway 6 during construction. The cannabis facility would involve one permanent worker that would be living on-site; therefore, no daily worker vehicle trip is anticipated during operation. The cannabis facility would also include approximately one delivery truck trip per month during facility operation. The low level of worker and truck trips generated by the project would not conflict with existing or proposed (e.g., bicycle) uses of Highways 6. The increase in daily trips would not significantly impact the circulation system. Implementation of the project would not conflict with a program, ordinance or policy addressing the circulation system.

### 3 ENVIRONMENTAL ANALYSIS

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

**General Plan Amendment and Cannabis Facility**

Future development under the General Plan Amendment and the proposed cannabis facility could provide employment opportunities in the area and an incremental population increase on the property. However, the employees are anticipated to come from the region and the project would not induce population growth. Providing jobs to local residents would result in similar vehicle miles traveled as compared to the existing conditions because workers may be located in proximity to the project site. The impact would be less than significant.

**c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**General Plan Amendment and Cannabis Facility**

Future development under the General Plan Amendment would be required to comply with applicable County policies to ensure public and property safety. The Mono County Planning Department would review the consistency of the cannabis operations and future developments under the General Plan Amendment to ensure compatibility and geometric design does not result in dangerous traffic operations. The impact would be less than significant.

**d) Would the project result in inadequate emergency access?**

**General Plan Amendment and Cannabis Facility**

Future development under the General Plan Amendment and the proposed cannabis facility would be required to abide by the Mono County Emergency Operations Plan (EOP), which provides a framework for management and coordination in response to major emergencies within the county. The plan links detailed standard operating procedures (SOPs) at the local level to broader state and federal disaster planning. The EOP also addresses potential transportation-related hazards in Mono County (including earthquakes, volcanic eruptions, floods, and hazardous materials transport), as well as emergency preparedness and emergency response for the regional transportation system, including the identification of emergency routes. The County would also consult with CAL FIRE for emergency access requirements for new development in the State Responsibility Areas that cover most of the private property in Mono County. The impact would be less than significant.



### 3 ENVIRONMENTAL ANALYSIS

#### 3.18 Tribal Cultural Resources

| Environmental Impacts | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact | No Impact |
|-----------------------|--------------------------------|---|------------------------------|-----------|
|-----------------------|--------------------------------|---|------------------------------|-----------|

#### 18. TRIBAL CULTURAL RESOURCES.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

|  |                                     |                          |                          |                          |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**
- ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

#### General Plan Amendment and Cannabis Facility

The project would require consultation with Native American tribes pursuant to Assembly Bill 52 and Senate Bill 18. The project's impacts on tribal cultural resources are evaluated in detail in the Focused EIR.

### 3 ENVIRONMENTAL ANALYSIS

#### 3.19 Utilities and Service Systems

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>19. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>   |                                |   |                                     |                                     |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?  | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

- a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

#### General Plan Amendment

Future development under the Agriculture land use designation would allow for potential small-scale livestock farming operations and/or crop farming. The water source serving the project site is the existing well on-site. There is no water purveyor that provides treated water to the area. Agricultural use would not create new demand for treated water. The project area is not served by wastewater facilities and there is no stormwater drainage facilities in the area. The potential agricultural use may require development of an on-site stormwater drainage depending on the size of the operation. Development of an on-site stormwater drainage would be confined to the property and would not result in environmental effects beyond those already analyzed. Permitted agricultural uses could require extension of power, and potentially

### 3 ENVIRONMENTAL ANALYSIS

communication lines to the site; however, the demand for these resources would not be greater than the surrounding agricultural and rural residential uses. There is an existing SCE power line located 1,400 feet to the east of the project site. New or improved utilities on the project site could be needed for future agricultural uses and would have the potential to individually cause a significant environmental effect on known cultural resources. The impacts from potential utility improvements on the project site in relation to cultural resources are evaluated in the Focused EIR. All other effects are adequately addressed in this IS Checklist.

#### **Cannabis Facility**

Water for the construction and operation of the cannabis facility would be provided by an on-site well located in the northeastern corner of the parcel. The project would not require construction of new water supply facilities. The energy source for the project would be SCE. The project would require an extension of power distribution lines underground running parallel to the parcel's southern property line to the processing facility. The proposed power line extension could have a significant impact on the environment (Drews, 2021). No other utility extension would be required. The impacts from the power line extension in relation to cultural resources are evaluated in the Focused EIR. All other effects are adequately addressed in this IS Checklist.

- b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

#### **General Plan Amendment and Cannabis Facility**

The groundwater basin underlying the project site is not within overdraft (California Department of Water Resources, 2019). The maximum agricultural water demand that could be expected on the approximately 80-acre project site is approximately 320-acre feet of water (Johnson & Cody, 2015). Operation of the Cannabis Facility would source water from the developed on-site well that produces 2,000 gallons of water per minute. The daily water demand for cannabis operation would not exceed the production capacity of the on-site well. The use of groundwater for future agricultural development and the proposed Cannabis Facility would not exceed water supplies in the basin during normal, dry, or multiple dry years. The impact would be less than significant.

- c) Would the project 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?**

#### **General Plan Amendment and Cannabis Facility**

A 1,000-gallon septic tank and 120-foot leach field would be constructed as part of the proposed cannabis facility. Future agricultural uses may need to expand these facilities. The proposed cannabis facility and any allowed agricultural uses would not connect to the County's Wastewater Treatment Plant. No impact would occur.

### 3 ENVIRONMENTAL ANALYSIS

d), e) **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

#### General Plan Amendment and Cannabis Facility

Benton Crossing Landfill currently serves as the regional landfill for Mono County, and it is the only site in Mono County that accepts municipal solid wastes. Capacity at this landfill is expected to be adequate through 2023, after which the site will be closed (CalRecycle, 2021a). The agricultural use and proposed cannabis facility would not generate a substantial volume of solid waste that could not be accommodated at Benton Crossing Landfill given the small volume of waste that would be generated from the approximately 80 acres of agricultural operations and proposed cannabis facility. Pumice Valley Landfill would be available for solid waste disposal after the Benton Crossing Landfill ceases operation in 2023. Pumice Valley Landfill has remaining capacity of 358,790 cubic yards and is expected to be operational until 2048 (CalRecycle, 2021b). Agricultural and cannabis cultivation activities would generate several distinct types of waste, including green waste, solid waste, liquid waste, and potentially hazardous waste such as heavy metal, cleaners, or pesticides. All waste would be disposed of at permitted solid waste facilities and in accordance with local and State regulations. The impact would be less than significant.

### 3.20 Wildfire

| Environmental Impacts  | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>  |                                |   |                                     |                                     |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?   | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

### 3 ENVIRONMENTAL ANALYSIS

| Environmental Impacts   | Potentially Significant Impact | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/>       | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

#### Overview

The project site is located on State Responsibility Area lands identified by CAL FIRE as a Moderate Fire Hazard Severity Zone (CAL FIRE, 2007). The nearest Very High Fire Hazard Severity Zone is located approximately 18 miles west of the project site.

- a) **Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

#### General Plan Amendment and Cannabis Facility

The project parcels do not cross Highway 6 and neither the General Plan Amendment nor cannabis facility would involve any activities that would block Highway 6 or State Route 120 and affect evacuation in the event of an emergency. The allowed agricultural uses would not generate a substantial volume of traffic. The cannabis facility would add approximately one permanent job and the amount of additional traffic related to operation of the facility would not inhibit or slow down evacuation should a wildfire occur. The impact would be less than significant.

- b) **Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

#### General Plan Amendment and Cannabis Facility

The project site is relatively flat with minimal slope. The project site has no slope or prevailing winds that would exacerbate wildfire risk and expose future project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. The impact would be less than significant.

- c) **Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

#### General Plan Amendment and Cannabis Facility

Construction activities associated with future development and cannabis facility would have a less than significant impact related temporarily increase risk of wildfire ignition, as analyzed under Section 3.9: Hazards and Hazardous Material Impact g). A new powerline would be installed underground for the proposed cannabis facility. Since the powerline will be

### 3 ENVIRONMENTAL ANALYSIS

underground, there would be no potential risk to exacerbate wildfire hazards on the project site. The impact would be less than significant.

- d) **Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

#### General Plan Amendment and Cannabis Facility

The project site is located on flat land. Future agricultural structures under the General Plan Amendment and the cannabis facility would be constructed in accordance with applicable standards. No people or structures would be exposed to a significant risk due to runoff, post-fire slope instability or drainage changes. The impact would be less than significant.

### 3.21 Mandatory Findings of Significance

| Environmental Impacts  | Potentially Significant Impact      | Less than Significant with GP EIR Mitigation Incorporated | Less than Significant Impact        | No Impact                |
|--|-------------------------------------|---|-------------------------------------|--------------------------|
| <b>21. MANDATORY FINDINGS OF SIGNIFICANCE.</b>   |                                     |   |                                     |                          |
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/> | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input type="checkbox"/> |
| 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)?   | <input type="checkbox"/>            | <input type="checkbox"/>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                                  | <input type="checkbox"/>            | <input type="checkbox"/> |

### 3 ENVIRONMENTAL ANALYSIS

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

#### **General Plan Amendment and Cannabis Facility**

##### **Habitat of Fish and Wildlife Species and Populations**

The dominant habitat types on the project site (sagebrush scrub) are common throughout the great basin. The project would not substantially reduce the habitat of a fish or wildlife species because the approximately 80 acres of suitable habitat on the project site is common throughout the region. No fish or wildlife populations are known to occupy the project area. The project would not cause a fish or wildlife population to drop below self-sustaining levels. The impact on habitat for fish and wildlife species and populations would be less than significant.

##### **Plant or Animal Community**

The known and potential plant and animal communities discussed in Section 3.4: Biological Resources located within the project area are considered common throughout the region. The agricultural use and commercial cannabis activities would not threaten to eliminate any plant or animal community (Kokx, 2021). The impact would be less than significant.

##### **Rare or Threatened Plant or Animal**

The project area provides suitable habitat for several rare plants. No threatened plant or animal species were observed or have the potential to occur within the project site (Panorama Environmental, Inc., 2020; Kokx, 2019). No impact would occur.

##### **California History or Prehistory**

Implementation of the project would result in a potentially significant impact to cultural resources. The project's impacts on the known cultural resources are evaluated in detail in the Focused EIR.

- 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)?**

#### **General Plan Amendment and Cannabis Facility**

There are two transportation projects planned in the vicinity of the project site, including the Chicago Valley Thin Blanket Project located along Highway 6 from north of Benton to the intersection of California-Nevada state border and Benton Pavement Project also located along Highway 6 from North of Benton to the intersection of Highway 6 and Falls Creek Road (Caltrans, 2021). The Chicago Valley Thin Blanket Project is currently being constructed and the construction is anticipated to be complete in June 2021 (Caltrans, 2021). The Benton Pavement

### 3 ENVIRONMENTAL ANALYSIS

Project is currently undergoing project planning phase and tentative construction schedule is between October 2028 and December 2032 (Caltrans, 2021).

A Lot Merger application has been filed for the Dakota Ranch located approximately 6 miles north of the project site (Mono County, 2020). Four parcels would be merged under this application. All of the parcels have an existing land use designation of Agricultural. No development is proposed in conjunction with the lot merger.

The Mono County General Plan Amendment 21-01 would include land use designation changes for two properties (36 Christie Lane and 55030 Highway 120) located approximately 6.4 miles north of the project site (Mono County, 2021a). The 36 Christie Lane property currently contains residential development, and the land use designation would be changed from Public and Quasi-Public Facilities to Multi-Family Residential. The 55030 Highway 120 property's land use designation would be changed from Mixed Designation to Specific Plan. No new development is anticipated for both properties at the time of preparing this environmental document. The land use designation changes would be technical corrections and clarifications as part of the annual cleanup of the General Plan (Mono County, 2021b).

Implementation of the cumulative transportation projects would not generate significant environmental impacts as these projects involve refurbishment of existing roadways (Caltrans, 2019). No development is proposed in association with the cumulative projects that involve a lot merger and land use designation changes. While development would be allowed in accordance with the permitted uses of the new land use designation, the land use designation changes are technical corrections to conform with existing uses. The cumulative impacts on all resources would be less than significant.

**c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**General Plan Amendment and Cannabis Facility**

Environmental effects that may have an adverse effect on human beings, either directly or indirectly, are analyzed in each environmental resource section above. Implementation of the General Plan Amendment and Cannabis Facility would have the potential to result in a significant impact to air quality and greenhouse gas emissions. These project impacts on human beings are evaluated in the Focused EIR.

Future agricultural use would be required to abide by the Mono County Code for noise regulations and the General Plan Noise Element policies during construction and use. Construction of the proposed cannabis facility would occur for up to 8 months. The nearest residence is 230 feet south of the project site and could be exposed to air pollutant emissions or noise levels associated with construction activities. Construction workers could be exposed to air pollutants, including dust and diesel exhaust, and elevated noise levels. These impacts would be short-term and would cease upon completion of the construction process.



### 3 ENVIRONMENTAL ANALYSIS

Additionally, construction workers are subject to OSHA safety and health standards including requiring use of safety equipment during operation of loud equipment. The noise impact on human beings would be less than significant.

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### 4 References

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## 5 Report Preparers

This section lists those individuals who either prepared or participated in the preparation of this IS checklist.

Panorama Environmental, Inc. prepared this checklist for and under the direction of Mono County Community Development Department. The following staff listed in Table 5-1 contributed to this checklist.

**Table 5-1 Consultant Team**

| Contributor      | Title                     | Role   |
|------------------|---------------------------|--|
| Susanne Heim     | Principal/Senior Reviewer | Quality Control/Document Review and Revision for all Checklist Sections  |
| Caitlin Gilleran | Project Manager           | Project Management, Quality Control/Document Review and Revision for all Checklist Sections, Project Description |
| Yingying Cai     | Environmental Planner     | Preparation for all Checklist Sections, Project Description  |
| Corey Fong       | GIS Specialist            | GIS/Graphics   |

## 5 REPORT PREPARERS

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# Mono County Community Development Department

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May 15, 2021

Chairperson Charlotte Lange  
PO Box 237  
Lee Vining, CA 93541  
[char54lange@gmail.com](mailto:char54lange@gmail.com)

**RE: AB 52 NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN  
AMENDMENT AND CONDITIONAL USE PERMIT, APOGEE FAMRS**

Dear Chairperson Charlotte Lange,

As lead agency, the Mono County Community Development Department (the County) is preparing a Focused EIR to analyze potential impacts associated with approval of a proposed General Plan Amendment and Condition Use Permit. The Project is to change the land use designation of two properties south of Benton, CA, from Rural Residential to Agriculture, and a Conditional Use Permit for a commercial cannabis cultivation and whole-sale distribution. Cannabis cultivation will occur within three mixed-light greenhouses (a combination of artificial and natural light) and not exceed 8,640 square feet. The properties are APN 025-020-013 and 025-040-002 and are owned by one party. Proposed development on APN 025-020-013 includes improving the dirt access road to current driveway standards, development of two standard and one handicap parking spaces, a 320 square-foot storage house for septic system and water tank, a 32-square-foot well pump house, construction of three 2,880-square-foot green-houses, and construction of an 1,800-square-foot processing facility building. No development is proposed on APN 025-040-002 at this time.

Tribal participation is very important in the local planning process, and we are sending this letter to the Mono Lake Kutzadika Tribe to comply with AB 52. Under AB 52, tribes have 30 days to request consultation. In keeping with this timeframe, please send us your request by June 14, 2021 for consultation as requested under AB 52.

The project proposal is described more fully in the attached Notice of Preparation, and within the Initial Study that has been posted online:

<https://www.monocounty.ca.gov/planning/page/apogee-farms-focused-eir>.

The Draft Subsequent EIR is currently in preparation and is expected to be ready for public review and comment late in the summer of 2021. No hearings have been scheduled, and no hearings or public meetings are expected until after the public review period ends later this year.



To respond, please contact Michael Draper, Planning Analyst, Mono County Community Development Department, at 760.924.1805 or [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov). We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Mono Lake Kutzadika Tribe. Thank you for taking the time to consider this invitation.

Sincerely,

Michael Draper  
Planning Analyst  
(760) 924-1805  
[mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

Attachments:

1. Notice of Preparation

# Mono County Community Development Department

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May 15, 2021

Chairperson Shane Saulque  
25669 Highway 6 PMBI  
Benton, CA 93512  
[shanesaulque@hotmail.com](mailto:shanesaulque@hotmail.com)

**RE: AB 52 NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN  
AMENDMENT AND CONDITIONAL USE PERMIT, APOGEE FAMRS**

Dear Chairperson Shane Saulque,

As lead agency, the Mono County Community Development Department (the County) is preparing a Focused EIR to analyze potential impacts associated with approval of a proposed General Plan Amendment and Condition Use Permit. The Project is to change the land use designation of two properties south of Benton, CA, from Rural Residential to Agriculture, and a Conditional Use Permit for a commercial cannabis cultivation and whole-sale distribution. Cannabis cultivation will occur within three mixed-light greenhouses (a combination of artificial and natural light) and not exceed 8,640 square feet. The properties are APN 025-020-013 and 025-040-002 and are owned by one party. Proposed development on APN 025-020-013 includes improving the dirt access road to current driveway standards, development of two standard and one handicap parking spaces, a 320 square-foot storage house for septic system and water tank, a 32-square-foot well pump house, construction of three 2,880-square-foot green-houses, and construction of an 1,800-square-foot processing facility building. No development is proposed on APN 025-040-002 at this time.

Tribal participation is very important in the local planning process, and we are sending this letter to the Utu Utu Gwaitu Paiute Tribe to comply with AB 52. Under AB 52, tribes have 30 days to request consultation. In keeping with this timeframe, please send us your request by June 14, 2021 for consultation as requested under AB 52.

The project proposal is described more fully in the attached Notice of Preparation, and within the Initial Study that has been posted online:

<https://www.monocounty.ca.gov/planning/page/apogee-farms-focused-eir>.

The Draft Focused EIR is currently in preparation and is expected to be ready for public review and comment late in the summer of 2021. No hearings have been scheduled, and no hearings or public meetings are expected until after the public review period ends later this year.

To respond, please contact Michael Draper, Planning Analyst, Mono County Community Development Department, at 760.924.1805 or [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov). We look forward to receiving your reply and any information you are able to share, and would welcome the opportunity to meet with you and other members of the Utu Utu Gwaitu Paiute Tribe. Thank you for taking the time to consider this invitation.

Sincerely,

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Attachments:

1. Notice of Preparation

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March 4, 2022

Tina Braitewaite, Chairperson  
25669 Hwy. 6, PMB 1  
Benton, CA 93512  
[t.braithwaite@bentonpaiutesreservation.org](mailto:t.braithwaite@bentonpaiutesreservation.org)

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

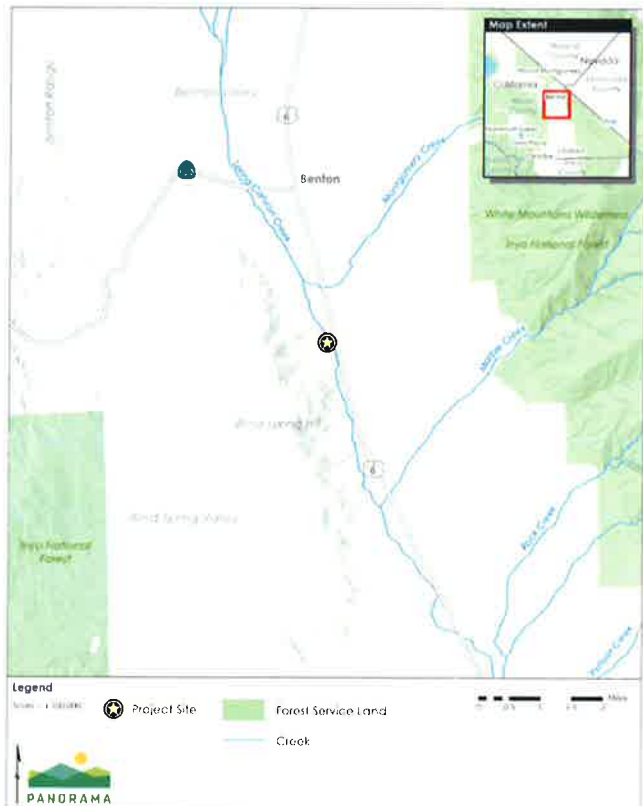
Dear Chairperson Braitewaite,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Specific Plan. The properties are APN 025-020-013 and 025-040-002, and are owned by one party.

The Project includes a land use designation change to Specific Plan for the purpose of constructing a cannabis cultivation and wholesale distribution operation. The Specific Plan will limit the type and location of development on the property. Cannabis cultivation will occur within three mixed-light greenhouses (a combination of artificial and natural light) and not exceed 8,640 square feet. The Project also includes a discretionary Conditional Use Permit and Cannabis Operation Permit.

State planning law and Senate Bill 18 (SB 18) requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan or designating land as open space.

Tribal participation is very important in the local planning process. Therefore, the purpose of this letter is to invite your participation and ensure the opportunity to conduct consultations in order to preserve, or mitigate impacts to, cultural places located on land within Mono County's jurisdiction that may be affected by these proposed General Plan amendments.



By law, **tribes have 90 days from the date of receipt of this letter to request consultation.** Recognizing that this letter is being sent on March 4, 2022, and allowing time for mailing, **your response must be received no later than June 6, 2022.** We also appreciate a response if you will not seek consultation.

### **Meeting Dates & CEQA**

A public hearing before the Planning Commission on this general plan amendment has not yet been scheduled. Following the Planning Commission meeting the project may then proceed to a public hearing by the Mono County Board of Supervisors in June 2022.

As authorized by Gov. Newsom's Executive Orders, N-25-20 and N-29-20, the meetings will be accessible remotely by livecast with Commissioners/Supervisors attending from separate remote locations. There is no physical meeting location. This altered format is in observance of recent recommendations by local officials that certain precautions be taken, including social distancing, to address the threat of COVID-19. Digital meeting information, including the telephone number and website where members of the public shall have the right to observe and offer comment, will be provided with the agendas of each meeting.

Planning Commission meetings are anticipated to begin at 10:00 am, and Board of Supervisors meetings are anticipated to begin at 9:00 am on the first three Tuesdays of each month. Meeting agendas are posted online on the Planning Commission and Board of Supervisors webpages and can be received via e-mail by subscribing to the Planning Commission and Board of Supervisors e-mail lists at the following links: <https://monocounty.ca.gov/planning-commission> and <https://monocounty.ca.gov/bos>.

We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Utu Utu Gwaitu Tribe of the Benton Paiute Reservation. Thank you for taking the time to consider this invitation.

Sincerely,



Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

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March 4, 2022

John Glazier, Chairperson  
P.O. Box 37  
Bridgeport, CA, 93517  
[chair@bridgeportindiancolony.com](mailto:chair@bridgeportindiancolony.com)

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Chairperson Glazier,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Specific Plan. The properties are APN 025-020-013 and 025-040-002, and are owned by one party.

The Project includes a land use designation change to Specific Plan for the purpose of constructing a cannabis cultivation and wholesale distribution operation. The Specific Plan will limit the type and location of development on the property. Cannabis cultivation will occur within three mixed-light greenhouses (a combination of artificial and natural light) and not exceed 8,640 square feet. The Project also includes a discretionary Conditional Use Permit and Cannabis Operation Permit.

State planning law and Senate Bill 18 (SB 18) requires cities and counties to contact and consult with California Native American tribes prior to amending or adopting any general plan or specific plan or designating land as open space.

Tribal participation is very important in the local planning process. Therefore, the purpose of this letter is to invite your participation and ensure the opportunity to conduct consultations in order to preserve, or mitigate impacts to, cultural places located on land within Mono County's jurisdiction that may be affected by these proposed General Plan amendments.



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We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Bridgeport Paiute Indian Colony. Thank you for taking the time to consider this invitation.

Sincerely,



Michael Draper  
Planning Analyst

760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

# Mono County Community Development Department

PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
[commdev@mono.ca.gov](mailto:commdev@mono.ca.gov)

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

March 4, 2022

Danelle Gutierrez, Tribal Historic Preservation Officer  
P.O. Box 700  
Big Pine, CA, 93513  
[d.gutierrez@bigpinepaiute.org](mailto:d.gutierrez@bigpinepaiute.org)

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Officer Gutierrez,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Specific Plan. The properties are APN 025-020-013 and 025-040-002, and are owned by one party.

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March 4, 2022

Charlotte Lange, Chairperson  
P.O. Box 237  
Lee Vining, CA, 93541  
[chair@monolaketribe.us](mailto:chair@monolaketribe.us)

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

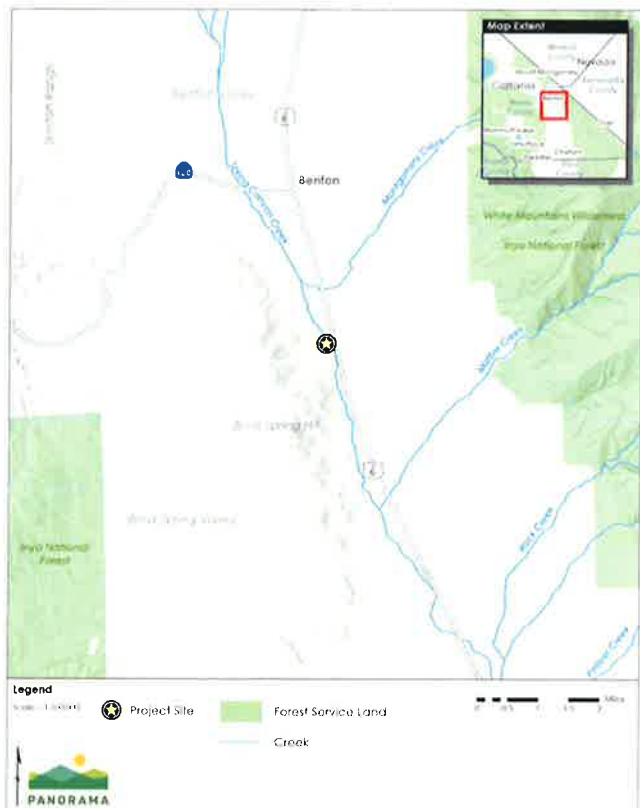
Dear Chairperson Lange,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Specific Plan. The properties are APN 025-020-013 and 025-040-002, and are owned by one party.

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We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Mono Lake Kutzadika Tribe. Thank you for taking the time to consider this invitation.

Sincerely,



Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

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March 4, 2022

Sally Manning, Environmental Director  
P. O. Box 700  
Big Pine, CA, 93513  
[s.manning@bigpinepaiute.org](mailto:s.manning@bigpinepaiute.org)

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Ms. Manning,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Specific Plan. The properties are APN 025-020-013 and 025-040-002, and are owned by one party.

The Project includes a land use designation change to Specific Plan for the purpose of constructing a cannabis cultivation and wholesale distribution operation. The Specific Plan will limit the type and location of development on the property. Cannabis cultivation will occur within three mixed-light greenhouses (a combination of artificial and natural light) and not exceed 8,640 square feet. The Project also includes a discretionary Conditional Use Permit and Cannabis Operation Permit.

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Sincerely,



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March 4, 2022

Melanie McFalls, Chairperson  
P.O. Box 220  
Schurz, NV, 89427

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

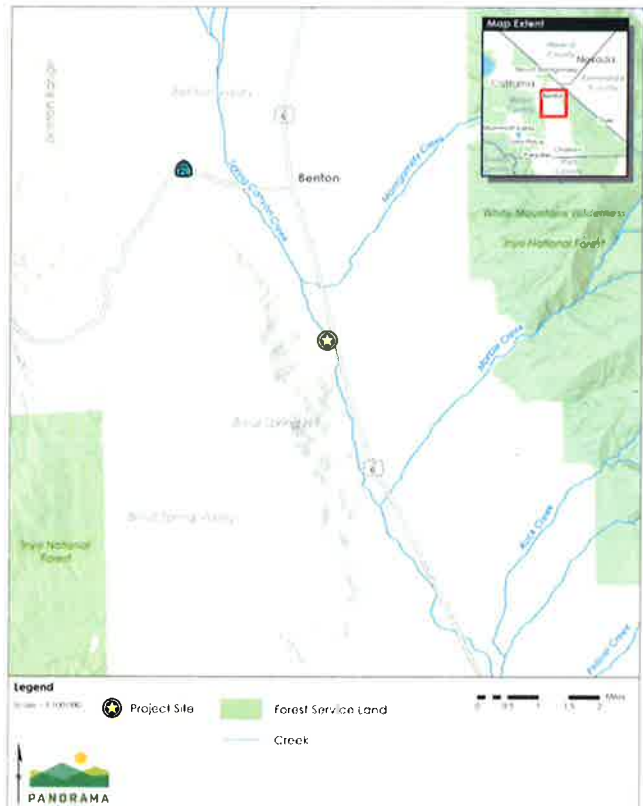
Dear Chairperson McFalls,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Specific Plan. The properties are APN 025-020-013 and 025-040-002, and are owned by one party.

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We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Walker River Reservation. Thank you for taking the time to consider this invitation.

Sincerely,



Michael Draper  
Planning Analyst  
760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

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March 4, 2022

James Rambeau, Chairperson  
P. O. Box 700  
Big Pine, CA, 93513  
[j.rambeau@bigpinepaiute.org](mailto:j.rambeau@bigpinepaiute.org)

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

Dear Chairperson Rambeau,

As lead agency, the Mono County Community Development Department (the County) is currently anticipating a General Plan Amendment to change the land use designation of two properties south of the community of Benton, CA, from Rural Residential to Specific Plan. The properties are APN 025-020-013 and 025-040-002, and are owned by one party.

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March 4, 2022

Allen Summers, Chairperson  
50 Tu Su Lane  
Bishop, CA, 93514

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

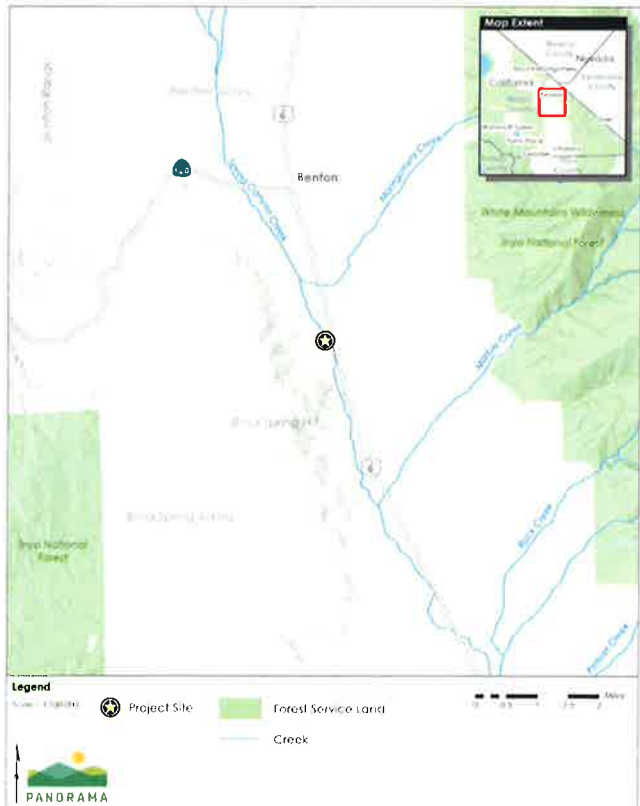
Dear Chairperson Summers,

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Michael Draper  
Planning Analyst  
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March 4, 2022

Kenneth Woodrow, Chairperson  
1179 Rock Haven Ct.  
Salinas, CA, 93906  
[kwood8934@aol.com](mailto:kwood8934@aol.com)

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,  
APOGEE FAMRS**

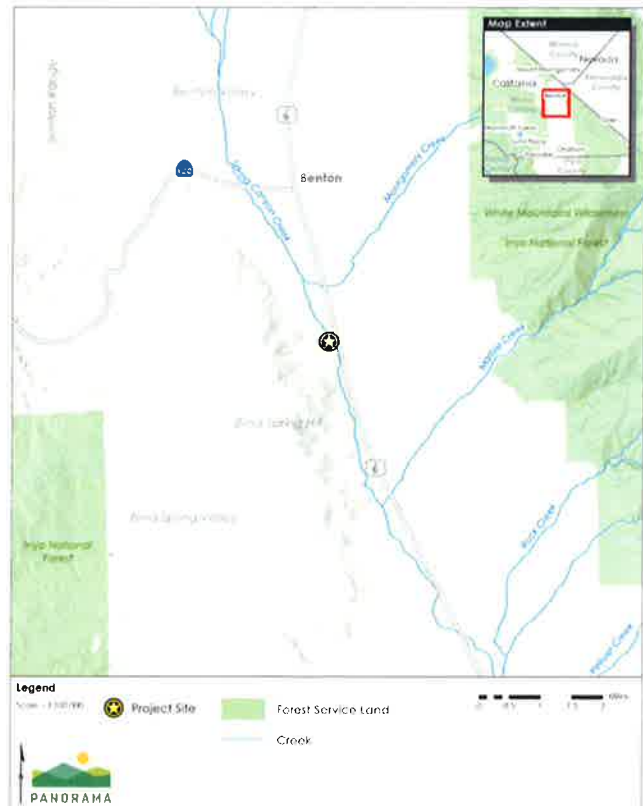
Dear Chairperson Woodrow,

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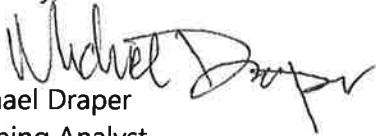
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We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Wuksache Indian Tribe/Eshom Valley Band. Thank you for taking the time to consider this invitation.

Sincerely,



Michael Draper  
Planning Analyst

760.924.1805, [mdraper@mono.ca.gov](mailto:mdraper@mono.ca.gov)

## Appendix E

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### Responses to Comments

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## E. Responses to Comments on the Draft IS/MND

### E.1 Overview

The California Environmental Quality Act (CEQA) Guidelines Section 15074 requires a Lead Agency (Mono County Community Development and Planning) to review and consider all comments received on the Draft IS/MND prior to making a determination on a proposed project. The purpose of this Response to Comments document is to provide responses to comments received on the Draft IS/MND, consistent with CEQA requirements. Responses to comments that do not relate to physical changes to the environment are provided for informational purposes only, to assist the County’s Board of Supervisors in determining an action on the project.

### E.2 Comments Received

Appendix D includes comments received during the circulation of the Draft Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the Apogee Farms Specific Plan, Cannabis Operations Permit, and Conditional Use Permit (project).

The Draft IS/MND was circulated for a 31-day public review period that began on July 15, 2022 and ended on August 15, 2022. The Mono County Community Development Department (County) received a total of three written comment letters during the public review period. Written comment letters are listed in Table E-1. Responses to written comments are provided in Section E.3.

**Table E-1 Letter Number and Commenter**

| Letter Number | Name of Commenter | Affiliation                                |
|---------------|-------------------|--|
| 1             | Lindsay Rains     | California Department of Cannabis Control  |
| 2             | Alisa Ellsworth   | California Department of Fish and Wildlife |
| 3             | Sherry Lisius     | U.S. Bureau of Land Management             |

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (for example, Response 1-1 indicates that the response is for the first issue raised in comment Letter 1).

## APPENDIX E - RESPONSES TO COMMENTS

Where appropriate, in response to the comments received, the text of the IS/MND has been revised. All changes are provided in the Final IS/MND. Text additions are indicated by underlined text. Deleted text is indicated by the use of ~~striketrough text~~. The changes are summarized in this section, where appropriate.



## E.3 Responses to Comments

### Letter 1: Lindsay Rains, California Department of Cannabis Control

Letter A1



Department of  
Cannabis Control  
CALIFORNIA

Gavin Newsom  
Governor

Nicole Elliott  
Director

August 11, 2022

Michael Draper, Planning Analyst III  
Mono County Community Development Department  
Planning Division  
P.O Box 347  
Mammoth Lakes, CA 93546  
cddcomments@mono.ca.gov

Re: Initial Study/Mitigated Negative Declaration (IS/MND) for Apogee Farms General Plan Amendment, Specific Plan, Cannabis Operation Permit and Conditional Use Permit Project (SCH No. 2021050252)

Dear Mr. Draper:

Thank you for providing the California Department of Cannabis Control (DCC) the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) prepared by the County of Mono for the proposed Apogee Farms project (Proposed Project).

DCC has jurisdiction over the issuance of licenses to cultivate, propagate and process commercial cannabis in California. DCC issues licenses to outdoor, indoor, and mixed-light cannabis cultivators, cannabis nurseries and cannabis processor facilities, where the local jurisdiction authorizes these activities. (Bus. & Prof. Code, § 26012(a).) All commercial cannabis businesses within the California require a license from DCC. For more information pertaining to commercial cannabis business license requirements, including DCC regulations, please visit: <https://cannabis.ca.gov/resources/rulemaking/>.

DCC expects to be a Responsible Agency for this project under the California Environmental Quality Act (CEQA) because the project will need to obtain one or more annual cultivation licenses and a distribution license from DCC. In order to ensure that the IS/MND is sufficient for DCC's needs at that time, DCC requests that a copy of the IS/MND, revised to respond to the comments provided in this letter, and a signed Notice of Determination be provided to the applicant, so the applicant can include them with the application package it submits to DCC. This should apply not only to this Proposed Project, but to all future CEQA documents related to cannabis cultivation applications in Mono County.

#### Background

Mono County is the Lead Agency on the Proposed Project. Mono County prepared a Notice of Preparation (NOP) and filed it with the State Clearinghouse on May 14, 2021, this can be found on the County's project website at: <https://www.monocounty.ca.gov/planning/page/apogee->

## APPENDIX E - RESPONSES TO COMMENTS

[farms-specific-plan-and-mitigated-negative-declaration](#). The California Department of Food and Agriculture submitted comments to the County regarding the NOP on June 14, 2021.<sup>1</sup> Although this NOP was for a focused EIR, it appears that an EIR was not prepared and an IS/MND was prepared instead. The project description also appears to be the same.

DCC has prepared general and specific comments, below, in response to the County's IS/MND, some of which reiterate the comments that were previously submitted to the County on June 14, 2021.

### General Comments (GCs)

#### *GC 1: Proposed Project Description*

Certain comments provided in the comment table below relate to providing additional detail regarding the description of the Proposed Project. In general, a more detailed project description would be helpful to DCC. The following information could make the IS/MND more informative if included in the Project Description:

1. Description of the size and location of any existing natural features, such as vegetation, water features (Spring Canyon Creek), and topography of the Proposed Project site.
2. Detailed description of operational activities that would occur within the described cultivation, processing, and distribution facilities, as well as any other structures that may be existing on the Project site;
3. Description of facility operations and maintenance including:
  - a. Hours of operation;
  - b. Any heavy equipment that will be used for cultivation operations, including tractors, forklifts, mowers, etc.; and
  - c. Any water efficiency equipment that would be used;

A1-1

#### *GC 2: Phasing*

The Project Description indicates that the Proposed Project would be constructed in three distinct phases. To the extent that these details are reasonably foreseeable, the IS/MND would be strengthened if it clarified how and/or whether corresponding operations would vary across phases of the project (e.g., variations in the number of employees hired, vehicle trips, equipment usage, and/or requirements for physical resources [e.g., water, energy]). DCC assumes that the IS/MND evaluates Proposed Project operations and maintenance activities as they are anticipated at full buildout (e.g., when all project phases have been completed). The IS/MND would be improved if the County clearly confirmed (or clarified) this assumption.

A1-2

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<sup>1</sup> On July 12, 2021, CDFA merged with the other state cannabis business licensing agencies, the Bureau of Cannabis Control and the Office of Manufactured Cannabis Safety, to form a new single state department, the California Department of Cannabis Control.

## APPENDIX E - RESPONSES TO COMMENTS

### **GC 3: Acknowledgement of DCC Regulations**

The IS/MND acknowledges that the Proposed Project requires cultivation licenses from DCC. The IS/MND could be improved if it acknowledged that DCC is responsible for licensing, regulation, and enforcement of commercial cultivation activities, as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and DCC regulations related to cannabis cultivation (Bus. & Prof. Code, § 26102(a)). Additionally, the IS/MND's analysis could benefit from discussion of the protections for environmental resources provided by DCC's cultivation and distribution regulations. In particular, the impact analysis for each of the following resource topics could be further supported by a discussion of the effects of state regulations on reducing the severity of impacts for each applicable topic:

- Aesthetics (See 4 California Code of Regulations §16304(a).)
- Air Quality and Greenhouse Gas Emissions (See §§ 15020(f); 16304(e); 16305; 16306.)
- Biological Resources (See §§ 15006(i); 15011(a)(11); 16304(a-c); 16304(g).)
- Cultural Resources (See § 16304(d).)
- Energy (See §§ 15006(i)(6); 15011(a)(5); 15020(f); 16305; 16306.)
- Hazards and Hazardous Materials (See §§ 15006(i)(5)(c); 15011(a)(4); 15011(a)(12); 16304(f); 16307; 16310.)
- Hydrology and Water Quality (See §§ 15006(i); 15011(a)(3); 15011(a)(7); 15011(a)(11); 16216; 16304(a); 16304(b); 16307; 16310.)
- Noise (See §§ 16304(e); 16306.)
- Public Services (See §§15011(a)(10); 15036; 15042.)
- Utilities and Service Systems (See §§ 16309; 17223.)
- Wildfire (See § 15011(a)(10).)
- Cumulative Impacts (related to the above topics)

A1-3

### **GC 4: Site-Specific Reports and Studies**

The IS/MND references certain project-specific plans, studies, and project-specific data, including a Biological Survey, Cultural Resources records search, and an Archaeological Survey. To ensure that DCC has supporting documentation for the IS/MND, DCC requests that the County advise applicants to provide copies of all project-specific plans and supporting documentation with their state application package(s) for any annual cannabis business license(s) to DCC.

A1-4

### **GC 5: Evaluation of Cumulative Impacts**

It is important for CEQA analysis to consider the cumulative impacts of cannabis cultivation in Mono County as a whole, whether projects are existing or proposed. Of particular importance are topics for which the impacts of individual projects may be less than significant, but where individual projects may make a considerable contribution to a significant cumulative impact. These topics include, but are not limited to:

A1-5

## APPENDIX E - RESPONSES TO COMMENTS

- cumulative impacts from groundwater diversions on the health of the underlying aquifer, including impacts on other users and impacts on stream-related resources connected to the aquifer;
- cumulative impacts related to transportation; and
- cumulative impacts related to air quality and objectionable odors.

The IS/MND would be improved by acknowledging and analyzing the potential for cumulative impacts resulting from the Proposed Project coupled with other cannabis cultivation projects being processed by the County, and any other reasonably foreseeable projects in Mono County that could contribute to cumulative impacts similar to those of the Proposed Project.

### Specific Comments and Recommendations

In addition to the general comments provide above, DCC provides the following specific comments regarding the analysis in the IS/MND.

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## APPENDIX E - RESPONSES TO COMMENTS

| Comment No. | Section Nos. | Page No(s).  | Resource Topic(s)                                     | IS/MND Text   | DCC Comments and Recommendations  |
|-------------|--------------|--------------|---|---|---|
| 1           | 2.2          | 2-1          | Land Use Designation and Surrounding Land Uses        | N/A (General Comment)   | The document would be improved if it described both general plan land use designations and zoning designations, as well as existing land uses for the Proposed Project and adjacent properties. |
| 2           | 2.3          | 2-1          | Access  | All project site access roads would be improved to comply with the regulations set forth in Chapter 22 of the County's General Plan, related to fire safety.  | The IS/MND would be improved if it explained if the improvement of these roads would include paving or other surfacing.   |
| 3           | 2.4.2        | 2-7 And 2-10 | Commercial Cannabis Cultivation Facility – Use Permit | The greenhouses would be used for indoor cannabis cultivation.<br><br>And..<br><br>Lighting in the greenhouses would be used only to extend the light cycle for vegging <sub>2</sub> cannabis plants when daylight hours are limited and not sufficient for the growing plants. | The IS/MND would be improved if it clarified whether indoor or mixed-light cultivation techniques would occur inside the proposed greenhouses.  |
| 4           | 2.4.4        | 2-11         | Facility Operation – Cannabis Operation               | The cuttings would be transported to cultivation areas  | Please note that separate licenses from DCC are required for indoor, outdoor, and mixed-light cultivation activities.   |

A1-6

A1-7

A1-8

A1-9

## APPENDIX E - RESPONSES TO COMMENTS

| Comment No. | Section Nos. | Page No(s). | Resource Topic(s)                 | IS/MND Text   | DCC Comments and Recommendations  |
|-------------|--------------|-------------|-----------------------------------|---|---|
|             |              |             |                                   | which may include the outdoor cultivation areas, or to greenhouses for replanting.  |   |
| 5           | 2.5          | 2-13        | Agency Jurisdiction and Approvals | N/A (General Comment)   | The IS/MND would be more informative if it stated that a distribution license would also be needed from DCC.  |
| 6           | 3.2 (c)      | 3-4         | Aesthetics                        | Downcast, fully shielded lighting, with no light emitted above the horizontal plan would eliminate unnecessary night sky illumination, in accordance with CCR Title 3, §§ 8304(c) and 8304(g), general environmental requirements for cannabis cultivation program. | Please note that DCC regulations have been updated and may be found at California Code of Regulations, title 4, section 15000 et seq.   |
| 7           | 3.4 (b)      | 3-9         | Air Quality                       | Operational emissions would result from energy use to operate the greenhouses and other facilities, vehicle trips to and from the project site, and the proposed back-up generator.   | Although much of this information may be included in Appendix B, the IS/MND would be improved if it provided a summary of the sources of the operational emissions that would result from energy use to operate the greenhouses and other facilities (lighting, HVAC, odor control equipment, cultivation equipment, security cameras, etc.). |

A1-10

A1-11

A1-12

## APPENDIX E - RESPONSES TO COMMENTS

| Comment No. | Section Nos. | Page No(s). | Resource Topic(s)    | IS/MND Text  | DCC Comments and Recommendations  |
|-------------|--------------|-------------|----------------------|--|---|
| 8           | 3.4 (b)      | 3-9         | Air Quality          | Operation of the cannabis facility would comply with the GBUAPCD rules described above, which would require use of control measures to minimize fugitive dust and particulate matter emissions.  | The IS/MND would be improved if it addressed anticipated dust and particulate emissions that could result from cannabis cultivation operations and routine maintenance at the project site, including the use of delivery trucks and employee vehicles on dirt and gravel roads.  |
| 9           | 3.5          | 3-14        | Biological Resources | On November 8, 2019, biologist Russell Kokx conducted a reconnaissance-level survey of the 80-acre project site. The reconnaissance survey documented the environmental settings, including vegetative communities, soils, elevations, habitats, and conditions. | The document would be more informative if it provided the Biological Survey used to support impact conclusions of the IS/MND. DCC requests that the County advise applicants to provide copies of all project-specific plans and supporting documentation with their state application package(s) for any annual cannabis business license(s) to DCC. (See GC 4.) |
| 10          | 3.5 (b)      | 3-21        | Biological Resources | N/A (General Comment)  | Mitigation Measure BIO-2 and BIO-3 appear to contradict each other. Mitigation Measure BIO-2 states that there shall be no future development under the Specific Plan within riparian habitats, streams, or sensitive habitats. However, Mitigation Measure BIO-3 requires compensation mitigation for any permanent impacts on riparian habitat                  |

A1-13

A1-14

A1-15

## APPENDIX E - RESPONSES TO COMMENTS

| Comment No. | Section Nos. | Page No(s). | Resource Topic(s)  | IS/MND Text  | DCC Comments and Recommendations  |
|-------------|--------------|-------------|--------------------|--|---|
|             |              |             |                    |  | <p>because the cannabis facility will require upgrades to the existing access road, which crosses Spring canyon Creek. The document would be improved if it provided an explanation of how these two mitigation measures would be implemented.</p> <p>Furthermore, the stream and riparian habitat impacts from regular operational trips on the access road, as well as any required maintenance of the access road should also be addressed here.</p> |
| 11          | 3.6 (a)      | 3-29        | Cultural Resources | <p><b>Mitigation Measure CUL-1: Cultural Resources Preservation and Treatment</b><br/>                     Exclusion fencing shall be established and maintained around any eligible cultural resources including a 100-foot buffer from the outer limits of any known surface deposits.</p> | <p>Table 3-7 of this IS/MND identifies one “eligible” resource as well as three “potentially eligible” cultural resources. The IS/MND would be improved if this mitigation measure clarified whether it would be applicable to potentially eligible resources, and/or how potentially eligible resources would be managed or avoided as part of the Proposed Project.</p>   |
| 12          | 3.7 (a)      | 3-33        | Energy             | <p>During operation of the cannabis facility, the indoor cultivation facility would require the use of special lighting, ventilation, and air conditioning systems. Although the</p>   | <p>CEQA does not consider the economic impacts of projects. The IS/MND would be improved if it estimated the amount of energy the Proposed Project would require for operational components such as lighting, HVAC systems, odor control equipment, cameras, pumps, video surveillance. This</p>  |

A1-16

A1-17



## APPENDIX E - RESPONSES TO COMMENTS

| Comment No. | Section Nos. | Page No(s). | Resource Topic(s)               | IS/MND Text   | DCC Comments and Recommendations  |
|-------------|--------------|-------------|---------------------------------|---|---|
|             |              |             |                                 | cannabis facility and some allowable uses may involve substantial energy use, production of commodities would be beneficial to the California economy and outweigh the quantity of energy consumed.     | information should then be compared to relevant thresholds of significance.<br><br>Additionally, the IS/MND would be more informative if it included an analysis of any expected use of the emergency generator.  |
| 13          | 3.7 (b)      | 3-33        | Energy                          | N/A (General Comment)   | The document would be strengthened if it described how the Proposed Project will comply with DCC regulations relating to the use of renewable energy in cultivation projects. (Cal. Code Regs., tit. 4 § 16305.)  |
| 14          | 3.10 (a)     | 3-41        | Hazards and Hazardous Materials | N/A (General Comment)   | The IS/MND would be improved if included a description of the storage location and conditions for any pesticides, fertilizers, fuels, and other agricultural chemicals that would be used at the project site.  |
| 15          | 3.10 (a)     | 3-41        | Hydrology and Water Quality     | Operation of the cannabis facility would necessitate obtaining coverage under the Cannabis Cultivation General Order (CCGO; Order WQ 2019-0001-DWQ)) from the SWRCB, in accordance with Section 8102(P) | The document would be improved if it described any elements of the Proposed Project that could impact water quality (including wastewater, agricultural runoff, stormwater, and/or use of chemicals or hazardous materials) and provided an analysis of whether those elements would have impacts on water quality. |

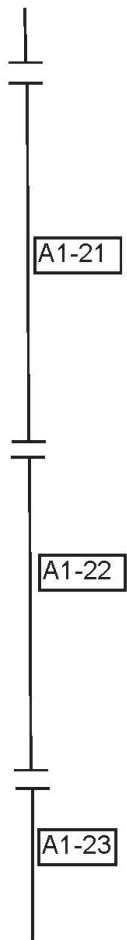
A1-18

A1-19

A1-20

## APPENDIX E - RESPONSES TO COMMENTS

| Comment No. | Section Nos. | Page No(s). | Resource Topic(s)                  | IS/MND Text   | DCC Comments and Recommendations  |
|-------------|--------------|-------------|------------------------------------|---|---|
|             |              |             |                                    | under Title 3 of the CCR.   |   |
| 16          | 3.20 (b)     | 3-62        | Utilities and Service Systems      | The use of groundwater for the cannabis facility would not exceed water supplies in the basin during normal, dry, or multiple dry years.  | <p>The IS/MND would be improved if it provided data regarding anticipated groundwater supplies during dry and multiple dry years and included an analysis of whether there are sufficient groundwater supplies to serve the Proposed Project and reasonably foreseeable future development during dry and multiple dry years.</p> <p>In addition, the document would be improved if it referenced the state's requirements regarding proposed water sources and groundwater use (Cal. Code Regs. tit.4, §§ 15011(a)(7); 16311).</p> |
| 17          | 3.20 (b)     | 3-63        | Utilities and Service Systems      | The cannabis facility would not generate a substantial volume of solid waste that could not be accommodated at Benton Crossing Landfill, based on the small volume of waste that would be generated from the cannabis facility. | The IS/MND would be strengthened if it quantified the anticipated solid waste generation and described the available disposal streams and also described the capacity of the existing landfill.   |
| 18          | 3.22 (b)     | 3-67        | Mandatory Findings of Significance | N/A (General Comment)   | The IS/MND would be more informative if it identified whether any other cannabis growing operations that exist or have been proposed in the vicinity of the Proposed Project, and whether the Proposed Project would make a considerable contribution to  |



## APPENDIX E - RESPONSES TO COMMENTS

Department of Cannabis Control

August 11, 2022 – Comments re Apogee Farms (SCH No. 2021050252) | Page 11

| Comment No. | Section Nos. | Page No(s). | Resource Topic(s) | IS/MND Text | DCC Comments and Recommendations                              |
|-------------|--------------|-------------|-------------------|-------------|---|
|             |              |             |                   |             | any cumulative impacts from these other projects. (See GC 5.) |

1

## APPENDIX E - RESPONSES TO COMMENTS

### Conclusion

DCC appreciates the opportunity to provide comments on the IS/MND for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Kevin Ponce, Senior Environmental Scientist Supervisor, at (916) 247-1659 or via e-mail at [Kevin.Ponce@cannabis.ca.gov](mailto:Kevin.Ponce@cannabis.ca.gov).

Sincerely,

**Rains, Lindsay@Cannabis** Digitally signed by Rains, Lindsay@Cannabis  
Date: 2022.08.11 15:45:46 -07'00'

Lindsay Rains  
Licensing Program Manager

## APPENDIX E - RESPONSES TO COMMENTS

### Response to Comment A1-1

The comment requests additional information in the project description. The requested information is included in the IS/MND as follows:

1. A description of the existing natural features is provided in the Sections 3.5 Biological Resources, 3.8 Geology and Soils, and 3.11 Hydrology and Water Quality of the IS/MND.
2. A description of the operational activities is provided in Section 2.4.4 Facility Operation of the IS/MND. There are no existing structures on the site.
3. A description of facility operations and maintenance including equipment operation and water use is provided in Section 2.4.4 of the IS/MND.

### Response to Comment A1-2

The comment requests additional details on the phasing and verification that the IS/MND analyzes the full build out of the project.

The Project Description indicates that the greenhouses may be constructed in up to three phases. The IS/MND analyzes the project operational impacts at full build out.

### Response to Comment A1-3

The comment requests additional acknowledgement of DCC regulations throughout the EIR. The County notes that DCC's regulations is separate from the County's land use regulation. The DCC can require additional information in its permit process. References to the DCC permit application requirements are not included in the IS/MND impact analysis as the application itself does not specifically reduce impacts on the environment. The County has added additional references to DCC regulations where they are relevant to the analysis of environmental effects under CEQA. The additional references to DCC regulations incorporated in the IS/MND text are noted below:

- Page 3-4      Downcast, fully shielded lighting, with no light emitted above the horizontal plan would eliminate unnecessary night sky illumination, in accordance with CCR Title 3, §§ 8304(c) and 8304(g), general environmental requirements for cannabis cultivation program and CCR §16304 (a)(7) which requires that lights are shielded from sunrise to sunset.
- Page 3-11     Generator use would comply with California Air Resources Board and GBUAPCD regulations including acquiring a permit if the generator exceeds 900 brake horsepower and airborne toxic control measures for generators (CCR Title 17 §93115 and CCR Title 4 §16306).
- Page 3-38     In addition, the project would need to comply with CCR Title 4 §16305.
- Page 3-41     Pesticides that would be used in cultivation operations would be approved for use on cannabis by the State and Inyo-Mono Agricultural Commissioner's office and would comply with Sections 8304(f) and 8307 under Title 3 of the CCR and

## APPENDIX E - RESPONSES TO COMMENTS

[Title 4 §16307](#), related to pesticide use requirements of the cannabis cultivation program.

Page 3-63 All project-related waste would be disposed at permitted solid waste facilities and in accordance with local and State regulations [including CCR Title 4 §17223](#).

### **Response to Comment A1-4**

The comment requests that the County advise applicants to provide copies of project-specific plans and supporting documentation with their state application package. It is noted that the DCC will require additional information in its permit application process. The County does not advise applicants on procedures for compliance with other agencies' regulations. The County has no jurisdiction over DCC's permit process.

### **Response to Comment A1-5**

The comment requests that the County evaluate cumulative impacts of the project in combination with other cannabis cultivation. A cumulative impact analysis is provided in Section 3.22 of the IS/MND. No other cannabis projects are planned or permitted in the same valley as the proposed project. The nearest planned cannabis facility is the Bask Ventures project located in the Sierra Business Park, approximately 20 miles from the proposed facility and would not result in cumulative impacts in combination with the proposed project.

### **Response to Comment A1-6**

The existing and proposed General Plan land use designations are described in Table 2-1. The County's land use designations are the same as its zoning designations.

### **Response to Comment A1-7**

Table 2-3 of the IS/MND states that the access roads would be graveled. Under heading "Roads and Parking" the IS/MND states that the access road would be unpaved.

### **Response to Comment A1-8**

The comment requests clarification on the proposed lighting. Lighting is discussed in the IS/MND under heading "Lighting, Signage, and Fencing". Refer to page 2-8 of the IS/MND.

### **Response to Comment A1-9**

The comment notes that separate licenses for DCC are required for indoor, outdoor, and mixed-light cultivation activities. The comment is noted.

### **Response to Comment A1-10**

The comment notes that a distribution license would also be needed from DCC. The cannabis distribution license was added to Table 2-4 in the Final IS/MND.

### **Response to Comment A1-11**

It is noted that DCC regulations have been updated. A reference to DCC regulations has been added to page 3-4 as noted in response to comment A1-3.

## APPENDIX E - RESPONSES TO COMMENTS

### Response to Comment A1-12

The comment states the IS/MND would be improved if it included a summary of the sources of operational emissions. The sources of operational emissions are discussed on page 3-9 of the IS/MND and the details of the operational emissions are presented in Table 3-2 and Appendix B.

### Response to Comment A1-13

The comment states that the IS/MND would be improved if it addressed anticipated dust and particulate emissions from operations. The operational PM<sub>10</sub> and PM<sub>2.5</sub> emission are presented in Table 3-2 of the IS/MND. Calculations for construction and operational fugitive dust are provided in Appendix B. The project will include placement of gravel on the access road to reduce dust. The total area of grading would be 0.54 acre and the total area of land disturbance during construction would be 1.33 acre. Due to the small size of the area of earth work and disturbance the project would not create substantial dust.

### Response to Comment A1-14

The comment requests that the biological survey report be provided with the IS/MND. The results of the reconnaissance biological survey are presented in the Biological Resources section of the IS/MND. The Focused Rare Plant Survey report is provided in Appendix C. See also response to comment A1-4 regarding DCC's separate permit jurisdiction.

### Response to Comment A1-15

The comment indicates that Mitigation Measure BIO-2 and BIO-3 contradict each other. Mitigation Measure BIO-2 refers to impacts to the ephemeral stream that would occur through the current cannabis use. Mitigation Measure BIO-3 would apply to future development under the Specific Plan and General Plan Amendment separate from the current cannabis facility proposal. Refer to the impact analysis on pages 3-20 and 3-21 of the IS/MND. Operational trips on the access road would not cause loss of any stream or riparian habitat.

### Response to Comment A1-16

The comment states that the IS/MND should clarify whether the cultural resource mitigation applies to eligible and potentially eligible resources. The mitigation has been revised as follows for clarity. The text of Mitigation Measure CUL-1 is revised as follows:

Exclusion fencing shall be established and maintained around any eligible and potentially eligible cultural resources including a 100-foot buffer from the outer limits of any known surface deposits.

### Response to Comment A1-17

The comment states that the CEQA document should estimate the energy use of the project. The project's energy use is estimated in Appendix B of the IS/MND. The CEQA Guidelines Appendix G question is whether the project will result in wasteful or inefficient use of energy. The analysis of energy use addresses the Appendix G question.

## APPENDIX E - RESPONSES TO COMMENTS

### **Response to Comment A1-18**

The comment suggests that the document would be strengthened if it described how the Proposed Project will comply with DCC regulations for renewable energy. The Energy question in CEQA Guidelines Appendix G does not require evaluation of renewable energy. The County is not responsible for enforcing DCC regulations.

### **Response to Comment A1-19**

The comment suggests the IS/MND should include a description of the storage location for agricultural chemicals. The IS/MND discusses that hazardous materials would be stored in compliance with state and federal laws. A very low volume of agricultural chemicals that would be used for the project. The use and storage of these chemicals is governed by regulations.

### **Response to Comment A1-20**

The comment recommends providing a description of project elements that could impact water quality. The analysis of water quality impacts for both project construction and operation is provided on pages 3-45 and 3-46. The project is a small operation that involves very limited activities that have the potential to impact water quality.

### **Response to Comment A1-21**

The comment requests additional information on groundwater supplies and reference to DCC regulations. The IS/MND provides information on groundwater supplies from the groundwater basin consistent with published documents. The IS/MND provides sufficient information to demonstrate that the basin has significantly more water available than the 0.7 acre-foot required for the project. Given the low volume of water required for the operation, additional information is not required. As stated previously, the County is not in the position of enforcing compliance with DCC regulations.

### **Response to Comment A1-22**

The comment requests quantification of the solid waste generation. The scale of the proposed operation is such that it would not exceed the available landfill capacity. As discussed on page 2-12, the project includes composting of green waste on site to reduce the total waste generation.

### **Response to Comment A1-23**

The comment requests a cumulative impact analysis with other cannabis operations. See response to comment A1-5.



## APPENDIX E - RESPONSES TO COMMENTS

### Letter 2: Alisa Ellsworth, California Department of Fish and Wildlife

Letter A2



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C220  
Ontario, CA 91764  
[wildlife.ca.gov](http://wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



August 11, 2022

*Sent via email*

Michael Draper, Planning Analyst II  
Mono County Department of Community Development  
P.O Box 347  
1290 Tavern Road  
Mammoth Lakes, CA 93546

Subject: Initial Study/Mitigated Negative Declaration  
Apogee Farms General Plan Amendment and Cannabis Facility Project  
State Clearinghouse No. 2021050252

Dear Mr. Draper:

The California Department of Fish and Wildlife (CDFW) received an Initial Study/Mitigated Negative Declaration (IS/MND) from the County of Mono (County) for the Apogee Farms General Plan Amendment and Cannabis Facility Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### **CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants,

<sup>1</sup>CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

*Conserving California's Wildlife Since 1870*

## APPENDIX E - RESPONSES TO COMMENTS

Michael Draper, Planning Analyst II  
County of Mono  
August 11, 2022  
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and habitat necessary for biologically sustainable populations of those species. (Id., § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

### PROJECT DESCRIPTION SUMMARY

The Project site is located at 23555 Highway 6 (west of Highway 6 and south of Highway 120) in the city of Benton, California within Mono County; Latitude 37.78235 N and Longitude -118.46837 W. The Project proposes the construction and operation of a commercial cannabis production, processing, and distribution facility with the owner/operator living onsite. The Project site comprises approximately 78.45 acres on Assessor's Parcel Numbers (APNs) 025-020-013-000 and 025-040-002-000. The Project also includes a Specific Plan and General Plan Amendment to the Mono County 2015 General Plan Land Use Map to eliminate the existing Rural Residential (RR-40) designation and redesignate the two APNs on the Project site as Agricultural (AG-40).

The processing facility will be a steel structure constructed on a concrete foundation with a maximum height of 20 feet. Three greenhouses will be constructed southeast of the processing facility within the cultivation area and will be used for cannabis cultivation. The greenhouse facility will be made of steel posts and beams with clear plastic walls and ceilings. The total area of cultivation will be less than 10,000 square feet within the fenced 23,400-square-foot cultivation area. An approximately 320-square-foot storage house will be constructed northwest of the greenhouses within the cultivation area with a maximum height of 12 feet. The storage house will be constructed of treated

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wood with insulation on a concrete foundation. The storage house will be used for storage of water tanks, fertilizers, and other materials related to cannabis cultivation. The Project will include improvements (e.g., widening) to the access road from Highway 6 to meet County standards for ingress and egress. The access road to the cannabis facility and the power line for the cannabis facility will cross Spring Canyon Creek and two other ephemeral drainages on-site.

Timeframe: Unavailable

### COMMENTS AND RECOMMENDATIONS:

The IS/MND discloses that a biological database search of several sources, including U.S. Fish and Wildlife Service, California Natural Diversity Database, California Native Plant Society, and National Wetland Inventory was conducted in May 2019 to determine which species had potential to occur onsite. The database search was followed by a reconnaissance-level survey conducted by biologist Russell Kokx on November 8, 2019, to document the environmental settings and to evaluate the potential for special-status species to occur; however, the results and methods of the reconnaissance-level survey were not provided. The IS/MND discloses that the final determination for species with potential to occur was made based upon known or expected occurrences within the area and whether the Project site or immediate vicinity contained suitable habitat. The IS/MND also disclosed that species “whose known distribution, habitat, or elevation range precluded a possible occurrence in the project vicinity” were not given further consideration and those “with relatively low probability for occurrence were retained for further evaluation because of incomplete knowledge about the range and/or habitat of certain species”.

As such, it was determined that a total of fourteen (14) special-status plant species and seven (7) special-status wildlife species had potential to occur onsite and are listed in Table 3-3 of the IS/MND, titled “Special-Status Species with Potential to Occur in the Project Site”. Among the special-status plants determined to have potential to occur included: alkali ivesia (*Ivesia kingii* var. *kingii*; State Rare Plant Rank [SRPR] 2B.2), Inyo County star-tulip (*Calochortus excavates*, SRPR 1B.1), fiddleleaf hawksbeard (*Crepis runcinate*, SRPR 2B.2), Inyo phacelia (*Phacelia inyoensis*, SRPR 1B.2) and dwarf monolepis (*Micromonolepis pusilla*, SRPR 2B.3). Among the special-status wildlife species determined to have potential to occur include Loggerhead Shrike

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(*Lanius ludoviscianus*, CDFW Species of Special Concern [SSC]) and Swainson's Hawk (*Buteo swainsonii*, State Threatened).

Focused botanical surveys were then conducted on May 27 and June 17, 2020, and followed *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (California Department of Fish and Game, 2009), *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants* (U.S. Fish and Wildlife Service, 1996), and *Botanical survey guidelines of the California Native Plant Society* (California Native Plant Society, 2001). The survey methods and results were provided in Appendix C of the IS/MND, and it was reported that no special-status plant species were observed onsite. As such, CDFW appreciates that focused botanical surveys, were appropriately conducted for sensitive plants with potential to occur but is concerned that focused surveys were not conducted for special-status wildlife species with potential to occur onsite, including burrowing owl (*Athene cunicularia*, SSC) and Owens Valley vole (*Microtus californicus vallicola*, SSC). Burrowing owl is widespread throughout California, is associated with agricultural fields such as those adjacent to the Project site and prefers open areas with short vegetation and sparse shrubs, such as that occurring onsite. Owens Valley Vole is found within habitat that includes grasses, sedges, riparian scrub, and waterways (e.g., natural stream courses), which the Project site provides. Further, vole activity in the area surrounding the Project site has been observed by CDFW. Therefore, CDFW recommends conducting pre-construction surveys for burrowing owl and Owens Valley vole as per below in biological (BIO) Mitigation Measure (MM) BIO-4 and MM BIO-6, respectively.

The IS/MND also discloses that the Project site encompasses Spring Canyon Creek and two ephemeral drainages, although no jurisdictional delineation was conducted. The IS/MND states that the access road and the power line for the cannabis facility will impact Spring Canyon Creek and the two ephemeral drainages onsite. As such, CDFW appreciates the inclusion of MM BIO-2 and MM BIO-3 in the IS/MND to mitigate for impacts to riparian habitat and to prevent future development from impacting fish and wildlife resources under the Project's Specific Plan, respectively. CDFW offers minor revisions to MM BIO-2 and MM BIO-3, as per below, to consider Fish and Game Code section 1602, including notification of Lake and Streambed Alteration.

The IS/MND describes that water for the Project, including construction and operation will be sourced from the existing onsite well and estimates that

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groundwater use will be approximately 600 gallons per day. The MND states that because 600 gallons per day is less than the daily average residential water use of 780 gallons per day in Mono County, the Project's water demand will not substantially decrease groundwater supplies. Absent a proper analysis, CDFW cannot agree that the Project will not substantially decrease groundwater supplies and is therefore concerned with the Project's impacts to groundwater and consequently potential impacts to Fish Slough. Fish Slough is considered an Area of Critical Concern by the Bureau of Land Management and supports fourteen (14) special-status plants including the endemic Fish Slough milk-vetch (*Astragalus lentiginosus var. piscinensis*, Federally Threatened; SRPR 1B.1: Rare or Endangered in California and elsewhere), and approximately 90% of Owens pupfish (*Cyprinodon radiosus*, Federally and State Endangered). Fish Slough is 100% dependent on groundwater discharge.

According to the IS/MND, the Project site is underlain by the Owens Valley groundwater basin (basin) and is located within the Tri Valley area of the Owens Valley groundwater basin. The basin's Groundwater Sustainability Plan (GSP) developed by the Owens Valley Groundwater Authority (OVGA) discusses that the declines in groundwater elevation in the Tri-Valley area could affect Fish Slough. Although CDFW understands that the GSP or OVGA has no regulatory authority over the Project, CDFW recommends that the Project applicant coordinate with OVGA to develop and implement best management practices and other actions to identify and avoid undesirable conditions in the operation and maintenance of the onsite well and to demonstrate the project will not contribute to cumulative impacts to Fish Slough from groundwater decline at the Project site.

A2-3

Cannabis cultivation and related activities require large quantities of water, which can impact sensitive groundwater-dependent species and ecosystems such as Fish Slough, Owens pupfish, and Fish Slough milk-vetch. Although the IS/MND analyzes impacts of the Project on groundwater liquefaction, it does not properly analyze the potential for the Project to decrease groundwater supplies. CDFW recommends that the final MND include an analysis of impacts of the Project on groundwater supplies and groundwater-dependent species and ecosystems, such as Fish Slough, Owens pupfish, and Fish Slough milk-vetch. The final MND should also include an analysis of cumulative impacts (e.g., groundwater overdraft and degradation of and or loss of habitat). Additionally, per the Cannabis Cultivation Policy (State Water Resources Control Board, February 2019), please note that records of daily water usage for irrigation of cannabis

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must be maintained for 5 years and readily available for review by the State Water Resources Control Board (SWRCB) and CDFW.

Considering all of the above, CDFW recommends: (1) a jurisdiction delineation be conducted and provided with the final MND and to CDFW via notification of Lake and Streambed Alteration and (2) the revision of MM BIO-1, MM BIO-2, and MM BIO-3 and the adoption of MM BIO-4, MM BIO-5, and MM BIO-6 as per below and also found in Attachment 1 (Mitigation Monitoring and Reporting Program) for adoption in a final IS/MND.

A2-4

### Biological Mitigation Measures

#### Nesting Birds

CDFW appreciates the inclusion of MM BIO-1 to mitigate for impacts to nesting birds and offers the following revisions below (edits are in ~~striketrough~~ and **bold**):

#### MM BIO-1:

A preconstruction survey shall be performed prior to construction. The following measures shall be implemented:

- Use of heavy equipment, grading, demolition, construction, and/or tree removal, shall avoid the nesting season to the greatest extent feasible.
- ~~If use of heavy equipment, grading, demolition, construction, and/or tree removal are scheduled to occur during the nonbreeding season (September 1 through February 15), no measures are required.~~
- ~~If construction activities occur during the nesting season,~~ **Regardless of the time of year**, a preconstruction survey for active bird nests in the ~~project site~~ shall be conducted on the project site and within 500 feet of the project site by a qualified biologist ~~approved by the County~~ **no more than three (3) calendar days prior to initiating all Project activities. Surveys shall include any potential habitat, including trees, shrubs, the ground, or nearby structures that might be impacted by activities that may cause nest destruction or abandonment.**
  - ~~-If no nesting or breeding behavior is observed, construction may proceed.~~
  - ~~-If an active nest is detected a determination shall be made by a qualified biologist as to whether construction work could affect the active~~

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~~nest. If it is determined that construction would not affect an active nest, work may proceed. If it is determined that construction activities are likely to impair the successful rearing of the young, a 'no-disturbance buffer' in the form of orange mesh Environmentally Sensitive Area (ESA) fencing shall be established around occupied nests to prevent destruction of the nest and to prevent disruption of breeding or rearing behavior. The extent of the 'no-disturbance buffer' shall be **no less than 300 feet (500 feet for raptors), a smaller buffer may be** determined by a qualified biologist in consultation with CDFW. 'No-disturbance buffers' shall be maintained until the end of the breeding season or until a qualified wildlife biologist has determined that the nestlings have fledged. A qualified wildlife biologist shall inspect the active nest to determine whether construction activities are disturbing to the nesting birds or nestlings. If the qualified wildlife biologist determines that construction activities pose a disturbance to nesting, construction work shall be stopped in the area of the nest, and the 'no-disturbance buffer' expanded.~~

### **Fish and Game Code Section 1602**

CDFW is concerned about the IS/MND's confirmed impacts to Fish and Game Code section 1602 resources from construction and improvements to the access road and installation of power lines for the cannabis facility. Although the IS/MND acknowledges that development within streams onsite could require a Lake and Streambed Alteration Agreement (LSAA), mitigation proposed (i.e., MM BIO-2) does not consider notification of Lake and Streambed Alteration. Please note that the Department for Cannabis Control (DCC) requires cannabis cultivators to demonstrate compliance with Fish and Game Code section 1602 prior to issuing a cultivation license (Business and Professions Code, § 26060.1). To qualify for an Annual License from DCC, cultivators must have an LSAA or written verification from CDFW that one is not needed. Cannabis cultivators may apply online for an LSAA through the Environmental Permit Information Management System (EPIMS) at <https://epims.wildlife.ca.gov> and learn more about permitting at <https://wildlife.ca.gov/Conservation/Cannabis/Permitting>.

Nonetheless, CDFW appreciates the inclusion of MM BIO-2 to mitigate for impacts to riparian habitat onsite. Lamentably, MM BIO-2 does not consider impacts to streambed, bank, or channel and per Fish and Game Code section 1602: "An entity shall not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of any,

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river, stream, or lake...". Thus, CDFW recommends that the final MND include the below revisions to MM BIO-2 to consider notification of Lake and Streambed Alteration pursuant to Fish and Game Code 1602 (edits are in ~~strike through~~ and **bold**):

### MM BIO-2:

If construction activities impact riparian habitat **and/or Fish and Game Code section 1602 resources**, the permanent loss of riparian habitat **and/or Fish and Game Code section 1602 resources** shall be compensated **as determined by the California Department of Fish and Wildlife (CDFW) through a Lake and Streambed Alteration Agreement** through ~~on-site enhancement or establishment of riparian habitat~~; **one or more of the following: on-site restoration; purchase of mitigation bank credits from a CDFW-approved mitigation bank; and/or land acquisition, management and conservation in perpetuity, and funding thereof**. Permanent impacts to riparian habitat shall be compensated ~~through enhancement of riparian areas~~ at a minimum 2:1 ratio (~~acres mitigated enhancement: acres impacted~~) **or as determined by CDFW during project analysis after receiving notification for a Lake and Streambed Alteration Agreement or creation of riparian areas at a minimum 21:1 ratio**. All areas of temporary impact will be restored to preconstruction contours and habitat conditions, **as determined by CDFW through a Lake and Streambed Alteration Agreement**. ~~Impacts to riparian habitat are anticipated only as a result from improvements to the access road.~~ The applicant will prepare a habitat mitigation and monitoring plan (**HMMP**) **for restoration of temporary impact areas (mitigation site)** that includes **the below and the HMMP requirements within the Lake and Streambed Alteration Agreement**:

- Baseline conditions within the mitigation site
- Proposed mitigation site conditions
- Mitigation methods (e.g., habitat creation or enhancement)
- Performance standards/success criteria including a minimum of 70% vegetated cover with native riparian vegetation that are the target of the creation and enhancement efforts and less than 3% invasive species cover
- Habitat maintenance including trash removal, invasive weed removal, and repair of any damage to the mitigation site
- Monitoring requirements including annual monitoring during the establishment period. The annual monitoring will include surveys for native vegetation cover, photo documentation at defined photo-monitoring locations, and monitoring for invasive species and any other habitat stressors. Monitoring will be conducted for the first five years or until success criteria are met.



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### Future Impacts to Fish and Wildlife Resources

CDFW appreciates the inclusion of MM BIO-3, which prevents future development from impacting fish and wildlife resources under the Project's Specific Plan and offers the following revisions to consider Fish and Game Code section 1602 (edits are in ~~strikethrough~~ and **bold**):

#### **MM BIO-3**

Future development under the Specific Plan would be prohibited within any streams, riparian habitats, sensitive natural communities, or other water bodies in the project area. No future development would occur in the floodplain to protect sensitive natural communities and special-status species. **If any changes to the Specific Plan are made and impacts to Fish and Game Code section 1602 resources are anticipated, the Project proponent shall submit a complete Lake and Streambed Alteration notification through EPIMS as noted above.**

A2-7

### Burrowing Owl

CDFW recommends the adoption of MM BIO-4 below to prevent potential impacts to burrowing owl.

#### **MM BIO-4:**

**Prior to initiating Project activities, a qualified biologist shall conduct at least one survey covering the entire Project area and surrounding 15-meter buffer to identify the presence of suitable burrows and/or burrow surrogates (>11 cm in diameter (height and width) and >150 cm in depth) for burrowing owl and sign of burrowing owl (e.g., pellets, prey remains, whitewash, or decoration, etc.). If suitable burrows and/or sign of burrowing owl is found, a breeding season survey for burrowing owl in accordance with the Staff Report on Burrowing Owl Mitigation (Department of Fish and Game, March 2012) shall be conducted by a qualified biologist prior to start of Project activities. If no burrowing owl, active burrowing owl burrows, or sign thereof are found, no further action is necessary. If burrowing owl, active burrowing owl burrows, or sign thereof are found, the qualified biologist shall coordinate with the California Department of Fish and Wildlife (CDFW) to conduct an impact assessment to develop avoidance, minimization, and mitigation measures to be approved by CDFW prior to commencing Project activities and propose mitigation for**

A2-8

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**permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation.**

### **Employee Awareness of Wildlife Resources**

CDFW recommends the adoption of MM BIO-5 below to bring awareness to all persons employed or otherwise working onsite in order to avoid or minimize Project-related impacts to special-status species with potential to occur.

#### **MM BIO-5:**

**A qualified biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site. The education program shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The qualified biologist shall also include as part of the education program information about the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The education program should include, but not be limited to: (1) Best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area; (2) Protected species that have the potential to occur on the Project site including but not limited to burrowing owl; and (3) The location of Spring Canyon Creek and two ephemeral streams that transect the Project site and the importance of ensuring that no refuse or pollution enters the streambed habitat. Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any new workers prior to their performing any work on-site.**

A2-9

### **Owens Valley Vole**

CDFW recommends the adoption of MM BIO-6 below to avoid potential Project-related impacts to Owens Valley vole.

#### **MM BIO-6:**

**A California Department of Fish and Wildlife (CDFW)-approved biologist shall conduct trapping surveys within suitable habitat for Owens Valley vole and within a 150-foot buffer from the Project footprint to identify**

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**presence of Owen’s Valley vole following CDFW-approved trapping protocols prior to initiating all Project activities. If presence of Owens Valley vole is confirmed, the Project proponent shall prepare and implement a set of avoidance and minimization measures to protect Owens Valley vole from Project-related impacts and shall provide them to CDFW for review and approval no fewer than 30 days prior to initiating all Project activities. Additionally, if Owen’s Valley vole is present, a mitigation proposal shall be developed for the loss of habitat. Mitigation shall be determined by CDFW and may include, but is not limited to land acquisition, management and conservation in perpetuity, and funding thereof. Construction shall not proceed until mitigation is complete or a financial security (e.g., letter of credit) for mitigation measures is provided to CDFW.**

### ENVIRONMENTAL DATA

CEQA requires that information developed in Environmental Impact Reports and Negative Declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: [Submitting Data to the CNDDDB \(ca.gov\)](https://www.wildlife.ca.gov/CEQA/submitting-data). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [CNDDDB - Plants and Animals \(ca.gov\)](https://www.wildlife.ca.gov/CEQA/cnddb).

A2-11

### FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

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### CONCLUSION

CDFW requests that the County include in the final MND the suggested mitigation measures (Attachment 1) offered by CDFW to avoid, minimize, and mitigate Project impacts on California fish and wildlife resources.

CDFW appreciates the opportunity to comment on Apogee Farms General Plan Amendment and Cannabis Facility Project (SCH No. 2021050252) and hopes our comments will assist the County in identifying, avoiding, minimizing, and mitigating Project impacts on fish and wildlife resources.

If you should have any questions pertaining to the comments provided in this letter, please contact Corina Jimenez, Environmental Scientist at [Corina.Jimenez@wildlife.ca.gov](mailto:Corina.Jimenez@wildlife.ca.gov).

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### ATTACHMENTS

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

Sincerely,

DocuSigned by:  
 for  
4D759253408941E...  
Alisa Ellsworth  
Environmental Program Manager

ec: Office of Planning and Research, State Clearinghouse, Sacramento  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov).

### REFERENCES

California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available for download at:  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

California Department of Fish and Game (CDFG). 2012. Staff report on burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at:  
<https://www.wildlife.ca.gov/conservation/surveyprotocols>

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State Water Resources Control Board. 2019. Cannabis Cultivation Policy.  
 Available for download at:  
[https://www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/policy/final\\_cannabis\\_policy\\_with\\_attach\\_a.pdf](https://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/policy/final_cannabis_policy_with_attach_a.pdf)

### **ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)**

#### **PURPOSE OF THE MMRP**

The purpose of the MMRP is to ensure compliance with mitigation measures during project implementation. Mitigation measures must be implemented within the time periods indicated in the table below.

A2-14

#### **TABLE OF MITIGATION MEASURES**

The following items are identified for each mitigation measure: Mitigation Measure, Implementation Schedule, and Responsible Party. The Mitigation Measure column summarizes the mitigation requirements. The Implementation Schedule column shows the date or phase when each mitigation measure will be implemented. The Responsible Party column identifies the person or agency that is primarily responsible for implementing the mitigation measure.

A2-15

| <b>Biological (BIO) Mitigation Measures (MM)</b>  | <b>Implementation Schedule</b>         | <b>Responsible Party</b> |
|---|--|--------------------------|
| MM BIO-1:<br><br>A preconstruction survey shall be performed prior to construction. The following measures shall be implemented: <ul style="list-style-type: none"> <li>• Use of heavy equipment, grading, demolition, construction, and/or tree removal, shall avoid the nesting season to the greatest extent feasible.</li> <li>• Regardless of the time of year, a preconstruction survey for active bird nests shall be conducted on the project site and within 500 feet of the project site by a qualified biologist no</li> </ul> | Prior to initiating Project activities | Project Proponent        |

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|  |   |                          |
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| <p>more than three (3) calendar days prior to initiating all Project activities. Surveys shall include any potential habitat, including trees, shrubs, the ground, or nearby structures that might be impacted by activities that may cause nest destruction or abandonment.</p> <p>-If an active nest is detected a 'no-disturbance buffer' in the form of orange mesh Environmentally Sensitive Area (ESA) fencing shall be established around occupied nests to prevent destruction of the nest and to prevent disruption of breeding or rearing behavior. The extent of the 'no-disturbance buffer' shall be no less than 300 feet (500 feet for raptors), a smaller buffer may be determined by a qualified biologist. 'No-disturbance buffers' shall be maintained until the end of the breeding season or until a qualified wildlife biologist has determined that the nestlings have fledged. A qualified wildlife biologist shall inspect the active nest to determine whether construction activities are disturbing to the nesting birds or nestlings. If the qualified wildlife biologist determines that construction activities pose a disturbance to nesting, construction work shall be stopped in the area of the nest, and the 'no-disturbance buffer' expanded.</p> |   |                          |
| <p>MM BIO-2:<br/><br/>                 If construction activities impact riparian habitat and/or Fish and Game Code section 1602 resources, the permanent loss of riparian habitat and/or Fish and Game Code section 1602 resources shall be compensated as determined by the</p>  | <p>Prior to initiating Project activities</p> | <p>Project Proponent</p> |

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|   |  |  |
|---|--|--|
| <p>California Department of Fish and Wildlife (CDFW) through a Lake and Streambed Alteration Agreement through one or more of the following: on-site restoration; purchase of mitigation bank credits from a CDFW-approved mitigation bank; and/or land acquisition, management and conservation in perpetuity, and funding thereof. Permanent impacts to riparian habitat shall be compensated at a minimum 2:1 ratio (acres mitigated: acres impacted) or as determined by CDFW during project analysis after receiving notification for a Lake and Streambed Alteration Agreement. All areas of temporary impact will be restored to preconstruction contours and habitat conditions, as determined by CDFW through a Lake and Streambed Alteration Agreement. The applicant will prepare a habitat mitigation and monitoring plan (HMMP) for restoration of temporary impact areas (mitigation site) that includes the below and the HMMP requirements within the Lake and Streambed Alteration Agreement:</p> <ul style="list-style-type: none"> <li>• Baseline conditions within the mitigation site</li> <li>• Proposed mitigation site conditions</li> <li>• Mitigation methods (e.g., habitat creation or enhancement)</li> <li>• Performance standards/success criteria including a minimum of 70% vegetated cover with native riparian vegetation that are the target of the creation and enhancement efforts and less than 3% invasive species cover</li> <li>• Habitat maintenance including trash removal, invasive weed removal, and repair of any damage to the mitigation site</li> <li>• Monitoring requirements including annual monitoring during the establishment period. The annual monitoring will include surveys for</li> </ul> |  |  |
|---|--|--|

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|   |   |                          |   |
|---|---|--------------------------|---|
| <p>native vegetation cover, photo documentation at defined photo-monitoring locations, and monitoring for invasive species and any other habitat stressors. Monitoring will be conducted for the first five years or until success criteria are met.</p>  |   |                          |   |
| <p>MM BIO-3:<br/>                 Future development under the Specific Plan would be prohibited within any streams, riparian habitats, sensitive natural communities, or other water bodies in the project area. No future development would occur in the floodplain to protect sensitive natural communities and special-status species. If any changes to the Specific Plan are made and impacts to Fish and Game Code section 1602 resources are anticipated, the Project proponent shall submit a complete Lake and Streambed Alteration notification through EPIMS as noted above.</p>  | <p>Prior to initiating Project activities</p> | <p>Project Proponent</p> | <div style="border: 1px solid black; padding: 2px;">A2-18</div> |
| <p>MM BIO-4<br/>                 Prior to initiating Project activities, a qualified biologist shall conduct at least one survey covering the entire Project area and surrounding 15-meter buffer to identify the presence of suitable burrows and/or burrow surrogates (&gt;11 cm in diameter (height and width) and &gt;150 cm in depth) for burrowing owl and sign of burrowing owl (e.g., pellets, prey remains, whitewash, or decoration, etc.). If suitable burrows and/or sign of burrowing owl is found, a breeding season survey for burrowing owl in accordance with the Staff Report on Burrowing Owl Mitigation (Department of Fish and Game, March 2012) shall be conducted by a qualified biologist prior to start of Project activities. If no burrowing owl, active burrowing owl</p> | <p>Prior to initiating Project activities</p> | <p>Project Proponent</p> | <div style="border: 1px solid black; padding: 2px;">A2-19</div> |



## APPENDIX E - RESPONSES TO COMMENTS

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|  |   |                          |
|--|---|--------------------------|
| <p>burrows, or sign thereof are found, no further action is necessary. If burrowing owl, active burrowing owl burrows, or sign thereof are found, the qualified biologist shall coordinate with the California Department of Fish and Wildlife (CDFW) to conduct an impact assessment to develop avoidance, minimization, and mitigation measures to be approved by CDFW prior to commencing Project activities and propose mitigation for permanent loss of occupied burrow(s) and habitat consistent with the 2012 Staff Report on Burrowing Owl Mitigation.</p>   |   |                          |
| <p>MM BIO-5</p> <p>A qualified biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site. The education program shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The qualified biologist shall also include as part of the education program information about the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The education program should include, but not be limited to: (1) Best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area; (2) Protected species that have the potential to occur on the Project site including but not limited to burrowing owl; and (3) The location of Spring Canyon Creek and two ephemeral streams that transect the Project site and the importance of ensuring that no refuse or pollution enters the streambed habitat. Interpretation shall be provided for any non-</p> | <p>Prior to initiating Project activities</p> | <p>Project Proponent</p> |

A2-20

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|   |   |                          |
|---|---|--------------------------|
| <p>English speaking workers, and the same instruction shall be provided for any new workers prior to their performing any work on-site.</p>   |   |                          |
| <p>MM BIO-6</p> <p>A California Department of Fish and Wildlife (CDFW)-approved biologist shall conduct trapping surveys within suitable habitat for Owens Valley vole and within a 150-foot buffer from the Project footprint to identify presence of Owen’s Valley vole following CDFW-approved trapping protocols prior to initiating all Project activities. If presence of Owens Valley vole is confirmed, the Project proponent shall prepare and implement a set of avoidance and minimization measures to protect Owens Valley vole from Project-related impacts and shall provide them to CDFW for review and approval no fewer than 30 days prior to initiating all Project activities. Additionally, if Owen’s Valley vole is present, a mitigation proposal shall be developed for the loss of habitat. Mitigation shall be determined by CDFW and may include, but is not limited to land acquisition, management and conservation in perpetuity, and funding thereof. Construction shall not proceed until mitigation is complete or a financial security (e.g., letter of credit) for mitigation measures is provided to CDFW.</p> | <p>Prior to initiating Project activities</p> | <p>Project Proponent</p> |

A2-21

## APPENDIX E - RESPONSES TO COMMENTS

### Response to Comment A2-1

The comment states that the results and methods of the reconnaissance level survey were not provided in the IS/MND and focused surveys should have been conducted for burrowing owl and Owens Valley vole.

The methods for the reconnaissance survey and survey dates are described under Field Surveys on page 3-14 of the IS/MND. The results of the reconnaissance survey are provided in the Natural Communities descriptions on Pages 3-14 and 3-16 and Figure 3.4-1 of the IS/MND and in the description of Wetlands and Other Water Bodies on page 3-17.

A search of the California Natural Diversity Database (CNDDDB) was conducted to identify known occurrences of burrowing owl. No burrowing owl have been recorded within 20 miles of the project. The nearest occurrence of burrowing owl is in Inyo County at a much lower elevation than the project site. Therefore, burrowing owl are not expected to occur on the site. As described in Table 3-3, habitat for Owens Valley vole does not occur on the site. The habitat on site consists of sagebrush scrub and greasewood scrub and does not include meadow or wetland vegetation.

### Response to Comment A2-2

The comment notes that California Department of Fish and Wildlife (CDFW) offers minor revisions to BIO-2 and BIO-3. The comment is noted.

### Response to Comment A2-3

The comment suggests that the IS/MND does not include a proper analysis of groundwater impacts and that the project applicant coordinate with the Owens Valley Groundwater Authority to develop best management practices. It also suggests that cannabis cultivation requires large quantities of water and will impact fish slough.

The IS/MND discusses groundwater supply and ~~utilizes information from the OVGAS's GSP~~ ~~the OVGA's plans to develop a GSP~~ in Section 3.11(b). The groundwater supply is also addressed in Section 3.20(b). Any existing impacts on fish slough as a result of existing water use in the basin is the existing condition and not an impact from the project. Given that the ~~project cannabis cultivation~~ would use less water than a single residence and the proposed project water use represents 0.0005 percent of the existing groundwater use in the basin, the ~~project cannabis cultivation~~ would not impede sustainable groundwater management.

### Response to Comment A2-4

The comment recommends a jurisdictional delineation, revisions to MM BIO-1, BIO-2, and BIO-3 and adoption of additional mitigation measures. A jurisdictional delineation was not conducted because no wetland vegetation communities occur on the site. Spring Creek, an ephemeral creek, is the only potentially jurisdictional resource on the site and the potential impacts on that resource are defined in the IS/MND. CDFW has separate jurisdiction under Section 1600 of Fish and Game Code. Responses to CDFW comments on the mitigation measures are provided below.

## APPENDIX E - RESPONSES TO COMMENTS

### Response to Comment A2-5

CDFW's suggested text edits to MM BIO-1 are provided in the comment. CDFW's comment about striking the nesting season and striking CDFW approval for the biologist were not accepted. It is standard practice to conduct nesting bird surveys during the nesting season rather than during the winter (when there is snow on the ground in this region). The County is the lead CEQA agency and has the ability to require approval of the biologist. Other edits were accepted as shown below.

### Mitigation Measure BIO-1: Nesting Bird Surveys

A preconstruction survey shall be performed prior to construction. The following measures shall be implemented:

- Use of heavy equipment, grading, demolition, construction, and/or tree removal, shall avoid the nesting season to the greatest extent feasible.
- If use of heavy equipment, grading, demolition, construction, and/or tree removal are scheduled to occur during the nonbreeding season (September 1 through February 15), no measures are required.
- If construction activities occur during the nesting season, a pre-construction survey for active bird nests in the project site shall be conducted on the project site and within 500 feet of the project site by a qualified biologist approved by the County
  - If no nesting or breeding behavior is observed, construction may proceed.
  - If an active nest is detected, ~~a determination shall be made by a qualified biologist as to whether construction work could affect the active nest. If it is determined that construction would not affect an active nest, work may proceed. If it is determined that construction activities are likely to impair the successful rearing of the young,~~ a 'no-disturbance buffer' in the form of orange mesh Environmentally Sensitive Area (ESA) fencing shall be established around occupied nests to prevent destruction of the nest and to prevent disruption of breeding or rearing behavior. The extent of the 'no-disturbance buffer' shall be no less than 300 feet (500 feet for raptors), a smaller buffer may be determined by a qualified biologist ~~in consultation with CDFW.~~ 'No-disturbance buffers' shall be maintained until the end of the breeding season or until a qualified wildlife biologist has determined that the nestlings have fledged. A qualified wildlife biologist shall inspect the active nest to determine whether construction activities are disturbing to the nesting birds or nestlings. If the qualified wildlife biologist determines that construction activities pose a disturbance to nesting, construction work shall be stopped in the area of the nest, and the 'no-disturbance buffer' expanded.

## APPENDIX E - RESPONSES TO COMMENTS

### Response to Comment A2-6

It is noted that DCC requires cannabis cultivators to demonstrate compliance with Section 1602 of Fish and Game Code. BIO-2 was specifically prepared to address project impacts on Spring Creek from widening of the access road. No other impacts on streams would occur with implementation of MM BIO-3. The County has accepted some of CDFW's comments on MM BIO-2 (renumbered as MM BIO-3). In order to comply with CEQA, the County cannot defer mitigation until a later permit process. MM BIO-2 specifies a minimum level of mitigation that would be provided to address impacts under CEQA. CDFW could require other mitigation or conditions in the 1602 permit.

#### **Mitigation Measure BIO-3: Mitigation for Riparian Habitat and/or Fish and Game Code Section 1602 Resources.**

If construction activities impact riparian habitat and/or Fish and Game Code Section 1602 resources, the permanent loss of riparian habitat and/or Fish and Game Code Section 1602 resources shall be compensated through either on-site restoration, purchase of mitigation bank credits from a CDFW approved mitigation bank, and/or land acquisition, management and conservation in perpetuity and funding thereof. enhancement or establishment of riparian habitat. Permanent impacts to riparian habitat shall be compensated at a ratio commensurate with the quality of habitat impacted and habitat created and the type of mitigation provided.~~through enhancement of riparian areas at a minimum 2:1 ratio (enhancement:impact) or creation of riparian areas at a minimum 1:1 ratio.~~ All areas of temporary impact will be restored to preconstruction contours and habitat conditions. The applicant will prepare a habitat mitigation plan that includes:

- Baseline conditions within the mitigation site
- Proposed mitigation site conditions
- Mitigation methods (e.g., habitat creation or enhancement)
- Performance standards/success criteria including a minimum of 70% vegetated cover with native riparian vegetation that are the target of the creation and enhancement efforts and less than 3% invasive species cover
- Habitat maintenance including trash removal, invasive weed removal, and repair of any damage to the mitigation site
- Monitoring requirements including annual monitoring during the establishment period. The annual monitoring will include surveys for native vegetation cover, photo documentation at defined photo-monitoring locations, and monitoring for invasive species and any other habitat stressors. Monitoring will be conducted for the first five years or until success criteria are met.

## APPENDIX E - RESPONSES TO COMMENTS

### **Response to Comment A2-7**

CDFW provided comments to MM BIO-3 (renumbered as MM BIO-2) to address future changes to the Specific Plan.

Should future changes to the Specific Plan be required, the County would review those changes in compliance with CEQA and would develop additional mitigation if needed. The mitigation addresses the impacts of the proposed project including the Specific Plan as defined.

### **Response to Comment A2-8**

The comment recommends a mitigation measure to address burrowing owl. As noted in response to comment A2-1, no burrowing owl have been documented within 20 miles. Burrowing owl are not expected to occur due to the habitat conditions on site, high elevation of the site and lack of burrowing owl nearby. Therefore, mitigation for burrowing owl is not required.

### **Response to Comment A2-9**

The comment requests that the County add a mitigation measure for an employee awareness program. As discussed in the IS/MND, the project site does not contain rare plants and the only endangered species that have suitable habitat in the area is loggerhead shrike, a nesting bird. Given that a biologist will conduct pre-construction surveys for nesting birds in MM BIO-1 a significant impact would not occur due to worker behavior. The mitigation is therefore not needed.

### **Response to Comment A2-10**

The comment requests that the County add a mitigation measure for Owen's Valley vole. As discussed in response to comment A2-1, there is no suitable habitat for Owen's Valley vole on the project site. Therefore, there is no need for mitigation for Owen's valley vole as Owen's Valley vole would not occur on the site.

### **Response to Comment A2-11**

The requirements for submitting special-status species data to CNDDDB are noted.

### **Response to Comment A2-12**

CDFW required filing fees for the Notice of Determination are noted.

### **Response to Comment A2-13**

The CDFW's specific comments on the MMRP and mitigation measures are addressed in responses to comments above and below.

### **Response to Comment A2-14**

The purpose of the mitigation monitoring and reporting program (MMRP) are noted.

### **Response to Comment A2-15**

The comment identifies the columns included in the MMRP table.

## APPENDIX E - RESPONSES TO COMMENTS

### **Response to Comment A2-16**

The MMRP incorporates the edits to MM BIO-1 provided in response to comment A2-5.

### **Response to Comment A2-17**

The MMRP incorporates the edits to MM BIO-2 (now MM BIO-3) as noted in response to comment A2-6.

### **Response to Comment A2-18**

No changes are made to MM BIO-3 (now MM BIO-2) as discussed in response to comment A2-7.

### **Response to Comment A2-19**

MM BIO-4 is not added to the IS/MND and MMRP as discussed in response to comment A2-8.

### **Response to Comment A2-20**

MM BIO-5 is not added to the IS/MND and MMRP as discussed in response to comment A2-9.

### **Response to Comment A2-21**

MM BIO-6 is not added to the IS/MND and MMRP as discussed in response to comment A2-10.

## APPENDIX E - RESPONSES TO COMMENTS

### Letter 3: Sherri Lisius, Bureau of Land Management

Letter A3

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**From:** Lisius, Sherri K <slisius@blm.gov>  
**Sent:** Monday, August 1, 2022 2:03 PM  
**To:** Wendy Sugimura; Michael Draper  
**Cc:** Starosta, Jeffrey A  
**Subject:** Apogee Farm

Hello Wendy and Michael,

We have a few thoughts on this proposal.

Because the marijuana is still federally illegal, there can't be any transport of the drug on BLM lands. It seems like it isn't needed but that is just a heads up.

A3-1

Also, they will need to be very careful with land status and should probably have a survey done if there is any question about the land status due to this same issue.

A3-2

What kind of water needs are there? Would there be a new or deeper well? If there is a lot of water pumping associated, there may be concerns about impacts to endangered fish and plants in fish slough.

A3-3

Thanks!

Sherri Lisius  
Assistant Field Manager  
Bureau of Land Management, California  
DOI, Region 10  
Bishop, CA  
760-872-5022 (Office)



## APPENDIX E - RESPONSES TO COMMENTS

### **Response to Comment A3-1**

The project will connect to County roads. No transport on BLM lands is proposed.

### **Response to Comment A3-2**

The project is located on private land subject to County jurisdiction. No federal land would be affected.

### **Response to Comment A3-3**

The project water demand is described on Page 2-12 of the IS/MND. Sections 3.11(b) and 3.20(b) discuss project impact on groundwater supplies. See also response to comment A2-3.



**RESOLUTION R22-10**

**A RESOLUTION OF THE MONO COUNTY PLANNING COMMISSION RECOMMENDING CERTIFICATION OF A MITIGATED NEGATIVE DECLARATION, INCLUDING ADOPTION OF THE MITIGATION MONITORING AND REPORTING PROGRAM, AND ADOPTION OF GENERAL PLAN AMENDMENT 22-10 CHANGING THE LAND USE DESIGNATION FROM RURAL RESIDENTIAL-40 TO SPECIFIC PLAN AND THE APOGEE FARM SPECIFIC PLAN, AND MAKING USE PERMIT FINDINGS TO ALLOW CANNABIS OPERATIONS AND OVERHEAD UTILITY LINES**

**WHEREAS**, General Plan Amendment 18-01, approved by the Mono County Board of Supervisors allows commercial cannabis operations within the jurisdiction of Mono County, consistent with General Plan Chapter 13, *Commercial Cannabis Actives*, and County Code Chapter 5.60, *Cannabis Operations*; and

**WHEREAS**, commercial cannabis actives are prohibited in residential land use designations; and

**WHEREAS**, a property owner may initiate a change of the land use designation of parcels under their ownership; and

**WHEREAS**, the property owner of Accessor's Parcel Number 025-020-013 and 025-040-002 requested to change the parcel's designation from Rural Residential-40 to Specific Plan, for the purpose of creating a commercial cannabis operation that will include the cultivation, processing, and distribution of cannabis; and

**WHEREAS**, in May 2021, a Notice of Preparation (NOP) was distributed and a meeting was held to discuss the scope of the environmental analysis for the Apogee Farm project which, as proposed, consisted of a General Plan Amendment for a land use designation change from Rural Residential-40 to Agriculture-40 and a Conditional Use Permit for commercial cannabis activities; and

**WHEREAS**, due to scoping and discovery, the project was modified to its current iteration, which modified the project to a designation change from Rural Residential-40 to Specific Plan and the preparation of the associated Apogee Farm Specific Plan, which includes the Conditional Use Permit; and

**WHEREAS**, a Specific Plan has been prepared consistent with Government Code section 65451 and the Mono County General Plan establishing development standards, and includes the equivalent of a use permit to allow for commercial cannabis activities; and

**WHEREAS**, in compliance with the California Environmental Quality Act (CEQA) an initial environmental study was conducted to assess environmental factors potentially affected by the project including aesthetics, biological resources, tribal cultural resources, cultural resources, and air quality, and mandatory findings of significance; and

**WHEREAS**, the initial study concluded that potential environmental impacts would be mitigated to a level of less than significant by incorporating mitigation measures into the Apogee Farm Specific Plan; and

1           **WHEREAS**, AB 52 Tribal consultation noticing was sent on June 12, 2020, and March 2, 2022,  
2 and a Notice of Preparation was published on May 15, 2021; and

3           **WHEREAS**, a Mitigated Negative Declaration report (MND) was prepared in compliance with  
4 CEQA and released for a 30-day public comment period ending August 15, 2022; and

5           **WHEREAS**, a total of three comment letters were received during the comment period, which  
6 have been addressed in a response to comments section and adjustments to the specific plan and MND; and

7           **WHEREAS**, none of the project changes require recirculation of the MND under CEQA  
8 §15088.5(a); and

9           **WHEREAS**, on October 3, 2022, the Planning Commission held a duly noticed public hearing  
10 regarding Apogee Farm General Plan Amendment, Specific Plan, and Final MND; and

11           **NOW, THEREFORE, THE MONO COUNTY PLANNING COMMISSION DOES HEREBY  
12 RESOLVE AS FOLLOWS:**

13           **SECTION ONE:** Having reviewed and considered the analysis in the staff report, comments  
14 received during the public review process and testimony provided in the public hearing, the Planning  
15 Commission recommends that the Board of Supervisors certify the Mitigated Negative Declaration and  
16 adopt the Mitigation Monitoring Program which are hereby incorporated by reference, and finding that, on  
17 the basis of the whole record, including the initial study and comments received, there is no substantial  
18 evidence that the project will have a significant effect on the environment and that the MND reflects the lead  
19 agency’s independent judgement and analysis.

20           **SECTION TWO:** Having reviewed and considered all information and evidence presented,  
21 including public testimony, written comments, the Mitigated Negative Declaration and staff report and  
22 presentations, the Planning Commission recommends that the Board of Supervisors approve the General  
23 Plan Amendment 22-\_\_ changing the current land use designation of RR-40 to Specific Plan, finding that:

24           A. *The proposed changes in land use designation are consistent with the text and maps of the General  
25 Plan because:*

26           The proposed land use designation, Specific Plan, is consistent with the text and maps of the  
27 General Plan upon approval of the General Plan Amendment. The Specific Plan designation may  
28 be applied to any property, outside existing communities, to provide for planned development.  
29 The Specific Plan establishes development standards and permissible uses. For this project, the  
30 development standards and permissible uses are listed in the Apogee Farm Specific Plan, Chapter  
IV. Land Use Designation Regulatory Provisions.

          The proposed changes to the land use designation are consistent with General Plan Land Use (LU)  
Element policies directing the County to utilize the specific plan process for large-scale projects and  
to mitigate impacts resulting from commercial cannabis activity. (LU Element Objective 1.L,  
Policies 1.L.1., 1.L.3, and 1.L.4).

          The designation change is reasonable within the context of providing compatible land uses within  
the Tri-Valley and does not alter the adopted policies for the Tri-Valley in a manner inconsistent  
with the text or maps of the General Plan.

1 B. *The proposed change in land use designation is consistent with the goals and policies contained*  
2 *within any applicable area plan because:*

3 The proposed change in land use designation is consistent with the goals and policies for the Tri-  
4 Valley Area Plan, including the following Issues/Opportunities and Constraints and Tri-Valley  
5 Policies.

6 Issues/Opportunities and Constraints

7 “2. There is a desire to maintain and enhance agricultural uses in the Tri-Valley.”

8 The Specific Plan written for this project will maintain consistency with the existing density allowed  
9 for the parcels. The proposed use of the property, cannabis cultivation, is similar to agricultural use.

10 “3. The Tri-Valley area is experiencing increasing pressure for residential development. Residents  
11 in the TriValley are concerned about that pressure and would like to retain the current rural-  
residential character of the area.”

12 The designation change for the property will retain the rural-residential character of the area. The  
13 Specific Plan allows for an agricultural use with limited residential capacity. The commercial  
14 operation will be operated by the property owner living on site and may employ two additional  
employees. The project will not induce population growth in the area.

15 “4. Parts of the Tri-Valley area are subject to flooding.”

16 A portion of the property is subject to flooding. A mitigation measure for this project prohibits future  
17 development within any stream, riparian habitat, sensitive natural communities, or other water  
18 bodies in the project area. No future development would occur in the floodplain (MMRP BIO-3).

19 Tri-Valley Policies

20 “Action 26.A.1.c. Require new development to provide adequate buffering of incompatible uses  
21 (e.g., landscaping, physical barriers, large setbacks) to protect agricultural areas from residential and  
22 other incompatible land uses.”

23 The new cannabis operation will be located on the northern parcel leaving the southern parcel as a  
24 buffer between the operation and nearest residential parcel to the south (22889 Hwy 6). The adjacent  
25 property to the west is designated Industrial and contains a single residential unit along with vehicles  
26 and trailers in various states of disrepair. The cannabis operation will be setback over 300’ from the  
shared property line.

27 C. *The site of proposed change in land use designation is suitable for any of the land uses permitted*  
28 *within the proposed specific plan because:*

29 The site of the proposed change in land use designation is suitable for uses permitted within the  
30 Specific Plan. The use is similar to the adjacent agricultural use and less intense than the adjacent  
industrial use. The project site contains an approved well, but no other uses, and is large enough to  
provide a significant portion of needed infrastructure improvements, including roads meeting fire  
safe standards (LU Element Chapter 22 and 14 California Code of Regulations§1273.00, et.seq.),

1 an onsite wastewater treatment system, and water supply from the well, among other infrastructure.  
2 The proposed uses limit water consumption over traditional agricultural crops, therefore it is a  
3 suitable land use designation change. It is suitable for the proposed commercial cannabis use, which  
4 will provide employment and economic opportunity for the applicant. Residential units will be tied  
5 to the commercial components; the applicant will live on site and may provide housing for labor.

6  
7  
8  
9  
10  
11 D. *The proposed change in land use designation is reasonable and beneficial at this time because:*

12  
13 The land use designation change will allow the applicant to conduct a commercial cannabis  
14 cultivation operation while maintaining the residential density allowed at the property and avoiding  
15 sensitive habitat. The change of the land use designation is appropriate for conducting a commercial  
16 cannabis operation, as commercial cannabis operations are prohibited in residential designations.  
17 Commercial cannabis is a new industry, approved by the majority of residents in Mono County,  
18 evident by the 2016 statewide election result of Proposition 64, the Adult Use of Marijuana Act,  
19 and affirmed by the Mono County Board of Supervisors in 2017 in approving Resolution R17-88,  
20 initiating and adopting General Plan Amendment (GPA) 17-03/Cannabis, establishing policies  
21 governing commercial cannabis activity.

22  
23 E. *The proposed change in land use designation will not have a substantial adverse effect on*  
24 *surrounding properties because:*

25  
26 As described in the MND for the project and associated Mitigation Monitoring and Reporting Plan,  
27 impacts to surrounding properties have been reduced to less than significant levels. including  
28 impacts to aesthetics, biological resources, tribal cultural resources, cultural resources, and air  
29 quality. Properties surrounding the project site are sparsely populated, or vacant, or used for  
30 agriculture or storage.

Potential direct adverse effects to specific surrounding properties include aesthetics, mitigated by  
requiring compliance with General Plan Chapter 23, Dark Sky Regulations, and air quality,  
mitigated with odor control measures.

**SECTION THREE:** The Planning Commission recommends that the Board of Supervisors adopt  
the Apogee Farm Specific Plan, finding in accordance with the California Government Code section 65454,  
that the specific plan is consistent with the Mono County General Plan.

**SECTION FOUR:** Having reviewed and considered all information and evidence presented,  
including public testimony, written comments, Mitigated Negative Declaration and staff report and  
presentations, the Planning Commission recommends the Board approve the equivalent of a Use Permit for  
commercial cannabis activities as part of the Specific Plan, including Conditions of Approval, finding that:

A. *All applicable provisions of the Land Use Designations and Land Development Regulations are  
complied with, and the site of the proposed use is adequate in size and shape to accommodate the  
use and to accommodate all yards, walls and fences, parking, loading, landscaping and other  
required features.*

The Apogee Farm Specific Plan designates the land use of the property and is intended to  
accommodate the commercial cannabis activity. The property is adequate in size and shape to

1 accommodate the cannabis activity, meeting all development standards and minimizing potential  
2 impacts on adjacent neighbors. The cannabis activity will be setback a minimum of 50' from all  
3 property lines. Access is required to be improved to meet MCGP Chapter 22, Fire Safe  
4 Regulations, and sufficient parking shall be provided on site for employees and the property  
5 owner.

6 *B. The site for the proposed use relates to streets and highways adequate in width and type to carry  
7 the quantity and kind of traffic generated by the proposed use.*

8 The site is able to carry the quantity and kind of traffic generated by the use. The property will not  
9 be open to the public. Vehicle trips will include employees (two) traveling to and from the site,  
10 product distribution vehicles, and the property owner. The project is required to comply with  
11 requirements of Caltrans District 9, for encroaching U.S. Route 6. Traffic generated by the project  
12 will not impact the existing transportation corridor.

13 *C. The proposed use will not be detrimental to the public welfare or injurious to property or  
14 improvements in the area in which the property is located.*

15 The proposed use has been mitigated to minimize impacts to the public, as described in the  
16 Mitigation Monitoring and Reporting Plan (see Attachment C). The cannabis activity will take  
17 place on the northern parcel. The southern parcel will not be developed and will provide a 1,000'  
18 buffer between the project site and the nearest neighbor (22889 U.S. Route 6). Odor control  
19 measures have also been identified for greenhouses where cultivation takes place. The applicant  
20 will install a Cannabuster odor elimination system or equivalent. If odors are determined to be a  
21 nuisance, the County may require modifications to the system.

22 *D. The proposed use is consistent with the map and text of this General Plan and any applicable area  
23 plan.*

24 The proposed use is consistent with the General Plan and area plans. The Tri-valley is intended to  
25 provide for agricultural operations, similar to the project. The project meets General Plan  
26 standards and regulations for cannabis activities, as defined in Chapter 13, Commercial Cannabis  
27 Activities.” Compliance with Mono County Code Chapter 5.60, Commercial Cannabis  
28 Operations, and all County Code and General Plan regulations shall be met.

29 **SECTION FIVE:** Having reviewed and considered all information and evidence presented, including  
30 public testimony, written comments, Mitigated Negative Declaration and staff report and presentations, the  
Planning Commission recommends the Board of Supervisors approve commercial overhead power as part of  
the Apogee Farm Specific Plan, finding that:

*In granting a permit for overhead utility lines, the Community Development director (Director) or the  
Planning Commission (Commission) shall make at least one of the following findings in addition to  
the required Director Review or Use Permit findings, and shall also require anticipated impacts from  
all the findings be avoided, minimized, or mitigated to the extent possible:*

1. *The overhead line placement will not significantly disrupt the visual character of the area. In making  
this determination, the Director or the Commission shall consider the following:*

1 a. *In areas without a number of existing overhead lines in the immediate vicinity, would overhead*  
2 *lines create the potential for a significant cumulative visual impact; i.e., would allowing an*  
3 *overhead line be likely to result in future requests for additional overhead lines in the area? If so,*  
4 *it may be determined that an overhead line will have a significant impact on the visual character*  
5 *of the area.*

6 Overhead lines are located on the western side of the US 6 in this area; therefore, the new line  
7 would not need to cross the highway. Approximately 1,100' south of this photo, the adjacent  
8 parcel, developed in 1994, contains overhead power.

9 b. *Does the topography or vegetation in the area effectively screen the proposed lines? If so, then an*  
10 *additional line may not significantly disrupt the visual character of the area.*

11 The topography or vegetation do not screen the proposed line. The topography slopes down from  
12 the site, towards Route 6, and therefore the lines will trend upwards at a very low angle. The  
13 vegetation consists of short shrubs and there are no trees in the area.

14 c. *Are there other potential alignments that would have less visual impact?*

15 No.

16 d. *Does the project reduce the overall number of overhead lines and poles in the area; are the lines*  
17 *co-located with existing facilities; and/or do design features such as height of lines, size, color,*  
18 *reflectivity, tension in line, or other features reduce visual impacts? If so, it may be determined*  
19 *that an overhead line will not have a significant impact on the visual character of the area. The*  
20 *Director or the Commission may consider additional information pertaining to the visual*  
21 *character of the area that is deemed relevant to the application.*

22 One parcel west of the project site is privately owned and could develop the need for electrical  
23 lines. All other parcels to the west of the project are owned by the Bureau of Land Management.  
24 Overhead power lines for this project do not reduce the number of lines in the area and has no  
25 design features reducing visual impacts.

26 2. *The placement of utility lines above ground is environmentally preferable to underground placement*  
27 *and does not create public health and safety impacts. In making this determination, the Director or*  
28 *the Commission shall consider the following:*

29 a. *Will underground placement disturb an environmentally sensitive area, including but not limited*  
30 *to the following: cultural resource sites, significant wildlife habitat or use areas, riparian or*  
*wetland areas, or shallow groundwater? If so, above-ground placement may be preferable;*

Undergrounding the utility line will require trenching under Spring Canyon Creek and the  
surrounding floodplain. The floodplain encompasses Rubber Rabbit Brush Scrub Shrubland  
Alliance vegetative communities which occurs as the grade tapers off near the bottom of the  
valley, portions of which historically were flooded. This area still accumulates moisture and  
supports more facultative species. Above-ground placement is preferred.

b. *Will overhead placement cause impacts to sensitive species, such as the Bi-State Distinct*  
*Population Segment of Greater Sage-Grouse, or other environmental impacts? If so, aboveground*

1 *placement may not be preferable, or perch deterrents and other mitigations may be required (see*  
2 *policies in the Conservation/Open Space Element);*

3 Greater Sage-Grouse species have not been determined to breed, nest, or populate this region of  
4 the County.

- 5 c. *Will underground placement require disturbance of a waterway, including perennial, intermittent*  
6 *and seasonal streams? If so, above-ground placement may be preferable;*

7 Yes, undergrounding utility lines will disturb Spring Canyon Creek, and an ephemeral drainage a  
8 long this portion of US 6. Above-ground placement is preferred.

- 9 d. *Will underground placement increase the utility line's exposure to environmental hazards, such*  
10 *as flood hazards, fault hazards or liquefaction? If so, above-ground placement may be preferable;*

11 Yes, the utility lines would be undergrounded through Spring Canyon Creek, exposing them to  
12 flood hazards. Above-ground placement is preferred.

- 13 e. *Are there other potential alignments that would avoid potential environmental impacts?; and*

14 An above-ground alignment would avoid environmental impacts. The desired alignment will  
15 follow pre-disturbed land to minimize impacts.

- 16 f. *Are there adequate provisions for long-term maintenance and fire-hazard mitigation? If so,*  
17 *above-ground placement may be acceptable. The Director or the Commission may consider*  
18 *additional information pertaining to the environmental sensitivity of the area that is deemed*  
19 *relevant to the application.*

20 Overhead power poles would be located on the applicant's property and shall be maintained by  
21 the property owner to prevent wildfire. The utility company will provide additional vegetation  
22 maintenance around the poles every three to five years. Poles would be located between the  
23 applicant's development and U.S. 6 which can be visually monitored for fire-hazards.

- 24 3. *The installation of underground utilities would create an unreasonable financial hardship on the*  
25 *applicant due to the unique physical characteristics of the property. In making this determination, the*  
26 *Director or the Commission shall consider the following:*

- 27 a. *Is the cost of the line to be installed excessive?*

28 The applicant met on-site with Tim Rafferty, Southern California Edison staff, to gain an estimate  
29 on the project. SCE estimated a cost of \$20,000 to complete the overhead electrical drop and  
30 undergrounding to the property line. Undergrounding from the property line to the structures is  
estimated to cost an additional \$20,000, for a total of \$40,000.

- b. *Will the installation of underground utilities require trenching under a stream bed?*

Yes.



1 c. Will the installation of underground utilities require unreasonable trenching or blasting through  
2 rock?

3 No.

4 d. Are there alternate alignments that would eliminate or significantly lessen the financial hardship?  
5 The Director or the Commission may consider other site specific financial hardships deemed  
6 relevant to the application.

7 No.

8 4. The exclusive purpose of the overhead line is to serve an agricultural operation. For the purposes of  
9 this section, agricultural operations are defined as use of the land for the production of food and fiber,  
10 including the growing of crops and grazing of livestock. Above-ground utility lines may be permitted  
11 for agricultural uses such as pumps and similar uses.

12 a. Impacts to sensitive species, such as the Bi-State Distinct Population Segment of Greater Sage  
13 Grouse shall be avoided, minimized, or mitigated consistent with policies in the Conservation/Open  
14 Space Element.

15 The project is not located in an area identified as Sage Grouse habitat. The exclusive purpose of  
16 the overhead line is to serve an agricultural operation and associated residential uses. This finding  
17 can be made.


18 **PASSED AND ADOPTED** this 3<sup>rd</sup> day of October, 2022, by the following vote of the Planning  
19 Commission:

20 AYES : Lizza, Fogg, Bush, Lagomarsini

21 NOES :


22 ABSENT :

23 ABSTAIN :

24   
25 \_\_\_\_\_  
26 Roberta Lagomarsini, Vice Chair

27 ATTEST:

28 APPROVED AS TO FORM:

29   
30 \_\_\_\_\_  
31 Heidi Willson  
32 Secretary of the Planning Commission

33   
34 \_\_\_\_\_  
35 County Counsel



R24-\_\_ AND ORD 24-\_\_

**A RESOLUTION AND ORDINANCE OF THE MONO COUNTY BOARD OF SUPERVISORS CERTIFYING THE MITIGATED NEGATIVE DECLARATION, INCLUDING ADOPTION OF THE MITIGATION MONITORING AND REPORTING PROGRAM, AND ADOPTING GENERAL PLAN AMENDMENT (GPA) 24-01, CHANGING THE LAND USE DESIGNATION OF TWO PARCELS FROM RURAL RESIDENTIAL-40 TO SPECIFIC PLAN, AND ADOPTING THE APOGEE FARM SPECIFIC PLAN AND MAKING USE PERMIT FINDINGS TO ALLOW FOR COMMERCIAL CANNABIS ACTIVITIES AND OVERHEAD UTILITY LINES**

**WHEREAS**, General Plan Amendment (GPA) 18-01, approved by the Mono County Board of Supervisors allows commercial cannabis operations within the jurisdiction of Mono County, consistent with General Plan Chapter 13, *Commercial Cannabis Activities*, and County Code Chapter 5.60, *Cannabis Operations*; and

**WHEREAS**, commercial cannabis activities are prohibited in residential land use designations; and

**WHEREAS**, a property owner may initiate a change of the land use designation of parcels under their ownership through a GPA; and

**WHEREAS**, the property owner of Accessor's Parcel Number 025-020-013 and 025-040-002 has requested to change the parcel's designation from Rural Residential-40 to Specific Plan, which is henceforth to be referenced as GPA 24-01, for the purpose of creating a commercial cannabis operation that will include the cultivation, processing, and distribution of cannabis; and

**WHEREAS**, a review and analysis of the proposed project has been completed, a Specific Plan developed to administer desired land uses and development standards, and a Mitigated Negative Declaration prepared in compliance with the California Environmental Quality Act; and

**WHEREAS**, environmental factors potentially affected by the project include aesthetics, biological resources, tribal cultural resources, cultural resources, air quality, and mandatory findings of significance including the potential to substantially degrade the quality of the environment and the potential to cause substantial adverse effects on human beings, either directly or indirectly; and

Resolution R24-\_\_ and Ordinance ORD24-\_\_  
Mono County Board of Supervisors  
January 16, 2024

1           **WHEREAS**, the affected environmental factors may be mitigated to a level that is less  
2 than significant by enacting mitigation measures listed in the Apogee Farm Mitigated Negative  
3 Declaration; and

4           **WHEREAS**, duly noticed public hearings on the proposed project were held before the  
5 Planning Commission on October 3, 2022, and the Board of Supervisors on January 16, 2024.

6           **NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF**  
7 **MONO FINDS AND RESOLVES THAT:**

8           **SECTION ONE:** Having reviewed and considered all the information and evidence  
9 presented to it, including public testimony, written comments, staff reports and presentations,  
10 and the recommendation of the Planning Commission, the Board of Supervisors certifies the  
11 Mitigated Negative Declaration (MND) and adopts the Mitigation Monitoring and Reporting  
12 Program (MMRP), which are attached hereto and incorporated by reference, and finds that, on  
13 the basis of the whole record, including the initial study and comments received, there is no  
14 substantial evidence that the project will have a significant effect on the environment and that  
15 the MND reflects the County’s independent judgement and analysis.

16           **SECTION TWO:** Having reviewed and considered all information and evidence  
17 presented, including public testimony, written comments, the Mitigated Negative Declaration  
18 and staff report and presentations, the Board of Supervisors approves General Plan Amendment  
19 24-01 changing the current land use designation of RR-40 to Specific Plan for parcels 025-020-  
20 013 and 025-040-002, which are incorporated herein by reference, finding that:

21           A. *The proposed change in land use designation is consistent with the text and maps of*  
22 *this General Plan;*

23           The proposed land use designation, Specific Plan, is consistent with the text and maps  
24 of the General Plan. The Specific Plan designation may be applied to any large  
25 property, outside existing communities, to provide for planned development. The  
26 Specific Plan establishes development standards and permissible uses. For this project,  
27 the development standards and permissible uses are listed in the Apogee Farm  
28 Specific Plan, Chapter IV. Land Use Designation Regulatory Provisions.

29           The proposed changes to the land use designation are consistent with General Plan  
30 Land Use (LU) Element policies directing the County to utilize the specific plan  
31 process for large-scale projects and to mitigate impacts resulting from commercial  
32 cannabis activity. (LU Element Objective 1.L, Policies 1.L.1., 1.L.3, and 1.L.4).

          The designation change is reasonable within the context of providing compatible land  
uses within the Tri-Valley and does not alter the adopted policies for the Tri-Valley in  
a manner inconsistent with the text or maps of the General Plan.

1 B. *The proposed change in land use designation is consistent with the goals and policies*  
2 *contained within any applicable area plan;*

3 The proposed change in land use designation is consistent with the goals and policies  
4 for the Tri-Valley Area Plan, including the following Issues/Opportunities and  
5 Constraints and Tri-Valley Policies.

6 Issues/Opportunities and Constraints

7 “2. There is a desire to maintain and enhance agricultural uses in the Tri-Valley.”  
8 The Specific Plan written for this project will maintain consistency with the existing  
9 density allowed for the parcels. The proposed use of the property, cannabis  
10 cultivation, is similar to an agricultural use.

11 “3. The Tri-Valley area is experiencing increasing pressure for residential  
12 development. Residents in the Tri-Valley are concerned about that pressure and  
13 would like to retain the current rural-residential character of the area.”

14 The designation change for the property will retain the rural-residential character of  
15 the area. The Specific Plan allows for an agricultural use with limited residential  
16 capacity. The commercial operation will be operated by the property owner living on  
17 site and may employ two additional employees. The project will not induce  
18 population growth in the area.

18 “4. Parts of the Tri-Valley area are subject to flooding.”

19 A portion of the property is subject to flooding. A mitigation measure for this project  
20 prohibits future development within any stream, riparian habitat, sensitive natural  
21 communities, or other water bodies in the project area. No future development would  
22 occur in the floodplain (MMRP BIO-3).

22 Tri-Valley Policies

23 “Action 26.A.1.c. Require new development to provide adequate buffering of  
24 incompatible uses (e.g., landscaping, physical barriers, large setbacks) to protect  
25 agricultural areas from residential and other incompatible land uses.”

26 The new cannabis operation will be located on the northern parcel leaving the  
27 southern parcel as a buffer between the operation and nearest residential parcel to the  
28 south (22889 Hwy 6). The adjacent property to the west is designated Industrial and  
29 contains a single residential unit along with vehicles and trailers in various states of  
30 disrepair. The cannabis operation will be setback over 300’ from the shared property  
31 line.

31 C. *The site of the proposed change in land use designation is suitable for any of the land*  
32 *uses permitted within that proposed land use designation;*

1  
2 The site of the proposed change in land use designation is suitable for uses permitted  
3 within the Specific Plan. The use is similar to the adjacent agricultural use and less  
4 intense than the adjacent industrial use. The project site contains an approved well,  
5 but no other uses, and is large enough to provide a significant portion of needed  
6 infrastructure improvements, including roads meeting fire safe standards (LU  
7 Element Chapter 22 and 14 California Code of Regulations § 1273.00, et seq.), an  
8 onsite wastewater treatment system, and water supply from the well, among other  
9 infrastructure. The proposed uses limit water consumption over traditional  
10 agricultural crops, therefore it is a suitable land use designation change. It is suitable  
11 for the proposed commercial cannabis use, which will provide employment and  
12 economic opportunity for the applicant. Residential units will be tied to the  
13 commercial components; the applicant will live on site and may provide housing for  
14 labor.

15  
16 D. *The proposed change in land use designation is reasonable and beneficial at this  
17 time; and*

18 The land use designation change will allow the applicant to conduct a commercial  
19 cannabis cultivation operation while maintaining the residential density allowed at the  
20 property and avoiding sensitive habitat. The change of the land use designation is  
21 appropriate for conducting a commercial cannabis operation, as commercial cannabis  
22 operations are prohibited in residential designations. Commercial cannabis is a new  
23 industry, approved by the majority of residents in Mono County, evident by the 2016  
24 statewide election result of Proposition 64, the Adult Use of Marijuana Act, and  
25 affirmed by the Mono County Board of Supervisors in 2017 in approving Resolution  
26 R17-88, initiating and adopting General Plan Amendment (GPA) 17-03/Cannabis,  
27 establishing policies governing commercial cannabis activity.

28 E. *The proposed change in land use designation will not have a substantial adverse  
29 effect on surrounding properties.*

30 As described in the MND for the project and associated Mitigation Monitoring and  
31 Reporting Plan, impacts to surrounding properties have been reduced to less than  
32 significant levels. Including impacts to aesthetics, biological resources, tribal cultural  
resources, cultural resources, and air quality. Properties surrounding the project site  
are sparsely populated, or vacant, or used for agriculture or storage.

Potential direct adverse effects to specific surrounding properties include aesthetics,  
mitigated by requiring compliance with General Plan Chapter 23, Dark Sky  
Regulations, and air quality, mitigated with odor control measures.

**FURTHER, THE BOARD OF SUPERVISORS OF THE COUNTY OF MONO  
ORDAINS AS FOLLOWS:**

Resolution R24-\_\_ and Ordinance ORD24-\_\_  
Mono County Board of Supervisors  
January 16, 2024

1           **SECTION ONE:** That the Apogee Farm Specific Plan, which is attached hereto and  
2 incorporated by this reference, is consistent with the Mono County General Plan and is hereby  
3 adopted by the Board.

4           **SECTION TWO:** Having reviewed and considered all information and evidence  
5 presented, including public testimony, written comments, Mitigated Negative Declaration and  
6 staff report and presentations, the Board approves the equivalent of a Use Permit for  
7 commercial cannabis activities as part of the Apogee Farm Specific Plan, including Conditions  
8 of Approval, finding that:

9           A. *All applicable provisions of the Land Use Designations and Land Development*  
10 *Regulations are complied with, and the site of the proposed use is adequate in size*  
11 *and shape to accommodate the use and to accommodate all yards, walls and fences,*  
12 *parking, loading, landscaping and other required features.*

13           The Apogee Farm Specific Plan designates the land use of the property and is  
14 intended to accommodate the commercial cannabis activity. The property is adequate  
15 in size and shape to accommodate the cannabis activity, meeting all development  
16 standards and minimizing potential impacts on adjacent neighbors. The cannabis  
17 activity will be setback a minimum of 50’ from all property lines. Access is required  
18 to be improved to meet Mono County General Plan Chapter 22, Fire Safe Regulations,  
19 and sufficient parking shall be provided on site for employees and the property owner.

20           B. *The site for the proposed use relates to streets and highways adequate in width and*  
21 *type to carry the quantity and kind of traffic generated by the proposed use.*

22           The site is able to carry the quantity and kind of traffic generated by the use. The  
23 property is accessible from Highway 6, which is a major interstate highway and will  
24 not be open to the public. Vehicle trips will include employees (two) traveling to and  
25 from the site, product distribution vehicles, and the property owner. The project is  
26 required to comply with requirements of Caltrans District 9, for encroaching U.S.  
27 Route 6. Traffic generated by the project will not impact the existing transportation  
28 corridor.

29           C. *The proposed use will not be detrimental to the public welfare or injurious to*  
30 *property or improvements in the area in which the property is located.*

31           The proposed use has been mitigated to minimize impacts to the public, as described  
32 in the Mitigation Monitoring and Reporting Plan. The cannabis activity will take  
place on the northern parcel. The southern parcel will not be developed and will  
provide a 1,000’ buffer between the project site and the nearest neighbor (22889 U.S.  
Route 6). Odor control measures have also been identified for greenhouses where  
cultivation takes place. The applicant will install a Cannabuster odor elimination  
system or equivalent.

1 D. *The proposed use is consistent with the map and text of th[e] General Plan and any*  
2 *applicable area plan.*

3 The proposed use is consistent with the General Plan and area plans, as amended by  
4 GPA 24-01. The Tri-Valley is intended to provide for agricultural operations, similar  
5 to the project. The project meets General Plan standards and regulations for cannabis  
6 activities, as defined in Chapter 13, Commercial Cannabis Activities.” Compliance  
7 with Mono County Code Chapter 5.60, Commercial Cannabis Operations, and all  
County Code and General Plan regulations will be met.

8 **SECTION THREE:** Having reviewed and considered all information and evidence  
9 presented, including public testimony, written comments, the Mitigated Negative Declaration  
10 and Mitigation Monitoring and Reporting Program, staff report, and presentations, the Board  
11 approves commercial overhead power as part of the Apogee Farm Specific Plan, finding that:

12 *In granting a permit for overhead utility lines, the [County] shall make at least one of*  
13 *the following findings [set forth in Mono County General Plan Land Use Element*  
14 *Chapter 11.010.D.] in addition to the required Director Review or Use Permit findings,*  
15 *and shall also require anticipated impacts from the proposed use be avoided, minimized,*  
16 *or mitigated to the extent possible:*

17 **Finding to be made (§11.010.D.4.):**

18 4. *The exclusive purpose of the overhead line is to serve an agricultural operation.*  
19 *For the purposes of this section, agricultural operations are defined as use of the*  
20 *land for the production of food and fiber, including the growing of crops and*  
21 *grazing of livestock. Above-ground utility lines may be permitted for agricultural*  
22 *uses such as pumps and similar uses.*

23 a. *Impacts to sensitive species, such as the Bi-State Distinct Population*  
24 *Segment of Greater Sage Grouse shall be avoided, minimized, or mitigated*  
25 *consistent with policies in the Conservation/Open Space Element.*

26 This finding can be made because the exclusive purpose of the overhead line  
27 is to serve an agricultural operation and associated residential uses. Greater  
28 Sage-Grouse species have not been determined to breed, nest, or populate  
29 this region of the County, and therefore predator perches on overhead lines  
30 are not a concern. The disturbance area associated with power poles for the  
31 overhead line is significantly reduced compared to trenching to lay an  
underground line, which minimizes impacts. Further, the MND found no  
sensitive plant species on the site, and the MMRP prohibits development in  
sensitive habitats, requires mitigation for impacted riparian habitat, avoids  
identified cultural resources, and requires nesting bird surveys prior to  
construction.

32 **Analysis of other potential findings: no anticipated impacts are identified.**

1           1. *The overhead line placement will not significantly disrupt the visual character of*  
2           *the area. In making this determination, the [County] shall consider the*  
3           *following:*

4           a. *In areas without a number of existing overhead lines in the immediate*  
5           *vicinity, would overhead lines create the potential for a significant*  
6           *cumulative visual impact; i.e., would allowing an overhead line be likely to*  
7           *result in future requests for additional overhead lines in the area? If so, it*  
8           *may be determined that an overhead line will have a significant impact on*  
9           *the visual character of the area.*

10           Overhead lines are located on the western side of the US 6 in this area;  
11           therefore, the new line would not need to cross the highway. Approximately  
12           1,100' south of the project boundary, the adjacent parcel, developed in 1994,  
13           contains overhead power. One parcel west of the project site is privately  
14           owned and could develop the need for electrical lines. All other parcels to the  
15           west of the project are owned by the Bureau of Land Management.  
16           Accordingly, the potential for a significant cumulative visual impact would  
17           not be created.

18           b. *Does the topography or vegetation in the area effectively screen the*  
19           *proposed lines? If so, then an additional line may not significantly disrupt*  
20           *the visual character of the area.*

21           The topography slopes down from the site, towards Route 6, and therefore  
22           the lines will trend upwards at a very low angle against a backdrop of  
23           sagebrush scrub rather than silhouetted against the sky, minimizing any  
24           visual impact.

25           c. *Are there other potential alignments that would have less visual impact?*

26           There are no potential alignments that would have less visual impact.

27           d. *Does the project reduce the overall number of overhead lines and poles in*  
28           *the area; are the lines co-located with existing facilities; and/or do design*  
29           *features such as height of lines, size, color, reflectivity, tension in line, or*  
30           *other features reduce visual impacts? If so, it may be determined that an*  
31           *overhead line will not have a significant impact on the visual character of the*  
32           *area. The [County] may consider additional information pertaining to the*  
33           *visual character of the area that is deemed relevant to the application.*

34           As previously noted, the parcel is bounded to the west by lands managed by  
35           the Bureau of Land Management and on other sides primarily by parcels with  
36           existing overhead utilities. Because the privately owned land in the vicinity  
37           is already largely served by overhead utilities, there is little potential for



1 additional expansion, and the lines would be placed in already-disturbed  
2 areas, there will not be a significant change to the visual character of the area.

3 2. *The placement of utility lines above ground is environmentally preferable to*  
4 *underground placement and does not create public health and safety impacts. In*  
5 *making this determination, the [County] shall consider the following:*

6 a. *Will underground placement disturb an environmentally sensitive area,*  
7 *including but not limited to the following: cultural resource sites, significant*  
8 *wildlife habitat or use areas, riparian or wetland areas, or shallow*  
9 *groundwater? If so, above-ground placement may be preferable;*

10 Undergrounding the utility line would require trenching under Spring  
11 Canyon Creek and the surrounding floodplain. The floodplain encompasses  
12 Rubber Rabbit Brush Scrub Shrubland Alliance vegetative communities  
13 which occurs as the grade tapers off near the bottom of the valley, portions of  
14 which historically were flooded. This area still accumulates moisture and  
15 supports more facultative species, although vegetation surveys did not  
16 identify the presence of any sensitive species. Above-ground placement is  
17 environmentally preferred.

18 b. *Will overhead placement cause impacts to sensitive species, such as the Bi-*  
19 *State Distinct Population Segment of Greater Sage-Grouse, or other*  
20 *environmental impacts? If so, aboveground placement may not be preferable,*  
21 *or perch deterrents and other mitigations may be required (see policies in the*  
22 *Conservation/Open Space Element);*

23 Greater Sage-Grouse species have not been determined to breed, nest, or  
24 populate this region of the County, and therefore predator perches on  
25 overhead lines are not a concern. The disturbance area associated with power  
26 poles for the overhead line is significantly reduced compared to trenching to  
27 lay an underground line, which minimizes impacts. Further, the MND found  
28 no sensitive plant species on the site, and the MMRP prohibits development  
29 in sensitive habitats, requires mitigation for impacted riparian habitat, avoids  
30 identified cultural resources, and requires nesting bird surveys prior to  
31 construction.

32 c. *Will underground placement require disturbance of a waterway, including*  
*perennial, intermittent and seasonal streams? If so, above-ground placement*  
*may be preferable;*

Yes, underground utility lines would disturb Spring Canyon Creek, and an  
ephemeral drainage along this portion of US 6. Above-ground placement is  
preferred.

1 d. *Will underground placement increase the utility line's exposure to*  
2 *environmental hazards, such as flood hazards, fault hazards or liquefaction?*  
3 *If so, above-ground placement may be preferable;*

4 Yes, the utility lines would be undergrounded through Spring Canyon Creek,  
5 exposing them to flood hazards. Above-ground placement is preferred.

6 e. *Are there other potential alignments that would avoid potential*  
7 *environmental impacts?; and*

8 An above-ground alignment would avoid environmental impacts. The desired  
9 alignment will follow pre-disturbed land to minimize impacts.

10 f. *Are there adequate provisions for long-term maintenance and fire-hazard*  
11 *mitigation? If so, above-ground placement may be acceptable. The Director*  
12 *or the Commission may consider additional information pertaining to the*  
13 *environmental sensitivity of the area that is deemed relevant to the*  
14 *application.*

15 Overhead power poles would be located on the applicant's property and shall  
16 be maintained by the property owner to prevent wildfire. The utility company  
17 will provide additional vegetation maintenance around the poles every three  
18 to five years. Poles would be located between the applicant's development  
19 and U.S. 6 which can be visually monitored for fire-hazards.

20 3. *The installation of underground utilities would create an unreasonable financial*  
21 *hardship on the applicant due to the unique physical characteristics of the*  
22 *property. In making this determination, the Director or the Commission shall*  
23 *consider the following:*

24 a. *Is the cost of the line to be installed excessive?*

25 The applicant met on-site with Tim Rafferty, Southern California Edison  
26 staff, to gain an estimate on the project. SCE estimated a cost of \$20,000 to  
27 complete the overhead electrical drop and undergrounding to the property  
28 line. Undergrounding from the property line to the structures is estimated to  
29 cost an additional \$20,000, for a total of \$40,000.

30 b. *Will the installation of underground utilities require trenching under a*  
31 *stream bed?*

32 Yes, the installation of underground utilities would require trenching under a  
stream bed.

1 c. *Will the installation of underground utilities require unreasonable trenching*  
2 *or blasting through rock?*

3 No, unreasonable trenching or blasting through rocks would not be required.

4  
5 d. *Are there alternate alignments that would eliminate or significantly lessen*  
6 *the financial hardship? The Director or the Commission may consider other*  
7 *site specific financial hardships deemed relevant to the application.*

8 There are no alternative alignments that would eliminate or significantly  
9 lessen the financial hardship.

10 **SECTION FOUR: Those matters resolved by the Board herein shall be effective**  
11 **upon adoption and those matters ordained herein** shall become effective 30 days from  
12 the date of adoption and final passage, which appears immediately below. The Clerk of  
13 the Board of Supervisors shall post and publish this resolution and ordinance in the  
14 manner prescribed by Government Code section 25124 no later than 15 days after the  
15 date of this ordinance's adoption and final passage. If the Clerk fails to publish this  
16 ordinance within said 15-day period, then the ordinance shall not take effect until 30 days  
17 after the date of publication.

18 **PASSED, APPROVED and ADOPTED** this 16th day of January, 2024, by the following vote,  
19 to wit:

20 **AYES:**

21 **NOES:**

22 **ABSENT:**

23 **ABSTAIN:**

24  
25 \_\_\_\_\_  
26 John Peters, Chair  
27 Mono County Board of Supervisors

28 **ATTEST:**

29 **APPROVED AS TO FORM:**

30  
31 \_\_\_\_\_  
32 Clerk of the Board

30  
31 \_\_\_\_\_  
32 Stacey Simon  
County Counsel

Resolution R24-\_\_ and Ordinance ORD24-\_\_  
Mono County Board of Supervisors  
January 16, 2024

# MONO COUNTY

## Community Development

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PO Box 347  
Mammoth Lakes, CA 93546  
760.924.1800, fax 924.1801  
commdev@mono.ca.gov

PO Box 8  
Bridgeport, CA 93517  
760.932.5420, fax 932.5431  
[www.monocounty.ca.gov](http://www.monocounty.ca.gov)

Date: December 29, 2023

To: Mammoth Times

From: Heidi Willson

Re: Legal Notice for the **January 4** issue.

Format: Please publish as a minimum 1/8-page legal notice

Invoice: Deanna Tuetken, PO Box 347, Mammoth Lakes, CA 93546

---

### NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Board of Supervisors will conduct a public hearing on **January 16, 2024**. The meeting will be held virtually at <https://monocounty.zoom.us/j/86184622677> and in the Mono Lake Room of the Mono County Civic Center, First Floor, 1290 Tavern Road, Mammoth Lakes, CA 93546 where members of the public shall have the right to observe and offer public comment to consider the following: **no earlier than 9:00 a.m. Apogee Farms Specific Plan (SP) and General Plan Amendment (GPA)**. The Project proposes a GPA to change the land use designation of two parcels (APN 025-020-013 and 025-040-002) from "Rural Residential" to "Specific Plan" and a SP to construct and operate a commercial cannabis production, processing, and distribution facility at 23555 Highway 6 (APN 025-020-013), with the owner/operator living on site. The project site is approximately 2.5 miles south of Benton and west of U.S. Route 6 (Highway 6). The SP would incorporate the Conditional Use Permit and establish permitted land uses and required development standards. Commercial cannabis totaling 8,640 square feet would be cultivated on site starting outdoors and then transitioning into three greenhouses. Greenhouses would be equipped with light-emitting diodes (LED) for supplemental light and automatic black-out curtains to prevent light leakage from dusk to dawn. A facility on-site would be used for processing and packaging the cannabis. The business would then distribute product to off-site retailers. A Mitigated Negative Declaration is provided with the project in compliance with the California Environmental Quality Act. The Mono County Planning Commission has recommended that the Board of Supervisors certify the Mitigated Negative Declaration, including adoption of the Mitigation Monitoring and Reporting Program, adopt the General Plan Amendment and the Apogee Farms Specific Plan, and make Use Permit findings to allow cannabis operations and overhead utility lines. INTERESTED PERSONS are strongly encouraged to attend online or in person to comment, or to submit comments to the Secretary of the Planning Commission, PO Box 347, Mammoth Lakes, CA, 93546, by **5 pm on Monday, January 15**, to ensure timely receipt, or by email at [cddcomments@mono.ca.gov](mailto:cddcomments@mono.ca.gov). If you challenge the proposed action(s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered at or prior to the public hearing.

###



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: County Administrative Office**

**TIME REQUIRED** 15 minutes

**PERSONS APPEARING BEFORE THE BOARD** Tom Parker, Chief Executive Officer

**SUBJECT** Mammoth Hospital Expansion - Update

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Presentation on the update of the Mammoth Hospital expansion.

**RECOMMENDED ACTION:**

None, informational only.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Sandra Moberly

**PHONE/EMAIL:** /

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|                              |
|------------------------------|
| Click to download            |
| <a href="#">Presentation</a> |

**History**

| Time              | Who                          | Approval |
|-------------------|------------------------------|----------|
| 1/9/2024 3:36 PM  | County Counsel               | Yes      |
| 1/3/2024 2:43 PM  | Finance                      | Yes      |
| 1/10/2024 8:22 AM | County Administrative Office | Yes      |



*Building the Future*

# THE NORTH WING PROJECT

---

Fall 2023



# NORTH WING PROJECT

## ABOUT

- Mammoth Hospital's largest building project since opening its doors in 1978.
- The new building will provide state-of-the-art facilities that will allow Mammoth Hospital to maintain advanced, local inpatient medical care and comprehensive preventative care.
- Slated to begin in the spring of 2025 with an expected completion in 2028.



# THE WHY

- The project is necessary for Mammoth Hospital to comply with the Alquist Act (SB1953) by Jan 1, 2030, which requires that hospitals in the State of California be seismic compliant or could risk losing their licensure.
- Mammoth Hospital has seen a 162% increase in our outpatient procedures (endo/colonoscopies) in the last 10 years. The current facility is not adequate to provide proper care to our patients.
- In the event of a natural disaster, such as a wildfire or earthquake, Mammoth Hospital needs to be structurally sound to provide a place where residents and visitors can shelter safely.
- Removal of asbestos.
- The outdated current facility was built in 1978 and it lacks the modern facilities needed for today's patient care services.





# WHY NOT FIX THE CURRENT BUILDING?

- The current hospital is nearly 50 years old.
- Mammoth Hospital worked closely with the architectural firm, Greenbough Design, to weigh all options for how to meet the seismic regulations. Ultimately it was deemed that a retrofit would not be viable and that a new facility is needed:
  - The existing building has load-bearing walls that don't allow for the flexibility in design needed for a modern medical facility.
  - Retrofitting the existing building would be expensive and would not allow for any increase in capacity.



# IMPROVEMENTS

## PRIVATE SINGLE OCCUPANCY PATIENT ROOMS

- Single occupancy rooms are the standard in healthcare and reduces the chances of infection for the patient.
- Improved family and caregiver support.
- The rooms will be placed on the upper floor with noise cancelling windowpanes allowing for a better patient experience.
- Increased sunlight and views to promote healing.



# IMPROVEMENTS: ICU

- **ALL ICU ROOMS WILL HAVE WINDOWS**

*Our current ICU beds do not offer windows.*

- **INCREASE IN SPACE PER PATIENT**

*The new space will offer 2.5X the current space per patient.*

- **ADDING BATHROOMS & SHOWERS**

*Our current ICU rooms do not offer private bathrooms and showers.*

- **ABILITY TO USE AS MED/SURG IF NEEDED**

*The new design will allow the ICU rooms to be used as “flex” spaces should the hospital have an overflow in Med/Surg.*





## IMPROVEMENTS: ENDOSCOPY



- **EXPANDED CAPACITY FOR SURGERY RECOVERY AREAS**

*Allows for increased surgical procedures and faster turnover rates in the OR. Current PACU is utilized for outpatient procedures causing a bottleneck.*

- **HOSPITAL WILL BE PREPARED FOR INCREASED SAME DAY SURGERIES**

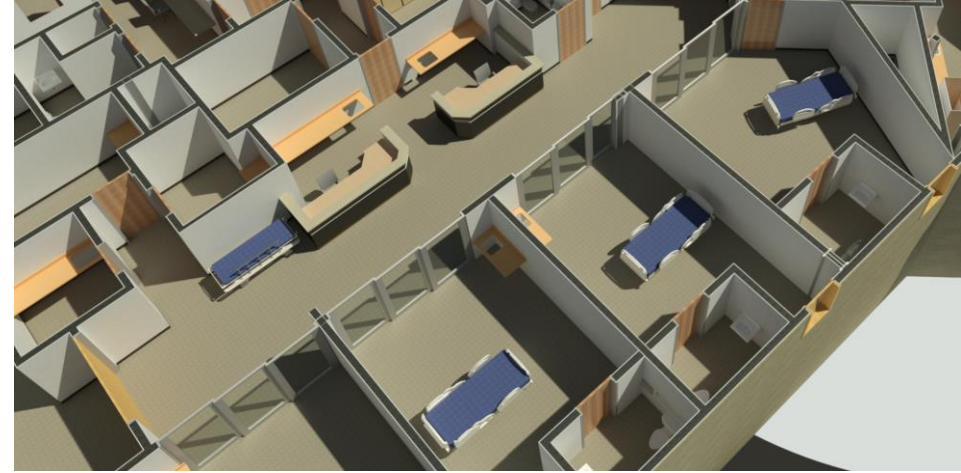
*Same day outpatient surgeries are increasing, and the Endoscopy suite will ensure Mammoth Hospital is ready for this continued shift in healthcare.*

# IMPROVEMENTS

- **NEW CAMPUS ENTRANCE & LAYOUT**

*A more intuitive flow for patients and visitors around campus, increased parking, and easier access to the Emergency Room.*

- **ADDING WINDOWS FOR CHEMO PATIENTS**
- **ABILITY TO ATTRACT AND RETAIN THE MOST QUALIFIED PHYSICIANS, NURSES, AND SPECIALISTS**
- **EASIER ACCESS TO MEDICAL RECORDS AND PRIVATE BILLING AREAS FOR DISCUSSION**





# MAINTAINING PATIENT CARE DURING CONSTRUCTION

- The new facility will be built in between the Mono County Administration Building and the existing hospital.
- There will be little to no disruption in medical services during construction.

# FUNDING SOURCES

- Mammoth Hospital Cash Reserves
- Potential Revenue or General Obligation Bonds
- Mammoth Hospital Foundation Capital Campaign



# Design Philosophy

- **Consistent** with existing buildings on campus
- **Functional** for patients, family and staff
- **Durable** to well withstand the local environment
- **Affordable** to be responsible stewards of limited resources
- **Aesthetically** pleasing







THANK YOU





**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Board of Supervisors, Sponsored by Supervisor Gardner**

**TIME REQUIRED** 15 minutes

**PERSONS APPEARING BEFORE THE BOARD**

Scott Armstrong, Regional Broadband Coordinator

**SUBJECT** Inyo-Mono Broadband Consortium Update

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Presentation from Scott Armstrong, Regional Broadband Coordinator, on broadband-related activities.

**RECOMMENDED ACTION:**

None, informational only.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Danielle Patrick

**PHONE/EMAIL:** 7609325535 / despinosa@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|  |
|--|
| Click to download                        |
| <a href="#">Staff Report</a>             |
| <a href="#">Power Point Presentation</a> |

**History**

| Time             | Who            | Approval |
|------------------|----------------|----------|
| 1/9/2024 3:37 PM | County Counsel | Yes      |
| 1/3/2024 2:46 PM | Finance        | Yes      |

1/10/2024 8:21 AM

County Administrative Office

Yes



# COUNTY OF INYO

SCOTT ARMSTRONG  
REGIONAL BROADBAND COORDINATOR



**DATE:** January 16, 2024  
**TO:** Mono County Board of Supervisors  
**FROM:** Scott Armstrong, Regional Broadband Coordinator

**Subject**

Receive a presentation from Scott Armstrong, Regional Broadband Coordinator, on broadband-related activities.

**Recommended Action**

None

**Discussion**

This is an informational presentation on broadband-related activities.

**Fiscal Impact**

No fiscal impact. This is an information item only.

Thank you very much for your consideration,

Scott R. Armstrong  
Regional Broadband Coordinator  
For the Eastern Sierra Council of Governments  
County of Inyo, California

Attachments: 2024 01 16 Mono Broadband Update PowerPoint Presentation



# Broadband Update Mono County

January 16, 2024

<https://ConnectedEasternSierra.net/>



# Overview

- Grants Update
- Middle-Mile Broadband Initiative
- IMBC Work Plan Updates
- *Public Outreach and Engagement*
- Mono County Broadband Strategic Plan
- Other Activities
- Acronyms for Reference



# Grant Updates

- CASF Consortia Grant
- CPUC FFA Grant
- CPUC LATA Grant
- BEAD
- CASF Infrastructure Account
- USDA RD Broadband Technical Assistance





## Grants: Consortia Grant

- Grant Year 1 of 3 ends January 31, 2023
- Working on 2nd Semiannual Reporting and Audit



## Grants: FFA

- Grant Applications Submitted for Our Region
- Currently in the [Challenge Process](#)
- CPUC May Allow Applicants to Amend Applications
- Expected Award Notifications in January
- Allocations: \$13,220,000 for Inyo, \$10,600,000 for Mono
- Second Application Window – 2024 Q1



# Grants: LATA

- Current Status of Mono & Mammoth LATA Grants
  - Grant Activities are through the GSCA JPA
  - Low-Level Design In Progress
- Current Status of Inyo LATA Grants
  - Phase 1-A Designs Nearing Completion
  - Phase 1-B Contract Awarded, designs due January 25, 2024



# Grants: BEAD

- NTIA BEAD Allocation for California: \$1.86B
- Five-Year Plan Submitted to NTIA on August 28, 2023
- Goal: [Broadband Service at 100Mbps/10Mbps for All](#)
- Next Steps:
  - NTIA Initial Proposal Approval in 2024
  - CPUC Selects Subgrantees
  - Final Proposal due One Year Later (2025)



## Grants: CASF Infrastructure

- Next Grant Application Window is Not Yet Open
- Next Grant Application Window closes April 1, 2024
- Providers and Local Governments can Apply
- Allows Fixed Wireless for Last Mile



## Grants: USDA RD

- USDA RD Broadband Technical Assistance:
  - Hammil & Furnace Creek Applications Awarded on November 13
  - Award Letters and Cooperative Agreements Signed December 5



# Middle-Mile Broadband Initiative

- MMBI (the Project) & MMBN (the Network)
  - Current [MMBI Network Map](#)
  - Construction, Purchases, Leases and Joint Builds
  - Committed to all 10,000+ miles, 7,000 miles within the next 18 months
  - Interconnects every 2500 feet
- MMBI Purchase of Digital 395 Network
  - Asset Purchase Agreement Signed
  - NTIA Petition for Waiver Submitted September 29
  - Next Step: Membership and Class A Membership Board Approval
  - Closing requires NTIA Waiver, Membership Approval & Other Conditions



# Work Plan Updates

- Service Issue [Escalation Tools](#)
- Updated [Unserved Data](#) for all Potential Project Areas
- Speed Test Reporting: Latency Data Fields for BEAD
- Added a [Resources](#) Page





# Public Outreach & Engagement

- <https://connectedeasternsierra.net/broadband/get-involved/>
- Short Survey to Gather Input
- Speed Test Data – [Interactive Graphs](#)



# Mono Broadband Strategic Plan

- Roadmap for Mono County to Improve Internet Access
- Plan will Recommend Strategies to Overcome Challenges
- Process is Based on [Pew Charitable Trust](#) Recommendations
- Participation from County and Town
- Gathering Data



## Other Activities

- Participated in CPUC BEAD Workshop October 26



# Acronyms

- ACP – Affordable Connectivity Program
- BEAD – Broadband Equity, Access, and Deployment (NTIA grant program)
- CASF – California Advance Services Fund (within the CPUC)
- CBC – California Broadband Cooperative (Digital 395 network)
- CDT – California Department of Technology
- CPUC – California Public Utilities Commissions
- FCC – Federal Communications Commission
- GSCA – Golden State Connect Authority (JPA – RCRC)
- GSN – Golden State Net – MMBI Third Party Network Administrator
- IMBC – Inyo-Mono Broadband Consortium (ESCOG, CASF Consortia Grant)
- JPA – Joint Powers Authority
- MMBI – Middle-Mile Broadband Initiative (State of California project)
- MMBN – Middle-Mile Broadband Network (GSN-managed network)
- NTIA – National Telecommunications & Information Administration
- RCRC – Rural County Representatives of California
- USDA RD – US Department of Agriculture Rural Development





**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: County Counsel**

**TIME REQUIRED** 30 minutes

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

Christopher Beck, Assistant County  
Counsel

**SUBJECT** Funding Opportunities for Affordable  
Housing and Other Projects

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Provide the Board with an update regarding funding opportunities, including enhanced infrastructure financing districts (EIFDs), increase in transient occupancy tax (TOT), or other options, for affordable housing and other projects.

**RECOMMENDED ACTION:**

Provide direction to staff regarding options which should be investigated further and brought back to the Board for future action.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Christopher Beck

**PHONE/EMAIL:** 760-927-1706 /

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|                              |
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| <a href="#">Presentation</a> |

**History**

| Time             | Who            | Approval |
|------------------|----------------|----------|
| 1/2/2024 8:13 AM | County Counsel | Yes      |
| 1/3/2024 2:19 PM | Finance        | Yes      |

1/3/2024 2:52 PM

County Administrative Office

Yes

**County Counsel**  
Stacey Simon

**Assistant County Counsel**  
Christopher L. Beck

**Deputy County Counsel**  
Emily R. Fox  
Jeff Hughes

**OFFICE OF THE  
COUNTY COUNSEL**

*Mono County*

South County Offices  
P.O. BOX 2415  
MAMMOTH LAKES, CALIFORNIA 93546

**Telephone**  
760-924-1700

**Risk Manager**  
Jay Sloane

---

**Paralegal**  
Kevin Moss

To: Board of Supervisors

From: Christopher Beck, Assistant County Counsel

Date: January 9, 2024

Re: Information Item – Optional Funding Opportunities for Affordable Housing and Other  
Projects

**Strategic Plan Focus Area(s) Met**

A Thriving Economy     Safe and Healthy Communities     Mandated Function  
 Sustainable Public Lands     Workforce & Operational Excellence

**Discussion**

This item is meant to begin a series of presentations and information items, at the Board’s Direction, regarding funding sources available to Mono County for the purpose of creating affordable workforce housing, responding to increased occurrences of natural disasters, and other impacts on the County. The funding sources include an Enhanced Infrastructure Financing District (EIFD), TOT rate increase to the same rate as the Town of Mammoth Lakes (13%), as well as an Affordable Housing Agency (AHA).

***EIFD***

An Enhanced Infrastructure Finance District (which may be referred to as “EIFD” or “district”) is a governmental entity that may be established by the Board of Supervisors to use future incremental property tax revenue to fund public capital facilities and infrastructure, as well as other specified projects of county-wide significance, including affordable housing and climate change resilience projects. EIFDs are not funded by a new tax but rather by capturing all or a portion of the future property tax increment revenue (i.e., the difference in property taxes owed prior to and post establishment of the EIFD) generated within the boundaries of the district. The EIFD may finance projects through the issuance of bonds or under a “pay-go” model where money is spent as it is collected. Staff will provide a presentation covering 1) What an EIFD is, 2) How an EIFD is formed, and 3) What are the allowable uses of EIFD funds. We will provide a brief update on the TOT rate increase process and the County’s involvement in that process.



### ***TOT***

Transient Occupancy Tax (TOT) is a voter approved tax collected from lodgers, including properties rented through home sharing services like Airbnb, in unincorporated areas of Mono County. This tax is commonly referred to as a 'bed tax'. Given the TOT was established by the voters, an amendment thereto would also be submitted as a ballot measure to the voters. The TOT has been increased in the past, including in 2004 after a ballot measure was submitted to the voters. During the joint meeting with the Town Council on October 17, 2023, Board members raised the question of increasing the County's TOT to match that of the Town of Mammoth Lakes (13%). Staff has completed a cursory review of TOT receipts and determined that, using FY 2022-23 actual receipts, increasing the TOT to 13% would increase revenues by \$330,443, assuming no change in volume or room prices.

### ***AHA***

An Affordable Housing Agency (AHA) is similar to an EIFD in that it uses tax increment financing to create affordable housing. The AHA is solely focused on affordable housing where the EIFD could be used for any infrastructure project approved by the governing body of the EIFD (the Public Finance Authority).

### ***Next Steps***

This presentation is meant to introduce concepts for funding affordable housing and other priority projects. Staff can prepare future presentations to outline how these local sources can be used to leverage state and federal funds for affordable workforce housing including increasing the success rate of applications for these funds.

Staff will present on the above and receive direction, if any, from the Board of Supervisors.

The image shows the spines of several books, likely in a library or bookstore. The spines are light-colored, and the pages are visible, showing some text. The text on the pages is somewhat blurry but includes words like "ing", "it", "w.", "he", "first", "legal", "he", "ing", "th.", "ing", "pen", "said", "pare", "sing", "me".

# EIFDs

Enhanced Infrastructure  
Finance Districts – An  
Overview



# What is an EIFD?

# What is an EIFD

- Tool available to fund infrastructure projects and community improvements
- Statutorily established on January 1, 2015 by SB 628
- Established after multiple hearings to consider objections
- No further votes required, except for issuing bonds
- Previously Infrastructure Finance Districts
  - *Now: Enhanced*

# What is an EIFD

- Statutorily established on January 1, 2015 by SB 628
  - SB733 (2017) – Climate change adaptation projects
  - SB1145 (2018) – infrastructure maintenance costs

# What is an EIFD

- KEY FEATURES:

- Local government authority
  - Public Finance Authority – 5 members – Infrastructure Financing Plan
- Additional financing mechanisms
- Project types eligible for fundings (not just traditional infrastructure)
- Need to have completed all successor agency RDA tasks, if any

- BENEFITS

- Increased financing options (tax increment financing, bond financing, grants/subsidies)
- Local control and decision making
- Public-private partnerships



# How Can an EIFD Be Used?

# EIFD

- Allows local leaders to support infrastructure projects through multiple funding sources
  - Tax increment authority, benefit assessments, community facilities districts and fees
- Generally applies to every type of infrastructure:
  - Transportation
  - Water
  - Flood control and storm water
  - Energy
  - Public facilities
  - \*Required: direct connection between the needed infrastructure and the users (benefit)



# EIFD uses:

- Roads, highways and bridges
- Parking facilities
- Transit stations
- Solid waste disposal
- Child care facilities
- Environmental mitigation
- Affordable Housing



EIFDs for  
Affordable Housing

- All housing developed using EIFD must be 100% affordable (very low/low/moderate)
- 55-year deed restriction
- Aid in financing projects
- Public-private partnerships
- Financial projections will determine feasibility of use
- Includes construction, acquisition, and rehab

## Affordable Housing



# Formation of EIFDs

# Formation

- Form the Team
- Establish EIFD Feasibility
- Conduct Outreach
- Initiate Formal Process
  - Select members of PFA (5)
  - Establish PFA and adopt Resolution of Intent to Establish
  - Mail Resolution to each taxing entity and property owners

# Formation (cont.)

- PFA prepares Infrastructure Financing Plan (IFP)
  - Map and legal description
  - Description of use
  - Tax increment revenue projects
  - Financing plan
  - Fiscal impact
  - Date district will cease
  - District goals
  - Tax increment limits
- Transmit IFP to affected parties
- Notice PFA meeting PRIOR to adoption to present draft IFP

# Formation (cont.)

- Notice 1st public hearing (no sooner than 30 days after initial PFA meeting)
- Hold 1st public hearing – no action
- Notice and hold 2nd public hearing (at least 30 days after the 1st) – no action
- Notice 3rd public hearing and provide a copy of IFP
- Hold 3rd public hearing (at least 30 days after 2nd hearing)

Alternative to EIFD  
for Affordable  
Housing: Affordable  
Housing Agency



AHA

- More appropriate if the EIFD is being considered exclusively for affordable housing.
- Different than a housing authority.
- Tax increment financing exclusively for affordable housing.
- More streamlined process to establish.
- Each agency commits as much of the tax increment they would like, and that is used to bond for the creation of affordable housing.
- Board would consist of members from each agency.

Questions?



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: County Administrative Office**

**TIME REQUIRED** 20 minutes

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

Christine Bouchard, Assistant County  
Administrative Officer

**SUBJECT** Updated Diversity Equity and  
Inclusion Resolution

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Proposed resolution Affirming Mono County's Commitment to Diversity, Equity, and Inclusion (DEI).

**RECOMMENDED ACTION:**

Adopt proposed resolution. Provide any desired direction to staff.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Christine Bouchard

**PHONE/EMAIL:** 5414 / cbouchard@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|                                       |
|---------------------------------------|
| Click to download                     |
| <a href="#">Staff Report</a>          |
| <a href="#">Resolution (rev'd SS)</a> |

**History**

| Time                | Who                          | Approval |
|---------------------|------------------------------|----------|
| 12/26/2023 10:07 AM | County Counsel               | Yes      |
| 1/2/2024 10:18 AM   | Finance                      | Yes      |
| 1/8/2024 2:07 PM    | County Administrative Office | Yes      |



**COUNTY ADMINISTRATIVE OFFICER**  
**COUNTY OF MONO**  
 Sandra Moberly, MPA, AICP  
 PO Box 696  
 Bridgeport, CA 93517-0696  
 (760) 932-5410  
[smoberly@mono.ca.gov](mailto:smoberly@mono.ca.gov)  
[www.mono.ca.gov](http://www.mono.ca.gov)

**Date:** December 20, 2023

**To:** Honorable Board of Supervisors

**From:** Christine Bouchard, Assistant CAO

**Subject:** Amended Resolution Affirming Mono County's Commitment to Diversity, Equity, and Inclusion (DEI)

**BOARD OF SUPERVISORS**

CHAIR  
 Rhonda Duggan / District 2

VICE CHAIR  
 John Peters / District 4

Bob Gardner / District 3  
 Lynda Salcido / District 5  
 Jennifer Kreitz / District 1

**COUNTY DEPARTMENTS**

ASSESSOR  
 Hon. Barry Beck

DISTRICT ATTORNEY  
 Hon. David Anderson

SHERIFF / CORONER  
 Hon. Ingrid Braun

ANIMAL SERVICES  
 Chris Mokracek "Interim"

BEHAVIORAL HEALTH  
 Robin Roberts

COMMUNITY DEVELOPMENT  
 Wendy Sugimura

COUNTY CLERK-RECORDER  
 Queenie Barnard

COUNTY COUNSEL  
 Stacey Simon, Esq.

ECONOMIC DEVELOPMENT  
 Jeff Simpson

EMERGENCY MEDICAL  
 SERVICES  
 Bryan Bullock

EMERGENCY MANAGEMENT  
 Chris Mokracek

FINANCE  
 Janet Dutcher  
 CPA, CGFM, MPA

HEALTH AND HUMAN  
 SERVICES  
 Kathryn Peterson

INFORMATION  
 TECHNOLOGY  
 Mike Martinez

PROBATION  
 Karin Humiston

PUBLIC WORKS  
 Paul Roten

**Recommended Action:** Adopt proposed amended resolution; provide any desired direction to staff.

**Discussion:** In October 2020 the Board of Supervisors adopted a resolution declaring racism as a public and mental health crisis and affirmed Mono County's commitment to building equity and reducing disparity. The Board provided direction to staff to return with specific activities to address systemic racism and disparity in Mono County government. Since that time the County has experienced changes in leadership stalling forward progress of the program.

The new leadership in the CAO's office has committed to moving forward with implementing a DEI program dedicated to addressing racial disparity and its negative impacts, and to equity in county government and communities. This first step proposes amending the original resolution as well as changing the name of the program from JEDI (Justice, Equity, Diversity, and Inclusion) to DEI (Diversity, Equity, and Inclusion).

**Background:** Since the adoption of resolution R20-93, there has been minimal work completed on this program. The most recent update to the Board was March 15, 2022, providing an updated three Phase Strategy-Building an Infrastructure for Race Equity in Mono County. However, this strategy did not move forward, and minimal Countywide progress has been accomplished.

Though there are steps that can be taken immediately, such as scheduling and holding training sessions, the resolution directs the CAO to develop a work plan and financial commitment of which funding has already been committed. The actions/directions include:

§ The County Administrative Officer is directed to develop a workplan that includes at a minimum, the following:

- A description of the County's goals for diversity, equity and inclusion, both within the community and within the County's operations; and

- Information regarding the creation of a DEI Work Team comprised of County employees to develop and implement DEI initiatives across all County Departments; and
- Plan for engagement with employees and outreach opportunities with community members to actively seek their input and insight to ensure a more inclusive work environment and equitable service delivery; and
- Identification of specific, measurable, achievable, relevant and time-bound measures which the County can undertake to further the identified diversity, equity and inclusion goals; and
- A description of the mechanisms, staffing, timing and other details required to carry out these measures and how adjustments will be made as needed; and
- A proposed budget for the work; and
- A communication plan for employees and the community to disseminate information on the County's DEI goals and progress; and
- A timeline and schedule for tracking and reporting on the County's progress toward its goals and commitments.

**Fiscal Impact:** None associated with adoption of the resolution and program name change, however the resolution includes direction to take action that could result in future unknown fiscal impacts, as described in the staff report.



R24-\_\_

**A RESOLUTION OF THE MONO COUNTY BOARD OF SUPERVISORS  
AFFIRMING MONO COUNTY'S COMMITMENT TO  
DIVERSITY, EQUITY, AND INCLUSION (DEI)**

**WHEREAS**, throughout our nation's history, institutional and structural racism, discrimination, and injustice have led to deep and persistent disparities across all sectors and have had lasting negative consequences nationally and within Mono County; and

**WHEREAS**, racism and discrimination in our country have resulted in the structuring of opportunity and assigning of value based on characteristics such as race, sex, gender, religion, age, national origin, medical condition, etc., which unfairly disadvantage individuals and communities while providing advantages to other individuals and communities, therefore preventing society as a whole from achieving its full potential; and

**WHEREAS**, numerous studies have shown that institutional and structural inequity is the root cause of health and economic disparities and social inequities that impact many aspects of life, including, but not limited to, housing, education, employment, public safety, criminal justice, and physical and behavioral health; and

**WHEREAS**, the County recognizes the disparities and systemic inequities that have disproportionately affected historically underserved and underrepresented groups within our community; and

**WHEREAS**. The County is committed to creating a more inclusive and equitable workplace and community where every individual is afforded equal opportunity to services and resources;

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Supervisors of the County of Mono affirms that racism, discrimination, and inequity in our society is a crisis that results in disparities in family stability, health and mental wellness, education, employment, economic development, public safety, criminal justice, and housing, among other things.

**BE IT FURTHER RESOLVED THAT** the Mono County Board of Supervisors finds that racism, discrimination and inequity have affected our entire society, and the County specifically, and the Board wishes to assess operations, services, policies and procedures to ensure that diversity, equity and inclusion (DEI) are core elements of the County; and

1 **BE IT FURTHER RESOLVED**, that:

2 § The County Administrative Officer is directed to develop a workplan that includes at a  
3 minimum, the following:

- 4 • A description of the County’s goals for diversity, equity and inclusion, both  
5 within the community and within the County’s operations; and
- 6 • Information regarding the creation of a DEI Work Team comprised of County  
7 employees to develop and implement DEI initiatives across all County  
8 Departments; and
- 9 • Plan for engagement with employees and outreach opportunities with community  
10 members to actively seek their input and insight to ensure a more inclusive work  
11 environment and equitable service delivery; and
- 12 • Identification of specific, measurable, achievable, relevant and time-bound  
13 measures which the County can undertake to further the identified diversity,  
14 equity and inclusion goals; and
- 15 • A description of the mechanisms, staffing, timing and other details required to  
16 carry out these measures and how adjustments will be made as needed; and
- 17 • A proposed budget for the work; and
- 18 • A communication plan for employees and the community to disseminate  
19 information on the County’s DEI goals and progress; and
- 20 • A timeline and schedule for tracking and reporting on the County’s progress  
21 toward its goals and commitments.

22  
23 § The County Administrative Officer is directed to report back to the Board with a draft of  
24 the above workplan by April 1, 2024.

25  
26 **PASSED, APPROVED and ADOPTED** this 9th day of January, 2024, by the following  
27 vote, to wit:

28 **AYES:**

29 **NOES:**

30 **ABSENT:**

31 **ABSTAIN:**

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\_\_\_\_\_  
John Peters, Chair  
Mono County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:

\_\_\_\_\_  
Clerk of the Board

\_\_\_\_\_  
County Counsel





**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE** January 16, 2024

**Departments: Clerk of the Board**

**TIME REQUIRED** 5 minutes

**PERSONS APPEARING BEFORE THE BOARD** Queenie Barnard, Clerk-Recorder-Registrar

**SUBJECT** Appointments of Supervisors to Boards, Commissions, and Committees for 2024

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

Mono County Supervisors serve on various boards, commissions, and committees for one-year terms that expired on December 31, 2023. Each January, the Board of Supervisors makes appointments for the upcoming year. The Board of Supervisors made appointments for 2024 at the January 9, 2024, meeting. However, due to Supervisor Peters' absence, this item is being brought forward again to make any additional changes.

**RECOMMENDED ACTION:**

Appoint Supervisors to boards, commissions, and committees for 2024.

**FISCAL IMPACT:**

None.

**CONTACT NAME:** Danielle Patrick

**PHONE/EMAIL:** 7609325535 / despinosa@mono.ca.gov

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|   |
|---|
| Click to download                                 |
| <a href="#">2024 Committee List</a>               |
| <a href="#">2024 Committee List by Supervisor</a> |
| <a href="#">2024 Volunteer Committee List</a>     |

**History**

Time

Who

Approval

|                  |                              |     |
|------------------|------------------------------|-----|
| 1/9/2024 3:36 PM | County Counsel               | Yes |
| 1/9/2024 1:25 PM | Finance                      | Yes |
| 1/9/2024 4:23 PM | County Administrative Office | Yes |

# **MONO COUNTY BOARD OF SUPERVISORS 2024 BOARD / COMMISSION / COMMITTEE MEMBERSHIP LIST**

Date of Appointment: January 9, 2024

Term Expires: December 31, 2024

## **AIRPORT LAND USE COMMISSION**

<https://monocounty.ca.gov/aluc>;

Wendy Sugimura, Mono County Community Development, [wsugimura@mono.ca.gov](mailto:wsugimura@mono.ca.gov), 760-924-1810

- ✚ John Peters, Supervisor
- ✚ Jennifer Kreitz, Supervisor
- ✚ Lynda Salcido, Supervisor Alternate

## **BEHAVIORAL HEALTH ADVISORY BOARD**

<https://monocounty.ca.gov/behavioral-health/page/advisory-board>;

Amanda Greenberg, Mono County Behavioral Health, [agreenberg@mono.ca.gov](mailto:agreenberg@mono.ca.gov), 760-924-1740

- ✚ Lynda Salcido, Supervisor
- ✚ Jennifer Kreitz, Supervisor Alternate

## **CALIFORNIA STATE ASSOCIATION OF COUNTIES (CSAC)**

[www.csac.counties.org](http://www.csac.counties.org);

Korina Jones, CSAC, [kjones@counties.org](mailto:kjones@counties.org), 916-327-7500

- ✚ John Peters, Supervisor
- ✚ Jennifer Kreitz, Supervisor Alternate

## **CENTRAL NEVADA REGIONAL WATER AUTHORITY (CNRWA)**

<https://cnrwa.com>;

Jeff Fontaine, Executive Director, [ccfontaine@gmail.com](mailto:ccfontaine@gmail.com), 775-443-7667

- ✚ John Peters, Supervisor

## **MONO COUNTY CHILDREN AND FAMILIES COMMISSION (FIRST 5)**

<https://www.first5mono.org>;

Molly DesBaillets, First 5, [mdesbaillets@monocoe.org](mailto:mdesbaillets@monocoe.org), 760-924-7626

- ✚ Bob Gardner, Supervisor

## **MONO COUNTY COLLABORATIVE PLANNING TEAM**

<https://monocounty.ca.gov/cpt>;

Heidi Willson, Mono County Community Development, [hwillson@mono.ca.gov](mailto:hwillson@mono.ca.gov), 760-924-1804

- ✚ Lynda Salcido, Supervisor
- ✚ Bob Gardner, Supervisor Alternate

## **COMMUNITY CORRECTIONS PARTNERSHIP**

<https://monocounty.ca.gov/probation/page/community-corrections-partnership-ccp>;

Jeff Mills, Mono County Probation Department, [jlmills@mono.ca.gov](mailto:jlmills@mono.ca.gov), 760-932-5570

- ✚ Jennifer Kreitz, Supervisor
- ✚ Rhonda Duggan, Supervisor Alternate

## **EASTERN SIERRA CHILD SUPPORT REGIONAL OVERSIGHT COMMITTEE**

<https://www.inyocounty.us/services/eastern-sierra-child-support-services>;

Amy Weurdig, Eastern Sierra Child Support Services [Weurdig.amy@inyo.cse.ca.gov](mailto:Weurdig.amy@inyo.cse.ca.gov), 866-901-3212

Samantha Rottner, Program Manager [Rottner.Samantha@inyo.cse.ca.gov](mailto:Rottner.Samantha@inyo.cse.ca.gov)

- ✚ Rhonda Duggan, Supervisor (Current Board Chair)

### **EASTERN SIERRA COMMUNITY HOUSING**

<http://eschousing.org/>

Patricia Robertson, Executive Director, [patricia@eschousing.org](mailto:patricia@eschousing.org), 760-934-4740

- ✚ Jennifer Kreitz, Supervisor
- ✚ Lynda Salcido, Supervisor Alternate

### **EASTERN SIERRA COUNCIL OF GOVERNMENTS**

<http://escog.ca.gov/>

Elaine Kabala, ESCOG Administrative Services Contractor, [ekabala@escog.ca.gov](mailto:ekabala@escog.ca.gov); 323-652-0390

- ✚ Lynda Salcido, Supervisor
- ✚ Bob Gardner, Supervisor
- ✚ Jennifer Kreitz, Supervisor Alternate
- ✚ John Peters, Supervisor Alternate

### **EASTERN SIERRA TRANSIT AUTHORITY (ESTA)**

<https://www.estransit.com/>

Phil Moores, Executive Director, [pmoores@estransit.com](mailto:pmoores@estransit.com), 760-872-1901

- ✚ Bob Gardner, Supervisor
- ✚ Rhonda Duggan, Supervisor (through 1/11/2024)
- ✚ Lynda Salcido, Supervisor (effective 1/12/2024)

### **GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT**

<https://www.gbuapcd.org/>

Tori DeHaven, Clerk of the Board, [tdehaven@gbuapcd.com](mailto:tdehaven@gbuapcd.com), 760-872-8211

- ✚ Rhonda Duggan, Supervisor
- ✚ Lynda Salcido, Supervisor
- ✚ Bob Gardner, Supervisor Alternate

### **INTER-AGENCY VISITORS' CENTER BOARD OF DIRECTORS**

Julie Hall, Mt. Whitney Ranger District [Julie.hall2@usda.gov](mailto:Julie.hall2@usda.gov) 760-876-6200

- ✚ Bob Gardner, Supervisor

### **JUVENILE JUSTICE COORDINATING COUNCIL**

Jeff Mills, Mono County Probation Department, [jmills@mono.ca.gov](mailto:jmills@mono.ca.gov), 760-932-5570

- ✚ Bob Gardner, Supervisor

### **MONO COUNTY LAW LIBRARY**

<https://www.monocolibraries.org/programs/law-library/>

Mono County Library / Law Library 760-934-8670, Mono County Counsel 760-924-1700

- ✚ Rhonda Duggan, Supervisor (Current Board Chair)

### **LOCAL AGENCY FORMATION COMMISSION (LAFCO)**

<https://monocounty.ca.gov/lafco/>

Wendy Sugimura, Mono County Community Development, [wsugimura@mono.ca.gov](mailto:wsugimura@mono.ca.gov), 760-924-1810

- ✚ Bob Gardner, Supervisor
- ✚ Jennifer Kreitz, Supervisor
- ✚ Rhonda Duggan, Supervisor Alternate

**MONO COUNTY LOCAL TRANSPORTATION COMMISSION (LTC)**

<https://monocounty.ca.gov/ltc;>

Heidi Willson, Mono County Community Development, [hwillson@mono.ca.gov](mailto:hwillson@mono.ca.gov), 760-924-1804

- ✚ John Peters, Supervisor
- ✚ Jennifer Kreitz, Supervisor
- ✚ Rhonda Duggan, Supervisor
- ✚ County Administrative Officer, Alternate

**MAMMOTH MOUNTAIN SKI AREA LIAISON COMMITTEE**

- ✚ Bob Gardner, Supervisor
- ✚ Lynda Salcido, Supervisor

**NATIONAL ASSOCIATION OF COUNTIES (NACo)**

[https://www.naco.org/;](https://www.naco.org/) [membership@naco.org](mailto:membership@naco.org), 888-407-6226

- ✚ John Peters, Supervisor
- ✚ Jennifer Kreitz, Supervisor Alternate

**RURAL COUNTY REPRESENTATIVES OF CALIFORNIA (RCRC) / GOLDEN STATE FINANCE AUTHORITY (GSFA) / GOLDEN STATE CONNECT AUTHORITY (GSCA) / ENVIRONMENTAL SERVICES JOINT POWER AUTHORITY (ESJPA)**

[http://www.rcrcnet.org/;](http://www.rcrcnet.org/)

Maggie Chui, RCRC, [MChui@rcrcnet.org](mailto:MChui@rcrcnet.org), 916-447-4806

- ✚ Rhonda Duggan, Supervisor
- ✚ Lynda Salcido, Supervisor Alternate
- ✚ Chad Senior, ESJPA Alternate

**SIERRA NEVADA CONSERVANCY**

<https://sierranevada.ca.gov>

Matt Driscoll, East Area Representative: Alpine, Inyo, Mono counties, [matt.driscoll@sierranevada.ca.gov](mailto:matt.driscoll@sierranevada.ca.gov), 760-636-8296

Tristyn Armstrong, Administrative Officer, [tristyn.armstrong@sierranevada.ca.gov](mailto:tristyn.armstrong@sierranevada.ca.gov), 530-823-4700

- ✚ Jennifer Kreitz, Supervisor
- ✚ John Peters, Supervisor Alternate

**TOWN-COUNTY LIAISON COMMITTEE**

<https://www.townofmammothlakes.ca.gov/593/Town-Council-Liaison-Committees;>

Angela Plaisted, [aplaisted@townofmammothlakes.ca.gov](mailto:aplaisted@townofmammothlakes.ca.gov), 760-965-3600

- ✚ Jennifer Kreitz, Supervisor
- ✚ Lynda Salcido, Supervisor
- ✚ County Administrative Officer
- ✚ Rhonda Duggan, Supervisor Alternate

**MONO COUNTY TREASURY OVERSIGHT COMMITTEE**

<https://monocounty.ca.gov/tax/page/treasury-oversight-committee;>

Mono County Treasurer – Tax Collector, [treasurer@mono.ca.gov](mailto:treasurer@mono.ca.gov), 760-932-5480

- ✚ Jennifer Kreitz, Supervisor
- ✚ Bob Gardner, Supervisor Alternate

**TRI-VALLEY GROUNDWATER MANAGEMENT DISTRICT**

<http://tvgmd.org/>;

Geri Bassett, Board Member/Secretary, [secretary@tvgmd.org](mailto:secretary@tvgmd.org)

✚ Rhonda Duggan, Supervisor (District 2)

**YOSEMITE AREA REGIONAL TRANSPORTATION SYSTEM JOINT POWERS AUTHORITY**

<https://yarts.com/>;

Jose Perez, Transit Administrative Assistant, [jose.perez@mcagov.org](mailto:jose.perez@mcagov.org), 209-723-3153 ext. 800

Tara Rodríguez, Staff Services Analyst I, [tara.rodriguez@mcagov.org](mailto:tara.rodriguez@mcagov.org), 209-723-3100 ext. 809

Lucia Huerta, Transit Administrative Assistant. [lucia.huerta@mcagov.org](mailto:lucia.huerta@mcagov.org) , 209-723-3100 ext. 500

✚ Bob Gardner, Supervisor

✚ Lynda Salcido, Supervisor

# **MONO COUNTY BOARD MEMBERS** **APPOINTED TO COMMISSIONS & COMMITTEES 2024**

## **JENNIFER KREITZ – SUPERVISOR DISTRICT #1**

Airport Land Use Commission  
Behavioral Health Advisory Board - Alternate  
California State Association of Counties (CSAC) – Alternate  
Community Corrections Partnership  
Eastern Sierra Community Housing  
Eastern Sierra Council of Governments – Alternate  
Local Agency Formation Commission (LAFCO)  
Local Transportation Commission, Mono County (LTC)  
National Association of Counties – Alternate  
Sierra Nevada Conservancy  
Town-County Liaison Committee  
Treasury Oversight Committee, Mono County

## **RHONDA DUGGAN – SUPERVISOR DISTRICT #2**

Community Corrections Partnership – Alternate  
Eastern Sierra Child Support Regional Oversight Committee  
Eastern Sierra Transit Authority (ESTA) (through 1/11/2024)  
Great Basin Unified Air Pollution Control District  
Law Library, Mono County  
Local Agency Formation Commission (LAFCO) - Alternate  
Local Transportation Commission, Mono County (LTC)  
Rural County Representatives of California (RCRC) / GSFA / GSCA / ESJPA  
Town-County Liaison Committee – Alternate  
Tri-Valley Groundwater Management District

## **BOB GARDNER – SUPERVISOR DISTRICT #3**

Children and Families Commission (First 5), Mono County  
Collaborative Planning Team, Mono County – Alternate  
Eastern Sierra Council of Governments  
Eastern Sierra Transit Authority (ESTA)  
Great Basin Unified Air Pollution Control District – Alternate  
Inter-Agency Visitor's Center Board of Directors  
Juvenile Justice Coordinating Council  
Local Agency Formation Commission (LAFCO)  
Mammoth Mountain Ski Area Liaison Committee  
Treasury Oversight Committee, Mono County – Alternate  
Yosemite Area Regional Transportation System Joint Powers Authority (YARTS)

## **JOHN PETERS – SUPERVISOR DISTRICT #4**

Airport Land Use Commission  
California State Association of Counties (CSAC)  
Central Nevada Regional Water Authority (CNRWA)  
Eastern Sierra Council of Governments – Alternate  
Local Transportation Commission, Mono County (LTC)  
National Association of Counties (NACo)  
Sierra Nevada Conservancy - Alternate

## **LYNDA SALCIDO – SUPERVISOR DISTRICT #5**

Airport Land Use Commission - Alternate  
Behavioral Health Advisory Board  
Collaborative Planning Team, Mono County  
Eastern Sierra Community Housing – Alternate  
Eastern Sierra Council of Governments  
Eastern Sierra Transit Authority (ESTA) (effective 1/12/2024)  
Great Basin Unified Air Pollution Control District  
Mammoth Mountain Ski Area Liaison Committee  
Rural County Representatives of California (RCRC) / GSFA / GSCA / ESJPA –  
Alternate  
Town-County Liaison Committee  
Yosemite Area Regional Transportation System Joint Powers Authority (YARTS)



**MONO COUNTY BOARD OF SUPERVISORS  
2024 BOARD / COMMISSION / COMMITTEE  
VOLUNTEER / UNOFFICIAL MEMBERSHIP LIST**

**CALIFORNIA COALITION FOR RURAL HOUSING**

<https://www.calruralhousing.org/>;

[info@calruralhousing.org](mailto:info@calruralhousing.org), 916-443-4448

 Jennifer Kreitz, Supervisor

**CONTINUUM OF CARE COUNCIL**

<https://www.easternsierracoc.org/>;

Inyo Mono Advocates for Community Action, Inc. (IMACA), [info@imaca.net](mailto:info@imaca.net), 760-873-8557


 Jennifer Kreitz, Supervisor

**EASTERN SIERRA AREA AGENCY ON AGING**

<https://www.inyocounty.us/services/health-human-services/aging-social-services/esaaa-advisory-council>

760-873-3305

 John Peters, Supervisor


 Rhonda Duggan, Supervisor

**EASTERN SIERRA SUSTAINABLE RECREATION PARTNERSHIP**

<https://www.essrp.org/>;

[info@essrp.org](mailto:info@essrp.org)


 Bob Gardner, Supervisor

 Lynda Salcido, Supervisor


**INYO MONO ADVOCATES FOR COMMUNITY ACTION (IMACA)**

<https://www.imaca.net/>;

Inyo Mono Advocates for Community Action, Inc. (IMACA), [info@imaca.net](mailto:info@imaca.net), 760-873-8557

 John Peters, Supervisor

 Jennifer Kreitz, Supervisor

 Vacant, Supervisor Alternate

**LOS ANGELES DEPARTMENT OF WATER AND POWER BOARD OF  
COMMISSIONS LIAISON**

<https://www.ladwpccommission.com/>

(213) 367-1356

 Bob Gardner, Supervisor



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

# REGULAR AGENDA REQUEST

Print

**MEETING DATE** January 16, 2024

**Departments: Elections**

**TIME REQUIRED** 15 minutes

**PERSONS APPEARING BEFORE THE BOARD** Queenie Barnard, Registrar of Voters

**SUBJECT** Election Education Series Part 2:  
Election Technology, Security, and  
Observers

### AGENDA DESCRIPTION:

(A brief general description of what the Board will hear, discuss, consider, or act upon)

In anticipation of the upcoming March 5, 2024, Presidential Primary Election, the Mono County Registrar will be presenting a four-part Election Education Series to the Board of Supervisors and public. Part 2 of the series will review Election Technology, Security, and Observers.

### RECOMMENDED ACTION:

None, informational only. Provide any desired direction to staff.

### FISCAL IMPACT:

None.

**CONTACT NAME:** Queenie Barnard

**PHONE/EMAIL:** 7609325534 / qbarnard@mono.ca.gov

### SEND COPIES TO:

### MINUTE ORDER REQUESTED:

YES  NO

### ATTACHMENTS:

|   |
|---|
| <p>Click to download</p> <p> <a href="#">Staff Report</a></p> |
|---|

### History

| Time             | Who            | Approval |
|------------------|----------------|----------|
| 1/9/2024 3:36 PM | County Counsel | Yes      |
| 1/3/2024 2:46 PM | Finance        | Yes      |

1/10/2024 8:20 AM

County Administrative Office

Yes



**CLERK – RECORDER – REGISTRAR  
CLERK OF THE BOARD OF SUPERVISORS  
COUNTY OF MONO**

P.O. BOX 237, BRIDGEPORT, CALIFORNIA 93517 • (760) 932-5530

[ClerkRecorder@mono.ca.gov](mailto:ClerkRecorder@mono.ca.gov) • [Elections@mono.ca.gov](mailto:Elections@mono.ca.gov) • [BOS@mono.ca.gov](mailto:BOS@mono.ca.gov)

January 16, 2023

**To:** Honorable Chair and Members of the Board of Supervisors

**From:** Queenie Barnard, Clerk-Recorder-Registrar

**Re:** Election Education Series Part 2

**Discussion:**

In anticipation of the upcoming March 5, 2024 Presidential Primary Election, the Elections Office will be presenting a four-part Election Education Series to the Board of Supervisors and public between January-February 2024.

|                                  |                   |  |
|----------------------------------|-------------------|--|
| Election Education Series Part 1 | January 9, 2024   | Voter Registration and Primary Election Voting                 |
| Election Education Series Part 2 | January 16, 2024  | Election Technology, Security, and Observers                   |
| Election Education Series Part 3 | February 6, 2024  | Voting In Person at a Poll Place vs Voting by Mail             |
| Election Education Series Part 4 | February 20, 2024 | Results, Canvass/Certification, Recounts, and Fraud Prevention |

Please contact me if you have any questions. Thank you.

Queenie Barnard  
Clerk-Recorder-Registrar  
760-932-5534  
[qbarnard@mono.ca.gov](mailto:qbarnard@mono.ca.gov)



**OFFICE OF THE CLERK  
OF THE BOARD OF SUPERVISORS**

**REGULAR AGENDA REQUEST**

Print

**MEETING DATE**     January 16, 2024

**TIME REQUIRED**

**SUBJECT**             Closed Session - Labor Negotiations

**PERSONS  
APPEARING  
BEFORE THE  
BOARD**

**AGENDA DESCRIPTION:**

(A brief general description of what the Board will hear, discuss, consider, or act upon)

CONFERENCE WITH LABOR NEGOTIATORS. Government Code Section 54957.6. Agency designated representative(s): Sandra Moberly, Mary Booher, Stacey Simon, Janet Dutcher, Jay Sloane, Christine Bouchard, and Oliver Yee. Employee Organization(s): Mono County Sheriff's Officers Association (aka Deputy Sheriff's Association), Local 39 - majority representative of Mono County Public Employees (MCPE) and Deputy Probation Officers Unit (DPOU), Mono County Paramedic Rescue Association (PARA), Mono County Correctional Deputy Sheriffs' Association. Unrepresented employees: All.

**RECOMMENDED ACTION:**

**FISCAL IMPACT:**

**CONTACT NAME:**

**PHONE/EMAIL:** /

**SEND COPIES TO:**

**MINUTE ORDER REQUESTED:**

YES  NO

**ATTACHMENTS:**

|                                   |
|-----------------------------------|
| <a href="#">Click to download</a> |
| No Attachments Available          |

**History**

| Time              | Who                          | Approval |
|-------------------|------------------------------|----------|
| 1/9/2024 4:03 PM  | County Counsel               | Yes      |
| 1/3/2024 2:45 PM  | Finance                      | Yes      |
| 1/10/2024 8:16 AM | County Administrative Office | Yes      |



