

MONO COUNTY PLANNING COMMISSION

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

SPECIAL MEETING AGENDA

October 3, 2022 – 9:05 a.m.

Hybrid Meeting: Zoom & Mono Lake Room
Mono Lake Room-Mono County Civic Center
1290 Tavern Rd
Mammoth Lakes, CA

This meeting will be held in person and via teleconferencing, and members of the Commission may attend from separate, remote locations. As authorized by AB 361, dated September 16, 2021, a local agency may use teleconferencing without complying with the teleconferencing requirements imposed by the Ralph M. Brown Act when a legislative body of a local agency holds a meeting during a declared state of emergency and local officials have recommended or imposed measures to promote social distancing.

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

TELECONFERENCE INFORMATION

1. Joining via Zoom

You may participate in 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/87177061635>

Or visit <https://www.zoom.us/> and click on “Join A Meeting.” Use Zoom Meeting ID: 871 7706 1635
To provide public comment (at appropriate times) during the meeting, press the “Raise Hand” hand button on your screen and wait to be acknowledged by the Chair or staff. Please keep all comments to 3 minutes.

To join the meeting by telephone

Dial (669) 900-6833, then enter Webinar ID: 871 7706 1635

To provide public comment (at appropriate times) during the meeting, press *9 to raise your hand and wait to be acknowledged by the Chair or staff. Please keep all comments to 3 minutes.

2. Viewing the Live Stream

You may also view the live stream of the meeting without the ability to comment **by visiting:**

http://monocounty.granicus.com/MediaPlayer.php?publish_id=bc8be8f3-16a6-4a8a-89a6-07bc9e9a4885

DISTRICT #1
COMMISSIONER
Patricia Robertson

DISTRICT #2
COMMISSIONER
Roberta Lagomarsini

DISTRICT #3
COMMISSIONER
Jora Fogg

DISTRICT #4
COMMISSIONER
Scott Bush

DISTRICT #5
COMMISSIONER
Chris I. Lizza

*Agenda sequence (see note following agenda).

1. CALL TO ORDER & PLEDGE OF ALLEGIANCE

2. PUBLIC COMMENT: Opportunity to address the Planning Commission on items not on the agenda

3. MEETING MINUTES

A. Review and adopt minutes of August 18, 2022, AB361 meeting. (pg. 1)

B. Review and adopt minutes of August 18, 2022, Special Meeting. (pg. 2)

4. PUBLIC HEARING

A. 9:05 am. GENERAL PLAN AMENDMENT AND SPECIFIC PLAN/Apogee Farm. Consider a recommendation to the Board of Supervisors to approve General Plan Amendment 22-01 redesignating two properties south of Benton (APN 025-020-013 and 025-040-002) from Rural Residential-40 to Specific Plan, and to approve the Apogee Farm Specific Plan which includes a Conditional Use Permit for cannabis activities and overhead power. The Specific Plan would authorize commercial cannabis cultivation (outdoors and indoors), processing, and distribution. Cultivation will be less than 10,000 square-feet and begin outdoors before being phased indoors into three greenhouses and will not be open to the public. Certification of a Mitigated Negative Declaration, including adoption of a Mitigation Monitoring and Reporting Plan, under the California Environmental Quality Act (CEQA) is recommended. *Staff: Michael Draper (pg. 4)*

B. 9:45 am. USE PERMIT/Schott and Reedy. Consider approval of a use permit allowing placement of three overhead power-poles in the County right-of-way along Crowley Lake Drive in Crowley Lake. The utility line will be undergrounded in an existing easement from Crowley Lake Drive to a residential structure located at 3858 Crowley Lake Drive (APN 060-150-004). The parcel is approximately 1.04-acres in size, is designated Single-Family Residential (SFR), and contains a residence and shed. A California Environmental Quality Act (CEQA) exemption is proposed. *Staff: Michael Draper & Laura Stark (pg. 529)*

5. WORKSHOP

No items

6. REPORTS

A. Director (pg. 593)

B. Commissioners

7. INFORMATIONAL

8. ADJOURN to November 17, 2022

NOTE: Although the Planning Commission generally strives to follow the agenda sequence, it reserves the right to take any agenda item – other than a noticed public hearing – in any order, and at any time after its meeting starts. The Planning Commission encourages public attendance and participation.

In compliance with the Americans with Disabilities Act, anyone who needs special assistance to attend this meeting can contact the Commission secretary at 760-924-1804 within 48 hours prior to the meeting to ensure accessibility (see 42 USCS 12132, 28CFR 35.130).

*The public may participate in the meeting at the teleconference site, where attendees may address the Commission directly. Please be advised that Mono County does its best to ensure the reliability of videoconferencing but cannot guarantee that the system always works. If an agenda item is important to you, you might consider attending the meeting in Bridgeport.

Full agenda packets, plus associated materials distributed less than 72 hours prior to the meeting, will be available for public review at the Community Development offices in Bridgeport (Annex 1, 74 N. School St.) or Mammoth Lakes (Minaret Village Mall, above Giovanni's restaurant). Agenda packets are also posted online at www.monocounty.ca.gov / departments / community development / commissions & committees / planning commission. For inclusion on the e-mail distribution list, send request to hwillson@mono.ca.gov.

Commissioners may participate from a teleconference location. Interested persons may appear before the Commission to present testimony for public hearings, or prior to or at the hearing file written correspondence with the Commission secretary. Future court challenges to these items may be limited to those issues raised at the public hearing or provided in writing to the Mono County Planning Commission prior to or at the public hearing. Project proponents, agents or citizens who wish to speak are asked to be acknowledged by the Chair, print their names on the sign-in sheet, and address the Commission from the podium.

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Draft Minutes

August 18, 2022 – 9:00 a.m.

COMMISSIONER: Chris Lizza, Roberta Lagomarsini, Jora Fogg, Scott Bush, Patricia Robertson

STAFF: Wendy Sugimura, director; Heidi Willson, planning commission clerk; Bentley Regehr, planning analyst; April Sall, planning analyst; Erik Ramakrishnan, Counsel

PUBLIC:

1. CALL TO ORDER

Meeting called to order at 9:00 am and the Commission led the pledge of allegiance.

2. PUBLIC COMMENT: Opportunity to address the Planning Commission on items not on the agenda. Please refer to the Teleconference information section to determine how to make public comment for this meeting.

- No public comment.

3. CONSIDER ADOPTION OF RESOLUTION 22-08 AB 361 TO CONTINUE DIGITAL MEETINGS

Motion: Adopt resolution AB 361.

Bush motion; Fogg second.

Roll-call vote – Ayes: Lizza, Fogg, Bush, Lagomarsini, Robertson.

Motion passed 5-0.

4. ADJOURN at 9:06 to August 18, 2022.

DISTRICT #1
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Patricia Robertson

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Draft Minutes

August 18, 2022 – 9:05 a.m.

COMMISSIONER: Chris Lizza, Roberta Lagomarsini, Jora Fogg, Scott Bush, Patricia Robertson

STAFF: Wendy Sugimura, director; Heidi Willson, planning commission clerk; Bentley Regehr, planning analyst; April Sall, planning analyst; Erik Ramakrishnan, Counsel, Emily Fox, Counsel, Louis Molina, Environmental Health

PUBLIC: Jeff Hunewill, John Lum, Laura, Lisa Cutting, Louis Molina, Margy Verba, Mike Light, Paul Ashby, Ruth Garland, Sarajadams, Winter King, Annie Moore, Bartshe Miller, Duncan, Elin Ljung, Geoff, Grace Anderson, Jake Suppa, 405-613-8180, 714-345-8652, 760-616-4584

1. CALL TO ORDER & PLEDGE OF ALLEGIANCE

- Meeting called to order at 9:06 am and the Commission led the pledge of allegiance.

2. PUBLIC COMMENT: Opportunity to address the Planning Commission on items not on the agenda

- No public comment

3. MEETING MINUTES

A. Review and adopt minutes of June 16, 2022

Motion: Approve the minutes from meeting on June 16, 2022.

Bush motion; Lagomarsini second.

Roll-call vote – Ayes: Lizza, Fogg, Bush, Lagomarsini, Robertson.

Motion passed 5-0.

4. PUBLIC HEARING

A. GENERAL PLAN AMENDMENT 22-01 AND MONO BASIN HIP CAMP SPECIFIC PLAN WITH CEQA 15183 CHECKLIST/Swiggum. Consider adopting Resolution R22-09 making the required findings and recommending to the Mono County Board of Supervisors approval of General Plan Amendment 22-01 and the Mono Basin Hip Camp Specific Plan, including finding that the project qualifies as a Statutory Exemption under CEQA Guidelines 15183. General Plan Amendment 22-01 proposes to change the land use designation from Rural Residential (RR) to Specific Plan (SP) at 228 Cottonwood Canyon Road off State Route (SR) 167 in the Mono Basin (APN 013-210-026). The Mono Basin Hip Camp Specific Plan sets forth development standards for three camping areas with a combination of platforms for tents, fire rings, and RVs, and two cabins/bunkhouses. Each site will have vault toilets and other support infrastructure. A residential unit with accessory structures and utility infrastructure is also included. *Staff: Bentley Regehr*

Staff recommended continuation of the Public Hearing to a future meeting to adequately evaluate and respond to public comment.

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Chris I. Lizza

Public Hearing Open at 9:16 am.

Public comment that was made in opposition by the following public members- Kathi Richards, John Lum, Ruth Garland, Grace Anderson, Margy Verba, Mike Light, Paul Ashby. Concerns raised during the public comment were in relation to the development of the parcel, fire safety, zoning changes, housing shortage, public safety, and noise.

Public Hearing Closed at 9:46 am.

Motion- To continue the public hearing to an uncertain time in the future.

Lagomarsini motion; Fogg seconded.

Roll-call vote – Ayes: Lizza, Fogg, Bush, Lagomarsini, Robertson.

Motion passed 5-0.

5. WORKSHOP

No Items

6. REPORTS

A. Director

Sugimura gave an update on current and upcoming projects.

B. Commissioners

Commissioner Lizza spoke about past and future Planning Commission training opportunities.

7. INFORMATIONAL

No items

8. ADJOURN to September 15, 2022, at 10:15am

Mono County Community Development Department

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Planning Division

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October 3, 2022

To: The Mono County Planning Commission

From: Michael Draper, Planning Analyst

Re: General Plan Amendment for a proposed change of Land Use Designation from Rural Residential to Specific Plan, and proposed Specific Plan.

RECOMMENDATION

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, make the following findings:
 - a. That the General Plan Amendment is consistent with the General Plan as well as all applicable area plans; and
 - b. That the proposed Apogee Farm Specific Plan is consistent with the General Plan as well as all applicable area plans; and
3. Adopt Resolution R22-__ recommending the Board of Supervisors adopt GPA 22-01 and the Apogee Farm Specific Plan, which also includes a Use Permit for commercial cannabis and overhead power, and certification of the Mitigated Negative Declaration (MND) and adoption of the Mitigation Monitoring and Reporting Plan (MMRP).

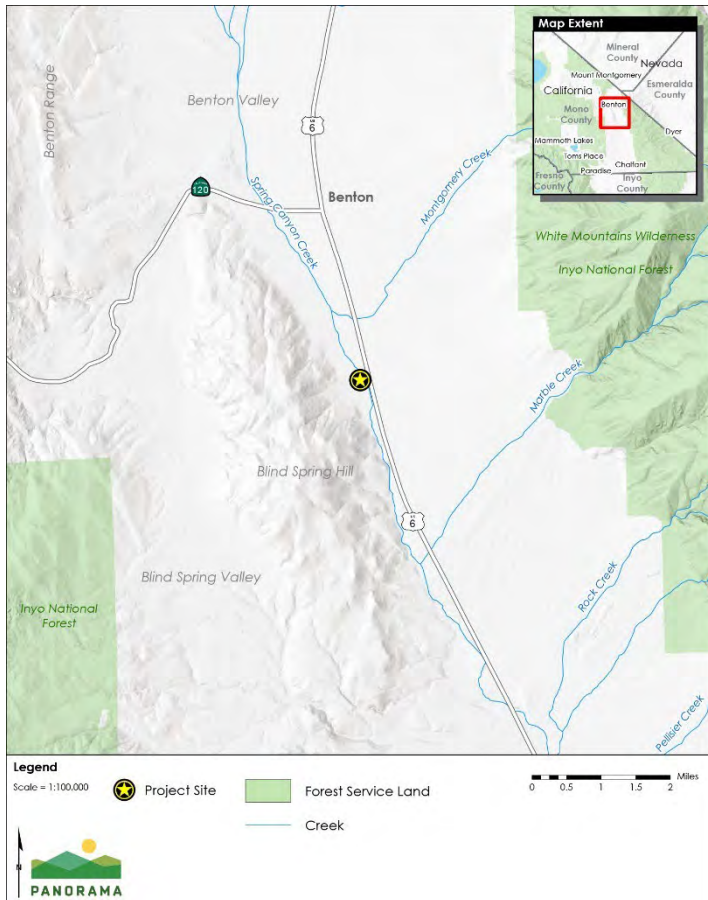
FISCAL IMPACT

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.

BACKGROUND

The applicant is requesting a change to the land use designation (LUD) for two adjacent properties located south of Benton along US Highway 6 (US 6), APN 025-020-013 (40-acres) and 025-040-002 (37.9-acres) 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

Figure 1. Project location



Apogee Farm Specific Plan, consistent with California Government Code section 65450-65457, Mono County Code Title 19, and Mono County General Plan (MCGP) Land Use Element (LUE) Chapter 36, *Specific Plans*. 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 a Conditional Use Permit for commercial cannabis activity and 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. 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.

Surrounding Land Use Designations

The land use designations adjacent to the two parcels are described below and in Figure 2:

East:	Private land – Agriculture (AG) Private land – Rural Residential (RR)
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West:	Private land – Industrial (I) Bureau of Land Management – Resource Management (RM)
South:	Private land – Rural Residential (RR)
North:	Private land – Agriculture (AG)

The project site is adjacent to US 6 south of Benton, in an area of low-density properties designated to be a minimum of 40-acres. To the north, northeast, and partial east side of the project site is a single, 466-acre property designed 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 residential unit 0.3-miles from the project site. The nearest neighbor is located on this parcel, and the applicant intends to buffer this neighbor from the cannabis operation by 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 provide by a recorded easement through the project site.

Figure 2. 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 has the 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.

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 3.

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 General Plan Chapter 22 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 to minimize aesthetics impacts and would be approved by the Mono County Planning Division.

Figure 3. Project Site

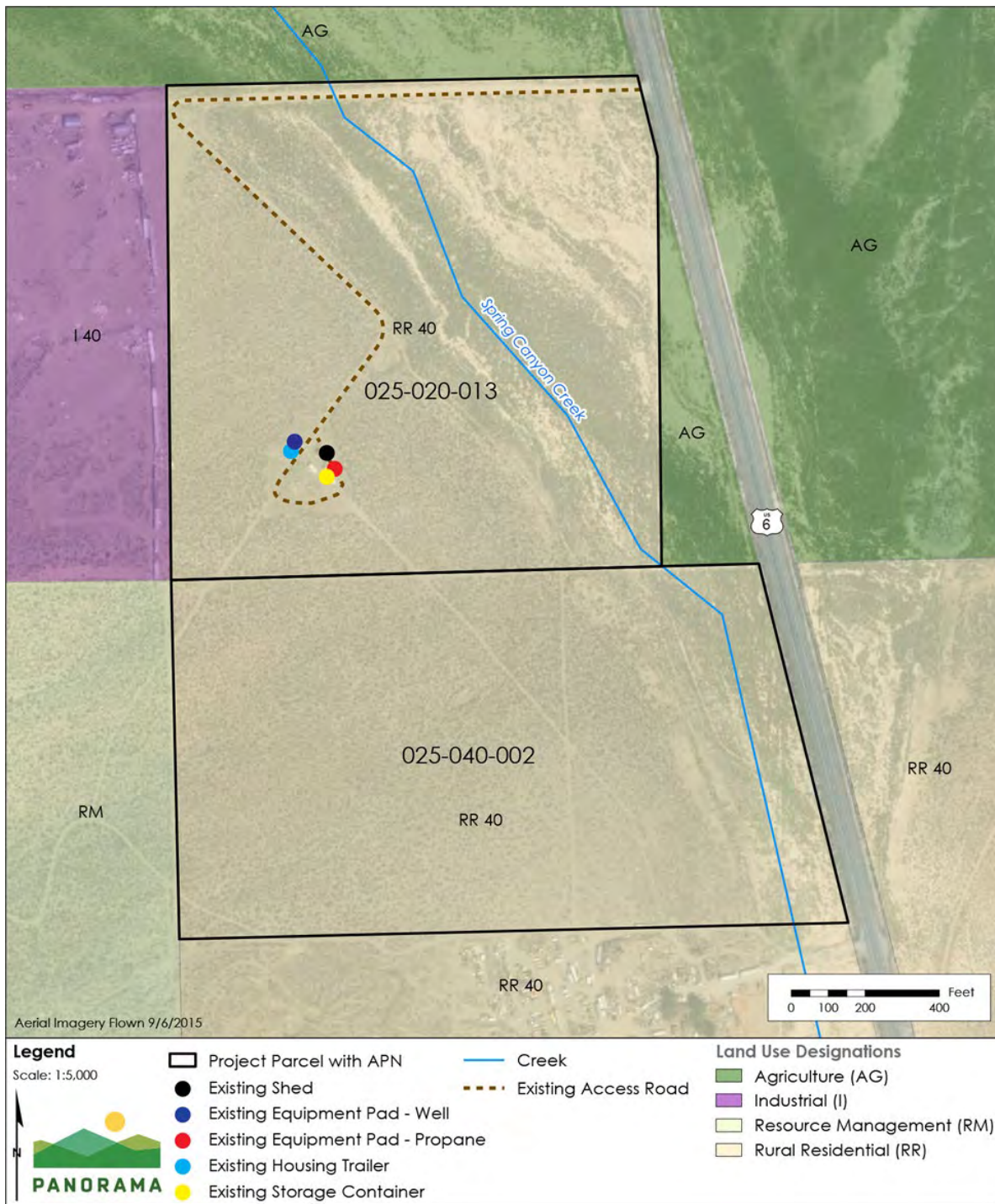


Table 2. Existing and Proposed Land Use Designations

Uses and Development Standards	Rural Residential (RR-40)– Existing Land Use	Specific Plan– Proposed Land Use
Permitted Uses	<ul style="list-style-type: none"> • Single-family dwelling • Small-scale agriculture • Accessory buildings and uses • Animals and pets 	<ul style="list-style-type: none"> • Single-family dwelling • Animals and pets consistent with RR lud allowances (see

Uses and Development Standards	Rural Residential (RR-40)– Existing Land Use	Specific Plan– Proposed Land Use
	<ul style="list-style-type: none"> • Home occupations • Manufactured home used as single-family dwelling • Accessory Dwelling Unit (ADU) or Junior Accessory Dwelling Unit (JADU) • Transitional and Supportive Housing • Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act 	<p>Animal Standards Section 04.270).</p> <ul style="list-style-type: none"> • Manufactured home used as a single-family dwelling^a • Accessory Dwelling Unit (as prescribed in Chapter 16 – Accessory Dwelling Units) • Accessory buildings^b and uses • Farm labor housing • 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 Director’s Review	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Minor alteration involving no expansions of square footage or intensification of uses and exempt from CEQA
Uses Subject to a Use Permit	<ul style="list-style-type: none"> • Recreational amenities (e.g., art galleries, country clubs, golf courses) • Kennel • Construction of an accessory building prior to construction of the main building • Mobile home parks • Small-scale agriculture, including limited commercial agricultural activities • Manufactured housing subdivision • 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. 	<ul style="list-style-type: none"> • Any uses other than a permitted use requires an amendment to this Specific Plan
Animals and Pets	<ul style="list-style-type: none"> • Minimum Lot Area Required: 10,000 square feet • Animal Units^c Permitted: <ul style="list-style-type: none"> – Less than 1 acre: one unit per 10,000 square feet of lot area with Director Review with notice – 1 to 10 acres: one unit per 10,000 square feet of lot area – More than 10 acres: no limit 	<ul style="list-style-type: none"> • Animal Units permitted by General Plan Section 04.270:

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

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.

COMPLIANCE WITH MONO COUNTY CANNABIS REGULATIONS (MCGP LUE, 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 childcare 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 Specific Plan requires a minimum setback of 50' in the front, and 30' on the side and rear. 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 MND. 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 within 72 hours if concerns are raised to him. The County has the ability to require modifications to the odor mitigation plan if odors cause a 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.

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 is 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. 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 law 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 MCGP, Ch. 22, 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 04.120.

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 Specific Plan. Outdoor cultivation shall be setback 370' from western property boundary shared with a 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 over 950' south of the existing access easement this property shares with the western neighbor. 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.

FINDINGS

Resolution 22-__ (Attachment E) contains the required findings and responses for approving the General Plan Amendment and Specific Plan. Additionally, findings for the Commercial Cannabis Activity Use Permit and overhead powerline are included. Findings for CEQA certification are included in the Resolution by reference to the Mitigated Negative Declaration.

ENVIRONMENTAL REVIEW, CALIFORNIA ENVIRONMENTAL QUALITY ACT

An Initial Study/Mitigated Negative Declaration has been completed for the project including a Mitigation Monitoring and Reporting Plan. The Initial Study concluded that the Project would potentially affect the following environmental factors: Aesthetics, Air Quality, Biological Resources, Cultural Resources, and Tribal Cultural Resources. The County has incorporated mitigation measures into the project to reduce potential impacts to less than significant. See Attachment B, Apogee Farms' Initial Study/Mitigated Negative Declaration, and Attachment C, Mitigation Monitoring and Reporting Plan.

A Notice of Preparation (NOP) was prepared for the project and issued on May 15, 2021. The NOP was also provided to local regulatory agencies and tribes. On March 3, 2022, a notice was provided in compliance with AB 52 requirements to requesting tribes, again offering an opportunity for consultation on the project.

A public scoping meeting took place on June 1, 2021, from 4:30 pm – 6:00 pm. Due to concerns of COVID-19, the meeting was held digitally and all members of the public were welcome to attend. Notice for the meeting was published in the Sheet Newspaper and by email to the Tri-Valley Groundwater Management District and Tri-Valley Regional Planning Advisory Committee listserv.

The Draft IS/MND was published for a 30-day public review period from July 15 through August 15, 2022. A Notice of Intent to Adopt was published in The Sheet Newspaper on July 16, 2022, and notice was mailed to property owners within 300' of the project on July 15, 2022. A Notice of Completion and Environmental Document Transmittal was posted on the California Governor's Office of Planning and Research, CEQA webpage on July 15, 2022.

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.

Notice of this project to tribes compliant with Senate Bill 18, allowing a 90-day period for consultation, was mailed on May 26, 2021 and no response was provided.

On September 21, twelve days prior to the public hearing on this project, mailed notice was provided to surrounding property owners with 300' of the property boundaries, and a notice was published in The Mammoth Times on September 22, 2022.

PUBLIC COMMENT

Comments received on the Draft IS/MND are included in the Final IS/MND. 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.

ATTACHMENT

1. Apogee Farms Specific Plan
2. Initial Study/Mitigated Negative Declaration (redline format) including the Mitigation Monitoring and Reporting Plan
3. Resolution R22-__

Attachment #1

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. 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

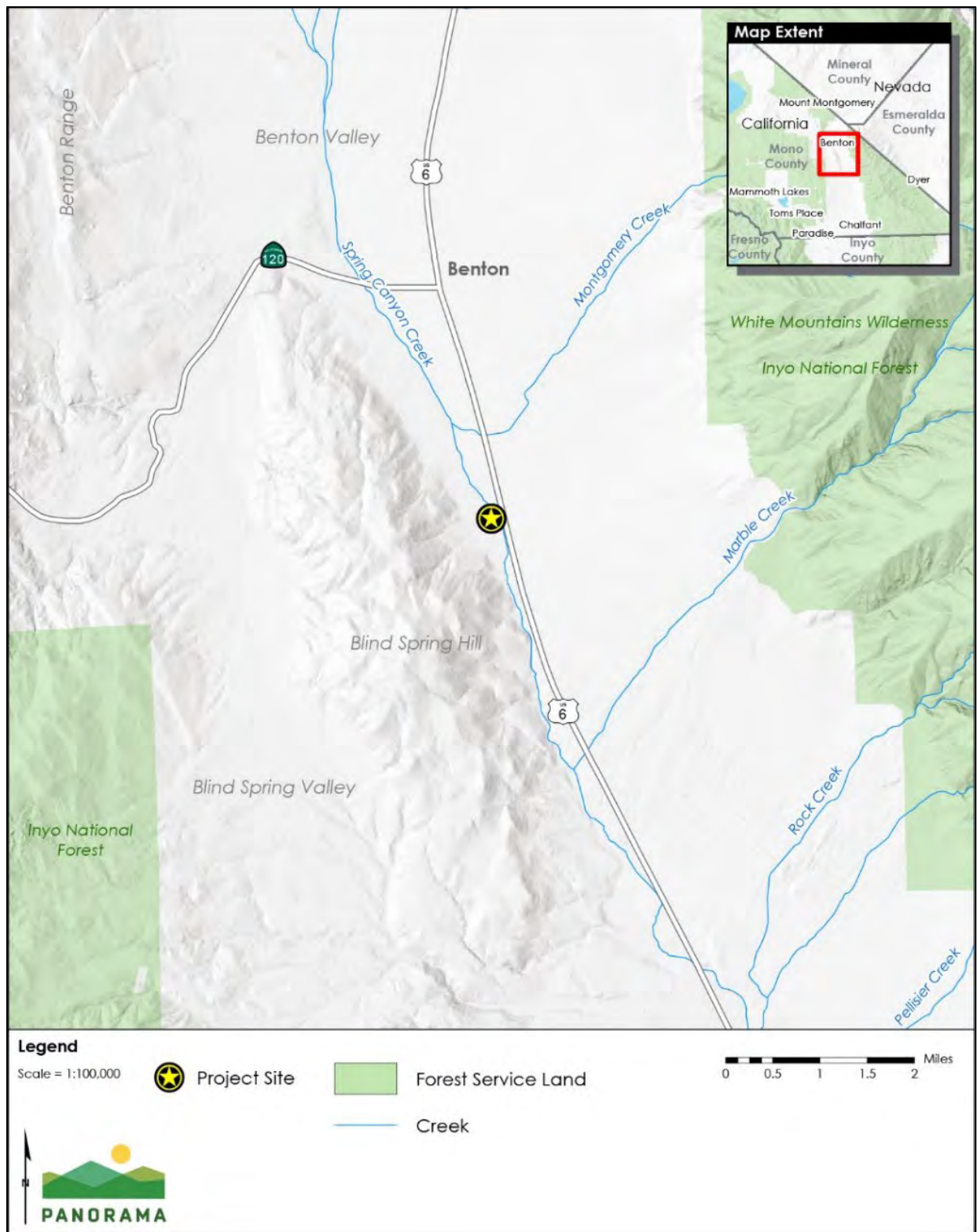
The Apogee Farms Specific Plan site is located in southeastern Mono County, California, as shown in Figure 1 below. The rural community of Benton is 2.5 miles to the north, and the city of Bishop is 32 miles south of the project site. The project site encompasses one 40.4-acre parcel (APN 025-020-013) 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

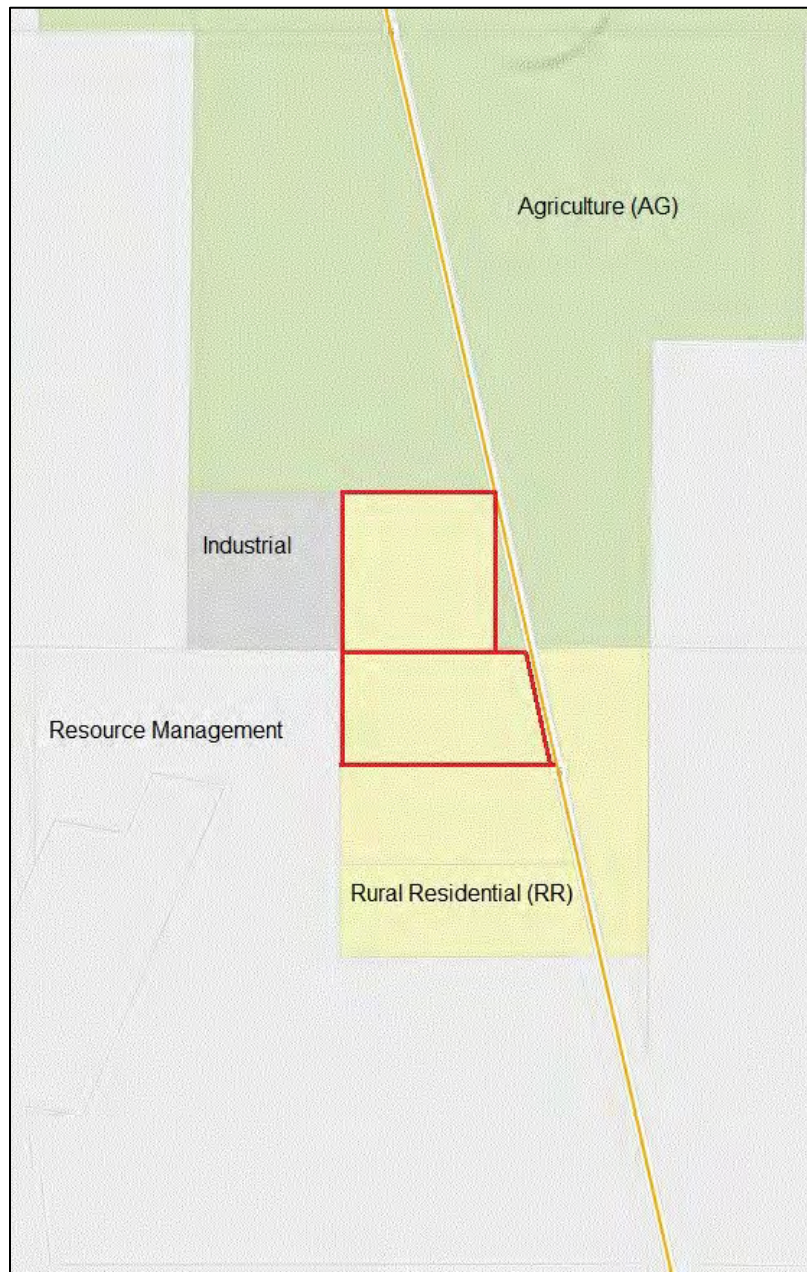
Latitude, Longitude : 37.784047, -118.468509

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

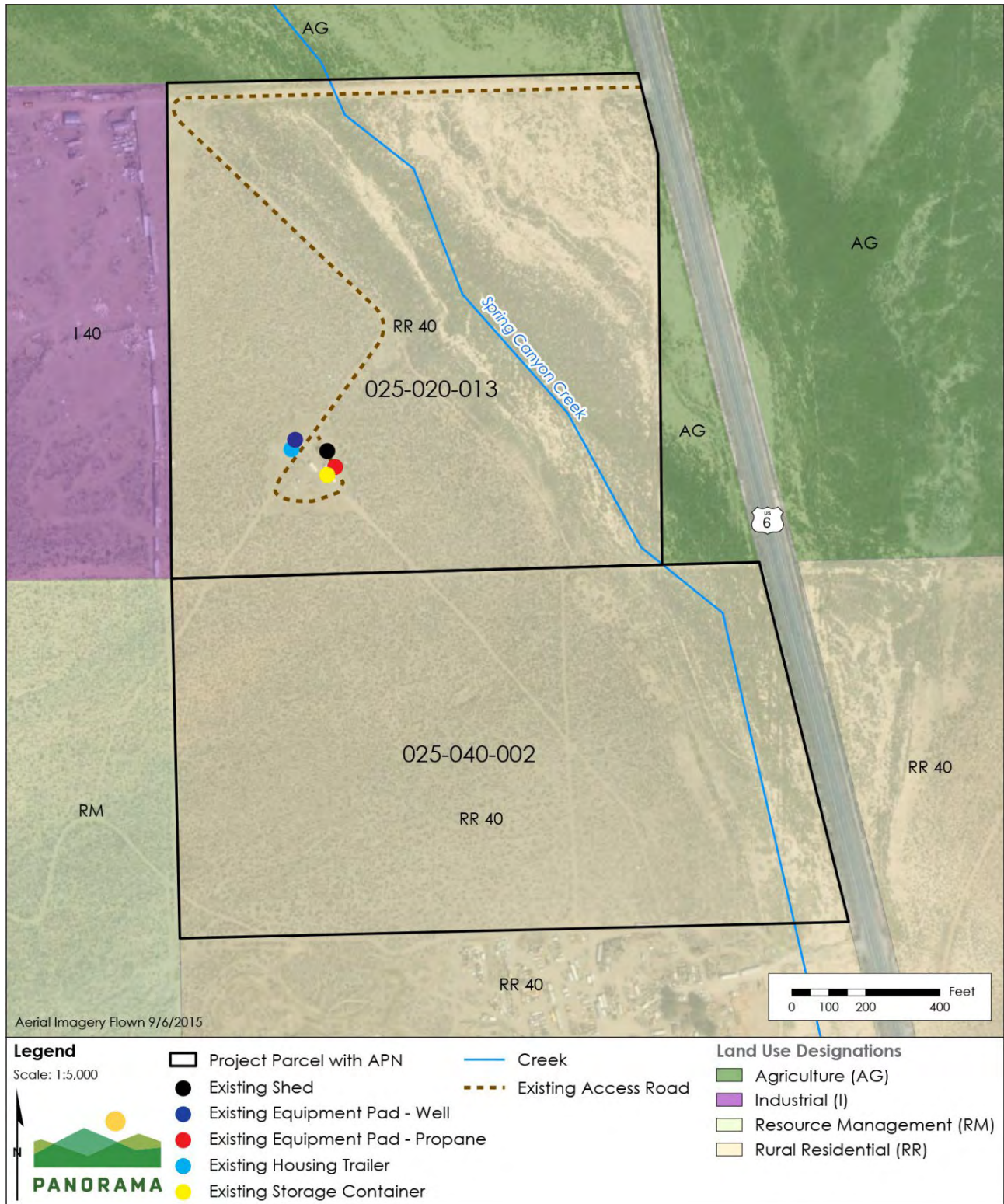
Facility Components	Footprint (square feet)	Dimensions
Existing		
Dirt Access Roads and Turnaround	36,604	10 feet x 2,982 feet 8 feet x 598 feet
Equipment Pads (Well and Propane Tank)	Well: 15.7 ^a Propane Tank: 5.7 ^a	--
Shed	194.6	--

Facility Components	Footprint (square feet)	Dimensions
Storage Container	320	8 feet x 40 feet
Housing Trailer	96	8 feet x 12 feet

Notes:

^a 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

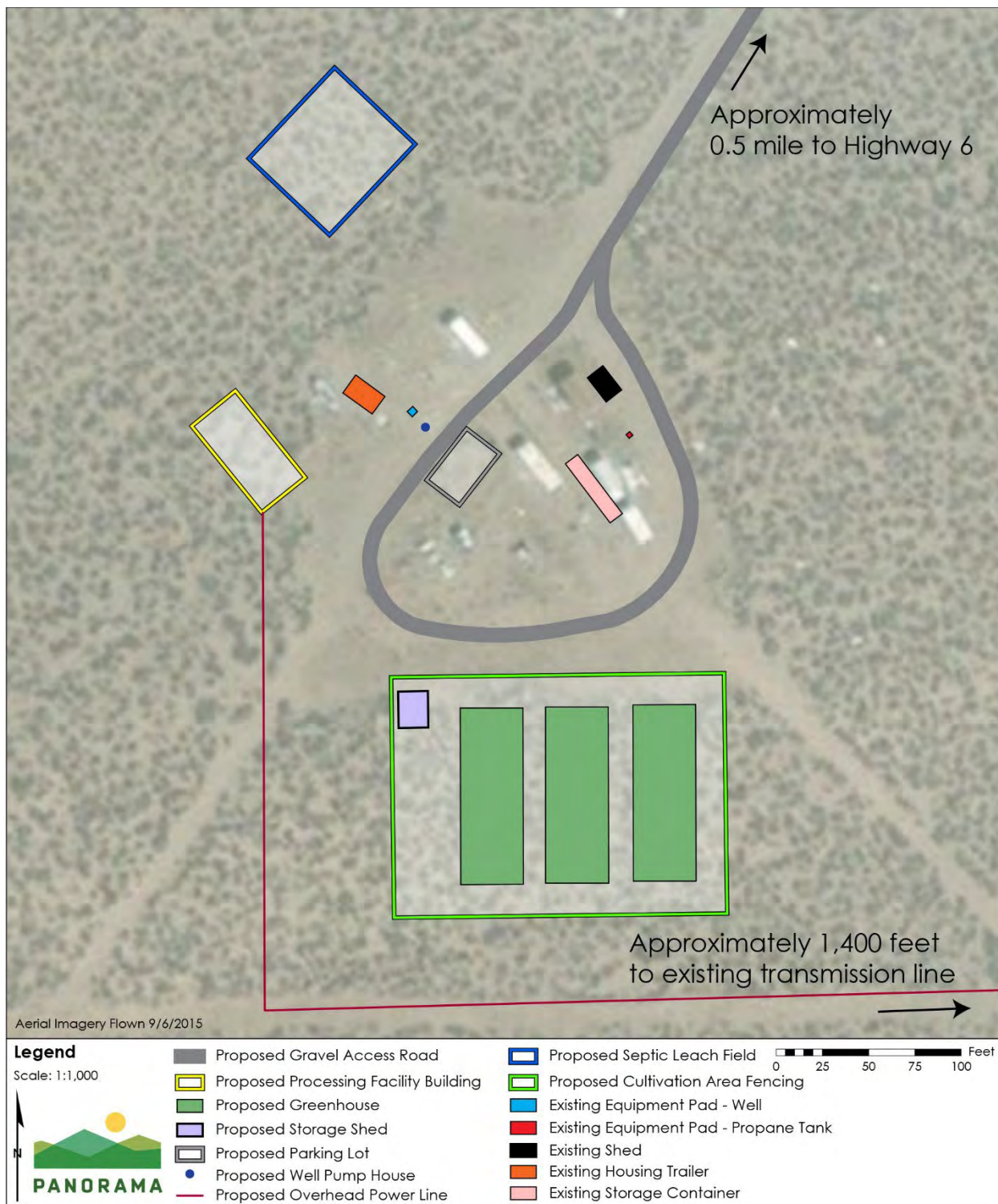
The project components and footprint of each component for full project buildout are summarized in Table 3 below. Existing equipment pads and access roads also are identified. The project will include a processing and distribution facility (referred to as the “processing facility”) for commercial cannabis 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
Existing		
Dirt Access Roads and Turnaround	36,604	10 feet x 2,982 feet 8 feet x 598 feet
Equipment Pads (Well and Propane Tank)	Well: 15.7 ^a Propane Tank: 5.7 ^a	--
Shed	195	--
Storage Container	320	8 feet x 40 feet
Trailer	96	8 feet x 12 feet
Proposed		
Graveling of Existing Access Roads and Turnaround ^b	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 1 handicap-accessible space: 15 feet x 20 feet
Septic System (1,000-gallon tank) (standard sizing for a three-bedroom residence)	3,920 ^a	Leach line ^c : 120 linear feet or two leach lines: 60 linear feet
Notes:		
^a Estimated based on site plans.		
^b 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.		
^c 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 vegging¹ 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.

¹ 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).

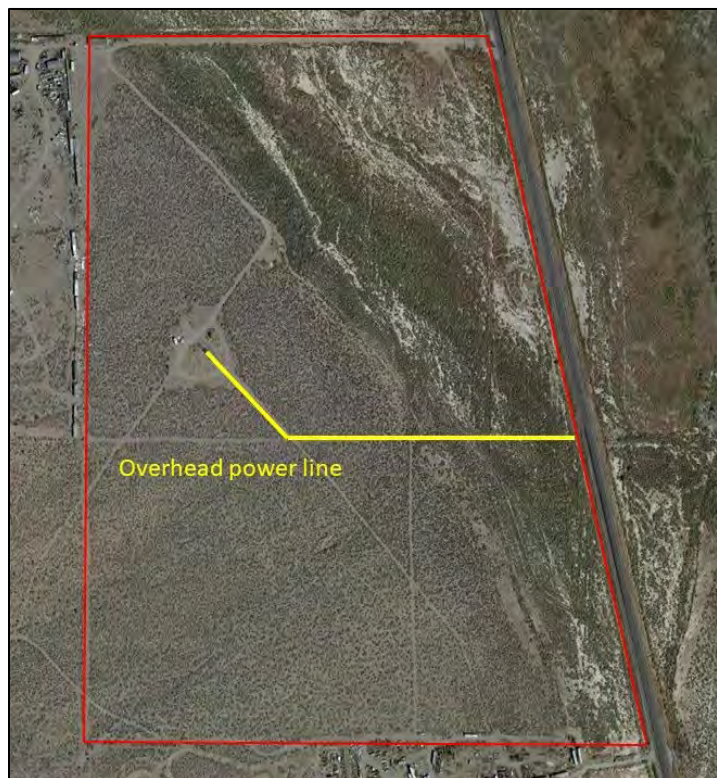
Groundwater use is subject to the jurisdiction of the Tri-Valley Groundwater Management District (TVGMD).

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.

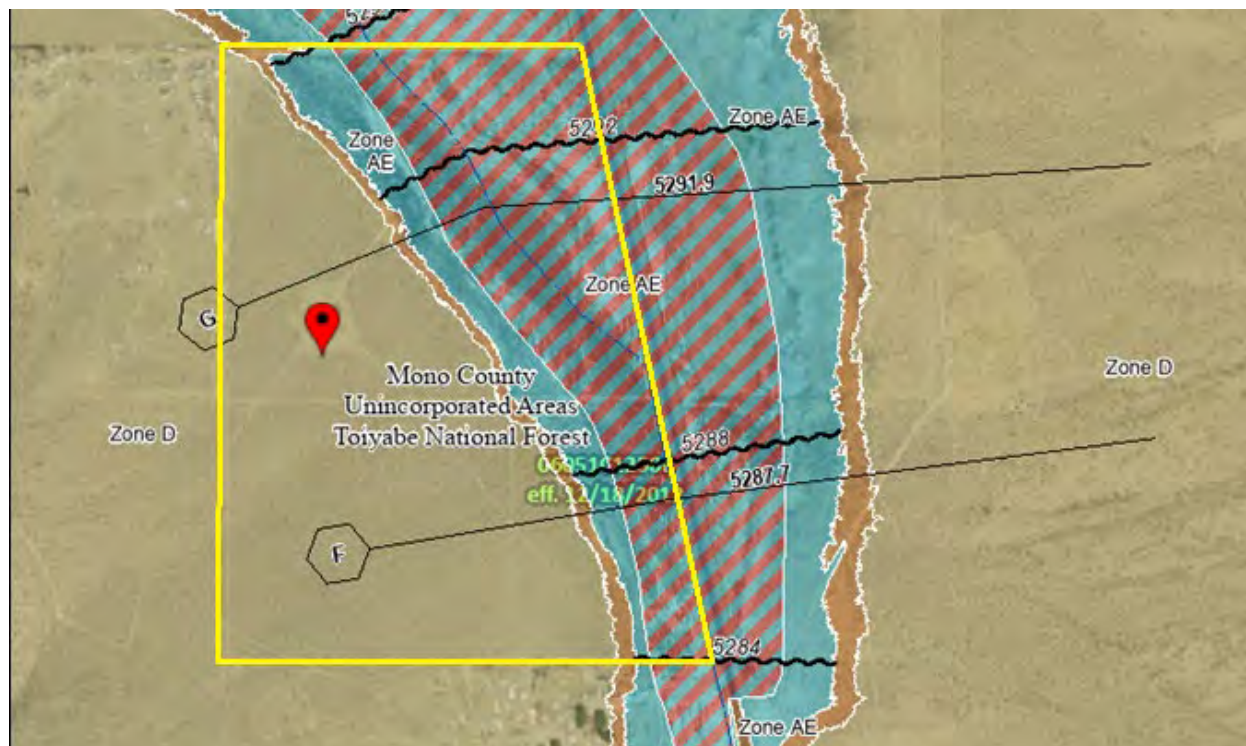
2. Floodplain

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 (CNDDDB), 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.

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. Existing unpermitted uses on the project shall be permitted in compliance with the Mono County General Plan and Mono County Code.
2. 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. All development shall meet requirements of the Mono County General Plan, Mono County Code, and project conditions.
4. Project shall comply with Chapter 13, Cannabis Regulations.
5. 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. The project shall be in substantial compliance with the project description and the site plan of the staff report and Mitigated Negative Declaration.
7. Applicant must maintain active business license and tax certificate requirements.
8. 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. Project shall comply with all Mono County Building Division, Public Works, and Environmental Health requirements.
10. 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. 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. 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

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 ₁₀	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

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
Public Comment email address: 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

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2 PROJECT DESCRIPTION

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-40¹) 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.

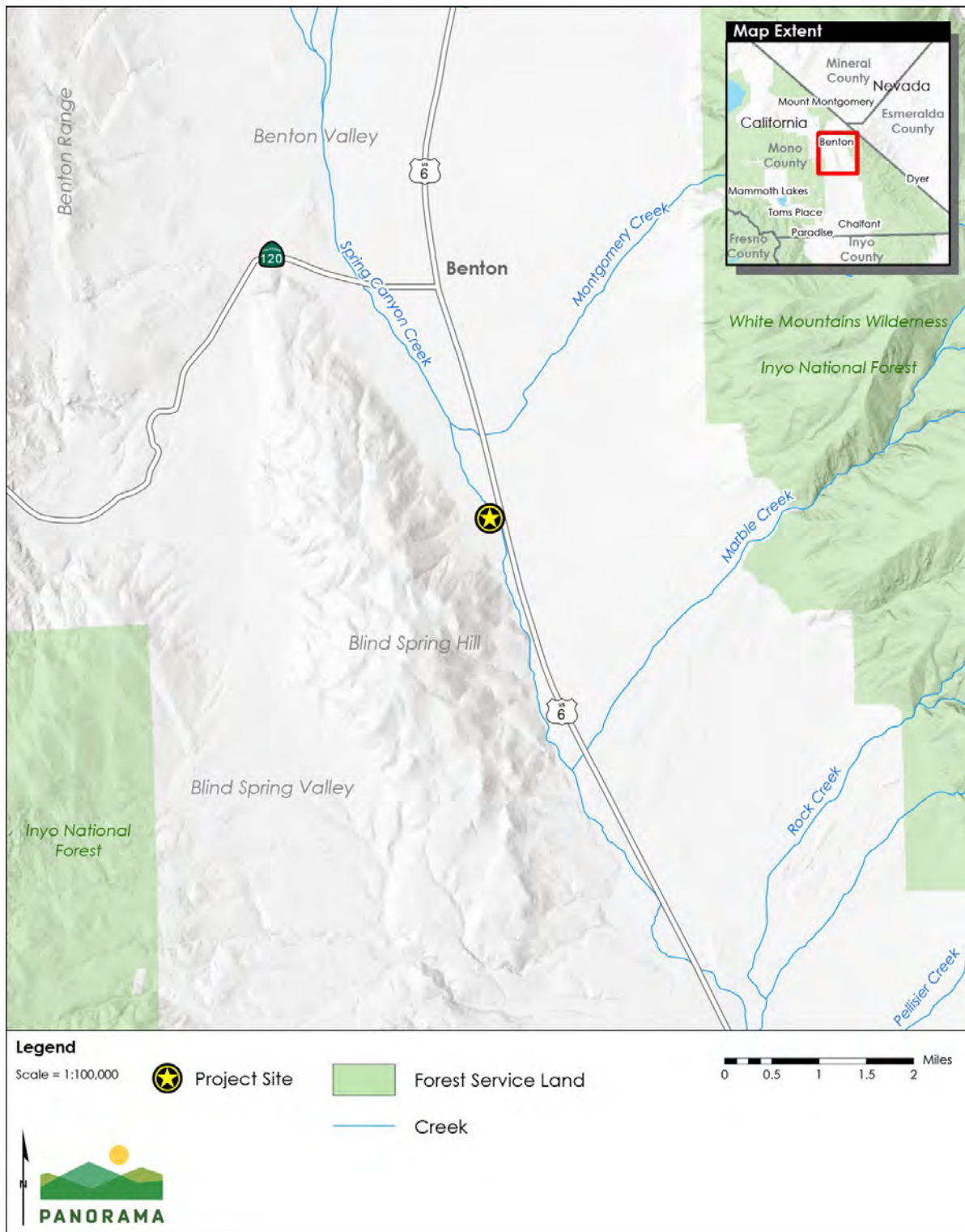
2.3 Access

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.

¹ 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

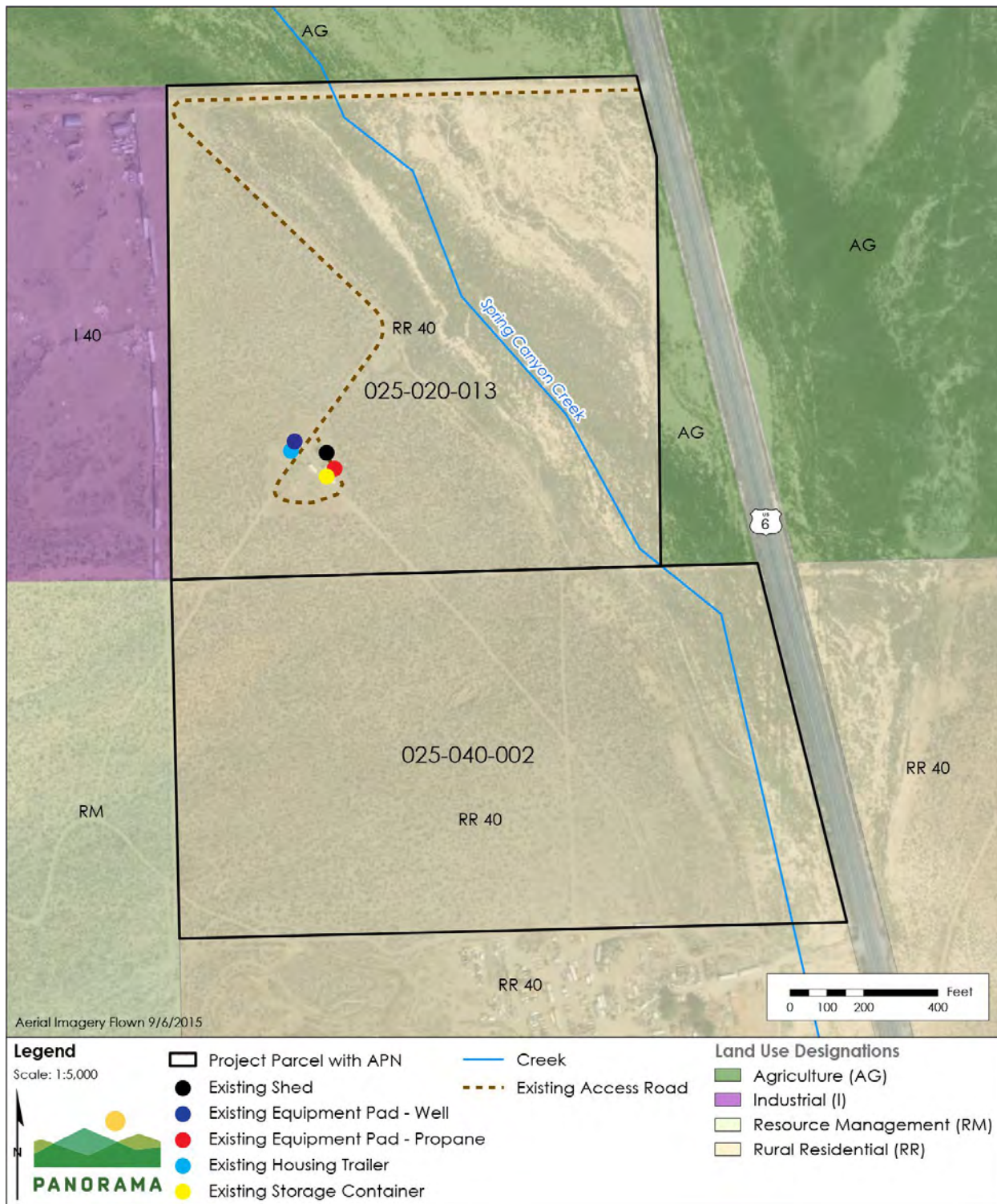
Figure 2.3-1 Project Location



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"> • Single-family dwelling • Small-scale agriculture • Accessory buildings and uses • Animals and pets • Home occupations • Manufactured home used as single-family dwelling • Accessory Dwelling Unit (ADU) or Junior Accessory Dwelling Unit (JADU) • Transitional and Supportive Housing • Outdoor cultivation of a maximum of six mature and 12 immature cannabis plants under the Compassionate Use Act 	<ul style="list-style-type: none"> • Single-family dwelling • Animals and pets (see Animal Standards Section 04.270). • Manufactured home used as a single-family dwelling^a • Accessory Dwelling Unit (as prescribed in Chapter 16 – Accessory Dwelling Units) • Accessory buildings^b and uses • Farm labor housing • 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

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"> • None 	<ul style="list-style-type: none"> • Minor alteration involving no expansions of square footage or intensification of uses and exempt from CEQA
Uses Subject to a Specific Plan Amendment	<ul style="list-style-type: none"> • Recreational amenities (e.g., art galleries, country clubs, golf courses) • Kennel • Construction of an accessory building prior to construction of the main building • Mobile home parks • Small-scale agriculture, including limited commercial agricultural activities • Manufactured housing subdivision • 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. 	<ul style="list-style-type: none"> • Any uses other than a permitted use requires an amendment to this Specific Plan • Commercial cannabis activities
Animals and Pets	<ul style="list-style-type: none"> • Minimum Lot Area Required: 10,000 square feet • Animal Units^c Permitted: <ul style="list-style-type: none"> – Less than 1 acre: one unit per 10,000 square feet of lot area with Director Review with notice – 1 to 10 acres: one unit per 10,000 square feet of lot area – More than 10 acres: no limit • 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. 	<ul style="list-style-type: none"> • Animal Units permitted by General Plan Section 04.270:
Maximum Lot Coverage	<ul style="list-style-type: none"> • 40 percent 	<ul style="list-style-type: none"> • 40 percent
Minimum Setbacks	<p>Buildings</p> <ul style="list-style-type: none"> • Front: 50 feet • Rear: 30 feet • Side: 30 feet <p>Accessory Buildings Used as Barns or Stables</p> <ul style="list-style-type: none"> • Front: 50 feet • Rear: 30 feet • Side: 30 feet 	<p>Buildings</p> <ul style="list-style-type: none"> • Front: 50 feet • Rear: 50 feet • Side: 50 feet <p>Accessory Buildings Used as Barns or Stables</p> <ul style="list-style-type: none"> • Front: 50 feet • Rear: 30 feet • Side: 30 feet

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:		
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.		

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

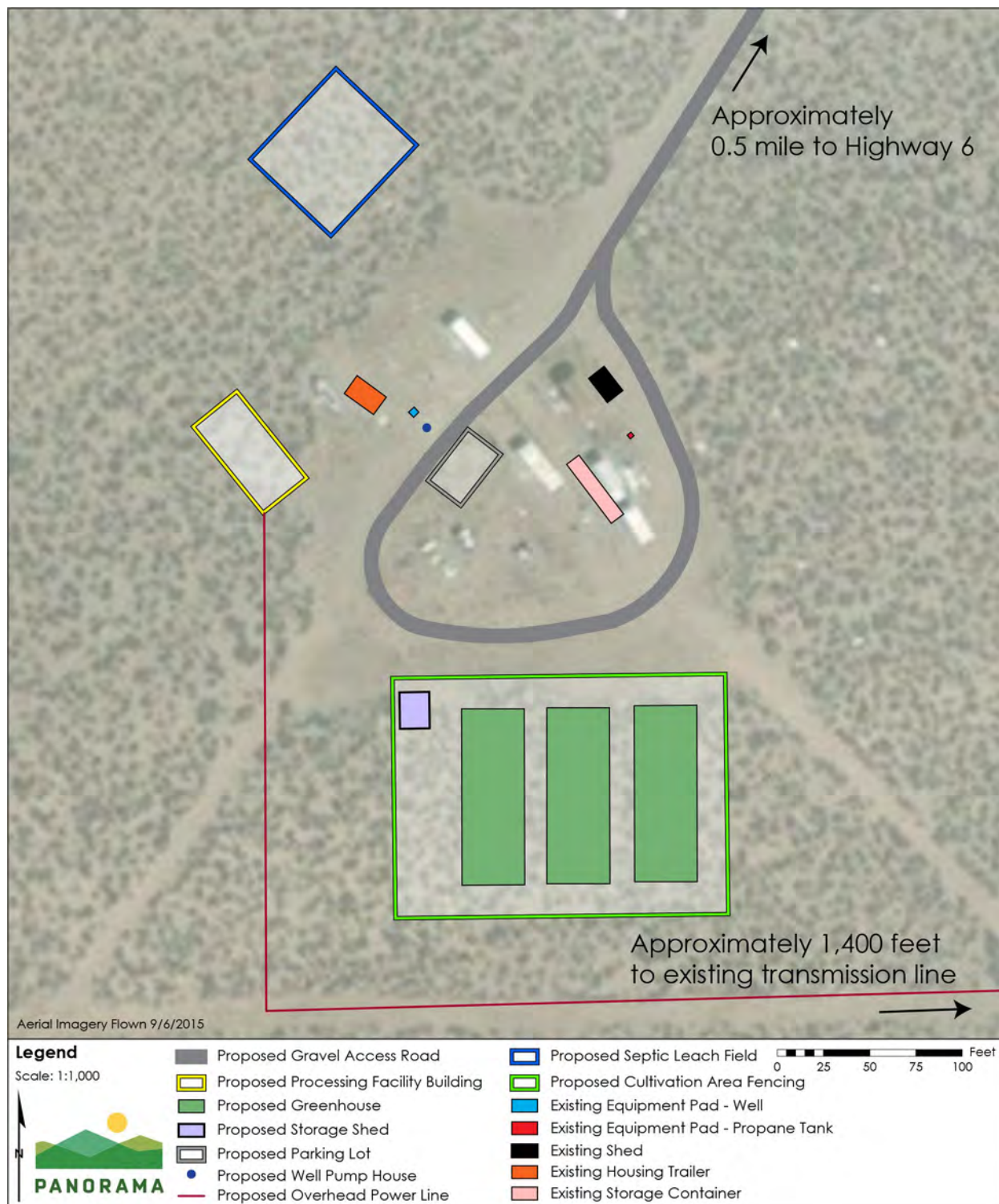
Phase	Number of Greenhouses	Indoor Cultivation Area (total square feet)	Outdoor Cultivation Area (square feet)	Total Cultivation Area (square feet)
1	1	2,880	5,760	8,640
2	2	5,760	2,880	8,640
3	3	8,640	--	8,640

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
Existing		
Dirt Access Roads and Turnaround	36,604	10 feet x 2,982 feet 8 feet x 598 feet
Equipment Pads (Well and Propane Tank)	Well: 15.7 ^a Propane Tank: 5.7 ^a	--
Shed	194.6	--
Storage Container	320	8 feet x 40 feet
Housing trailer	96	8 feet x 12 feet
Proposed Buildout		
Graveling of Existing Access Roads and Turnaround ^b	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 1 handicap-accessible space: 15 feet x 20 feet
Septic System (1,000-gallon tank)	3,920 ^a	Leach line ^c : 120 linear feet 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 vegging² 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

² 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 IMPACT CHECKLIST

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

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3.3 Agriculture and Forestry Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>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 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.

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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.

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3.4 Air Quality

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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:				
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?

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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.

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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 ^a	NO _x	CO	Sox	PM ₁₀	PM _{2.5}
Peak Daily Emission	28.1	19	14.5	0.04	8.0	4.14
SCAQMD Emissions Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

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 ^b	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Existing Conditions ^a	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
Net Operational Emissions	0.5	-0.4^c	0.8	0.002	10.2	1.1
SCAQMD Emissions Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

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Notes:

- b Modeled NO_x 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_x.
-

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 residence³. 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,

³ 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
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<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

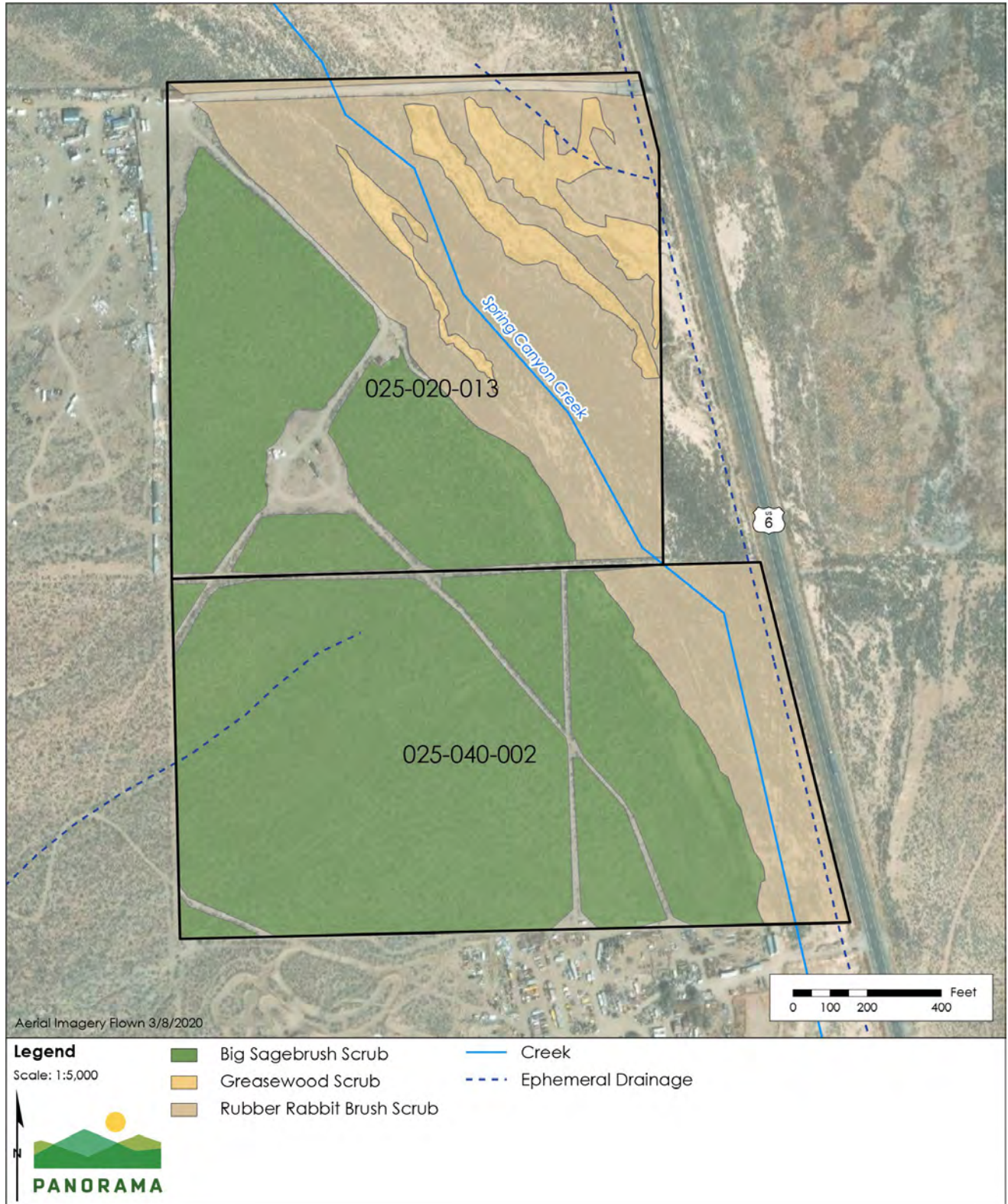
Natural Communities

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
Plants		
<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, and 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 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> (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, 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.
Wildlife		
<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.
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 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
5. CULTURAL RESOURCES. Would the project:				
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 ^a	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

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Site Number(s)	Era ^a	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)

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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 ^a	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 ^a	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
SB 18			
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
AB 52			
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-eligible 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
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<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 Perm it, Operation Perm it)

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
7. GEOLOGY AND SOILS. Would the project:				
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).

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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.

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- 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
8. GREENHOUSE GAS EMISSIONS. Would the project:				
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"/>

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- 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 CO₂e 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 ₂ e)
Construction Emissions	255
Amortized Construction Emissions (30-year period)	8.5
Operational Emissions	36
Total	44.5
Annual Emissions Threshold	900
Threshold Exceeded?	No

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- 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
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<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"/>

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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

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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.

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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 Use (Specific Plan, Use Perm it, Operation Perm it)

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 Perm it, Operation Perm it)

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 Perm it, Operation Perm it)

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 Perm it, Operation Perm it)

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
10. HYDROLOGY AND WATER QUALITY. Would the project:				
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"/>

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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"/>
a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?				

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

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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 Watershed⁴ 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

⁴ 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.

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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

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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.

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- 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.

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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
11. LAND USE AND PLANNING. Would the project:				
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.

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3.13 Mineral Resources

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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) 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?</p> <p>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?</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.

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3.14 Noise

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<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 _{max} at 50 feet)
Forklift ¹	77
Backhoe	78
Excavator	81
Dozer	82
Dump Truck	76

NOTES:

L_{max} = 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.

¹ 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 t (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
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<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
15. PUBLIC SERVICES.				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<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
16. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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
17. TRANSPORTATION. Would the project:				
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

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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
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 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) 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.				

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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.

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3.20 Utilities and Service Systems

Environmental Impacts	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<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

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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.

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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
20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<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"/>

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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.

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- 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
21. MANDATORY FINDINGS OF SIGNIFICANCE.				
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"/>

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.

3 ENVIRONMENTAL IMPACT CHECKLIST

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

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
Mono County		
Wendy Sugimura	Mono County Community Development Director	Oversight and Senior Review
Michael Draper	Mono County Planning Analyst II	Project Manager, Planning
Panorama Environmental		
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

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.

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Mitigation Monitoring and Reporting Program

Mitigation Measures	Applicable Locations	Timing	Monitoring/Reporting Action	Responsible and Involved Parties
<p>Mitigation Measure DARK-1: Dark Sky Compliance</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"> • 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 • <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>	<p>Any area within the project boundary</p>	<p>During construction</p>	<p>Install lighting in compliance with the Mono County ‘Dark Sky Ordinance’ and additional requirements indicated in the mitigation measure.</p>	<ul style="list-style-type: none"> • Project Applicant • Contractor • County

APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Applicable Locations	Timing	Monitoring/Reporting Action	Responsible and Involved Parties
<p>Mitigation Measure Air Quality-1: Odor Control Measures</p> <ul style="list-style-type: none"> 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. The applicant shall post signs at the property line 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. 	All indoor and outdoor cultivation areas	During Operations for the life of the project.	<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"> Project Applicant County
<p>Mitigation Measure Biology-1: Nesting Bird Survey</p> <p>A preconstruction survey shall be performed prior to construction. The following measures shall be implemented:</p> <ul style="list-style-type: none"> 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. 	Any area within the project boundary	<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"> Qualified biologist <hr/> Qualified biologist

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"> • 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"> – 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 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 <u>no less than 300 feet (500 feet for raptors), a smaller buffer may be</u> 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 A - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Applicable Locations	Timing	Monitoring/Reporting Action	Responsible and Involved Parties
<p>Mitigation Measure BIO-2: Prohibited Development in Sensitive Habitats</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"> • Project Applicant • County
<p>Mitigation Measure BIO-3: Mitigation for Riparian Habitat <u>and/or Fish and Game Code Section 1602 Resources</u>.</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"> • 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 	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"> • Applicant develops plan • Contractor hired by the applicant and approved by the County implements • County verifies mitigation completed

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Mitigation Measures	Applicable Locations	Timing	Monitoring/Reporting Action	Responsible and Involved Parties
<ul style="list-style-type: none"> 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. 				
<p>Mitigation Measure Cultural Resources-1: Cultural Resources Preservation and Treatment</p> <p>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. 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>	<p>Any area within the project site where eligible or known cultural resources occur.</p>	<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, (2) post signage around the exclusion zone, (3) current and future property owners will maintain the exclusion zone, (4) Native American tribe may remove or rebury the resource, (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"> County Contractor Qualified archaeologist hired by the applicant and verified by the County.

APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Applicable Locations	Timing	Monitoring/Reporting Action	Responsible and Involved Parties
<p>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.</p>			<p>confer with the tribe or historical society.</p>	
<p>Mitigation Measure Cultural Resources-2: Cultural Resources 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-2.</p>	<p>Any area within the project boundary where cultural resources are known to occur</p>	<p>During construction.</p>	<p>A qualified archaeologist will monitor ground-disturbing activities within 50 feet of any known cultural resource.</p>	<ul style="list-style-type: none"> • Qualified archaeologist hired by the applicant and approved by the County • County
<p>Mitigation Measure Cultural Resources-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:</p> <ul style="list-style-type: none"> • 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, 	<p>Any area within the project boundary</p>	<p>During construction</p>	<p>(1) Cease activity within 50 feet of the find, (2) evaluate and determine whether the resource is eligible, unique, or could be a tribal resource, (3) If the resource could be a tribal cultural resource, notify Native American tribe, (4) if a resource is considered historical, unique, or a tribal</p>	<ul style="list-style-type: none"> • Contractor • County • Qualified archaeologist hired by the applicant and verified by the County.

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"> Historic-era materials might include building or structure footings and walls and deposits of metal, glass, and/or ceramic refuse. <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>Following construction</p>	<p>cultural resource, all preservation options will be considered, (5) work may resume upon completion of resource treatment.</p> <p>Provide a public report of results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries.</p>	<ul style="list-style-type: none"> Qualified archaeologist hired by the applicant and verified by the County.

Appendix B

Air Quality and Greenhouse Gas Model Calculations

Emissions Summary

Type	Year	VOC	NOx	CO	SO2	PM10	PM2.5	CO2e
Baseline tons/year								
Operation	2021	0.0816	0.1306	0.2888	0.00051	0.2241	0.0385	34
Baseline lbs/day								
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								44
Exceed Threshold?								No
Cannabis Facility lbs/day								
Construction	2022	28.0992	19.0296	14.5449	0.0360	7.9533	4.1422	
Exceed Threshold?		No	No	No	No	No	No	
Operation	2023	2.0672	0.3079	3.8970	0.00743	11.6761	1.46720	
Operation Total		0.4305	-0.4295	0.8095	0.0020	10.1996	1.0457	
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								567
Exceed Threshold?								No
Field Crops lbs/day								
Construction	2024	49.5537	14.2325	13.9410	0.0266	3.4518	3.9788	
Exceed Threshold?		No	No	No	No	No	No	
Operation	2025	7.1450	2.2054	12.4586	0.0239	1.6044	1.2579	
Operation Total		5.5083	1.4680	9.3711	0.0184	0.1279	0.8364	
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								259
Exceed Threshold?								No
Livestock lbs/day								
Construction	2024	56.2694	9.7515	7.9281	0.0159	5.8148	2.9642	
Exceed Threshold?		No	No	No	No	No	No	
Operation	2025	6.9298	2.7727	11.4179	0.0235	1.6037	1.2731	
Operation Total		5.2931	2.0353	8.3304	0.0180	0.1272	0.8516	
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
SCAQMD Emission Threshold lbs/day								
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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1	Operational Year		2023	
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	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

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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
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
Total	0.0816	0.1306	0.2888	5.1000e-004	0.2073	0.0168	0.2241	0.0217	0.0168	0.0385	1.1470	32.7078	33.8548	0.0102	4.4000e-004	34.2409

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

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
Total	0.0816	0.1306	0.2888	5.1000e-004	0.2073	0.0168	0.2241	0.0217	0.0168	0.0385	1.1470	32.7078	33.8548	0.0102	4.4000e-004	34.2409

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	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
Total		0.0000	0.0000	0.0000	0.0000

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
Total		0.0000	0.0000	0.0000	0.0000

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
Total	0.0639	1.3200e-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

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

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
Total	0.0639	1.3200e-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

7.0 Water Detail

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
Total		0.1087	2.1300e-003	5.0000e-005	0.1772

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

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
Total		0.1087	2.1300e-003	5.0000e-005	0.1772

8.0 Waste Detail

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

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

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
Total		0.0934	5.5200e-003	0.0000	0.2313

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
Total		0.0934	5.5200e-003	0.0000	0.2313

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, 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					
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
Total	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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

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

Equipment Type	Number
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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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1	Operational Year		2023	
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	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
Total	1.6367	0.7374	3.0875	5.4800e-003	1.1787	0.2978	1.4765	0.1238	0.2977	0.4215	27.7717	208.8266	236.5984	0.0351	4.0000e-003	238.6682

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
Total	1.6367	0.7374	3.0875	5.4800e-003	1.1787	0.2978	1.4765	0.1238	0.2977	0.4215	27.7717	208.8266	236.5984	0.0351	4.0000e-003	238.6682

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	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
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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	
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	

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
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

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
Total	1.5382	0.0308	1.9716	3.4200e-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

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
Total	1.5382	0.0308	1.9716	3.4200e-003		0.2653	0.2653		0.2653	0.2653	27.7717	11.7956	39.5673	0.0258	2.1800e-003	40.8626

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
Total	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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

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

Equipment Type	Number
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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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	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
Total	0.1938	0.0470	0.4716	6.8000e-004	1.5355	0.0118	1.5473	0.1610	0.0117	0.1728	3.7758	61.2828	65.0586	0.1732	2.5500e-003	70.1483

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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
Total	0.1938	0.0470	0.4716	6.8000e-004	1.5355	0.0118	1.5473	0.1610	0.0117	0.1728	3.7758	61.2828	65.0586	0.1732	2.5500e-003	70.1483

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	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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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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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
Total	0.0169	0.1662	0.1396	2.4000e-004	2.5000e-004	8.3800e-003	8.6300e-003	4.0000e-005	7.8300e-003	7.8700e-003	0.0000	21.0777	21.0777	5.3700e-003	0.0000	21.2120

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
Total	7.5000e-004	6.8000e-004	5.6500e-003	1.0000e-005	1.6300e-003	1.0000e-005	1.6400e-003	4.3000e-004	1.0000e-005	4.5000e-004	0.0000	1.4017	1.4017	4.0000e-005	5.0000e-005	1.4178

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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
Total	0.0169	0.1662	0.1396	2.4000e-004	1.1000e-004	8.3800e-003	8.4900e-003	2.0000e-005	7.8300e-003	7.8500e-003	0.0000	21.0777	21.0777	5.3700e-003	0.0000	21.2119

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
Total	7.5000e-004	6.8000e-004	5.6500e-003	1.0000e-005	1.6300e-003	1.0000e-005	1.6400e-003	4.3000e-004	1.0000e-005	4.5000e-004	0.0000	1.4017	1.4017	4.0000e-005	5.0000e-005	1.4178

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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
Total	1.3100e-003	0.0146	7.0900e-003	2.0000e-005	6.2700e-003	6.2000e-004	6.8900e-003	3.0000e-003	5.7000e-004	3.5700e-003	0.0000	1.5115	1.5115	4.9000e-004	0.0000	1.5238

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
Total	1.5000e-004	4.5600e-003	1.3300e-003	2.0000e-005	6.0000e-004	4.0000e-005	6.5000e-004	1.7000e-004	4.0000e-005	2.1000e-004	0.0000	1.7939	1.7939	0.0000	2.7000e-004	1.8750

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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
Total	1.3100e-003	0.0146	7.0900e-003	2.0000e-005	2.8200e-003	6.2000e-004	3.4400e-003	1.3500e-003	5.7000e-004	1.9200e-003	0.0000	1.5115	1.5115	4.9000e-004	0.0000	1.5238

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
Total	1.5000e-004	4.5600e-003	1.3300e-003	2.0000e-005	6.0000e-004	4.0000e-005	6.5000e-004	1.7000e-004	4.0000e-005	2.1000e-004	0.0000	1.7939	1.7939	0.0000	2.7000e-004	1.8750

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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
Total	3.0800e-003	0.0340	0.0184	4.0000e-005	0.0142	1.4800e-003	0.0157	6.8500e-003	1.3700e-003	8.2200e-003	0.0000	3.6205	3.6205	1.1700e-003	0.0000	3.6498

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
Total	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

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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
Total	3.0800e-003	0.0340	0.0184	4.0000e-005	6.3700e-003	1.4800e-003	7.8500e-003	3.0800e-003	1.3700e-003	4.4500e-003	0.0000	3.6205	3.6205	1.1700e-003	0.0000	3.6498

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
Total	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

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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
Total	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

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
Total	0.0132	0.0449	0.0992	3.6000e-004	0.0278	4.6000e-004	0.0283	7.4900e-003	4.3000e-004	7.9300e-003	0.0000	33.8146	33.8146	7.1000e-004	2.4800e-003	34.5701

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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
Total	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

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
Total	0.0132	0.0449	0.0992	3.6000e-004	0.0278	4.6000e-004	0.0283	7.4900e-003	4.3000e-004	7.9300e-003	0.0000	33.8146	33.8146	7.1000e-004	2.4800e-003	34.5701

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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
Total	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

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
Total	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

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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
Total	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

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
Total	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

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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
Total	0.1404	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

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
Total	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

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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
Total	0.1404	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

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
Total	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

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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	0.0273	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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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

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

Historical Energy Use: N

5.1 Mitigation Measures Energy

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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					
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

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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
Total		2.2000e-004	1.9700e-003	1.5800e-003	1.0000e-005		1.6000e-004	1.6000e-004		1.6000e-004	1.6000e-004	0.0000	2.1545	2.1545	4.0000e-005	4.0000e-005	2.1673

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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
Total		2.2000e-004	1.9700e-003	1.5800e-003	1.0000e-005		1.6000e-004	1.6000e-004		1.6000e-004	1.6000e-004	0.0000	2.1545	2.1545	4.0000e-005	4.0000e-005	2.1673

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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			
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
Total		8.7337	7.4000e-004	9.0000e-005	8.7787

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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			
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
Total		8.7337	7.4000e-004	9.0000e-005	8.7787

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	0.1219	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
Total	0.1219	1.3200e-003	0.0853	1.4000e-004		0.0109	0.0109		0.0109	0.0109	1.0330	0.4461	1.4791	9.6000e-004	8.0000e-005	1.5275

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
Total	0.1219	1.3200e-003	0.0853	1.4000e-004		0.0109	0.0109		0.0109	0.0109	1.0330	0.4461	1.4791	9.6000e-004	8.0000e-005	1.5275

7.0 Water Detail

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	0.1090	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
Total		0.1090	2.1400e-003	5.0000e-005	0.1777

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
Total		0.1090	2.1400e-003	5.0000e-005	0.1777

8.0 Waste Detail

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
Total		2.7221	0.1609	0.0000	6.7439

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
Total		2.7221	0.1609	0.0000	6.7439

9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
Emergency Generator	1	0	50	202	0.73	CNG

Boilers

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

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
Total	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

11.0 Vegetation

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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1			Operational Year	2023
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	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
Total	2.0672	0.3079	3.8970	7.4300e-003	11.4064	0.2697	11.6761	1.1977	0.2695	1.4672	27.7717	423.9480	451.7197	0.0495	0.0199	458.8944

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
Total	2.0672	0.3079	3.8970	7.4300e-003	11.4064	0.2697	11.6761	1.1977	0.2695	1.4672	27.7717	423.9480	451.7197	0.0495	0.0199	458.8944

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	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	

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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
Total	1.6889	16.6217	13.9605	0.0241	0.0254	0.8379	0.8633	3.8400e-003	0.7829	0.7867		2,323.4168	2,323.4168	0.5921		2,338.2191

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
Total	0.0759	0.0603	0.5844	1.5900e-003	0.1678	1.1200e-003	0.1689	0.0445	1.0300e-003	0.0455		160.7145	160.7145	4.3400e-003	5.1000e-003	162.3449

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
Total	1.6889	16.6217	13.9605	0.0241	0.0114	0.8379	0.8493	1.7300e-003	0.7829	0.7846	0.0000	2,323.4168	2,323.4168	0.5921		2,338.2191

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
Total	0.0759	0.0603	0.5844	1.5900e-003	0.1678	1.1200e-003	0.1689	0.0445	1.0300e-003	0.0455		160.7145	160.7145	4.3400e-003	5.1000e-003	162.3449

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
Total	1.3122	14.6277	7.0939	0.0172	6.2662	0.6225	6.8887	3.0041	0.5727	3.5768		1,666.1738	1,666.1738	0.5389		1,679.6457

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
Total	0.1499	4.4019	1.3278	0.0188	0.6196	0.0448	0.6644	0.1691	0.0428	0.2119		1,980.4439	1,980.4439	7.4800e-003	0.2989	2,069.6851

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
Total	1.3122	14.6277	7.0939	0.0172	2.8198	0.6225	3.4423	1.3518	0.5727	1.9246	0.0000	1,666.1738	1,666.1738	0.5389		1,679.6457

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
Total	0.1499	4.4019	1.3278	0.0188	0.6196	0.0448	0.6644	0.1691	0.0428	0.2119		1,980.4439	1,980.4439	7.4800e-003	0.2989	2,069.6851

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
Total	1.5403	16.9836	9.2202	0.0206	7.0826	0.7423	7.8249	3.4247	0.6829	4.1076		1,995.4825	1,995.4825	0.6454		2,011.6169

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
Total	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

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
Total	1.5403	16.9836	9.2202	0.0206	3.1872	0.7423	3.9294	1.5411	0.6829	2.2240	0.0000	1,995.4825	1,995.4825	0.6454		2,011.6169

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
Total	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

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
Total	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

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
Total	0.1322	0.4241	1.0151	3.7200e-003	0.2873	4.6100e-003	0.2919	0.0772	4.3600e-003	0.0815		381.7287	381.7287	7.3900e-003	0.0266	389.8314

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
Total	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

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
Total	0.1322	0.4241	1.0151	3.7200e-003	0.2873	4.6100e-003	0.2919	0.0772	4.3600e-003	0.0815		381.7287	381.7287	7.3900e-003	0.0266	389.8314

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
Total	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

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
Total	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

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
Total	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

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
Total	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

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
Total	28.0760	1.4085	1.8136	2.9700e-003		0.0817	0.0817		0.0817	0.0817		281.4481	281.4481	0.0183		281.9062

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
Total	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

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
Total	28.0760	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

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
Total	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

4.0 Operational Detail - Mobile

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
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
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
Total		1.1900e-003	0.0108	8.6300e-003	7.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		13.0136	13.0136	2.4000e-004	2.3000e-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

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
Total		1.1900e-003	0.0108	8.6300e-003	7.0000e-005		8.2000e-004	8.2000e-004		8.2000e-004	8.2000e-004		13.0136	13.0136	2.4000e-004	2.3000e-004	13.0909

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
Total	1.8558	0.0309	1.9762	3.4200e-003		0.2653	0.2653		0.2653	0.2653	27.7717	11.8055	39.5772	0.0258	2.1800e-003	40.8731

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
Total	1.8558	0.0309	1.9762	3.4200e-003		0.2653	0.2653		0.2653	0.2653	27.7717	11.8055	39.5772	0.0258	2.1800e-003	40.8731

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
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10.0 Stationary Equipment

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
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User Defined Equipment

Equipment Type	Number
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10.1 Stationary Sources

Unmitigated/Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Equipment Type	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
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

11.0 Vegetation

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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1			Operational Year	2025
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	390.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - 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

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
Total	0.4658	0.2980	1.1623	2.0800e-003	0.0788	0.0544	0.1332	0.0211	0.0535	0.0746	8.1933	148.7129	156.9062	0.3211	6.2700e-003	166.8040

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
Total	0.4658	0.2980	1.1623	2.0800e-003	0.0788	0.0544	0.1332	0.0211	0.0535	0.0746	8.1933	148.7129	156.9062	0.3211	6.2700e-003	166.8040

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

3.0 Construction Detail

Construction Phase

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

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

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
Total	0.0144	0.1389	0.1349	2.4000e-004	2.5000e-004	6.3100e-003	6.5600e-003	4.0000e-005	5.8900e-003	5.9300e-003	0.0000	21.0916	21.0916	5.3400e-003	0.0000	21.2250

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
Total	5.8000e-004	3.6300e-003	4.4300e-003	2.0000e-005	1.6600e-003	4.0000e-005	1.6900e-003	4.4000e-004	4.0000e-005	4.8000e-004	0.0000	2.3136	2.3136	3.0000e-005	2.4000e-004	2.3853

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

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
Total	0.0144	0.1389	0.1349	2.4000e-004	1.1000e-004	6.3100e-003	6.4200e-003	2.0000e-005	5.8900e-003	5.9100e-003	0.0000	21.0915	21.0915	5.3400e-003	0.0000	21.2250

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
Total	5.8000e-004	3.6300e-003	4.4300e-003	2.0000e-005	1.6600e-003	4.0000e-005	1.6900e-003	4.4000e-004	4.0000e-005	4.8000e-004	0.0000	2.3136	2.3136	3.0000e-005	2.4000e-004	2.3853

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

3.3 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
Total	1.1100e-003	0.0118	6.6300e-003	2.0000e-005	6.2700e-003	4.8000e-004	6.7500e-003	3.0000e-003	4.4000e-004	3.4400e-003	0.0000	1.5113	1.5113	4.9000e-004	0.0000	1.5235

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
Total	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

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

3.3 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
Total	1.1100e-003	0.0118	6.6300e-003	2.0000e-005	2.8200e-003	4.8000e-004	3.3000e-003	1.3500e-003	4.4000e-004	1.7900e-003	0.0000	1.5113	1.5113	4.9000e-004	0.0000	1.5235

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
Total	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

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

3.4 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
Total	2.6000e-003	0.0276	0.0174	4.0000e-005	0.0142	1.1400e-003	0.0153	6.8500e-003	1.0500e-003	7.9000e-003	0.0000	3.6207	3.6207	1.1700e-003	0.0000	3.6500

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
Total	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

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

3.4 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
Total	2.6000e-003	0.0276	0.0174	4.0000e-005	6.3700e-003	1.1400e-003	7.5100e-003	3.0800e-003	1.0500e-003	4.1300e-003	0.0000	3.6207	3.6207	1.1700e-003	0.0000	3.6500

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
Total	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

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

3.5 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
Total	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

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
Total	4.9400e-003	0.0244	0.0374	1.8000e-004	0.0128	2.2000e-004	0.0130	3.4500e-003	2.1000e-004	3.6600e-003	0.0000	16.8433	16.8433	2.5000e-004	1.4800e-003	17.2929

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

3.5 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
Total	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

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
Total	4.9400e-003	0.0244	0.0374	1.8000e-004	0.0128	2.2000e-004	0.0130	3.4500e-003	2.1000e-004	3.6600e-003	0.0000	16.8433	16.8433	2.5000e-004	1.4800e-003	17.2929

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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
Total	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

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
Total	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

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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
Total	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

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
Total	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

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

3.7 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
Total	0.2477	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

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
Total	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

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

3.7 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
Total	0.2477	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

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
Total	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

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

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

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

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
NaturalGas 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
NaturalGas 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

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

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
Total		1.7000e-004	1.4900e-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

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

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
Total		1.7000e-004	1.4900e-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

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

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
Total		4.5956	3.9000e-004	5.0000e-005	4.6193

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

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
Total		4.5956	3.9000e-004	5.0000e-005	4.6193

6.0 Area Detail

6.1 Mitigation Measures 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

	ROG	NOx	CO	SO2	Fugitive 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
Total	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

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

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
Total	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

7.0 Water Detail

7.1 Mitigation Measures Water

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

	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
Total		4.3385	0.1082	2.5800e-003	7.8141

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

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
Total		4.3385	0.1082	2.5800e-003	7.8141

8.0 Waste Detail

8.1 Mitigation Measures Waste

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

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
Total		3.0104	0.1779	0.0000	7.4580

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

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
Total		3.0104	0.1779	0.0000	7.4580

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

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

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
Total	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

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
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User Defined Equipment

Equipment Type	Number
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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

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
Total	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

11.0 Vegetation

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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1	Operational Year	2025		
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	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

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
Total	7.1450	2.2054	12.4586	0.0239	0.4638	1.1405	1.6044	0.1236	1.1343	1.2579	111.0869	1,059.7583	1,170.8452	0.3061	0.0283	1,186.9335

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
Total	7.1450	2.2054	12.4586	0.0239	0.4638	1.1405	1.6044	0.1236	1.1343	1.2579	111.0869	1,059.7583	1,170.8452	0.3061	0.0283	1,186.9335

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	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
Total	1.4397	13.8867	13.4879	0.0241	0.0254	0.6311	0.6565	3.8400e-003	0.5895	0.5933		2,324.9459	2,324.9459	0.5884		2,339.6562

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
Total	0.0579	0.3458	0.4531	2.5000e-003	0.1707	3.9100e-003	0.1746	0.0457	3.7100e-003	0.0494		259.3595	259.3595	2.9800e-003	0.0260	267.1662

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
Total	1.4397	13.8867	13.4879	0.0241	0.0114	0.6311	0.6425	1.7300e-003	0.5895	0.5912	0.0000	2,324.9459	2,324.9459	0.5884		2,339.6562

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
Total	0.0579	0.3458	0.4531	2.5000e-003	0.1707	3.9100e-003	0.1746	0.0457	3.7100e-003	0.0494		259.3595	259.3595	2.9800e-003	0.0260	267.1662

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
Total	1.1067	11.8407	6.6317	0.0172	6.2662	0.4823	6.7485	3.0041	0.4437	3.4478		1,665.8826	1,665.8826	0.5388		1,679.3521

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
Total	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

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
Total	1.1067	11.8407	6.6317	0.0172	2.8198	0.4823	3.3020	1.3518	0.4437	1.7955	0.0000	1,665.8826	1,665.8826	0.5388		1,679.3521

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
Total	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

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
Total	1.3015	13.8178	8.6998	0.0206	7.0826	0.5722	7.6548	3.4247	0.5265	3.9512		1,995.5803	1,995.5803	0.6454		2,011.7155

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
Total	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

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
Total	1.3015	13.8178	8.6998	0.0206	3.1872	0.5722	3.7594	1.5411	0.5265	2.0676	0.0000	1,995.5803	1,995.5803	0.6454		2,011.7155

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
Total	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

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
Total	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

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
Total	0.0496	0.2320	0.3808	1.8400e-003	0.1318	2.2500e-003	0.1341	0.0355	2.1300e-003	0.0376		189.1250	189.1250	2.5500e-003	0.0161	193.9980

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
Total	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

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
Total	0.0496	0.2320	0.3808	1.8400e-003	0.1318	2.2500e-003	0.1341	0.0355	2.1300e-003	0.0376		189.1250	189.1250	2.5500e-003	0.0161	193.9980

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
Total	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

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
Total	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

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
Total	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

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
Total	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

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
Total	49.5435	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443

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
Total	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

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
Total	49.5435	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

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
Total	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

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
Total		9.5000e-004	8.1200e-003	3.4500e-003	6.0000e-005		6.5000e-004	6.5000e-004		6.5000e-004	6.5000e-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

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
Total		9.5000e-004	8.1200e-003	3.4500e-003	6.0000e-005		6.5000e-004	6.5000e-004		6.5000e-004	6.5000e-004		10.3646	10.3646	2.0000e-004	1.9000e-004	10.4262

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
Total	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

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
Total	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

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
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
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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
Total	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

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
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User Defined Equipment

Equipment Type	Number
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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

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
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

11.0 Vegetation

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

**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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1	Operational Year		2025	
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	390.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - 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, 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	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
Total	0.4226	0.3692	1.0079	2.0000e-003	0.0719	0.0574	0.1293	0.0192	0.0563	0.0755	6.0060	142.0073	148.0134	0.1614	4.3700e-003	153.3518

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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
Total	0.4226	0.3692	1.0079	2.0000e-003	0.0719	0.0574	0.1293	0.0192	0.0563	0.0755	6.0060	142.0073	148.0134	0.1614	4.3700e-003	153.3518

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

3.0 Construction Detail

Construction Phase

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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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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
Total	3.0800e-003	0.0274	0.0370	6.0000e-005	2.5000e-004	1.2500e-003	1.5000e-003	4.0000e-005	1.2000e-003	1.2400e-003	0.0000	5.2104	5.2104	9.4000e-004	0.0000	5.2339

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
Total	3.2000e-004	3.4700e-003	2.6200e-003	2.0000e-005	1.0400e-003	3.0000e-005	1.0700e-003	2.7000e-004	3.0000e-005	3.2000e-004	0.0000	1.8293	1.8293	1.0000e-005	2.2000e-004	1.8967

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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
Total	3.0800e-003	0.0274	0.0370	6.0000e-005	1.1000e-004	1.2500e-003	1.3600e-003	2.0000e-005	1.2000e-003	1.2200e-003	0.0000	5.2104	5.2104	9.4000e-004	0.0000	5.2339

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
Total	3.2000e-004	3.4700e-003	2.6200e-003	2.0000e-005	1.0400e-003	3.0000e-005	1.0700e-003	2.7000e-004	3.0000e-005	3.2000e-004	0.0000	1.8293	1.8293	1.0000e-005	2.2000e-004	1.8967

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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
Total	2.5000e-004	2.8000e-003	1.9500e-003	0.0000	2.7000e-004	1.0000e-004	3.7000e-004	3.0000e-005	9.0000e-005	1.2000e-004	0.0000	0.4274	0.4274	1.4000e-004	0.0000	0.4309

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
Total	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

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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
Total	2.5000e-004	2.8000e-003	1.9500e-003	0.0000	1.2000e-004	1.0000e-004	2.2000e-004	1.0000e-005	9.0000e-005	1.0000e-004	0.0000	0.4274	0.4274	1.4000e-004	0.0000	0.4309

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
Total	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

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

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
Total	9.1000e-004	9.7300e-003	5.5500e-003	1.0000e-005	5.3100e-003	4.0000e-004	5.7100e-003	2.5700e-003	3.7000e-004	2.9400e-003	0.0000	1.2380	1.2380	4.0000e-004	0.0000	1.2480

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
Total	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

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

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
Total	9.1000e-004	9.7300e-003	5.5500e-003	1.0000e-005	2.3900e-003	4.0000e-004	2.7900e-003	1.1600e-003	3.7000e-004	1.5300e-003	0.0000	1.2380	1.2380	4.0000e-004	0.0000	1.2480

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
Total	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

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

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
Total	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

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
Total	1.2300e-003	7.3500e-003	9.4000e-003	5.0000e-005	3.3400e-003	6.0000e-005	3.4200e-003	9.1000e-004	6.0000e-005	9.7000e-004	0.0000	4.7064	4.7064	6.0000e-005	4.6000e-004	4.8459

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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
Total	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

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
Total	1.2300e-003	7.3500e-003	9.4000e-003	5.0000e-005	3.3400e-003	6.0000e-005	3.4200e-003	9.1000e-004	6.0000e-005	9.7000e-004	0.0000	4.7064	4.7064	6.0000e-005	4.6000e-004	4.8459

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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
Total	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

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
Total	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

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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
Total	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

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
Total	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

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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
Total	0.1407	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

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
Total	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

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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
Total	0.1407	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

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
Total	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

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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	0.0364	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

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

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
NaturalGas 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
NaturalGas 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

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

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
Total		2.5000e-004	2.1700e-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	4.0000e-005	4.0000e-005	2.4734

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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					
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
Total		2.5000e-004	2.1700e-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	4.0000e-005	4.0000e-005	2.4734

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

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
Total		7.5892	6.4000e-004	8.0000e-005	7.6284

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

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
Total		7.5892	6.4000e-004	8.0000e-005	7.6284

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
Total	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

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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
Total	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

7.0 Water Detail

7.1 Mitigation Measures Water

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

	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
Total		1.6832	0.0387	9.2000e-004	2.9277

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

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
Total		1.6832	0.0387	9.2000e-004	2.9277

8.0 Waste Detail

8.1 Mitigation Measures Waste

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

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
Total		1.4981	0.0885	0.0000	3.7114

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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
Total		1.4981	0.0885	0.0000	3.7114

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

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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					
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
Total	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

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
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User Defined Equipment

Equipment Type	Number
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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
Total	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

11.0 Vegetation

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

Urbanization	Rural	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	54
Climate Zone	1	Operational Year		2025	
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	390.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - 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

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
Total	6.9298	2.7727	11.4179	0.0235	0.4397	1.1641	1.6037	0.1171	1.1560	1.2731	111.0869	1,020.8561	1,131.9430	0.2984	0.0274	1,147.5656

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
Total	6.9298	2.7727	11.4179	0.0235	0.4397	1.1641	1.6037	0.1171	1.1560	1.2731	111.0869	1,020.8561	1,131.9430	0.2984	0.0274	1,147.5656

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

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	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
Total	0.6156	5.4776	7.3949	0.0120	0.0507	0.2504	0.3011	7.6800e-003	0.2392	0.2469		1,148.6874	1,148.6874	0.2080		1,153.8870

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
Total	0.0648	0.6645	0.5332	3.9000e-003	0.2137	7.1600e-003	0.2208	0.0575	6.8200e-003	0.0643		407.5046	407.5046	3.3100e-003	0.0492	422.2570

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
Total	0.6156	5.4776	7.3949	0.0120	0.0228	0.2504	0.2732	3.4500e-003	0.2392	0.2427	0.0000	1,148.6874	1,148.6874	0.2080		1,153.8870

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
Total	0.0648	0.6645	0.5332	3.9000e-003	0.2137	7.1600e-003	0.2208	0.0575	6.8200e-003	0.0643		407.5046	407.5046	3.3100e-003	0.0492	422.2570

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
Total	0.4985	5.6040	3.8921	9.7300e-003	0.5303	0.2012	0.7315	0.0573	0.1851	0.2424		942.2742	942.2742	0.3048		949.8930

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
Total	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

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
Total	0.4985	5.6040	3.8921	9.7300e-003	0.2386	0.2012	0.4398	0.0258	0.1851	0.2109	0.0000	942.2742	942.2742	0.3048		949.8930

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
Total	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

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
Total	0.9132	9.7297	5.5468	0.0141	5.3119	0.4001	5.7120	2.5686	0.3681	2.9367		1,364.6623	1,364.6623	0.4414		1,375.6962

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
Total	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

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
Total	0.9132	9.7297	5.5468	0.0141	2.3904	0.4001	2.7905	1.1559	0.3681	1.5240	0.0000	1,364.6623	1,364.6623	0.4414		1,375.6962

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
Total	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

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
Total	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

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
Total	0.0246	0.1404	0.1916	1.0200e-003	0.0690	1.4400e-003	0.0704	0.0185	1.3700e-003	0.0199		105.4837	105.4837	1.2600e-003	0.0101	108.5174

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
Total	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

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
Total	0.0246	0.1404	0.1916	1.0200e-003	0.0690	1.4400e-003	0.0704	0.0185	1.3700e-003	0.0199		105.4837	105.4837	1.2600e-003	0.0101	108.5174

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
Total	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

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
Total	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

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
Total	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

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
Total	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

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
Total	56.2643	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443

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
Total	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

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
Total	56.2643	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

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
Total	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

4.0 Operational Detail - Mobile

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
Total		1.3600e-003	0.0119	6.5900e-003	8.0000e-005		9.3000e-004	9.3000e-004		9.3000e-004	9.3000e-004		14.8513	14.8513	2.9000e-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

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
Total		1.3600e-003	0.0119	6.5900e-003	8.0000e-005		9.3000e-004	9.3000e-004		9.3000e-004	9.3000e-004		14.8513	14.8513	2.9000e-004	2.7000e-004	14.9395

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
Total	6.4224	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

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
Total	6.4224	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

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
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
Total	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

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
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User Defined Equipment

Equipment Type	Number
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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

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
Total	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

11.0 Vegetation

Field Crops Buidout Scenario - GHG Calculation

	Area/acre
Single Family Dwelling	0.1
Accessory Dwelling	0.046
Accessary Building	0.3
Field Crops	78.004
Alfalfa-leading crop in Mono County.	

Crop	Annual GHG Emissions/Acre (MTCO₂e) 1	Total Annual GHG Emissions for Project (MTCO₂e)
Rice	5.47	426.68188
Lettuce	4.74	369.73896
Tomatoes	3.95	308.1158
Wine Grapes	1.23	95.94492
Almonds	1.7	132.6068
Corn	0.65	50.7026
Alfalfa 2	-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 CO₂e and farming activities = 1.73 MT CO₂e.

Source: American Farmland Trust, A New Comparison of Greenhouse Gas Emissions form California Agricultural

Livestock Buildout Scenario GHG Calculation

	Area/acre
Single Family Dwelling	0.1
Accessory Dwelling	0.046
Accessory Building	0.1
Livestock	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.	

	(2017 CA Data)	Average Live Weight/kg
Commercial Cattle Slaughter	1,346	610.53
Source: USDA, National Agricultural Statistics Service, Livestock Slaughter, January 25, 2018.		

Commodities	GHG Emissions (kg CO2 eq. per kg of product) 1	Total GHG Emission (kg CO2 eq.) for 39 Animals	Total GHG Emission (MT CO2 eq.) for 39 Animals	GHG Emission/Year (MT CO2 eq.) for 39 Animals 2
Milk: production, processing and transport	2.4			
Meat: produced from slaughtered dairy cows and bulls (carcass weight)	15.6			
Meat: produced from fattened surplus calves (carcass weight)	20.2	480,979.34	480.98	137.42

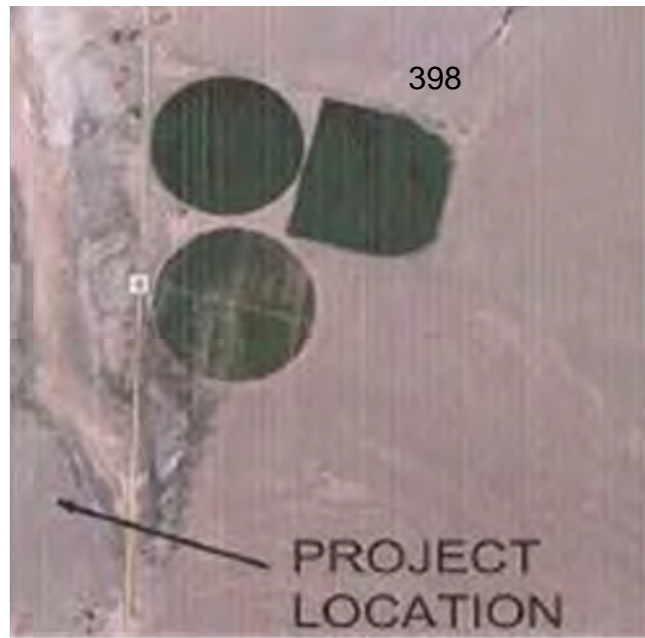
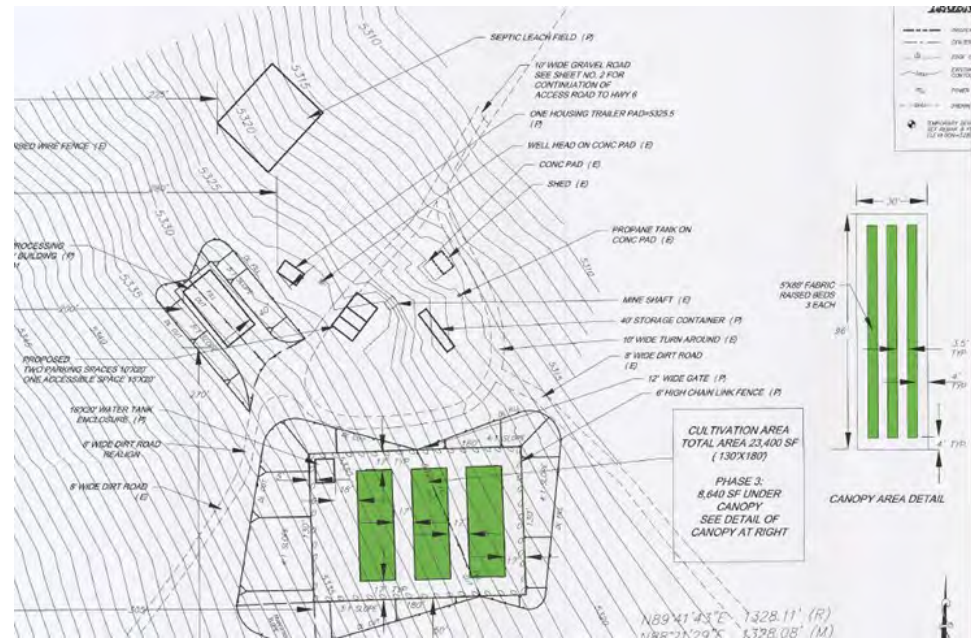
Notes:

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

Focused Rare Plants Survey



Mono County Apogee Farms Focused Rare Plant Survey Report

August 2020

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Mono County Apogee Farms Focused Rare Plant Survey Report

August 2020

Prepared for:

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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

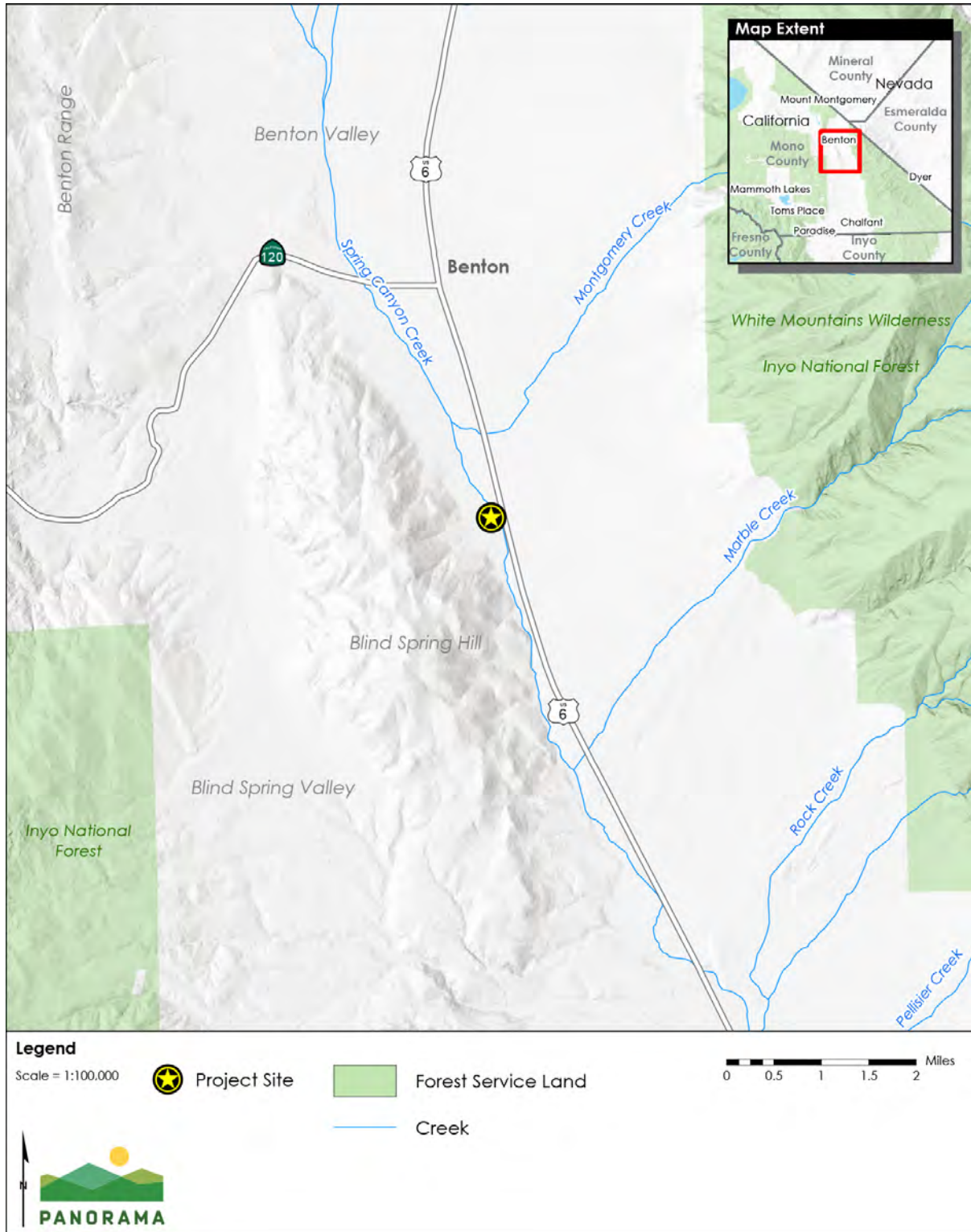
Latitude, Longitude: 37.784047, -118.468509

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

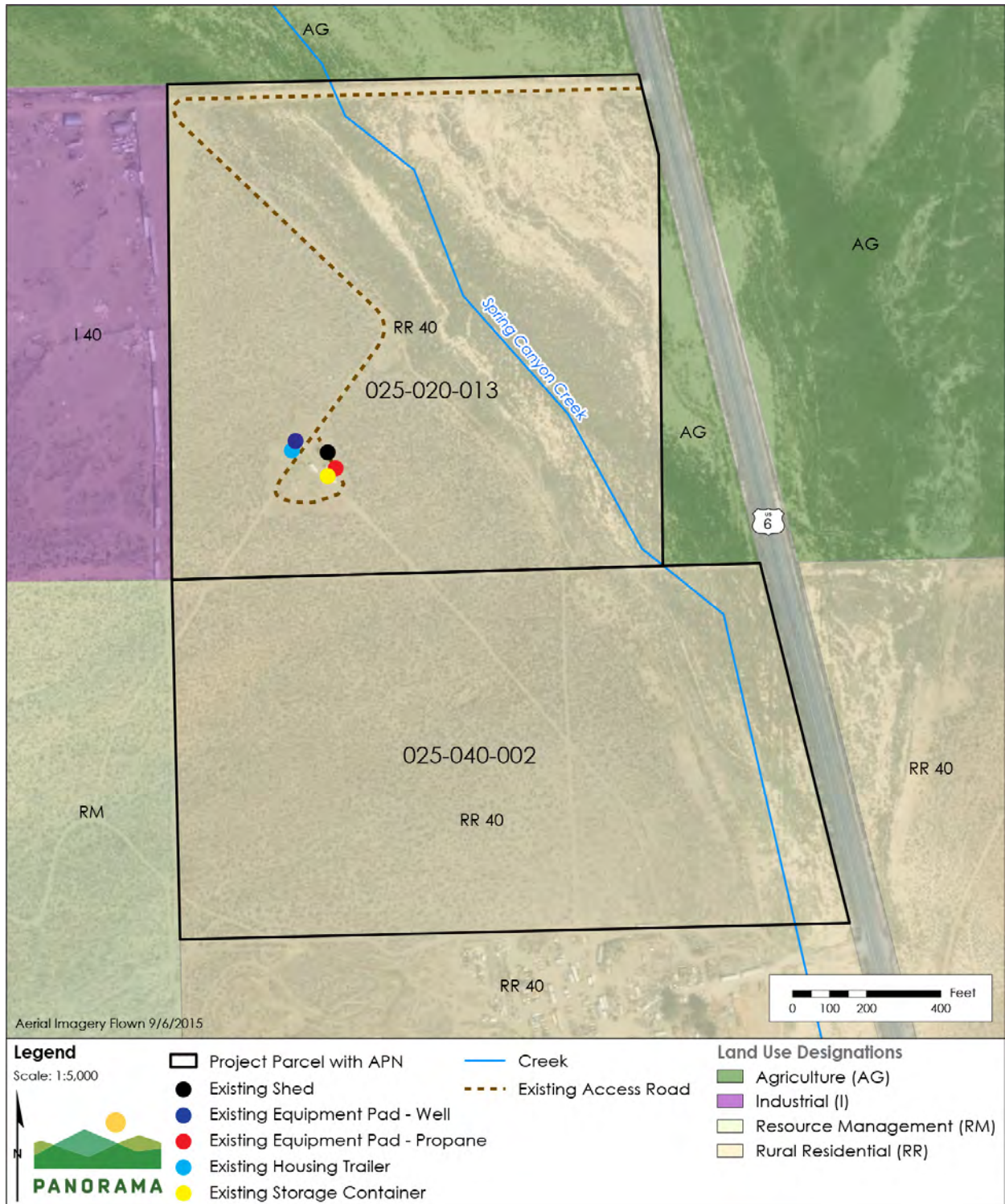
Figure 1: Regional Location



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)

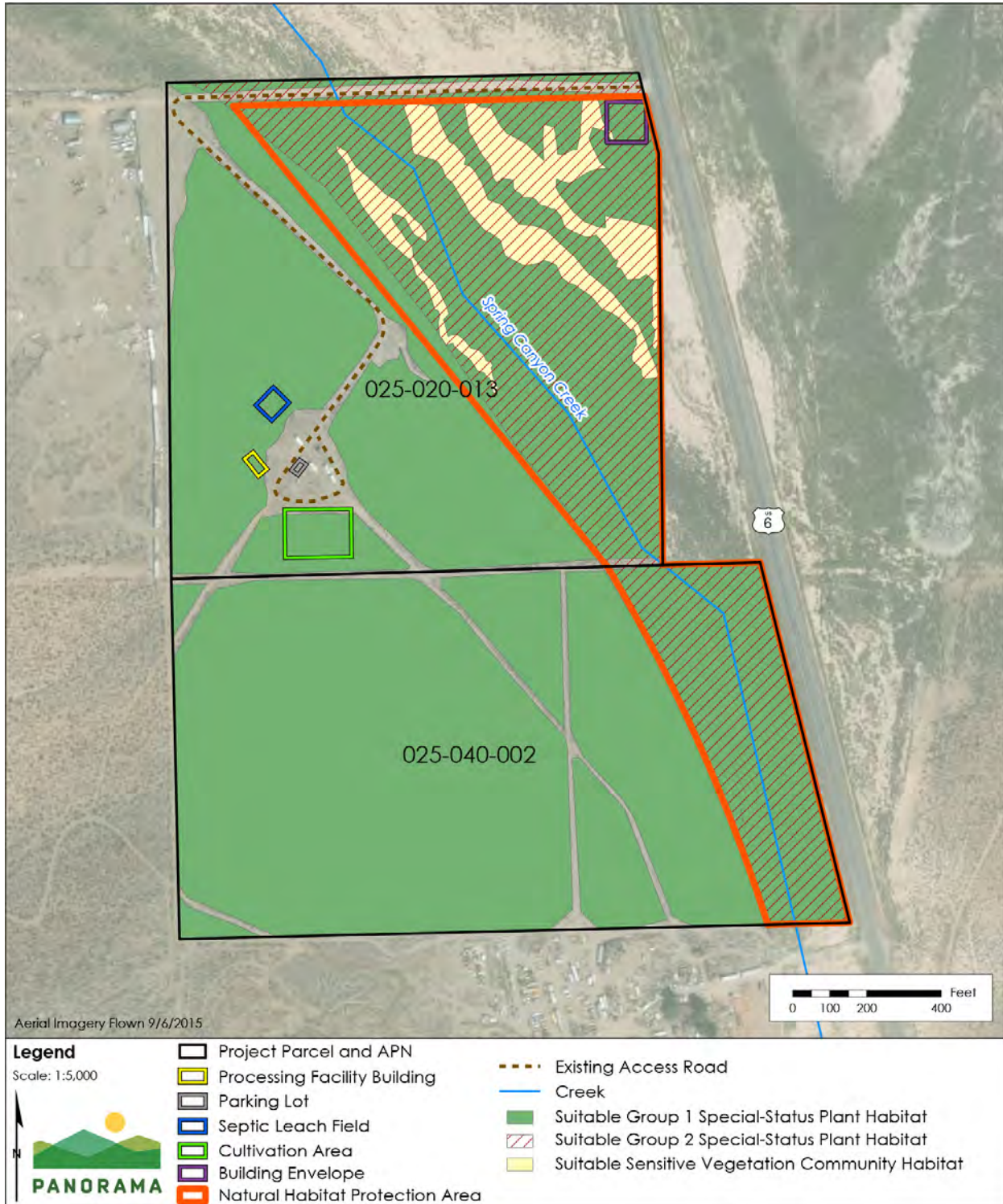
1 BACKGROUND

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 ¹	FESA/CDFW	Blooming Period	Habitat/Range
<i>Ivesia kingii</i> var. <i>kingii</i>	alkali ivesia	Rosaceae	perennial herb	2B.2	None	June-August	Low. 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	Low. 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	Moderate. 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	Moderate. 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	Moderate. 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	Low. 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	Low. 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 ¹	FESA/CDFW	Blooming Period	Habitat/Range
<i>Viola aurea</i>	golden violet	Violaceae	perennial herb	2B.2	None	April-June	Moderate. 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	Low. 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	Low. 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	Low. 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.	Low. 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)	Moderate. 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	Low. Great Basin scrub. Sandy, open flats. Observed at elevations from 1985-2248 meters.

1 BACKGROUND

Scientific Name	Common Name	Family	Lifeform	CRPR ¹	FESA/CDFW	Blooming Period	Habitat/Range
¹ 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)							

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 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

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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- Baldwin, B.G., ed. 2012. *The Jepson Manual: Higher Plants of California 2nd Edition*. University of California Press, Berkeley, CA.
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5 REFERENCES

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- Sawyer, J.O., T. Keeler-Wolf, and J.M Evens. 2009. *A Manual of California Vegetation 2nd Edition*. California Native Plant Society Press. Sacramento, California.
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- Western Regional Climate Center (WWRC) 2020. Western Regional Climate Center Historic Data accessed on March 15, 2020 at: <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca4232>

APPENDICES

APPENDICES

Appendix A	Cumulative Plant List
Appendix B	Photos

APPENDIX A

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.

Scientific Name	Common Name
<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
Boraginaceae	
<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
Brassicaceae	
<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
Cactaceae	
<i>Cylindropuntia echinocarpa</i>	silver cholla
var. <i>rosulata</i>	
<i>Opuntia basilaris</i> var. <i>basilaris</i>	beavertail cactus
Chenopodiaceae	
<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
Cleomaceae	
<i>Cleomella obtusifolia</i>	mojave stinkweed
<i>Peritoma lutea</i>	yellow bee plant
Convolvulaceae	
<i>Cuscuta indecora</i> var. <i>indecora</i>	bigseed dodder
Elaeagnaceae	
<i>Elaeagnus angustifolia</i>	Russian olive
Fabaceae	
<i>Psoralea argemone</i> var. <i>minutifolia</i>	indigo bush
<i>Psoralea polydenia</i>	dotted dalea
Geraniaceae	
<i>Erodium cicutarium</i>	red-stemmed filaree
Lamiaceae	
<i>Salvia columbariae</i>	chia
Loasaceae	

APPENDIX A

<i>Mentzelia albicaulis</i>	whitestem blazing star
Malvaceae	
<i>Sphaeralcea ambigua</i> var. <i>ambigua</i>	globe mallow
Montiaceae	
<i>Calyptridium monandrum</i>	sand cress
Oleaceae	
<i>Menondora spinescens</i> var. <i>spinescens</i>	Spiny menondora
Onagraceae	
<i>Eremothera boothii</i> ssp. <i>desertorum</i>	desert shredding primrose
Papaveraceae	
<i>Argemone munita</i>	flatbud pricklypoppy
<i>Eschscholzia minutiflora</i> ssp. <i>twisselmannii</i>	little gold poppy
Polemoniaceae	
<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
Polygonaceae	
<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
Ranunculaceae	
<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. ^[11]_{SEP} 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

Photos

APPENDIX B



View of big sagebrush (*Artemisia tridentata*).



View of Pinyon rockcress (*Boechera dispar*).



View of Inyo County star-tulip (*Calochortus excavatus*).



View of Wheeler's dune broom (*Chaetadelpa 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

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

PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
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

Mono County Community Development Department

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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.

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

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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

Mono County Community Development Department

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

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.

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Sincerely,

Michael Draper
Planning Analyst
760.924.1805, mdraper@mono.ca.gov

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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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Michael Draper
Planning Analyst
760.924.1805, 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

Mono County Community Development Department

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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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Michael Draper
Planning Analyst
760.924.1805, 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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Michael Draper
Planning Analyst
760.924.1805, mdraper@mono.ca.gov

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commdev@mono.ca.gov

PO Box 8
Bridgeport, CA 93517
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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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Sincerely,

Michael Draper
Planning Analyst
760.924.1805, mdraper@mono.ca.gov

Mono County Community Development Department

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PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
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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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

Mono County Community Development Department

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Bridgeport, CA 93517
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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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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

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

Mono County Community Development Department

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

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

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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

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www.monocounty.ca.gov

May 15, 2021

Chairperson Charlotte Lange
PO Box 237
Lee Vining, CA 93541
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. 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

Attachments:

1. Notice of Preparation

Mono County Community Development Department

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

May 15, 2021

Chairperson Shane Saulque
25669 Highway 6 PMBI
Benton, CA 93512
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. 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,

Michael Draper
Planning Analyst
(760) 924-1805
mdraper@mono.ca.gov

Attachments:

1. Notice of Preparation

Mono County Community Development Department

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
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March 4, 2022

Tina Braitewaite, Chairperson
25669 Hwy. 6, PMB 1
Benton, CA 93512
t.braithwaite@bentonpaiutesreservation.org

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,
APOGEE FAMRS**

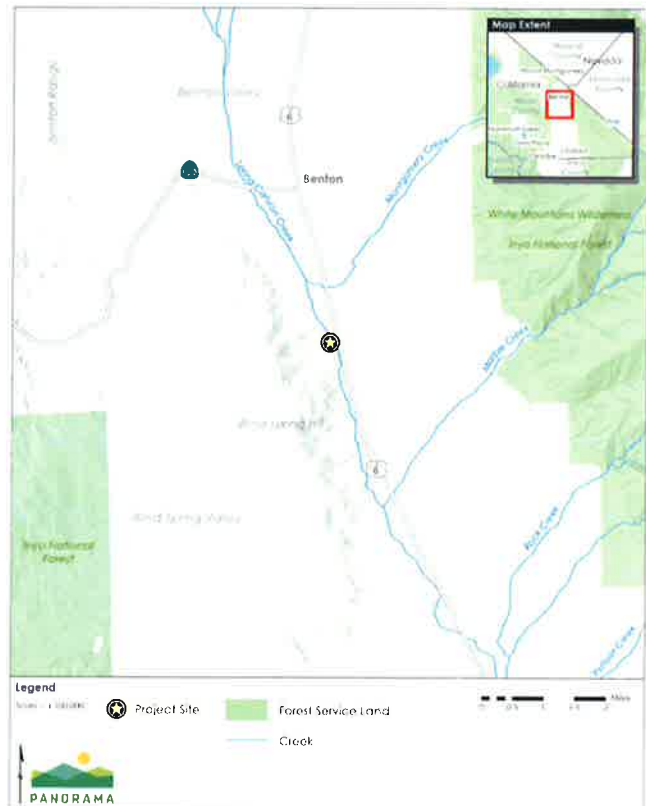
Dear Chairperson Braitewaite,

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.

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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 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

Mono County Community Development Department

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

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Bridgeport, CA 93517
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www.monocounty.ca.gov

March 4, 2022

John Glazier, Chairperson
P.O. Box 37
Bridgeport, CA, 93517
chair@bridgeportindiancolony.com

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,
APOGEE FAMRS**

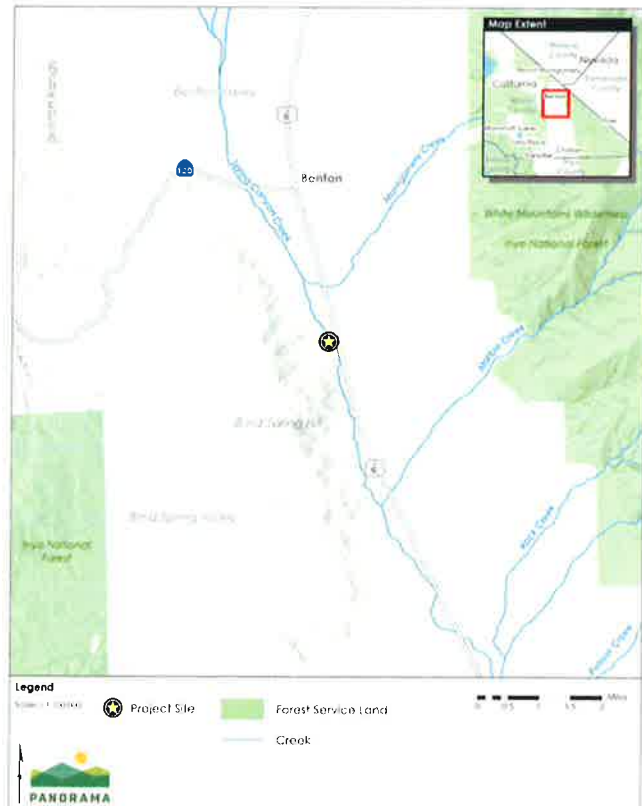
Dear Chairperson Glazier,

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.



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.

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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

Mono County Community Development Department

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

March 4, 2022

Danelle Gutierrez, Tribal Historic Preservation Officer
P.O. Box 700
Big Pine, CA, 93513
d.gutierrez@bigpinepaiute.org

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,
APOGEE FAMRS**

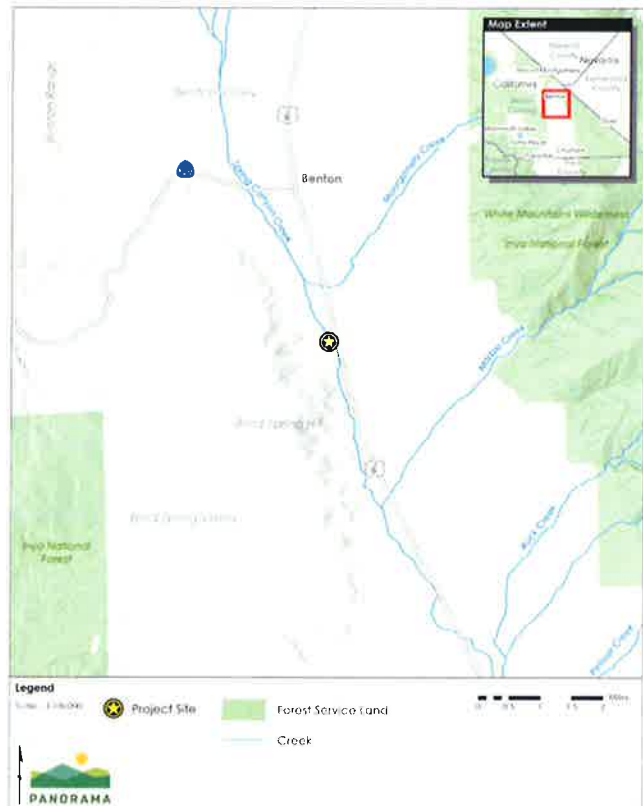
Dear Officer Gutierrez,

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.

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.

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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

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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

Mono County Community Development Department

PO Box 347
Mammoth Lakes, CA 93546
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March 4, 2022

Charlotte Lange, Chairperson
P.O. Box 237
Lee Vining, CA, 93541
chair@monolaketribe.us

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,
APOGEE FAMRS**

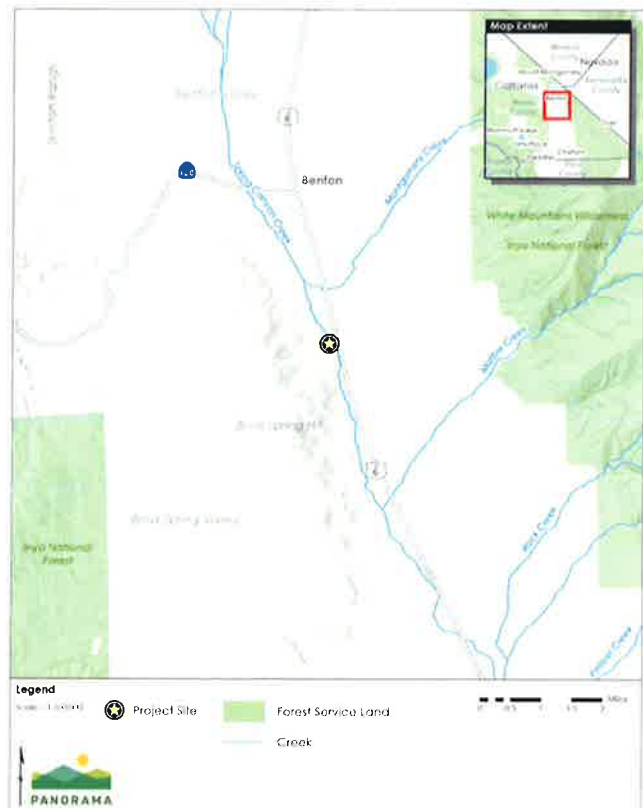
Dear Chairperson Lange,

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.

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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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

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Sincerely,



Michael Draper
Planning Analyst
760.924.1805, mdraper@mono.ca.gov

Mono County Community Development Department

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
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www.monocounty.ca.gov

March 4, 2022

Sally Manning, Environmental Director
P. O. Box 700
Big Pine, CA, 93513
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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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.

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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

Mono County Community Development Department

PO Box 347
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Bridgeport, CA 93517
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www.monocounty.ca.gov

March 4, 2022

Melanie McFalls, Chairperson
P.O. Box 220
Schurz, NV, 89427

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,
APOGEE FAMRS**

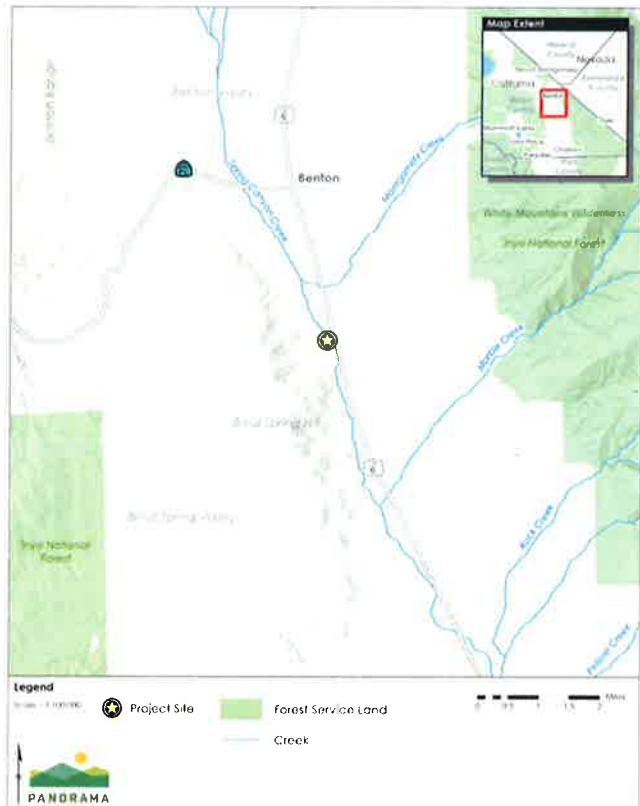
Dear Chairperson McFalls,

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.

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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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

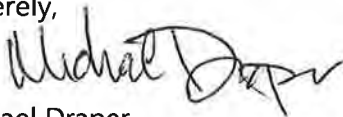
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We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Walker River Reservation. Thank you for taking the time to consider this invitation.

Sincerely,



Michael Draper
Planning Analyst
760.924.1805, mdraper@mono.ca.gov

Mono County Community Development Department

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

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Bridgeport, CA 93517
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www.monocounty.ca.gov

March 4, 2022

James Rambeau, Chairperson
P. O. Box 700
Big Pine, CA, 93513
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.

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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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 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

Mono County Community Development Department

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Mammoth Lakes, CA 93546
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www.monocounty.ca.gov

March 4, 2022

Allen Summers, Chairperson
50 Tu Su Lane
Bishop, CA, 93514

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,
APOGEE FAMRS**

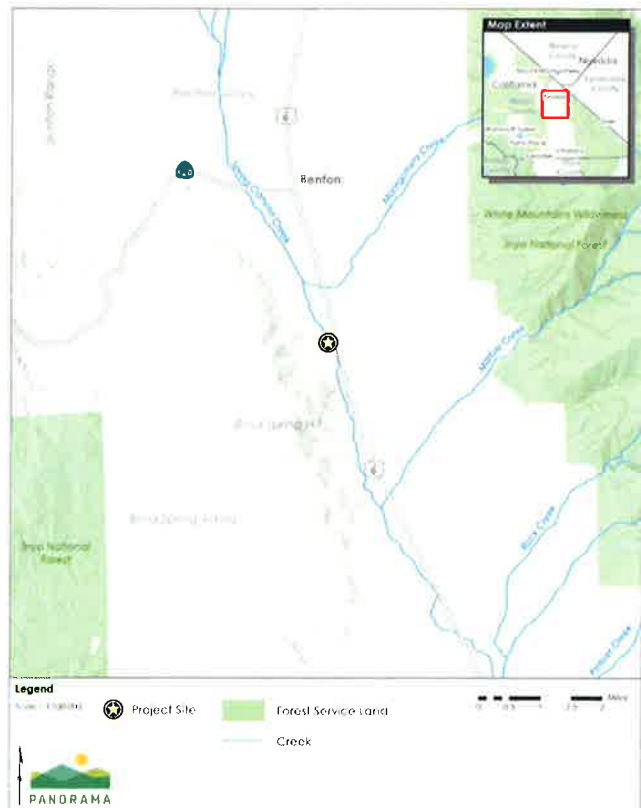
Dear Chairperson Summers,

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 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

Mono County Community Development Department

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commdev@mono.ca.gov

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March 4, 2022

Kenneth Woodrow, Chairperson
1179 Rock Haven Ct.
Salinas, CA, 93906
kwood8934@aol.com

**RE: NATIVE AMERICAN TRIBAL CONSULTATION FOR GENERAL PLAN AMENDMENT,
APOGEE FAMRS**

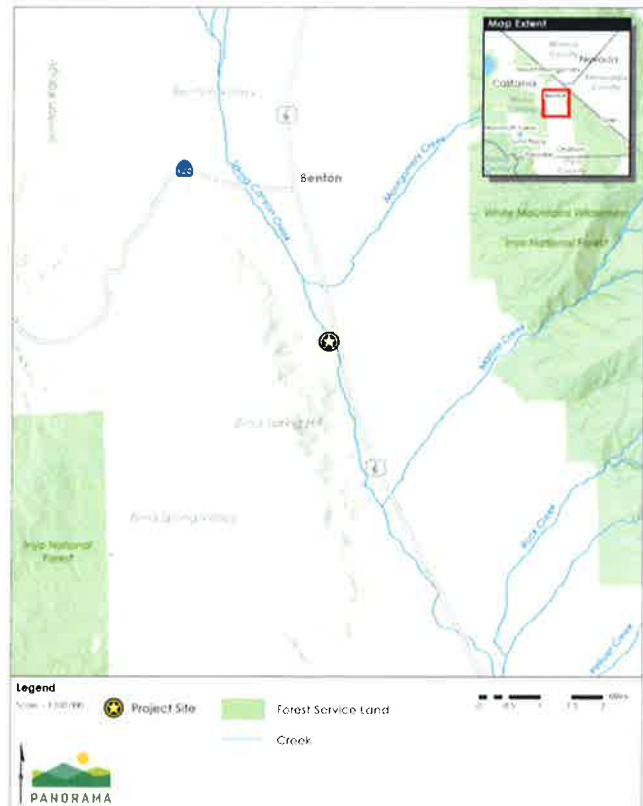
Dear Chairperson Woodrow,

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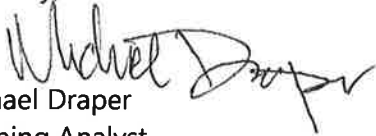
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We look forward to receiving your reply and any information you are able to share and would welcome the opportunity to meet with you and other members of the Wuksache Indian Tribe/Eshom Valley Band. Thank you for taking the time to consider this invitation.

Sincerely,



Michael Draper
Planning Analyst

760.924.1805, mdraper@mono.ca.gov

Appendix E

Responses to Comments

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



Department of
Cannabis Control
CALIFORNIA

Letter A1

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, 2021.¹ 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

¹ 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

Department of Cannabis Control

August 11, 2022 – Comments re Apogee Farms (SCH No. 2021050252) | Page #

- 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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Licensing Division • 2920 Kilgore Road, Rancho Cordova, CA 95670
844-61-CA-DCC (844-612-2322) • info@cannabis.ca.gov • www.cannabis.ca.gov

Business, Consumer Services
and Housing Agency

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. And.. Lighting in the greenhouses would be used only to extend the light cycle for vegging; 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

Department of Cannabis Control

August 11, 2022 – Comments re Apogee Farms (SCH No. 2021050252) | Page 8

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>Mitigation Measure CUL-1: Cultural Resources Preservation and Treatment 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

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Business, Consumer Services
 and Housing Agency

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. 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.

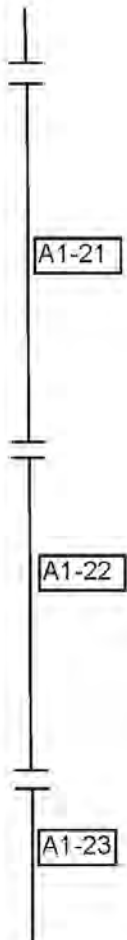
A1-18

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.	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. 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).
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

Department of Cannabis Control

August 11, 2022 – Comments re. Apogee Farms (SCH No. 2021050252) | Page 13

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.

Sincerely,

Rains, Lindsay@Cannabis Digitally signed by Rains, Lindsay@Cannabis
Date: 2022.08.11 15:45:46 -07'00'

Lindsay Rains
Licensing Program Manager

Licensing Division • 2920 Kilgore Road, Rancho Cordova, CA 95670
844-61-CA-DCC (844-612-2322) • info@cannabis.ca.gov • www.cannabis.ca.gov

Business, Consumer Services
and Housing Agency

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 PM₁₀ and PM_{2.5} 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

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.¹

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,

¹ 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

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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”.

A2-1

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

A2-2

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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 ~~strikethrough~~ 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~~

A2-5

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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,

A2-6

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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 ~~strike through~~ 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

APPENDIX E - RESPONSES TO COMMENTS

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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

A2-10

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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 \(ca.gov\)](#). The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: [CNDDDB - Plants and Animals \(ca.gov\)](#).

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.)

A2-12

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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.

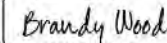
If you should have any questions pertaining to the comments provided in this letter, please contact Corina Jimenez, Environmental Scientist at Corina.Jimenez@wildlife.ca.gov.

A2-13

ATTACHMENTS

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

Sincerely,

DocuSigned by:
 for
AD759253408941E

Alisa Ellsworth
 Environmental Program Manager

ec: Office of Planning and Research, State Clearinghouse, Sacramento
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

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

Biological (BIO) Mitigation Measures (MM)	Implementation Schedule	Responsible Party
MM BIO-1: A preconstruction survey shall be performed prior to construction. The following measures shall be implemented: <ul style="list-style-type: none"> • Use of heavy equipment, grading, demolition, construction, and/or tree removal, shall avoid the nesting season to the greatest extent feasible. • 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 	Prior to initiating Project activities	Project Proponent

A2-16

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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: 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"> • 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 		
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A2-17

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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: 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>	<p>A2-18</p>
<p>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</p>	<p>Prior to initiating Project activities</p>	<p>Project Proponent</p>	<p>A2-19</p>

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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 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.

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

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-__

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 22-01 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
 other incompatible land uses.”

22 The new cannabis operation will be located on the northern parcel leaving the southern parcel as a
 23 buffer between the operation and nearest residential parcel to the south (22889 Hwy 6). The adjacent
 24 property to the west is designated Industrial and contains a single residential unit along with vehicles
 and trailers in various states of disrepair. The cannabis operation will be setback over 300’ from the
 shared property line.

25 C. *The site of proposed change in land use designation is suitable for any of the land uses permitted*
 26 *within the proposed specific plan because:*

27 The site of the proposed change in land use designation is suitable for uses permitted within the
 28 Specific Plan. The use is similar to the adjacent agricultural use and less intense than the adjacent
 29 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 *D. The proposed change in land use designation is reasonable and beneficial at this time because:*

7 The land use designation change will allow the applicant to conduct a commercial cannabis
 8 cultivation operation while maintaining the residential density allowed at the property and avoiding
 9 sensitive habitat. The change of the land use designation is appropriate for conducting a commercial
 10 cannabis operation, as commercial cannabis operations are prohibited in residential designations.
 11 Commercial cannabis is a new industry, approved by the majority of residents in Mono County,
 12 evident by the 2016 statewide election result of Proposition 64, the Adult Use of Marijuana Act,
 13 and affirmed by the Mono County Board of Supervisors in 2017 in approving Resolution R17-88,
 14 initiating and adopting General Plan Amendment (GPA) 17-03/Cannabis, establishing policies
 15 governing commercial cannabis activity.

16 *E. The proposed change in land use designation will not have a substantial adverse effect on
 17 surrounding properties because:*

18 As described in the MND for the project and associated Mitigation Monitoring and Reporting Plan,
 19 impacts to surrounding properties have been reduced to less than significant levels. including
 20 impacts to aesthetics, biological resources, tribal cultural resources, cultural resources, and air
 21 quality. Properties surrounding the project site are sparsely populated, or vacant, or used for
 22 agriculture or storage.

23 Potential direct adverse effects to specific surrounding properties include aesthetics, mitigated by
 24 requiring compliance with General Plan Chapter 23, Dark Sky Regulations, and air quality,
 25 mitigated with odor control measures.

26 **SECTION THREE:** The Planning Commission recommends that the Board of Supervisors adopt
 27 the Apogee Farm Specific Plan, finding in accordance with the California Government Code section 65454,
 28 that the specific plan is consistent with the Mono County General Plan.

29 **SECTION FOUR:** Having reviewed and considered all information and evidence presented,
 30 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
 Regulations, and sufficient parking shall be provided on site for employees and the property
 owner.

- 4 *B. The site for the proposed use relates to streets and highways adequate in width and type to carry*
 5 *the quantity and kind of traffic generated by the proposed use.*

6 The site is able to carry the quantity and kind of traffic generated by the use. The property will not
 7 be open to the public. Vehicle trips will include employees (two) traveling to and from the site,
 8 product distribution vehicles, and the property owner. The project is required to comply with
 requirements of Caltrans District 9, for encroaching U.S. Route 6. Traffic generated by the project
 will not impact the existing transportation corridor.

- 9
 10 *C. The proposed use will not be detrimental to the public welfare or injurious to property or*
 11 *improvements in the area in which the property is located.*

12 The proposed use has been mitigated to minimize impacts to the public, as described in the
 13 Mitigation Monitoring and Reporting Plan (see Attachment C). The cannabis activity will take
 place on the northern parcel. The southern parcel will not be developed and will provide a 1,000'
 14 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
 15 will install a Cannabuster odor elimination system or equivalent. If odors are determined to be a
 nuisance, the County may require modifications to the system.

- 16 *D. The proposed use is consistent with the map and text of this General Plan and any applicable area*
 17 *plan.*

18 The proposed use is consistent with the General Plan and area plans. The Tri-valley is intended to
 19 provide for agricultural operations, similar to the project. The project meets General Plan
 standards and regulations for cannabis activities, as defined in Chapter 13, Commercial Cannabis
 20 Activities.” Compliance with Mono County Code Chapter 5.60, Commercial Cannabis
 Operations, and all County Code and General Plan regulations shall be met.

21
 22 **SECTION FIVE:** Having reviewed and considered all information and evidence presented, including
 public testimony, written comments, Mitigated Negative Declaration and staff report and presentations, the
 23 Planning Commission recommends the Board of Supervisors approve commercial overhead power as part of
 the Apogee Farm Specific Plan, finding that:

24
 25 *In granting a permit for overhead utility lines, the Community Development director (Director) or the*
 26 *Planning Commission (Commission) shall make at least one of the following findings in addition to*
 27 *the required Director Review or Use Permit findings, and shall also require anticipated impacts from*
 28 *all the findings be avoided, minimized, or mitigated to the extent possible:*

- 29
 30 *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*
 31 *wetland areas, or shallow groundwater? If so, above-ground placement may be preferable;*

32 Undergrounding the utility line will require trenching under Spring Canyon Creek and the
 33 surrounding floodplain. The floodplain encompasses Rubber Rabbit Brush Scrub Shrubland
 34 Alliance vegetative communities which occurs as the grade tapers off near the bottom of the
 35 valley, portions of which historically were flooded. This area still accumulates moisture and
 36 supports more facultative species. Above-ground placement is preferred.

- 37 b. *Will overhead placement cause impacts to sensitive species, such as the Bi-State Distinct*
 38 *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 3rd day of October, 2022, by the following vote of the Planning
19 Commission:

20 AYES :

21 NOES :

22 ABSENT :

23 ABSTAIN :

24 _____
25 Patricia Robertson, Chair

26 ATTEST:

27 APPROVED AS TO FORM:

28 _____
29 Heidi Willson
30 Secretary of the Planning Commission

_____ County Counsel

Mono County Community Development Department

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Mammoth Lakes, CA 93546
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October 3, 2022

To: Mono County Planning Commission

From: Michael Draper, Planning Analyst III
Laura Stark, Planning Analyst I

Re: Use Permit 22-005 / Schott-Reedy

RECOMMENDATION

It is recommended the Planning Commission take the following actions:

1. Find that the project qualifies as a Categorical Exemption under CEQA guideline 15303 and instruct staff to file a Notice of Exemption;
2. Make the required findings as contained in the project staff report; and
3. Approve Use Permit 22-005 subject to Conditions of Approval.

PROJECT DESCRIPTION

The project is located at 3858 Crowley Lake Drive (APN 060-150-004) on a parcel designated as Single Family Residential (SFR) (see Figure 1). The project is a request for overhead power on Crowley Lake Drive along the county right-of-way where the proposed overhead powerline would cross two streams before the power lines go underground.

The power line will be underground from the edge of Crowley Lake Drive to the property, following an existing easement before connecting to the owner's recently installed manufactured home (see Figure 2).

The existing easement providing access to the parcel is located on the contiguous northwest property, undeveloped at this time, and designated Mixed Use. The easement contains a dirt/gravel driveway and conduit for underground utilities, installed by the applicant.



Figure 1. Project location.

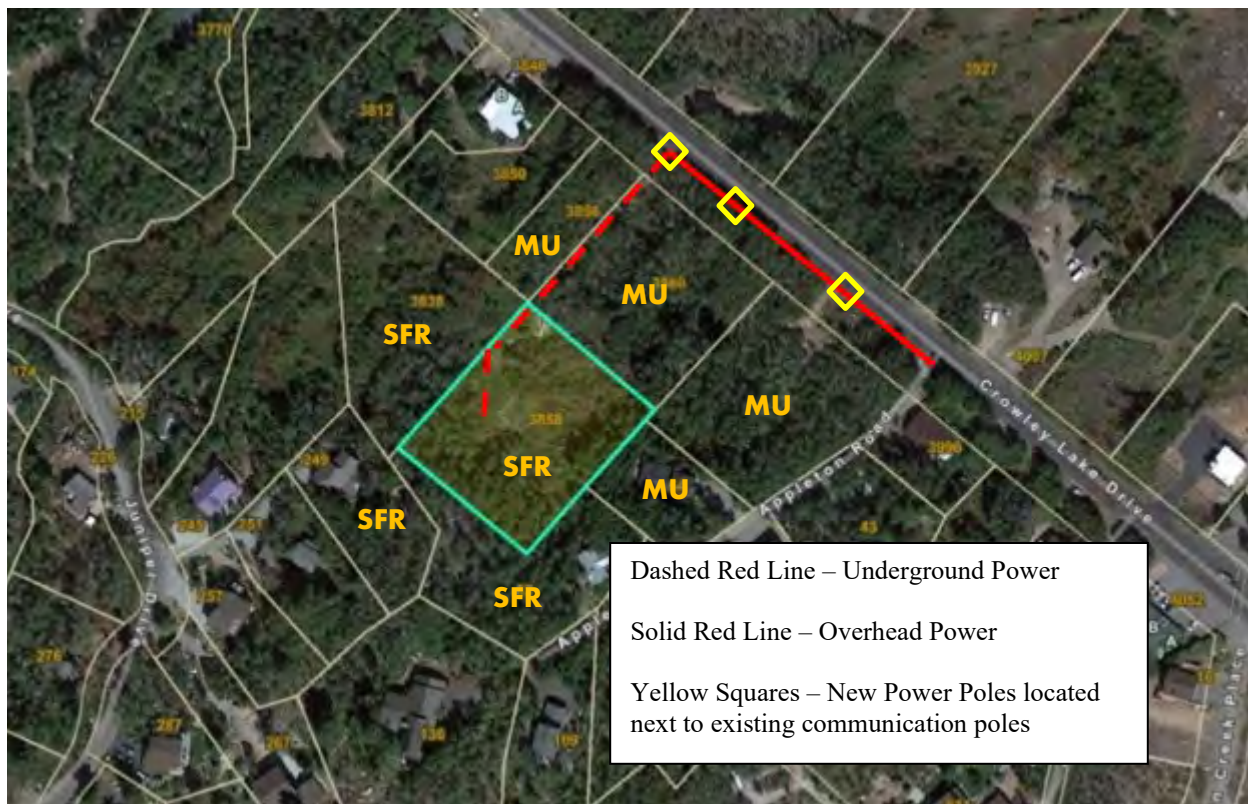


Figure 2. Proposed overhead power line and pole alignment.

The property is 1.04 acres and surrounding contiguous parcels are a combination of developed and undeveloped properties designated as either SFR or Mixed Use (MU). The adjacent parcel located to the north is undeveloped and designated MU. The property to the northwest is undeveloped and designated SFR. The parcel to the south is developed and designated SFR; the parcel to the southeast contains a single-family residence and is designated MU; and the parcel adjacent to the southeast corner is undeveloped and designated MU.

Section 11.010 of the Mono County General Plan, Land Use Element (MCGP LUE) requires utility lines to be undergrounded to an individual development but allows for overhead lines subject to a Director Review permit if at least one of four findings can be made.

BACKGROUND

The property currently contains a 120-sf shed and manufactured home. Use Permit 20-006 was approved for the property, allowing the applicants to construct a shed prior to the main use. Building Permit 21-311 was then approved for the installation of a manufactured home. Subsequently, the owners applied for, and received, Director Review Permit 22-004 to place a recreational vehicle on the property to support construction of the primary residence. (See Attachment 1). This project was elevated from a Director Review to Use Permit when neighbors expressed concern about the potential fire danger resulting from overhead power.

All conditions of the Use Permit, Building Permit, and Director Review Permit have been fulfilled, and the last step in finaling the Building Permit is to complete the electrical connection, Underground conduit has been placed from the manufactured home, through the access easement

to Crowley Lake Drive, in anticipation of undergrounding the utility. However, the recorded access easement for the property does not include language allowing the use of the easement for utilities and must be amended to allow the use of the easement for utilities (see Condition of Approval #1).

DISCUSSION

The applicant is asking for the approval of overhead power in the County right of way along Crowley Lake Drive. Underground installation would disturb two seasonal waterways and cost approximately three times more than overhead power which would cause financial hardship for the applicants. The overhead placement will entail use of three new utility poles, installed by Southern California Edison (SCE). Separately owned poles exist in the right of way which are owned and operated by the communication utilities. SCE will offer the communication utilities interest in the new poles, but they are not obligated to attach to them, or remove the old poles. See Attachment 4 for an enlarged site plan.

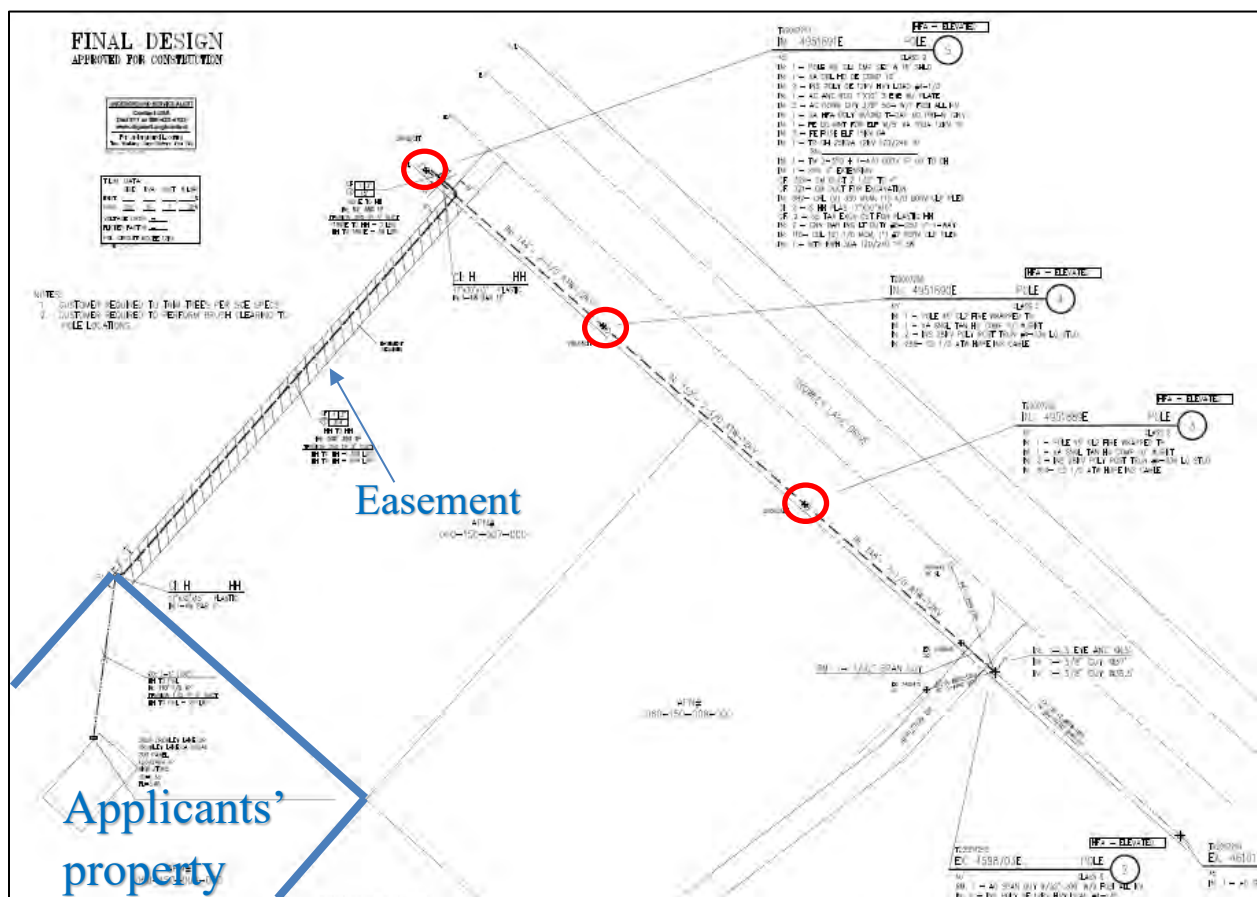


Figure 3. Location of new poles.

In granting a permit for overhead utility lines, the Planning Commission shall make at least one of the following findings from MCGP LUE Ch. 11 in addition to the required 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:*

a. *In areas without a number of existing overhead lines in the immediate vicinity, would overhead lines create the potential for a significant cumulative visual impact; i.e., would allowing an overhead line be likely to result in future requests for additional overhead lines in the area? If so, it may be determined that an overhead line will have a significant impact on the visual character of the area.*

Overhead power lines would run adjacent to existing communication lines, and SCE will allow the communication company to co-locate their lines onto the new poles. The area is currently impacted by the existing communication lines, therefore the proposed line will not add a significant visual impact. Future development of parcels in this area may benefit for this project. See Attachment 3 for additional photos of the area.



Figure 4. Site photo.

b. *Does the topography or vegetation in the area effectively screen the proposed lines? If so, then an additional line may not significantly disrupt the visual character of the area.*

New overhead powerlines are proposed to be adjacent to existing communication lines, which are screened within the dense vegetation of the area. Installation and maintenance of the power lines will result in the removal of vegetation within 12' of the power poles so the poles will be more visible. However, undergrounding the utilities would require more extensive removal of vegetation and thus would more significantly affect the visual character of the area; therefore the proposal for overhead power will better protect the visual character of the area.

c. *Are there other potential alignments that would have less visual impact?*

No

d. *Does the project reduce the overall number of overhead lines and poles in the area; are the lines co-located with existing facilities; and/or do design features such as height of lines, size, color, reflectivity, tension in line, or other features reduce visual impacts? If so, it may be determined that an overhead line will not have a significant impact on the visual character of the area.*

Overhead power lines are planned to be adjacent to the existing communication lines and will not have a significant impact on the visual character of the area. Three new poles which will be wood or patina to blend with the surroundings will be

added to the alignment and the communication company will have the option to co-locate their lines onto the new poles.

The Director or the Commission may consider additional information pertaining to the visual character of the area that is deemed relevant to the application.

2. *The placement of utility lines above ground is environmentally preferable to underground placement and does not create public health and safety impacts. In making this determination, the Director or the Commission shall consider the following:*

a. *Will underground placement disturb an environmentally sensitive area, including but not limited 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;*

Yes, underground placement would disturb habitat in the area. The area contains seasonal runoff, moist soils and a grove of Aspen trees thus overhead placement is preferable.

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 placement may not be preferable, or perch deterrents and other mitigations may be required (see policies in the Conservation/Open Space Element);*

The area does not contain Sage-Grouse habitat.

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 placement will disturb seasonal waterways; therefore, above ground placement is preferable.

d. *Will underground placement increase the utility line's exposure to environmental hazards, such as flood hazards, fault hazards or liquefaction? If so, above-ground placement may be preferable;*

Yes, underground placement requires disturbing seasonal waterways and may increase exposure to flood hazards; therefore, above ground placement is preferable.

e. *Are there other potential alignments that would avoid potential environmental impacts?;*
No.

f. *Are there adequate provisions for long-term maintenance and fire-hazard mitigation? If so, above-ground placement may be acceptable.*

The overhead power lines will be maintained by Southern California Edison (SCE) in compliance with their standards for reducing fire mitigation. SCE provides vegetation clearance 12' from a power line.

The Director or the Commission may consider additional information pertaining to the environmental sensitivity of the area that is deemed relevant to the application.

3. *The installation of underground utilities would create an unreasonable financial hardship on the applicant due to the unique physical characteristics of the property. In making this determination, the Director or the Commission shall consider the following:*

a. Is the cost of the line to be installed excessive?

Expense to install underground power is approximately three times more than overhead power and will cost property owners \$45,000 more than overhead power. The cost for underground power would reflect 35-40% of the total project cost; while overhead power would only reflect about 16% of the total project cost.

b. Will the installation of underground utilities require trenching under a stream bed?

Underground utilities would require trenching in an area that is affected by seasonal run-off and occasional flooding.

c. Will the installation of underground utilities require unreasonable trenching or blasting through rock?

Yes, it will require trenching through moist soils that flood seasonally.

d. Are there alternate alignments that would eliminate or significantly lessen the financial hardship? The Director or the Commission may consider other site specific financial hardships deemed relevant to the application.

No.

4. *The exclusive purpose of the overhead line is to serve an agricultural operation.*

For the purposes of this section, agricultural operations are defined as use of the land for the production of food and fiber, including the growing of crops and grazing of livestock. Above-ground utility lines may be permitted for agricultural uses such as pumps and similar uses.

a. Impacts to sensitive species, such as the Bi-State Distinct Population Segment of Greater SageGrouse shall be avoided, minimized, or mitigated consistent with policies in the Conservation/Open Space Element.

Not Applicable.

Therefore findings 1, 2 and 3 can be made in support of authorizing overhead power in this location. Only one finding is required.

USE PERMIT FINDINGS

MCGP LUE - Section 32.010, Required Findings:

Use permits may be granted by the Planning Commission only when all of the following findings can be made in the affirmative:

1. *All applicable provisions of the Mono County General Plan 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 because:*

The General Plan Land Use Designation for this property is Single Family Residential (SFR). According to the Mono County General Plan, the SFR designation is intended to provide for the development of single-family dwelling units in community areas. To install overhead power, at least one finding is required to be made, per MCGP Chapter 11.D. This use permit is proposed under the finding for financial hardship as well as the finding that

overhead power is preferable to avoid disturbing two stream beds. These findings are discussed in further detail in the previous section of this report. Use Permit Finding #1 can be made in the affirmative.

2. *The site for the proposed use related to streets and highways is adequate in width and type to carry the quantity and kind of traffic generated by the proposed use because:*

The lines will be adjacent to existing communication lines existing in the area adjacent to the road. The existing lines do not obstruct the roadway and new lines are not anticipated to generate a new obstruction. The site is adequate in width and type to support the use and would not disrupt traffic or existing uses of the County right-of-way. Lines will not cross Crowley Lake Drive; therefore Use Permit Finding #2 can be made in the affirmative.

3. *The proposed use will not be detrimental to the public welfare or injurious to property or improvements in the area on which the property is located because:*

Installation of overhead power lines spanning 445' in the County Right-of-Way along Crowley Lake Drive will not disrupt traffic or existing uses as evident by the existing overhead communication lines. Installation of overhead power for the short section along the road prevents the disturbance of seasonal runoff, moist soils and an Aspen tree grove. After this section, power will be undergrounded across the private properties. Three new power poles will be installed and co-located with the existing communication infrastructure. Communication utilities will be offered interest in using the new poles, but they are not obligated to attach to them or remove the old poles. SCE will be responsible for maintaining the vegetation around the poles for fire safety; therefore the proposed addition of overhead powerlines in the County Right-of-Way would be considered consistent with typical use in the area and Use Permit Finding #3 can be made in the affirmative.

4. *The proposed use is consistent with the map and text of the Mono County General Plan because:*

The General Plan Land Use Designation for this property is Single Family Residential (SFR). According to the Mono County General Plan, the SFR designation is intended to provide for the development of single-family dwelling units in community areas; therefore Use Permit finding #4 can be made in the affirmative.

The General Plan provides a means to allow overhead power through the permitting process. Findings to allow the use can be met, as stated above.

COMMENTS RECEIVED

Two comments were received in opposition of the project and presented at LDTAC when accepting the application for processing. Concerns were primarily related to potential fire danger from overhead power lines; however it was not clear to at least one opponent that power would be underground on the property and the only overhead power would be in the County Right-of-Way along Crowley Lake Drive. There was also a concern from that opponent about when the shed on the property would be completed. The project proponent advised that they completed the shed on September 2, 2022.

At the September 19, 2022, LDTAC meeting, the Long Valley Fire Department Chief provided written comments in opposition to the project. They would like the applicant to continue

undergrounding services rather than allowing the above-head power poles, due to fire threat. An adjacent neighbor also spoke in opposition to the project. She is concerned the addition of three new power poles will increase risk of wildfire in the area.

Response: While wildfire is a concern for communities, SCE has implemented and established new procedures to maintain the safety of overhead lines which mitigates the risk of wildfire, including vegetation clearance, public safety power shutoffs, and additional system measures as detailed in their wildfire safety planning.

Notice of the project was mailed to property owners within 300' feet of the site on September 21, 2022, and noticed in the newspaper, The Mammoth Times, on September 22, at least 10-days prior to the hearing. See Attachment 2 for public comments on the project.

CEQA COMPLIANCE

This project may be categorically exempt from CEQA because it meets the conditions of CEQA Guideline 15303(d).

15303 (d). New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:

(d) Water main, sewage, electrical, gas and other utility extensions including street improvements, of reasonable length to serve such construction.

The project is a utility extension to serve the construction of a new structure; therefore it meets the criteria of 15303(d) for categorial CEQA exemption.

Attachments:

Attachment 1. Existing Land Use Entitlements

Attachment 2. Public Comment

Attachment 3. Area Photographs

Attachment 4. Site Plan

CONDITIONS OF APPROVAL
Use Permit 22-005 /Schott-Reedy

- 1) Document #2008003488, recorded legal description of the existing easement, shall be modified to include language allowing the use of the easement for utilities.
- 2) A survey shall be performed to clearly identify the applicant's access easement boundary, private property boundaries, easements held by Hilton Creek Community Services District, and the County Right-of-Way. If additional easements are necessary, the applicant shall be responsible for obtaining legal access through properties for the purpose of access and utilities.
- 3) Future development shall meet requirements of the Mono County General Plan, Mono County Code, and project conditions.
- 4) All exterior lighting shall be shielded and directed downward to comply with Chapter 23, Dark Sky Regulations.
- 5) The property is required to be in compliance with all applicable conditions of approval from previously approved Director Review Permits and Use Permits.
- 6) Project is required to comply with any requirements of the Long Valley Fire Protection District.
- 7) Project shall comply with all Mono County Building Division, Public Works, and Environmental Health requirements.
- 8) The use of the RV as a residence shall be discontinued after construction of the residence. If there is a demonstrated need, the Director Review Permit may be renewed for one year following application submittal and noticed to contiguous property owners.
- 9) If the trailer is to remain on the site following construction of the residence, it must be disconnected from utilities, be in operable condition, and remain vacant when parked on the property.
- 10) Appeal. The Director Review permit shall become effective 10 days following the issuance of the Director's decision. During the 10-day period, an appeal may be filed in accordance with Chapter 47. If an appeal is filed, the permit will not be issued until the appeal is considered and a decision is rendered by the Planning Commission. (Section.31.060)
- 11) Termination. A Director Review 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:
 - 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. Exercise of rights shall mean substantial construction or physical alteration of property in reliance with the terms of the Director Review. B.
 - B. There is discontinuance for a continuous period of one year, as determined by the Director, of the exercise of the rights granted.

C. No extension is granted as provided in Section 31.080.

- 12) Extension: If there is a failure to exercise the rights of the Director Review within one year of the date of approval, the applicant may apply for an extension for an additional one year. 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. Conditions of Approval for the Director Review may be modified or expanded, including revision of the proposal, if deemed necessary. The Planning Division may also deny the request for extension. Exception to this provision is permitted for those Director Reviews approved concurrently with a tentative parcel or tract map; in those cases the approval period(s) shall be the same as for the tentative map.
- 13) Revocation: The Planning Commission may revoke the rights granted by a Director Review, 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 Director Review or the violation by the owner or tenant of any provision pertaining to the premises for which such Director Review was granted. Before revocation of any permit, the commission shall hold a hearing thereon after giving written notice thereof to the permitted 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 Community Development Department

P.O. Box 347
Mammoth Lakes, CA 93546
(760) 924-1800, fax 924-1801
commdev@mono.ca.gov

P.O. Box 8
Bridgeport, CA 93517
(760) 932-5420
www.monocounty.ca.gov

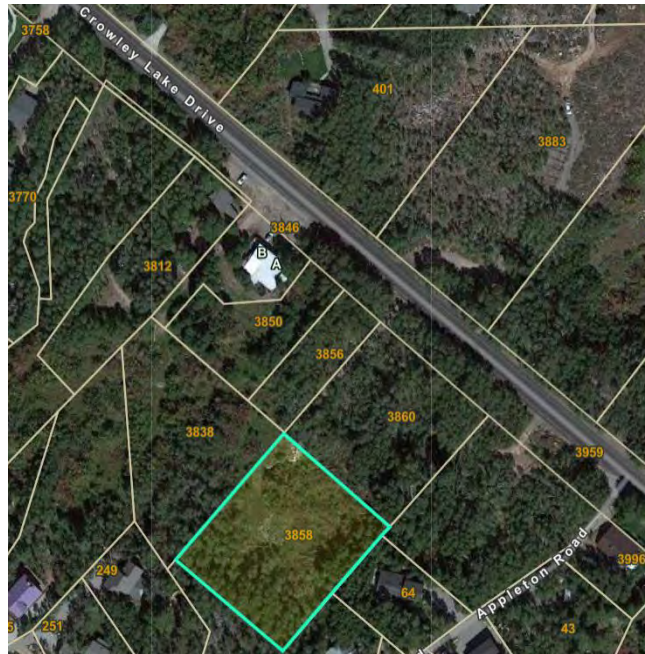
NOTICE OF DECISION Director Review 22-004/Reedy & Schott

Applicants: Melanie Reedy & Matthew Schott

Subject Property:
3858 Crowley Lake Drive, Crowley Lake
APN 060-150-004

Proposal: Residential use of an RV during construction of permanent residence.

Pursuant to the Mono County General Plan, Chapter 31 Director Review Procedures, and Chapter 04.040 and based upon the following findings, you are hereby notified that Director's Review 22-004 has been:



- Granted as requested.
 Granted subject to the attached Conditions of Approval.
 Denied.

BACKGROUND

Approval of an accessory use (116-square foot storage shed) was approved prior to a main use via Use Permit 20-006 on February 18, 2021. The 116-square foot shed was exempt from a building permit and the subject of a formal complaint filed with Mono County Code Compliance for an accessory use prior to the main. A Notice of Violation was issued in 2020 and to abate the violation, the property owners were advised to submit a Use Permit application for the non-compliant accessory use. A condition of approval of UP 20-006 required the property owners to submit a Building Permit application for the main residential use within two-years of the decision date. A building permit application for placement of a manufactured home was submitted on November 19, 2021, and a building permit was issued on February 3, 2022.

PROJECT DESCRIPTION

The proposal is for the residential use of a Recreational Vehicle (RV) during the construction of a single-family residence at 3858 Crowley Lake Drive, Crowley Lake (APN 060-150-004). The parcel is over an acre (~1.04) in size and is designated for Single Family Residential (SFR). The RV will be occupied on site during placement of a manufactured home under building permit B21-311 (Attachment 1 – Site Plan). The property will be served by an onsite well and Hilton Creek Community Services District will provide a sewer connection. During RV placement and construction of the main residence, the property owners intend to utilize an offsite domestic

water supply to fill the RV's potable water tank and the RV dump station in Tom's Place for waste water disposal.

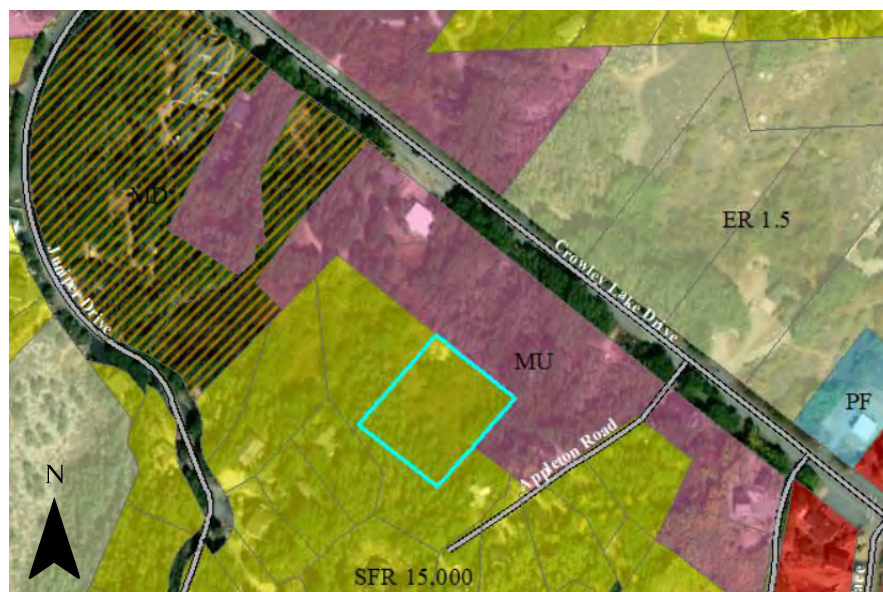
The RV is a 24.4' x 8.4' 2004 Four Winds RV (see Photo 1). This parcel is not governed by local CC&R's. The applicant intends to occupy the unit during construction of the primary residential use on this property. Mono County General Plan (MCGP), Land Use Element, Chapter 04, Section 04.040 allows for placement and residential use of an RV for up to a year, subject to Director Review permit.

The project parcel is surrounded by SFR-designated parcels to the south and west and Mixed Use (MU) parcels to the north and east (see Figure 1).

PHOTO 1 – 2004 FOUR WINDS RV



FIGURE 1 – LAND USE DESIGNATIONS



LAND DEVELOPMENT TECHNICAL ADVISORY COMMITTEE (LDTAC)

The LDTAC reviewed and approved the application for processing on December 20, 2021. The draft conditions of approval for this project were reviewed and approved by LDTAC on February 23, 2022. During the discussion of this item, LDTAC members suggested that a condition of approval be added requiring the property owners to finish the shed prior to RV placement. Environmental Health requested language be added to the water and sewage disposal condition of approval to better reflect the applicant's proposed methods of obtaining potable water and disposing of sewage.

One public comment opposed to the project was received prior to the LDTAC meeting concerned with the property being out of compliance with Use Permit 20-006 (Attachment 2). The commenter indicated that the storage shed approved under that Use Permit had not been finished and requested that no additional approvals be granted until the property is in full compliance with the pervious permit.

The property owners indicated that most of the conditions of approval for Use Permit 20-006 have been complied with, including securing the shed from unauthorized entry; that no flammable liquids/materials were being stored in the shed; removal of dead or dying tree branches adjacent to or overhanging the storage shed as well as any leaves, needles, or other vegetative growth on the roof of the shed during non-snow months; received a letter from Lahontan Regional Water Quality Control Board indicating a permit was not required (Attachment 3); the U.S. Army Corps of Engineers and California Department of Fish and Wildlife also found that approvals/permits were not required (Attachments 4 & 5); and obtaining a building permit for a residence within two-years of the approval of UP 20-006 (B21-311 issued February 3, 2022). Further the property owners explained that they did not complete construction of the storage shed (see Site Photo 1, the roof and siding need to be completed) because they wanted to obtain their building permit prior to resuming construction activities on the parcel.

SITE PHOTO 1 – STORAGE SHED 09/30/2020



DIRECTOR REVIEW FINDINGS

Under MCGP Chapter 31.030, the Community Development Director may issue a Director Review permit after making findings regarding required factors. The following factors and associated findings apply to DR 22-004:

1. *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 proposed use of the RV during construction will not limit or alter the eventual primary use of a single-family residence. The property is adequate in size to accommodate the 24.4' RV and the footprint for the main residence while maintaining setbacks and parking (see Attachment 1- Site Plan). Conditions of approval require that upon completion of the main residence, the RV use will cease.

2. *The site for the proposed use relates to streets and highways adequate in width and type to carry the quantity and kind of traffic generated by the proposed use.*

The existing access and traffic along Crowley Lake Drive will not be impacted by the placement and temporary residential use of the trailer, as the impacts will be like that of a single-family residence. Traffic generation will be similar to a typical single-family residential property under construction.

3. *The proposed use will not be detrimental to the public welfare or injurious to property or improvements in the area in which the property is located.*

The proposed RV placement is setback from front, side, and rear property lines in conformance with SFR setback standards. The property is located in an aspen stand and is hidden behind another parcel that fronts Crowley Lake Drive so the RV will not create any visual impacts along Crowley Lake Drive. Project conditions constrain the residential use to the RV unit, and minimize associated residential RV activity, noise and night light impacts to surrounding properties.

4. *The proposed use is consistent with the map and text of the Mono County General Plan.*

The use of the RV during construction of the main residence is permitted for up to one year. The residential use is consistent with the single-family residential land use designation of the MCGP. The standard conditions of section 04.040 of the MCGP for temporary RV placement have been incorporated as project conditions.

5. *The improvements indicated on the development plan are consistent with all adopted standards and policies as set forth in the Land Development Regulations, this General Plan and any applicable area plan.*

The use of an RV during construction is an allowable use subject to a Director Review under section 04.040 A3 of the MCGP. Required factors have been considered and applicable regulations applied in project conditions.

6. *The project is exempt from the California Environmental Quality Act (CEQA).*

The proposed RV uses qualifies for a Class 4 Categorical Exemption – Minor Alterations to Land (15304 (e)): Minor temporary use of land having negligible or no permanent effects on the environment, including carnivals, sales of Christmas trees, vehicle storage, etc.

ATTACHMENTS

- Attachment 1: Site Plan
- Attachment 2: Public Comment (Opposed)
- Attachment 3: Lahontan Regional Water Quality Control Board Letter
- Attachment 4: U.S. Army Corps of Engineers Letter
- Attachment 5: California Department of Fish and Wildlife Letter

CONDITIONS OF APPROVAL

DR 22-004 is issued with the following conditions:

1. Environmental Health Department shall review and approve sanitation methods for the RV use, in this case obtaining drinking water from an approved potable source and disposing of the RV's wastewater tanks, as needed, at an approved RV dump station, such as the USFS dump station at Tom's Place or at the MCWD RV dump station.
2. RV placement shall not occur until construction of the storage shed is completed.
3. The applicant shall obtain a building permit for the primary building, and any necessary permits for the RV use, such as a temporary building permit for electrical hookup, prior to RV placement.
4. The use of the RV as a residence, limited to one year per Chapter 04.040, shall be discontinued after construction of the residence. If there is a demonstrated need, the Director Review may be renewed for one year following application submittal and notice to contiguous property owners.
5. The RV shall be placed in a manner that minimizes visual impact to nearby properties. The property shall be maintained in a neat and orderly fashion during construction of the residence.
6. If the trailer is to remain on the site following construction of the residence, it must be disconnected from utilities, be in operable condition, and remain vacant when parked on the property.
7. The RV shall be placed in a manner and the property maintained in a fashion that minimizes noise and residential activity impacts to neighboring residences. Residential uses shall be contained in the RV, outside camping activities such as a campfire are prohibited, and use of night lighting on and outside the trailer shall be minimized, in accordance with Mono County Dark Sky regulations (Chapter 23 of the Mono County General Plan).
8. All applicable conditions of approval contained in Use Permit 20-006 shall apply.
9. Any future accessory dwelling unit on the property shall obtain necessary planning permits prior to construction of the second unit.
10. Appeal. The Director Review permit shall become effective 10 days following the issuance of the Director's decision. During the 10-day period, an appeal may be filed in accordance with Chapter 47. If an appeal is filed, the permit will not be issued until the appeal is considered and a decision is rendered by the Planning Commission. (Section.31.060)
11. Termination. A Director Review 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:
 - 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. Exercise of rights

shall mean substantial construction or physical alteration of property in reliance with the terms of the Director Review.

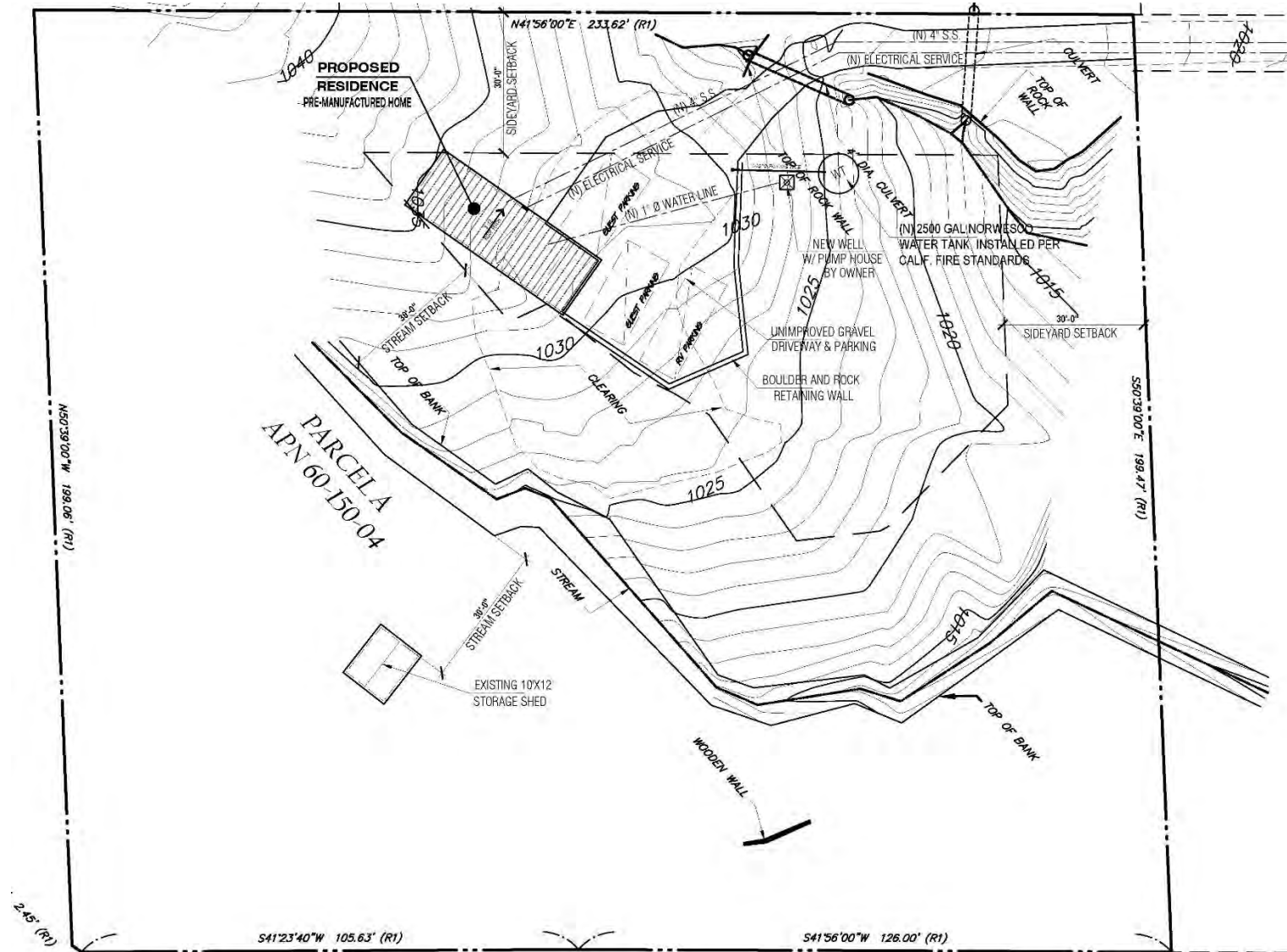
- B. There is discontinuance for a continuous period of one year, as determined by the Director, of the exercise of the rights granted.
 - C. No extension is granted as provided in Section 31.080.
12. Extension: If there is a failure to exercise the rights of the Director Review within one year of the date of approval, the applicant may apply for an extension for an additional one year. 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. Conditions of Approval for the Director Review may be modified or expanded, including revision of the proposal, if deemed necessary. The Planning Division may also deny the request for extension. Exception to this provision is permitted for those Director Reviews approved concurrently with a tentative parcel or tract map; in those cases the approval period(s) shall be the same as for the tentative map.
13. Revocation: The Planning Commission may revoke the rights granted by a Director Review, 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 Director Review or the violation by the owner or tenant of any provision pertaining to the premises for which such Director Review was granted. Before revocation of any permit, the commission shall hold a hearing thereon after giving written notice thereof to the permitted 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.

This Director Review Permit shall become effective fifteen (15) days following the issuance of the Director's decision. This decision may be appealed within ten (10) days by filing a written notice of appeal with the Secretary of the Planning Commission. If an appeal is filed, the permit will not be issued until the appeal is considered and a decision is rendered by the Planning Commission.

PREPARED BY: Kelly Karl, Associate Planner DATE OF DECISION: _____

SIGNED: _____
Wendy Sugimura, Community Development Director

ATTACHMENT 1 – SITE PLAN



ATTACHMENT 2 – PUBLIC COMMENT (OPPOSED)

From: Sharon Shaw <sshaw3243@gmail.com>
Sent: Friday, February 18, 2022 10:08 AM
To: Wendy Sugimura <wsugimura@mono.ca.gov>
Cc: Rhonda Duggan <rduggan@mono.ca.gov>
Subject: LDTAC Special Meeting Wed 2/23 at 1:30 p.m. Reedy/Schott Matter

[EXTERNAL EMAIL]

Hello Wendy,

My name is Sharon Shaw and I live next door to the Reedy/Schott property. I attended the original Planning Commission Meeting held virtually in this matter. I see that they are applying to have an RV placed on their property during construction. My issue with them being given this permission is their failure to comply with the Planning Commissions original request of finishing the unsightly shed that should never have been build to start with.

When Ms. Reedy originally came on our property to introduce herself when they purchased the property several years ago, she indicated at the time that they had purchased the property to have their RV on it in the nice months of the year. This appears to be exactly what they hope to gain by this request. I do appreciate the no campfire requirement noted in the conditions set forth if the request is granted. I really think they should have to comply with the original conditions before they are granted additional concessions and that they should be required to have a building permit issued before being allowed to park an RV on the property.

I will be traveling at the time of the Wednesday meeting and will attempt to call in but would appreciate this email being included in the packet regarding the director review in case I am unable to call in.

Thank you

Sharon Shaw

ATTACHMENT 3 – LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD LETTER

From: [Melanie Reedy](#)
To: [Kelly Karl](#)
Subject: Fw: SPL-2021-00225 (3858 Crowley Lake Drive SFR)
Date: Friday, April 9, 2021 4:58:56 PM

[EXTERNAL EMAIL]

----- Forwarded Message -----

From: "Steinert, Tiffany@Waterboards" <Tiffany.Steinert@Waterboards.ca.gov>
To: "melanietravels@yahoo.com" <melanietravels@yahoo.com>
Cc: "Marquez, Alyssa@Wildlife" <Alyssa.Marquez@Wildlife.ca.gov>, "Zimmerman, Jan@Waterboards" <jan.zimmerman@waterboards.ca.gov>, "Gerardo.L.Hidalgo@usace.army.mil" <Gerardo.L.Hidalgo@usace.army.mil>
Sent: Fri, Apr 9, 2021 at 4:41 PM
Subject: RE: SPL-2021-00225 (3858 Crowley Lake Drive SFR)

Hi Melanie,

After the virtual site visit conducted on April 8, 2021, the Water Board has determined that a 401 Water Quality Certification is not required as long as all construction remains within the existing development footprint at 3858 Crowley Lake Road.

Please feel free to contact me if you have any questions.

Tiffany Steinert
 Engineering Geologist

Regional Water Quality Control Board - Lahontan Region 6
 15095 Amargosa Road – Bldg 2, Ste 210
 Victorville, CA 92394
 Direct (760) 241-7305
 Front desk (760) 241-6583
 Fax (760) 241-7308

The majority of Lahontan Water Board staff are teleworking due to an Executive Order from Governor Newsom. However, we are available via email and voicemail. We are responding to emails throughout the workday. Responses to voicemail may take more than one business day.

ATTACHMENT 4 – U.S. ARMY CORPS OF ENGINEERS LETTER

From: Hidalgo, Gerardo L CIV USARMY CESPL (USA) <Gerardo.L.Hidalgo@usace.army.mil> **Sent:** Friday, April 9, 2021 4:30 PM
To: melanietravels@yahoo.com
Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Marquez, Alyssa@Wildlife <Alyssa.Marquez@Wildlife.ca.gov>
Subject: SPL-2021-00225 (3858 Crowley Lake Drive SFR)

EXTERNAL:

Ms. Reedy,

After a review of our records, the best available information, and a virtual site visit conducted on April 8, 2021, the Corps has determined that a development footprint for a single family residence (SFR) has already been established by the previous property owners of 3858 Crowley Lake Drive. It is the Corps, understanding, that the SFR you intend to build will remain within the existing development footprint and no additional impacts to waters of the U.S. are proposed. Subsequently, the Corps has determined no new permit is required for the development of a SFR on 3858 Crowley Lake Road. All work done on property was authorized under NWP SPL-2012-00564.

Thank you for participating and coordinating with the U.S. Army Corps of Engineers Regulatory Program. If you have any questions, please contact me at (805) 585-2145 or via e-mail at Gerardo.L.Hidalgo@usace.army.mil. Please help me to evaluate and improve the regulatory experience for others by completing the customer survey form at <https://regulatory.ops.usace.army.mil/customer-service-survey/>.

Sincerely,
 Jerry Hidalgo

Gerardo L. Hidalgo Project Manager
 Regulatory Division, North Coast Branch
 Ventura, CA Field Office
 Los Angeles District, U.S. Army Corps of Engineers
Gerardo.L.Hidalgo@usace.army.mil

Office: 805-585-2145
 Government Mobile: 213-320-8992

* During the Coronavirus Health Emergency, Regulatory Program staff are teleworking. Please do not mail hard copy documents to any Regulatory staff or office. For further details on corresponding with us, please view our COVID-19 special public notice at:
https://www.spl.usace.army.mil/Portals/17/docs/publicnotices/COVID19%20Regulatory_SPN.pdf?ver=2020-03-19-134532-833

Building Strong
<http://www.spl.usace.army.mil/Missions/Regulatory.aspx>

Assist us in better serving you! You are invited to complete our customer survey, located at the following link: <https://regulatory.ops.usace.army.mil/customer-service-survey/>

ATTACHMENT 5 – CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE LETTER

From: [Melanie Reedy](#)
 To: [Kelly Karl](#)
 Subject: Fw: SPL-2021-00225 (3858 Crowley Lake Drive SFR)
 Date: Friday, April 9, 2021 5:09:06 PM

[EXTERNAL EMAIL]

----- Forwarded Message -----

From: "Marquez, Alyssa@Wildlife" <Alyssa.Marquez@Wildlife.ca.gov>
 To: "Steinert, Tiffany@Waterboards" <Tiffany.Steinert@Waterboards.ca.gov>, "melanietravels@yahoo.com" <melanietravels@yahoo.com>
 Cc: "Zimmerman, Jan@Waterboards" <jan.zimmerman@waterboards.ca.gov>, "Gerardo.L.Hidalgo@usace.army.mil" <Gerardo.L.Hidalgo@usace.army.mil>
 Sent: Fri, Apr 9, 2021 at 5:06 PM
 Subject: RE: SPL-2021-00225 (3858 Crowley Lake Drive SFR)

Hello Melanie,

After consultation with the Regional Water Quality Control Board regarding the April 8 virtual site visit, the California Department of Fish and Wildlife (CDFW) has determined that if the construction and all associated ground disturbing activities (e.g. staging of equipment, stockpiles, etc.) remain in the existing development footprint at 3858 Crowley Lane Drive, then a Notification to CDFW for a Lake and Streambed Alteration Agreement is not required.

Please note that if your Project changes in any way that could result in any of the following impacts, you will need to notify CDFW for a Lake or Streambed Alteration Agreement through our online permitting portal ([EPIMS](#)). Please note that "any river, stream or lake" includes those that are dry for periods of time as well as those that flow year round and the "bank of any river, stream or lake" includes the associated riparian area and floodplain, not just the low flow channel.

- diverting or obstructing the natural flow of any river, stream, or lake,
- change the bed, channel, or bank of any river, stream or lake
- use material from any river, stream or lake; or
- deposit or dispose of material into any river, stream, or lake

Thank you,

Alyssa Marquez

Environmental Scientist

California Department of Fish and Wildlife – Inland Deserts Region 6

787 North Main Street Suite 220

Bishop, CA 93514

Cell: (760) 567-0332

Mono County Community Development Department

P.O. Box 347
Mammoth Lakes, CA 93546
(760) 924-1800, fax 924-1801
commdev@mono.ca.gov

Planning Division

P.O. Box 8
Bridgeport, CA 93517
(760) 932-5420, fax 932-5431
www.monocounty.ca.gov

February 18, 2021

To: Mono County Planning Commission

From: Kelly Karl, Associate Planner

Re: Use Permit 20-006/Schott & Reedy

RECOMMENDATION

It is recommended the Planning Commission take the following actions:

1. Find that the project qualifies as a Categorical Exemption under CEQA guideline 15303 and instruct staff to file a Notice of Exemption;
2. Make the required findings as contained in the project staff report; and
3. Approve Use Permit 20-006 subject to Conditions of Approval.

BACKGROUND

Approval of an accessory use prior to a main use requires a Director Review permit. The existing 116-square foot (sf) shed is exempt from a building permit and the subject of a formal complaint filed with Mono County Code Compliance for an accessory use prior to the main. A Notice of Violation was issued in 2020 (Attachment 1). To abate the violation, the property owners were advised to submit a Use Permit application for the non-compliant accessory use. A Use Permit application was submitted on August 3 and after which the project was downgraded to a Director Review due the minor nature of the project and a subsequent Director Review application was submitted on August 26. The Director Review application was accepted by the Land Development Technical Advisory Committee (LDTAC) on September 9. Shortly after the LDTAC meeting, staff received public comments from neighboring property owners expressing concern about the project. The project was then upgraded to a Use Permit due to the significant number of comments received that indicated that this project was controversial to the neighborhood (Attachment 2).

PROJECT DESCRIPTION

UP 20-006/Schott & Reedy would permit a 116-sf existing non-permitted shed to remain at 3858 Crowley Lake Drive (APN 060-150-004) as an accessory use prior to the construction of the main residential use (see Figure 3, Site Plan). The parcel is over an acre (~1.04-acre) in size and is designated Single-Family Residential (SFR). The shed was constructed in 2020 by the property owners and came to the attention of Code Enforcement when a formal complaint was submitted. The shed is exempt from a building permit under the California Building Code because it is less than 120-sf and has no utility connections (e.g., water and power) and would have been permitted outright if a main use had existed on the property. The property owners are seeking a Use Permit to allow the shed to remain on the property while they move forward

with the design process for the main residence. The parcel is surrounded by SFR-designated parcels to the south and west and Mixed Use (MU) parcels to the north and east (see Figure 2).

A site visit was conducted by Planning and Code Compliance staff on September 30, 2020, to verify site conditions (see Site Photo 1). Staff verified that there are no utility connections to the existing structure and that the structure is mostly complete except for exterior siding. Code Compliance verified that the existing shed is 30' from the Hilton Creek tributary stream that passes through the parcel. The applicants' intended use of the shed, per their Use Permit application, is "storage for tools and personal items, building materials in preparation for main house build."

The order of development occurring on this parcel is resulting in the shed triggering standards that are typically associated with a main use. In a more traditional development scenario, the main use would have been constructed first which would have been subject to General Plan development standards and a building permit which includes a Long Valley Fire Protection District will serve letter. The shed in this scenario would not have required a building permit and no part of this project would have been subject to County approval.

FIGURE 1: PROJECT LOCATION



FIGURE 2: PROJECT LAND USE DESIGNATION



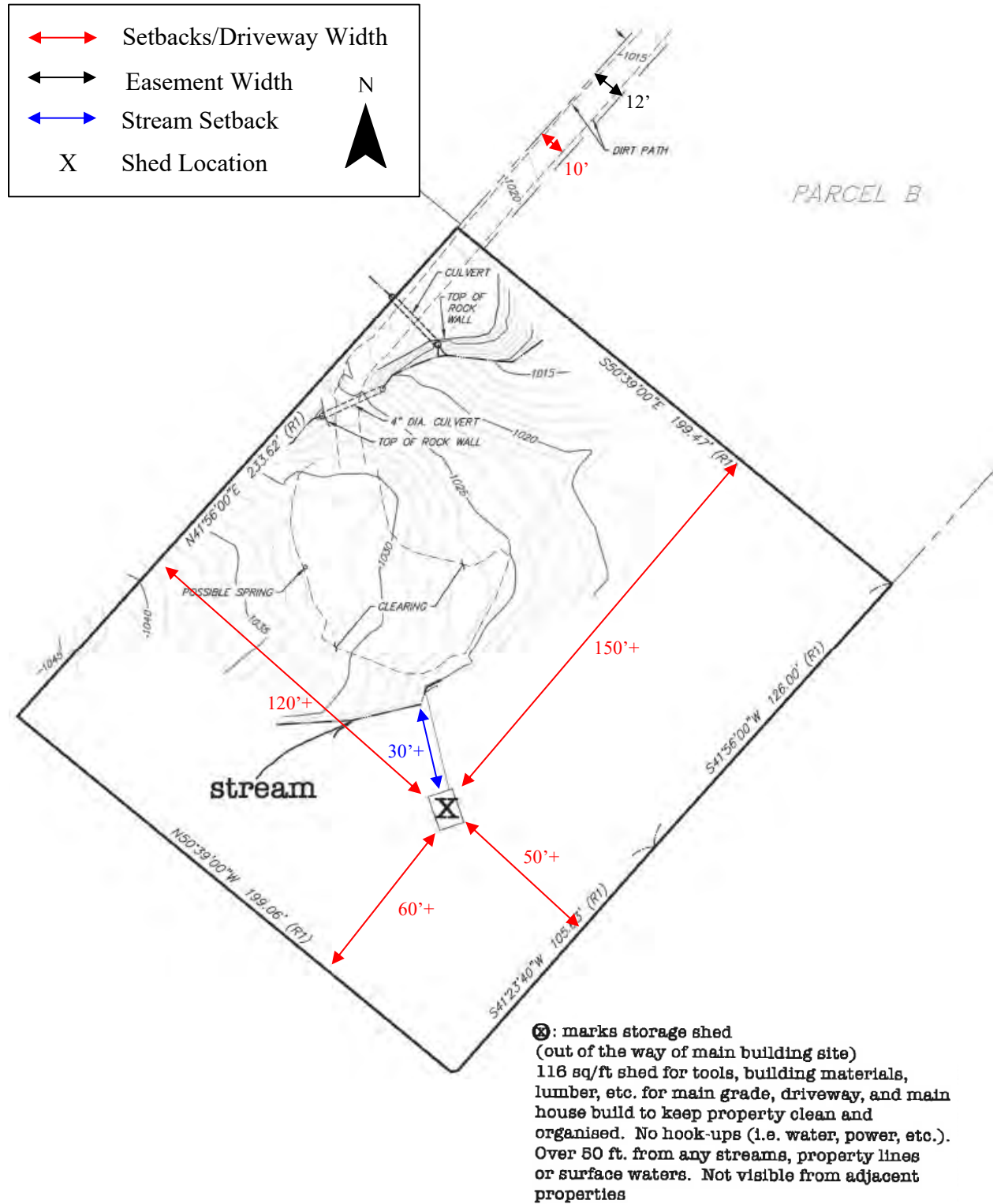
SITE PHOTO 1 – 09/30/2020



Existing 116-square foot shed, looking west.

UP 20-006/Schott & Reedy

FIGURE 3: SITE PLAN



LAND DEVELOPMENT TECHNICAL ADVISORY COMMITTEE (LDTAC)

The LDTAC reviewed and approved a Director Review application for processing on September 9, 2020. The draft conditions of approval for this project were reviewed and approved with edits by LDTAC on February 1, 2021. LDTAC members did not have edits to the final conditions of approval, however, the Long Valley Fire Protection District and a member of the public submitted verbal comments and requested additions to the conditions of approval.

Below is a summary of comments received during LDTAC:

- Long Valley Fire Protection District:
 1. Locked Gate Access: The District requested that a copy of the key to the lock that holds the chain across the driveway be provided to allow emergency access to the parcel should they be required to respond to an incident on the parcel.
 2. Driveway Access: The District cited concerns that the driveway does not meet driveway width and surface material load capacity requirements for safe and effective emergency access to the parcel.
 3. Hazardous Fuels: The District cited concerns about hazardous vegetation on the property. In particular, the encroaching vegetation along the driveway might prevent proper emergency access and the heavy fuel loading immediately adjacent to the existing shed could increase fire hazard risk.
 4. Storage of Hazardous Materials: The District is concerned about the potential storage of hazardous materials in the shed (such as: gasoline, paint thinner, etc.) as storage of these materials will increase the fire risk to the project parcel as well as neighboring parcels.
 5. Emergency Water: The District noted that an emergency water source will be needed as the property owners proceed to the Building Permit process for the main residence.
- Public Members:
 6. Storage of Hazardous/Flammable Materials: A member of the public cited concerns that the potential storage of hazardous and flammable materials in the shed could increase the fire hazard of the parcel and the surrounding properties.
 7. Hazardous Fuels: A member of the public cited a concern for the fuel loading on the property.
 8. Illegal Construction: A member of the public cited concerns about approving an illegally constructed shed through the Use Permit process.

The concerns above are addressed as follows:

1. Locked Gate Access: The property owners confirmed that the chain across the driveway located at the driveway entrance does not have a lock. The chain across the driveway is simply wrapped around the tree to indicate private property and deter potential trespassers (see Owner Site Photos #1 and #2 below). Access to the parcel by the Fire Protection District is not impeded by a lock.

In addition, the easement that allows access to the project parcel does not allow the property owners of 3858 Crowley Lake Drive to place a chain across the section of driveway that is on their neighbor's property. A condition of approval for this project will require the property owners of 3858 Crowley Lake Drive to either obtain

- permission for the chain to remain from the property owners at 3860 Crowley Lake Drive or move it to the section of driveway that is on their property.
2. Driveway Access: The driveway will be required to meet current standards in land Use Element Chapter 22, Fire Safe Regulations, including but not limited to, surface material load capacity, driveway width, and turnout requirements as part of the Building Permit for the future residence.
 3. Hazardous Fuels: Maintaining proper horizontal and vertical clearance along the driveway is required for this project and minor vegetation clearance pertinent to an unoccupied storage structure is also required. However, the defensible space requirement is not required for an unoccupied shed and will only be required as part of the building permit for the residence. Please see the sections below on driveway vegetation clearance and hazardous fuels reduction requirements near the shed for a more detailed analysis.
 4. Storage of Hazardous Materials: The utility occupancy in the Building Code includes one-story detached accessory structures and is the same occupancy classification that is applied to residential garages. As long as typical household substances associated with residential uses such as gasoline, thinners, etc. are stored in approved containers in an approved environment and in reasonable quantities, they are permitted to be stored in the shed just as they would be permitted to be stored in a residential garage. The storage shed does not have an electrical hook-up which should further reduce the likelihood of ignition of any flammable substances from an electrical source. In addition, this project will be required to adhere to hazardous fuels reduction conditions immediately around the shed to further reduce the fire hazard (see analysis in the Fire Safe Regulations section below).
 5. Emergency Water: This standard will be required as part of the building permit for the main use. Please see Emergency Water section below for a detailed analysis.
 6. Storage of Hazardous/Flammable Materials: Please see Item 4 above.
 7. Hazardous Fuels: Please see Item 3 above.
 8. Illegal Construction: The subject of this use permit is related to a Notice of Violation for construction of an accessory use prior to a main use; however, it should be noted that the property owners contacted the Community Development Department prior to constructing the shed to ask whether a building permit was required for a shed under 120-square feet without utilities. Staff indicated that a building permit is not required in this case but were unaware no primary use existed on the parcel. Regardless, the SFR designation allows for the construction of an accessory use prior to a main use subject to approval of a use permit by the Planning Commission.

PROPERTY OWNER SITE PHOTO #1 – 02/10/2021

Existing chain across the driveway entrance at the junction with Crowley Lake Drive looking towards the property.

PROPERTY OWNER SITE PHOTO 2 – 02/10/2021

Existing chain across the driveway is wrapped around a nearby aspen without a lock.

PUBLIC HEARING NOTICE

A hearing notice was published in the January 30, 2021, edition of The Sheet. Notices were also mailed January 25, 2021, to property owners within a 300' radius of the site (Attachments 3 & 4). Initial comments were received shortly after application acceptance, however, as of the drafting of this staff report one comment has been received (Attachment 6).

INITIAL COMMENTS RECEIVED (SEPTEMBER)

As noted above, a number of comments from neighboring property owners were received shortly after the LDTAC application acceptance (Attachment 2). Comments from two neighboring property owners and the Long Valley Fire Protection District are included in the packet. However, it should be noted that a third neighboring property owner commented initially and requested to remove their comments from any future formal comment packet provided to the Planning Commission.

Comment 1 – Opposed based on the following:

1. Tiny Home: One commenter cited concerns that the existing structure on the parcel was being used as a tiny home by the property owners.

Comment 2 – Opposed based on the following:

2. Fire Hazards: One commenter cited concerns regarding existing fire hazards on the property and the use of chainsaws and generators (which require gasoline – a flammable substance) and no infrastructure exists to suppress any potential fire. The same commenter noted concerns about the existing driveway not meeting emergency access/egress requirements for the Fire Protection District.
3. Camping & Improper Use of Stream: Concerns were also expressed regarding the property being camped on illegally without proper sanitation facilities and the potential impacts to and improper use of the creek that runs through the property.

Comment 3 – Long Valley Fire Protection District:

4. Relevant Fire Codes: The LVFPD submitted a letter with no stated opinion (in support or opposition) about the project that provided a list of fire codes the parcel and specifically the U/Group R-3 occupancy must abide by.

These concerns are addressed as follows:

1. Tiny Home: The existing structure lacks utilities and is intended to be used by the property owners as a storage shed for personal property as well as building materials and supplies for construction of a main residence. Storage sheds are classified as a utility occupancy and this type of occupancy is prohibited from being used as a habitable structure. A condition of approval for this project prohibits living on the property prior to receiving a certificate of occupancy for the main residence.
2. Fire Hazards: Please see analysis in Fire Safe Regulations section.
3. Camping & Improper Use of Stream: A condition of approval for this project prohibits living on the property prior to receiving a certificate of occupancy for the main residence. A condition of approval for this project requires compliance with Lahontan Regional Water Quality Control Board water quality regulations.

4. Relevant Fire Codes: LVFPD provided relevant fire codes as a reference for this project which will be required through the building permit, which will also require a will-serve letter from the fire district.

COMMENTS RECEIVED (RECEIVED BY FEBRUARY 10)

One additional comment opposed to the project was received by staff by the February 10 publishing deadline (Attachment 6).

Comment 1 – Opposed based on the following:

1. Violation Precedent: Concerns over issuing the permit and forgiving the existing violation as potentially setting a precedent for future violations and continued noncompliance with codes and laws. Based on the above the commenter asserts that removing the shed from the property is the correct solution.

These concerns are addressed as follows:

1. Violation Precedent: The General Plan, specifically the SFR designation, allows for approval of an accessory use prior to a main use through the Planning Commission's approval of a use permit. A common means for remedying a Code Violation is to apply for a use permit to approve the noncompliant accessory use prior to a main use. There is a well-established history of other storage structures throughout the County that have applied for a use permit approval to abate this type of violation.

WETLANDS

The project parcel is in a potential wetland area (see Figure 4) and construction activities in wetlands are regulated by the U.S. Army Corps of Engineers (USACE) and Lahontan Regional Water Quality Control Board (LRWQCB). Construction projects in wetland areas are typically required to obtain a Nationwide Permit 29 from the USACE and a Clean Water Act Section 401 Water Quality Certification from LRWQCB. Both agencies were formally notified about this project and the comment received from USACE is included in Attachment 5.

USACE determined that the shed does not require authorization from the USACE; “based on the pictures and plans I’ve determined the shed is not a discharge of dredged or fill material nor does it have the effect of fill. Consequently, the shed does not require authorization for the Corps.” In addition, the USACE noted that the property owners have already reached out about permitting the single-family residence.

LRWQCB was notified but did not submit a formal determination on whether a Clean Water Act Section 401 Water Quality Certification is required for the existing shed. A condition of approval for this project requires the property owners to obtain proper approval from LRWQCB for the existing shed.

Mono County has policies in both the Land Use Element and the Conservation/Open Space Element that encourages protection of wetlands and coordination with LRWQCB & USACE as the agencies with jurisdiction over construction in wetland areas. Therefore, while the County typically adds a condition for compliance with these agencies, the Mono County approval is not withheld for a determination. The project applicant/owner is responsible for obtaining required approvals, and the agency is responsible for enforcing its own regulations.

MONO COUNTY LAND USE ELEMENT, LONG VALLEY AREA PLAN WETLANDS POLICIES

Policy 21.C.3. *Preserve, maintain and enhance surface and groundwater resources in the planning area.*

Action 21.C.3.c. *Develop a Special Area Management Plan⁹ in cooperation with the US Army Corps of Engineers for wetlands in Long Valley.*

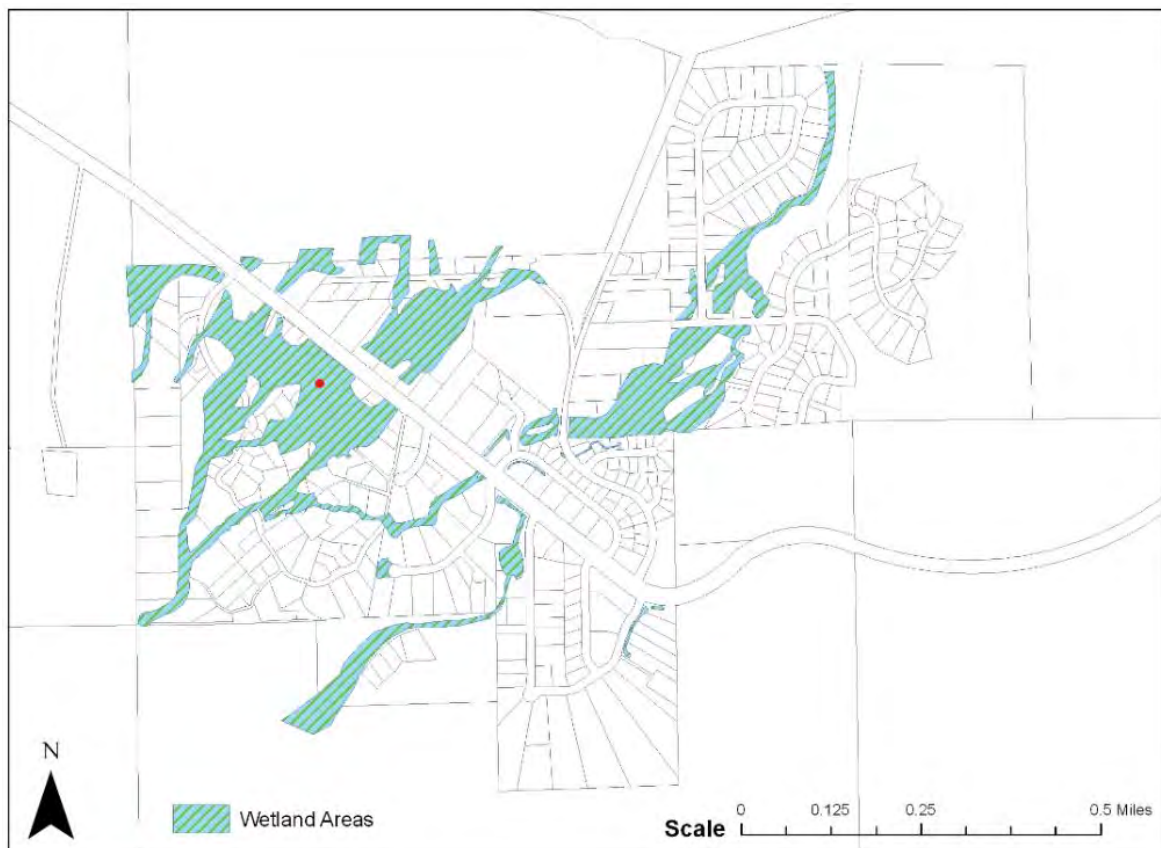
MONO COUNTY CONSERVATION/OPEN SPACE, WETLANDS POLICIES

Policy 4.A.7. *Continue to support “no net loss” of wetlands at a regional scale.*

Action 4.A.7.a. *Establish policies for the management of wetlands in Mono County, including cooperation and compliance with state and federal agencies that manage wetlands.*

Action 4.A.7.b. *Continue collaborating with applicable agencies to monitor the status of wetlands, such as annual reporting to the Lahontan Regional Water Quality Control Board.*

FIGURE 4: CROWLEY LAKE WETLAND AREAS



Project parcel location indicated with red dot.

STREAMS, CREEKS, & WATERWAYS

In addition to the wetlands discussed above, the project parcel also has a tributary stream that passes through the parcel. The California Department of Fish and Wildlife (CDFW) requires any

person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources. CDFW was formally notified about this project and CDFW's comment is included in Attachment 5. CDFW was unable to determine based on information included in the formal notification sent by County staff whether an LSA would be required for this project and requested that the property owners submit an LSA notification via CDFW's Environmental Permit Information Management System (EPIMS) portal.

FIRE SAFE REGULATIONS

Mono County's fire safe standards are set forth in the Mono County General Plan, Land Use Element, Chapter 22, Fire Safe Regulations. However, the State Board of Forestry and Fire Protection is in the process of completing a legislatively mandated comprehensive update to Title 14 of the California Code of Regulations, Division 1.5, Chapter 7, Subchapter 2, Articles 1-5 "State Minimum Fire Safe Regulations." The 2021 update to Title 14 is anticipated to be completed in June or July of this year which will supersede all regulations in Mono County's existing Chapter 22. The fire safe regulations analyzed in this section reference the current Chapter 22 standards and the conditions of approval related to fire safe standards use the phrase "most recently adopted standard" to mean the standards in effect when a building permit is submitted for the main residence (i.e., Chapter 22 or the 2021 version of Title 14).

Existing Driveway & Vegetation Clearance

The existing access to the project parcel is provided via an approximately 350' long dirt driveway that is 10' wide and well below the maximum grade of 16%. To access the project parcel, the existing driveway crosses through a neighboring parcel (3860 Crowley Lake Drive) via a 12' wide easement for "ingress, egress and road purposes over the northerly 12 feet" of the parcel. There is a chain in place across the entrance to the driveway that is wrapped around a nearby aspen as a deterrent to trespassing. There is no lock holding the chain in place, so it does not prevent emergency access by the LVFPD. However, the existing access easement does not allow placement of a chain so the property owners of 3858 Crowley Lake Drive will need to either obtain permission from their neighbors for the chain to remain in its current location or move the chain to the section of driveway at the entrance to their property.

General Plan Land Use Element Section 22.110.J. of Chapter 22, Fire Safe Regulation, requires that all driveways be constructed to provide a minimum of one 10-foot traffic lane. The existing access is compliant with this standard per the site plan (Figure 3). Per section 22.150.B. of Chapter 22, Fire Safe Regulations the minimum clearance requirements for driveway access is a minimum of 7' of unobstructed horizontal clearance from the centerline (for a total of 14' of horizontal clearance) and unobstructed vertical clearance of 15'. However, since the project parcel is accessed through a neighboring parcel (3860 Crowley Lake Drive) via a 12' wide easement the property owners cannot meet the full horizontal clearance standard as it extends past the boundary of their easement on a neighbor's property. Per section 22.150.B3., "no person shall be required to

maintain any clearing on any land if that person does not have the legal right to maintain that clearing.” Therefore, the project is required to meet a 12’ wide vegetation clearance on the section of driveway provided by the easement and shall be required to provide the full 14’ width on the section of driveway that occurs on their property. The 15’ vertical clearance will be required on the entire length of the driveway.

Defensible Space Standards

In addition to the vegetation clearance required for proper emergency access/egress on the existing driveway, defensible space clearance will also be required near the existing shed. Per section 22.150.A.2.(b)-(c), dead or dying tree branches adjacent to or overhanging a building as well as any leaves, needles, or other vegetative growth on the roof of any structure need to be removed (full text below). Section 22.150.A.2.a. and d-f are not triggered for this project as it is not an occupied structure and a propane tank is not currently installed on the parcel. An optional condition of approval has been provided for consideration by the Planning Commission that would require flammable vegetation clearance within 30 feet of the shed (section 22.150.d.). However, implementing this requirement may be problematic since the 30’ clearance requirement abuts the existing creek and could impact wetlands and the existing streambed which are under the authority of the USACE, LRWQCB, and CDFW.

- “2. The existence or maintenance of any of the following conditions is prohibited:*
- a. Tree branches within 10 feet of a chimney outlet or stovepipe outlet;*
 - b. Dead or dying tree branches adjacent to or overhanging a building;*
 - c. Leaves, needles, or other dead vegetative growth on the roof of any structure;*
 - d. Flammable vegetation or other combustible growth within 30 feet of an occupied dwelling or structure that prevents the creation of a firebreak;*
 - e. Brush, flammable vegetation, or combustible vegetation located between 30 and 100 feet of an occupied dwelling or structure that prevents the creation of a Reduced Fuel Zone; or*
 - f. Brush or other flammable material within 10 feet of a propane tank.”*

Driveway Turnout Standard

The driveway is approximately 350’ in length and is existing nonconforming with the requirement for turnouts on driveways exceeding 150’ in length. General Plan Land Use Element Section 22.110.J. of Chapter 22, Fire Safe Regulation, requires driveways exceeding 150’ in length to provide a turnout near the midpoint of the driveway. Turnouts are required to be a minimum of 12’ wide and 30’ long with a minimum 25’ taper on each end. A turnout near the midway point of the driveway will not be possible for this project due to the halfway point occurring on the neighboring property and the width of the access easement on that property does not allow for a turnout to be legally constructed in that area. The property line occurs at approximately 246’ from the junction with Crowley Lake Drive (Figure 5, below), the precise halfway point for the approximately 350’ driveway would be at 175’ from the junction with Crowley Lake Drive. This requirement will be triggered as part of the Building Permit for the future main residence as the existing shed is a utility occupancy that does not allow for habitation and thus, will not create a need for occupants to evacuate in the case of an emergency. Additionally, the vegetation clearance requirements discussed above should allow for proper emergency access/egress by the Long Valley Fire Protection District should they need to respond to an incident on the parcel.

FIGURE 5: DRIVEWAY TURNOUT MEASUREMENTS

The most recently adopted standard for driveway access and turnouts will be applied to this project when the building permit application for the main residence is submitted. Four options for future compliance with the turnout requirement are provided below, however selecting an option is outside the purview of this use permit and will be completed at the building permit stage:

1. Option 1: The property owners can work with the owners of 3860 Crowley Lake Drive to adjust the existing easement to allow for the additional dimensions necessary to implement a turnout near the midway point of the driveway.
2. Option 2: A turnout could be provided close to the property line at 246' (a 71' difference from the true midpoint of the driveway). Given the constraints of the easement, such a turnout could be deemed to meet the intent of the Chapter 22 regulations and must be approved by the LVFPD through a will-serve letter for the building permit.
3. Option 3: The property owners could apply to CALFIRE for an exception to the turnout standard. An exception is defined in section 22.091 as “an alternative to the specified standard requested by the applicant that may be necessary due to health, safety, environmental conditions, physical site limitations or other limiting conditions, such as recorded historical sites, that provides mitigation of the problem.”
4. Option 4: The property owners could apply for an exemption to the turnout standard. One possible exemption is for the property owners to present documentation that the parcel was created before January 1, 1991 by a parcel map or tract map and that conditions relating to the perimeters and access to the buildings were imposed by the parcel map or final tentative map.

Driveway Surface

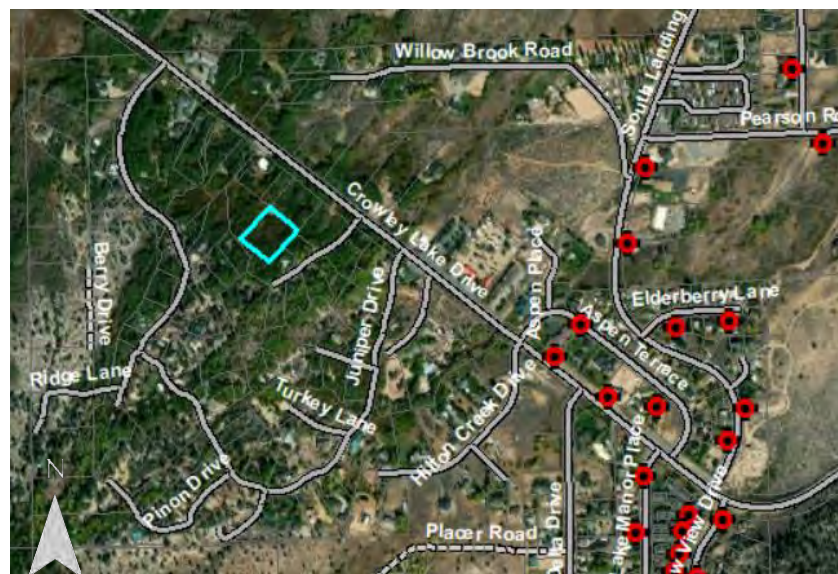
The existing access to the parcel is currently nonconforming with driveway surface standards. Section 22.110.B. specifies that driveways be designed and maintained to support at least 75,000 pounds and provide an aggregate base. To meet this standard, the road surface of the existing access will need to be upgraded. A variety of driveway surface materials could be used to meet

this standard, provided that the engineering specifications that indicate this surface material can support the required load is submitted to the Community Development Department. This requirement will be triggered as part of the Building Permit for the future residence and will be subject to the load requirement specified in the most recently adopted regulations.

Emergency Water Standards

Per section 22.130.A. of Chapter 22, Fire Safe Regulations (full text below) emergency water standards apply to all parcels being developed in Long Valley. The project parcel is located in an area without access to fire hydrants (see Figure 6) and installation of a water tank is the most common way to meet emergency water standards. However, there are a variety of ways to meet this standard. Per section 22.130.B., “such emergency water may be provided in a fire agency mobile water tender, or naturally occurring or man-made containment structure, as long as the specified requirement is immediately available.” Due to the existence of wetlands and a creek on the property, proper placement of any emergency water source will require consultation and approval from the USACE, LRWQCB, & CDFW. In addition, proper placement of an emergency water source will also need to take into account the buildable area of the future main residence, the driveway requirements discussed above (turnout, width, and an upgraded driveway surface), as well as coordinating with LVFPD for proper placement for the best access for emergency use. Thus, including the emergency water source as part of the Building Permit process for the main residence allows for proper site planning. The water source will be required to meet the National Fire Protection Associate (NFPA) 1142, “Standard on Water Supplies for Suburban and Rural Fire Fighting” 2012 Edition.

FIGURE 6: CROWLEY LAKE HYDRANT LOCATIONS



CEQA COMPLIANCE

This Use Permit qualifies for a Class 3 Categorical Exemption under CEQA Guideline 15303(e): *CEQA Guidelines 15303 construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are*

the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:

(a) One single-family residence, or a second dwelling unit in a residential zone may be constructed or converted under this exemption.

(e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

This project qualified as a Class 3 exemption because it consists of the installation of a small accessory structure and the use of a storage shed is not substantially different from the use of other non-occupied structures such as a garage, which is specifically listed as exempt. The property owner will also be required to obtain proper approval for construction in wetlands and near streams/waterways from the USACE, LRWQCB, & CDFW and comply with any mitigation or remediation requirements from these agencies. The project is not expected to cause any significant environmental impacts.

GENERAL PLAN CONSISTENCY

The project is consistent with the intent and permitted uses of Single-Family Residential (SFR) land use designation, which permits construction of a secondary use (e.g., a storage shed) prior to the main use with approval of a Use Permit.

The project is consistent with Countywide Land Use Policies that seek to accommodate future growth in a manner that preserves and protects the area's scenic resources by regulating future development in a manner that minimizes visual impacts. The project is consistent with Long Valley Area Plan Policies which seek to maintain, protect, and enhance the livability of community areas.

MONO COUNTY LAND USE ELEMENT, COUNTYWIDE LAND USE POLICIES

Objective 1.A.

Accommodate future growth in a manner that preserves and protects the area's scenic, agricultural, natural, cultural and recreational resources and that is consistent with the capacities of public facilities and services.

Policy 1.A.6. *Regulate future development in a manner that minimizes visual impacts to the natural environment, to community areas, and to cultural resources and recreational areas.*

Action 1.A.6.a. *Implement the Visual Resource policies in the Conservation/Open Space Element.*

MONO COUNTY LAND USE ELEMENT, LONG VALLEY AREA PLAN POLICIES

The project is consistent with the following Long Valley Area Plan Policies:

Objective 23.B.

Maintain, protect and enhance the quality and livability of community areas.

Policy 23.B.1. *Preserve and enhance existing single-family residential uses.*

***Action 23.B.1.a.** Future residential development in community areas shall have a minimum lot size of 15,000 sq. ft. except for areas adjacent to existing development with lot sizes of 7,500-10,000 square feet, where the minimum lot size may be 10,000 square feet if individual septic disposal systems are not required.*

SETBACKS

The existing shed meets the setback requirements for SFR parcels greater than one-acre in size which are 30' front, 30' side, and 30' rear setbacks. The waterway running through the property is a tributary of Hilton Creek and is USGS blue-line stream. Mono County's 30' stream setback requirement is triggered, and Community Development Department staff confirmed during a September 2020 site visit that the shed is more than 30' from the stream.

USE PERMIT FINDINGS

In accordance with Mono County General Plan, Chapter 32, Processing-Use Permits, the Planning Commission may issue a Use Permit after making certain findings.

Section 32.010, Required Findings:

1. *All applicable provisions of the Mono County General Plan 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 because:*
 - a. The parcel is adequate in size and shape to accommodate the existing 116-square foot storage shed as well as the future main use.
 - b. Lot coverage is well below the 40% maximum for the SFR designation.
 - c. The SFR designation allows for the construction of an accessory building prior to a main use with approval of a Use Permit.
 - d. The shed meets setbacks for the 30' front, side, and rear yard setbacks for the SFR designation.
 - e. The shed is setback more than 30' from the existing Hilton Creek tributary stream and meets County stream setback requirements.
2. *The site for the proposed use related to streets and highways is adequate in width and type to carry the quantity and kind of traffic generated by the proposed use because:*
 - a. No new impacts to streets and highways are expected from the construction of a 116-square foot storage shed. The existing dirt driveway will be required to meet current fire safe standards under a future building permit for the main residence. There are four options for this parcel to potentially comply with this requirement at the building permit stage.
3. *The proposed use will not be detrimental to the public welfare or injurious to property or improvements in the area on which the property is located because:*
 - a. The shed is a minor property improvement that is typically exempt from planning and building permits because of the low likelihood that it would impact adjacent properties.

- b. Although already required by the General Plan, a condition of approval for this project prohibits camping or otherwise living on the property prior to construction of the main residence.
 - c. The construction of a main residence will require a building permit from Mono County as well as appropriate permits and approvals from LRWQCB, CDFW, and USACE.
 - d. The shed will be required to follow Mono County Design Guidelines, including the use of non-reflective materials and painting the shed a solid color that blends into the surrounding landscape (see Condition of Approval #5) which will mitigate potential visual impacts to surrounding property owners.
 - e. Proper storage of tools and supplies necessary for the construction of the primary residence will also be required as a condition of approval further minimizing any detrimental impacts to neighboring properties.
4. *The proposed use is consistent with the map and text of the Mono County General Plan because:*
- a. The SFR designation is intended to provide for the development of single-family dwelling units and permits the construction of accessory buildings prior to the main use with approval of a Use Permit. The shed will provide storage for personal items as well as tools and supplies for future home construction on the parcel consistent with the SFR designation.
 - b. The proposed use is not expected to cause significant environmental impacts or be detrimental to surrounding property.
 - c. The proposed use is consistent with the General Plan, the Long Valley Area policies, and Countywide land use policies.

This staff report has been reviewed by the Community Development Director.

ATTACHMENTS

- Attachment 1: Notice of Violation
- Attachment 2: Initial Public Comments (September)
- Attachment 3: Public Hearing Notice Mailer
- Attachment 4: Published Public Hearing Notice
- Attachment 5: USACE & CDFW Comments
- Attachment 6: Public Comment (Received by February 10)

MONO COUNTY

Planning Division

NOTICE OF DECISION & USE PERMIT

USE PERMIT: UP 20-006

APPLICANT: Matthew Schott & Melanie Reedy

ASSESSOR PARCEL NUMBER: 060-150-004

PROJECT TITLE: Accessory use (116-squaure foot storage shed) prior to construction of main use.

PROJECT LOCATION: 3858 Crowley Lake Drive, Crowley Lake

CONDITIONS OF APPROVAL

See attached Conditions of Approval

ANY AFFECTED PERSON, INCLUDING THE APPLICANT, NOT SATISFIED WITH THE DECISION OF THE COMMISSION, MAY WITHIN TEN (10) DAYS OF THE EFFECTIVE DATE OF THE DECISION, SUBMIT AN APPEAL IN WRITING TO THE MONO COUNTY BOARD OF SUPERVISORS.

THE APPEAL SHALL INCLUDE THE APPELLANT'S INTEREST IN THE SUBJECT PROPERTY, THE DECISION OR ACTION APPEALED, SPECIFIC REASONS WHY THE APPELLANT BELIEVES THE DECISION APPEALED SHOULD NOT BE UPHeld AND SHALL BE ACCOMPANIED BY THE APPROPRIATE FILING FEE.

DATE OF DECISION/USE PERMIT APPROVAL: February 18, 2021

EFFECTIVE DATE USE PERMIT: February 29, 2021

This Use Permit shall become null and void in the event of failure to exercise the rights of the permit within one (1) year from the date of approval unless an extension is applied for at least 60 days prior to the expiration date.

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.

MONO COUNTY PLANNING COMMISSION

DATED: February 18, 2021

cc: X Applicant
X Public Works
X Building
X Compliance

CONDITIONS OF APPROVAL
Use Permit 20-006/Schott & Reedy
***Planning Commission edits in red**

1. The project shall comply with provisions of the Mono County General Plan, Mono County Code, and project conditions.
2. The 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.
3. Camping or living on the property is prohibited until the main residence has been constructed and receives a Certificate of Occupancy from the Building Division.
4. The shed **shall be completed and secured against unauthorized entry. Flammable liquids/materials shall not be stored in the shed.**
5. The shed shall follow Mono County Design Guidelines, including the use of non-reflective materials. The shed shall be painted a dark solid color that blends into the surrounding landscape, vegetation, and/or structures.
6. A complete Building Permit application for the residence shall be submitted within (2) two-years of the decision date of this Use Permit. This submittal shall be compliant with the most recently adopted **fire safe standards, including but not limited to**, driveway standards (including but not limited to width, turnout, & surface load) as well as provide an emergency water source compliant with the most recently adopted standard.
7. The project shall remove dead or dying tree branches adjacent to or overhanging the storage shed as well as any leaves, needles, or other vegetative growth on the roof of the shed during non-snow months to reduce hazardous fuel loading immediately around the project site.
8. The property owners shall either obtain permission from the owners of 3860 Crowley Lake Drive for the chain across the driveway to remain in its current location or move it to the section of driveway on their property (3858 Crowley Lake Drive).
9. The property owners shall submit a Lake and Streambed Alteration (LSA) Agreement notification via California Department of Fish & Wildlife's Environmental Permit Information Management System (EPIMS) portal and receive any necessary approvals from this agency.
10. The property owners shall contact and receive Clean Water Act Section 401 Certification approval, if applicable, from the Lahontan Regional Water Quality Control Board for the existing shed.
11. Property shall be maintained in a neat and orderly manner. Storage of materials and equipment shall occur only within the storage shed.
12. Revocation: The Commission may revoke the rights granted by a use permit 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 use permit or the violation by the owner or tenant of any provision pertaining to the premises for which such use 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.

13. Termination: Per section 32.060 of the Land Use Element, a use permit 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.
14. Extension: If there is a failure to exercise the rights of the use 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 for the use permit 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.

ATTACHMENT 1: NOTICE OF VIOLATION

**Mono County
Community Development Department**

P.O. Box 347
Mammoth Lakes, CA 93546
(760) 924-1826, fax 924-1801
ncriss@mono.ca.gov

Compliance Division

P.O. Box 8
Bridgeport, CA 93517
(760) 932-5424, fax 932-5431
jsuppa@mono.ca.gov

July 9, 2020

Melanie Reedy & Mathew Schott
PO Box 9157
Mammoth Lakes, CA 93546

NOTICE OF VIOLATION

Complaint No. 2020/020 – Regarding violations of the Mono County General Plan and the Mono County Code, 3858 Crowley Lake Drive, Crowley Lake, CA, Assessor’s Parcel No. 060-150-004.

To: Melanie Reedy & Mathew Schott,

The Mono County Compliance Division has received complaints regarding the unpermitted construction accessory structures on the aforementioned property. In response, the Mono County Compliance Division performed a site inspection and it was observed that a small accessory structure was in fact being constructed on site. Based on the recent inspection, the following violations were observed to exist on your property – Assessor Parcel No. 060-150-004:

Violation No. 1 – Mono County General Plan Section 04.020 – Uses Permitted
B. Buildings, structures and land **shall be used**, designed, erected, structurally altered or enlarged only for the purposes listed as permitted in the land use designation in which such building, structure or land is located, and then only after applying for and securing all permits and licenses required by law.

*Your property is designated Single Family Residential (SFR) within the Mono County General Plan Land Use Element. While accessory buildings and uses are generally permitted in the SFR designation, 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** or through the Use Permit process. At this time Mono County records indicate this is a vacant unimproved parcel and no use permit has been issued to construct an accessory structure prior to the main use. Construction or placement of accessory structures on vacant parcels without obtaining the required permits is a violation of Mono County General Plan Section 04.020.*

Violation No. 2 – Mono County Code Section 7.20.020 Nuisance Prohibition.

No person shall commit, create or contribute to the creation of a public nuisance in the county, nor shall anyone allow a condition constituting a public nuisance to exist on property in the county that is within their ownership or control. Mono County Code Section 7.20.010 D.1 defines a “Public Nuisance” as any violation of any provision of the Mono County Code, the Mono County General Plan, any county area or specific plan, airport land use plan, any variation or subpart of the foregoing, or any other land-use planning document duly approved by the board of supervisors or the planning commission. Mono County Code Section 7.20.010 D.4 defines a “Public Nuisance” as any violation of state law, including but not limited to the State Housing Law (commencing with Section 17910 of the California Health & Safety Code).

Violation 1 is determined to be “Public Nuisance” and is a violation of the Mono County Code Section 7.20.020.

You are hereby ordered to abate the violations and comply with the following directives:

Directive No. 1

On or before **August 14, 2020**, demolish and remove the accessory structure along with all associated demolition/construction material and debris from the property.

As per Mono County Code Sections 1.12.010, 1.12.020 and 1.12.030, failure to comply with a County Regulation may result in the issuance of an Administrative Citation (fines & penalties).

An Administrative Fine amounts to **\$100.00** per day for each violation of a County Regulation, applicable for each of the first five days of noncompliance. After the initial five-day period, the fine will then be **\$500.00** per day for each violation for each day thereafter.

If you have any additional questions or would like to schedule a site field meeting, please do not hesitate to call me at (760) 924-1826 M-F.

Thank you for your attention to this matter, and I look forward to your voluntary compliance with the Mono County codes.

Sincerely,

Nick Criss, Code Compliance Officer
Mono County Compliance Division

CC: File 2020/020
Wendy Sugimura, Community Development Director
Fred Stump, District 2 Supervisor

Via: Certified Mail:
Melanie Reedy & Mathew Schott
PO Box 9157

Mammoth Lakes, CA 93546

ATTACHMENT 2: INITIAL PUBLIC COMMENTS (SEPTEMBER)

COMMENT #1

-----Original Message-----

From: Bill Mitchell <billmitchellconstruction@gmail.com>

Sent: Thursday, September 10, 2020 1:27 PM

To: Wendy Sugimura <wsugimura@mono.ca.gov>

Cc: Fred Stump <fstump@mono.ca.gov>

Subject: Reedy-Schott property illegal Structure

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Wendy, I am an adjacent property owner of the property under consideration for approval of what appears to be a Tiny Home disguised as a Shed. I would encourage you to definitely visit the structure so you can see for yourself the intended use. I recently sold a house which is also adjacent to 3858 Crowley Lake Drive, the address of the subject property. I would guess their property tax is north of \$600 per month. Their neighbors have attempted to build a tiny home illegally, pay no taxes for it, and use it for a getaway. You will have a very clear picture of the situation if you visit the site. Fred Stump will be happy to give you a tour. Also please touch base with Nick regarding my compliance requirements on my property.

Thank You for your attention to this issue. BILL AND MAGGIE MITCHELL

bmitchell iphone

COMMENT #2

From: Gordon Shaw <gshaw@qnet.com>
Sent: Monday, September 14, 2020 1:49 PM
To: Wendy Sugimura <wsugimura@mono.ca.gov>
Cc: Fred Stump <fstump@mono.ca.gov>; billmitchellconstruction@gmail.com; Kelly Karl <kkarl@mono.ca.gov>; Nick Criss <ncriss@mono.ca.gov>; 'Vince Maniaci' <longvalleyfd@gmail.com>
Subject: FW: Reedy-Schott property illegal Structure

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Wendy,

My name is Sharon Shaw and my property is located south of the Reedy-Schott property. We have a Juniper Dr. address. My husband Gordon and I would like to add our concerns with all the issues that Mr. and Mrs. Mitchell wrote you about as well as add a few of our own. I have served on the Long Valley Fire Protection Board of Commissioners for 26 years and was a firefighter prior to that for almost 4 years. Gordon served on the fire department for nineteen years. We have serious issues with the fire hazards that exist with no fire equipment access to the property. The use of chainsaws and generators (which require gasoline) on the property create a fire hazard and they have no way of putting out a fire should they create one. They have violated all the requirements to give the fire district proper access to their property. I believe that Chief Maniaci will be writing you regarding those violations. Additionally, I am the neighbor that witnessed the owner of the property bathing in the stream approximately 30 yards from the back of our deck. He was in his underwear and clearly saw me observe him. The following day a blue tarp had been placed over the stream where this occurred. The tarp has since been removed. This kind of behavior leads to many sanitation issues. There is no sewer connection from the property that I am aware of so where is sewage being disposed of? Thank you for your time regarding this matter.

Sharon and Gordon Shaw

COMMENT #3

From: Chief Vince Maniaci <longvalleyfd@gmail.com>
Sent: Wednesday, September 16, 2020 9:01 AM
To: Wendy Sugimura <wsugimura@mono.ca.gov>
Subject: Reedy-Schott

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Wendy,

Per my conversations with several Crowley Community folks; and reading the email chains, here are a few points of fire related issues they were referencing. Not sure to what extent the owners have submitted for their project but thought I could share what I could find. If you have any questions feel free to write or call. Thanks

Sincerely,

--

Chief Vince Maniaci
3605 Crowley Lake Drive
Crowley Lake, Ca. 93546

[]



Long Valley Fire Protection District

3605 Crowley Lake Drive •
Crowley Lake • California 93546-1145
Ph. 760.935.4545
longvalleyfd@gmail.com

September 14,2020

Reedy-Schott property

3858 Crowley Lake Dr.

Crowley Lake, CA 93546

All

I'm writing to follow up on the Reedy-Schott proposal. Several members of the community from Appleton-Juniper Loop have asked for clarification of Fire related codes this parcel must abide by. I offer the following brief description of just a few items which will need to be addressed prior to continuance of a Group U/ Group R-3 occupancy:

Mono County Chapter 22 -Fire Safe Regulations

Sections 22.010- 22.150

Mono county fire regulations on driveway and road design- standards and measurements.

California Fire Code.

Chapter 5

CFC 503.1-503.4 -fire apparatus access roads

CFC 505.1-premises identification street address numbers.

Chapter 3

CFC 313.1 -fueled equipment storage

CFC 315.1; 315.4 -general storage

Chapter 33

CFC 3310.1 access for firefighting.

CFC Appendix D

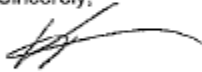
Chapter 57

CFC 5704.3.4.4-external storage of hazardous material

In addition to the above client should review requirements from California Code of Regulations Title 19 regarding extinguishers used in high hazard fuel loads during construction. WUI regulations of types of building materials.

If you have any further questions or would like me to elaborate on any of the above; please don't hesitate to contact me.

Sincerely,



Vince Maniaci

Fire Chief

Long Valley Fire Protection District

ATTACHMENT 3: PUBLIC HEARING NOTICE MAILER

Mono County Community Development Department Planning Division

P.O. Box 347
Mammoth Lakes, CA 93546
(760) 924-1800, Fax 924-1801
commdev@mono.ca.gov

P.O. Box 8
Bridgeport, CA 95517
(760) 932-5420, Fax 932-5431
www.mono-county.ca.gov

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that Mono County Planning Commission will conduct a public hearing **February 18, 2021**. As authorized by Gov. Newsom's Executive Orders, N-25-20 and N-29-20, the meeting will be accessible remotely by livecast at: <https://zoom.us/join> and by telephone at: 669-900-6833 (Meeting ID# is 991 4587 0745) where members of the public shall have the right to observe and offer public comment, to consider the following: **9:05 a.m. CONDITIONAL USE PERMIT 20-006/Schott & Reedy**. The proposal is for placement of a 116-square foot storage shed prior to construction of the primary residence at 3858 Crowley Lake Drive (APN 060-150-004) in Crowley Lake. The parcel is designated Single-Family Residential (SFR).

In accordance with the California Environmental Quality Act, a Notice of Exemption will be filed. Project materials are available for public review online at <https://monocounty.ca.gov/planning-commission> and hard copies are available for the cost of reproduction by calling (760) 924-1800.

INTERESTED PERSONS are strongly encouraged to attend the livecast meeting by phone or online, and to submit comments by **8 am on Wednesday, February 17** to the Secretary of the Planning Commission, PO Box 347, Mammoth Lakes, CA 93546 to ensure timely receipt, by email at cddcomments@mono.ca.gov, or via the livecast meeting (technology permitting). 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 to Secretary to the Planning Commission at, or prior to, the public hearing.

For additional questions, please contact the Mono County Planning Division:

Kelly Karl, Associate Planner
PO Box 347
Mammoth Lakes, CA 93546
(760) 924-1809, kkarl@mono.ca.gov



Planning | Soilings | Code Compliance | Environmental | Collaborative Planning Team (CPT)
Local Agency Formation Committee (LAFCO) | Local Transportation Commission (LTC) | Regional Planning Advisory Committee (RPAC)

ATTACHMENT 4: PUBLISHED PUBLIC HEARING NOTICE

**MONO COUNTY
PLANNING COMMISSION**

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

January 25, 2021

To: The Sheet
From: Becky Peratt
Re: Legal Notice for **January 30** edition
Invoice: Becky Peratt, PO Box 347, Mammoth Lakes, CA 93546

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Mono County Planning Commission will conduct a public hearing on **February 18, 2021**. As authorized by Gov. Newsom's Executive Orders, N-25-20 and N-29-20, the meeting will be accessible remotely by livecast at: <https://zoom.us/join> and by telephone at: 669-900-6833 (Meeting ID# is 991 4587 0745) where members of the public shall have the right to observe and offer public comment, to consider the following: **9:05 a.m. CONDITIONAL USE PERMIT 20-006/Schott & Reedy**. The proposal is for placement of a 116-square foot storage shed prior to construction of the primary residence at 3858 Crowley Lake Drive (APN 060-150-004) in Crowley Lake. The parcel is designated Single-Family Residential (SFR). In accordance with the California Environmental Quality Act, a Notice of Exemption will be filed. Project materials are available for public review online at <https://monocounty.ca.gov/planning-commission> and hard copies are available for the cost of reproduction by calling 760-924-1800. INTERESTED PERSONS are strongly encouraged to attend the livecast meeting by phone or online, and to submit comments to the Secretary of the Planning Commission, PO Box 347, Mammoth Lakes, CA, 93546, by **8 am on Wednesday, February 17**, to ensure timely receipt, by email at cddcomments@mono.ca.gov, or via the livecast meeting (technology permitting). 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 to Secretary to the Planning Commission at, or prior to, the public hearing.

###

ATTACHMENT 5: USACE & CDFW COMMENTS

USACE COMMENT

From: [Hidalgo_Gerardo.L.CIV.USARMY.CESPL \(USA\)](mailto:Hidalgo_Gerardo.L.CIV.USARMY.CESPL@USA)
To: [Kelly Karl](#)
Cc: [SPL Permit Inquiries](#)
Subject: RE: USACE Consultation for Mono County Use Permit Application
Date: Friday, January 8, 2021 3:17:29 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Kelly,

Based on the pictures and plans I've determined the shed is not a discharge of dredged or fill material nor does it have the effect of fill. Consequently, the shed does not require authorization for the Corps.

The property owners of 3858 Crowley Lake Drive (APN 060-150-004-000) have reached out about permitting the single-family residence. The property has received permits from the Corps in 2006 and 2012 to impact wetlands for the construction of a driveway and single family residence. However, these permits have expired and new permits are required.

Project proponents developing on potential wetlands should visit our website <https://www.spl.usace.army.mil/Missions/Regulatory/Permit-Process.aspx> for more information on the permit process. We recommend project proponents complete a jurisdictional delineation (identifying and locating the geographic boundaries of jurisdictional Waters of the United States (including wetlands) on a property) and request a jurisdictional determination from the Corps to determine whether those areas are regulated by the U.S. Army Corps of Engineers under section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act. Receiving a jurisdictional determination is recommended when planning a project. The minimum standards for jurisdictional delineation reports are found here: https://www.spl.usace.army.mil/Portals/17/docs/regulatory/Permit_Process/Final%20Delin%20Report%20Standards%203-16-2017.pdf?ver=2017-03-24-115759-277.

Potential permits project proponents may apply for are Nationwide Permits (NWP). NWPs are for activities that will result in no more than minimal individual and cumulative adverse environmental effects. Here is a link to the current list of NWPs: https://www.spl.usace.army.mil/Portals/17/docs/regulatory/Permit_Process/Summary_Table_Final_2017%20NWPs_Jan%202017.pdf?ver=2018-06-21-171453-850. Permit applications (ENG4345 and PCN Form) are found on our website. Our permits have no fees. Our permits do require a 401 Water Quality Certification from the Regional Water Quality Control Board. Project proponents should contact the Lahontan Regional Water Quality Control Board for more information on the 401 WQC permit process.

I'm the primary POC for Mono County and project proponents can contact me with any questions.

Let me know if you have any questions.

Thanks,

Jerry Hidalgo
 Project Manager
 Regulatory Division, North Coast Branch
 Los Angeles District, U.S. Army Corps of Engineers
 60 South California Street, Suite 201
 Ventura, California 93001-2598
Gerardo.L.Hidalgo@usace.army.mil

Office: 805-585-2145
 Government Mobile: 213-320-8992

CDFW COMMENT

From: [Wildlife LSA](#)
To: [Kelly Karl](#); [Wildlife LSA](#)
Subject: RE: Lake and Streambed Alteration Consultation Request (Mono County)
Date: Thursday, December 24, 2020 11:46:08 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kelly,

Thank you for contacting CDFW. Not being familiar with the natural resources or landscape in the area you described I could not provide an answer to whether or not the project would require a Lake and Streambed Alteration Agreement (LSA). My advice would be to have landowner submit an LSA notification to the Regional CDFW serving the area; that way the applicant would be covered under [Fish and Game Code 1602](#). If the project ends up not needing a permit, the Regional staff would provide a letter stating so.

As for how CDFW would like to be notified moving forward. CDFW recently converted to a completely online system for receiving LSA notifications and issuing LSA Agreements (permits) called EPIMS. Below is a link to the EPIMS website which provide enough information on the program to help you create your handout.

<https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>

I also wanted to add that I really appreciate the proactive approach you are utilizing. One thing I would like to suggest is to add a simple question on the county permit for applicants with streams on or around their projects.

Have you applied for or received a Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife?

Happy Holidays!

Jason Faridi

Senior Environmental Scientist (Specialist)
Lake and Streambed Alteration Program - Sacramento
Jason.Faridi@wildlife.ca.gov

ATTACHMENT 6: PUBLIC COMMENT (RECEIVED BY FEBRUARY 10)**COMMENT #1**

From: [Sharon Shaw](#)
To: [Kelly Kari](#)
Subject: Re: Use Permit20-006/Schott & Reedy
Date: Tuesday, February 9, 2021 12:37:26 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Commission Members,

My additional comments regarding the Use Permit20-006/Schott & Reedy property are as follows:

Having been informed at the last zoom meeting I attended that this permit is almost certainly going to be issued, I think that will send the wrong message to violators. It says do whatever you want and if you don't get caught that's great, but if you do get caught, no problem we will let you do it anyway. The first notice sent to these property owners was the correct solution. Take the building down that was illegally constructed and start over again following the codes and laws that are written to protect the community.

Hopefully the planning commission will set an example here instead of saying it's all right to ignore our codes and laws that protect the safety of others. If the owners are allowed to finish this shed instead of taking it down, why do we have the codes and laws in the first place?

Thank you

Sharon Shaw

From: [Wendy Sugimura](#)
To: [Michael Draper](#); [Laura Stark](#)
Subject: FW: Reedy/Schott matter on Planning Committee Agenda August 1, 2022
Date: Monday, August 1, 2022 8:22:32 AM

FYI, for LDTAC today.

Wendy Sugimura

Community Development Director
(760) 924-1814

From: Sharon Shaw <sshaw3243@gmail.com>
Sent: Friday, July 29, 2022 1:15 PM
To: Wendy Sugimura <wsugimura@mono.ca.gov>
Cc: Rhonda Duggan <rduggan@mono.ca.gov>; Tim Sanford <tbsanford@timothysanfordlaw.com>
Subject: Reedy/Schott matter on Planning Committee Agenda August 1, 2022

[EXTERNAL EMAIL]

Hello Wendy,

In case I would be unable to connect to the Zoom meeting on Monday, I wish to have my comments received by the Committee. I am also copying my County Supervisor Rhonda Duggan and my personal attorney Timothy B. Sanford on this email.

My husband Gordon and I oppose allowing overhead power to the Reedy/Schott property based on the additional fire danger to our adjacent property. It is our understanding that approval of overhead power is not standard for Mono County and the owners of this property could have run underground power when they had their entire driveway dug up to install sewer lines to Crowley Lake Drive. They state there are other pole lines in the area, which is probably true but we assume not for new construction. We have underground power and our home was built in 1982. Every one of our near by neighbors have underground power to their homes as well. It is a huge leap to believe that these power lines will be maintained by the homeowner as SCE is requiring. Allowing overhead power lines to be installed in this day and age when major power companies in this state are spending billions of dollars to install underground power lines due to the extreme fire danger we all live with daily seems insane to us.

The shed (which has now been present for eighteen plus months) and should not have been built to start with is still not completed. After the last request made by Reedy/Schott to be allowed to place an RV on the property during construction, it was our belief that the shed needed to be completed. Does the shed ever have to be completed?

Thank you for your time once again.

Sharon Shaw, Adjacent Homeowner

Michael Draper

From: Jim Kozak <jimk@strategicland.net>
Sent: Monday, August 1, 2022 10:44 AM
To: Wendy Sugimura; Michael Draper
Cc: Rhonda Duggan
Subject: LDTAC Meeting August 1, 2022 Opposition to Agenda Item 3.A

Follow Up Flag: Follow up
Flag Status: Flagged

Some people who received this message don't often get email from jimk@strategicland.net. [Learn why this is important](#)

[EXTERNAL EMAIL]

Ms. Sugimura and Mr. Draper and Members of the LDTAC:

Please read this e-mail into the record that as an adjacent property owner at 257 Juniper Drive Crowley Lake, CA I, James Kozak and my wife Rhana Kozak are opposed to any approval of the Application being reviewed per your Agenda Item 3.A Use Permit Schott & Reedy as it relates to allowing overhead power lines to or on this property.

To further increase fire risk to adjacent properties and potential loss of life in this area when underground options are available is unconscionable.

Additionally, I did not see a staff report on this application online that showed any analysis to evaluate other options.

I strongly recommend you either reject this application outright due to the increased liability this creates for the County per the State Drought Fire Risk guidelines we are in, or pause making a decision until a more detailed analysis is completed reviewing the options available.

Thank You,

James and Rhana Kozak
257 Juniper Drive
Crowley Lake, CA 93546



STRATEGIC LAND PARTNERS L.P.

James M. Kozak, President

505 Lomas Santa Fe Drive, Suite 230
Solana Beach, CA 92075

Phone: (858) 699-7440

Fax: (858) 523-0826

E-Mail: jimk@strategicland.net

Web: www.strategicland.net

Privileged And Confidential Communication.

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Please consider the environment before printing this e-mail.

Michael Draper

From: Chief Vince Maniaci <longvalleyfd@gmail.com>
Sent: Monday, September 19, 2022 1:31 PM
To: Michael Draper
Subject: Reedy Schott

You don't often get email from longvalleyfd@gmail.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

The Long Valley Fire Protection District is opposed to the overhead line being installed at the Reedy/Schott parcel(3858 CLD). The client was able to trench for water and sewer from driveway/Crowley Lake Dr. within the right of way and the District would rather see the continued use of underground services rather than above ground power due to fire threat. Thank you,

--

Chief Vince Maniaci
3605 Crowley Lake Drive
Crowley Lake, Ca. 93546



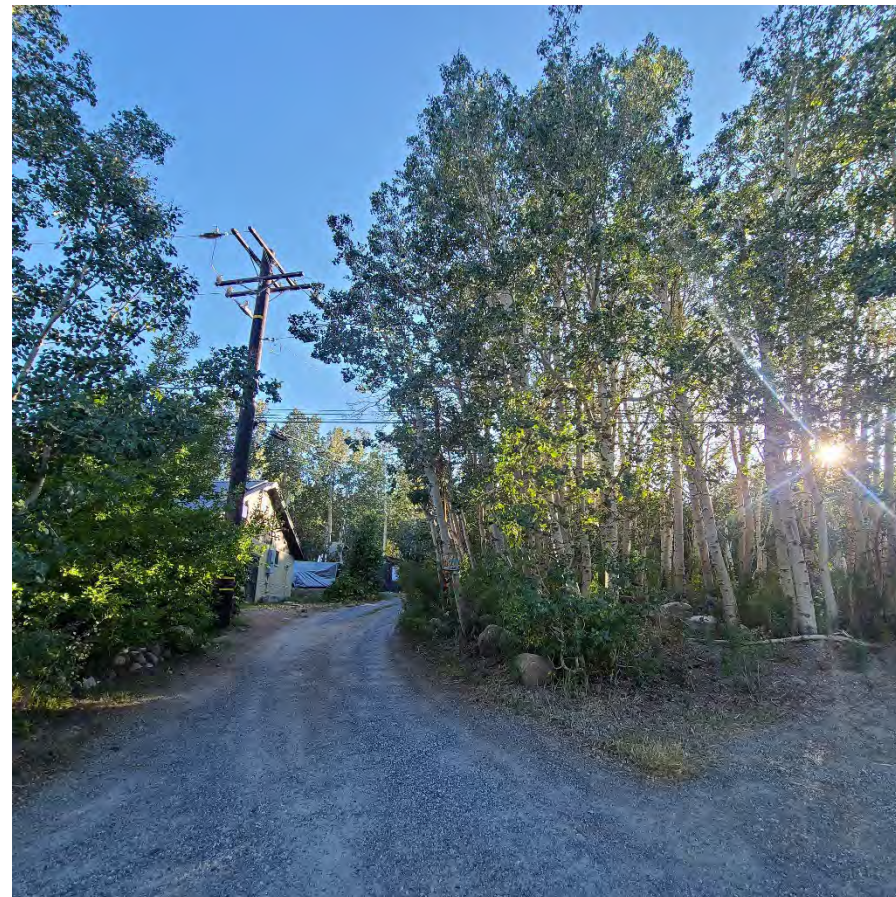




1 & 2 – The pictures show land west of Crowley Lake Drive where the applicant would be required to underground. Aboveground communication lines and poles exist already, and the area is characterized by moist soils.



3 – The picture is approximately 250' south of the project parcel, along the west side of Crowley Lake Drive.



4 – The picture is approximately 400' south of the project parcel at the intersection of Appleton Road and Crowley Lake Drive. The power-pole shown will be the origin of power lines to the applicant's easement.



5 – Looking north on Crowley Lake Drive at the applicant's easements, overhead utility lines cross the road.

6 – 3846 Crowley Lake Drive is approximately 200' north of the applicant's easement and contains overhead communication lines.



FINAL DESIGN

APPROVED FOR CONSTRUCTION

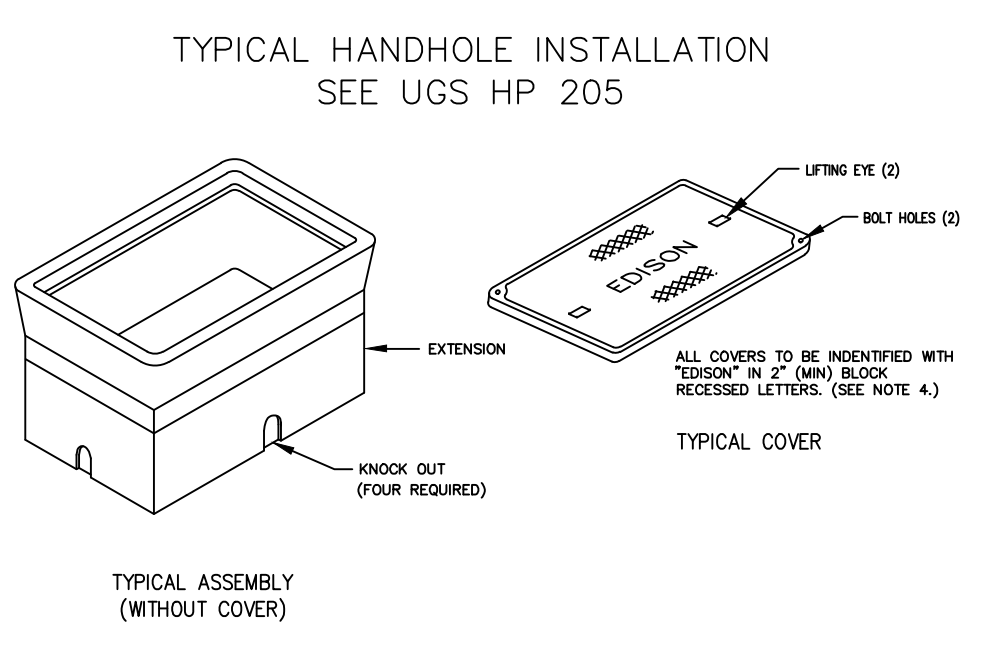
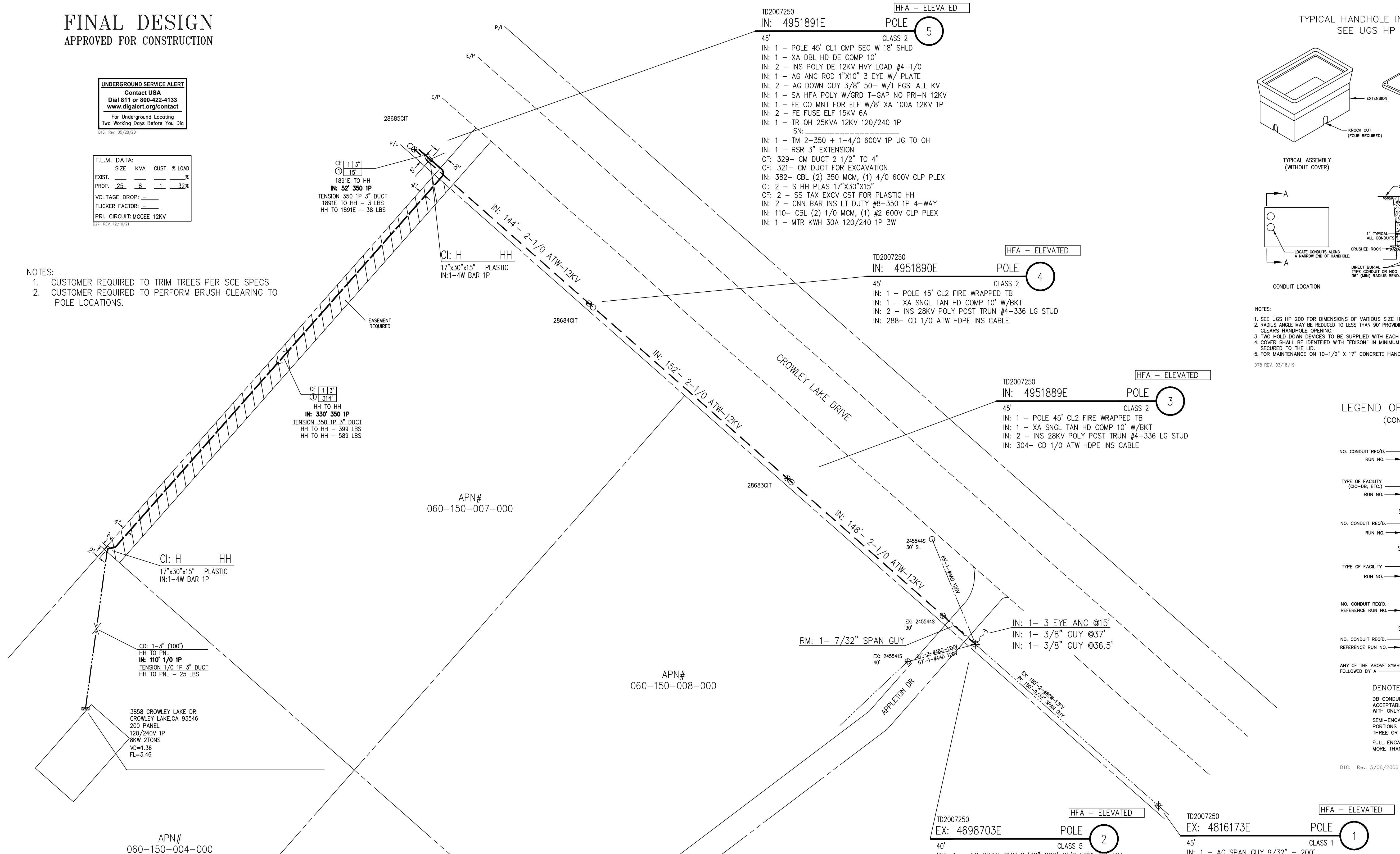
UNDERGROUND SERVICE ALERT
Contact USA
Dial 811 or 800-422-4133
www.digalert.org/contact
For Underground Locating
Two Working Days Before You Dig
D18 Rev. 07/28/20

T.L.M. DATA:

SIZE	KVA	CUST	% LOAD	
EXIST.			%	
PROP.	25	8	1	32%

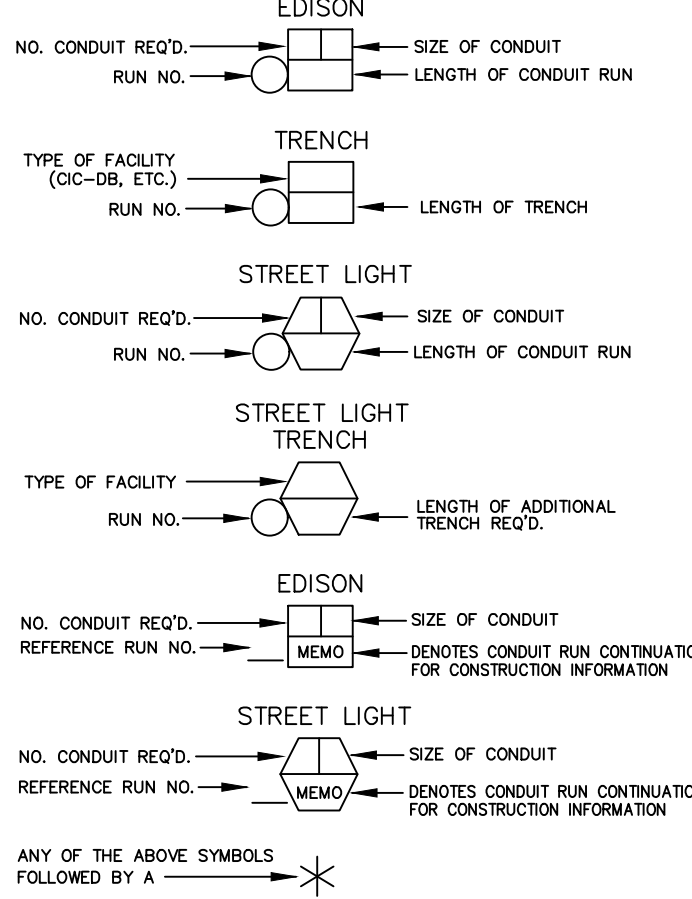
VOLTAGE DROP: —
FLICKER FACTOR: —
PRI. CIRCUIT: MCGEE 12KV
D18 Rev. 12/19/21

- NOTES:
- CUSTOMER REQUIRED TO TRIM TREES PER SCE SPECS
 - CUSTOMER REQUIRED TO PERFORM BRUSH CLEARING TO POLE LOCATIONS.



- CONSTRUCTION NOTES:**
- Unless otherwise specified on the working drawing which forms a part of the specification, the Contractor/Developer shall furnish the following items at no cost to the Edison Company.
Southern California Edison Company has attempted to correctly show all existing utilities and structures in the vicinity of the work, but does not guarantee there are no other structures in the area.
Failure of SEE to show all structures in their correct location will not be a basis for a claim for extra work, and the contractor shall be responsible for all damages to structures whether down or not.
 - FOR GENERAL SPECIFICATIONS SEE UGS 010.
 - CONDUIT:
 - Minimum cover in street or pathway is 30" below gutter grade, unless noted otherwise.
 - Minimum cover on private property is 30" below finished grade, unless noted otherwise.
 - Contractor to furnish and install approved material for conduit specifications per UGS CD 100.1, 110 AND 120.
 - For the type of conduit for this job, See UGS CD 100.1.
 - Install all conduits per UGS CD 180, 181, 182 and 170.
 - Cap all monoline conduits per UGS CD 148 and service conduits per UGS CD 150.
 - Install strain conduit stops in all conduits terminating into vaults, manholes, FRWA, SVE's & all cap locations.
 - per UGS CD 180.1 & UGS CD 180.2.
 - Install pull rope in all conduits. Pull rope to be at least 3/8" polypropylene rope, braided or twisted.
 - For specifications, approved mines, and supplies, see UGS G 040.
 - All conduits must be marked with the approved standard UGS CD 197.
 - CONDUIT BEND REQUIREMENTS:
 - The minimum radius for bends are:
 - 90° for conduits 3" in diameter or smaller
 - 45° for conduits 4" and 5" in diameter
 - 60° for 6" diameter conduit
 - The minimum radius for all monoline conduits is 12'-6" (unless noted otherwise).
 - EXCAVATION AND BACKFILL:
 - Work area shall be cleared and rough graded to within four inches of final grade prior to installation of Edison conduit or structures.
 - All excavations shall be in accordance with the California State Construction Safety Orders (when applicable), Edison specifications, and all governing local ordinances.
 - Each trench to be a uniform depth below final grade prior to installation of Edison conduit or structures.
 - Backfill shall be provided by the Contractor for all excavations and shall include crushed rock, concrete, or imported backfill, when required.
 - Backfill with a MINIMUM of one sack per yard sand cement slurry around and over joints and manholes per UGS CD section 4.4 and around Poles within approved by Edison specifications. See UGS CD 001, section 2.2.
 - Backfill per Edison specifications, and immediately follow conduit or structure installation. At no time will loose soil be left exposed over 24 hours.
 - No rocks are allowed within 12 inches of direct-buried cables or any conduit without concrete encasement.
 - Notice backfill capable of passing through a one-inch mesh screen shall be considered to be "rock free," if existing backfill does not pass through a 1/2" screen, even imported sand 3" below and 12" above Edison cables, after this point, no rock larger than 1/2" diameter is permitted.
 - All backfill shall be compacted to meet or exceed local ordinances or other requirements. It shall be placed in a manner that will not damage the conduit or structure or slow future subsidence of the trench or structure.
 - PAVING:
 - Repaving, where required, shall be placed in such a manner that interference with traffic, including pedestrian traffic, will be kept to a minimum. The Contractor shall establish a program of repaving acceptable to the Municipality, County, or other authority having jurisdiction and which is acceptable to Edison.
 - STRUCTURES:
 - All structures shall be constructed or installed to Edison specifications.
 - Install protection barriers per UGS MS 830 when required in areas exposed to traffic, per Edison Inspector.
 - All finished tops and concrete forms/structures shall be marked during the installation and inspection by Edison.
 - All grouting materials shall be furnished and installed by the Contractor.
 - RETAINING WALLS:
 - When required, retaining walls shall be provided by the Developer. Walls are required wherever grade rises more than 18 inches above the structure or 24" above the top surface of a distance of 5 feet from the same, in areas subject to erosion. Design and materials must comply with local building ordinances. Refer to Edison Inspector for typical space requirements.
 - PERMITS:
 - All permits necessary for excavation shall be provided by the Contractor/Developer.
 - ACCESS:
 - Heavy truck access shall be maintained to equipment locations. Structures must be clear of all obstructions that would obstruct the loading or unloading of equipment.
 - SERVICES:
 - Materials and services shall comply with Edison Electrical Services Requirements.
 - Work must be in accordance with applicable local ordinances and approved by local Inspection Authorities.
 - LOCATION:
 - The location of excavations and structures for Edison shall be as shown on the working drawing. No deviation from the planned locations will be permitted unless approved by the Edison Inspector. See UGS CD 001, section 2.2.
 - Actual location of distributions, storm drains, and/or other foreign utilities to be the responsibility of the Contractor. See UGS CD 001, section 2.3.
 - Contractor is to verify location and widths of all sidewalks and driveways prior to street light installation. See UGS CD 175.1, UGS CD 175.2 and UGS CD 175.3.
 - SURVEY:
 - Surveying of street improvements, property corners, lot lines, finished grade, etc., necessary for the installation of underground facilities must be completed and marked or staked placed prior to the start of the installation. In addition, Developer shall maintain the markers during the installation and inspection by Edison. Grade and property line stakes must show any offset measurements.
 - COORDINATION AND SUPERVISION:
 - When required, retaining walls shall be provided by the Developer. Walls are required wherever grade rises more than 18 inches above the structure or 24" above the top surface of a distance of 5 feet from the same, in areas subject to erosion. Design and materials must comply with local building ordinances. Refer to Edison Inspector for typical space requirements.
 - TELEPHONE AND OTHER UTILITY REQUIREMENTS:
 - The drawing prepared for this job may also cover the facilities to be installed for the telephone company and/or other utility. Any questions concerning details of their installation should be referred to the company concerned.
 - OWNERSHIP:
 - Developer is to deed to the Edison Company all structures shown herein except those shown as customer owned.
 - WARRANTY:
 - Applicants expressly represent and warrant that all work performed and all material used in meeting Applicants' obligations herein are free from defects in workmanship and are in conformity with Southern California Edison Company's requirements. This warranty shall commence upon receipt by Applicants of Company's final acceptance and shall expire one year from that date. Applicants are to promptly correct to the Company's satisfaction, and that of any governmental agency having jurisdiction and at Applicant's expense any breach of this warranty which becomes apparent through inspection or operation of underground electric system by Company during this warranty period.
 - INSPECTION:
 - Inspection is required during the construction period. A 48-hour advance notice of intent to start construction is required from the contractor to the Southern California Edison Company. Standards of Edison construction materials are available upon request.

LEGEND OF CONDUIT SYMBOLS (CONVENTIONAL U. G.)



EDISON
SIZE OF CONDUIT
LENGTH OF CONDUIT RUN

TRENCH
LENGTH OF TRENCH

STREET LIGHT
SIZE OF CONDUIT
LENGTH OF CONDUIT RUN

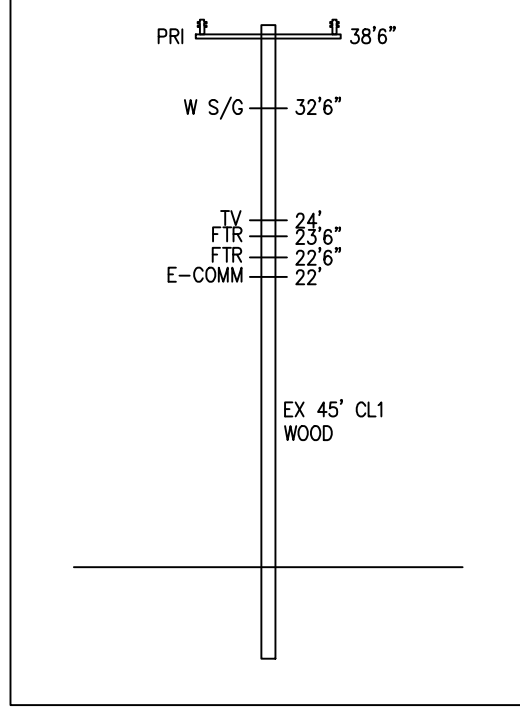
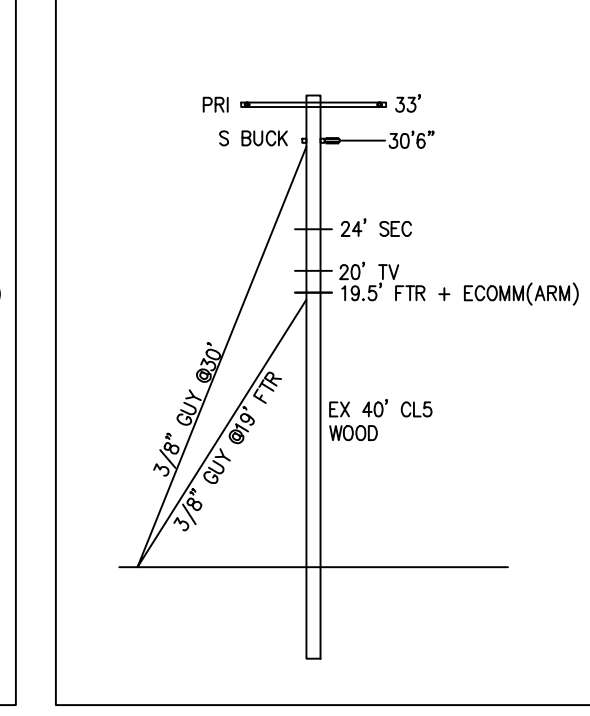
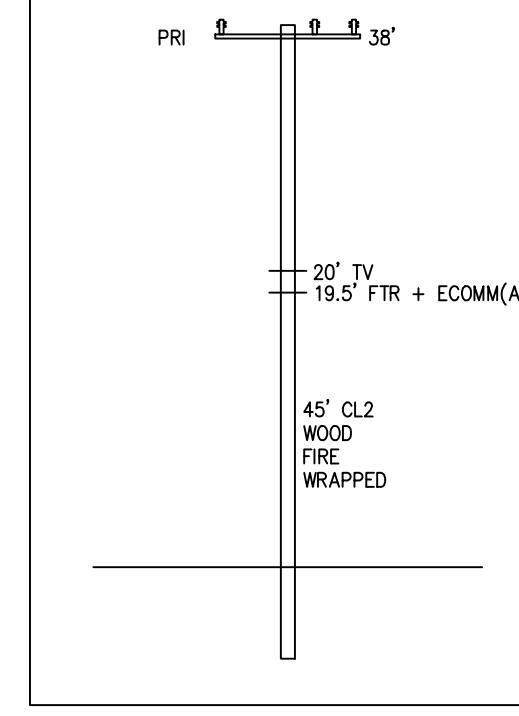
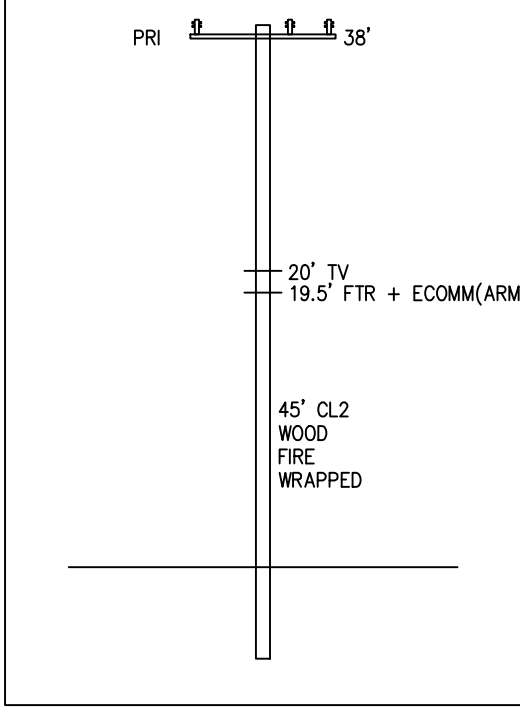
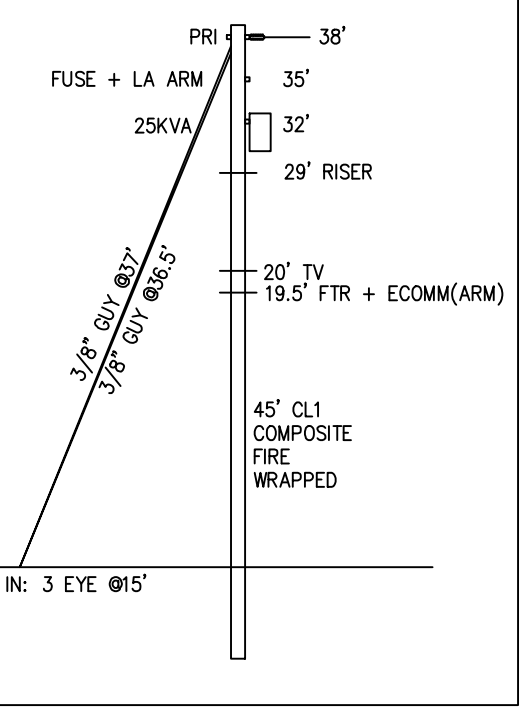
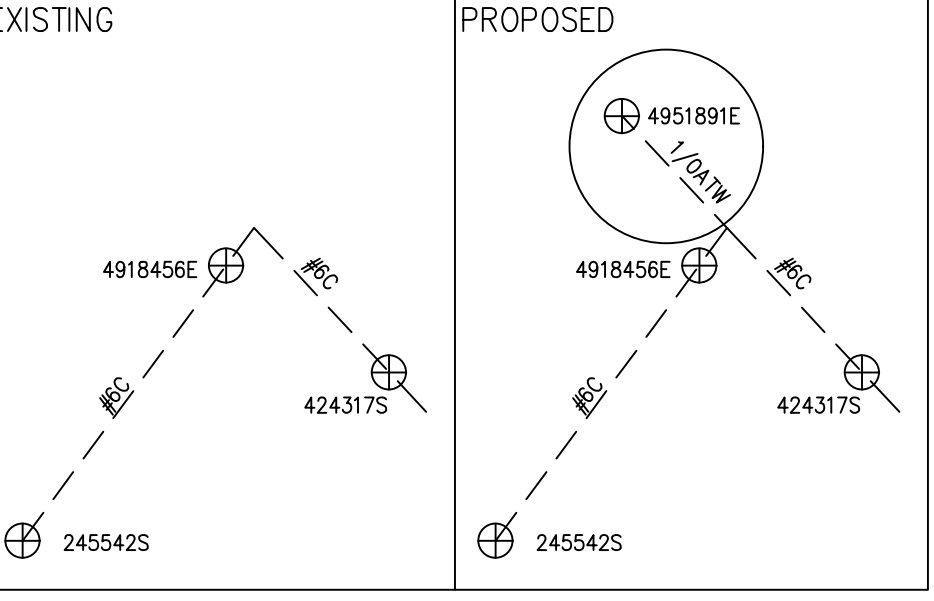
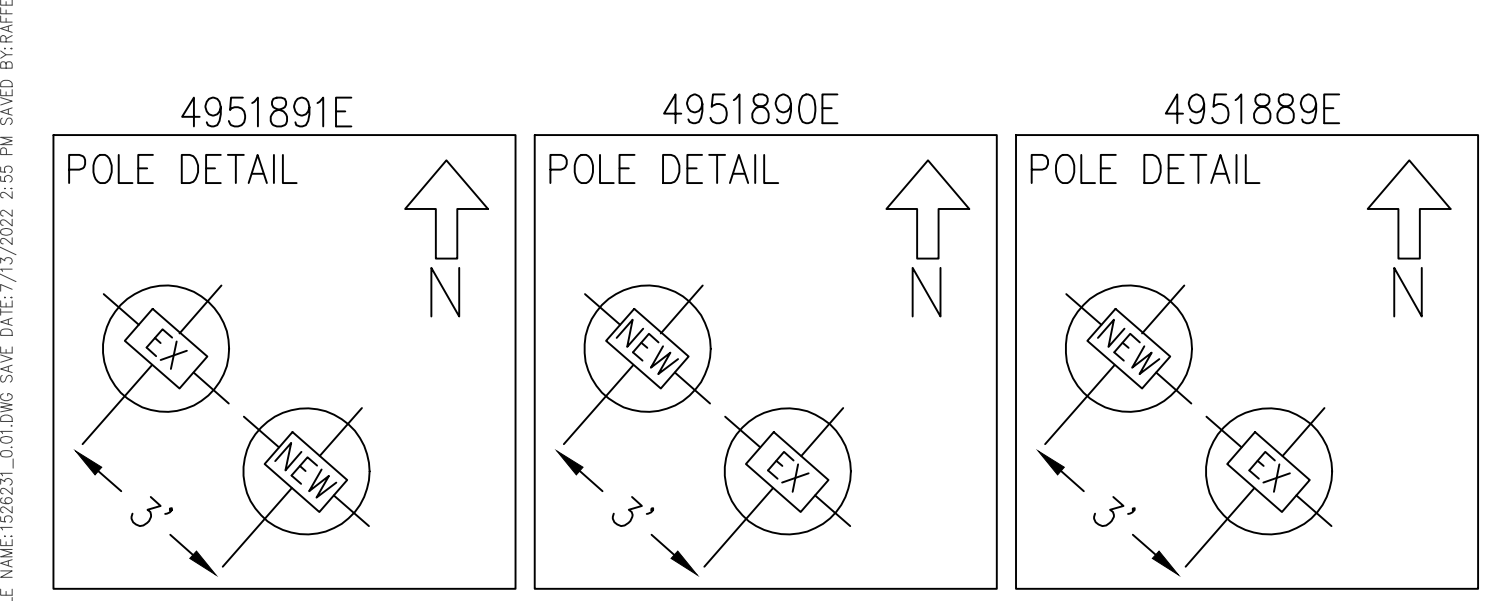
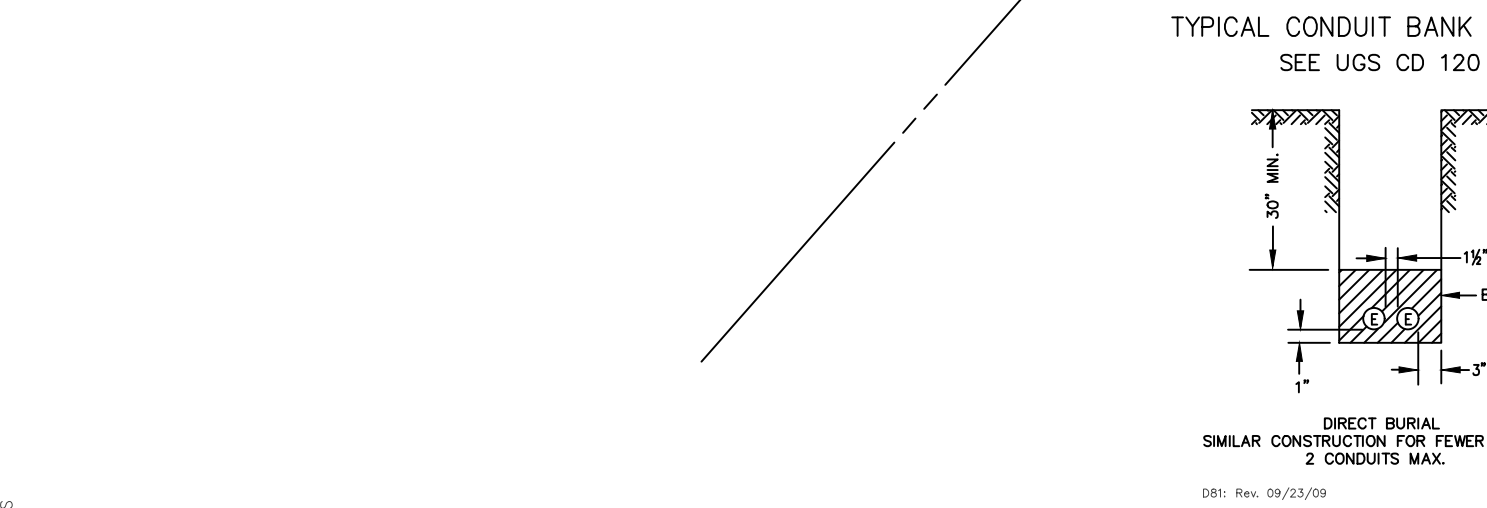
EDISON
SIZE OF CONDUIT
LENGTH OF ADDITIONAL TRENCH REQ'D.

EDISON
SIZE OF CONDUIT
DENOTES CONDUIT RUN CONTINUATION FOR CONSTRUCTION INFORMATION

STREET LIGHT
SIZE OF CONDUIT
DENOTES CONDUIT RUN CONTINUATION FOR CONSTRUCTION INFORMATION

ANY OF THE ABOVE SYMBOLS FOLLOWED BY A * DENOTES THE FOLLOWING:
DB CONDUIT WITHOUT ENCASEMENT IS ACCEPTABLE FOR PORTIONS OF TRENCH WITH ONLY ONE OR TWO CONDUITS
SEM-ENCASEMENT IS REQUIRED FOR PORTIONS OF TRENCH WITH ONLY THREE OR FOUR CONDUITS
FULL ENCASEMENT IS REQUIRED FOR MORE THAN FOUR CONDUITS

D18 Rev. 5/08/2006



#4951891E
N 37 33.959
W118 44.324

#4951890E
N 37 33.976
W118 44.902

#4951889E
N 37 33.943
W118 44.878

#4698703E
N 37 33.943
W118 44.855

#4816173E
N 37 33.928
W118 44.830

LEGEND CODE DEFINITIONS

- ED - CUSTOMER CONTRACTOR INSTALLED, MATERIALS FURNISHED AND INSTALLED BY APPLICANT AT OWNERS EXPENSE AND HE DEEDS TO EDISON. (EXCEPTION: STREET LIGHT ELECTROLES WILL BE INSTALLED BY EDISON'S CONTRACTOR)
- CO - CUSTOMER CONTRACTOR OWNED, MATERIALS FURNISHED, INSTALLED, OWNED AND MAINTAINED BY APPLICANT.
- CF - CUSTOMER CONTRACTOR FURNISHED, MATERIALS FURNISHED AND INSTALLED BY APPLICANT'S EXPENSE THAT MAY BE DEEDS TO EDISON.
- IN - INSTALL MATERIALS FURNISHED AND INSTALLED BY APPLICANT IF APPLICANT INSTALLED PROJECT OR BY EDISON IF EDISON INSTALLED PROJECT. (EXCEPTION FOR AN APPLICANT INSTALLED LINE EXTENSION STATION WILL BE HAVING AN EXISTING ADJACENT TO AN "N" LEGEND CODE REPRESENTS MATERIALS TO BE PROVIDED BY APPLICANT AND INSTALLED BY EDISON IN ALL CASES REFER TO UGS 008 PROJECT MATERIALS LIST BY ASSEMBLY WITHIN A STATION)
- W - WOOD INSTALLED SAME AS IN-WRAPPED
- RM - MEMO REMOVED, MATERIALS REMOVED BY EDISON.
- S - SHOULY IN MATERIALS FURNISHED AND INSTALLED BY EDISON FOR TEMPORARY CONSTRUCTION.
- SR - SHOULY REMOVE, MATERIALS REMOVED BY EDISON FOR TEMPORARY CONSTRUCTION.
- TR - TRANSFER, EDISON LABOR REQUIRED TO TRANSFER EXISTING FACILITIES.

D18 Rev. 07/29/16

PROJECT REQUIREMENTS (Y/N)

EDISON EASEMENT REQUIRED	<input checked="" type="checkbox"/>
PWRD BS REQUIRED	<input checked="" type="checkbox"/>
UG CIVIL ONLY WORK ORDER	<input checked="" type="checkbox"/>
PERMIT REQUIRED	<input checked="" type="checkbox"/>
PERMIT TYPE: MONO COUNTY	<input checked="" type="checkbox"/>
OUTAGE REQUIRED	<input checked="" type="checkbox"/>
OUTAGE DATE: _____ TIME: _____	
TRAFFIC CONTROL REQUIRED	<input checked="" type="checkbox"/>
PED. TRAFFIC CONTROL REQ'D	<input checked="" type="checkbox"/>
CONVEYANCE LETTER REQ'D	<input checked="" type="checkbox"/>
ENVIRONMENTAL REQUIREMENTS DOCUMENT (ERD) REQUIRED	<input checked="" type="checkbox"/>
CSD 140 (TLM) REQ'D	<input checked="" type="checkbox"/>
DIG ALERT APP	<input type="checkbox"/>
VERIFIED ACTIVE AND CONFIRMED USA TICKETS	<input type="checkbox"/>
UTILITYQUEST NOTIFIED	<input type="checkbox"/>
STANDARD ADHERENCE: 2_Q/2022_Y	

D18 Rev. 10/21/21

DISTRICT	PROJ. MGR.	PLANNER	DESIGNER
BS - BISHOP	RAFFERTY, TIMOTHY S	RAFFERTY, TIMOTHY S	RAFFERTY, TIMOTHY S

PROJECT NO.	SERVICE REQUEST	MSR NO.	PHONE
2444204	3334295	2007250-LINE EXTENSION	7608732902

CIRCUIT / VOLTAGE	GPS	PRODUCT-1	ASSOC DESIGN
		2007250-LINE EXTENSION	

SUB / PG NO.	CIRCUIT CODE	PRODUCT-2	ASSOC DESIGN

INVENTORY MAP	J.P.A. NO.	PROPOSED CONSTRUCTION (LOCATION)
		3858 CROWLEY LAKE DR CROWLEY LAKE CA 93546

TYPE	DATE	APPROVED BY	CHECKED BY	DRAWN BY	FAX #	SHEET	DESIGN/DRWG NO.
						# of ##	1526231_0.01

Southern California Edison Company

Mono County Planning Division*: Current Projects

Sept. 27, 2022

*Does not include transportation, LAFCO, building, code compliance, etc. projects

Completed Projects		
Permit Type	Community	Description
LLA	Virginia Lakes	adjust lot line
DR	Sunny Slopes	Stream setback reduction
Map Correction	June Lake	Consistency with approved variance
Appeal	June Lake	short-term rental of two out of four units
Accessory Dwelling Units (ADUs)	Countywide + Mammoth Lakes	Prescriptive designs for study, 1 & 2 bedroom ADUs

Active Planning Permit Applications		
Permit Type	Community	Description
GPA/SP/Cnnbs UP	Tri-Valley	cannabis cultivation, convert RR to AG
GPA	Bridgeport	STR compliance case, convert MFR-M to MU
GPA/UP	Mono Basin	waste transfer station
CEQA	Mono Basin	Mono County waste management transition
GPA/SP	Mono Basin	STRs & campground
SP Amendment	Paradise	RV/campground, commercial ag
UP/Cannabis	Antelope Valley	cultivation, distribution, non-storefront retail
UP	Crowley Lake	overhead line installation
UP	Long Valley	limited-scale lodging/resort
UP	Walker	overhead line installation
UP	June Lake	installation of spa
UPM	Coleville	Cell tower extension
UP	Chalfant	new 80' cell tower
DR	Lee Vining	OH lines over Lee Vining Creek
DR	June Lake	Parking Management Plan
Map Modification	Tri-Valley	
DR/VHR	Topaz	Transient Rental on Mixed Use LUD
LLA	Lee Vining	adjust lot line
LLA	Bridgeport	adjust lot line

Active Policy/Planning Projects		
Name	Community	Description
Study Impacts of Short-Term Rentals on workforce housing	Countywide	Report to Board by December 2022
Housing project negotiations	June Lake	Directed by CAO with Board guidance, respond to developer's request to negotiate for County participation to construct 12 housing units
Prescriptive designs for detached garages	Countywide	Update prescriptive designs for garages
North County Water Transfer	North County	Policies applicable to programs to sell/lease water for the benefit of Walker Lake
Housing Policy	Countywide	Housing Element tracking and policy development per Board's direction
Special District Study	Countywide	Work initiating
US 395 Wildlife Crossings	Long Valley	Project committee to construct wildlife crossings on US 395; Caltrans lead

Active Policy/Planning Projects

June Lake Active Transportation Plan	June Lake	Fall workshop on recommendations
West Walker River Parkway	Antelope Valley	Grant application not awarded, focusing on finalizing plan
Revision to Chapter 11	Countywide; Antelope Valley	Review and revise utility undergrounding policies and requirements
Cannabis Odor Standards	Countywide	Low priority, readings to be taken with Nasal Ranger this spring and fall
Annual General Plan Update	Countywide	Continuously track minor changes for an annual update
Update General Plan Map Layers	Countywide	Update online

Acronyms:

AG	Agriculture
CEQA	California Environmental Quality Act
DR	Director Review
GHG	Greenhouse Gas
GPA	General Plan Amendment
LLA	Lot Line Adjustment
LUD	Land Use Designation
MFR-M	Multi-Family Residential - Medium
MU	Mixed Use
RR	Rural Residential
SP	Specific Plan
STR	Short-Term Rental
UP	Use Permit
VHR	Vacation Home Rental
VMT	Vehicle Miles Traveled