October 2020
Central Valley Ag Group Bulk Whole Cottonseed Transload Facility

Final Initial Study/Mitigated Negative Declaration for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton

Prepared for
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1 Final Initial Study/Mitigated Negative Declaration

This Final Initial Study/Mitigated Negative Declaration (IS/MND) is being prepared pursuant to the California Environmental Quality Act (CEQA; Division 13, California Public Resources Code [PRC]).

1.1 Proposed Project

The Port of Stockton (Port) has prepared this Initial Study/Mitigated Negative Declaration (IS/MND) to address the environmental effects of developing a rail-to-truck transload facility for whole cottonseed at the Port (the proposed project). The Port is the lead agency for the proposed project under CEQA).

The proposed project was constructed and became operational in spring 2019. This IS/MND has been prepared to evaluate the impacts of the proposed project as compared to the baseline condition when the project site was developed only with a concrete pad and not operational. CEQA compliance is required for the Central Valley Ag Group (CVAG) to obtain a lease from the Port and a San Joaquin Valley Air Pollution Control District (SJVAPCD) permit for the proposed outdoor stockpile.

1.2 Determination

Based on the analysis provided in this Final IS/MND, the Port finds that the proposed project would not have a significant effect on the environment with mitigation incorporated.

1.3 Final IS/MND Organization

This Final IS/MND has been prepared in accordance with the requirements of CEQA (PRC Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations 15000 et seq.), and it includes the following:

- Section 1: An introduction to the Final IS/MND, including the Port's findings
- Section 2: A summary of public and agency comments received on the Draft IS/MND, including details on distribution of the Draft IS/MND and acknowledgement or responses to comments received
- Section 3: Modifications to the Draft IS/MND (none of which affect the impact determinations presented in the Draft IS/MND)
- Section 4: A summary of mitigation measures, which are unchanged from the Draft IS/MND

2 Public and Agency Comments

2.1 Distribution of the Draft IS/MND

In accordance with the CEQA statutes and Guidelines, the Draft IS/MND was circulated for the minimum period of 30 days for public review and comment. The review period began on Friday, May 15, 2020, and ended on Monday, June 15, 2020, for a total comment period of 31 days.

The Draft IS/MND was made available for review at the Port of Stockton (2201 West Washington Street, Stockton, California 95203) and an electronic copy of the Draft IS/MND was available for review at https://www.portofstockton.com/ceqa-documents/. In addition, the Draft IS/MND was filed with the State Clearinghouse (No. 2020050308) and San Joaquin County Clerk.

2.2 Comments and Responses on the Draft IS/MND

During the public review period, responsible agencies and the public had an opportunity to provide written comments on the information contained within the Draft IS/MND. These comments and responses are included in the record and will be considered by the Port during deliberation as to whether necessary approvals should be granted for the proposed project. As stated in Section 21064.5 of the CEQA Guidelines, a project would only be approved when the Port "finds that there is no substantial evidence that the Project will have a significant effect on the environment and that the IS/MND reflects the Lead Agency's independent judgment and analysis."

The Port received five comment letters or emails during the review period from the following entities:

- California Air Resources Board (ARB), submitted in a letter dated June 16, 2020
- Central Valley Regional Water Quality Control Board, submitted in a letter dated June 15, 2020
- SJVAPCD, submitted in a letter dated June 17, 2020
- Sierra Club Delta-Sierra Group, submitted in a letter dated June 14, 2020
- Wilton Rancheria, submitted in an email on May 21, 2020

These comment letters and email are included as Appendix A. The Port acknowledges the comments included with these correspondences. The following subsections summarize key comments and responses. Several comments pertain to CEQA processes (e.g., scoping and Draft IS/MND circulation), while others pertain to specific CEQA resource topics and associated reporting and are organized accordingly. The comments received and responses provided herein do not affect the findings presented in the Draft IS/MND.

2.2.1 CEQA Scoping and Circulation

The Sierra Club Delta-Sierra Group commented that an Environmental Impact Report should be prepared instead of an IS/MND for the proposed project, describing the IS/MND as "deficient in a

number of areas" and noting that "additional environmental analyses and mitigations are necessary to comply with local, regional, and state regulatory guidance." The responses provided herein address the IS/MND topics described by the Sierra Club Delta-Sierra Group as being deficient. The proposed project would comply with all pertinent local, regional, state, and federal regulations as described throughout the IS/MND. With adherence to these regulations, and with implementation of the mitigation measures identified in the IS/MND, the proposed project would result in less-than-significant impacts, and an IS/MND is therefore the appropriate CEQA document.

The Port acknowledges the Sierra Club Delta-Sierra Group's comments expressing perceived deficiencies in the public outreach process. The Port provided adequate public notice of the IS/MND as required by the CEQA Guidelines. Additionally, in response to public requests, the Port posted the Draft IS/MND to the Port's website and sent direct notification to all interested parties. The following public outreach and circulation actions were completed by the Port:

- Posted an electronic copy of the Draft IS/MND to the Port's CEQA webpage
- Ran a notice in *The Record* (daily newspaper serving San Joaquin and Calaveras counties)
- Posted notices of the Draft IS/MND at the Port's main gates and administration building
- Provided a hard copy of the document at the Port's administration building
- Provided notification to recipients on the Port's mailing list of interested parties
- Filed a notice of the Draft IS/MND, Notice of Completion (NOC), and an electronic copy of the Draft IS/MND with the San Joaquin County Clerk
- Filed the NOC, electronic copy of the Draft IS/MND, and summary form with the State Clearinghouse

Each of these notifications clearly alerted parties of the IS/MND's availability in electronic and hard copy format, as well as the method and dates for submitting comments.

The Sierra Club Delta-Sierra Group additionally identifies the Boggs Tract neighborhood and George Washington Elementary School as potentially affected parties requiring notification. Representatives from these parties are not among the Port's mailing list of interested parties. However, the general notification process described herein is intended to communicate the availability of Port CEQA documents to their constituents. The Port has received and acknowledges the contact information provided for reaching the Boggs Tract Community Center Advisory Board.

The Sierra Club Delta-Sierra Group's comments inquire about the availability or public release of several Port or CVAG management plans, including the Bulk Whole Cottonseed Transload Facility Safety Management Plan (SMP), the Port's Storm Water Development Standards Plan, and other "environmental documents that affect soil, water and air quality." CEQA does not require comprehensive public release of proprietary or other management plans. The analysis presented in

the IS/MND provides sufficient information on the components of these plans to support the impact conclusions.

The Port also acknowledges the Sierra Club Delta-Sierra Group inquiry on the availability of facility reports and documentation of facility inspections. CEQA does not require the comprehensive release and circulation of facility reports or inspection documentation. The Port complies with the documentation, reporting, and filing requirements pertaining to facility inspections, including but not limited to ensuring that construction and operation BMPs are implemented.

2.2.2 Project Description

Comments were received from the Sierra Club Delta-Sierra Group regarding the proposed project's operation. Specifically, the comment noted that the proposed project was operational prior to the development of the Draft IS/MND. The Draft IS/MND acknowledges this timeline and accordingly uses a zero baseline, instead of a present-day operational baseline, to ensure that the full extent of the impacts is identified and mitigated for where applicable.

The Sierra Club Delta-Sierra Group also inquired regarding the content of the white and brown piles visible in Photograph 1. The white pile is whole cottonseed, while the brown pile is heat-damaged whole cottonseed. These pile materials are consistent with the descriptions and analyses provided in the Draft IS/MND. This information is also noted in Section 3.

Photograph 1
Aerial Photograph of CVAG Facility

Source: Google Earth aerial provided in letter from Sierra Club Delta-Sierra Group

In consideration of comments from the Sierra Club Delta-Sierra Group, this Final IS/MND notes that if whole cottonseed is improperly managed, there is the potential for dust that could be hazardous. However, as described in the Draft IS/MND, management conditions—including open storage and watering for dust control—are part of the proposed project. Therefore, the potential for dust from whole cottonseed would be minimal. In addition, the proposed project, as described in the Draft IS/MND, entails transloading whole cottonseed; it does not include the types of processing activities that would be more likely to produce high levels of nuisance dust (e.g., cutting, grinding, machining, polishing, sanding). Additional details are provided in Section 3.

In consideration of comments from the Sierra Club Delta-Sierra Group, this Final IS/MND includes the following additional information on management control techniques:

- Whole cottonseed would be tarped during transport.
- The facility would be operated in compliance with federal Occupational Safety and Health Administration (OSHA) or state equivalent regulations pertaining to dust and combustible dust.

These proposed project conditions as they relate to the analysis of hazardous material impacts are described in Section 3. Additional detail on tarping, facility compliance with OSHA regulations, and potentially hazardous conditions from whole cottonseed dust do not change the conclusions in the Draft IS/MND or require additional mitigation measures.

2.2.3 Air Quality

Wind Speed Direction

The Sierra Club Delta-Sierra Group commented on discussions related to prevailing winds. As noted in Section 3.3.3.1.1 of the Draft IS/MND, the discussion of wind direction is specific to the regional setting and is correct as described. As no dispersion modeling was warranted, wind direction was not considered in the analysis completed for the impact determination. Therefore, no changes to the information presented in the Draft IS/MND are required.

Operational Assumptions

Comments were received from the Sierra Club Delta-Sierra Group regarding travel assumptions related to truck and rail trips, noting that the air quality analysis did not assume emissions from truck and rail travel outside of the Port. Those comments are incorrect. The air quality analysis assumed truck travel of 80 miles (per each one-way trip) and rail travel of 60 miles (per each one-way trip) as part of the proposed project. No changes to the information presented in the Draft IS/MND are warranted. The modeling files are included as Appendix B to the Final IS/MND.

The Sierra Club Delta-Sierra Group had comments regarding the assumptions used to develop the annual throughput and maximum day scenarios. As discussed in the Draft IS/MND, the maximum day was included for informational purposes only. SJVAPCD does not have maximum day significance criteria; therefore, a significance finding cannot be made. Further, per the Draft IS/MND, the maximum day may occur periodically, but the annual throughput levels are correct as disclosed in the Draft IS/MND. Therefore, no changes to the information presented in the Draft IS/MND are warranted.

Health Risk

Comments were received from ARB and SJVAPCD requesting that a project-specific health risk assessment (HRA) be completed. Neither CEQA nor SJVAPCD require that project-specific HRAs be conducted for every proposed project. As identified in SJVAPCD's CEQA guidelines, a significant impact would occur if a project would emit toxic air contaminants (TACs) that could cause a significant increase in health risks, including both carcinogenic and non-carcinogenic risks. A project is considered to have a significant TAC impact if it would:

- Result in ground-level concentrations of carcinogenic TACs that would increase the probability of contracting cancer for the maximally exposed individual by 20 in 1 million or more (SJVAPCD 2015)
- Increase ground-level concentrations of non-carcinogenic TACs that would result in an acute or chronic hazard index exceeding 1 for the maximally exposed individual receptor (SJVAPCD 2015)

The Draft IS/MND addressed the proposed project's potential for health risk impacts in light of these thresholds and provides the Port's rationale as the lead agency as to why the proposed project would be below such thresholds. The Draft IS/MND explained that the proposed project's emissions—including TACs (namely diesel particulate matter [DPM]), which drive health risk—are low and do not warrant a project-specific HRA. As shown in Tables 4 through 6 of the Draft IS/MND, operational activities would result in particulate matter (PM) emissions that would be several orders of magnitude below SJVAPCD's regional and localized thresholds (the proposed project would generate 0.38 ton per year as compared to SJVAPCD's threshold of 15 tons per year). PM emissions include exhaust, fugitive dust, and road dust. DPM is associated with diesel engine exhaust and is a subset of the proposed project's PM emissions. Therefore, DPM emissions associated with the proposed project's activities would be even lower than the PM emissions presented in Tables 4 through 6 of the Draft IS/MND. In addition, per ARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (ARB 2005), impacts associated with DPM subside to ambient levels within 1,000 feet of a large emission source. As provided in the Draft IS/MND, the closest sensitive receptors to the proposed project would be 2,800 feet away.

SJVAPCD's comment recommends that a screening analysis be conducted for health risk and identifies the California Air Pollution Control Officers Association's (CAPCOA's) 2016 Prioritization Guidance and SJVAPCD's Prioritization Calculator as appropriate methodologies (CAPCOA 2016; SJVAPCD 2020). The CAPCOA methodology is not appropriate for the type of emissions sources associated with the proposed project. CAPCOA's Prioritization Guidance is intended as a screening methodology for facilities subject to Assembly Bill 2588 and is not intended to provide a screening methodology for mobile sources. Because nearly all proposed project emissions would occur from mobile sources such as locomotives and trucks, CAPCOA's Prioritization Guidance would not provide a useful screening tool in determining health impacts from these sources.

The Port, through looking at the levels of DPM and distance to the nearest receptors, has provided an appropriate screening analysis for the proposed project. The Draft IS/MND assessed potential risk as a whole and determined that the proposed project's low emissions and the large separation distance from sensitive receptors do not warrant a quantitative HRA.

For the aforementioned reasons, no changes to the information presented in the Draft IS/MND are warranted.

Mitigation Measures

Comments were received from ARB, SJVAPCD, and the Sierra Club Delta-Sierra Group requesting the Port require additional mitigation measures to address air quality impacts. As noted by the commenters, impacts are less than the significance criteria issued by SJVAPCD. Because mitigation is not required under CEQA when impacts are less than significant (CEQA Guidelines 15050[b][1]), no additional mitigation is required or included.

Cumulative Impacts

Comments were received from ARB, SJVAPCD, and the Sierra Club Delta-Sierra Group requesting further analysis related to the potential for cumulative impacts. As noted in the Draft IS/MND, criteria pollutant emissions would be less than significant and therefore would not contribute to significant cumulative impacts. As noted in "Operational Assumptions" (page 5), the analysis was not restricted to on-site emissions and therefore no additional modeling is required.

2.2.4 Greenhouse Gas Emissions

Comments were received from the Sierra Club Delta-Sierra Group regarding travel assumptions related to truck and rail trips and noting that the greenhouse gas (GHG) emissions analysis did not assume emissions from truck and rail travel outside of the Port. These comments are incorrect. Consistent with the air quality analysis, the GHG emissions analysis assumed truck travel of 80 miles (per each one-way trip) and rail travel of 60 miles (per each one-way trip) as part of the proposed project. No changes to the information presented in the Draft IS/MND are warranted.

The Sierra Club Delta-Sierra Group comments also suggested that the mitigation included in the Draft IS/MND to address GHG emissions was not valid because there was no mitigation plan. Consistent with the requirements of CEQA, a Mitigation Monitoring and Reporting Program (MMRP) would be developed in conjunction with the Final IS/MND. The MMRP will be presented to the Board of Harbor Commissioners for consideration along with the Final IS/MND. Therefore, no changes to the information presented in the Draft IS/MND are warranted.

2.2.5 Hazardous Materials

Dust Hazards

Comments were received from the Sierra Club Delta-Sierra Group noting that a safety data sheet (SDS) is available describing whole cottonseed as susceptible to combustion or explosion under certain circumstances, a mechanical eye irritant, and a cause of breathing difficulties if inhaled. However, as described in the Draft IS/MND, management conditions, including open storage and watering for dust control, are part of the proposed project, and therefore the potential for dust from whole cottonseed would be minimal. Further, the proposed project, as described in the Draft IS/MND, does not entail specific types of processing activities that generate high levels of nuisance dust (e.g., cutting, grinding, machining, polishing, sanding).

It is inferred that the Sierra Club Delta-Sierra Group comment letter refers to a 2016 SDS authored by Suwanee Valley Feeds, LLC (Suwanee Valley 2016). This SDS states that "[whole cottonseed] grain is generally considered not hazardous but dust generated through downstream activities that may reduce its particle size (e.g., shipping, handling, transfer to bins, etc.) may create a hazardous condition." Per the SDS (Suwanee Valley 2016), hazardous conditions include susceptibility to combustion if small particles generated during processing are exposed to an ignition source, flash fire or explosion if grain dust is suspended in air, or an explosion if in a confined situation. Similarly, the SDS identifies dust from particulates as a mechanical eye irritant, and excessive inhalation is described as possibly affecting the nose, throat, and lungs.

The aforementioned combustion and physical irritant traits described for dust from whole cottonseed are also characteristic of other materials with fine particulate sizes (including otherwise nonhazardous materials) and are not necessarily tied to whole cottonseed material itself. OSHA identifies a variety of industries at risk of dust explosion hazards, including "agriculture, chemicals, food (e.g., candy, sugar, spice, starch, flour, feed), grain, fertilizer, tobacco, plastics, wood, forest, paper, pulp, rubber, furniture, textiles, pesticides, pharmaceuticals, tire and rubber manufacturing, dyes, coal, metal processing (e.g., aluminum, chromium, iron, magnesium, and zinc), recycling operations, and fossil fuel power generation (coal)" (U.S. Department of Labor 2008). Accordingly, OSHA provides dust control guidelines addressing ignition and injury hazards, and controls may be applicable regardless of the managed material (U.S. Department of Labor 2014). Furthermore, the

proposed project does not include the types of processing activities that would generate high levels of nuisance dust (e.g., cutting, grinding, machining, polishing, sanding), and management methods described in the Draft IS/MND (and relevant regulations) address the potential for dust hazards.

As discussed in the Draft IS/MND, the CVAG facility would implement operational measures that minimize potential dust hazards. Whole cottonseed is stored outdoors, thereby minimizing any explosion or employee exposure hazards. Dust control is provided by tarping piles and applying water when needed. In addition, CVAG maintains an active SMP for its facilities that is designed to minimize the risk of impacts to people and the environment from facility operation.

As described in detail in Section 3, the proposed project operations would comply with federal OSHA or state equivalent regulations pertaining to dust and combustible dust, including but not limited to the following OSHA measures:

- 1910 Subpart D, Walking-working surfaces
  - 1910.22, Housekeeping
- 1910 Subpart E, Exit routes, emergency action plans, and fire prevention plans
  - 1910.38, Emergency action plans
- 1910 Subpart G, Occupational health and environmental control
- 1910 Subpart J, General environmental controls
- 1910 Subpart L, Fire protection
  - 1910.157, Portable fire extinguishers
  - 1910.165, Employee alarm systems
- 1910 Subpart N, Materials handling and storage
  - 1910.176, Handling materials – general
- 1910 Subpart R, Special industries
  - 1910.272, Grain handling facilities

Section 3 also presents how the above-listed federal OSHA measures, or state equivalent measures, were considered as part of the hazardous material impact analysis.

The Sierra Club Delta-Sierra Group letter additionally identifies measures outlined in the California Stormwater Quality Association (CASQA) BMP Handbook as being applicable to the proposed project, including the Fueling Area SD-30 and Stockpile Management WM-3 entries (CASQA 2003, 2012). While CASQA does not have binding jurisdiction over the proposed project, CVAG's SMP and watering and storage methods described in the Draft IS/MND provide equivalent BMPs pertaining to fueling and stockpile management to ensure that significant impacts are avoided. Federally mandated OSHA regulations or state equivalents listed above provide further controls. Therefore, there are no changes to the impact findings presented in the Draft IS/MND.

Transport of Cottonseed

The Sierra Club Delta-Sierra Group also requests additional detail on avoidance of cottonseed deposits during transport and whether the City of Stockton Fire Department has been notified of the potential hazardous associated with cottonseed handling and transport. As noted in Section 3, the Draft IS/MND project description has been updated to acknowledge that all railcars and trucks arriving or leaving the facility with whole cottonseed are tarped. The City of Stockton Fire Department was provided notice of the Draft IS/MND and is equipped to provide emergency response to the industrialized Port, including response to hazards from combustible dust.

As noted in the preceding paragraphs, whole cottonseed is generally considered not hazardous though hazardous conditions may be generated if particle size is reduced and dust is generated. The Draft IS/MND statement "transport of cottonseed by rail and truck would not pose a hazard to any schools because cottonseed is nonhazardous," as identified in the Sierra Club Delta-Sierra Group letter, remains accurate because the analysis assumed inclusion of required operational controls to limit dust, and because transfer and transport of whole cottonseed do not include processing activities with likelihood to generate nuisance dust (e.g., cutting, grinding, machining, polishing, sanding). The use of tarps during transport, as well as adherence with the aforementioned regulations pertaining to dust and combustible dust, would further ensure that potentially hazardous conditions from transport of cottonseed would be minimized or avoided. Because impacts remain less than significant as identified in the Draft IS/MND, additional mitigation is not required.

2.2.6 Transportation/Traffic

Comments were received from Sierra Club Delta-Sierra Group requesting an analysis of the potential for cumulative traffic impacts on the Boggs Tract neighborhood located to the east of the project site. Truck and rail trips are not expected to impact this neighborhood as trucks would not use the local roads but would travel on Navy Drive to access SR-4. As this highway does not experience notable delays, the addition of 11 new truck trips spread over a day would not result in additional congestion. Rail crossings in the vicinity of the Port are grade separated; thus, train movements associated with the proposed project would not result in any crossing delays. Therefore, additional analysis beyond that included in the Draft IS/MND is not warranted.

2.2.7 Tribal Cultural Resources

The emailed comments from Wilton Rancheria included a request to allow Wilton Rancheria tribal representatives to observe and participate in all cultural resource surveys, including initial pedestrian surveys for the proposed project. The Port responded via email informing Wilton Rancheria that there is no ground disturbance (excavation or grading) planned for the proposed project. Site preparation requirements were described in the Draft IS/MND.

3 Modifications to the Draft IS/MND

This section of the Final IS/MND documents changes and additions made to the Draft IS/MND to clarify or add information. This includes the additional information provided in Section 2 in response to public comments, clarification that construction mitigation measures have already been implemented, and the removal of erroneous text from a mitigation measure. Where needed, section numbering has been revised to accommodate the inclusion of additional or clarifying text. Deleted text is marked as ~~strikeout~~ and new text is marked as underlined. Table and section references included in the text below refer to respective items from the Draft IS/MND.

Section 1 Introduction

The proposed project was constructed and became operational in spring 2019. This IS/MND has been prepared to evaluate the impacts of the proposed project as compared to the baseline condition when the project site was developed only with a concrete pad and was not operational. Mitigation measures identified in this IS/MND pertaining to construction have already been implemented. CEQA compliance is required for CVAG to obtain a lease from the Port and a SJVAPCD permit for the proposed outdoor stockpile.

Section 2.4 Proposed Project Operations

Under proposed project operations, CVAG would transload 96,000 tons of cottonseed per year into the Port by rail and out of the Port by truck. The transloading process would happen in accordance with the following steps and using the quantities of vehicles listed in Table 2:

1. Gondola-type railcars would arrive at the project site via manifest rail. Railcars would be moved within the Port by the Central California Traction Company, the Port's short-line operator. All railcars arriving or leaving the facility with whole cottonseed would be tarped.
2. Railcars arriving at the project site would be offloaded by opening one end of the gondola compartment, placing down a ramp and doorholder, and then driving a small front-end loader in and out of the cars. The loader would deposit the cottonseed in the lot.
3. A second, larger front-end loader would stack the offloaded cottonseed in truck-loading piles (approximately 18 feet high) in the yard. The completed piles would be uncovered during the dry season and covered with tarps during the wet season. Piles would include whole cottonseed (white material) and heat-damaged whole cottonseed (brown material).
4. Outbound empty trucks (approximately 16 trucks per day, 20 days per month) would arrive at the project site and would be loaded from the truck-loading piles by a front-end loader. All trucks arriving or leaving the facility with whole cottonseed would be tarped.
5. Limited use of a skid steer would occur to move whole cottonseed within tight spaces in the project site.

6. Limited use of a self-propelled stacker (less than 500 hours annually) would occur to stack whole cottonseed to an approximate height of 25 feet if additional ground space is required.

Section 3.3.3 Air Quality

Section 3.3.3.2 Impact Evaluation

Baseline conditions include a vacant project site without operational conditions and without emissions. The proposed project would generate air emissions from construction and operations. Construction would be conducted over a 2-week period and would not include the use of heavy equipment. The proposed project's operational emissions, shown in Tables 4 and 5, are a result of rail and truck emissions. As discussed in Section 2.4, there would be 80 railcars delivered per month, or eight trains, and 320 truck calls per month. Annually, there would be 96 train trips and 3,840 truck trips. The air quality modeling files are included as Appendix B to the Final IS/MND.

Section 3.3.6 Energy

Section 3.3.6.2 Impact Evaluation

- **ENG-MM-1: Truck Idling Reductions.** CVAG will require trucks to minimize idling time to 2 minutes where available while on terminal. Truckers will be required to shut down trucks while waiting more than 2 minutes while on the terminal or CVAG will implement programs, such as appointment systems, in periods of congestion. ~~Exceptions include vehicles in a queue waiting for work at the truck rack.~~

Section 3.3.9 Hazards and Hazardous Materials

3.3.9.1.6 Federal Occupational Safety and Health Administration

The proposed project would be required to comply with federal OSHA or state equivalent regulations pertaining to dust and combustible dust, including but not limited to OSHA measures:

- 1910 Subpart D, Walking-working surfaces
  - 1910.22, Housekeeping
- 1910 Subpart E, Exit routes, emergency action plans, and fire prevention plans
  - 1910.38, Emergency action plans
- 1910 Subpart G, Occupational health and environmental control
- 1910 Subpart J, General environmental controls
- 1910 Subpart L, Fire protection
  - 1910.157, Portable fire extinguishers
  - 1910.165, Employee alarm systems
- 1910 Subpart N, Materials handling and storage
  - 1910.176, Handling materials – general

- 1910 Subpart R, Special industries
  - 1910.272, Grain handling facilities

~~3.3.9.1.6~~ 3.3.9.1.7 *Wildfire Hazards*

The project site is not within any fire hazard severity zones (CAL FIRE 2019a, 2019b). There are no wildlands within the project area, and wildland fires do not pose a risk to the project site.

3.3.9.2 Impact Evaluation

A: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less-than-Significant Impact After Mitigation. The purpose of the proposed project would be transloading of whole cottonseed, a nonhazardous material. Project-related construction work would involve surface preparation (i.e., filling holes) and construction of a small concrete apron pad, none of which require excavation and therefore would not expose workers to any hazards. Site construction and operations would require small quantities of common industrial materials, some of which may be hazardous if improperly managed. The proposed project would include a 500-gallon aboveground liquid storage vault for diesel fuel. Other common hazardous materials would be stored securely in appropriate metal drums. The City Fire Department is equipped to provide response in the unlikely event of a site accident, and response plans have been developed for the region.

Although whole cottonseed grain is generally considered not hazardous, dust generated through downstream activities may reduce its particle size and create a hazardous condition (Suwanee Valley 2016). Such dust may be susceptible to combustion if small particles generated during material management are exposed to an ignition source, or flash fire or explosion if grain dust is suspended in air, or an explosion if in a confined situation (Suwanee Valley 2016). Similarly, dust from particulates is identified as a mechanical eye irritant, and excessive inhalation is described as possibly affecting nose, throat, and lungs. The proposed project includes transloading whole cottonseed and does not include processing activities that are more likely to generate high levels of nuisance dust (e.g., cutting, grinding, machining, polishing, sanding). Nonetheless, potentially hazardous conditions associated with whole cottonseed dust would be addressed through operation management and control measures, including tarping whole cottonseed arriving to and leaving the facility, storing whole cottonseed outdoors, and watering whole cottonseed; implementation of the facility SMP; and adherence with applicable OSHA or state equivalent regulations pertaining to dust and combustible dust.

If improperly managed, there remains the risk for construction of the proposed project to result in spills, erosion, or other inputs of common industrial pollutants to downstream waterbodies. During operation of the proposed project, similar impacts could also occur. Although the risk for these

hazards is low given the relatively small scale of construction and operations and commodity materials handled (whole cottonseed), impacts could be considered potentially significant without mitigation. Mitigation measures BIO-MM-1 and BIO-MM-2 would be implemented to control spills and runoff during construction and operation. With implementation of these mitigation measures, the proposed project would have less-than-significant impacts from construction or operational use of common industrial materials.

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?

Less-than-Significant Impact After Mitigation. As described under Item A, while the proposed facility would handle nonhazardous cottonseed, small quantities of potentially hazardous common industrial materials would be required for site construction and operations. Without mitigation, the proposed project could potentially result in impacts associated with the accidental upset of hazardous common industrial materials. The potential for accidental upset of common industrial materials would be reduced through implementation of mitigation measures BIO-MM-1 and BIO-MM-2, which include construction and operational measures to control spills and runoff. In addition, the proposed project would operate in compliance with all applicable regulations, including Port requirements for the storage of hazardous materials (Port 2019b) and applicable OSHA or state equivalent regulations pertaining to dust and combustible dust. Additional material control would be provided by tarping all railcars and trucks arriving to or leaving the facility with whole cottonseed. The City Fire Department is equipped to provide response in the unlikely event of a site accident, and emergency response plans have been developed for the region. Therefore, with implementation of mitigation measures BIO-MM-1 and BIO-MM-2, the proposed project would result in a less-than-significant impact related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

C: Would the project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

No Impact. The nearest school is George Washington Elementary School, located approximately 0.8 mile to the east. No school is proposed within the 0.25-mile radius of the project site. Because of the area's zoning (Port Area), it is unlikely that a school would be constructed within this radius. Off-site transport of cottonseed by rail and truck would not pose a hazard to any schools because cottonseed is nonhazardous. Transport of whole cottonseed does not include processing activities that are likely to generate high levels of nuisance dust (e.g., cutting, grinding, machining, polishing, sanding). Nonetheless, potentially hazardous conditions associated with whole cottonseed dust would be further avoided or minimized through operational controls, including material tarping during transport and adherence with applicable OSHA or state equivalent regulations pertaining to

dust and combustible dust. Therefore, the proposed project would result in no impacts related to hazardous material emissions or handling in the vicinity of a school.

E: Would the project be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The project site is not located within an airport land use plan area, and the nearest airport or airstrip is located approximately 5 miles to the southeast. Although rail or truck transport may occur in proximity to airports, the proposed project entails transport of non-hazardous cottonseed. Transport of whole cottonseed does not include processing activities that are more likely to generate nuisance dust (e.g., cutting, grinding, machining, polishing, sanding). Nonetheless, potentially hazardous conditions associated with whole cottonseed dust would be avoided or minimized through operational controls, including material tarping during transport and adherence with applicable OSHA or state equivalent regulations pertaining to dust and combustible dust. Therefore, the proposed project would result in no impact related to aviation.

Section 3.3.18 Tribal Cultural Resources

3.3.18.1 Affected Environment

Two Native American tribes have requested consultation under the CEQA guidelines (commonly known as AB 52): the Wilton Rancheria Tribe and the Buena Vista Rancheria Band of Me-Wuk Indians. The Port notified these tribes of the proposed project by letter on March 23, 2020, and ~~will~~ provided the IS/MND to the tribes on May 15, 2020. No tribal cultural resources have been identified in the project site. The Wilton Rancheria emailed the Port with a request to allow Wilton Rancheria tribal representatives to observe and participate in all cultural resource surveys, including initial pedestrian surveys for the proposed project. The Port responded via email informing Wilton Rancheria that there is no ground disturbance (excavation or grading) planned for the proposed project, as described in the Draft IS/MND. Consultation with the Buena Vista Rancheria Band of Me-Wuk Indians will be ongoing.

4 Summary of Mitigation Measures

Table 1 presents the mitigation measures that would be incorporated as part of proposed project approval through the MMRP. This includes the revision to ENG-MM-1 described in Section 3.

Table 1
Final Mitigation Measures

Mitigation Measure
BIO-MM-1: Standard construction best management practices—including but not limited to use of storm drain inlet filters, erosion control (e.g., straw wattles), and maintenance of spill control kits—will be implemented during construction to control or respond to spills or other potential sources of construction-related pollution.
BIO-MM-2: Operation of the proposed facility will include implementation of the facility SMP, which includes plans for spill prevention, control, and management. As a component of the SMP, CVAG will provide annual California Environmental Reporting System (CERS) submittals detailing quantities and management of potentially hazardous materials at the proposed facility.
ENG-MM-1: Truck Idling Reductions. CVAG will require trucks to minimize idling time to 2 minutes where available while on terminal. Truckers will be required to shut down trucks while waiting more than 2 minutes while on the terminal or CVAG will implement programs, such as appointment systems in periods of congestion.
ENG-MM-2: Use of Clean Trucks. Where possible, CVAG will encourage the use of clean trucks (defined as model year 2017 or newer) to transport fuel. CVAG will educate customers about the SJVAPCD Truck Replacement Program during contract discussions.
ENG-MM-3: Energy/Waste Audit. CVAG will develop a plan for reducing overall energy use at its terminal. The plan will incorporate the following measures at a minimum: Replace less-efficient bulbs with energy-efficient light bulbs, where applicable. Identify areas for waste reduction, including reductions in single use products in terminal buildings.

5 References

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CAPCOA (California Air Pollution Control Officers Association), 2016. *CAPCOA Air Toxic "Hot Spots" Program, Facility Prioritization Guidelines*. August 2016. Available at: http://www.capcoa.org/wp-content/uploads/2016/08/CAPCOA%20Prioritization%20Guidelines%20-%20August%202016%20FINAL.pdf.

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Appendix A
Comment Letters and Email

June 16, 2020

Jason Cashman
Environmental and Regulatory Affairs Manager
Port of Stockton
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Submitted via email: jcashman@stocktonport.com

Dear Jason Cashman:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility (Project) Initial Study and Mitigated Negative Declaration (IS/MND), State Clearinghouse No. 2020050308. The Project proposes the construction of a new transload facility that would be used to transfer approximately 96,000 tons per year of cottonseed from inbound rail cars to outbound heavy-duty trucks. Once in operation, the Project would add 8 rail trips per month along the existing BNSF rail line and 320 heavy-duty truck trips per month along local roadways. The Project is located within the Port of Stockton (Port), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Industrial uses, such as transloading facilities, can result in high daily volumes of heavy-duty diesel truck and rail traffic and operation of on-site equipment (e.g., forklifts, yard tractors, etc.), which emit toxic diesel emissions and contribute to regional air pollution and global climate change.[1] CARB has reviewed the IS/MND and is concerned with the potential cumulative health impacts associated with the Project in conjunction with other industrial projects planned or already in operation at the Port.

I. The Project Would Increase Exposure to Air Pollution in Disadvantaged Communities

The Project, if approved, will expose nearby disadvantaged communities to elevated air pollution. Addressing the disproportionate impacts that air pollution has on disadvantaged communities is a pressing concern across the state, as evidenced by statutory requirements compelling California's public agencies to target these communities for clean air investment, pollution mitigation, and environmental regulation.

[1] With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

The following 3 pieces of legislation need to be considered and included in the IS/MND when developing a project like this near a Stockton community.

Senate Bill 535 (De León, 2012)

Senate Bill 535 (De León, Chapter 830, 2012)[2] recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality and requires funds to be spent to benefit disadvantaged communities. The California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen).[3] According to CalEnviroScreen, Stockton communities near the Project score within the top 1 percent of California census tracts; therefore, CARB urges the Port to ensure that the Project does not adversely impact neighboring disadvantaged communities.

Senate Bill 1000 (Leyva, 2016)

Senate Bill 1000 (SB 1000) (Leyva, Chapter 587, Statutes of 2016)[4] amended planning and zoning laws. SB 1000 requires local governments that have identified disadvantaged communities to incorporate the addition of an environmental justice element into their general plans, upon the adoption or next revision of 2 or more elements concurrently on or after January 1, 2018. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities, such as the Stockton communities that surround the Project site. Since the City of Stockton (City) has not yet adopted an environmental justice element, it is imperative that the Port consult with the City to determine how it can best integrate air quality elements into its Project that reduce local disadvantaged communities' exposure to the Project's pollutants. This will ensure that the Port is acting in a manner consistent with the City's efforts in developing policies for its environmental justice element.

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2. Senate Bill 535, De León, K., Chapter 800, Statutes of 2012, modified the California Health and Safety Code, adding § 39711, § 39713, § 39715, § 39721and § 39723.
3. "CalEnviroScreen 3.0." Oehha.ca.gov, California Office of Environmental Health Hazard Assessment, June 2018, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30.
4. Senate Bill 1000, Leyva, S., Chapter 587, Statutes of 2016, amended the California Health and Safety Code, § 65302.

Assembly Bill 617 (Garcia, 2017)

The State of California has emphasized protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017).[5] AB 617 requires new community-focused and community-driven actions to reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants. In response to AB 617, CARB established the Community Air Protection Program with the goal of reducing exposure in communities heavily impacted by air pollution. This Project falls within the boundaries of the Stockton community, which is 1 of 3 statewide communities chosen for inclusion in the second year of the Community Air Protection Program.

Stockton was selected for both community air monitoring and the development of an emissions reduction program due to its high cumulative exposure burden, the presence of a significant number of sensitive populations (children, elderly, and individuals with pre-existing health conditions), and the socioeconomic challenges experienced by its residents. The average overall CalEnviroScreen score for the Stockton community is in the top 1 percent, indicating that the area is home to some of the most vulnerable neighborhoods in the state. The air pollution levels in Stockton routinely exceed state and federal air quality standards. Additionally, the community was prioritized by the San Joaquin Valley's AB 617 Environmental Justice Steering Committee.[6]

Health-harming emissions, including particulate matter (PM), toxic air contaminants, and diesel emissions generated during the construction and operation of the Project may negatively impact the community, which is already disproportionately impacted by air pollution from existing freight facilities and other stationary sources of air pollution. Part of the AB 617 process requires CARB and the San Joaquin Valley Air Pollution Control District (SJVAPCD) to create a highly-resolved inventory of air pollution sources within this community. CARB will be more than happy to share this community emissions inventory with the Port to aid in the CEQA process.

II. The IS/MND Does Not Adequately Analyze the Project's Potential Health Risk Impacts

The IS/MND did not conduct a health risk assessment (HRA) or any other quantitative or qualitative analysis, to evaluate the Project's potential impact on public health. Instead, the IS/MND concluded that the Project would not expose nearby sensitive populations to substantial pollutant concentrations that would result in a significant impact since the Project is located beyond 1,000 feet from the nearest residence and

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5. Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.
6. California Air Resources Board (2018). 2018 Community Recommendations Staff Report. Sacramento, California: Community Air Protection Program. https://ww2.arb.ca.gov/resources/documents/2018-community-recommendations-staff-report.

has a low diesel particulate matter (diesel PM) emission rate. Although the Project's air pollutant emission rates are below SJVAPCD's significance thresholds, the IS/MND must, at a minimum, include a quantitative analysis that demonstrates the extent of the Project's impact on public health.[7]

Since the Project is located near residences already disproportionately burdened by multiple sources of air pollution, CARB recommends that the Port should prepare an HRA for the Project. The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments).[8]

III. The IS/MND Should Consider the Project's Cumulatively Considerable Air Quality and Associated Public Health Effects

The IS/MND concluded that the Project's air pollutant emissions and cancer risks would not contribute to a significant cumulative impact. This conclusion was reached by comparing the Project's criteria pollutant emissions to SJVAPCD's significant thresholds. Although the Port did evaluate the Project's air quality impacts, it did not consider the Project's cumulative effects in conjunction with other industrial projects planned or already in operation at the Port.

CEQA requires lead agencies to consider whether the incremental effects of a proposed project are cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. (See Title 14, Cal. Code of Regs., § 15064, subd. (h)(1).) There are numerous existing and planned projects within the Port that will be in operation at the same time as the Project. These cumulative projects include the Eco-Energy Liquid Bulk Receiving Terminal Development Project, NuStar Ethanol Infrastructure Upgrades Project, and NuStar Domestic Renewable Diesel Project. Considering the number of projects being constructed or already in operation at the Port, CARB is concerned that the Project could have a cumulatively considerable impact on air quality and public health. To lessen the Project's contribution to the Port's cumulative diesel PM and nitrogen oxide (NO_x) emissions, CARB urges the Port and applicant to implement the following air pollutant emission reduction measures.

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7. In fact, the California Supreme Court recently addressed this issue in its landmark ruling in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (*Friant Ranch*). In *Friant Ranch*, the Court held that an EIR is inadequate if it does not make "a reasonable effort to discuss relevant specifics regarding the connection between two segments of information already contained in the EIR, the general health effects associated with a particular pollutant and the estimated amount of that pollutant the project will likely produce." (Id., at p. 521.)

8. Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February, 2015. Accessed at: https://oehha.ca.gov/media/downloads/crnr/201 Sguidancemanual.pdf.

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near zero-emissions equipment and tools.

2. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits such that the emission reductions achieved equal or exceed that of a Tier 4 engine.

3. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.

4. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NO_x standard starting in 2022.[9]

5. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.

6. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

[9] In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model year 2010 and later. CARB's optional low-NO_x emission standard is available at: https://www.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm.

7. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks, including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[10] Periodic Smoke Inspection Program (PSIP),[11] and the Statewide Truck and Bus Regulation.[12]

8. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than 5 minutes while on site.

IV. Conclusion

There are many existing and planned industrial projects at the Port that will be in operation at the same time as the Project. CARB is concerned that the Project, in conjunction with other projects at the Port, could expose nearby Stockton communities to diesel PM and NO_x emissions that could have a significant effect on public health. To reduce the Project's contribution to diesel PM and NO_x emissions emitted within the Port, the final design of the Project should include all existing and emerging zero-emission technologies. CARB encourages the Port and applicant to implement the measures listed under Section III of this comment letter and to carefully consider the Project's cumulative impact on air quality and public health.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

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[10] In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: https://www.arb.ca.gov/cc/hdghg/hdghg.htm.

[11] The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: https://www.arb.ca.gov/enf/hdvip/hdvip.htm.

[12] The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

CARB appreciates the opportunity to comment on the IS/MND for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, at (916) 440-8242 or via email at stanley.armstrong@arb.ca.gov.

Sincerely,

Richard Boyd

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cc: See next page.

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15 June 2020

Jason Cashman
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COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, CENTRAL VALLEY AG GROUP BULK WHOLE COTTONSEED TRANSLOAD FACILITY AT THE PORT OF STOCKTON PROJECT, SCH#2020050308, SAN JOAQUIN COUNTY

Pursuant to the State Clearinghouse's 15 May 2020 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton Project, located in San Joaquin County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State

Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

If you have questions regarding these comments, please contact me at (916) 464-4856 or Nicholas.White@waterboards.ca.gov.

Nicholas White
Water Resource Control Engineer

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

June 17, 2020

Jason Cashman
Port of Stockton
Environmental and Regulatory Affairs Department
2201 West Washington Street
Stockton, CA, 95203

Project: Initial Study/Mitigated Negative Declaration for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton

District CEQA Reference No: 20200470

Dear Mr. Cashman:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Initial Study/Mitigated Negative Declaration from the Port of Stockton (Port) for the Central Valley Ag Group Whole Cottonseed Transload Facility. The proposed project consists of establishing a new transloading facility at the Port to receive whole cottonseed by rail and transport the material out by truck, the facility would also construct a small concrete pad, modular office, truck scale, portable toilet, diesel fuel tank, fuel storage compartment, generator, and a designated area to be used as a parking lot (Project). The Project is located at 530 Port Road 23, in Stockton, CA. The District offers the following comments:

1. Project Related Emissions

Based on the information provided to the District, Project specific annual emissions of criteria pollutants are not expected to exceed any of the following District significance thresholds: 100 tons per year of carbon monoxide (CO), 10 tons per year of oxides of nitrogen (NOx), 10 tons per year of reactive organic gases (ROG), 27 tons per year of oxides of sulfur (SOx), 15 tons per year of particulate matter of 10 microns or less in size (PM10), or 15 tons per year of particulate matter of 2.5 microns or less in size (PM2.5). Therefore, the District concludes that the Project would have a less than significant impact on air quality when compared to the above-listed annual criteria pollutant emissions significance thresholds.

Although the project emissions would have a less than significant impacts on construction, the District recommends utilizing the cleanest reasonably available off-road construction fleets and practices (i.e. eliminating unnecessary idling) to further reduce impacts from construction-related exhaust emissions and activities.

Samir Sheikh
Executive Director/Air Pollution Control Officer

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2. Health Risk Assessment

The MND did not include a health risk assessment (HRA). A Health Risk Screening/Assessment identifies potential Toxic Air Contaminants (TAC's) impact on surrounding sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences. TAC's are air pollutants identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) (https://www.arb.ca.gov/toxics/healthval/healthval.htm) that pose a present or potential hazard to human health. A common source of TACs can be attributed to diesel exhaust emitted from both mobile and stationary sources.

The District recommends the Project be evaluated for potential health impacts to surrounding receptors (on-site and off-site) resulting from operational and multi-year construction TAC emissions.

i) The District recommends conducting a screening analysis that includes all sources of emissions. A screening analysis is used to identify projects which may have a significant health impact. A prioritization, using CAPCOA's updated methodology, is the recommended screening method. A prioritization score of 10 or greater is considered to be significant and a refined Health Risk Assessment (HRA) should be performed.

   For your convenience, the District's prioritization calculator can be found at: http:www.valleyair.org/busind/pto/emission_factors/Criteria/Toxics/Utilities/PRIORITIZATION%20RMR%202016.XLS.

ii) The District recommends a refined HRA for projects that result in a prioritization score of 10 or greater. Prior to performing an HRA, it is recommended that the Project proponent contact the District to review the proposed modeling protocol. The Project would be considered to have a significant health risk if the HRA demonstrates that the Project related health impacts would exceed the Districts significance threshold of 20 in a million for carcinogenic risk and 1.0 for the Acute and Chronic Hazard Indices, and would trigger all feasible mitigation measures. The District recommends that Projects that result in a significant health risk not be approved.

For HRA submittals, please provide the following information electronically to the District for review:

- HRA AERMOD model files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodology.

More information on toxic emission factors, prioritizations and HRAs can be obtained by:

- E-Mailing inquiries to: hramodeler@valleyair.org; or
- The District can be contacted at (559) 230-6000 for assistance; or
- Visiting the Districts website (Modeling Guidance) at: http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm.

3. Heavy Duty Mobile Sources

Heavy Duty Truck Replacement with Zero and Near Zero Emission Technology

The District is currently designated as extreme non-attainment of the federal national ambient air quality standard for ozone and non-attainment for PM2.5. Mobile source emissions resulting from growth and development could have significant impacts on air quality. The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from Heavy Heavy Duty (HHD) Trucks, the single largest source of NOx emissions in the San Joaquin Valley. The District recently adopted the *2018 PM2.5 Plan* for meeting federal PM2.5 standards in the San Joaquin Valley, and which relies on significant new emissions reductions from HHD Trucks. These reductions include those achieved through the implementation of the California Air Resources Board (CARB) Statewide Truck and Bus Regulation, which requires truck fleets operating in California to meet the 2010 0.2 g/bhp-hr NOx standard by 2023. Additionally, to meet the federal air quality standards by the 2020 to 2024 attainment deadlines, the Plan relies on a significant and immediate transition of heavy duty truck fleets to zero or near-zero emissions technologies, including the near-zero truck standard of 0.02 g/bhp-hr NOx established by the California Air Resources Board.

Although, per the MND the Project emissions would have a less than significant impacts on operational emissions, the District recommends the Lead Agency consider the following emission reduction measures:

- Advising operational fleets to utilize the cleanest available HHD truck technologies, including zero and near-zero (0.02 g/bhp-hr NOx) technologies as feasible,

- Advising all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) from development projects (such as distribution centers, warehouse, etc.) to utilize zero-emissions technologies as feasible, and

- Advising operational fleets and on-site service equipment to implement best practices (i.e. eliminating unnecessary idling).

In addition, to support the use of clean HHD truck fleet, the District offers incentives for the replacement of an in use diesel truck with cleaner technology, including battery electric, hybrid and near zero emission trucks. The goal of this strategy is to reduce emissions from heavy duty diesel trucks operating in the Port of Stockton. By reducing or eliminating emissions from heavy duty trucks, significant PM2.5, diesel particulate matter, and NOx emissions reductions can be achieved.

Reduce Idling of Heavy Duty Trucks

The goal of this strategy is to limit the potential for localized PM2.5 and toxic air quality impacts associated with failure to comply with the state's heavy duty anti-idling regulation (e.g limiting vehicle idling to specific time limits). The diesel exhaust from excessive idling has the potential to impose significant adverse health and environmental impacts. Therefore, efforts to ensure compliance of the anti-idling regulation, especially near sensitive receptors, is important to limit the amount of idling within the community, which will result in community air quality benefits.

Heavy Duty Truck Rerouting

Truck routing involves the path/roads HHD trucks take to and from their destination. The Project's air emissions from HHD trucks have the potential to impact sensitive receptors.

The District recommends the Lead Agency evaluate HHD truck routing patterns to help limit emission exposure to sensitive receptors. More specifically, this measure would assess anticipated truck routes, in consideration of the number and type of each vehicle, destination/origin of each vehicular trip, time of day/week analysis, vehicle miles traveled and emissions.

4. Locomotives, and Railcar Movers/Switchers Sources

Replacing older locomotives is important to reduce the public's exposure to diesel emissions, including PM2.5 in the form of diesel particulate and NOx. These pollutants negatively impact human health, especially for sensitive populations such as children and the elderly. New, clean-technology locomotives generate significantly lower emissions than older, uncontrolled diesel locomotives.

The District offers two incentive programs for locomotive fleets interested in transitioning to newer, clean technology, including:

- Heavy-Duty Program – http://valleyair.org/grants/locomotive.htm
  Locomotive replacements, including switcher locomotives and railcar movers can be funded as an eligible project category under the District's utilizing funding provided to support AB 617. These projects are administered according to the Carl Moyer Program guidelines.

- Proposition 1B - http://valleyair.org/grants/locomotives-prop1b.htm
  This program incentivizes the reduction of emissions and health risks associated with freight movement along California's trade corridors via upgrading to cleaner technologies or installation of emissions capture and control systems.

5. Vegetative Barriers and Urban Greening Sources

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the update of gaseous pollutants. Examples of vegetative barriers include, but not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought resistant low maintenance greenery.

6. Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation, which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 requires that new and modified stationary sources of emissions mitigate their emissions using best available control technology (BACT).

This Project will be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and will require District permits. District records indicate, the District has received two (2) ATC applications from Central Valley Ag Group for a Whole Cotton Seed (WCS) receiving operation and outdoor storage operation and for a stacking operation that will utilize a self-propelled track-mounted McCloskey Model TR 36×100 DK stacker powered by a permit exempt 84.5 bhp Kubota Model V3600-T-ET02 Tier 3 certified diesel-fired IC engine. For further information or assistance, the project proponent may contact the District's Small Business Assistance (SBA) Office at (209) 557-6446.

7. Other District Rules and Regulations

The proposed Project may be subject to District rules and regulations, including: Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), and Rule 4641

(Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the Project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this Project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (209) 557-6446.

Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm.

The District recommends that a copy of the District's comments be provided to the Project proponent. If you have any questions or require further information, please contact Eric McLaughlin by e-mail at Eric.McLaughlin@valleyair.org or by phone at (559) 230-5808.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM: em

SIERRA CLUB
DELTA-SIERRA GROUP
MOTHER LODE CHAPTER

CCAC
CENTRAL CALIFORNIA ASTHMA COLLABORATIVE

Jason Cashman
Port of Stockton Environmental and Regulatory Affairs Manager
2201 West Washington Street
Stockton, California 95203
Via email to jcashman@stocktonport.com

June 14, 2020

Re: May 2020 Central Valley Ag Group (CVAG) Bulk Whole Cottonseed Transload Facility Initial Study/Mitigated Negative Declaration for the CVAG Bulk Whole Cottonseed Transload Facility at the Port of Stockton

The Delta-Sierra Group (DSG) has completed review of the Initial Study/Mitigated Negative Declaration (IS/MND) to address the environmental effects of developing the Central Valley Ag Group rail-to-truck transload facility for whole cottonseed at property owned by the Port of Stockton, shown in the photo below. The IS/MND is deficient in a number of areas such as the characterization of whole cottonseed, air quality, greenhouse gas emissions-energy, and stormwater which the California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) be prepared instead of a mitigated negative declaration. Delta-Sierra Group's review indicate that additional environmental analyses and mitigations are necessary to comply with local, regional, and state regulatory guidance related to the facility's operational activities.

Public outreach and notification of comment periods involving environmental projects continues to require improvement. The DSG became aware of this project via email from a representative of the Port of Stockton on May 15, 2020 and the IS/MND was posted on the Port of Stockton CEQA webpage[1]; however, the document and webpage did not include the comment period which can be found on the CEQAnet website.[2] The Port of Stockton as the lead public agency has the principal responsibility for approving the project and has stated that the project could have a significant effect on the environment. Outreach to the nearby affected residents and school facilities was not performed and is necessary for disclosure to nearby sensitive receptors such as Boggs Tract neighborhood residents 2,800 feet to the east, George Washington Elementary School located approximately 0.8 mile to the east, with the nearest park Boggs Tract Park located 3,200 feet east of the project site.

[1] https://www.portofstockton.com/wp-content/uploads/2020/05/CVAG_Whole_Cottonseed_ISMND_05122020.pdf
[2] https://ceqanet.opr.ca.gov/2020050308/2

The Boggs Tract Community Center Advisory Board located in the neighborhood can be notified by contacting via email to the following individuals Rick Aguilera at raguilera@sjgov.org, Erté Boyette at eboyette@sjgov.org, and Frank Rodriguez at frodriguez@sjgov.org. The DSG would welcome dialogue regarding increased public outreach and involvement.

The proposed project was constructed and became operational in spring 2019 and according to the IS/MND without a Port lease or any CEQA analyses, and without stormwater discharge approval issued by the Port to tenants under the Port's NPDES Permit. This IS/MND was prepared to evaluate the impacts of the operational project as compared to the baseline condition when the project site was only a concrete pad and not operational. CEQA compliance is required for the Central Valley Ag Group (CVAG) to obtain a lease from the Port and a San Joaquin Valley Air Pollution Control District permit for the proposed outdoor stockpile. The Central Valley Ag Group headquartered at 5509 Langworth Road Oakdale, California 95361 lists their facility at the Port of Stockton at 26 Hooper Drive Stockton, CA 95203.[3] CVAG is seeking a permit and lease to transport approximately 96,000 tons per year of whole cottonseed to the Port by rail, and transload the cottonseed to trucks for use throughout the region as a livestock feed supplement.

As part of the project, CVAG constructed a small concrete apron pad on an existing Port 2.5-acre concrete pad lot at 530 Port Road 23; filled and leveled holes; installed a portable modular-type office, truck scale, portable toilet, diesel fuel tank, fuel storage compartment, and auxiliary generator at the project site; and designate part of the project site as a parking lot. The City's Envision Stockton 2040 General Plan designates the project site for industrial use, and the zoning classification of the project site and surrounding parcels is Port Area (PT), Industrial General (IG), or Unzoned (UNZ). Electricity would be provided by PG&E through an existing power pole at the southwest corner of the project site. The project would have no connection to Port water supplies. The project would use small quantities of potable water for drinking and wash water and non-potable water for dust control, all of which would be delivered to the project site by CVAG. The project discharges stormwater runoff through Port of Stockton infrastructure. Fire services are to be supplied by the City of Stockton Fire Department.

The photo below shows the existing operation of the facility.[4]

How has this facility operated for a year on property under the Port of Stockton's jurisdiction, without an SJVAPCD permit or Port of Stockton lease and stormwater management approval?

[3] http://www1.cv-ag.com/locations-and-hours-of-operation/

[4] https://earth.google.com/web/search/port+of+stockton/@37.94042428,-121.32790097,-

Whole Cottonseed Characterization

The above photo shows two distinct types of material: a white and a brown material. No description is provided to identify the white and brown materials. The IS/MND should include full characterization of the existing operations. This lack of disclosure is further evidence that additional environmental analyses are warranted.

What is the composition of the white and brown materials stockpiled on site?

The IS/MND stated that whole cottonseed is a nonhazardous material. A safety data sheet (SDS) was located and states that whole cottonseed is classified as a combustible dust if small particles are generated during further processing, handling or by other means.[5] Additionally, whole cottonseed is a mechanical eye irritant and may cause breathing difficulties if inhaled. The emergency overview and explosion hazards state that combustible dust concentration in air may form and that while initially not hazardous that dusts that may create a hazardous condition from actions including shipping, handling, transfer to bins, etc. Cottonseed dust is flammable when exposed to an ignition source. Airborne dust in sufficient concentrations when exposed to an ignition source may flash or in a confined situation may fuel an explosion.

The picture from google earth shown above includes train car and dust tracking.

Are these train cars tarped to prevent cottonseed deposits along the train route? Are the trucks used to transport the cottonseed open or closed to prevent cottonseed deposits on roadways? Has the City of Stockton Fire Department, as the designated fire service provider, been notified of the potential hazardous associated with cottonseed handling and transport?

The IS/MND described how CVAG has been transporting 96,000 tons of cottonseed annually. CVAG has reportedly been using this facility to distribute cottonseed since spring 2019. The follow description of material handling by rail and out of the Port by truck was included in the IS/MND:

1. Gondola-type railcars would arrive at the project site via manifest rail. Railcars would be moved within the Port by the Central California Traction Company, the Port's short-line operator.
2. Railcars arriving at the project site would be offloaded by opening one end of the gondola compartment, placing down a ramp and door holder, and then driving a small front-end loader in and out of the cars. The loader would deposit the cottonseed in the lot.
3. A second, larger front-end loader would stack the offloaded cottonseed in truck-loading piles (approximately 18 feet high) in the yard. The completed piles would be uncovered during the dry season and covered with tarps during the wet season.

[5] https://www.svfeeds.com/SDS/SVF-SDS-078.htm

4. Outbound empty trucks (approximately 16 trucks per day, 20 days per month) would arrive at the project site and would be loaded from the truck-loading piles by a front-end loader.
5. Limited use of a skid steer would occur to move whole cottonseed within tight spaces in the project site.
6. Limited use of a self-propelled stacker (less than 500 hours annually) would occur to stack whole cottonseed to an approximate height of 25 feet if additional ground space is required.

Additional mitigation is needed to protect worker safety and public safety within 1 mile of the facility. The safety sphere must be increased due to the throughput proposed for the facility, as shown below:

Table 2
Proposed Project Throughput

	Vehicles per Month	Cottonseed per Vehicle	Total Cottonseed Transloaded per Month
Railcars (Inbound)	80 railcars per month, 8 rail trips per month[1]	100 tons per railcar	8,000 tons (96,000 tons per year)
Trucks (Outbound)	320 trucks per month	25 tons per truck	

Note:
1. Assumes one manifest train would accommodate 10 railcars.

The proposed project would operate 5 to 6 days per week, 10 hours per day (7:00 a.m. to 5:00 p.m.). No more than two employees would be on site during typical operating conditions. A maximum operational day would result in 10 rail cars (1 train) and 40 trucks and could occur up to 1 day per month. Forty trucks in one day as a max is a statement that should have been supported by actual operational data. If in fact 40 trucks were transporting in one day, it seems likely that 320 trucks per month is an underestimation. As part of the Safety Management Plan (SMP), CVAG provides annual California Environmental Reporting System submittals detailing quantities and management of potentially hazardous materials at its facilities. No monitoring of particulate matter or efforts to reduce wind transport was provided in the IS/MND or dust control mitigation other than bringing some water onsite for dust suppression. The frequency of application was not disclosed. DSG does not support the claim made in the IS/MND that the proposed project would result in no impacts related to hazardous material emissions or handling in the vicinity of a school. Evidence has been provided that whole cottonseeds can become hazardous. Therefore, the statement that off-site transport of cottonseed by rail and truck would not pose a hazard to any schools because cottonseed is nonhazardous is not true.

Why is not dust suppression monitoring included and disclosed to the residents of the Boggs Tract neighbor and Stockton made available, along with the safety management plan provided as part of the IS/MND?

Air Quality

The IS/MND described the prevailing winds in Stockton as: "winds are predominately up-valley (from the north) in all seasons, but more so in the summary and spring months." This may be true of the southern part of the San Joaquin Valley but not so for Stockton CA, where prevailing winds are more westerly (from the west to the east). The direction of the wind becomes important when assessing the population exposure.

Data that conflicts with the description of prevailing winds has been obtained from two sources: Western Regional Climate Center[6] and the California Air Resources Board (CARB) air quality monitoring station located at Public Health Services on Hazelton Avenue in Stockton CA. The data from Western Regional Climate Center includes prevailing wind direction based on the hourly data from 1992-2002 obtained from the Stockton Municipal Airport (KSCK) and is defined as the direction with the highest percent of frequency.

[6] https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_dir_avg

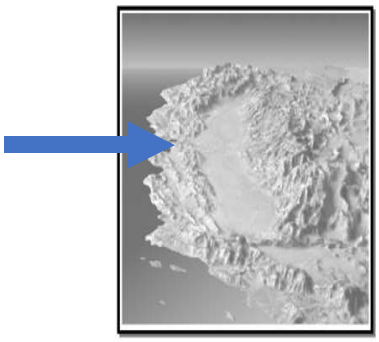
Western Reginal Climate Center Data 1992-2002

STATION	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
STK Airport	SE	SE	W	W	W	W	W	W	W	W	W	SE	W

The San Joaquin Valley Air Pollution Control District accessed the CARB wind direction data for the Hazelton Station hourly wind speed and direction data from the Stockton-Hazelton air monitoring site during the period of 2017-2019. These tabulated data shown below describe how approximately 62% of the time the wind direction has significant west or northwesterly component. The marine wind direction into the Central Valley is shown with an arrow through the delta to the Central Valley on the topographic map below.

Hazelton Station 2017-2019

Direction	Percent of Time for 3-year period
WNW	16.89%
WSW	12.47%
NW	12.28%
W	12.02%
NNW	7.93%
Summary	**61.58%**



The California Environmental Quality Act requires environmental impacts of a proposed project be identified, assessed, and avoided or mitigated as feasible, if these impacts are significant. This document, *Guidance for Assessing and Mitigating Air Quality Impacts*, provides technical guidance for the review of air quality impacts from proposed projects within the boundaries of the San Joaquin Valley Unified Air Pollution Control District.[7] The Port of Stockton is within the SJVAPCD and the most current related attainment status is shown below.[8]

San Joaquin Valley Attainment Status

Pollutant	Federal Standards	State Standards
Ozone- One hour	No Federal Standard	Nonattainment/Severe
Ozone – Eight hour	Nonattainment/Extreme	Nonattainment
Particulate Matter 10 *u*g (PM_{10})	Attainment	Nonattainment
Particulate Matter 2.5 *u*g ($PM_{2.5}$)	Nonattainment	Nonattainment

Ozone, the major component of the Central Valley's summertime smog, is formed via chemical reactions between reactive organic gases and nitrogen oxides (NO_X) in the presence of ultraviolet radiation or sunlight. Sunshine and warm temperatures are ideal conditions for the formation of photochemical oxidants, leading to ozone formation. Exposure to ozone may cause headaches, coughing, dry throat, shortness of breath, a heavy feeling in chest, and fluid in the lungs. Higher levels of exposure can lead to more severe symptoms. Chronic exposure may lead to asthma.[9] Tiny particles of solids or liquids (excluding pure water) that are suspended in the atmosphere are known as particulate matter (PM) and are classified according to their diameter in microns as either $PM_{2.5}$ (less than or equal to 2.5 microns in diameter) or PM_{10} (less than or equal to 10 microns in diameter).

[7] https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF not the following link that was included in the IS/MND: http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf.

[8] http://www.valleyair.org/aqinfo/attainment.htm

[9] https://www.cdc.gov/niosh/topics/ozone/default.html

The IS/MND included summaries of emissions. The baseline conditions include a vacant project site without operational conditions and without emissions. The proposed project would generate air emissions from construction and operations. Construction would be conducted over a 2-week period (completed and in operation since spring 2019) and would not include the use of heavy equipment. The proposed project operational emissions, shown in Tables 4 and 5, are a result of rail and truck emissions: 80 railcars delivered per month, or eight trains, and 320 truck calls per month. Annually, there would be 96 train trips and 3,840 truck trips.

Table 4
Annual Operational Emissions in San Joaquin Valley Air Pollution Control District – Project (Tons per Year)

Source Category	PM_{10}	$PM_{2.5}$	NO_X	SO_X	CO	VOC
Year 2020						
Trucks	0.23	0.07	4.58	0.01	0.68	0.19
Rail	0.02	0.02	0.87	0.00	0.26	0.04
Employee Vehicles	0.00	0.00	0.00	0.00	0.02	0.00
Material Handling Dust	0.12	0.12				
Mobile on Site	0.01	0.01	0.33	0.00	0.35	0.03
Year 2020 Total	0.38	0.22	5.79	0.02	1.31	0.26
CEQA Impacts						
Significance Threshold	15	15	10	27	100	10
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
Emissions might not add precisely due to rounding.
PM_{10} and $PM_{2.5}$ truck emissions include exhaust and road dust.
Rail emissions reflect switcher and line-haul locomotives.
Material handling dust reflects dust emissions from product handling at the terminal.

The above emission summary does not include truck travel on the roads of San Joaquin County leading to ultimate destinations; thereby, underestimating the air quality impacts associated with operations creating the impression that mitigations are not necessary.

Why are operational emissions limited to project site idling and do not account for distribution transport to and from the site?

Table 5
Average Daily Operational Emissions On Site – Project (Pounds per Day)

Source Category	PM_{10}	$PM_{2.5}$	NO_X	SO_X	CO	VOC
Year 2020						
Trucks on Site	0.15	0.0	0.4	0.0	0.1	0.0
Rail on Site	0.05	0.0	1.4	0.0	0.4	0.1
Material Handling Dust	0.7	0.7				
Mobile on Site	0.1	0.0	1.8	0.0	1.9	0.2
Year 2020 Total	0.9	0.8	3.6	0.0	2.4	0.3
CEQA Impacts						
Significance Threshold	100	100	100	100	100	100
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
Emissions might not add precisely due to rounding.
Truck emissions include truck transit on site and truck idling on site.
Rail emissions reflect 1 switching event on site.
PM_{10} and $PM_{2.5}$ truck emissions include on-site exhaust and road dust.
Material handling dust reflects dust emissions from product handling at the terminal.

The IS/MND stated that "While not required by SJVAPCD, because the operation may result in days in which operations are higher than the average day, Table 6 presents emissions associated with a maximum day. Operational assumptions for a maximum day would include 10 rail cars (1 train a day) and 40 trucks per day and could occur up to 1 day per month." These data only include on-site exhaust and road dust. The IS/MND stated: "Because the proposed project would not exceed thresholds, it would not conflict with or obstruct implementation of SJVAPCD's O_3 attainment plans, including its most recent 2016 plan for the 2008 8-hour O_3 standard (SJVAPCD 2016). Impacts would be considered less than significant."

Table 6
Maximum Day Operational Emission in San Joaquin Valley Air Pollution Control District

Source Category	PM_{10}	$PM_{2.5}$	NO_X	SO_X	CO	VOC
Year 2020						
Trucks	4.7	1.5	95.5	0.3	14.2	4.0
Rail	0.2	0.2	10.1	0.0	3.1	0.4
Employee Vehicles	0.0	0.0	0.0	0.0	0.1	0.0
Material Handling Dust	2.5	2.5				
Mobile On Site	0.1	0.0	1.8	0.0	1.9	0.2
Maximum Day Total	7.5	4.2	107.4	0.3	19.4	4.5

Notes:
Emissions may not add precisely due to rounding.
PM_{10} and $PM_{2.5}$ truck emissions include exhaust and road dust.
Rail emissions reflect switcher and line-haul locomotives.
Material handling dust reflects dust emissions from product handling at the terminal.

The maximum daily NOx exceeds the CEQA significance threshold of 100 lbs/day and is the primary pollutant associated with ozone levels which are problematic both at 1 hour and 8 hour averages. These values do not include truck and rail travel to and from the site. Additional mitigation is necessary.

The IS/MND stated that there will be a less than significant impact related to cumulative impacts without doing any cumulative impact analyses. The reason that there will not be a cumulative impact according to the IS/MND is "criteria pollutant emissions would be less than significant and therefore would not contribute to significant cumulative impacts." The DSG disagrees for two reason: 1) there are a number of new projects which are under development at the Port of Stockton with significant transportation related air quality impact; and 2) the IS/MND only considered onsite air quality impacts instead of considering the full impact associated with operations or cumulative impacts.

The IS/MND stated that there will be a less than significant impact associated with exposure of sensitive receptors to substantial pollutant concentration. Sensitive receptors according to SJVAPCD includes residence, hospital, school, or convalescence facility where sensitive individuals could be exposed to substantial pollutant concentrations. The nearest "sensitive receptor" is the Boggs Tract residential community located 2,800 feet to the east of the facility. Diesel particulate matter emitted by on- and off-road vehicles is considered the toxic air contaminants of most concern from motor vehicles. Diesel is also associated with objectable and characteristics odors. The reason toxic air contaminant emissions were not quantified was that sensitive receptors were more than 1000 feet away from the site (not necessarily the emissions from trucks and rail travelling to and from the site). Additionally, the IS/MNG stated that "Operational emissions would occur over the entire operational period of the proposed project; however, PM emissions would increase by less than 1 pound per day over existing conditions. Due to the low level of emissions and distance between sources and emissions, the proposed project would not expose sensitive

receptors to substantial pollutant concentrations. This is considered a less-than-significant impact." The DSG disagrees with this assessment. Maximum PM emissions exceed 1 pound per day as shown in Table 6. The planting of a tree barrier south and east of the facility would decrease exposure to pollutants. There is a narrow strip of disturbed ruderal vegetation immediately south of the project site that could possibly be used for tree planting and some other structure could be installed to the east of the project site.

Why has not the Port of Stockton performed a cumulative air quality assessment for the nearby Boggs Tract neighborhood?

The IS/MND stated that there would be a less-than-significant impact to traffic from operations. This statement was based on the fact that the City of Stockton while having a policy to amend the City's Transportation Impact Analysis Guideline in *Envision 2040*, the policy has not been amended. The Port of Stockton used the City's existing transportation policies for significance: 100 trip during peak hours threshold. The IS/MND stated that the project would generate approximately 11 new truck trips to and from the project. The current City of Stockton Transportation Impact Analysis Guideline states that a transportation analysis may be required even if the threshold is not met if the project may impact an already congested or high-accident locations.[10] The Port of Stockton should perform a cumulative analysis of traffic impacts which involves outreach to the residents of Stockton neighborhoods impacted by truck, rail, and marine traffic to and from the Port. The Board of Supervisors will be considering approval of a consulting agreement with AECOM Technical Services to develop the Boggs Tract Sustainable Community Plan on June 16, 2020.

Why has not the Port of Stockton done a cumulative traffic analysis for the Port of Stockton's area of stewardship, and including a frequency analysis of trucks traveling through the neighborhood that are associated with operations at the Port?

Greenhouse Gases

SJVAPCD regulates both direct and indirect GHG emissions. Direct GHG emissions would include emissions resulting from a specific operation or process. Indirect GHG emissions would include emissions resulting from project related energy consumption. For projects resulting in increased vehicle miles traveled (VMT), indirect GHG emissions associated with transportation related activities would be included in the GHG emissions quantification. SJVAPCD requires all projects to reduce their GHG emissions, whether through project design elements or mitigation. SJVAPCD recommends determining whether the GHG emissions would result in a 29% reduction compared to business as usual. Global warming potential (GWP) is a measure of how much a given mass of GHG contributes to global warming. The GWP is determined using a CO_2 based scale for scaling. The following GWP's are used to determine the CO_2 equivalence (CO_2e):

Table 7
Operational Greenhouse Gas Emissions (Metric Tons per Year)

Source Category	CO_2	CH_4	N_2O	CO_2e
Year 2020				
Trucks	1,275	0.00	0.20	1,337
Rail	270	0.02	0.01	272
Employee Vehicles	7	0.00	0.00	7
Mobile on Site	85	0.01	0.00	85
Year 2020 Total	**1,636**	**0.03**	**0.21**	**1,701**

Notes:
Emissions might not add precisely due to rounding.
Rail emissions reflect switcher and line-haul locomotives.

[10] http://www.stocktongov.com/files/Appendix%20-%20Transportation%20Impact%20Analysis%20Guidelines.pdf

CO_2 = 1, CH_4 = 21, N_2O = 310, and Refrigerants range from 76 to 12,240. Table 7 above shows the proposed project's total operational GHG emissions, 1,701 metric tons of CO_2e per year, estimated using CalEEMod. Operational emissions included line-haul locomotives, switching locomotives, and on-road vehicles, onsite only. Therefore, according to the IS/MND impacts are considered less than significant if less than 10,000 metric tons per year. The DSG disagrees with this analysis because it fails to consider the total rail and truck transportation miles to and from the cottonseed distribution facility.

Why are operational greenhouse gas emissions limited to project site activities and do not account for distribution transport to and from the site?

The IS/MND stated that the project's conflict with the City of Stockton's Climate Action Plan and California Air Resources Board's 2017 Climate Change Scoping Plan Update was less than significant after implementing the following mitigation measures, without specifying a monitoring plan:

- **ENG-MM-1**: Truck Idling Reductions. CVAG will require trucks to minimize idling time to 2 minutes where available while on terminal. Truckers will be required to shut down trucks while waiting more than 2 minutes while on the terminal or CVAG will implement programs, such as appointment systems in periods of congestion. Exceptions include vehicles in a queue waiting for work at the truck rack.
- **ENG-MM-2:** Use of Clean Trucks. Where possible, CVAG will encourage the use of clean trucks (defined as model year 2017 or newer) to transport fuel. CVAG will educate customers about the SJVAPCD Truck Replacement Program during contract discussions.
- **ENG-MM-3**: Energy/Waste Audit. CVAG will develop a plan for reducing overall energy use at its terminal. The plan will incorporate the following measures at a minimum: replace less-efficient bulbs with energy-efficient light bulbs, where applicable and identify areas for waste reduction, including reductions in single use products in terminal buildings.

The City's Envision Stockton 2040 General Plan includes two policies that are applicable according to the IS/MND:

- Policy TR-3.2 requires new development and transportation projects to reduce travel demand and greenhouse gas emissions, support electric vehicle charging, and accommodate multi-passenger autonomous vehicle travel as much as feasible. thereby reducing GHG emissions.
- Policy CH-5.2 expands opportunities for recycling, re-use of materials, and waste reduction.

The California Air Resources Board's 2017 Climate Change Scoping Plan Update describes how California will reduce the states GHG emissions by 2030 to 40% below 1990 levels.

Impacts on GHG plans and regulations compliance, according to the IS/MND, would be considered significant without mitigation and less than significant with implementation of these mitigation measures: ENG-MM-1, ENG-MM-2, and ENG-MM-3. These measures include truck idling reductions, CVAG encouragement to use of clean trucks, and completing an energy/waste audit. The DGS Group disagrees with this analysis and limited mitigation proposals which lack a monitoring plan. The DSG suggests that more innovative measures are considered when promoting the use of clean trucks (defined as model year 2017 or newer) to transport fuel and the SJVAPCD programs. Incentive pricing could be offered for companies using newer trucks to transport cottonseeds or higher prices for companies using older trucks. These pricing incentives could be used to purchase trees and maintain a vegetative barrier around the project. Additionally, the Port could require that the auxiliary generator onsite be energy efficient with decreased emissions.

How will the Port of Stockton make available this required energy audit?

Energy

The IS/MND stated that the project does not currently include project-level measures that comply with the City's *Envision Stockton 2040 General Plan* policies pertaining to energy use. Impacts would therefore be considered significant without mitigation. According to the IS/MND the following mitigation measures would be implemented to address energy consumption and reduce GHG emissions in compliance with the City's *Envision Stockton 2040 General Plan*: ENG-MM-1, ENG-MM-2, and ENG-MM-3, described above.

The IS/MND stated that continued implementation of the Port's Renewable Portfolio Standard Procurement Plan would ensure that the proposed project does not conflict with state regulations pertaining to renewable energy. Since failing to comply with the first compliance period renewable energy requirements (2011-2013)[11], the Port was deemed compliant for the second compliance period (2014-2016)[12] and the current status is not yet determined. Whether or not the Port complies with state requirements seems not to relate this project's compliance with City of Stockton's requirements since PG&E is stated to be the supplier of electricity. The IS/MND stated that implementation of the ENG-MM-1, ENG-MM-2, and ENG-MM-3 would ensure efficient consumption of resources and reduce the proposed project's impacts to a less-than-significant level. The applicable mitigation measure calls for CVAG to develop a plan for reducing overall energy use at its terminal, but not how that energy plan would be made available to the residents of Stockton.

Stormwater

Most of the project site is surfaced with impermeable concrete, with some small areas surfaced in low-permeability compacted earth. Stormwater runoff within the project area is collected via a system of grated inlets throughout the project site. The storm drains would be equipped with filters and convey stormwater to a system of culvert pipes that extend north to south beneath the project site before conveyance to a concrete-lined drainage channel immediately south of the project site. The concrete-lined drainage channel conveys stormwater westward until it is ultimately pumped into a stormwater retention basin across Navy Drive from the project site. Stormwater while in the retention basin may percolate into the groundwater. During years when the retention basin reaches a high level, stormwater is pumped to the San Joaquin River.

The Port of Stockton is a highly developed and industrialized area characterized by storage tanks, industrial buildings, concrete surfaced storage or staging areas, stockpiles of various commodities, roadways, and rail lines. The nearest features that may provide notable wildlife habitat include a concrete-lined drainage channel and a stormwater retention basin located approximately 580 feet south and 1,000 feet west of the project site, respectively. The Burns Cutoff (tributary to the San Joaquin River) is located approximately 2,000 feet west of the project site, shown below. Runoff from the project site is conveyed to these features via a culvert system. The following mitigation measures would be implemented to reduce potential construction and operational impacts to off-site sensitive habitats from spills or polluted runoff:

- **BIO-MM-1**: Standard construction best management practices—including but not limited to use of storm drain inlet filters, erosion control (e.g., straw wattles), and maintenance of spill control kits—will be implemented during construction to control or respond to spills or other potential sources of construction-related pollution.
- **BIO-MM-2**: Operation of the proposed facility will include implementation of the facility Safety Management Program, which includes plans for spill prevention, control, and management. As a component of the Safety Management Program, CVAG will provide annual CERS submittals detailing quantities and management of potentially hazardous materials at the proposed facility.

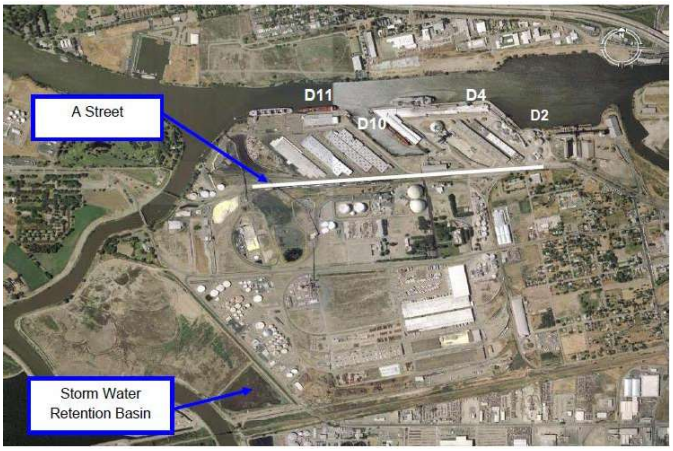
[11] https://www.energy.ca.gov/files/business-meeting-packets-february-21-2018 or https://www.energy.ca.gov/filebrowser/download/1036
[12] https://efiling.energy.ca.gov/GetDocument.aspx?tn=226534-5&DocumentContentId=57337

Why was not a summary of the documentation related to mitigation Bio-MM1 provided since construction on the site is complete. Why was not the facilities Safety Management Plan provided with the IS/MND and made available to the public?

The Port of Stockton's Stormwater Development Plan (SDP)[13] describes the three subareas (and requirements to ensure compatibility with the California Regional Water Quality Control Board (CVRWQCB)-issued Municipal Separate Storm Water Sewer System National Pollutant Discharge Elimination System Permit.[14] The project is located within the East Complex south of "A" Street subarea, shown below. For projects in this area the Port has identified best management practices to address stormwater problems. The following picture shows the subareas and the stormwater retention pond where runoff from the cottonseed distribution terminal drains. The DSP states that development work cannot begin until the CEQA process is complete and the Port has granted approval. The product's CEQA process is now underway, and the project's construction is complete, and operations began spring 2019.

Why was the CEQA process postponed since spring 2019 when operations began?

The Port of Stockton completed the DSP and approval was received from the CVRWQCB on November 17, 2005. The DSP became mandatory for the Port and its tenants on February 17, 2006. In response to the United Stated Environmental Protection Agency audit findings[15], the DSP was revised, and the changes became effective on June 1, 2009. The Port of Stockton DSP is a public accessible document and may be obtained by contacting the Port of Stockton Environmental Department at (209) 946-0246 but is not available by downloading it at http://www.stocktonport.com as indicated in the DSP.



Why does the Port of Stockton, as a public agency, not make available important environmental documents related to the area that the Port of Stockton has stewardship responsibility, including the DSP? Why not make available a summary of all environmental documents that affect soil, water and air quality and made readily accessible to the public?

Mandatory minimum best management practice in the DSP requires that all roof drains be directed to a permeable area or an infiltration trench to capture runoff from the first 0.75 inches of rain of each storm event. At its discretion, the Port may elect to perform a pre-construction inspection and site assessment which likely did not happen since the CEQA process was not complete. As described in the Port's Storm Water Management Plan, the Port will inspect all construction sites for compliance with its SWPPP and tenant agreements at least once every two weeks during the wet season, and once a month during the dry season, until construction is terminated. Once construction is complete, the Port will perform a "Final" inspection to assure that the best management practices and treatment control measures were installed to the approved specification and that they are functioning properly. No information was provided to describe whether a final

[13] https://www.sjgov.org/uploadedfiles/sjc/departments/supportserv/open_bids/bids/exhibit%20d%20to%20addendum%201_port%20development%20standards%20plan.pdf

[14] https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/fresno/r5-2011-0005-02.pdf

[15] https://www3.epa.gov/region9/water/npdes/pdf/ms4/ca/Port-of-Stockton.pdf
https://www3.epa.gov/region9/water/npdes/pdf/ms4/ca/StocktonPort_AOC.pdf

inspection was performed following construction. Annually, the Environmental Department will inspect the facility to assure that the best management practices and treatment control measures are in use and are being properly maintained. The facility will be notified of any deficiencies and a time schedule will be set to correct any problems. The project has been in operation for a year.

The minimum mandatory mitigation measures for projects in this area of the Port of Stockton include but are not limited to fuel dispensing area requirements as outlined in CASQA BMP Handbook SD-30. The IS/MND stated that mitigation measures BIO-MM-1 and BIO-MM-2 would be implemented to control spills and runoff during construction and operation. With implementation of these mitigation measures, the proposed project would have less than- significant impacts to water quality, according to the IS/MND. Additional mitigation measures are required according to the Port of Stockton DSP and NPDES Permit.[16] Specifically CASQA Stockpile Management WM-3 calls for measures that will reduce erosion and runoff of stockpiled materials.[17] Additional environmental analyses and mitigation requirements are necessary to be in compliance with Port of Stockton NPDES permit relating to tenants.

Why are not all Port of Stockton annual inspection reports for all facilities, including the project site made available on the Port of Stockton website under the environmental page[18]? Why was not CASQA WM-3, stockpile management, required while at the same time, a stockpile permit is required by the SJVAPCB?

Thank you for considering our comments on the May 2020 Central Valley Ag Group Bulk Whole Cottonseed Transload Facility Initial Study/Mitigated Negative Declaration for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton. DSG's review indicate that additional environmental analyses and mitigations are necessary to comply with local, regional, and state regulatory guidance related to operational activities, cottonseed characterization, air quality, greenhouse gas emissions, energy, and stormwater management. The Delta Sierra Group welcomes opportunities to discuss the Port of Stockton's public outreach efforts related to this project and to the Port of Stockton's public information dissemination.

Sincerely,

Mary Elizabeth M.S., R.E.H.S.
Delta-Sierra Group Conservation Chair
Melizabeth.sierra@gmail.com
P.O. Box 9258, Stockton CA 95208

Kevin D. Hamilton, RRT
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Cc:
Boggs Tract Community Center Advisory Board, raguilera@sjgov.org, eboyette@sjgov.org, frodriguez@sjgov.org
Port of Stockton Commissioners, mrodriguez@stocktonport.com
Stockton Diocese, Catholic Charities Environmental Justice, jpruitt@ccstockton.org, vtovar@ccstockton.org
San Joaquin Valley Air Pollution Control District, ab617@valleyair.org
Central Valley Water Quality Control Board, yang,jenna@waterboards, elizabeth.lee@waterboards.ca.gov
City of Stockton Council Members, city.clerk@stocktonca.gov
Board of Supervisors, rdebord@sjgov.org

[16] https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/fresno/r5-2011-0005-02.pdf
[17] http://www.stancounty.com/publicworks/pdf/development/npdes/wm-03.pdf
[18] https://www.portofstockton.com/storm-drain-vs-sewer-drain/

From:	Cultural Resource Department Inbox
To:	Nick Duffort; Cultural Resource Department Inbox; Ralph T. Hatch
Cc:	"jcashman@stocktonport.com"; Smith, Falynne; Katie Chamberlin
Subject:	RE: Available for Review - CEQA ISMND for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton
Date:	Thursday, May 21, 2020 10:45:29 AM
Attachments:	image001.png 1_Mitigation_Measures_CEQA_Avoidance.docx 2_Mitigation_Measures_CEQA NativeAmericanMonitors.docx 3_Mitigation_Measures_CEQA_Discoveries.docx 4_Mitigation_Measures_CEQA_Construction_Worker_Awareness_Training 04-19-19.docx

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[EXTERNAL EMAIL]

Good morning,

Wilton Rancheria received a letter from Anchor QEA dated May15, 2020 formally notifying us of a proposed project, the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton Project in the City of Stockton, and an opportunity to consult under AB 52. This letter is notice that Wilton Rancheria would like to initiate consultation under AB 52.

We would like to discuss the topics listed in Cal. Public Resources Code section 21080.3.2(a), including the type of environmental review to be conducted for the project; project alternatives; the project's significant effects; and mitigation measures for any direct, indirect, or cumulative impacts the project may cause to tribal cultural resources. As consultation progresses, we may also wish to discuss design options that would avoid impacts to tribal cultural resources; the scope of any environmental document that is prepared for the project; pre-project surveys; and tribal cultural resource identification, significance evaluations and culturally-appropriate treatment.

This letter is also a formal request to allow Wilton Rancheria tribal representatives to observe and participate in all cultural resource surveys, including initial pedestrian surveys for the project. Please send us all existing cultural resource assessments, as well as requests for, and the results of, any records searches that may have been conducted prior to our first consultation meeting. If tribal cultural resources are identified within the project area, it is Wilton Rancheria's policy that tribal monitors must be present for all ground disturbing activities. Finally, please be advised that our preference is to preserve tribal cultural resources in place and avoid them whenever possible. Subsurface testing and data recovery must not occur without first consulting with Wilton Rancheria and receiving Wilton Rancheria 's written consent.

In the letter Nick Duffort is identified as the lead contact person for consultation on the proposed project. Mariah Mayberry will be Wilton Rancheria's point of contact for this consultation. Please contact Mariah by phone (916) 683-6000 ext. 2023 or email at mmayberry@wiltonrancheria-nsn.gov to begin the consultation process.

Thank you for involving Wilton Rancheria in the planning process at an early stage. We ask that you make this letter a part of the project record and we look forward to working with you to ensure that tribal cultural resources are protected.

Sincerely,

Mariah Mayberry
Wilton Rancheria
Tel: 916.683.6000 ext 2023 | Fax: 916.683.6015
9728 Kent Street | Elk Grove | CA | 95624
mmayberry@wiltonrancheria-nsn.gov
wiltonrancheria-nsn.gov

From: Nick Duffort <nduffort@anchorqea.com>
Sent: Friday, May 15, 2020 3:42 PM
To: Cultural Resource Department Inbox <crd@wiltonrancheria-nsn.gov>; Ralph T. Hatch <rhatch@wiltonrancheria-nsn.gov>
Cc: 'jcashman@stocktonport.com' <jcashman@stocktonport.com>; Smith, Falynne <fsmith@stocktonport.com>; Katie Chamberlin <kchamberlin@anchorqea.com>
Subject: Available for Review - CEQA ISMND for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton

Dear Tribal Representatives,
On behalf of the Port of Stockton (Port), we are providing notice that the Port has released for public review and comment an Initial Study/ Mitigated Negative Declaration (IS/MND) for the Central Valley Ag Group Bulk Whole Cottonseed Transload Facility at the Port of Stockton (the project). The project involves establishing a new transloading facility at the Port of Stockton to receive whole cottonseed by rail and transport it out by truck.

The IS/MND is available for review at the Port of Stockton (2201 West Washington Street, Stockton, California 95203) and an electronic copy of the IS/MND is available for review at https://www.portofstockton.com/ceqa-documents/. The review period starting date is May 15, 2020 and ending date is June 15, 2020. Please submit your comments on the IS/MND by email to jcashman@stocktonport.com or by mail to Jason Cashman, Environmental Manager, Port of Stockton, 2201 West Washington Street, Stockton, California 95203. Emails must be received by June 15, 2020. Comment letters must be postmarked by June 15, 2020.

Thank you.

Nicolas Duffort

ANCHOR QEA, LLC
130 Battery Street, Suite 400
San Francisco, CA 94111
D 415.361.5158
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E nduffort@anchorqea.com

Tribal Cultural Resource Avoidance Mitigation Measure

Avoidance and preservation in place is the preferred manner of mitigating impacts to tribal cultural resources and will be accomplished by several means, including:

- Planning construction to avoid tribal cultural resources, archaeological sites and/ or other resources; incorporating sites within parks, green-space or other open space; covering archaeological sites; deeding a site to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity. Recommendations for avoidance of cultural resources will be reviewed by the CEQA lead agency representative, interested Native American Tribes and the appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project area to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource. Native American Representatives from interested Native American Tribes will be allowed to review and comment on these analyses and shall have the opportunity to meet with the CEQA lead agency representative and its representatives who have technical expertise to identify and recommend feasible avoidance and design alternatives, so that appropriate and feasible avoidance and design alternatives can be identified.

- If the resource can be avoided, the construction contractor(s), with paid Native American monitors from culturally affiliated Native American Tribes present, will install protective fencing outside the site boundary, including a buffer area, before construction restarts. The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an "Environmentally Sensitive Area". Native American representatives from interested Native American Tribes and the CEQA lead agency representative will also consult to develop measures for long term management of the resource and routine operation and maintenance within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional Cultural Properties and cultural landscapes, in accordance with state and federal guidance including National Register Bulletin 30 (*Guidelines for Evaluating* and *Documenting Rural Historic Landscapes*), Bulletin 36 (*Guidelines for Evaluating and Registering Archaeological Properties*), and Bulletin 38 (*Guidelines for Evaluating and Documenting Traditional Cultural Properties*); National Park Service Preservation Brief 36 (*Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes*) and using the Advisory Council on Historic Preservation (ACHP) *Native American Traditional Cultural Landscapes Action Plan* for further guidance. Use of temporary and

permanent forms of protective fencing will be determined in consultation with Native American rrepresentatives from interested Native American Tribes.

Native American Monitoring Mitigation Measure

To minimize the potential for destruction of or damage to existing or previously undiscovered burials, archaeological and tribal cultural resources and to identify any such resources at the earliest possible time during project-related earthmoving activities, THE PROJECT PROPONENT and its construction contractor(s) will implement the following measures:

- Paid Native American monitors from culturally affiliated Native American Tribes will be invited to monitor the vegetation grubbing, stripping, grading or other ground-disturbing activities in the project area to determine the presence or absence of any cultural resources. Native American representatives from cultural affiliated Native American Tribes act as a representative of their Tribal government and shall be consulted before any cultural studies or ground-disturbing activities begin.

- Native American representatives and Native American monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted or slowed if such sites or objects are identified within the direct impact area. Only a Native American representative can recommend appropriate treatment of such sites or objects.

- If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or bone, are discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a archaeologist who meets the Secretary of the Interior's qualification standards can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the Caltrans, the SHPO, and other appropriate agencies. Appropriate treatment measures may include development of avoidance or protection methods, archaeological excavations to recover important information about the resource, research, or other actions determined during consultation.

- In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities, the construction contractor or the County, or both, shall immediately halt potentially damaging excavation in the area of the burial and notify the County coroner and a qualified professional archaeologist to determine the nature of the remains. The coroner shall examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands, in accordance with Section 7050(b) of the Health and Safety Code. If the coroner determines that the remains are those of a Native American, he or she shall contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). After the coroner's findings are presented, the County, the archaeologist, and the NAHC-designated Most Likely Descendant (MLD) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed.

Inadvertent Discoveries Mitigation Measures

Develop a standard operating procedure, points of contact, timeline and schedule for the project so all possible damages can be avoided or alternatives and cumulative impacts properly accessed.

If potential tribal cultural resources, archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered by Native American Representatives or Monitors from interested Native American Tribes, qualified cultural resources specialists or other Project personnel during construction activities, work will cease in the immediate vicinity of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from an interested Native American Tribe is present. A qualified cultural resources specialist and Native American Representatives and Monitors from culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. These recommendations will be documented in the project record. For any recommendations made by interested Native American Tribes which are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If adverse impacts to tribal cultural resources, unique archeology, or other cultural resources occurs, then consultation with Wilton Rancheria regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 should occur, in order to coordinate for compensation for the impact by replacing or providing substitute resources or environments.

Tribal Cultural Resource – Awareness Training - Mitigation Measure

A consultant and construction worker tribal cultural resources awareness brochure and training program for all personnel involved in project implementation will be developed in coordination with interested Native American Tribes. The brochure will be distributed and the training will be conducted in coordination with qualified cultural resources specialists and Native American Representatives and Monitors from culturally affiliated Native American Tribes before any stages of project implementation and construction activities begin on the project site. The program will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The worker cultural resources awareness program will also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and will outline what to do and whom to contact if any potential archaeological resources or artifacts are encountered. The program will also underscore the requirement for confidentiality and culturally-appropriate treatment of any find of significance to Native Americans and behaviors, consistent with Native American Tribal values.

Appendix B
Air Quality Modeling

Appendix A. Operation Calculations

Table E.1.

Significance Thresholds (ton/yr)					
PM10	PM2.5	NOX	SOX	CO	VOC
15	15	10	27	100	10
Source:					
SJVAPCD. Air Quality Thresholds of Significance – Criteria Pollutants. March 19, 2015. http://www.valleyair.org/transportation/ceqa_idx.htm					
Notes:					
Thresholds apply to both on-site and off-site emissions. PM emissions include exhaust and fugitive dust.					
NAAQS/CAAQS Screening Level (lb/day)					
PM10	PM2.5	NOX	SOX	CO	VOC
100	100	100	100	100	100
Source:					
SJVAPCD. Ambient Air Quality Analysis Project Daily Emissions Assessment. May 31, 2013. http://www.valleyair.org/transportation/ceqa_idx.htm					
Notes:					
Thresholds apply to on-site emissions only.					

Table E.2.

Annual Operational Emissions in SJVAPCD - Project (ton/yr)

Source Category	**PM10**	**PM2.5**	**NOX**	**SOX**	**CO**	**VOC**
Year 2020						
Trucks	0.23	0.07	4.58	0.01	0.68	0.19
Rail	0.02	0.02	0.87	0.00	0.26	0.04
Employee Vehicles	0.00	0.00	0.00	0.00	0.02	0.00
Material Handling Dust	0.12	0.12				
Mobile Onsite	0.01	0.01	0.33	0.00	0.35	0.03
Year 2020 Total	0.38	0.22	5.79	0.02	1.31	0.26
CEQA Impacts						
Significance Threshold	15	15	10	27	100	10
Significant?	**No**	**No**	**No**	**No**	**No**	**No**
Notes:						
Emissions might not add precisely due to rounding.						
PM10 and PM2.5 truck emissions include exhaust and road dust.						
Rail emissions reflect switcher and line-haul locomotives.						
Material handling dust refects dust emissions from product handling at the terminal.						

Table E.3.
Average Daily Operational Emissions, On-Site - Project (lb/day)

Source Category	PM10	PM2.5	NOX	SOX	CO	VOC
Year 2020						
Trucks On-Site	0.15	0.0	0.4	0.0	0.1	0.0
Rail On-Site	0.05	0.0	1.4	0.0	0.4	0.1
Material Handling Dust	0.7	0.7				
Mobile Onsite	0.1	0.0	1.8	0.0	1.9	0.2
Year 2020 Total	0.9	0.8	3.6	0.0	2.4	0.3
CEQA Impacts						
Significance Threshold	100	100	100	100	100	100
Significant?	No	No	No	No	No	No

Notes:
Emissions might not add precisely due to rounding.
Truck emissions include truck transit on-site and truck idling on-site.
Rail emissions reflect 1 switching event onsite.
PM10 and PM2.5 truck emissions include onsite exhaust and road dust.
Material handling dust refects dust emissions from product handling at the terminal.

Table E.4.
Annual Operation GHG Emissions in CA - Proposed Project (mty)

Source Category	CO2	CH4	N2O	CO2e
Year 2020				
Trucks	1,275	0.00	0.20	1,337
Rail	270	0.02	0.01	272
Employee Vehicles	7	0.00	0.00	7
Mobile Onsite	85	0.01	0.00	85
Year 2020 Total	1,636	0.03	0.21	1,701

Notes:
Emissions might not add precisely due to rounding.
Rail emissions reflect switcher and line-haul locomotives.

Table E.5.
Activity

Year	Total Volume (ton/yr)	Product	Truck Outbound Activity: Tons of Product (ton/yr)	Annual Trucks	Annual Truck Trips (1-way)	Daily Truck Trips (1-way)	Rail Inbound Activity: Tons of Product (ton/yr)	Annual Rail Cars	Annual Switcher Rail Trips (1-way)	Annual Manifest Rail Trips (1-way)	Daily Rail Trips (1-way)	Manifest Rail Miles Traveled (1-way)
Year 2020	96,000	cottonseed	96,000	3,840	7,680	32	96,000	960		192	0.8	60

Source:
E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.

Average truck transit distances assumed based on previous Port documents. E-mail: E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.

Average rail transit distances assumed based on previous Port documents. E-mail: E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.
Notes:
All calls are expressed in one-way moves.

Truck capacity (ton/truck)	25
Rail car capacity (ton/railcar)	100
Project rail cars per manifest train	10
Project rail cars per switcher train	10

UPRR drops empties and pulls full cars from the Port of Stockton rail yards operated by the Port's Short Line. Regardless of where the final destination of the cars might be, all full and empty cars are assembled at UPRR's yard in Roseville, CA (approx. 60 miles).
Schedule

days per month	20
months/year	12

Table E.6.
Truck Activity and Exhaust Emissions

Year	Activity: Annual Truck Trips (1-way)	Distance Traveled (mi/1-way)	Distance Traveled (mi/1-way) in CA	Idling Time (hr/call)	Total Exhaust, Tire Wear, Brake Wear Emissions (lb/yr): DPM	PM10	PM2.5	NOX	SOX	CO	VOC	CO2	CH4	N2O	CO2e
Year 2020															
Transit On-Site	7,680	0.25			0.14	0.56	0.29	25.67	0.07	3.79	1.06	7,885	0.05	1.24	8,271
Idling On-Site	7,680			0.33	0.32	0.32	0.31	106.21	0.25	28.27	7.14	26,517	0.00	4.17	27,809
Transit and Idling Off-Site	7,680	88	88		50.86	196.48	101.49	9,034.48	26.22	1,334.96	373.13	2,775,660	17.33	436.30	2,911,276
Total On-Site					0.47	0.88	0.60	131.88	0.33	32.06	8.20	34,403	0.05	5.41	36,080
Total Off-Site					50.86	196.48	101.49	9,034.48	26.22	1,334.96	373.13	2,775,660	17.33	436.30	2,911,276
Total					51.32	197.37	102.09	9,166.35	26.55	1,367.02	381.33	2,810,063	17.38	441.70	2,947,356

Notes:
Activity provided in E-mail: E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.
Transit distance onsite obtained from GoogleEarth and facilit 0.25 miles 1-way
Idling time onsite: 20 min per call
Average truck transit distances assumed based on previous Port documents. E-mail: E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.

Table E.7.
Truck Entrained Road Dust Emissions
Paved Road Dust Emission Factor Derivation

Emission Source	(sL) Silt Loading (g/m2)	(k) Particle Size Multiplier - PM10 (g/VMT)	(k) Particle Size Multiplier - PM2.5 (g/VMT)	(W) Average Vehicle Weight on Road (tons)	(E) Uncontrolled PM10 Emission Factor (g/VMT)	(E) Uncontrolled PM2.5 Emission Factor (g/VMT)
Onsite Trucks	0.6	1.00	0.15	20.0	**12.81**	**1.92**
Offsite Roadway (all vehicles) - CARB 2016						
Freeway Statewide	0.015	1.00	0.15	2.4	0.05	0.01
Major Statewide	0.032	1.00	0.15	2.4	0.10	0.02
Collector Statewide	0.032	1.00	0.15	2.4	0.10	0.02
Local Statewide	0.32	1.00	0.15	2.4	0.83	0.12
Local Rural SJVAPCD	0.32	1.00	0.15	2.4	0.83	0.12

Notes:
1. Emission factors are calculated using CARB's Miscellaneous Process Methodology 7.9, Entrained Road Travel, Paved Road Dust. November 2016. Last accessed on 12/2019 at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-9_2016.pdf.
2. Emission factors exclude engine exhaust, tire wear, and brake wear, which are accounted for in EMFAC calculations.
3. The equation is: E = k (sL)^0.91 x (W)^1.02
4. SJV experiences 55 annual rainfall days. CARB's Miscellaneous Process Methodology 7.9, Entrained Road Travel, Paved Road Dust, Table 8.

Composite Paved Road Dust Emission Factors for Project Trips

Road Type	Million VMT per year	Fraction of Travel by Roadway Type: Freeway	Major	Collector	Local Urban	Local Rural	Composite EF for Offsite Transit: PM10 (g/VMT)	PM2.5 (g/VMT)
Vehicle Trips in San Joaquin	6485	0.456	0.351	0.117	0.058	0.020	**0.14**	**0.02**

Source:
CARB's Miscellaneous Process Methodology 7.9, Entrained Road Travel, Paved Road Dust, Table 6.
November 2016. Last accessed on 12/2019 at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-9_2016.pdf.

Table E.8.
Employee Vehicle Activity and Emissions

Year	Activity: Number of Employees	Annual Employee Trips (1-way trips)	Distance Traveled (mi/1-way)	Emissions (lb/yr): PM10	PM2.5	NOX	SOX	CO	VOC	CO2	CH4	N2O	CO2e	Emissions (ton/yr): PM10	PM2.5	NOX	SOX	CO	VOC	(mton/yr): CO2	CH4	N2O	CO2e
Year 2020	2	1,460	16.8	3	1	3	0	41	1	15,243	0	0	15,342	0.00	0.00	0.00	0.00	0.02	0.00	6.91	0.00	0.00	6.96

Source:
Transit Distance obtained from CalEEMod, Appendix D, Table 4.2 for SJVAPCD. Rural designation was used conservatively.
Activity provided by CVAG.

Table E.9.
EMFAC Output - Trucks
EMFAC2017 (v1.0.2) Emission Rates
Region Type: Air Basin
Region: SAN JOAQUIN VALLEY
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/day for VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HTSK and RUNLS, g/vehicle/day for IDLEX, RESTL and DIURN

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Population	VMT	Trips	ROG_RUNEX	ROG_IDLEX	ROG_STREX	ROG_HOTSOAK	ROG_RUNLOSS	ROG_RESTLOSS	ROG_DIURN	TOG_RUNEX	TOG_IDLEX	TOG_STREX	TOG_HOTSOAK	TOG_RUNLOSS	TOG_RESTLOSS	TOG_DIURN	CO_RUNEX	CO_IDLEX
SAN JOAQUIN VALLEY	2020	T7 other port	Aggregated	Aggregated	DSL	277.1187	44538.94	2106.101793	0.25043	1.642471	0	0	0	0	0	0.285096	1.869828	0	0	0	0	0	0.895977	17.10392

Region	CO_STREX	NOx_RUNEX	NOx_IDLEX	NOx_STREX	CO2_RUNEX	CO2_IDLEX	CO2_STREX	CH4_RUNEX	CH4_IDLEX	CH4_STREX	PM10_RUNEX	PM10_IDLEX	PM10_STREX	PM10_PMTW	PM10_PMBW	PM2_5_RUNEX	PM2_5_IDLEX	PM2_5_STREX	PM2_5_PMTW	PM2_5_PMBW	SOx_RUNEX	SOx_IDLEX	SOx_STREX	N2O_RUNEX	N2O_IDLEX	N2O_STREX
SAN JOAQUIN VALLEY	0	6.063623	28.60111	1.035967	1862.925	4730.344	0	0.011632	0.076289	0	0.034133	0.009601	0	0.036	0.06174	0.032656	0.009186	0	0.009	0.02646	0.0176	0.04469	0	0.292826	0.743544	0

Table E.10.
EMFAC Output - Worker Vehicles
EMFAC2017 (v1.0.2) Emission Rates
Region Type: Air Basin
Region: SAN JOAQUIN VALLEY
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/day for VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HTSK and RUNLS, g/vehicle/day for IDLEX, RESTL and DIURN

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	Population	VMT	Trips	ROG_RUNEX	ROG_IDLEX	ROG_STREX	ROG_HOTSOAK	ROG_RUNLOSS	ROG_RESTLOSS	ROG_DIURN	TOG_RUNEX	TOG_IDLEX	TOG_STREX	TOG_HOTSOAK	TOG_RUNLOSS	TOG_RESTLOSS	TOG_DIURN	CO_RUNEX	CO_IDLEX
SAN JOAQUIN VALLEY	2020	LDA	Aggregated	Aggregated	GAS	1563929	61618374	7330283.006	0.013553	0	0.297858	0.1303542	0.25563	0.275145124	0.380517931	0.019758	0	0.326114	0.130354	0.25563	0.275145	0.380518	0.775141	0
SAN JOAQUIN VALLEY	2020	LDA	Aggregated	Aggregated	DSL	11783.98	492079	55836.45752	0.018396	0	0	0	0	0	0	0.020943	0	0	0	0	0	0	0.239962	0
SAN JOAQUIN VALLEY	2020	LDA	Aggregated	Aggregated	ELEC	17950.34	708392.5	90267.07092	0	0	0	0.004888	0	0.010167802	0.029254551	0	0	0	0.004888	0	0.010168	0.029255	0	0

Region	CO_STREX	NOx_RUNEX	NOx_IDLEX	NOx_STREX	CO2_RUNEX	CO2_IDLEX	CO2_STREX	CH4_RUNEX	CH4_IDLEX	CH4_STREX	PM10_RUNEX	PM10_IDLEX	PM10_STREX	PM10_PMTW	PM10_PMBW	PM2_5_RUNEX	PM2_5_IDLEX	PM2_5_STREX	PM2_5_PMTW	PM2_5_PMBW	SOx_RUNEX	SOx_IDLEX	SOx_STREX	N2O_RUNEX	N2O_IDLEX	N2O_STREX
SAN JOAQUIN VALLEY	2.409607	0.053633	0	0.227269	285.6661	0	58.66917	0.003378	0	0.063855	0.001559	0	0.002094	0.008	0.03675	0.001433	0	0.001926	0.002	0.01575	0.002827	0	0.000581	0.005535	0	0.028797
SAN JOAQUIN VALLEY	0	0.116825	0	0	215.0272	0	0	0.000854	0	0	0.009729	0	0	0.008	0.03675	0.009308	0	0	0.002	0.01575	0.002033	0	0	0.033799	0	0
SAN JOAQUIN VALLEY	0	0	0	0	0	0	0	0	0	0	0	0	0	0.008	0.03675	0	0	0	0.002	0.01575	0	0	0	0	0	0

Table E.11.
EMFAC2017 Adjustment Factors
Adjustment Factors for EMFAC2017 Gasoline Light Duty Vehicles

Year	NOx Exhaust	TOG Evaporativ	TOG Exhaust	PM Exhaust	CO Exhaust
2021	1.0002	1.0001	1.0002	1.0009	1.0005

Notes:

EMFAC2017 automobile emission factors were corrected per CARB's guidance to reflect the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program" adopted by the USEPA and the National Highway Traffic Safety Administration (NHTSA). CARB EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One, Table 2. November 20, 2019. Last accessed March 4, 2020 at:
https://ww3.arb.ca.gov/msei/emfac_off_model_adjustment_factors_final_draft.pdf.
CARB did not issue adjustment factors for years prior to 2021. Use of 2021 adjustment factors is conservative.

Table E.12.
Emission Factors Used to Calculate Truck Idling Emissions
EMFAC2017 (v1.0.2) Emission Rates
Region Type: Air Basin
Region: SAN JOAQUIN VALLEY
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/day for VMT, g/mile for RUNEX, PMBW and PMTW

Region	Calendar Year	Vehicle Category	Model Year	Speed	Fuel	VMT	ROG_RUNEX	TOG_RUNEX	CO_RUNEX	NOx_RUNEX	SOx_RUNEX	CO2_RUNEX	CH4_RUNEX	PM10_RUNEX	PM2_5_RUNEX	N2O_RUNEX
SAN JOAQUIN VALLEY	2020	T7 other port	Aggregated	5	DSL	1896.7927	1.012206	1.152319469	4.007538	35.05538	0.035511	3758.8052	0.047014	0.045894386	0.043909015	0.590832

Notes:
Onsite idling emission factors for trucks were based on EMFAC2017 emissions at 5 mph for heavy duty trucks, corrected by a CARB-specified speed correction factor.

Table E.13.
Combined Rail Emissions

	Average Day Emissions (lb/day)						Annual Emissions (ton/yr)								
	PM10	PM2.5	NOX	SOX	CO	VOC	PM10	PM2.5	NOX	SOX	CO	VOC	CO2	CH4	N2O	CO2e
Year 2020																
Switchine																
Switching Onsite	0.05	0.05	1.45	0.00	0.39	0.08	0.01	0.01	0.26	0.00	0.07	0.02	32.26	0.00	0.00	
Switching in SJVAPCD	0.10	0.09	2.90	0.00	0.78	0.17	0.02	0.02	0.53	0.00	0.14	0.03	64.52	0.01	0.00	
Line Haul																
In SJVAPCD	0.03	0.03	1.90	0.00	0.62	0.06	0.01	0.01	0.35	0.00	0.11	0.01	43.51	0.00	0.00	
In Sacramento Metro	0.06	0.05	3.30	0.00	1.08	0.10	0.01	0.01	0.60	0.00	0.20	0.02	75.67	0.01	0.00	
In California													232.67	0.02	0.01	
Total																
In SJVAPCD	0.13	0.12	4.79	0.01	1.40	0.22	0.02	0.02	0.87	0.00	0.26	0.04	108.03	0.01	0.00	
In Sacramento Metro	0.06	0.05	3.30	0.00	1.08	0.10	0.01	0.01	0.60	0.00	0.20	0.02	75.67	0.01	0.00	
In California													297.20	0.02	0.01	300

Notes:

Switching assumes that 1 switch event occurs onsite and 1 additional switch event occurs on Port property. Since switching emissions assume 2 total switching events, the total switching emissions divided by 2 reflect onsite switching.

Table E.14.

Average Line-Haul Emissions		Empty Train		Filled Train		In SJVAPCD Total		In Sacramento Metro Total		In California Total	
Pollutant	Line-Haul Locomotive Emission Factor (g/gal)	Average Daily Emissions (lb/day)	Annual Emissions (ton/yr)	Average Daily Emissions (lb/day)	Annual Emissions (ton/yr)	Total Average Day Line-Haul Emissions (lb/day)	Total Annual Line-Haul Emissions (ton/yr)	Total Average Day Line-Haul Emissions (lb/day)	Total Annual Line-Haul Emissions (ton/yr)	Total Average Day Line-Haul Emissions (lb/day)	Total Annual Line-Haul Emissions (ton/yr)
Year 2020											
NOx	81.23	0.32	0.06	1.57	0.29	1.90	0.35	3.30	0.60		
PM10	1.36	0.01	0.00	0.03	0.00	0.03	0.01	0.06	0.01		
PM2.5	1.25	0.00	0.00	0.03	0.00	0.03	0.01	0.05	0.01		
VOC	2.40	0.01	0.00	0.05	0.01	0.06	0.01	0.10	0.02		
CO	26.62	0.11	0.02	0.52	0.09	0.62	0.11	1.08	0.20		
SOx	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
CO2	10,210.00	40.78	7.44	197.62	36.07	238.40	43.51	414.83	75.67	1274.92	232.67
CH4	0.80	0.00	0.00	0.02	0.00	0.02	0.00	0.03	0.01	0.10	0.02
N2O	0.26	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.03	0.01

Notes:
CO2e annual emissions are presented in short tons of CO2e per year.
Source: CARB. 2017 Line Haul / Class I Documentation https://www.arb.ca.gov/msei/ordiesel.htm and 2017
PM2.5 is 97% of PM10
HC emission factor converted to VOC = 1.053 * HC
Criteria pollutant emmissions are to the first point of rect.

Table E.15.
Line- Haul Fuel Usage

Parameter	Value	Units	Comment/Reference
Year 2020			
Product Volume to be Transported	96,000	tons/yr	E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.
Rail cars per year	960	annual rail cars	E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.
Rail cars per train	10	project rail cars per train	E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.
Net Aggregated Fuel Consumption Index (Gross Weight - Locomotive Weight) (Line Haul/ore)	868	ton-miles/gal	Calculated from: California Air Resources Board (ARB). 2017. "2016 Line Haul Locomotive Model & Update". October. Available at: https://www.arb.ca.gov/msei/ordiesel.htm
Locomotives			
Number of additional locomotives per train	0	locomotives/ train	Number represents the additional locomotives that would need to be placed on the train because of the project's additional rail cars. It is assumed that no additional locomotives would need to be put on a manifest train to accommodate the project's 10 rail cars.
Weight of locomotive	708	ton/locomotive	General Electric ET44C4
Miles traveled	23	miles/1-way	GoogleEarth.
Fuel consumption	0	gal/yr (1-way trip)	
Empty Rail Cars			
Weight of empty tank car	26	tons/car	Weight of empty rail typical 3250 cubic-foot GBX rail car used for cement products. Last accessed
Weight of empty tank cars oer vear	24,960	tons/vear	
Miles traveled	23	miles/1-way	GoogleEarth.
Fuel consumption	661	gal/yr (1-way trip)	
Product Transported			
Weight of product transported in year	96,000	tons/yr	
Miles traveled	23	miles/1-way	GoogleEarth.
Fuel consumption	2,543	gal/yr (1-way trip)	

Table E.16.
Fuel Consumption Index Calculation

Parameter	Value	Units
Roseville to Fresno: positive grade	0.0058	
Roseville to Fresno: negative grade	-0.0048	
Fuel productivity (CARB equation)	832	GTM/gal
Fresno to Roseville: positive grade	0.0048	
Fresno to Roseville: negative grade	-0.0058	
Fuel productivity (CARB equation)	904	GTM/gal
Composite Fuel Consumption Index	868	ton-mile/gal

Source: California Air Resources Board (ARB). 2017. "2016 Line Haul Locomotive Model & Update". October. Table 4-4 and Equation 4.2. Last accessed on 12/2/2019 at: https://www.arb.ca.gov/msei/ordiesel.htm

Table E.17.
SO2 Emission Factor - Line Haul

SO2 (g/gal)=	0.09	
(fuel density) * (MW SO2/ MW S) * (S content of fuel) * (conversion factor)		
Where:		
Fuel density	3.200	e/eal
the fraction of fuel sulfur converted to SO2	97.8%	
S content of fuel in parts per million (ppm)	15	ppm
S MW = Molecular Weight	32	
SO2 MW = Molecular Weight	64	

Table E.18.
Rail Transit Distance

	Distance (1-way miles)	Distance in SJVAPCD (1-way miles)	Distance in Sacramento Metro (1-way miles)	Total Distance to CA Boundary (1-way miles)	Direction
Port to Galt	23	23			N
Galt to Roseville rail yard	40		40		N
Roseville to CA boundary	100			123	NE

Source:
Google Earth

Table E.19.

U.S. EPA Emission Factors (g/gal)						Tier Distribution	Line Haul Project Emission Factors (g/gal)					Line Haul Project Emission Factors (g/gal)		
	PM10	PM2.5	HC	NOx	CO	2020		PM10	PM2.5	VOC	NOx	CO	CO2	CH4	N2O
Pre-Tier	6.66	6.13	9.98	270.4	26.62	0%	2020	1.36	1.25	2.40	81.23	26.62	10,210	0.798	0.255

Tier 0	6.66	6.13	9.98	178.88	26.62	0%
Tier 0+	4.16	3.83	6.24	149.76	26.62	1%
Tier 1	6.66	6.13	9.78	139.16	26.62	0%
Tier 1+	4.16	3.83	6.03	139.16	26.62	2%
Tier 2	3.74	3.44	5.41	102.96	26.62	0%
Tier 2+	1.66	1.53	2.7	102.96	26.62	36%
Tier 3	1.66	1.53	2.7	102.96	26.62	33%
Tier 4	0.31	0.29	0.83	20.8	26.62	28%

Source:
CARB. 2017 Line Haul / Class I Documentation. Last accessed on 3/5/2020 at: https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-
Tier distribution calculated by applying CARB Tier distribution for analysis year. CARB. 2017 Emissions Inventory Aggregated at County/Air

Source:
CO2: The Climate Registry. 2019 Emission Factors, Table 2.1.
CH4 and N2O: The Climate Registry. 2019 Emission Factors, Table 2.7.

Table E.20.
Line Haul Locomotives Tier Distribution

	Pre-Tier	Tier 0	Tier 0+	Tier 1	Tier 1+	Tier 2	Tier 2+	Tier 3	Tier 4
2018	0%	0%	2%	0%	7%	11%	33%	32%	14%
2019	0%	0%	2%	0%	2%	5%	38%	32%	21%
2020	0%	0%	1%	0%	2%	0%	36%	33%	28%
2021	0%	0%	1%	0%	1%	0%	31%	33%	34%
2022	0%	0%	0%	0%	1%	0%	24%	34%	40%
2023	0%	0%	0%	0%	1%	0%	19%	34%	46%
2024	0%	0%	0%	0%	1%	0%	13%	32%	53%
2025	0%	0%	0%	0%	0%	0%	8%	31%	60%
2026	0%	0%	0%	0%	0%	0%	3%	30%	67%
2027	0%	0%	0%	0%	0%	0%	3%	24%	73%
2028	0%	0%	0%	0%	0%	0%	2%	18%	80%
2029	0%	0%	0%	0%	0%	0%	2%	13%	86%
2030	0%	0%	0%	0%	0%	0%	1%	8%	91%
2031	0%	0%	0%	0%	0%	0%	1%	2%	97%
2032	0%	0%	0%	0%	0%	0%	0%	2%	97%
2033	0%	0%	0%	0%	0%	0%	0%	2%	98%
2034	0%	0%	0%	0%	0%	0%	0%	2%	98%
2035	0%	0%	0%	0%	0%	0%	0%	1%	99%
2036	0%	0%	0%	0%	0%	0%	0%	1%	99%
2037	0%	0%	0%	0%	0%	0%	0%	0%	100%
2038	0%	0%	0%	0%	0%	0%	0%	0%	100%
2039	0%	0%	0%	0%	0%	0%	0%	0%	100%
2040	0%	0%	0%	0%	0%	0%	0%	0%	100%

Source:
Tier distribution calculated by applying CARB Tier distribution for analysis year. CARB. 2017 Emissions Inventory Aggregated at County/Air Basin/State. Last accessed on 3/5/2020 at: https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road

Table E.21.
Switchine Fuel Usage Determination

Parameter	Value	Units	Reference
Year 2020			
Rail cars per year	960	annual rail cars	E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.
Rail cars per switcher train	30	cars per train	E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020.
Switcher trains per year	96	trains per year	Calculated
Number of locomotives required per switch at the Terminal	1	otives/switch	
Switching events at the Terminal	1	witches/train	Assumes: 1 switching event on property; 1 switching event elsewhere within the Port.
Switching time at the Terminal	1	hour	Past port documents.
Number of locomotives required per switch at the Port staeing yard	2	otives/switch	Past port documents.
Switching events at the Port staging yard	1	witches/train	Assumes: 1 switching event on property; 1 switching event elsewhere within the Port.
Switching time at the Port staging yard	2	hour	Past port documents.
Fuel used per hour per locomotive	11.9	r/locomotive	Calculated. See Switcher emission factor calculations.
Fuel used	80	gal/train	Calculated

Table E.22.
Average Switching Emissions

Pollutant	Switching Locomotive Emission Factor (g/gal)	Average Daily Emissions (lb/day)	Annual Emissions Emissions (ton/yr)
Year 2020			
NOx	83.61	2.90	0.53
PM10	2.96	0.10	0.02
PM2.5	2.72	0.09	0.02
VOC	4.8	0.17	0.03
CO	22.53	0.78	0.14
SOx	0.09	0.00	0.00
CO2	10,210.00	353.54	64.52
CH4	0.80	0.03	0.01
N2O	0.26	0.01	0.00

Notes:
CO2e annual emissions are presented in short tons of CO2e per year.
HC emission factor convered to VOC = 1.053 * HC
Source: Reflects switching fleet provided by Central California raction

Table E.23.
SO2 Emission Factor - Switchers

SO2 lb/gal=	0.09	
(fuel density) * (MW SO2/ MW S) * (S content of fuel) * (conversion factor)		
Where:		
Fuel density	3.200	e/gal
the fraction of fuel sulfur converted to SO2	97.8%	
S content of fuel in parts per million (ppm)	15	ppm
S MW = Molecular Weight	32	
SO2 MW = Molecular Weight	64	

Table E.24.

CCT Switchers[1]

Switcher Emission Factors (g/gal)

	Quantity	Engine Tier	Tier Distribution	PM10	HC	NOx	CO
4 SW 1500s	4	Tier 0	57%	4.864	7.296	130.72	19.456
3 Brookville Genset locomotives Tier IV	3	Tier 4	43%	0.416	0.832	20.8	26.624

Notes:
1. CCT Switchers.pdf. Switching operations provided by Central California Traction Company (CCT).
CCT operates 7 locomotives (4 SW 1500s and 3 Brookville Genset locomotives Tier IV), per CCT website: https://www.cctrailroad.com/about-us/. Last accessed on 3/5/2020.

Switchers Project Emission Factors (g/gal)

	PM10	PM2.5	HC	NOx	CO	CO2	CH4	N2O
All Years	2.96	2.72	4.53	83.61	22.53	10210	1	0

Notes:
Conservatively assumes no change in switcher fleet in future years.

Table E.25.

Switcher Emission Factors (g/bhp-hr)

	PM10	HC	NOx	CO
Pre-Tier	0.32	0.48	13	1.28
Tier 0	0.32	0.48	8.6	1.28
Tier 0+	0.2	0.3	7.2	1.28
Tier 1	0.32	0.47	6.7	1.28
Tier 1+	0.2	0.29	6.7	1.28
Tier 2	0.18	0.26	4.95	1.28
Tier 2+	0.08	0.13	4.95	1.28
Tier 3	0.08	0.13	4.95	1.28
Tier 4	0.02	0.04	1	1.28

Switcher Emission Factors (g/gal)

	PM10	HC	NOx	CO
Pre-Tier	4.864	7.296	197.6	19.456
Tier 0	4.864	7.296	130.72	19.456
Tier 0+	3.64	5.46	131.04	23.296
Tier 1	5.824	8.554	121.94	23.296
Tier 1+	3.64	5.278	121.94	23.296
Tier 2	3.744	5.408	102.96	26.624
Tier 2+	1.664	2.704	102.96	26.624
Tier 3	1.664	2.704	102.96	26.624
Tier 4	0.416	0.832	20.8	26.624

Source:
CARB. 2017 Short Line / Class III Documentation, Table 5.1. https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road. Last accessed 3/5/2020.

Table E.26.
Switcher Conversion Factors (bhp-hr/gal)

Pre-Tier, Tier 0	15.2
Tier 0+, Tier 1, Tier 1+	18.2
Tier 2, Tier 2+, Tier 3, Tier 4	20.8

Source:
CARB. 2017 Short Line / Class III Documentation, Table 5.2. https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road. Last accessed 3/5/2020.

Table E.27.
Power Distribution in Switcher Mode

Notch Position	Number Locomotives	Power (hp)[2][3][4]	Idle	DB	1	2	3	4	5	6	7	8	Composite Power (hp)	Composite Fuel Use (gal/hr)	Composite Fuel Use (gal/hr))
Time in Notch[1]			44.2%	0.0%	5.0%	25.0%	2.3%	21.5%	1.5%	0.6%	0.0%	0.0%			
EPA Power in Notch for an EPA-tested 1500 hp locomotive[2]			15	70	72	233	440	569	885	1109	1372	1586			
Load in Notch for and EPA-tested 1500 hp locomotive[2]		1500	1.0%	4.7%	4.8%	15.5%	29.3%	37.9%	59.0%	73.9%	91.5%	105.7%			
Work Done at Notch Setting Under the Indicated Duty Cycle (bhp-hr/hr)															
CCT Switcher Locomotive SW	4	1500	7	0	4	58	10	122	13	7	0	0	221	14.5	
CCT Switcher Locomotive Brookville Genset Tier IV[4]	3	1200	5	0	3	47	8	98	11	5	0	0	177	8.5	
Composite Fuel Use for CCT Switchers															11.9

Notes:
1. Time in notch based on CARB's Toxic Air Contaminant Emissions Inventory and Air Dispersion Modeling Report for the Stockton Rail Yard, California. January 2007.
https://ww2.arb.ca.gov/resources/documents/railyard-health-risk-assessments-and-mitigation-measures. Last accessed 3/5/2020.
2. USEPA Office of Mobile Sources, Locomotive Emission Standards Regulatory Support Document, Appendix B. April 1998. EPA-420-R-98-101.
3. Power rating from SW1500 Locomotives.pdf. https://www.brookvillecorp.com/BROOKVILLE-Ships-CoGens-to-CCT-04.10.2015.asp?news=News-Corporate.asp. Last accessed 3/5/2020.
4. Power rating from BrookvilleTier-4_CCTp.df. http://www.gats.com/wps/wcm/connect/GATX/GATX_SITE/Home/Rail+North+America/Products/Equipment+Types/Locomotives/SW1500/. Last accessed 3/5/2020.

Table E.28.
Product Handling Dust Emissions

	Activity (ton/yr)	Activity (ton/day)	Emission Factor (lb/ton)	Annual Emissions (ton/yr)		Average Day Emissions (lb/day)	
			PM	PM10	PM2.5	PM10	PM2.5
Year 2020	96,000	263	0.0025	0.12	0.12	0.66	0.66

Notes:
Emission factors are from AP42, Chapter 9.9.1 Grain Elevators & Processes, Grain Processing Facilities, Table 9.9.1-2.

Table E.29.
Onsite Mobile Source Emissions

		Activity		Fuel Use	Power Rating		Exhaust Emission Factors (g/hp-hr) - Loaded						(kg/gal)				Exhaust Emissions (ton/yr)							(mton/yr)			
Year	**Equipment**	**Number**	**(hr/yr)**	**(gal/yr)**	**Tier**	**(hp)**	**PM10**	**PM2.5**	**DPM**	**NOX**	**SOX**	**CO**	**VOC**	**CO2**	**CH4**	**N2O**	**PM10**	**PM2.5**	**DPM**	**NOX**	**SOX**	**CO**	**VOC**	**CO2**	**CH4**	**N2O**	**CO2e**
2020																											
	Stacker	1	660	1,192	Tier 3	84.5	0.0776	0.0714	0.0776	1.2236	0.0020	1.4663	0.0914	218.1713	0.001	0.000	0.005	0.004	0.005	0.075	0.000	0.090	0.006	12.167	0.00	0.00	12.28
	Small Front End Loader	2	1,200	3,328	Tier 4	73	0.0304	0.0280	0.0304	0.9551	0.0018	1.3081	0.0756	193.8796	0.001	0.000	0.003	0.003	0.003	0.092	0.000	0.126	0.007	16.984	0.00	0.00	17.29
	Large Front End Loader	1	1,440	5,273	Tier 4	192	0.0039	0.0036	0.0039	0.5140	0.0018	0.3959	0.0597	194.6645	0.001	0.000	0.001	0.001	0.001	0.157	0.001	0.121	0.018	53.821	0.00	0.00	54.30
	Skid Steer Loader	1	120	158	Tier 3	69	0.0679	0.0625	0.0679	1.0485	0.0018	1.2248	0.0624	192.3039	0.001	0.000	0.001	0.001	0.001	0.010	0.000	0.011	0.001	1.592	0.00	0.00	1.61
Total 2020																	**0.01**	**0.01**	**0.01**	**0.33**	**0.00**	**0.35**	**0.03**	**84.56**	**0.01**	**0.00**	**85.47**

Source:
Activity provided in E-mail from Lena Desantis to Lora Granovsky, on March 4, 2020 and on March 6, 2020.
Exhaust emission factors were obtained from CARB's OFFROAD2017.
CH4 and N2O emission factors were obtained from 2019 Climate Registry Default Emission Factors, Table 13.7, Default CH4 and N2O Emission Factors for Non-Highway Vehicles.

Table E.30.
GHG Emission Factors for Onsite Mobile Equipment

	CO2 (kg CO2/gal fuel)	CH4 (kg CH4/gal fuel)	N2O (kg N2O/gal fuel)	Fuel
offroad construction equipment[1],[2]	10.21	0.000576	0.000256	diesel

Source:
[1] CO2 emission factors: 2019 Climate Registry Default Emission Factors, Table 13.1, US Default CO2 Emission Factors for Transport Fuels

[2] N2O and CH4 emission factors: 2019 Climate Registry Default Emission Factors, Table 13.7, Default CH4 and N2O Emission Factors for Non-Highway Vehicles.

Table E.31.
OFFROAD2017 Output
OFFROAD2017 (v1.0.1) Emissions Inventory
Region Type: Air Basin
Region: San Joaquin Valley
Calendar Year: 2020
Scenario: All Adopted Rules - Exhaust
Vehicle Classification: OFFROAD2017 Equipment Types
Units: Emissions: tons/day, Fuel Consumption: gallons/year, Activity: hours/year, HP-Hours: HP-hours/year

Region	CalYr	VehClass	MdlYr	HP_Bin	Fuel	HC_tpd	ROG_tpd	TOG_tpd	CO_tpd	NOx_tpd	CO2_tpd	PM10_tpd	PM2_5_tpd	PM_tpd	SOx_tpd	NH3_tpd	Fuel_gpy	Total_Activity_hpy	Total_Population	Horsepower_Hours_hhpy
San Joaquin Valley	2020	ConstMin - Skid Steer Loaders	2008	100	Diesel	0.00016	0.00019	0.00023169	0.00382	0.00327	0.60012	0.000212	0.0002	0.000212	5.54359E-06	4.9E-06	19470.3	13561.1	39.958	1033332
San Joaquin Valley	2020	ConstMin - Skid Steer Loaders	2012	75	Diesel	0.00021	0.00026	0.00030916	0.00611	0.00463	0.97816	0.0001313	0.00012	0.0001313	9.03714E-06	8E-06	31735.4	23595.4	78.0132	1665491
San Joaquin Valley	2020	ConstMin - Skid Steer Loaders	2012	300	Diesel	8.7E-07	1.1E-06	1.2563E-06	9.5E-06	1.3E-05	0.00507	9.122E-08	8.4E-08	9.1216E-08	4.68401E-08	4.1E-08	164.461	43.1554	0.31713	8631.09
San Joaquin Valley	2020	ConstMin - Tractors/Loaders/Backhoes	2008	100	Diesel	0.00297	0.0036	0.00428056	0.05044	0.04124	7.17968	0.0026048	0.0024	0.0026048	6.62905E-05	5.9E-05	232937	137408	227.7	1.2E+07
San Joaquin Valley	2020	ConstMin - Tractors/Loaders/Backhoes	2008	300	Diesel	0.00032	0.00039	0.00046728	0.00166	0.00381	0.78376	0.0001767	0.00016	0.0001767	7.23649E-06	6.4E-06	25428.1	6546.85	9.35752	1337958
San Joaquin Valley	2020	ConstMin - Tractors/Loaders/Backhoes	2012	100	Diesel	0.00127	0.00153	0.00182231	0.02651	0.01936	3.92909	0.0006163	0.00057	0.00061633	3.62884E-05	3.2E-05	127475	80083.7	139.739	6710405
San Joaquin Valley	2020	ConstMin - Tractors/Loaders/Backhoes	2012	300	Diesel	0.0001	0.00012	0.00014592	0.00081	0.00106	0.39991	7.984E-06	7.3E-06	7.9843E-06	3.69432E-06	3.3E-06	12974.6	3316.05	6.86218	680242
San Joaquin Valley	2020	ConstMin - Other Construction Equipment	2008	100	Diesel	0.00011	0.00013	0.00015813	0.00213	0.00178	0.31717	0.0001128	0.0001	0.00011283	2.92911E-06	2.6E-06	10290.3	5982.41	13.0561	481376

Table E.32.
Global Warming Potentials (GWP)

CO2	CH4	N2O
1	21	310

Source: The Climate Registry, General Protocols, v. 2.0, Table B.2. March 2013.