SAN JOAQUIN COUNTY

Public Review Draft Initial Study/ Mitigated Negative Declaration

S-Line Transport - General Plan Text Amendment No. PA-2600033, General Plan Map Amendment and Zone Reclassification No. PA-26000034, and Administrative Use Permit No. PA-2600035

prepared by
San Joaquin County
Community Development Department
1810 Hazelton Avenue
Stockton, CA 95205

prepared with the assistance of
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J.B. ANDERSON
LAND USE PLANNING

October 2026

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TABLE OF CONTENTS

	Page
NEGATIVE DECLARATION	**3**
INITIAL STUDY	**11**
1. Project Title	11
2. Lead Agency Name and Address	11
3. Contact Person and Phone Number	11
4. Project Location	11
5. Project Sponsor's Name and Address	11
6. Existing Setting	12
7. Existing General Plan Designation	14
8. Existing Zoning	14
9. Surrounding Land Uses and Setting	14
10. Description of the Project	15
11. Other Public Agencies Whose Approval is Required	16
12. California Native American Tribes Consultation	17
13. Environmental Factors Potentially Affected	20
14. Lead Agency Determination	21
INITIAL STUDY CHECKLIST	**24**
1. Aesthetics	24
2. Agriculture and Forestry Resources	27
3. Air Quality	31
4. Biological Resources	36
5. Cultural Resources	40
6. Energy	42
7. Geology and Soils	43
8. Greenhouse Gas Emissions	47
9. Hazards and Hazardous Materials	52
10. Hydrology and Water Quality	56
11. Land Use and Planning	59
12. Mineral Resources	61
13. Noise	62
14. Population and Housing	65
15. Public Services	66
16. Recreation	68
17. Transportation/Traffic	69
18. Tribal Cultural Resources	72
19. Utilities and Service Systems	75
20. Wildfire	78
21. Mandatory Findings of Significance	80
REFERENCES	**83**

FIGURES

1. Location Map 4
2. Proposed General Plan Amendment 6
3. Proposed Rezone 7
4. Site Photos 12
5. Site Plan 19
6. Farmland Mapping and Monitoring Program Map 28

TABLES

1. Surrounding Land Uses and Setting 14
2. SJVAPCD Air Quality Significance Thresholds for Construction and Operational Emissions 33
3. SJVAPCD Significance Thresholds and Proposed Project Emissions 33

APPENDICES 84

Appendix A – Air Impact Assessment Approval, dated March 14, 2025, as Issued by the San Joaquin Valley Air Pollution Control District

Appendix B - Health Risk and Ambient Air Quality Assessment, dated August 29, 2024, prepared by JK Consulting Group, LLC

MITIGATED NEGATIVE DECLARATION

Lead Agency:
San Joaquin County
1810 Hazelton Avenue
Stockton, CA 95205

PROJECT NAME: S-Line Transport - General Plan Text Amendment No. PA-2600033, General Plan Map Amendment and Zone Reclassification No. PA-2600034, and Administrative Use Permit No. PA-2600035

PROJECT PROPONENT AND LEAD AGENCY:

Project Proponent: S-Line Transportation
890 Bridgeway Circle
El Sobrante, CA 94803

Lead Agency: San Joaquin County
Community Development Department
1810 Hazelton Avenue
Stockton, CA 95205

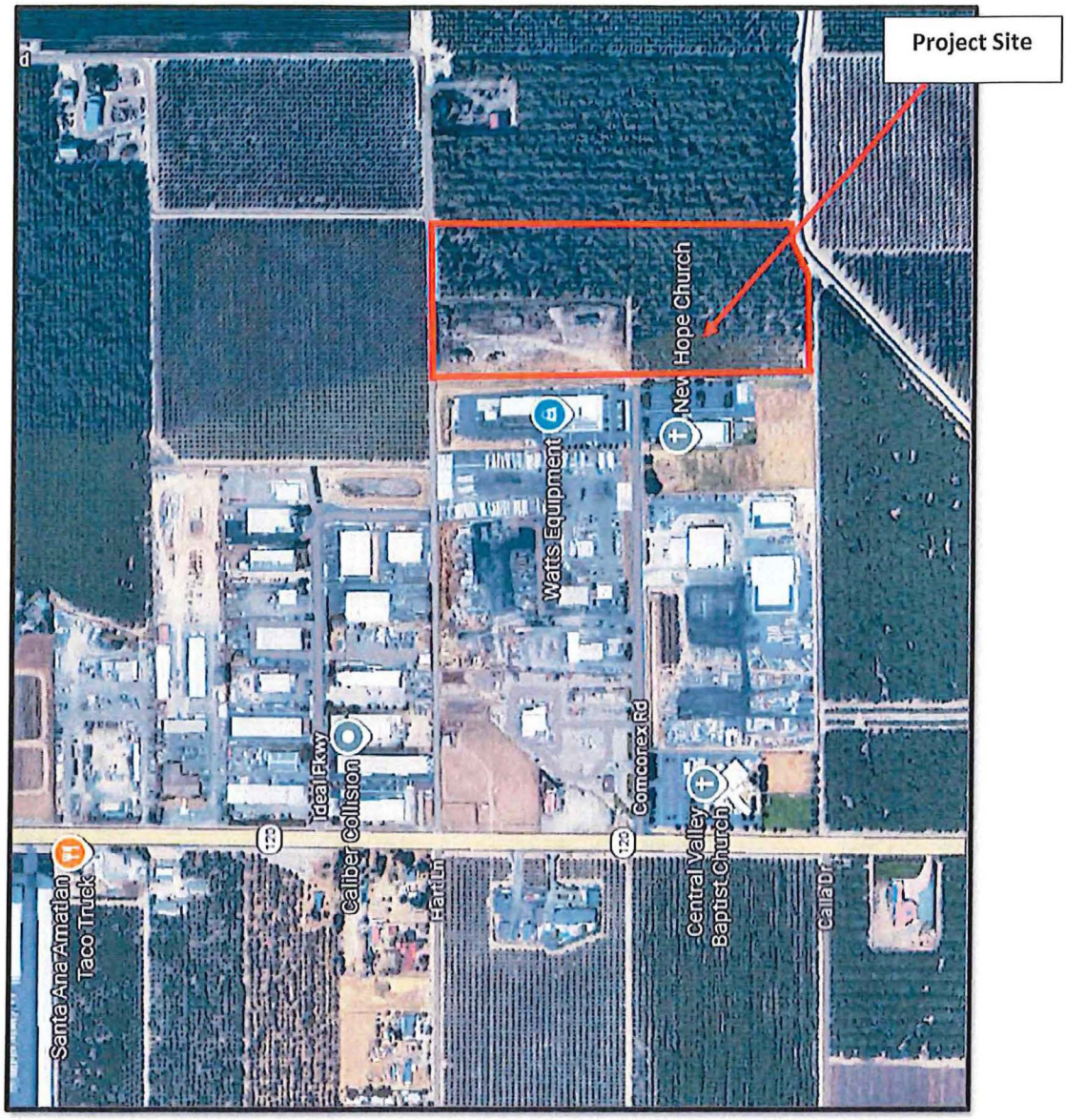
PROJECT LOCATION:

The Project site is approximately 16.52-acres in size. However, only a 4.02-acre portion of the Project site is currently proposed for development and is the primary focus of this Initial Study.

The Project site is located just east of the Manteca City limits, near East State Route 120. Specifically, the Project site is located at the northern terminus of S. Comconex Road, approximately 1,500 feet north of East State Route 120. The Assessor Parcel Number assigned to the Project site is 208-180-02 and the property address is 11537 E. State Route 120, Manteca, CA 95336.

Figure 1, Location Map, provides an illustration of the Project site's location.

Figure 1 – Location Map



PROJECT DESCRIPTION:

The proposed Project includes a General Plan Text Amendment, General Plan Map Amendment and Zone Reclassification, and an Administrative Use Permit with Zoning Administrator Determination request to allow for the development of a 16.52-acres site located east of the Manteca city limits. Below is a brief description of each of the entitlements being requested along with a brief summary of the proposed Project development and operations:

General Plan Text Amendment:

The proposed General Plan Text Amendment would amend the road classification requirements for the Warehouse Industrial designation to allow development to be served by an existing roadway constructed to industrial road standards that is within one-half mile of a County-defined Major Collector or higher classification roadway or a highway frontage road. Specifically, the Applicant is requesting the following text amendment (Note: underlined text represents the requested changes. All other language is existing).

Proposed Text: "This designation provides for wholesale distribution, warehouses, and services establishments catering to those uses that produce minimal industrial waste and have limited water demand. The Warehouse Industrial designation is typically applied to locations within or adjacent to utility special districts, or within two miles of Urban Communities. Developments must be located on a County defined Major Collector or higher classification roadway, along a highway frontage road, or served by an existing roadway constructed to industrial road standards that is within one-half mile of such roads.

General Plan Map Amendment and Zone Reclassification:

The proposed General Plan Map Amendment and Zone reclassification would modify the land use designation and zone classification for a portion of the Project site. Currently, the 16.52-acre Project site is designated for A/G (General Agriculture) and OS/RC (Resource Conservation) land uses per the County's General Plan, and it is located within the AG-40 (General Agriculture, 40-acre minimum) zone district. The proposed Project would amend the County's General Plan land use designation for the A/G portion of the Project site to be designated I/W (Warehouse Industrial) and the entire parcel to be zoned I-W (Warehouse Industrial). Refer to Figures 2 (Proposed General Plan Amendment) and 3 (Proposed Rezone).

Figure 2 – Proposed General Plan Amendment

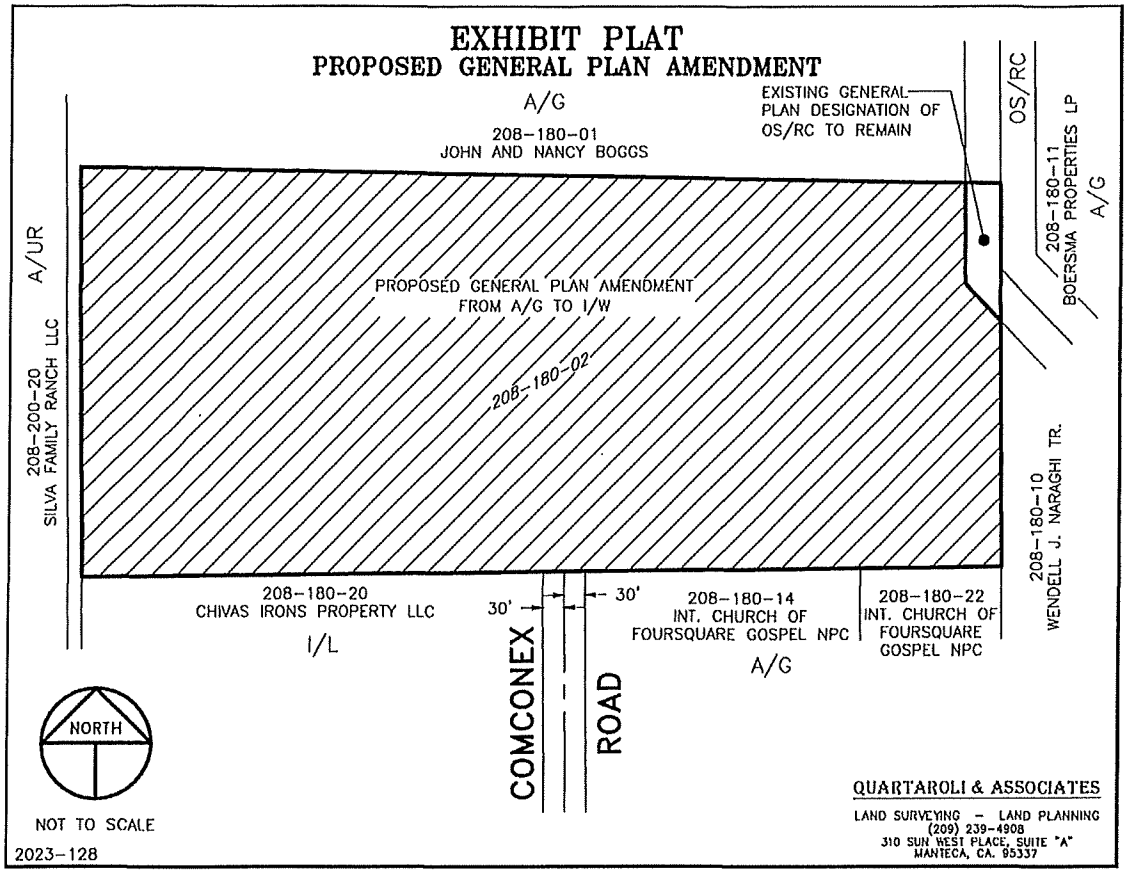
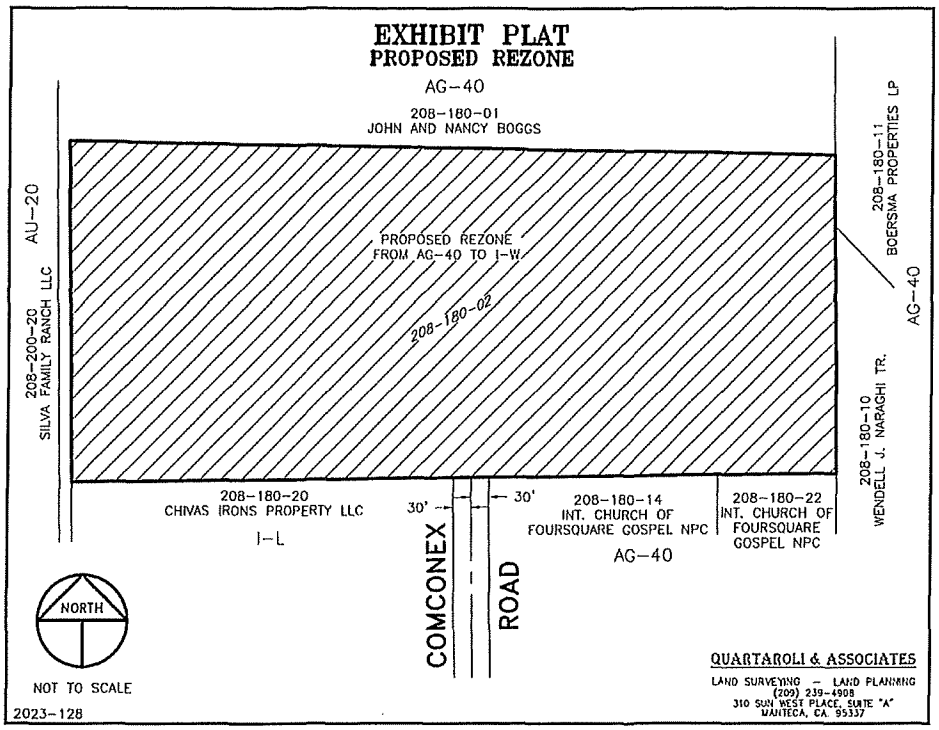


Figure 3 – Proposed Rezone



Administrative Use Permit:

The proposed Project includes an Administrative Use Permit to allow for the development of an office, truck repair shop, parts storage building, twenty-six (26) truck and trailer parking stalls, five (5) truck and trailer repair staging stalls, and nine (9) automobile stalls to allow for the operation of the S-Line Transport trucking company. Specific sizes proposed for the office, truck repair shop, and parts storage area are as follows:

Building	Size (square feet)
Office	625
Truck Repair Shop	3,750
Parts Storage	625
Total	**5,000**

The Project site is located approximately 1,516 feet north of State Route 120 (SR-120). Primary access to and from the Project site will be provided via Comconex Road, which abuts the Project site to the south and is developed to industrial road standards. Vehicles will enter the Project site from Comconex Road via a private industrial driveway installed as part of the proposed Project.

The proposed Project will be served by private utilities, which include the drilling of a new water well and installation of a fire suppression tank and a private wastewater septic system. Development also includes the installation of a storm drain basin located along the Project site's southern and western edge. Other improvements include landscaping on each side of the entry roadway into the Project site. Perimeter fencing will include a combination of new and existing chain link fencing.

Zoning Administrator Determination:

The Administrative Use Permit includes a Zoning Administrator Determination request for modifications to the County's Development Title to accommodate the proposed Project, if approved. Specifically, the Applicant is requesting the following:

Development Title Section 9-406.080(g)(i) – request to modify the Truck Parking Space Dimension requirement from fifteen (15) feet in width to twelve (12) feet in width.

Development Title Section 9-402.050(a)(4) – request to modify the landscaping requirement of one (1) tree per every 5,000 square feet of industrial development) and determine that the existing almond orchard located on an approximately 11.38-acre portion of the 16.52-acre site be considered to comply with this requirement.

Development Title Section 9-400.040(d)(3)(A)(i) – request to modify the screening requirement from six to eight feet in height of screening along the property line abutting a residential use to allow the existing almond orchard to serve as the screening required per Development Title Section 9-400.040(d)(3)(A)(i). The almond orchard will remain upon development of the remainder of the Project site. If in the event the existing almond orchard is removed, the applicant acknowledges that the requirements of this section of the Development Title shall apply.

Figure 5 provides the proposed Project's Site Plan (refer to page 18).

ENVIRONMENTAL DETERMINATION:

The Lead Agency has prepared an Initial Study that evaluates the potential environmental effects of the proposed Project. Based on this analysis, the Lead Agency has determined that preparation of a Mitigated Negative Declaration is necessary. The Initial Study further concludes that, in light of the whole record before the Lead Agency, there is no substantial evidence that the Proposed Project, as mitigated, may have a potentially significant effect on the environment.

MITIGATION MEASURES:

The following Mitigation Measures shall be incorporated into the proposed Project:

AG-1: The proposed Project shall comply with Chapter 9-701, Agricultural Mitigation, of the County's Development Title to mitigate the conversion of agricultural land. Mitigation shall be provided at a minimum 1:1 ratio. Pursuant to Section 9-701.040 (d) and (e), mitigation shall be accomplished through one (1) of the following methods, subject to County approval:

a. Conservation Easement; or
b. In-Lieu Fee.

AIR-1: For each Project phase, all records shall be maintained on site during construction and for a period of ten (10) years following either the end of construction or the issuance of the first certificate of occupancy, whichever is later. Records shall be made available for District inspection upon request.

AIR-2: For each Project phase, maintain records of (1) the construction start and end dates and (2) the date of issuance of the first certificate of occupancy, if applicable.

AIR-3: For each Project phase, within thirty (30) days of issuance of the first certificate of occupancy, if applicable, submit to the District a summary report of the construction start and end dates, and the date of issuance of the first certificate of occupancy. Otherwise, submit to the District a summary report of the construction start and end dates within 30-days of the end of each phase of construction.

BIO-1: The Project shall participate in and obtain coverage under the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Prior to ground disturbance, the Project applicant shall mitigate for the proportionate loss of potential wildlife habitat from the Project site by implementing any Incidental Take Minimization Measures (ITMMs) prescribed by the San Joaquin Council of Governments (SJCOG). A biologist representing SJCOG shall visit the project site prior to the issuance of ITMMs to the City and to the project applicant.

CUL-1: In accordance with Section 15064.4(e) of the CEQA Guidelines, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

- There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until:
  - The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required;
  - If the coroner determines the remains to be Native American:
    - The coroner shall contact the Native American Heritage Commission within 24 hours.
    - The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
    - The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.

Megan Aguirre

Ms. Megan Aguirre, Principal Planner

10/14/2026

Date

INITIAL STUDY

1. PROJECT TITLE

S-Line Transport - General Plan Text Amendment No. PA-2600033, General Plan Map Amendment and Zone Reclassification No. PA-2600034, and Administrative Use Permit No. PA-2600035

2. LEAD AGENCY NAME AND ADDRESS

San Joaquin County
Community Development Department
1810 Hazelton Avenue
Stockton, CA 95205

3. CONTACT PERSON AND PHONE NUMBER

Ms. Megan Aguirre, Principal Planner
Email: meaguirre@sjgov.org
Phone: 209-468-3144

4. PROJECT LOCATION

The Project site is located just east of the Manteca City limits, near East State Route 120. Specifically, the Project site is located at the northern terminus of S. Comconex Road, approximately 1,500 feet north of East State Route 120. The Assessor Parcel Number assigned to the Project site is 208-150-02 and the property address is 11537 E. State Route 120, Manteca, CA 95336.

Figure 1 provides an illustration of the Project site's location (refer to page 17).

5. PROJECT SPONSOR'S NAME AND ADDRESS

S-Line Transport
890 Bridge Way Circle
El Sobrante, CA 94803

6. EXISTING SETTING

The Project site is relatively flat, with little or no slope. While the Project site has been historically utilized for agricultural purposes, the site to be developed is now fallow. While there are no existing agricultural operations on the portion of the site to be developed, the majority of the Project site consists of an existing almond orchard. An irrigation canal is located in the northeast corner of the Project site. Existing access to the Project is provided via Comconex Road.

Figure 4 provides photo illustrations of the Project site.

Figure 4 – Site Photos

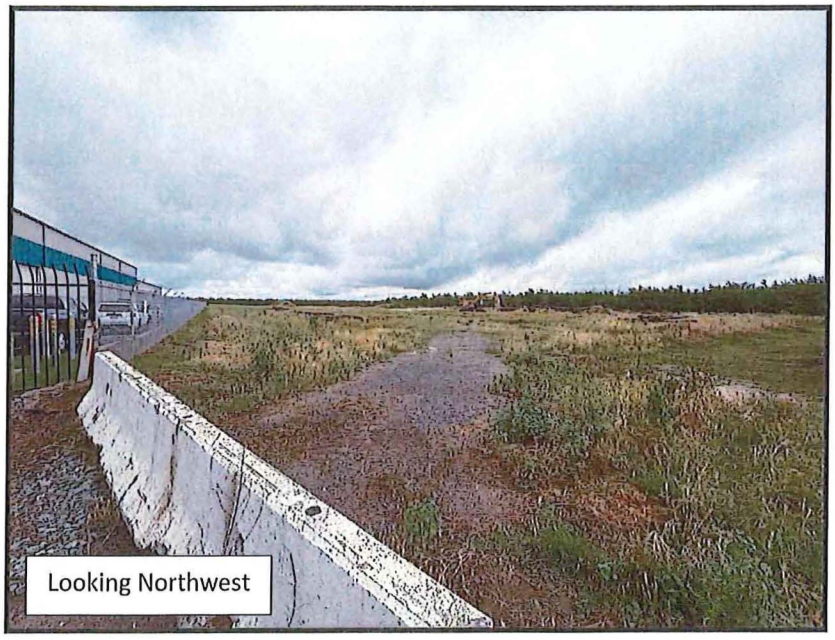




Figure 4 – Continued





7. Existing General Plan Designation

The Project site is designated for A/G (General Agriculture) and OS/RC (Resource Conservation) by the County's General Plan, dated December 2016. The proposed Project includes a General Plan Map Amendment to designate the Project site for I/W (Warehouse Industrial) land uses.

8. Existing Zoning

The project site is located within the AG-40 (General Agriculture, 40-acre minimum) zone district. The proposed Project includes a zone reclassification from AG-40 to I-W (Warehouse Industrial)

9. Surrounding Land Uses and Setting

The table below depicts the proposed Project's surrounding land uses and setting.

Table 1 – Surrounding Land Uses and Setting

	Existing Use	General Plan Land Use Designation	Zoning Classification
North	Almond Orchard	General Agriculture	AG-40
South	Industrial uses	Limited Industrial and General Agriculture	I-L, AG-40
East	Almond Orchard	General Agriculture	AG-40
West	Almond Orchard	General Agriculture	AG-40, AU-20

10. DESCRIPTION OF THE PROJECT

The proposed Project includes a General Plan Text Amendment, Zoning Administrator Determination, General Plan Map Amendment and Zone Reclassification, and an Administrative Use Permit to allow for the development of a 16.52-acres site located east of the Manteca city limits. Below is a brief description of each of the entitlements being requested along with a brief summary of the Proposed Project development and operations:

General Plan Text Amendment:

The proposed Project includes a General Plan Text Amendment to allow for the road classification requirements for the Warehouse Industrial designation to be amended by allowing development to be served by an existing roadway constructed to industrial road standards that is within one-half mile of a County-defined Major Collector or higher classification roadway or a highway frontage road. Specifically, the Applicant is requesting the following text amendment (Note: underlined text represents the requested text amendment).

Proposed Text: "This designation provides for wholesale distribution, warehouses, and services establishments catering to those uses that produce minimal industrial waste and have limited water demand. The Warehouse Industrial designation is typically applied to locations within or adjacent to utility special districts, or within two miles of Urban Communities. Developments must be located on a County defined Major Collector or higher classification roadway, along a highway frontage road, or served by an existing roadway constructed to industrial road standards that is within one-half mile of such roads."

General Plan Map Amendment and Zone Reclassification:

The proposed General Plan Map Amendment and Zone reclassification proposes to modify the land use designation and zone classification for the Project site. Currently, the 16.52-acre Project site is designated for A/G land uses per the County's General Plan, and it is located within the AG-40 zone district. The proposed Project will amend the County's General Plan land use designation for the A/G portion of the Project site to be designated for I/W (Warehouse Industrial) land uses and the entire parcel to be zoned I-W (Warehouse Industrial).

Administrative Use Permit:

The proposed Project includes an Administrative Use Permit to allow for the development of an office, truck repair shop, parts storage, twenty-six (26) truck parking stalls, five (5) truck and trailer repair staging stalls, and nine (9) automobile stalls on a 4.02-acre portion of the Project site to allow for the operation of the S-Line Transport trucking company. Specific sizes proposed for the office, truck repair shop, and parts storage area are as follows:

Building	Size (square feet)
Office	625
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Total	**5,000**

The Project site is located approximately 1,516 feet north of State Route 120 (SR-120). Primary access to and from the Project site will be provided via Comconex Road, which abuts the Project site to the south and is developed to industrial road standards. Vehicles will enter the Project site from Comconex Road via a private industrial driveway installed as part of the proposed Project.

The proposed Project will be served by private utilities, which include the drilling of a new water well and installation of a fire suppression tank and a private wastewater septic system. Development also includes the installation of a storm drain basin located along the Project site's southern and western edge. Other improvements include landscaping on each side of the entry roadway into the Project site. Perimeter fencing will include chain link fencing.

Zoning Administrator Determination:

The Administrative Use Permit includes a Zoning Administrator Determination request for modifications to the County's Development Title to accommodate the proposed Project, if approved. Specifically, the Applicant is requesting the following:

Development Title Section 9-406.080(g)(i) – request to modify the Truck Parking Space Dimension requirement from fifteen (15) feet in width to twelve (12) feet in width.

Development Title Section 9-402.050(a)(4) – request to modify the landscaping requirement (1 tree per every 5,000 square feet of industrial development) and determine that the existing almond orchard located on an X-acre portion of the 16.52-acre site be considered to comply with this requirement.

Development Title Section 9-400.040(d)(3)(A)(i) – request to modify the screening requirement from six to eight feet in height of screening along the property line abutting a residential use to allow the existing almond orchard to serve as the screening required per Development Title Section 9-400.040(d)(3)(A)(i). If in the event the existing almond orchard is removed, the applicant acknowledges that the requirements of this section of the Development Title shall apply.

Figure 5 provides the proposed Project's Site Plan (refer to page 18).

11. Other Public Agencies Whose Approval is Required

There are no other public agencies whose approval is required for the proposed Project.

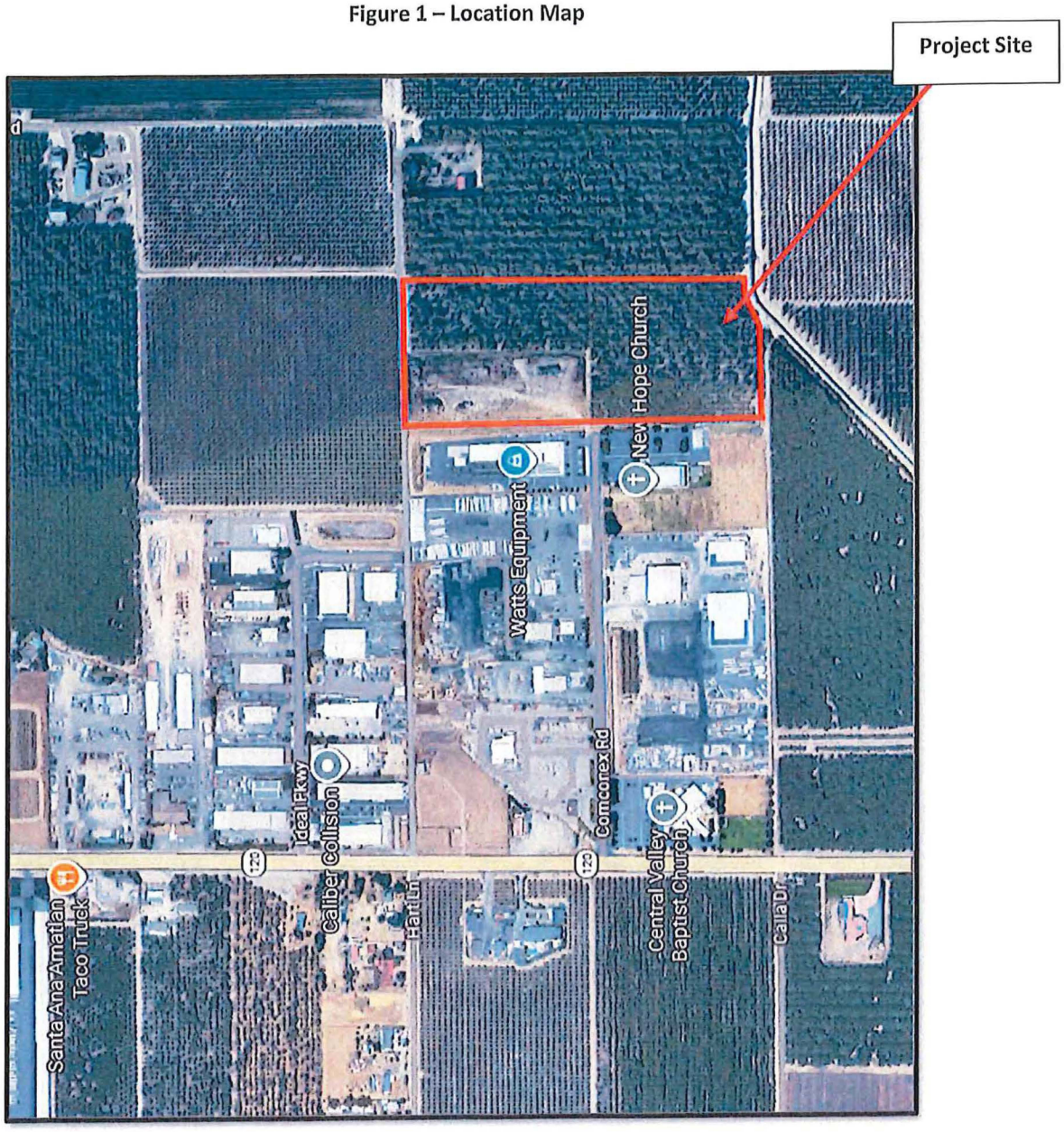
12. Have California Native American tribes traditionally and culturally affiliated the project area requested consultation pursuant to Public Resources Code Section 21080.3.1?

The California Native American Heritage Commission (NAHC) was consulted, and the following Tribes were notified of the proposed Project; none have requested consultation:

- Buena Vista Rancheria
- California Valley Miwok Tribe
- United Auburn Indian Community
- North Valley Yokuts Tribe

The County received a written response, dated June 11, 2026, from the California Valley Miwok Tribe indicating that the California Valley Miwok Tribe did not have a comment or concern regarding the proposed Project.

Figure 1 – Location Map



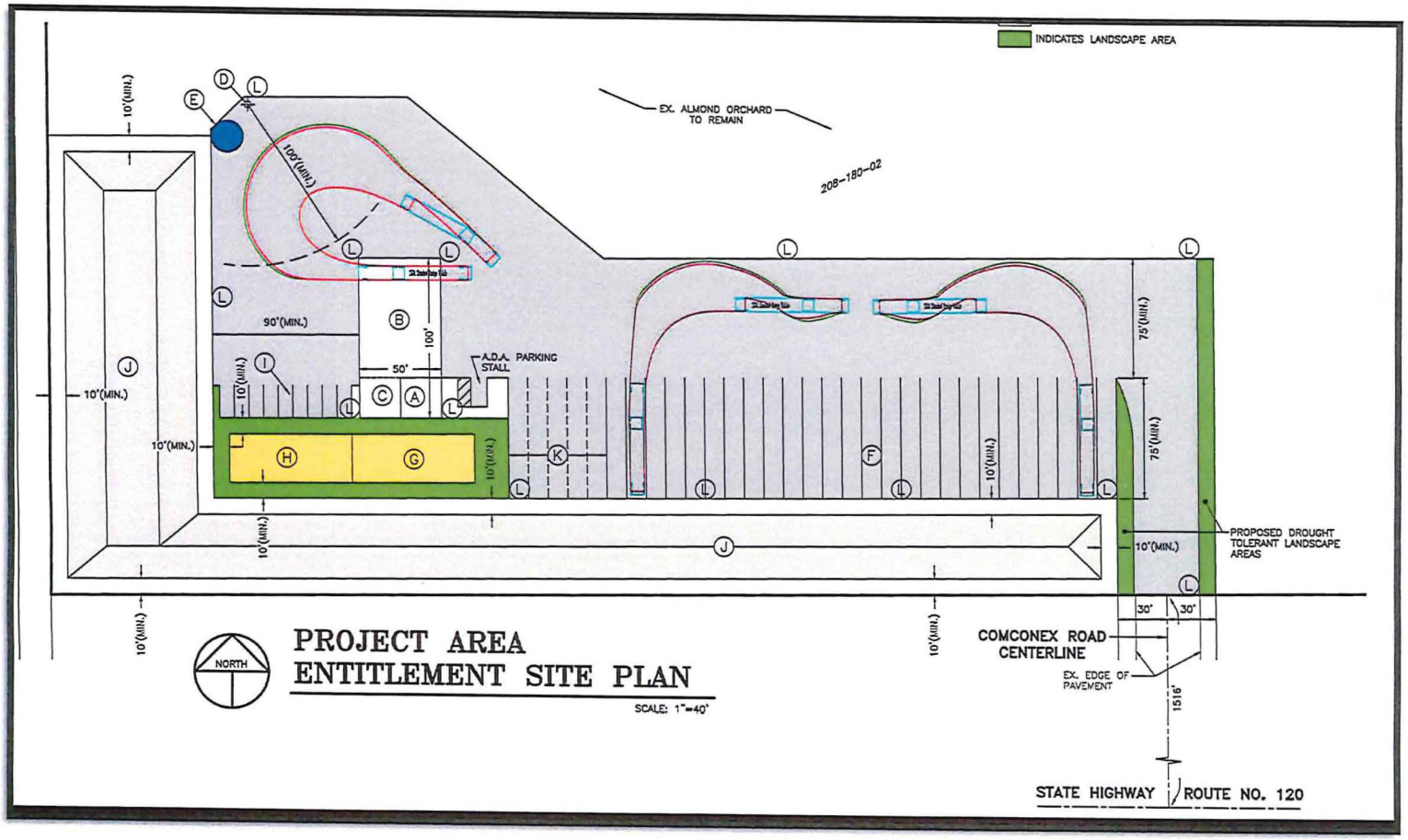


Figure 5 – Site Plan

13. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology and Soils		Greenhouse Gas Emissions Materials		Hazards and Hazardous
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public Services
	Recreation		Transportation/Traffic		Utilities and Service Systems
	Wildfire		Mandatory Findings of Significance		

14. LEAD AGENCY DETERMINATION:

On the basis of this initial evaluation:

	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
X	I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the Project Proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Ms. Megan Aguirre, Principal Planner	**Date**

SECTION 2.0 EVALUATION INSTRUCTIONS:

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

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

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

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

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used: This Initial Study, where feasible, tiers from the County's 2035 General Plan Environmental Impact Report.

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

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

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

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

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

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form, contained in the CEQA Guidelines.

1. AESTHETICS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

IMPACT ANALYSIS

a. *Would the project have a substantial adverse effect on a scenic vista?*

Based on a review of the San Joaquin County 2035 General Plan Draft Environmental Impact Report (DEIR), major scenic vistas are provided by the east-west travel corridors that provide views of the Sierra Nevada foothills and/or views of the Diablo Range. Other scenic vistas include major river corridors and lands under agricultural production. The Project site is located north of State Route 120. Per the 2035 General Plan, portions of State Route 120 could be considered scenic vistas as it provides views of the Sierra Nevada foothills or Diablo Range. However, the proposed Project, being that it is not located on or immediately adjacent to State Route 120, would not impact any scenic vistas in the surrounding areas. Furthermore, the Project site is surrounded by existing industrial development to the south, along with a religious facility to the southeast, and is not located in an area known for containing scenic vistas. Therefore, the proposed Project will have a **Less Than Significant Impact.**

b. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a state scenic highway?*

Based on a review of the County's 2035 General Plan DEIR, the Project site is not located on or near a state scenic highway as the portion of State Route 120 near the Project site is not designated as a scenic highway. Therefore, the proposed Project will have a **Less Than Significant Impact.**

c. *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The existing setting of the Project site is raw, undeveloped land and an active agricultural orchard (almonds), with developed industrial properties located to the south and agricultural operations located to the north, east, and west. The portion of the site proposed for development has previously been cleared of trees and is not currently utilized for agricultural production. The proposed Project is considered to be industrial in nature, which represents a logical extension of the existing industrial and commercial development located immediately to the south. Given the previously disturbed condition of the development area and the surrounding land use pattern, the proposed Project would not substantially degrade the existing visual character or quality of the Project site or its surroundings. Therefore, the proposed Project will have a **Less Than Significant Impact.**

d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The proposed Project will create a new source of light with development of the Project site. However, the Project Proponent will be required to adhere to 2035 General Plan Policies NCR-7.7, which reads as follows:

Reducing Glare and Light Pollution. *The County shall encourage project designs, lighting configurations, complementary land uses, and operational practices that reduce the potential for glare during daytime hours and reduce nighttime light pollution to protect adjacent land uses from light and glare and preserve views of the night sky.*

The proposed Project is also subject to Section 9-406.060(m) of the County's Development Title. Exterior lighting shall meet the following minimum standards:

1. The equivalent of one (1) foot candle of illumination shall be provided throughout the parking area.
2. All lighting shall be on a time clock or photo-sensor system so as to be turned off during daylight hours and during any hours when the parking area is not in use. This requirement does not apply to security lighting.

3. All lighting shall be designed to confine direct rays to the premises. No spillover beyond the property line shall be permitted, except onto public roads, provided, however, that such light shall not cause a hazard to motorists.

The proposed Project will be installing site lighting and light fixtures typical of an industrial development and truck parking facility and in compliance with Section 9-406.060(m) of the County's Development Title. This lighting is not anticipated to create substantial light or glare that would adversely affect day and nighttime views, as the Project site is generally surrounded by industrial development to the south. Therefore, the proposed Project will have a **Less Than Significant Impact**.

MITIGATION MEASURES:

Mitigation is not required for this topic.

2. AGRICULTURE AND FORESTRY RESOURCES: WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		X		
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?		X		
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?		X		

IMPACT ANALYSIS

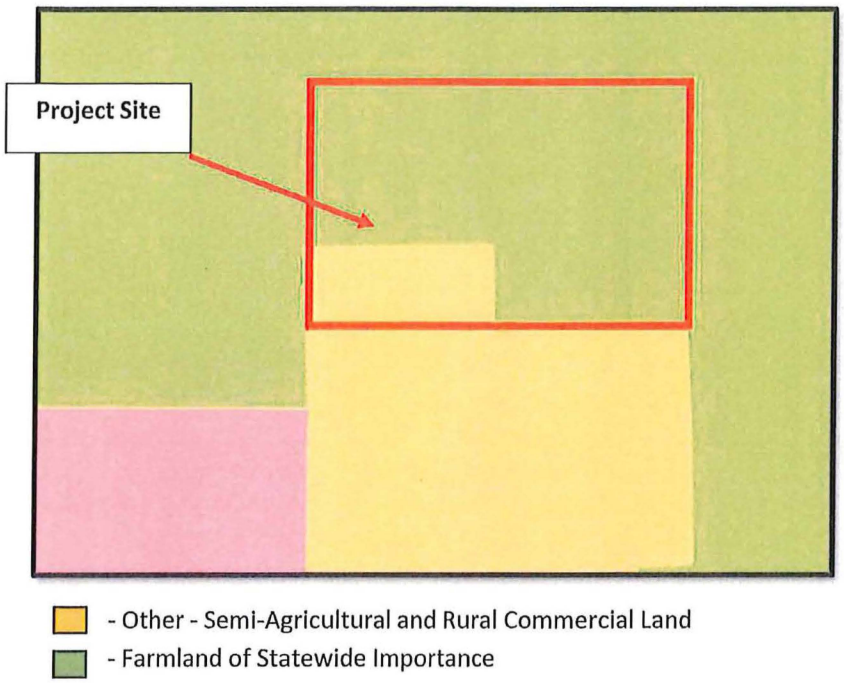
The following discussion is an analysis for criteria (a), (b), (c), (d) and (e):

a. *Would the project convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

b. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

Based on a review of the County's 2035 General Plan DEIR and specifically, Figure 4.B-1, the portion of the Project site proposed for development is considered to be "Other Important Farmland." "Other Important Farmland" is considered to be Farmland of Local Importance (Refer to Page 4.B-3 of 2035 General Plan DEIR). Additionally, according to the California Department of Conservation's Farmland Mapping and Monitoring Program, the remaining approximately 12.5-acres of the Project site is designated as Farmland of Statewide Importance, as illustrated in Figure 6 – Farmland Mapping and Monitoring Program Map.

Figure 6 – Farmland Mapping and Monitoring Program Map



Thus, the proposed Project will convert Other Important Farmland and Farmland of Statewide Importance to a non-agricultural use. However, the Project site does not have an active Williamson Act contract.

In 2006, the County adopted an Agricultural Mitigation Ordinance (Chapter 9-701). Mitigation is required when there is a General Plan Amendment or Zoning Reclassification that changes the permitted uses from agriculture to a non-agricultural use. The proposed Project includes a General Plan Amendment and Zoning Reclassification to allow for the development of industrial uses on a portion of the Project site which will convert agricultural lands to a non-agricultural use. Therefore, the County's Agricultural Mitigation Ordinance is applicable.

The types of mitigation permitted under the County's Ordinance can be satisfied by granting a farmland conservation easement or other farmland conservation measures. The number of acres of land that shall be mitigated shall be at least equal to the number of acres being changed to a non-agricultural use, essentially a 1:1 ratio. The proposed Project will be required to satisfy Chapter 9-701 by mitigating for the loss of 16.52 -acres.

The Applicant and/or Project Proponent shall be required to adhere to Chapter 9-701 of the County Code. Therefore, Mitigation Measure AG-1 has been included as part of this Initial Study.

Based on the analysis above, the proposed Project will have a **Less Than Significant Impact with Mitigation Incorporated**.

c. *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

The Project site is not designated as forest land as defined in Public Resources Code Section 12220(g) or timberland as defined in Public Resources Code Section 4526. Therefore, the proposed Project will have **No Impact**.

d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

Based on a review of the County's 2035 General Plan and General Plan DEIR, the Project site is not considered forest land. Therefore, the proposed Project will have **No Impact**.

e. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

The proposed Project consists of a truck repair and parking facility located on an approximately 16.52-acre parcel currently designated for agricultural land uses pursuant to the County's 2035 General Plan. As noted above, the Project site is classified as Other Important Farmland and Farmland of Statewide Importance. The portion of the Project site, approximately 4.02-acres, proposed for immediate development is currently fallow and has previously been cleared of agricultural trees. The remainder of the Project site, approximately 12.5-acres, is currently planted with almond trees and remains in agricultural production.

Although the proposed Project would result in the immediate physical conversion of approximately 4.02-acres of farmland to a non-agricultural use, the proposed Project also includes a General Plan Amendment and Zoning Reclassification affecting the entire 16.52-acre parcel. As a result, the approximately 12.5-acres that would remain in agricultural production following development of the proposed Project would nevertheless be redesignated and rezoned to allow non-agricultural uses. While no development of this remaining acreage is proposed at this time, the proposed land use designation and zoning changes would facilitate the potential future conversion of this acreage to non-agricultural uses. As such, the analysis considers the potential conversion of the entire 16.52-acre Project site.

The Project site is located immediately north of existing industrial development, and the proposed Project would represent a continuation of the existing industrial development pattern in the area. Access to the Project site would be provided via Comconex Road, an existing roadway that currently terminates at the Project site. Nevertheless, the proposed Project would convert land classified as Other Important Farmland and Farmland of Statewide Importance and would redesignate and rezone the Project site to accommodate non-agricultural uses. Because the proposed Project will convert farmland to a non-agricultural use, Chapter 9-701 of the San Joaquin County Code applies.

Implementation of Mitigation Measure AG-1 would require agricultural mitigation at a minimum 1:1 ratio, based on the acreage converted or otherwise subject to mitigation pursuant to Chapter 9-701, through the permanent protection of qualifying agricultural land or payment of an applicable agricultural mitigation in-lieu fee, as approved by the County. With implementation of Mitigation Measure AG-1, impacts associated with the conversion of agricultural land to non-agricultural use would be reduced. Thus, the proposed Project will have a **Less Than Significant Impact with Mitigation Incorporated**.

MITIGATION MEASURES:

AG-1: The proposed Project shall comply with Chapter 9-701, Agricultural Mitigation, of the County's Development Title to mitigate the conversion of agricultural land. Mitigation shall be provided at a minimum 1:1 ratio. Pursuant to Section 9-701.040 (d) and (e), mitigation shall be accomplished through one (1) of the following methods, subject to County approval:

a. Conservation Easement; or
b. In-Lieu Fee.

3. AIR QUALITY -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

REGULATORY SETTING

The proposed Project is located in San Joaquin County which is a portion of the San Joaquin Valley Air Basin (SJVAB). Air quality management under the Federal and State Clean Air Acts is the responsibility of the San Joaquin Valley Air Pollution Control District (SJVAPCD).

The Federal and State governments have adopted ambient air quality standards (AAQS) for the primary air pollutants of concern, known as "criteria," air pollutants. Air quality is managed by the SJVAPCD to attain these standards. Primary standards are established to protect the public health; secondary standards are established to protect the public welfare. The attainment statuses of the SJVAB for Stanislaus County with respect to the applicable AAQS are shown in the table below.

The SJVAB is considered non-attainment for ozone and particulate matter (PM10 and PM2.5), because the AAQS for the pollutants are sometimes exceeded. The SJVAB is Attainment/Unclassified for carbon monoxide, but select areas, not including the City of Oakdale, are required to abide by adopted carbon monoxide maintenance plans.

The California Air Resources Board (CARB) through the Air Toxics Program is responsible for the identification and control of exposure to air toxics, and notification of people that are subject to significant air toxic exposure. A principal air toxic is diesel particulate matter, which is a component of diesel engine exhaust.

The SJVAPCD has adopted regulations establishing control over air pollutant emissions associated with land development and related activities. These regulations include:

Regulation VIII (Fugitive Dust Rules)
Rule 4101 (Visible Emissions)

SAN JOAQUIN VALLEY FEDERAL AND STATE AAQS ATTAINMENT STATUS

Pollutant	Designation / Classification	
	Federal Standards[a]	**State Standards[b]**
Ozone, 1-hour	No Federal standard[f]	Nonattainment / Severe
Ozone, 8-hour	Nonattainment / Extreme[e]	Nonattainment
PM10	Attainment[c]	Nonattainment
PM2.5	Nonattainment[d]	Nonattainment
Carbon Monoxide	Attainment / Unclassified	Attainment / Unclassified
Nitrogen Dioxide	Attainment / Unclassified	Attainment
Sulfur Dioxide	Attainment / Unclassified	Attainment
Lead (particulate)	No designation/Classification	Attainment
Hydrogen Sulfide	No Federal standard	Unclassified
Sulfates	No Federal standard	Attainment
Visibility-Reducing Particles	No Federal standard	Unclassified
Vinyl Chloride	No Federal standard	Attainment

[a]See 40 CFR Part 81
[b]See CCR Title 17 Sections 60200-60210
[c]On September 25, 2008, EPA redesignated the San Joaquin Valley to Attainment for the PM10 National AAQS and approved the PM10 Maintenance Plan
[d]The Valley is designated nonattainment for the 1997 PM2.5 NAAQS. EPA designated the Valley as nonattainment for the 2006 PM2.5 on November 13, 2009 (effective December 14, 2009).
[e]Though the Valley was initially classified as serious nonattainment for the 1997 8-hour ozone standard, EPA approved reclassification of the Valley to extreme nonattainment in the Federal Register on May 2010 (effective June 4, 2010).
[f]Effective June 15, 2005, the EPA revoked the Federal 1-hour ozone standard, including associated designations and classifications. EPA has previously classified the SJV as extreme nonattainment for this standard. EPA approved the 2004 Extreme Ozone Attainment Demonstration Plan on March 8, 2010 (effective April 7, 2010). Many applicable requirements for extreme 1-hour ozone nonattainment areas continue to apply to the SJVAB.

The SJVAPCD has adopted a CEQA impact analysis guideline titled *Guide for Assessing and Mitigating Air Quality Impacts* (GAMAQI). The GAMAQI is utilized in the following air quality impact analysis where applicable. The GAMAQI establishes impact significance thresholds for the non-attainment pollutant PM10 and precursors to the non-attainment pollutant ozone: reactive organic gases (ROG) and oxides of nitrogen (NOx).

Table 2 – SJVAPCD Air Quality Significance Thresholds for Construction and Operational Emissions

Pollutant/Precursor	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
	Emissions (tpy)	*Emissions (tpy)*	*Emissions (tpy)*
CO	100	100	100
NO_x	10	10	10
ROG	10	10	10
SO_x	27	27	27
PM_{10}	15	15	15
$PM_{2.5}$	15	15	15

Projects that do not generate emissions in excess of these thresholds are considered to have less than significant air quality impacts. Furthermore, within the GAMAQI, the SJVAPCD has established and outlined a three-tiered approach to determining significance related to a project's quantified ozone precursor emissions. Each tier or level requires a different degree of complexity of emissions calculation and modeling to determine air quality significance. The three-tiers established to date (from least significant to most significant) are: *Small Project Analysis Level (SPAL), Cursory Analysis Level (CAL), and Full Analysis Level (FAL).* In each of the tiers, the SJVAPCD has pre-calculated the emissions on a large number and types of projects to identify the level at which they have no possibility of exceeding the emissions thresholds. Table 2, as described above, of the GAMAQI, dated November 13, 2020, includes the threshold for single-family residential projects as resulting in less than 155 dwelling units and less than 800 Average Daily One-Way Trips for all fleet types (except Heavy-Heavy Duty Trucks (HHDT)).

Table 3 – SJVAPCD Significance Thresholds and Proposed Project Emissions

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
SJVAPCD Significance Threshold	**10**	**10**	**100**	**27**	**15**	**15**
Construction Emissions	0.54	1.18	1.72	<0.005	0.14	0.08
Above Threshold?	*NO*	*NO*	*NO*	*NO*	*NO*	*NO*
Operational Emissions	1.49	0.86	6.31	0.02	1.37	0.45
Above Threshold?	*NO*	*NO*	*NO*	*NO*	*NO*	*NO*

IMPACT ANALYSIS

a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?*

The proposed Project is located near the City of Manteca and is located within the jurisdiction of the San Joaquin Valley Air Pollution Control District (District). The District determined that the proposed Project is subject to Rule 9510 (Indirect Source Review), and the Applicant submitted applications to the District for Rule 9510 compliance and an Air Impact Assessment, which is discussed below.

The District has reviewed the proposed Project and has issued approval of an Air Impact Assessment (AIA) on March 14, 2025 (Appendix 1). Based on a review of the approved AIA, the proposed Project will result in the following:

- Baseline emissions for construction and operation will be less than two tons Nox per year and two tons PM10 per year.

The District further determined that the proposed Project is exempt from the requirements of Section 6.0 (General Mitigation Requirements) and Section 7.0 (Off-Site Emission Reduction Fee Calculation and Fee Schedules) of Rule 9510.

Notwithstanding the foregoing exemption, the District's AIA approval requires the proposed Project to comply with the District-enforced measures identified in the approved Monitoring and Reporting Schedule in order to maintain the exemption under Rule 9510. These measures require the Applicant to maintain records documenting construction and operational dates, retain applicable records for District inspection, and submit required construction and occupancy information to the District following completion of each applicable phase of the proposed Project. The District further requires notification of any changes to the proposed Project as described in the approved AIA, as changes to the construction details may result in increased Project-related emissions and loss of the Rule 9510 exemption. Accordingly, compliance with the District-approved AIA and associated Monitoring and Reporting Schedule will be required as mitigation.

Based on the analysis above and as contained in Appendix 1, the proposed Project will not conflict with any applicable air quality plans and will result in a cumulatively considerable net increase of any criteria pollutant. Therefore, the proposed Project will have a **Less Than Significant Impact with Mitigation Incorporated.**

c. *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Based on a review of the County's 2035 General Plan DEIR, land uses such as day cares centers, primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive receptors to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality problems than the general public. Residential uses are also considered as sensitive receptors.

The Project site is largely surrounded by existing industrial development, with the exception of agricultural uses to the north, east, and west. However, there are two (2) religious facilities (Central Valley Baptist Church and the New Hope Church) located to the east, and southeast. The Central Valley Baptist Church also contains the Central Valley Christian Academy, which provides education from preschool to 12th grade. Therefore, the proposed Project is located near sensitive receptors. However, based upon the proposed Project's Air Impact Assessment approval granted by the San Joaquin Valley Air Pollution Control District, the proposed Project is not anticipated to create substantial pollutant concentrations, as the baseline emissions created by the proposed Project during construction and operation are below the District's thresholds of significance.

In addition to the Air Impact Assessment discussed above, a Health Risk and Ambient Air Quality Assessment (HRA) was prepared for the proposed Project. The HRA evaluated the potential for Project-related emissions associated with the proposed truck and trailer repair facility to adversely affect nearby sensitive receptors. On September 10, 2025, the District completed its review of the HRA and associated Project prioritization and determined that the proposed Project is not expected to have a significant health impact on nearby sensitive receptors. Accordingly, based on the District's review and determination, Project-related emissions would not expose nearby sensitive receptors to substantial pollutant concentrations or result in a significant health risk.

Therefore, the proposed Project will have a **Less Than Significant Impact**.

d. *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The proposed Project is not anticipated to result in emissions adversely affecting a substantial number of people. Therefore, the proposed Project will have a **Less Than Significant Impact.**

MITIGATION MEASURES:

AIR-1: For each project phase, all records shall be maintained on site during construction and for a period of ten years following either the end of construction or the issuance of the first certificate of occupancy, whichever is later. Records shall be made available for District inspection upon request.

AIR-2: For each project phase, maintain records of (1) the construction start and end dates and (2) the date of issuance of the first certificate of occupancy, if applicable.

AIR-3: For each project phase, within thirty (30) days of issuance of the first certificate of occupancy, if applicable, submit to the District a summary report of the construction start, and end dates, and the date of issuance of the first certificate of occupancy. Otherwise, submit to the District a summary report of the construction start and end dates within 30-days of the end of each phase of construction.

4. BIOLOGICAL RESOURCES -- WOULD THE PROJECT:

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

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?*

A referral was sent to the San Joaquin Council of Governments (SJCOG) on March 6, 2026, for review. The SJCOG responded with a determination that the proposed Project is subject to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) for any future development that results in ground disturbance. Participation in the SJMSCP provides compensation for the conversion of Open Space to non-Open Space uses which affect the plant, fish and wildlife species covered by the Plan. The SJMSCP provides three (3) compensation methods: preservation of existing sensitive lands, creation of new comparable habitat on the Project site, or payment of fees that would be used to secure land outside the Project site. In addition to fee payments, the SJMSCP identifies and requires that applicants comply with Incidental Take Minimization Measures (ITMMs), which are protection measures that avoid direct impacts of development on special-status species. The proposed Project is subject to SJMSCP fees and may obtain coverage under the SJMSCP for potential biological impacts.

The SJMCSP reviewed the proposed Project and provided comments to the County on March 9, 2026. The Project site is designated as Multi-Purpose Open Space Habitat Land by the SJMCSP. The SJMCSP also noted that prior to any ground disturbing activities, the Applicant and/or Project Proponent shall participate in the SJMCSP. As such, Mitigation Measure No. Bio-1 has been incorporated into this Initial Study that requires participation in the County's SJMCSP.

Based on the analysis above, the proposed Project will have a **Less Than Significant Impact with Mitigation Incorporated**.

b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

A sensitive natural community is a biological community that is regionally rare, provides important habitat opportunities for wildlife, is structurally complex, or is in other ways of special concern to local, State, or Federal agencies. There are no streams or surface waters on or near the Project site; therefore, there is no riparian habitat in the Project vicinity. There is no sensitive natural community on or near the Project site. As noted above and in the Project Description, the Project site has been previously developed with residential development and is adjacent to existing residential and industrial development. Therefore, the proposed Project will have a **Less Than Significant Impact**.

c. *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Waters of the U.S. include navigable waterways, their tributaries, and adjacent wetlands. More specifically, Waters of the U.S. encompass territorial seas, tidal waters, and non-tidal waters, along with perennial and intermittent creeks and drainages; lakes, seeps, and springs; emergent marshes; riparian wetlands; and seasonal wetlands. Under Section 404 of the Clean Water Act, a permit issued by the U.S. Army Corps of Engineers must be secured prior to the discharge of dredged or fill materials into these waters. Waters of the State, subject to oversight by the State Water Resources Control Board (SWRCB) and by RWQCB with jurisdiction over the affected water, include isolated wetlands not covered by federal regulations.

Based on a review of the County's 2035 General Plan and DEIR, there are no wetlands, streams, or other surface waters on or near the Project site. It is not anticipated that the proposed Project would have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, the proposed Project will have a **Less Than Significant Impact**.

d. *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native residents or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Wildlife corridors refer to contiguous tracts of habitat that connect larger areas of habitat and facilitate genetic exchange within a population or between subpopulations by allowing for movement within or between habitat patches. As noted above, there are no streams on or near the Project site and the site is not part of a designated wildlife movement corridor. As noted in the County's 2035 General Plan DEIR, development projects will be required to comply with the General Plan and adopted Federal, State, and local regulations for the protection of movement corridors. Therefore, the proposed Project will have a **Less Than Significant Impact**.

e. *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

The Project site consists of raw fallow land in addition to an existing almond orchard. As part of the proposed Project, the existing almond orchard will continue in production as the development proposed is proposed on the portion of the Project site that is currently fallow.

Based on a review of the County's 2035 General Plan DEIR, Chapter 9 of the County's Development Title provides regulations which protect the County's natural resources. Significant oak trees and heritage trees are protected under the County's Tree Ordinance (Section 9-1505.3 and 9-1505.4). No significant oak and/or heritage trees were observed during a site visit on April 21, 2026; however, the proposed Project will be required to comply with the County's Development Title relative to the protection of these natural resources. Therefore, the proposed Project will have a **Less Than Significant Impact**.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

As stated in the County's 2035 General Plan DEIR, the County is a participant in the San Joaquin Multi-Species Conservation Plan (SJMSCP). The proposed Project does not propose to re-designate any land designated for opens space or habitat protection and therefore is consistent with the adopted SJMSCP. Therefore, the proposed Project will have a **Less Than Significant Impact**.

MITIGATION MEASURES:

The following mitigation measure shall be incorporated into the proposed Project:

BIO-1: The project shall participate in and obtain coverage under the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Prior to ground disturbance, the project applicant shall mitigate for the proportionate loss of potential wildlife habitat from the project site by implementing any Incidental Take Minimization Measures (ITMMs) prescribed by the San Joaquin Council of Governments (SJCOG). A biologist representing SJCOG shall visit the project site prior to the issuance of ITMMs to the City and to the project applicant.

5. CULTURAL RESOURCES -- Would the project:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. *Would the project cause a substantial cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

Based on a review of the 2035 General Plan DEIR, there are no known historical resources located in or around the Project site. Therefore, the proposed Project will have a **Less Than Significant Impact.**

b. *Would the project cause a substantial adverse chance in the significance of an archaeological resource as defined in §15064.5?*

Based on a review of the 2035 General Plan DEIR, there are no known archaeological resources located in or around the Project site. Therefore, the proposed Project will have a **Less Than Significant Impact.**

c. *Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

It is not anticipated that human remains would be discovered on the Project site during project construction. However, in the event that human remains are identified during project construction, mitigation measure no. CUL-1 has been incorporated into this Initial Study. Therefore, the proposed Project will have a **Less Than Significant Impact with Mitigation Incorporated.**

MITIGATION MEASURES:

The following Mitigation Measure shall be incorporated into the proposed Project in order to mitigate any potential impacts to a less than significant level:

CUL-1: *In accordance with Section 15064.4(e) of the CEQA Guidelines, in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:*

- *There shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until:*
  - *The coroner of the County in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required;*
  - *If the coroner determines the remains to be Native American:*
    - *The coroner shall contact the Native American Heritage Commission within 24 hours.*
    - *The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American.*
    - *The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.*

6. ENERGY -- Would the project:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

b. *Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?*

The proposed Project will consume energy during both construction and long-term operation of the proposed Project. Construction-related energy consumption will occur through the use of heavy equipment, construction vehicles, haul trucks, and operation of construction-related machinery and tools. Operational energy demand would primarily consist of electricity usage associated with the office, truck repair, and parts storage buildings; propane or similar fuel consumption for operational activities; and energy associated with groundwater pumping and water conveyance from the proposed on-site well system. Despite these energy demands, the proposed Project will not result in wasteful, inefficient, or unnecessary consumption of energy resources as the proposed Project will be required to comply with all applicable Federal, State, and local energy efficiency regulations, including current California Building Energy Efficiency Standards (Title 24) and applicable construction and operational efficiency requirements.

Further, the San Joaquin County 2035 General Plan includes goals and policies intended to reduce energy consumption and encourage sustainable development practices. Specifically, General Plan Policy LU-6.8 encourages employment and industrial projects to incorporate sustainable technologies, including energy-efficient and water-efficient practices, while Policy PHS-5.13 promotes reduction in overall energy consumption. Compliance with these policies and applicable regulatory standards will ensure the proposed Project does not conflict with adopted plans for renewable energy or energy conservation. Therefore, the proposed Project will have a **Less Than Significant Impact**.

MITIGATION MEASURES:

Mitigation is not required for this topic.

7. GEOLOGY AND SOILS -- WOULD THE PROJECT:

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

The Soil Survey of San Joaquin County classifies the soil on the Project site as Timor loamy sand, zero (0) to two (2) percent slopes. The Timor series consists of very deep, somewhat excessively drained soils formed in sandy alluvium on nearly level alluvial fans and terraces. Timor loamy sand has rapid permeability and slow runoff. These soils are well suited to irrigated orchards, vineyards, and field crops where irrigation water is available. If these soils are used for industrial development, the primary limitations are associated with the loose, sandy nature of the soils, which may require appropriate grading, compaction, and foundation design as recommended by a site-specific geotechnical investigation. Due to their rapid permeability, these soils are generally suitable for on-site wastewater disposal systems, subject to review and approval by the San Joaquin County Environmental Health Department. The map unit is classified as Capability Unit IIe-1, irrigated, reflecting its agricultural productivity under irrigated conditions.

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a.1. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

a.2. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

a.3. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

a.4. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

b. *Would the project result in substantial soil erosion or the loss of topsoil?*

Based on a review of the County's 2035 General Plan DEIR, there are seven (7) active faults within the vicinity of San Joaquin County. These faults include the following; Marsh Creek-Greenville, Calaveras, Hayward, Mt. Diablo Thrust, Concord-Green Valley, San Andreas, and the Foothills Fault System. The nearest fault to the Project site is an unnamed fault located just west of the Manteca city limits (See Figure 4.I-2 of 2035 General Plan DEIR). There are no existing faults located within or near the Project site, which is located east of the Manteca city limits. Therefore, substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake along with seismic ground shaking are less than significant.

Liquefaction is a transformation of soil from a solid to a liquefied state during which saturated soil temporarily loses strength resulting from the buildup of excess pore water pressure, especially during earthquake-induced cycle loading. The County's 2035 General Plan DEIR states that the Delta portion of the County is likely to have areas with moderate to high susceptibility for liquefaction. The Project site is not identified in the 2035 General Plan DEIR as an area to contain moderate or high risk of liquefaction. In addition, the proposed Project will be required to adhere to Policy PHS-3.5 Subsidence of Liquefaction, which requires the proposed Project to comply with the most current adopted County building code. Therefore, consistent with the 2035 General Plan DEIR, the proposed Project will have a less than significant impact on liquefaction.

Landslides generally occur in areas with varying or steep topography. The County's 2035 General Plan DEIR states that areas in the county near Delta levees, or within the upland areas of the southwestern Diablo Range locations are susceptible to landslides. The Project site is relatively flat, with little or no slope and is not located in a susceptible area. The likelihood of a landslide occurring within or near the Project site is minimal. Therefore, the impact is less than significant.

Construction of the proposed Project will require a National Pollutant Discharge Elimination System (NPDES) permit along with implementation of a Storm Water Pollution Prevention Plan (SWPP). In addition, the proposed Project will be required to comply with 2035 General Plan Policies PHS-3.7 and PHS-3.8 as it relates to erosion and the loss of topsoil. Impacts are considered to be less than significant.

Based on the above analysis, the proposed Project will have a **Less Than Significant Impact**.

c. *Would the project be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

Refer to the discussion above in a.1 through a.4 and b.

d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?*

Based on a review of the County's 2035 General Plan DEIR, and specifically, Figure 4.I-1, the Project site is located on soils considered to have low expansive capability. Therefore, the proposed Project will have a **Less Than Significant Impact**.

e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The proposed Project consists of installing and operating a private wastewater septic system to accommodate wastewater generated by the proposed Project. The private septic system will consist of the following:

- 3,000 square foot filter bed septic system;
- 3,000 square foot filter bed septic system 100% replacement area; and,
- Sewer lines connecting the proposed structures to the septic system.

The proposed Project will generally result in wastewater that is considered household (restrooms, etc.) and the wastewater demand generated from the proposed Project is not considered to be substantial. The County's Environmental Health Department has reviewed the proposed Project and provided comments on March 25, 2026, which are as follows:

- A soil suitability and nitrate loading study incorporating staff and customer use shall be submitted to the Environmental Health Department, indicating that the area is suitable for septic system usage. The studies must be approved by the Environmental Health Department prior to the issuance of building permits.
- The sewage disposal system shall comply with the onsite wastewater treatment system standards of San Joaquin County prior to approval. A percolation test conducted in accordance with the E.P.A. Design Manual – Onsite Wastewater and Disposal Systems is required for each parcel.
- Prior to the issuance of building permits, submit to the Environmental Health Department a revised site plan showing the location and configuration of any existing and proposed sewage disposal systems, along with the area required to be reserved for future sewage disposal repair/replacement (area for 100% sewage disposal replacement). The plans shall include the design calculations, including the maximum number of persons the sewage disposal system is proposed to serve.
- Construction of an individual sewer disposal system under permit and inspection by the Environmental Health Department is required at the time of development based on the Soil Suitability/Nitrate Loading Study findings.

The above requirements will be incorporated into the proposed Project as Conditions of Approval, and they are intended to ensure the proposed sewage disposal system complies with all Federal, State, and Local policies and regulations related to private sewage disposal systems. Therefore, the proposed Project will have a **Less Than Significant Impact.**

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project site is not known to contain any unique paleontological resources or unique geologic features. However, if previously undiscovered unique paleontological resources or unique geologic features are encountered during grading, excavation, or other ground-disturbing activities, all work in the vicinity of the discovery shall cease immediately until a qualified professional has evaluated the significance of the resource and appropriate avoidance, preservation, or mitigation measures have been implemented in accordance with state laws. Accordingly, the proposed Project would result in a **Less Than Significant Impact**

MITIGATION MEASURES:

Mitigation is not required for this topic.

8. GREENHOUSE GAS EMISSIONS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation*	*Less Than Significant Impact*	*No Impact*
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

REGULATORY SETTING:

California Air Resources Board (CARB) is responsible for the coordination and oversight of state and local air pollution control programs in California. California has numerous regulations aimed at reducing the State's GHG emissions. These initiatives are summarized below:

Assembly Bill 1943

Assembly Bill (AB) 1943 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, U.S. EPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year. Pavley I took effect for model years starting in 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" will cover 2017 to 2025. Fleet average emission standards would reach 22 percent reduction from 2009 levels by 2012 and 30 percent by 2016. The Advanced Clean Cars program coordinates the goals of the Low Emission Vehicles (LEV), Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, when rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels.

Executive Order S-3-05

In 2005, the governor issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent below 1990 levels (California Environmental Protection Agency [CalEPA]). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc. In April 2015, the governor issued EO B-30-15, calling for a new target of 40 percent below 1990 levels by 2030.

Assembly Bill 32

California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006," signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels; the same requirement as under S-3-05) and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. California is on track to meet or exceed the current target of reducing GHG emission to 1990 levels by 2020, as established by AB 32.

Senate Bill 97

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

CARB Resolution 07-54

CARB Resolution 07-54 establishes 25,000 MT of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold is just over 0.005 percent of California's total inventory of GHG emissions for 2004.

Executive Order S-13-08

Executive Order S-13-08 indicates that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the order, the 2009 California Climate Adaptation Strategy (California Natural Resources Agency 2009) was adopted, which is the "...first statewide, multi-sector, region-specific, and information-based climate change adaption strategy in the United States." Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Senate Bill 2X

In April 2011, the governor signed SB2X requiring California to generate 33 percent of its electricity from renewable energy by 2020.

Senate Bill 32

On September 8, 2016, the governor signed Senate Bill 32 (SB 32) into law, which requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 is an extension of AB 32. The other provisions of AB 32 remain unchanged. CARB adopted the 2017 Climate Change Scoping Plan Update on December 14, 2017, for achieving California's 2030 greenhouse gas target.

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*
b. *Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Based on a review of the County's 2035 General Plan DEIR, the County has adopted Greenhouse Gas (GHG) reduction strategies, which are as follows:

Energy Strategy 1: Renewable Energy/PACE Program. The County shall develop and implement an incentive program to encourage the installation of solar hot water heaters and solar PV on existing and new developments. The County shall establish a Property Assessed Clean Energy (PACE) (AB 811) program and for residential and commercial energy efficiency retrofit projects.

Energy Strategy 2: Participation in PG&E Renewable Energy. The County shall participate in PG&E's Renewable Energy program.

Transportation Strategy 1: Complete Streets. The County shall encourage the development of complete streets.

Waste Strategy 1: Diversion, Recycling, and Reuse. The County shall achieve a 75% diversion of landfilled waste by 2020 and shall achieve a diversion rate of 90% by 2035.

Water and Wastewater Strategy 1: Water Conservation. The County shall achieve a 20% reduction in water and wastewater by 2020.

Agriculture Strategy 1: Agricultural Equipment and Emissions. The County shall implement the following measures pertaining to agricultural equipment and emissions reductions:

- Support SJVAPCD programs to fund equipment upgrades, retrofits and replacement through the Carl Moyer heavy-duty vehicle and equipment program or other funding mechanisms (e.g., Rule 9510).
- Work with SJVAPCD and stakeholders to identify practical and feasible options for fuel-efficient agricultural equipment.
- Work with agricultural organizations and stakeholders to provide workshops and presentations and outreach materials focused on promoting fuel efficient farm equipment and operations and encourage participation in the Carl Moyer incentive program.

Agriculture Strategy 2: Agricultural Fertilizer Application. The County shall work with agricultural organizations and stakeholders to implement best practices and create an outreach program to inform farmers about ways to reduce fertilizer application with minimal to no effects on crop yield.

Agriculture Strategy 3: Agriculture Burning. The County shall work with agricultural organizations and stakeholders to implement best practices to reduce agricultural burning (and create an outreach program to inform farmers).

Agriculture Strategy 4: Agricultural Energy Use. The County shall work with agricultural organizations, irrigation districts, and stakeholders to develop an outreach and incentives program (e.g., rebate opportunities, waive permit fees, registration amnesty program) to encourage farmers to improve the efficiency of irrigation pumps.

Agriculture Strategy 5: Manure Management. The County shall encourage sustainable manure management practices.

In addition to the reduction strategies above, the County has also adopted the following implementation policies that are applicable to the proposed Project:

PFS-3.4: New Energy Efficient Buildings. When building new facilities, the County shall achieve a high standard (e.g., equivalent to LEED certification) of energy efficiency and water conservation and employ renewable energy technologies.

PHS-5.13: Energy Consumption Reduction. The County shall encourage new development to incorporate green building practices and reduce air quality impacts from energy consumption.

The proposed Project includes the development of an office, truck repair shop, parts storage, twenty-six (26) truck and trailer parking stalls, five (5) truck and trailer repair staging stalls, and nine (9) automobile stalls to allow for the operation of the S-Line Transport trucking company. Specific sizes proposed for the office, truck repair shop, and parts storage area are as follows:

Building	Size (square feet)
Office	625
Truck Repair Shop	3,750
Parts Storage	625
Total	**5,000**

Impacts to greenhouse gas emissions created by the proposed Project are anticipated to be less than significant due to the size and scope of the proposed Project. Buildings proposed under the proposed Project will be required to comply with all Federal, State, and local requirements and building codes, including Title 24 and the County's most recently adopted Building Code. In addition, the proposed Project will comply with the policies set forth in the County's 2035 General Plan that addresses greenhouse gas emissions and therefore, the proposed Project will not create any conflicts with the 2035 General Plan. Therefore, the proposed Project will have a **Less Than Significant Impact.**

Mitigation Measures:
Mitigation is not required for this topic.

9. HAZARDS AND HAZARDOUS MATERIALS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?			X	

IMPACT ANALYSIS

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

The proposed Project is required to adhere to all Federal, State, and Local policies and regulations related to the routine transport, use, or disposal of hazardous materials. Therefore, the proposed Project will have a **Less Than Significant Impact.**

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?*

The proposed Project is required to adhere to all Federal, State, and Local policies and regulations related to the release of hazardous materials. Therefore, the proposed Project will have a **Less Than Significant Impact.**

The proposed Project includes improvements associated with a truck parking and repair facility, which may involve the routine use, storage, and handling of hazardous materials typically associated with vehicle maintenance and repair operations, including, but not limited to, motor oils, lubricants, fuels, coolants, solvents, batteries, and other automotive fluids. These materials will be stored, handled, and disposed of in accordance with all applicable Federal, State, and local laws and regulations, including requirements administered by the California Department of Toxic Substances Control (DTSC), California Environmental Protection Agency (CalEPA), Central Valley Regional Water Quality Control Board (CVRWQCB), San Joaquin Valley Air Pollution Control District (SJVAPCD), San Joaquin County Fire Prevention Bureau, and the Lathrop-Manteca Fire District. Hazardous wastes generated by the facility will be properly managed and disposed of through licensed hazardous waste handlers, and appropriate spill prevention and containment measures will be implemented to minimize the potential for accidental releases. Accordingly, compliance with these regulatory requirements will reduce the potential for upset and accident conditions involving the release of hazardous materials. Therefore, the proposed Project will have a **Less Than Significant Impact.**

c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The proposed Project is not located within 0.25 miles of an existing or proposed school. The nearest school to the Project site is Central Valley Christian Academy, which is located approximately 0.30 miles from the Project site. Therefore, the proposed Project will have **Less Than Significant Impact.**

d. *Would the project be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Based on a review of the California Department of Toxic Substances Control (DTSC) EnviroStor (https://dtsc.ca.gov/dtscs-cortese-list/), the Project site is not included on a list of hazardous materials sites compiled pursuant to Section 65962.5 of the California Government Code. Therefore, the proposed Project will have a **Less Than Significant Impact.**

e. *For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

The Project site is not located within an airport land use plan or within two (2) miles of an existing airport. Therefore, the proposed Project will have a **Less Than Significant Impact.**

f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The County's Office of Emergency Services is responsible for managing and maintaining the County's Emergency Operations Plan. The most recent Emergency Operations Plan was prepared in 2022, and it generally accomplishes the following:

- Establishes a county emergency management structure, which will coordinate and support on-scene responses.
- Establishes the overall operational concepts associated with the management of incidents, emergencies, crises, disasters, and catastrophes at the County and operational area levels.
- Provides a flexible platform for planning and response to all hazards, incidents, events, and emergencies believed to be important to the operational area.

In addition to the County's Emergency Operations Plan, the San Joaquin County Office of Emergency Services is currently preparing the 2026 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) in coordination with participating cities, special districts, and other planning partners throughout the County. The 2026 MJHMP is currently in draft form and has been released for public review and comment. The MJHMP identifies hazards that pose risks to communities within San Joaquin County, assesses vulnerabilities associated with those hazards, and establishes mitigation strategies intended to reduce or eliminate long-term risks to people, property, and infrastructure.

The proposed Project will not interfere with, obstruct, or otherwise impair implementation of the County's Emergency Operations Plan or the 2026 Multi-Jurisdictional Hazard Mitigation Plan and will adhere to all policies and regulations related to emergency services and response. Therefore, the proposed Project will have a **Less Than Significant Impact.**

g. *Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

The Project site is not located in an area considered to be wildlands. Therefore, the proposed Project will have a **Less Than Significant Impact.**

MITIGATION MEASURES:

Mitigation is not required for this topic.

10. HYDROLOGY AND WATER QUALITY -- Would the project:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
i) Result in substantial on- or offsite erosion or siltation;			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a), (b), and (c):

a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

   i. *Result in substantial on- or offsite erosion or siltation;*
   ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
   iii. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
   iv. *Impede or redirect flood flows?*

The proposed Project includes the installation of a private domestic water system necessary to serve potable water to the truck repair shop and office buildings. Improvements proposed on the Project site include a domestic water well and fire suppression storage tank, both of which will be located at the northwest corner of the developed Project site. Domestic water lines will also be installed to provide water service to the proposed Project's structures.

For storm water discharge, the proposed Project includes the installation of a storm drain retention basin and wastewater is provided by the installation of a private on-site sewage septic system.

The County's Public Works Department has reviewed the proposed Project and has provided comments and feedback, including but not limited to requiring the Project Proponent to obtain the required standard permits and paying the applicable, standard fees. While the proposed Project is not anticipated to violate any water quality standards, Conditions of Approval will be incorporated into the proposed Project to ensure there are no violations of any waste discharge requirements. Specifically, the proposed Project will be subject to the following:

- The proposed Project is subject to the NPDES Region-Wide Permit requirements.
  - A registered professional engineer shall design the site to treat the 85th percentile storm as defined in the County's 2023 Storm Water Quality Control Criteria Plan.
  - A registered professional engineer shall design the site to comply with the volume reduction requirements outlined in the County's 2023 Storm Water Quality Control Criteria Plan.
  - A registered professional engineer shall design the site to comply with the trash control requirements outlined in the County's 2023 Storm Water Quality Control Criteria Plan.
- Prior to the release of a Building Permit, the Property Owner shall enter into an agreement with San Joaquin County for post-construction maintenance of stormwater quality facilities.

- Prior to the release of a Building Permit, the Applicant shall submit a Storm Water Quality Control Plan to the Public Works Department that complies with all requirements of the 2023 Storm Water Quality Control Criteria Plan.
- Prior to the release of a Building Permit, the Applicant shall submit to the County for review and approval the Storm Water Pollution Prevention Plan.
- The Applicant shall file a Notice of Intent (NOI) with the State Water Resources Control Board and comply with the State "General Permit for Storm Water Discharges Associated with Construction Activity." The WDID number shall be provided to the County Public Works Department.

In addition, the South San Joaquin Irrigation District (SSJID), which owns, operates, and maintains irrigation and drainage facilities in the vicinity of the Project site, has reviewed the proposed Project. The SSJID has no objection to the proposed Project, subject to the following conditions:

- No encroachments shall occur within SSJID easements without prior written approval from SSJID.
- The proposed Project shall not result in runoff, drainage, or discharge into SSJID facilities without prior review and approval by SSJID.
- The Applicant shall be responsible for protecting the proposed development from adjacent agricultural irrigation operations, including potential water conveyance and seepage impacts.

The proposed Project will be required to comply with the conditions above. In addition, the proposed Project will comply with all Federal, State, and local policies and regulations related to water quality, groundwater management, and stormwater discharge.

Based on the analysis above, the proposed Project will have a **Less Than Significant Impact.**

d. *Would the project be located in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation?*

Based on a review of the County's 2035 General Plan DEIR, the proposed Project is not located in a flood hazard, tsunami, or seiche zone, or risk release of pollutants due to project inundation. Therefore, the proposed Project will have a **Less Than Significant Impact.**

e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The proposed Project will be served water by a private domestic well and fire suppression will be provided by a private static fire suppression well.

MITIGATION MEASURES:

Mitigation is not required for this topic.

11. LAND USE AND PLANNING - Would the project:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Physically divide an established community?			X	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. *Would the project physically divide an established community?*
b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The Project site is located at the terminus of South Comconex Road and is contiguous to surrounding properties characterized by and designated for industrial land uses, including properties designated Limited Industrial (I-L). Pursuant to the San Joaquin County 2035 General Plan, the I-L designation is intended to accommodate light manufacturing, distribution, industrial, and employee-supporting retail and service uses. The proposed Project includes a General Plan Map Amendment and Zone Reclassification to Warehouse Industrial (I/W), a designation intended to accommodate warehouse, distribution, truck repair, maintenance, and related industrial uses.

The proposed Project would not physically divide an established community, as the site is located within an existing industrially developing area and does not contain residential neighborhoods, community corridors, or other features that would be disrupted by implementation of the proposed Project. Rather, the proposed Project represents a natural extension of the existing industrial development pattern within the surrounding area.

Additionally, the proposed Project would not result in a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The requested General Plan Amendment, Zone Reclassification, and associated entitlement applications are intended to establish consistency between the proposed industrial operations and the County's land use framework for industrial development in the project vicinity. Furthermore, the proposed Project would remain subject to all applicable County development standards, conditions of approval, and mitigation measures identified through the project review process. Accordingly, the proposed Project will result in a **Less Than Significant Impact.**

MITIGATION MEASURES:

Mitigation is not required for this topic.

12. MINERAL RESOURCES -- WOULD THE PROJECT RESULT IN:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

Based on a review of the County's 2035 General Plan DEIR, the Project site is not known to contain mineral resources that are of value to the region or as delineated in the County's 2035 General Plan. Therefore, the proposed Project will have a **Less Than Significant Impact.**

MITIGATION MEASURES:

Mitigation is not required for this topic.

13. NOISE -- WOULD THE PROJECT RESULT IN:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or other applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a), (b), and (c):

a. *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*
b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*
c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The proposed Project will result in temporary increases in ambient noise levels during construction activities associated with grading, paving, building construction, and installation of site improvements. However, construction-related noise would be temporary and intermittent in nature and would occur in compliance with Section 9-404 of the County's Municipal Code which governs construction hours and equipment operations. General construction noise is limited to weekdays from 6:00 a.m. to 9:00 p.m. Pre-construction activities, including but not limited, to loading and unloading, deliveries, and truck idling are also subject to the same time frame.

Table 9-404.040, Maximum Allowable Noise Exposure for Noise Sensitive Land Uses, of the San Joaquin County Development Title establishes a maximum allowable daytime outdoor noise exposure level of 75 dB for noise-sensitive land uses. While the proposed Project includes an industrial trucking and maintenance operations that have the potential to generate operational noise associated with truck movements, idling, and repair activities, the Project site is located within an area characterized by existing industrial and warehouse-related land uses and in proximity to State Route 120 and State Route 99. As such, the surrounding environment is already influenced by existing industrial related noise sources.

One (1) single-family residence located approximately five hundred (500) feet north of the Project site, as well as New Hope Church and Central Valley Baptist Church located south of the Project site, may serve as existing noise-sensitive receptors. The northern residence is buffered from the Project site by an existing orchard, while the churches may function as intermittent noise-sensitive receptors during worship services, assemblies, and other related activities. In addition to these existing receptors, lands within the City of Manteca City limits and Sphere of Influence in the vicinity and located west of the Project site are designated Low Density Residential (LDR) pursuant to the City of Manteca 2043 General Plan. The LDR designation allows for a mix of single-family residential development at densities ranging from 2.1 to eight (8) dwelling units per acre. Although these areas may not presently be developed with residential uses, the General Plan anticipates future residential development within the LDR designated areas. Accordingly, future development consistent with the City's General Plan could introduce additional noise-sensitive residential receptors in the vicinity of the Project site. However, the proposed Project has been designed with substantial setbacks, truck circulation patterns, and operational areas oriented inward and away from adjacent properties to minimize the potential for off-site noise impacts to the extent feasible. Additionally, the existing almond orchard proposed to remain on-site would provide both visual separation and a degree of acoustic buffering between the proposed Project and surrounding properties.

Furthermore, long-term operational noise associated with the proposed Project would remain subject to compliance with applicable provisions of the San Joaquin County 2035 General Plan, including Policies PHS-9.1, PHS-9.3, PHS-9.4, and PHS-9.6, which seek to protect residents and sensitive receptors from excessive and nuisance noise exposure through appropriate site design, operational considerations, and enforcement of established noise standards. Given the Project site's location within an established industrial area and separation from sensitive residential receptors, the proposed Project will not result in a substantial permanent increase in ambient noise levels in excess of applicable General Plan policies.

The proposed Project will not result in excessive groundborne vibration or groundborne noise levels. Construction activities may generate limited temporary vibration associated with heavy equipment operation; however, such impacts will be short-term and will not occur at levels substantial enough to adversely affect surrounding properties or structures. In addition, operation of the proposed trucking facility would not involve industrial processes or equipment typically associated with significant groundborne vibration.

The Project site is not located within the vicinity of a private airstrip, airport land use compatibility plan area, or within two miles of a public airport or public use airport. Therefore, implementation of the proposed Project will not expose people residing or working in the project area to excessive aircraft-related noise levels. Accordingly, the proposed Project will have a **Less Than Significant Impact.**

MITIGATION MEASURES:

Mitigation is not required for this topic.

14. POPULATION AND HOUSING -- Would the project:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

IMPACT ANALYSIS

a. *Would the project induce substantial population in one area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The proposed Project will not induce substantial population growth, either directly or indirectly. The proposed Project involves the conversion of an approximately 16.52-acre site from agricultural to industrial use and the development of a trucking operations facility consisting of a small office, truck repair shop, parts storage, and associated vehicle parking and staging areas, totaling 4.02-acres of the Project site. The proposed Project does not include residential uses or other development that would generate a permanent increase in population.

Additionally, the proposed Project will be served by existing roadways and new private on-site utilities, including a well and septic system, and does not propose the extension of major infrastructure that would facilitate or induce further growth in the surrounding area. Therefore, the proposed Project will have a **Less Than Significant Impact**

b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The proposed Project will not displace substantial numbers of existing people or housing. The Project site is currently undeveloped and utilized as an almond orchard, with no existing residential units or occupied structures on-site. Therefore, the proposed Project will have a **Less Than Significant Impact**

MITIGATION MEASURES:

Mitigation is not required for this topic.

15. PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?			X	
e) Other public facilities?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a), (b), (c), (d), and (e):

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?*

b. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?*

c. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

d. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

e. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for* other public facilities*?*

The proposed Project includes a truck and trailer repair facility, including an office, repair shop, and associated parking and staging areas, which would incrementally increase demand for fire protection services. However, this increase would not be substantial, and the Lathrop-Manteca Fire District is expected to accommodate the proposed Project within current service capabilities. The proposed Project includes on-site fire protection features, such as a fire suppression tank and site access improvements, which would support emergency response. As such, the proposed Project would not require the construction of new or expanded fire protection facilities.

The Project Site's design, including controlled access and perimeter fencing, would further minimize potential service demands. The services provided by San Joaquin County Sheriff would adequately serve the proposed Project without the need for new or physically altered facilities.

The proposed Project will not result in significant impacts on school facilities. The proposed Project does not include residential uses and would not generate new student population. Therefore, there would be no increase in school enrollment or demand for additional school facilities, and no associated physical impacts. Further, as an industrial development, the proposed Project would not generate population growth or increased demand for park or recreational services. Accordingly, the proposed Project will not necessitate the expansion or construction of park facilities.

Lastly, the proposed Project will not result in substantial adverse physical impacts related to other public facilities. The development would be served by private utilities, including an on-site well and septic system, and will not rely on the expansion of public utility infrastructure. The project's scale and operational characteristics would not generate demand requiring new or expanded governmental facilities. Therefore, the proposed Project will have a **Less Than Significant Impact.**

MITIGATION MEASURES:
Mitigation is not required for this topic.

16. RECREATION

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

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or accelerated?

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

The proposed Project will not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of such facilities would occur or be accelerated. The proposed Project includes the development and operation of a warehouse industrial/trucking facility, comprised of an office, truck repair shop, parts storage area, truck parking, and associated site improvements on an approximately 16.52-acre site proposed to be re-designated and rezoned for Warehouse Industrial uses.

Industrial development of this nature does not typically generate demand for public parks or recreational facilities, as the proposed Project does not include residential uses or other population-serving components that would increase utilization of recreational amenities. Additionally, the proposed Project will not result in the introduction of a residential population that would necessitate the expansion or construction of neighborhood or regional park facilities. Therefore, the proposed Project will have a **Less Than Significant Impact.**

MITIGATION MEASURES:

Mitigation is not required for this topic.

17. TRANSPORTATION/TRAFFIC -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a) and (b):

a. *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*
b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Access to the Project site will be provided via State Route 120, which is functionally classified as a Principal Arterial and designated as a County roadway of regional significance. The proposed Project includes a truck and trailer repair facility and is not anticipated to generate traffic volumes substantial enough to adversely affect the operational performance of State Route 120 or surrounding regional roadway facilities. Additionally, the Project site's proximity to State Route 120 and State Route 99 allows truck traffic to efficiently access the regional circulation network without traversing substantial local roadways or residential areas.

A review of the San Joaquin County Bicycle Master Plan Update (November 2020) indicates that there are currently no designated bicycle lanes, bicycle routes, or pedestrian facilities along Comconex Road adjacent to the Project site. The nearest proposed bicycle facility is a Class II Bicycle Lane, located approximately 0.69-miles west of Comconex Road, planned along Austin Road. The 2035 General Plan does not identify planned bicycle improvements within the Project frontage. As such, the proposed Project would not remove, alter, or preclude the future implementation of existing or planned bicycle or pedestrian facilities. Due to the industrial nature of the proposed Project, it is not expected to generate bicycle or pedestrian travel demand, nor would it interfere with the safe operation of the existing circulation system for non-motorized users.

General Plan Policy TM-3.1, Roadway Provisions, states that San Joaquin County shall maintain Level of Service (LOS) standards consistent with the San Joaquin Council of Governments (SJCOG) Congestion Management Program (CMP) for State highways and designated County roadways and intersections of regional significance. Pursuant to the CMP, designated CMP roadways and intersections are required to operate at LOS D or applicable Caltrans standards, whichever is more restrictive.

However, pursuant to CEQA Guidelines Section 15064.3, transportation impacts are evaluated based on vehicle miles traveled (VMT), rather than level of service or other measures of vehicle delay. The Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA states that VMT is the most appropriate metric for evaluating transportation impacts and emphasizes that the purpose of SB 743 is to promote the reduction of greenhouse gas emissions, development of multimodal transportation networks, and efficient land use patterns*.

The proposed Project includes a relatively small-scale truck repair, maintenance, and parking facility located adjacent to existing industrially designated and developed properties within an established industrial area intended for industrial related uses. The proposed Project would not introduce residential, or retail uses typically associated with substantial increases in daily passenger vehicle trips or VMT generation. Additionally, the Project site's proximity to State Route 120 and State Route 99 supports efficient truck circulation and reduces the need for trucks to travel longer distances to locate repair, maintenance, and staging facilities. In this regard, the proposed Project would consolidate truck-related operations within an existing industrial area already served by the regional transportation network.

The OPR Technical Advisory further recognizes that heavy-duty truck VMT may be considered differently than passenger vehicle travel and acknowledges that VMT analysis should focus on land use types that substantially influence travel behavior, such as residential, office, and retail development. The proposed Project would primarily serve existing trucking activities already occurring throughout the region, rather than inducing substantial new vehicle travel demand or alter regional patterns. The proposed Project will not expand roadway capacity, create new through lanes, or otherwise result in transportation infrastructure improvements associated with induced vehicle travel as described in the OPR Technical Advisory.

As such, the proposed Project will not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, General Plan Policy TM-3.1, CMP standards, or the State's adopted VMT guidance. Therefore, the proposed Project will have a **Less Than Significant Impact**.

The following discussion is an analysis for criteria (c) and (d):

c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

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* Office of Planning and Research. (2018). Technical Advisory on Evaluating Transportation Impacts in CEQA. Accessed May 11, 2026, https://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf

d. *Would the project result in inadequate emergency access?*

The proposed Project proposes primary site access via a new industrial driveway connecting to South Comconex Road. In accordance with County review procedures, the Project referral was distributed to the San Joaquin County Sheriff's Office, the San Joaquin County Fire Prevention Bureau, the San Joaquin County Department of Public Works, and the Lathrop-Manteca Fire District on March 6, 2026, for review and comment. No concerns were raised by the responding agencies regarding emergency access, circulation, site design, or the operational characteristics of the proposed Project.

Based on review of the site plan dated January 21, 2025, and the proposed circulation improvements, the proposed Project will not create identifiable safety hazards, capacity deficiencies, or sight distance conflicts. The site plan has been designed to accommodate truck circulation associated with the proposed trucking operations, including adequate internal maneuvering areas and turning radii capable of accommodating large tractor-trailer trucks. Additionally, the proposed Project would not introduce hazardous geometric roadway design features, such as sharp curves or dangerous intersections, nor would it result in incompatible traffic conflicts between industrial truck traffic and agricultural equipment beyond those already existing within the surrounding area.

Accordingly, the proposed Project will not substantially increase hazards due to a geometric design feature or incompatible uses and would not adversely affect emergency access or response capabilities. Therefore, the proposed Project will have a **Less Than Significant Impact**.

MITIGATION MEASURES:

Mitigation is not required for this topic.

18. TRIBAL CULTURAL RESOURCES -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?			X	

Effective July 1, 2015, Assembly Bill 52 (AB 52) amended CEQA to mandate consultation with California Native American tribes during the CEQA process to determine whether or not the proposed Project may have a significant impact on a Tribal Cultural Resource. Section 21073 of the Public Resources Code defines California Native American tribes as "a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for the purposes of Chapter 905 of the Statutes of 2004." This includes both federally and non-federally recognized tribes. Section 21074(a) of the Public Resource Code defines Tribal Cultural Resources for the purpose of CEQA as:

1) Sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

a. included or determined to be eligible for inclusion in the California Register of Historical Resources; and/or
b. included in a local register of historical resources as defined in subdivision (k) of Section 5020.1; and/or

c. a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Because criteria A and B also meet the definition of a Historical Resource under CEQA (see Section 5 of this document), a Tribal Cultural Resource may also require additional (and separate) consideration as a Historical Resource. Tribal Cultural Resources may or may not exhibit archaeological, cultural, or physical indicators.

Recognizing that California tribes are experts in their Tribal Cultural Resources and heritage, AB 52 requires that CEQA lead agencies carry out consultation with tribes at the commencement of the CEQA process to identify Tribal Cultural Resources. Furthermore, because a significant effect on a Tribal Cultural Resource is considered a significant impact on the environment under CEQA, consultation is required to develop appropriate avoidance, impact minimization, and mitigation measures. Consultation is concluded when either the lead agency and tribes agree to appropriate mitigation measures to mitigate or avoid a significant effect, if a significant effect exists, or when a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached, whereby the lead agency uses its best judgement in requiring mitigation measures that avoid or minimize impact to the greatest extent feasible.

IMPACT ANALYSIS

a. *Would the project cause a significant adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

    1. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
    2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

2035 General Plan Policy NCR-6.6 Tribal Consultation states, "The County shall consult with Native American tribes regarding proposed development projects and land use policy changes consistent with the State's Local and Tribal Intergovernmental Consultation requirements." Consistent with this General Plan Policy, during the Project referral period, notifications were sent to the California Native American Heritage Commission (NAHC) and the following Tribes:

- Buena Vista Rancheria
- California Valley Miwok Tribe
- United Auburn Indian Community

- North Valley Yokuts Tribe

The County received a written response, dated June 11, 2026, from the California Valley Miwok Tribe indicating that the California Valley Miwok Tribe did not have a comment or concern regarding the proposed Project. Additionally, no comments or concerns have been received from the NAHC or other tribes listed above.

If any suspected Tribal Cultural Resources (TCR) are discovered during ground disturbing activities, all work shall cease within one-hundred (100) feet of the find. A Tribal Representative from the culturally affiliated tribe shall be immediately notified to determine if the find is a TCR pursuant to Public Resources Code Section 21074. The Tribal Representative will make recommendations regarding the treatment of the discovery. Preservation in place is the preferred alternative under CEQA and UAIC protocols, and every effort shall be made to preserve resources in place, including through project redesign if necessary. Work at the discovery location may not resume until all necessary investigation and evaluation of the discovery under CEQA, including AB 52, has been satisfied. The contractor shall implement any measures deemed necessary and feasible by the lead agency to preserve, avoid, or minimize impacts to the resource, including facilitating appropriate tribal treatment of the find.

Additionally, should human remains be discovered during any ground-disturbing activities, all work shall stop immediately in the vicinity (e.g., 100 feet) of the finds until they can be verified. The County coroner shall be immediately contacted in accordance with Health and Safety Code section 7050.5(b). Protocols outlined in Health and Safety Code sections 7050.5(b) and 7050.5(c), as well as Public Resources Code section 5097.98, shall be followed.

As a result of these conditions and existing Health and Safety Code regulations, any impact to tribal cultural resources is anticipated to have a **Less Than Significant Impact**.

MITIGATION MEASURES:

Mitigation is not required for this topic.

19. UTILITIES AND SERVICE SYSTEMS -- WOULD THE PROJECT:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a), (b), (c), (d), and (e):

a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?*
b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

c. *Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?*
d. *Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
e. *Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?*

The proposed Project would be served primarily by private utility infrastructure, including the drilling of a new on-site water well, installation of a private wastewater septic system, construction of a fire suppression water tank, and development of an on-site stormwater drain basin located along the southern and western portions of the Project site. The proposed water well and on-site wastewater treatment (septic) system shall be designed, permitted, and constructed in accordance with the requirements of the San Joaquin County Environmental Health Department, including all applicable permit and inspection requirements. The proposed stormwater drainage facilities, including the on-site storm drain basin, shall be designed, permitted, and constructed in accordance with the requirements of the San Joaquin County Department of Public Works, including applicable stormwater design standards and inspection requirements. The fire suppression tank will be reviewed for compliance with the California Fire Code by the Lathrop-Manteca Fire District. Additional site improvements include landscaping and perimeter fencing associated with the proposed industrial operations, which will be reviewed by the Community Development Department for compliance with Development Title requirements and requested modifications.

Implementation of the proposed Project would not require the relocation or substantial expansion of off-site water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities that could result in significant environmental effects. Utility improvements necessary to serve the proposed Project would occur within standard industrial development practices and in accordance with applicable County standards and requirements as outlined in Sections 9-600 through 9-610 of San Joaquin County's Development Title.

Water demand generated by the proposed Project would be relatively limited and associated primarily with employee domestic use, landscaping irrigation, truck washing, and incidental operational needs. The proposed Project would utilize a private groundwater well and is not anticipated to substantially affect groundwater availability during normal, dry, or multiple dry years. In addition, the proposed Project would not rely upon a public wastewater treatment provider, as wastewater generated on-site would be treated through a private septic system designed in accordance with applicable County Environmental Health standards.

The proposed Project would also generate only typical construction and operational solid waste volumes associated with industrial development, all of which would be handled and disposed of through waste management providers in compliance with all applicable Federal, State, and local regulations related to solid waste handling, recycling, and disposal. Accordingly, the proposed Project would not exceed local infrastructure capacity, impair attainment of solid waste reduction goals, or require new or expanded public utility infrastructure. Therefore, the proposed Project will have a **Less Than Significant Impact**.

MITIGATION MEASURES:

Mitigation is not required for this topic.

20. WILDFIRE -- Would the project:

	Potentially Significant Impact	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*
If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

IMPACT ANALYSIS

The following discussion is an analysis for criteria (a), (b), (c), and (d):

a. *Would the project* substantially impair an adopted emergency response plan or emergency evacuation plan*?*
b. *Would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
c. *Would the project require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
d. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The Project site is not located within a State Responsibility Area (SRA) and, according to mapping maintained by the California State Fire Marshal and CAL FIRE, is not designated within a Very High Fire Hazard Severity Zone or other high-fire hazard severity area. As previously discussed, construction activities associated with the proposed Project are not anticipated to substantially interfere with emergency vehicle access or evacuation routes, and long-term project operations will not obstruct surrounding roadways or emergency access corridors.

The portion of the Project site to be developed is currently undeveloped and primarily characterized by overgrown grasses and weeds. Development of the site with industrial improvements would reduce the existing on-site fuel load through removal of combustible vegetation and implementation of maintained urban development, including paved surfaces and managed landscaping. In addition, the proposed Project includes installation of private utilities and fire protection infrastructure, including a new on-site water well and fire suppression tank, which would further support fire protection capabilities on-site.

The Project site is located within a relatively flat area and is not traversed by natural drainage channels or steep topographic features. As such, implementation of the proposed Project would not expose people or structures to significant risks associated with post-fire conditions, including downslope flooding, debris flows, landslides, slope instability, or substantial drainage changes resulting from wildfire events in surrounding areas. Accordingly, the proposed Project will have a **Less Than Significant Impact.**

MITIGATION MEASURES:

Mitigation is not required for this topic.

21. MANDATORY FINDINGS OF SIGNIFICANCE

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

IMPACT ANALYSIS

a. *Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

The analysis detailed in this Initial Study covers a broad spectrum of topics relative to the potential for the proposed Project to have environmental impacts; this includes the potential for the proposed Project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce or restrict the number of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Through this analysis, it was found that the proposed Project would have either no impact, a less than significant impact, or a less than significant impact with the implementation of mitigation measures. For the reasons presented throughout this Initial Study, the proposed Project would not substantially degrade the quality of the environment. With the implementation of mitigation measures presented in this Initial Study, the proposed Project will have a **Less Than Significant Impact.**

b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in the connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

As described in this Initial Study, the potential environmental effects of the proposed Project will either be less than significant or will have no impact at all when compared to baseline conditions. Where the proposed Project involves potentially significant effects, these effects would be reduced to a less than significant level with proposed mitigation measures and compliance with required permits and applicable regulations.

The County of San Joaquin's 2035 General Plan and EIR comprehensively account for ongoing and foreseeable urban development within the City's "Planning Area" and the cumulative environmental impacts of planned development. Future urban development in San Joaquin County includes the provision of roads, utilities, schools, and recreational facilities needed to serve County residents and visitors as their demands for urban services increase over time.

The proposed Project will contribute to planned urban development in the County of San Joaquin. The potential environmental impacts associated with the proposed Project represent a portion of the environmental consequences of the planned growth and development permitted by the 2035 General Plan. The proposed Project will involve a minor addition to the potential environmental impacts identified in the 2035 General Plan EIR, but the proposed Project will not result in any substantial contribution to any of the significant cumulative impacts identified in the 2035 General Plan EIR. Thus, the proposed Project will have a **Less Than Significant Impact.**

c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

This Initial Study has considered the potential environmental impacts of the proposed Project in the discrete issue areas outlined in the CEQA Environmental Checklist. During the environmental analysis, the potential for the proposed Project to result in substantial impacts on human beings in these issue areas, as well as the potential for substantial impacts on human beings to occur outside of these issue areas, was considered, and were identified but they were identified to be **Less Than Significant with Mitigation Incorporated**.

REFERENCES

1. San Joaquin County 2035 General Plan, dated December 2016 (GENERAL PLAN 2035.pdf).
2. San Joaquin County 2035 General Plan Draft Environmental Impact Report.
3. San Joaquin County Development Title (Title 9) Development Title | San Joaquin County, CA | Municode Library.
4. Soil Survey of San Joaquin County, California Soil Survey of San Joaquin County, California : United States. Natural Resources Conservation Service : Free Download, Borrow, and Streaming : Internet Archive.
5. San Joaquin County Multi-Jurisdictional Hazard Mitigation Plan 2026 san-joaquin-county-mjhmp-volume-2_draft_public-comment.pdf.
6. San Joaquin County Bicycle Master Plan Update, dated November 2020 final-sjc-bike-plan-update_nov-19_2020-optimized.pdf.
7. California Department of Conservation (DOC). *Important Farmland Finder*. California Department of Conservation, Division of Land Resource Protection.
8. City of Manteca, *Manteca 2043 General Plan.*
9. San Joaquin County Office of Emergency Services (OES). San Joaquin County Emergency Operations Plan, dated 2022.
10. San Joaquin County Office of Emergency Services (OES). San Joaquin County Multi-Jurisdictional Hazard Mitigation Plan, Public Review Draft, dated 2026.
11. Letter from California Valley Miwok Tribe, dated June 11, 2026.
12. San Joaquin Valley Air Pollution Control District (SJVAPCD), Health Risk and Ambient Air Quality Assessment, dated September 10, 2025.

Appendix A

Air Impact Assessment Approval, dated March 14, 2025, as Issued by the San Joaquin Valley Air Pollution Control District

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

March 14, 2025

Ravi Singh
S. Line Transportation, Inc.
890 Bridge Way Circle
El Sobrante, CA 94803

Re: Air Impact Assessment (AIA) Application Approval
ISR Project Number: C-20250055
Land Use Agency: County of San Joaquin
Land Use Agency ID Number: Unknown

Dear Mr. Singh:

The San Joaquin Valley Air Pollution Control District (District) has approved your Air Impact Assessment (AIA) for the S. Line Transportation, Inc. project, located at 11537 E. State Highway 120 in Manteca, California. The project consists of the construction of a truck parking facility consisting of 26 stalls for trucks, a 3,750 square foot shop for truck maintenance, a 625 square foot office, and a 625 square foot storage area for parts. The District has determined that the mitigated baseline emissions for construction and operation will be less than two tons NOx per year and two tons PM10 per year. Pursuant to District Rule 9510 Section 4.3, this project is exempt from the requirements of Section 6.0 (General Mitigation Requirements) and Section 7.0 (Off-site Emission Reduction Fee Calculations and Fee Schedules) of the rule. As such, the District has determined that this project complies with the emission reduction requirements of District Rule 9510 and is not subject to payment of off-site fees. The determination is based on the project construction details provided with the application. Changes in the construction details may result in increased project related emissions and loss of this exemption.

Pursuant to District Rule 9510, Section 8.4, the District is providing you with the following information:

- A notification of AIA approval (this letter)
- A statement of tentative rule compliance (this letter)
- An approved Monitoring and Reporting Schedule

In addition, to maintain this exemption you must comply with all mitigation measures identified in the enclosed Monitoring and Reporting Schedule. Please notify the District of any changes to the project as identified in the approved Air Impact Assessment for this project.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

Change in Developer Form

If all or a portion of the project changes ownership, a completed Change in Developer form must be submitted to the District within thirty (30) days following the date of transfer.

Additional Requirements

- Dust Control Plan. Please be aware that you may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in District Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

- Asbestos Requirements for Demolitions. If demolition is involved, a Certified Asbestos Consultant will need to perform an asbestos survey prior to the demolition of a regulated facility. Following the completion of an asbestos survey; the asbestos survey, Asbestos Notification, Demolition Permit Release, and the proper fees are to be submitted to the District 10 working days prior to the removal of the Regulated Asbestos Containing Material and/or the demolition when no asbestos is present.

- Permits. Per District Rule 2010 (Permits Required), you may be required to obtain a District Authority to Construct prior to installation of equipment that controls or may emit air contaminants, including but not limited to emergency internal combustion engines, boilers, and baghouses.

To identify other District rules or regulations that apply to this project or to obtain information about District rules and permit requirements, the applicant is strongly encouraged to visit www.valleyair.org or contact the District's Small Business Assistance office nearest you:

Fresno office:	(559) 230-5888
Modesto office:	(209) 557-6446
Bakersfield office:	(661) 392-5665

Thank you for your cooperation in this matter. Please note the District also issued a letter to the land-use agency notifying the agency of this AIA approval. If you have any questions, please contact Mr. Dylan C Casares by telephone at (559) 230-6574 or by email at dylan.casares@valleyair.org.

Sincerely,

Tom Jordan
Director of Policy and Government Affairs



For: Mark Montelongo
Program Manager

Enclosures

cc: Maria Spera
Dirk Poeschel Land Development Services, Inc.
923 Van Ness Avenue
Fresno, CA 93721
maria@dplds.com

Indirect Source Review
Complete Project Summary Sheet & Monitoring and Reporting Schedule

Project Name:	**S. LINE TRANSPORTATION, INC.**
Applicant Name:	**S. LINE TRANSPORTATION, INC.**
Project Location:	**11537 E. STATE HIGHWAY 120 COMCOREX RD. & HART LN. APN(s): 208-180-02**
Project Description:	**LAND USE: Other - 16 Acres - Other Other - 16 Acres - Other ACREAGE: 16.52**
ISR Project ID Number:	**C-20250055**
Applicant ID Number:	**C-304062**
Permitting Public Agency:	**COUNTY OF SAN JOAQUIN**
Public Agency Permit No.	**UNKNOWN**

Existing Emission Reduction Measures

Enforcing Agency	Measure	Quantification	Notes

There are no Existing Measures for this project.

Non-District Enforced Emission Reduction Measures

Enforcing Agency	Measure	Specific Implementation	Source Of Requirements

There are no Non-District Enforced Measures for this project.

District Enforced Emission Reduction Measures

Enforcing Agency	Measure	Specific Implementation	Measure For Compliance	District Review
SJVAPCD	Construction and Operation - Recordkeeping	For each project phase, all records shall be maintained on site during construction and for a period of ten years following either the end of construction or the issuance of the first certificate of occupancy, whichever is later. Records shall be made available for District inspection upon request.	(Compliance Dept. Review)	
SJVAPCD	Construction and Operational Dates	For each project phase, maintain records of (1) the construction start and end dates and (2) the date of issuance of the first certificate of occupancy, if applicable.	(Compliance Dept. Review)	

(District Enforced Emission Reduction Measures Continued)

Enforcing Agency	Measure	Specific Implementation	Measure For Compliance	District Review
SJVAPCD	Construction and Operation - Exempt from Off-site Fee	For each project phase, within 30-days of issuance of the first certificate of occupancy, if applicable, submit to the District a summary report of the construction start, and end dates, and the date of issuance of the first certificate of occupancy. Otherwise, submit to the District a summary report of the construction start and end dates within 30-days of the end of each phase of construction.	(Compliance Dept. Review)	

Number of District Enforced Measures: 3

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

Indirect Source Review (ISR) - Air Impact Assessment (AIA) Application

A. Applicant Information

Applicant/Business Name: S. Line Transportation, Inc.			
Mailing Address: 890 Bridge Way Circle	City: El Sobrante	State: CA	Zip: 94803
Contact: Ravi Singh	Title: Co-Owner		
Is the Applicant a licensed state contractor? ■ No ☐ Yes, please provide State License number:			
Phone: 510-701-2148	Email: ravi@slinetransport.com		

B. Agent Information (if applicable)

Agent/Business Name: Dirk Poeschel Land Development Services, Inc.			
Mailing Address: 923 Van Ness Ave.	City: Fresno	State: CA	Zip: 93721
Contact: Maria Spera	Title: Associate Planner		
Phone: 559-445-0374 ext. 2	Email: maria@dplds.com		

C. Project Information

Project Name: S. Line Transportation, Inc.			
Project Location	Street: 11537 E. State Highway 120	City: Manteca	Zip: 95336
Cross Streets: Comcorex Rd. & Hart Ln.		County: San Joaquin	
Permitting Agency: San Joaquin County	Planner: Megan Aguirre	Contact Number: 209-468-3144	
Permit Type and Number (if known):			
Subject to Project-Level Discretionary Approval? ■ Yes ☐ No		Last Project-Level Discretionary Approval Date: TBD Last Project-Level Ministerial Approval Date: TBD	

D. Project Description

Please briefly describe the project (e.g.: 300 multi-family residential units apartments or 6 miles road widening):

The applicant proposes a 26 stall truck parking facility for a long haul trucking company which will consist of a 3,750 sq. ft. shop for minor truck maintenance, a 625 sq. ft. office space, and a 625 sq. ft. parts storage area.

For **Residential/Non-Residential/Mixed-Use** please check the box next to each applicable land use below:

☐ Commercial / Retail ☐ Educational ☐ Office ☐ Warehouse
☐ Residential ☐ Government ■ Industrial ☐ Distribution Center
☐ Recreational (e.g. park) ☐ Medical ☐ Manufacturing ☐ Other: ____

For **Transportation/Transit** please check the box next to each applicable land use below:

☐ New Road Construction ☐ Expansion to an Existing Road ☐ Bridge / Overpass ☐ Interchange or Intersection Improvements

Select land use setting: ☐ Urban ■ Rural

E. Notice of Violation

Is this application being submitted as a result of receiving a Notice of Violation (NOV)? ■ No ☐ Yes, NOV #:

FOR DISTRICT USE ONLY

Filing Fee Received: _____ Date Paid: _____ Applicant #: **C-304062**	Check #: _____ Project #: **C-20250055**	Date Stamp: Finance	Date Stamp: Permit Received 2/5/2025 SJVAPCD Permit Services

F. Voluntary Emission Reduction Agreement (VERA)

Is this project part of a larger project for which there is a VERA with the District? ■ No ☐ Yes, VERA #:

G. Optional Section

Do you want to receive information about the Healthy Air Living Business Partners Program? ■ No ☐ Yes

H. Parcel and Land Owner Information

	APN (000-000-00 Format)	Gross Acres	Land Owner
1.	208-180-02	16.52	Stanley & Tracy Vander Veen
2.			
3.			

Additional sheets for listing APN numbers can be found on the District's website at www.valleyair.org/ISR.

I. Project Development and Operation

Will the project require demolition of existing structures?	☐ Yes, *complete J*
	■ No, *complete K*

J. Demolition

Total square feet of building(s) footprint to be demolished:	Number of Building Stories:
Demolition Start Date (Month/Year):	Number of Days for Demolition:

K. Timing

Expected number of work days per week during construction? ■ 5 days ☐ 6 days ☐ 7 days	
For **Transportation/Transit** projects, *please complete L-1*	
For **Residential/Non-Residential/Mixed-Use** projects, will it be developed in multiple phases?	■ No, *complete L-2*
	☐ Yes, *complete L-3*

L-1. Transportation / Transit Development and Timing Details

Please note that development timelines provided within this section should reflect actual work time, and should not account for possible project delays.

Start of Construction (Month/Year):	End of Construction (Month/Year):
Number of actual construction days:	
Length of road being constructed: miles	Width of road being constructed: feet
Predominant Soil Type (choose one): ☐ Sand Gravel ☐ Weathered Rock – Earth ☐ Blasted Rock	
Amount of soil imported: cubic yards	Amount of soil exported: cubic yards
Amount of asphalt imported: cubic yards	Amount of asphalt exported: cubic yards
Total area to be disturbed: acres	Maximum area disturbed per day: acres
Average truck capacity: cubic yards	Will water trucks be used? ☐ Yes ☐ No

L-2. Single Phase Development

Start of Construction (Month/Year): May 2025	Gross Acres: 16.52 Ac.
End of Construction (Month/Year): August 2025	Net Acres (area devoted to buildings/structures): maria@dplds.c
First Date of Occupation (Month/Year): September 2025	Paved Parking Area (# of Spaces): 40
Building Square Footage: 5,000 sq. ft.	Number of Dwelling Units: 1

L-3. Phased Site Development and Building Construction

In addition to the information below you can submit phase specific activity timeline found on District's website at www.valleyair.org/ISR.

1	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
2	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:

3	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
4	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
Additional sheets for phasing information can be found on the District's website at www.valleyair.org/ISR.		

M. On-Site Emission Reduction Measures (Mitigation Measures)

Listed below are categories of possible mitigation measures for applicants to implement that will reduce a project's impact on air quality. Check "Yes" next to any measure that will be utilized for this project, and please complete the corresponding page in this form to identify specifics related to that measure. If a category is not applicable to the project, check "No" and provide justification for not selecting the measure. Also, the applicant is encouraged to provide any mitigation measures including supporting documentation that are not listed on this application form for District consideration. For reference, see www.valleyair.org/ISR for potential additional mitigation measures.

Clean Construction Fleet Mitgation Measure below can be selected for all development types

1. Clean Construction Fleet (Note: Making a commitment to using less polluting construction equipment)
- [x] Yes, *please complete mitigation measure 1 below*
- [ ] No, *please provide justification why not selected:*

Operational Mitgation Measure below can be selected for all development types, except for transportation and transit projects

2. Clean On-Road Trucks (e.g. Heavy Duty Trucks, Medium Duty Trucks, and Light Duty Trucks)
Note: Operational fleet will use zero and/or near-zero emissions for all or part of its activities.
- [x] Yes, *please complete applicable mitigation measure 2a through 2c below*
- [ ] No, *please provide justification why not selected:*

3. On-Site Zero Emission Off-Road Vehicles and Equipment (e.g. electric forklifts and electric yard trucks)
- [ ] Yes, *please complete applicable mitigation measure 3 below*
- [x] No, *please provide justification why not selected:* Typical off-road vehicles & equipment will be used.

4. Solar Panels (e.g. incorporate solar panels in the project)
- [ ] Yes, *please complete applicable mitigation measure 4 below*
- [x] No, *please provide justification why not selected:* The project will be served by on-site power supply.

5. Electric Vehicle (EV) Chargers (e.g. incorporate onsite EV charging infrastructure)
- [ ] Yes, *please complete applicable mitigation measure 5 below*
- [x] No, *please provide justification why not selected:* There will be no electric vehicle usage on the property.

6. Clean Lawn and Garden Equipment (e.g. eletric mowers, electric leaf blowers, electric trimmers, etc.)
- [ ] Yes, *please complete applicable mitigation measure 6 below*
- [x] No, *please provide justification why not selected:* Landscaping will be conducted by contracted landscaping company.

7. Land Use/Location (e.g. increased residential density, increase job density, etc.) Not applicable for rural settings.
- [ ] Yes, *please complete applicable mitigation measures 7a through 7c below*
- [x] No, *please provide justification why not selected:* No residential project is being proposed.

8. Parking Policy/Pricing (e.g. unbundle residential parking costs, limit residential parking supply, etc.) Not applicable for rural settings.
- [ ] Yes, *please complete applicable mitigation measure 8a through 8d below*
- [x] No, *please provide justification why not selected:* Not applicable for the proposed project.

9. Commute Trip Reduction Programs (e.g. workplace parking charge, provide ridesharing program, etc.) Not applicable for rural settings.
- [ ] Yes, *please complete applicable mitigation measures 9a through 9c below*
- [x] No, *please provide justification why not selected:* The project will provide the number of parking stalls required by San Joaquin County.

10. Exceed Title 24 (e.g. exceed California Title 24 required energy efficiency for building(s) associated with the project)
- [ ] Yes, *please complete applicable mitigation measure 10 below*
- [x] No, *please provide justification why not selected:* The project will meet Title 24 standards.

N. Review Period

You may request a five (5) day period to review a draft of the District's analysis of your project before it is finalized. However, if you choose this option, it will delay the project's finalization by five (5) business days.

☐ I request to review a draft of the District's analysis.

O. Fee Deferral Schedule

If the project's on-site air pollution reductions (mitigation measure) insufficiently reduced air pollution as outlined in Rule 9510, an off-site fee is assessed based on the excess air pollution. The money collected from this fee will be used by the District to reduce air pollution emissions 'off-site' on behalf of the project.

An Applicant may request a deferral of all or part of the 'off-site' fees up to, but not to exceed, the start date of construction. The start of construction is any of the following, whichever occcurs first: start of grading, start of demolition, or any other site development activities not mentioned above.

☐ I request a Fee Deferral Schedule, and have enclosed the Fee Deferral Schedule Application.

The Fee Deferral Schedule Application, can be found on the District's website at www.valleyair.org/ISR.

P. Change of Project Developer

The Applicant assumes all responsibility for ISR compliance for this project. If the project developer changes, the Applicant must notify the Buyer, and both Buyer and Applicant must file a 'Change of Project Developer' form with the District. If there is a change of project developer, and a 'Change of Project Developer' form is not filed with the District, the Applicant will remain liable for ISR compliance.

The Change of Project Developer form can be found on the District's website at www.valleyair.org/ISR.

Q. Attachments

Required:	*If applicable:*
■ Tract Map or Project Design Map	■ Letter from Applicant granting Agent authorization
■ Vicinity Map	☐ Fee Deferral Schedule Application
■ Application Filing Fee $841.00 for mixed use / non-residential / transporation / transit projects **OR** $562.00 for residential projects only	☐ Monitoring & Reporting Schedule ☐ Supporting documentation for selected Mitigation Measures

R. Certification Statement

I certify that I have reviewed and completed the entire application and hereby attest that the information relayed within is true and correct to the best of my knowledge. I commit to implementation of those on-site mitigation measures that I have selected above. I am responsible for notifying the District if I will be unable to implement these mitigation measures. If a committed mitigation measure is not implemented, the project may be re-assessed for air quality impacts.

(An authorized Agent may sign the form in lieu of the Applicant if an authorization letter signed by the Applicant is provided).

Name (printed): SUKHBINDER S SIDHU	Title: PRESIDENT
Signature:	Date: 02/04/2025

Mitigation Measures

Mitigation Measure 1: Construction Clean Fleet

Will the project use a construction clean fleet to achieve the emission reductions required by District Rule 9510?
(By checking "yes" the Applicant is commiting to achieving the following emission reduction requirements: 20% for NOx and 45% for PM10 compared to the statewide average.)

☐ No, *please complete justification in Section M above*
■ Yes*, *please be aware of the requirements below:*

***If yes,** daily records of the total hours of operation for each piece of equipment greater than 50-horsepower being used on the project site during construction must be maintained. Within 30-days of completing construction of each project phase, a report summarizing total hours of operation by equipment type, equipment model year and horsepower for each piece of construction equipment greater than 50-horsepower must be submitted to the District. To assist in this recordkeeping, the *Construction Clean Fleet Data Template* is available on the District's website at www.valleyair.org/ISR.

Please note: if the required construction emission reductions under Rule 9510 cannot be achieved, fees are required in order to mitigate the remaining balance of emissions. For each project phase, the District will verify that the fleet details achieved the required emission reductions

Mitigation Measure 2a: Clean On-Road Heavy Duty Trucks

Will the project use any operational clean Heavy Duty Trucks (On-road vehicles with a gross vehicle weight greater than 26,000 pounds)?
For example, zero-emission electric trucks and/or near-zero emission trucks meeting CARBs established emission standard of 0.02 g/bhp-hr NOx.

☐ No, *please complete justification in Section M above*
■ Yes*, *please complete section below:*

1. Number of trucks for Project: 26

zero emission trucks: 0	**near-zero** emission trucks: 0	**other types** of trucks: 26

2. Trip length in miles each of the following types of trucks will travel one way for the Project:

zero emission trucks: 0	**near-zero** emission trucks: 0	**other types** of trucks: Varies

3. Expected number of one-way trips per year for each of the following types of trucks for the Project:

zero emission trucks: 0	**near-zero** emission trucks: 0	**other types** of trucks: Varies

***If yes,** by selecting this measure there will be a condition placed on the monitoring and reporting schedule to ensure compliance. Records of the fleet data, including truck type, will be required to be submitted to the District on an annual basis.

Please note: by selecting this measure, you are certifying to the District that the above operational clean fleet vehicles have not been funded by state or District grant programs.

Mitigation Measure 2b: Clean On-Road Medium Duty Vehicles

Will the project use any operational clean Medium Duty Vehicles (On-road vehicles with a gross vehicle weight between 14,001 pounds and 26,000 pounds)?
For example, zero-emission electric vehicles, zero emission last mile delivery trucks or vans and/or near-zero emission vehicles meeting CARB's established emission standard of 0.02 g/bhp-hr NOx.

■ No, *please complete justification in Section M above*
☐ Yes*, *please complete section below:*

1. Number of trucks for Project:

zero emission trucks: _____	**near-zero** emission trucks: _____	**other types** of trucks: _____

2. Trip length in miles each of the following types of trucks will travel one way for the Project:

zero emission trucks: _____	**near-zero** emission trucks: _____	**other types** of trucks: _____

3. Expected number of one-way trips per year for each of the following types of trucks for the Project:

zero emission trucks: _____	**near-zero** emission trucks: _____	**other types** of trucks: _____

***If yes,** by selecting this measure there will be a condition placed on the monitoring and reporting schedule to ensure compliance. Records of the fleet data, including truck type, will be required to be submitted to the District on an annual basis.

Please note: by selecting this measure, you are certifying to the District that the above operational clean fleet vehicles have not been funded by state or District grant programs.

Mitigation Measure 2c: Clean On-Road Light Duty Vehicles

Will the project use any operational clean Light Duty Vehicles (On-road vehicles with a gross vehicle weight below 14,000 pounds)? For example, zero-emission electric vehicles, zero emission last mile delivery trucks or vans and/or near-zero emission vehicles meeting CARBs established emission standard of 0.02 g/bhp-hr NOx.

☒ No, *please complete justification in Section M above*

☐ Yes*, *please complete section below:*

1. Number of trucks for Project:

zero emission trucks: _____	**near-zero** emission trucks: _____	**other types** of trucks: _____

2. Trip length in miles each of the following types of trucks will travel one way for the Project:

zero emission trucks: _____	**near-zero** emission trucks: _____	**other types** of trucks: _____

3. Expected number of one-way trips per year for each of the following types of trucks for the Project:

zero emission trucks: _____	**near-zero** emission trucks: _____	**other types** of trucks: _____

***If yes**, by selecting this measure there will be a condition placed on the monitoring and reporting schedule to ensure compliance. Records of the fleet data, including truck type, will be required to be submitted to the District on an annual basis.

Please note: by selecting this measure, you are certifying to the District that the above operational clean fleet vehicles have not been funded by state or District grant programs.

Mitigation Measure 3: On-Site Zero Emission Off-Road Vehicles and Equipment

Will the project use any operational on-site zero emission Off-Road Vehicles and Equipment? (e.g. electric forklifts, electric yard trucks, electric aerial lifts)

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

Type of Zero Emission Vehicles and Equipment	No. of Vehicles and Equipment	Hours/Day	Days/Year	Horsepower	Fuel Type (Hydrogen or Electric)
1. Yard Truck					
2. Forklifts					
3. Aerial Lifts					
4. Other Equipment					

Please note: by selecting this measure, you are certifying to the District that the above operational off-road vehicles have not been funded by state or District grant programs.

Additional sheets for listing On-Site Zero Emission Vehicles/Equipment can be found on the District's website at www.valleyair.org/ISR.

Mitigation Measure 4: Solar Panels

Will the project include the installation of solar panels?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Total power output of solar panels to be installed: _____ kW *(e.g.: 200 homes x 3kW=600kW.)*
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, *(note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 5: Electric Vehicle (EV) Chargers

Will the project include the installation of electric vehicle (EV) charger(s)?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Number of charging outlet(s) to be installed *(Note: a charger may have one or more charging outlets)*: _____
- Charging level (e.g.: Level 1, Level 2, or DC Fast Charge): _____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, *(note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 6: Clean Landscape Equipment

Will the project utilize zero-emission landscaping equipment? (e.g. electric lawn mowers, electric leaf blowers, etc.) This measure requires that 100% of the landscape equipment be zero emissions.

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Documentation: Please attach supporting documentation. ☐ Attached

Mitigation Measure 7a: Increase Residential Density

Will the project have a residential density above 9.1 du/acre.? Density is measured in terms of dwelling units per acre.

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

Residential Density is the 'Number of Dwelling Units' for the project, divided by the total gross acres of the project.	**Dwelling Units per Acre:**_____

- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Documentation: Please attach supporting documentation (e.g.: map) to justify the provided residential density. ☐ Attached

Mitigation Measure 7b: Increase Job Density

Will the project have a higher density of jobs above 145 jobs per acre? Job density is the number of jobs per acre.

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

Job Density is the 'Number of Job' created by the project, divided by the total gross acres of the project.	**Jobs per Acre:**

- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Documentation: Please attach supporting documentation (e.g.: map) to justify the jobs per acre. ☐ Attached

Mitigation measure 7c: Integrate Below Market Rate Housing

Will the project require all or a portion of the multifamily residential units designated as affordable deed-restricted below-market-rate (BMR) housing?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Percentage of multifamily units permanently dedicated as affordable: _____%
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Documentation: Please attach supporting documentation to justify all or a portion of the multifamily residential units that are designated as deed-restricted below-market-rate housing. ☐ Attached

Mitigation Measure 8a: Limit Residential Parking Supply

Will the residential project reduce the total supply of available/allowable parking spaces?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Number of available/allowable parking spaces for the project (ie parking demand): _____
- Number of parking spaces the project will provide: _____ (this value must be less than the demand entered above)
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 8b: Unbundle Residential Parking Cost

Will the residential project provide the residents the option to purchase a parking space at an additional cost?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Annual parking cost per space ($):_____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 8c: Transit Subsidy

Will the project provide subsidized/discounted daily or monthly public transit passes?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Average transit fare without subsidy amount ($):_____
- Subsidy amount ($):_____ (Subsidy amount can be fare-per-ride or the cost of a monthly pass)
- % of employees /residents eligible for subsidy: _____
- % of transit mode share of work trips: _____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 8d: Implement Employee Parking "Cash-Out"

Will the project require employers to offer employee parking "cash-out"?
The term "cash-out" is used to describe the employer providing employees with a choice of forgoing their current subsidized/free parking for a cash payment.

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- % of employees eligible to receive "cash-out": _____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 9a: Workplace Parking Charge

Will the project implement workplace parking pricing at its employment centers (e.g., explicitly charging for parking for its employees, not providing employee parking and transportation allowances, educating employees about available alternatives)?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Baseline parking price per space ($):_____ (If unknown, please enter 25% of proposed parking price per space)
- Proposed parking price per space ($):_____
- % of employees paying for parking: _____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 9b: Market Commute Trip Reduction Option

Will the project implement marketing strategies to reduce commute trips (e.g., Onsite or online commuter information services, Onsite or online transit pass sales, employee transportation coordinators, guaranteed ride home services)?
This measure should promote and educate employees on alternative transportation options

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- % of Employees Eligible: _____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 9c: Provide Ridesharing Program

Will the project include a ride-sharing program?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- % of Employees eligible for the ride-sharing program: _____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Mitigation Measure 10: Exceed Title 24

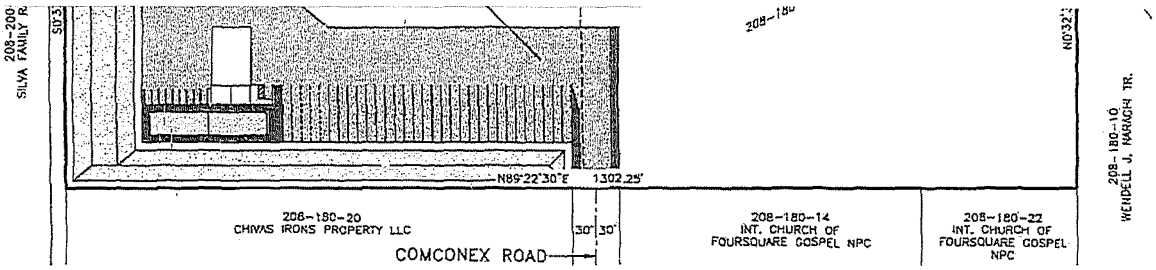
Will the energy efficiency rating of the project's building(s) be greater than California Title 24 requirements?

☒ No, *please complete justification in Section M above*

☐ Yes, *please complete section below:*

- Percent of increase greater than California Title 24 requirements: _____
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - ☐ No, (*note: if checked "no" this mitigation measure will require District enforcement)*
  - ☐ Yes, Name of enforcing agency: _____
    Source of Requirement: _____

Documentation: Please attach relevant analysis or summary pages of Title 24 documentation. ☐ Attached



NORTH

OVERALL PROPERTY ENTITLEMENT SITE PLAN

SCALE: 1"=100'

PROPOSED STRUCTURE

OFFICE: 625 S.F.
SHOP: 5,000 S.F.
PARTS: 625 S.F.

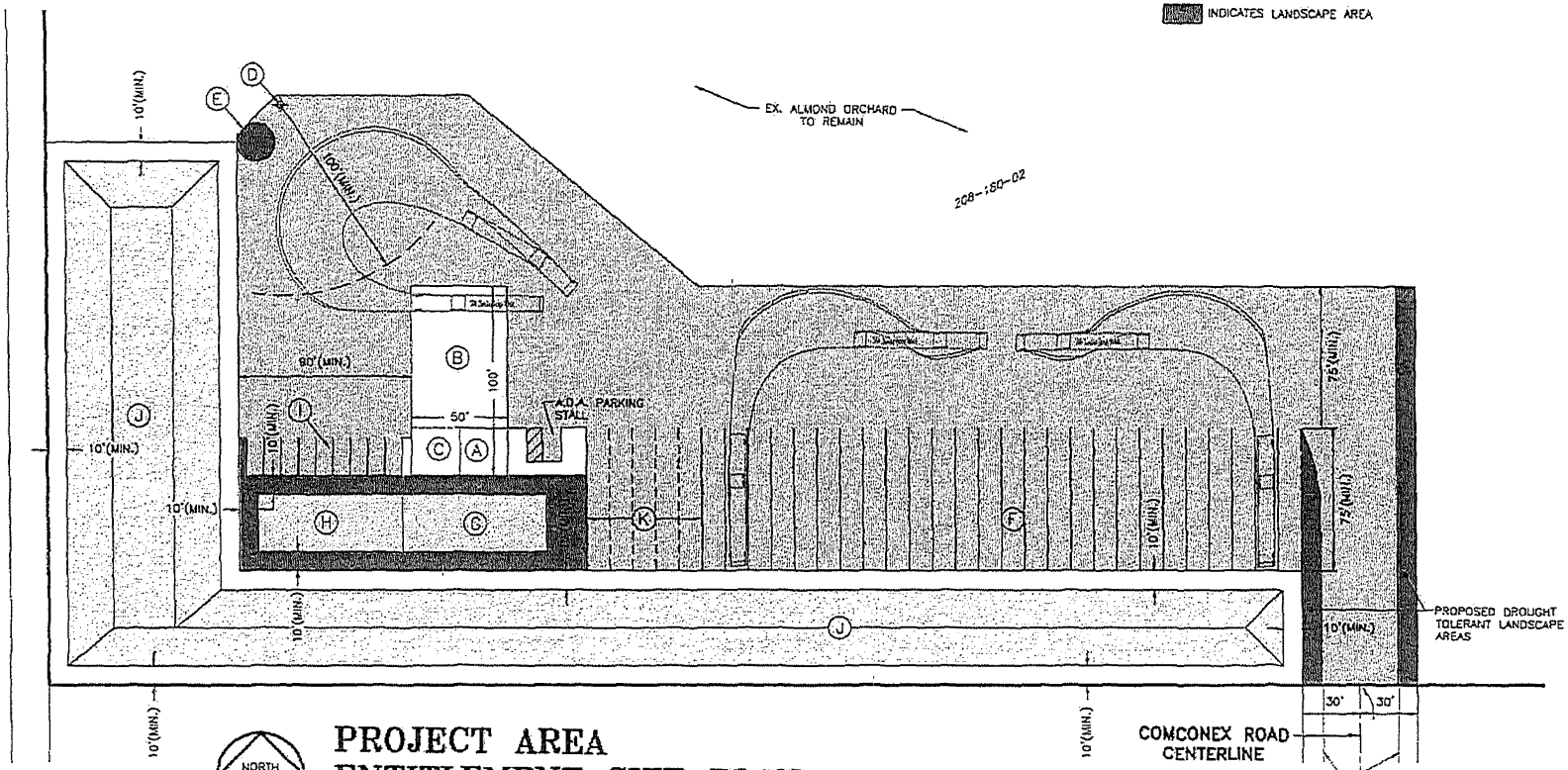
REGISTERED PROFESSIONAL ENGINEER
JOSHUA COOK ELSON
No. C58912
STATE OF CALIFORNIA

LEGEND

A) OFFICE 25'X25' (625 S.F.)
B) SHOP 50'X75' (3,750 S.F.)
C) PARTS STORAGE 25'X25' (625 S.F.)
D) PROPOSED WELL
E) PROPOSED STATIC FIRE WATER SUPPRESSION TANK
F) 26-12'X75' TRUCK AND TRAILER PARKING STALLS
G) 3,000 S.F. FILTER BED SEPTIC SYSTEM
H) 3,000 S.F. FILTER BED SEPTIC SYSTEM 100% REPLACEMENT AREA
I) 9-9'X20' AUTO PARKING STALLS
J) STORM DRAIN RETENTION BASIN (FIVE FEET DEEP)
K) 5-12'X75' TRUCK PARKING REPAIR STAGING AREA

INDICATES A.C. PAVEMENT SURFACE

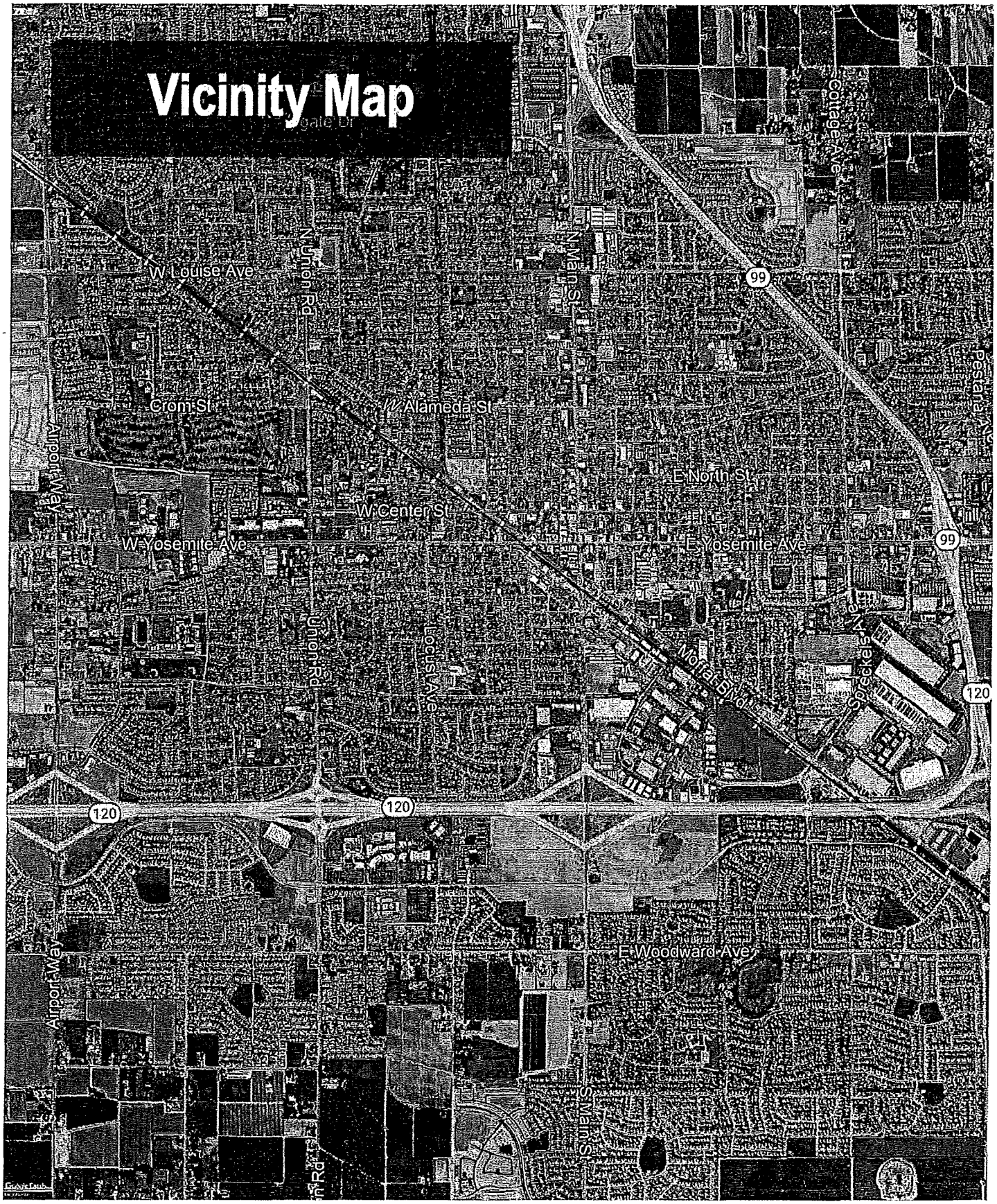
INDICATES LANDSCAPE AREA



NORTH

PROJECT AREA ENTITLEMENT SITE PLAN

SCALE: 1"=40'


Vicinity Map
W Louise Ave
N Union Rd
N Main St
Cottage Way
99
Crom St
W Alameda St
Airport Way
E North St
W Center St
W Yosemite Ave
E Yosemite Ave
99
Union Rd
Locust Ave
Motel Dr
120
120
120
Airport Way
E Woodward Ave
S Main St

Appendix B

Health Risk and Ambient Air Quality Assessment, dated August 29, 2024, prepared by JK Consulting Group, LLC

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

September 10, 2025

County of San Joaquin
Community Development
1810 East Hazelton Avenue
Stockton, CA 95205

Project: Health Risk and Ambient Air Quality Assessment for S. Line Transportation, Inc.
District CEQA Reference No: 20251030

To Whom It May Concern:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Health Risk and Ambient Air Quality Assessment for the S. Line Transportation, Inc. Project. The proposed project consists of the construction of a truck parking facility consisting of 26 stalls for trucks, a 3,750 square foot shop for truck maintenance, a 625 square foot office, and a 625 square foot storage area for parts (Project). The Project is located at 11537 East State Highway 120 in Manteca, CA.

The District has reviewed the prioritization for the Project and determined that it is not expected to have a significant health impact on nearby sensitive receptors.

District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please contact Dylan Casares by e-mail at Dylan.Casares@valleyair.org or by phone at (559) 230-6574.

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs

For: Daniel Martinez
Program Manager

Cc: Maria Spera
Land Development Services, Inc.
923 Van Ness Avenue, Suite 200
Fresno, CA 93721
maria@dplds.com

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

Printed on recycled paper.

August 29, 2024

Ravi Singh
S Line Transportation, Inc.
890 Bridgeway Circle
El Sobrante, CA 94803
510-701-2148 / ravi@slinetransport.com

RE: Health Risk and Ambient Air Quality Assessment for Trucking Operation

Ravi Singh:

JK Consulting Group prepared the following Health Risk and Ambient Air Quality Assessment for the proposed S. Line Transportation, Inc. Trucking Operation (Project) located in Manteca, CA. The Project, located off of State Route (SR) 120 near SR 99 and Interstate (I) 5, seeks to relocate its long-haul trucking company from Oakland, California to Manteca, California which will result in lower vehicle miles traveled (VMT) given the proximity to major freeway corridors. There is typically a maximum of 20 trucks parked on site for a couple of days which allows for as needed routine maintenance. The Project location and site plan are depicted in Figures 1, 2, and 3.

AIR QUALITY

Air quality in a region is determined by the region's topography, meteorology, and existing air pollutant sources. These factors are discussed below, along with the current regulatory structure that applies to the San Joaquin Valley Air Basin (SJVAB), which encompasses the Project site, pursuant to the regulatory authority of the San Joaquin Valley Air Pollution Control District (SJVAPCD).

Climate and Meteorology

Air quality is affected by the rate and location of pollutant emissions and by climatic conditions that influence the movement and dispersion of pollutants. Atmospheric conditions, such as wind speed, wind direction and air temperature gradients, along with local and regional topography, mediate the relationship between air pollutant emissions and air quality. As noted above, the Project is located within the SJVAB, which includes Fresno, Kern (western portion), Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare counties.

The SJVAB is approximately 250 miles long and 35 miles in width and is bordered by the Coast Range Mountains on the west, the Sierra Nevada mountains on the east, and the Tehachapi Mountains to the south. Marine air, which often enters the Basin from the San Joaquin River Delta, causes the wind patterns found inside the SJVAB. The Tehachapi Mountains block airflow in from the south, the Coastal Range blocks wind entry into the Valley from the west, and the tall Sierra Nevada Mountain Range acts as a formidable barrier to the east. Weak airflow caused by these topographical factors is vertically constrained by high atmospheric pressure above the Valley. The SJVAB is hence extremely vulnerable to

pollutant buildup over time. The majority of the mountains in the area are higher than summer inversion layers.

The SJVAB has a Mediterranean climate, which is characterized by infrequent rainfall and hot, dry summers. The SJVAB offers ideal ozone generation conditions given an average of 260 sunny days per year. Precipitation and fog in the Winter create optimal circumstances for particulate matter generation, even though they shield sunlight and reduce ozone levels.

Sources of Air Pollution

Air pollutant emissions in the SJVAB are generally caused by man-made sources, which encompass stationary and mobile sources. Stationary sources include point sources which are generally identified by an exhaust vent or stack (i.e., boilers). Area sources, such as residential and commercial water heaters, lawn mowers, and agricultural fields, are also categorized as stationary sources. Emissions from motor vehicles are characterized as mobile sources and include on-road (i.e., automobiles, trucks) and off-road (i.e., aircrafts, ships, trains) sources. Air pollutants can also be generated by natural means, such as the suspending of fine dust particles via high winds.

Toxic Air Contaminants

Toxic Air Contaminants (TACs) refer to a broad category of air pollutants that could result in an increase in fatalities or serious illnesses, potential risk to human health, or any combination of these. TACs are both organic and inorganic chemical substances that can be released from a range of everyday sources, such as gasoline stations, automobiles, dry cleaners, industrial operations, painting operations, and research and educational facilities. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Non-carcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur.

Most of the estimated health risk from TACs, according to the California Air Resources Board's (CARB) *California Almanac of Emissions and Air Quality* (2005), can be attributable to a small number of compounds. The most significant of which is PM from diesel-fueled engines, which is known as diesel particulate matter (DPM). Diesel exhaust has hundreds of different gaseous and particulate components, many of which are harmful, and has been classified as a human carcinogen. Diesel particles are so small that they penetrate deep into the lungs. According to studies, diesel PM concentrations are significantly greater near busy intersections and roads. The CARB's *Air Quality and Land Use Handbook* (2005) provides recommendations for siting new sensitive land uses within proximity to facilities known to generate TACs, as depicted in Table 1.

Table 1 provides recommendations for the siting of new sensitive land uses near various source categories (i.e. gasoline dispensing facilities) presented in the table. It should be noted that the recommendations are advisory, as noted in the footnotes of Table 1, and would not supersede site-specific analysis which

determines the actual risk from a particular facility. Project related air quality impacts are analyzed and discussed below.

Acute diesel exhaust exposure may irritate the eyes, nose, throat, and lungs, as well as certain neurological consequences like lightheadedness. A cough or nausea may also be brought on by acute exposure, which can potentially make asthma worse. Experimental animal inhalation studies with chronic exposure have revealed a variety of dose-dependent lung cellular alterations, lung inflammation, and immunological consequences from diesel exhaust. There is substantial data, based on both human and laboratory studies, showing diesel exhaust is almost certainly carcinogenic. Studies on human epidemiology show a link between occupational exposure to diesel exhaust and a higher incidence of lung cancer.

REGULATORY SETTING

Federal

The US Environmental Protection Agency (EPA) is the federal agency with significant influence on air quality policy and initiatives. The EPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) describing a strategy for the means to attain the federal standards for ozone and particulate matter. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs.

Clean Air Act

The Federal Clean Air Act, as amended, establishes the National Ambient Air Quality Standards (NAAQS) for several pollutants. These standards are divided into primary standards and secondary standards. Primary standards are designed to protect public health, and secondary standards are intended to protect public welfare from effects such as visibility reduction, soiling, nuisance, and other forms of damage. The Clean Air Act requires that regional plans be prepared for nonattainment areas that illustrate how the federal air quality standards could be met.

Regulation of TACs is achieved through federal and state controls on individual sources. The 1990 Clean Air Act Amendments offered a comprehensive plan for achieving significant reduction in both mobile and stationary source emissions of certain designated hazardous air pollutants, with a goal of achieving the EPA's one in 1 million cancer risk from TACs.

1990 Amendments to the Federal Clean Air Act

The 1990 amendments to the federal Clean Air Act included a provision to address air toxics. Under Title III of the federal Clean Air Act, the U.S. EPA establishes and enforces National Emission Standards for Hazardous Air Pollutants, which are national uniform standards oriented toward controlling particular hazardous air pollutants. Section 112(b) of the federal Clean Air Act identifies 189 "Air Toxics" (hazardous

air pollutants), directs U.S. EPA to identify sources of the 189 pollutants, and establishes a 10-year time period for the U.S. EPA to issue technology-based emissions standards for each source category. Title III of the federal Clean Air Act provides for a second phase under which the U.S. EPA is to assess residual risk after the implementation of the first phase of standards and impose new standards, when appropriate, to protect public health.

State

The State of California Air Resources Board (CARB) sets the laws and regulations for air quality on the state level. In this capacity, CARB conducts research and sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB also establishes emissions standards for motor vehicles sold in California, consumer products (i.e., hairspray, aerosol paints), and various types of commercial equipment.

California Clean Air Act

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code Section 39000 et seq.) and amended in 1992. The CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. Air basins or areas that exceed the CAAQS are designated non-attainment until compliance is disclosed in an attainment plan. In California, CARB is responsible for meeting the State requirements of the federal CAA, administering the California CAA, and establishing the California ambient air quality standards (CAAQS). The California CAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level.

Regional

The SJVAPCD is the agency responsible for monitoring and regulating air pollutant emissions from stationary, area, and indirect sources within San Joaquin County and throughout the SJVAB. The SJVAPCD also has responsibility for monitoring air quality and setting and enforcing limits for source emissions. CARB is the agency with the legal responsibility for regulating mobile source emissions. The SJVAPCD is precluded from such activities under State law.

District Regulation VIII (Fugitive PM10 Prohibition)

The purpose of Regulation VIII (Reg. VIII) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. Reg. VIII requires property owners, contractors, developers, equipment operators, farmers and public agencies to control fugitive dust emissions from specified outdoor fugitive dust sources. It specifies the following measures to control fugitive dust:

- Apply water to unpaved surfaces and area

- Use non-toxic chemical or organic dust suppressants on unpaved roads and traffic areas
- Limit or reduce vehicle speed on unpaved roads and traffic areas
- Maintain areas in a stabilized condition by restricting vehicle access
- Install wind barriers
- During high winds, cease outdoor activities that disturb the soil.
- Keep bulk materials sufficiently wet when handling
- Store and handle materials in a three-sided structure
- When storing bulk materials, apply water to the surface or cover the storage pile with a tarp
- Don't overload haul trucks. Overloaded trucks are likely to spill bulk materials
- Cover haul trucks with a tarp or other suitable cover. Or, wet the top of the load enough to limit visible dust emissions
- Clean the interior of cargo compartments on emptied haul trucks prior to leaving a site
- Prevent trackout by installing a trackout control device
- Clean up trackout at least once a day. If along a busy road or highway, clean up trackout immediately
- Monitor dust-generating activities and implement appropriate measures for maximum dust control

Regulation of TACs is achieved through federal and state controls on individual sources. The 1990 Clean Air Act Amendments offered a comprehensive plan for achieving significant reduction in both mobile and stationary source emissions of certain designated hazardous air pollutants, with a goal of achieving the EPA's one in 1 million cancer risk from TACs.

Local

San Joaquin General Plan

The Public Health & Safety section of San Joaquin County's General Plan provides air quality policies and programs to achieve desired improvements to air quality. Listed below are objectives and policies from the San Joaquin General Plan that would be applicable to the Project:

- **PHS-5.2** – The County shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD) during the review of new development projects which have the potential for causing adverse air quality impacts.
- **PHS-5.3 –** The County shall coordinate with neighboring jurisdictions and affected agencies to address cross-jurisdictional and regional transportation and air quality issues.
- **PHS-5.6** – The County shall require effective buffers between residential areas and other sensitive receptors and non-residential land uses, such as highways, trucking centers, gasoline dispensing facilities, and dry cleaners, that generate toxic air contaminants.
- **PHS-5.9** – The County shall support SJVAPCD efforts to reduce PM10 and PM2.5 emissions from construction, grading, excavation, and demolition to the maximum extent feasible and consistent with State and Federal regulations.

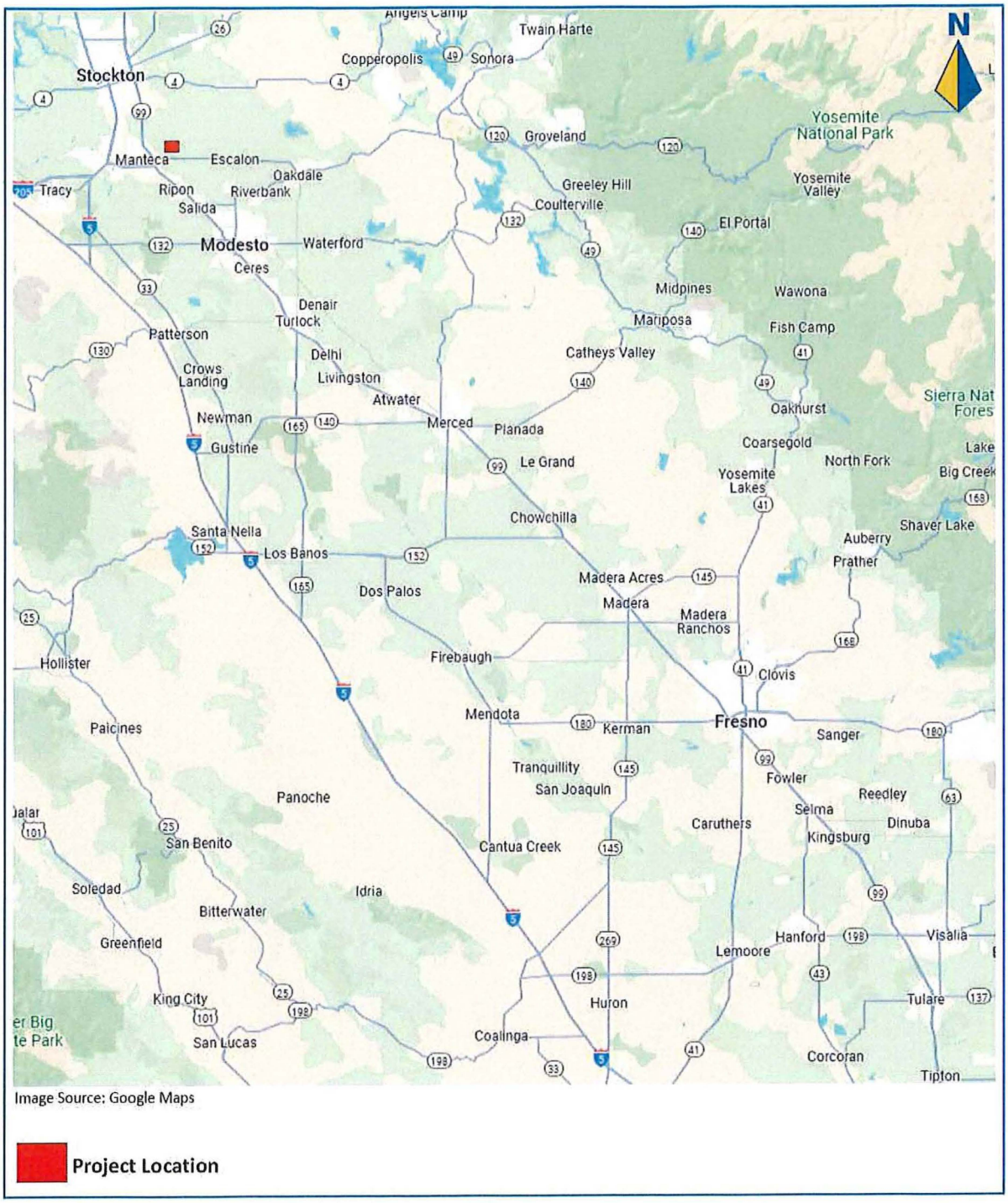


Image Source: Google Maps

Project Location

FIGURE 1
Regional Location

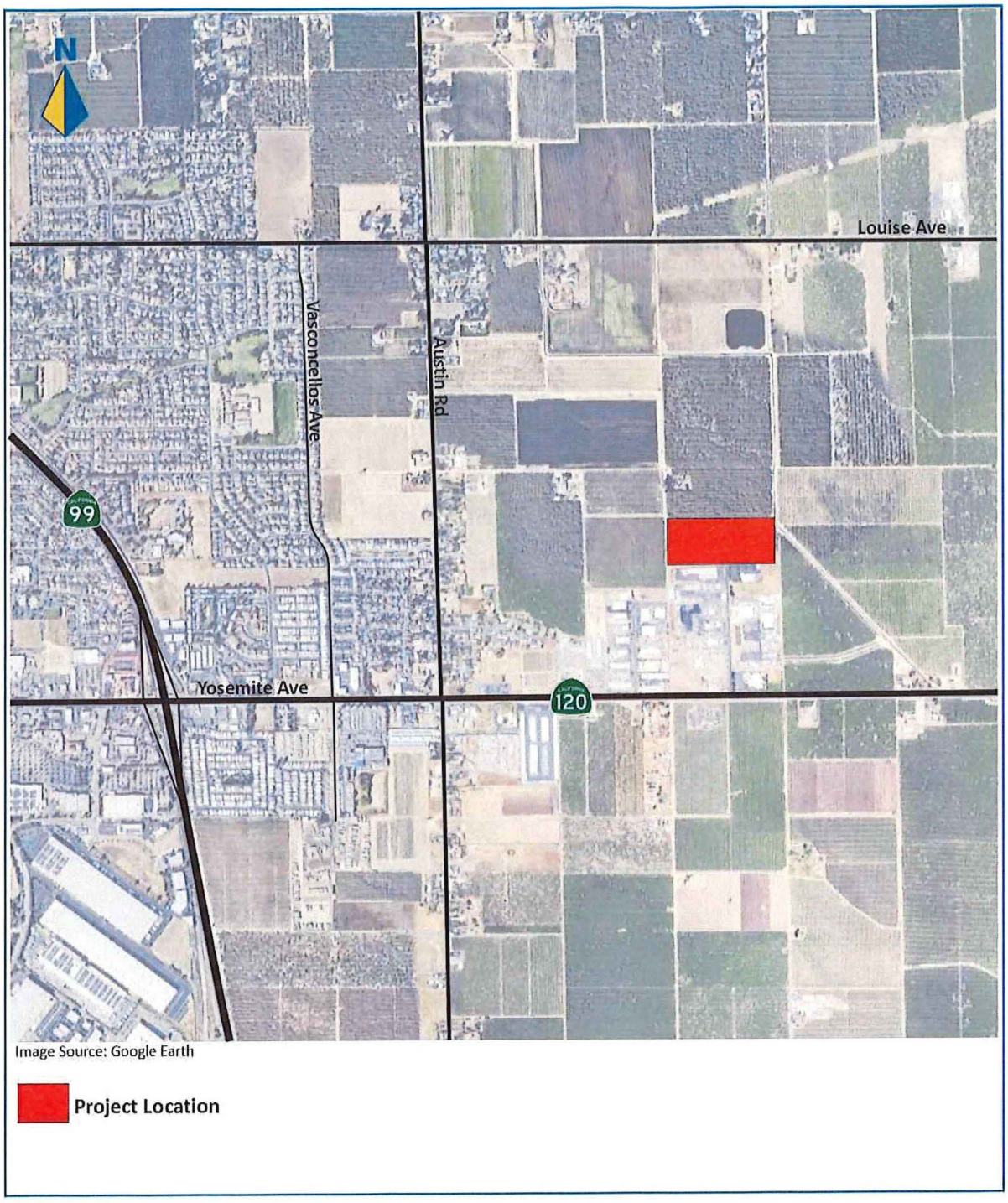


FIGURE 2
Project Location

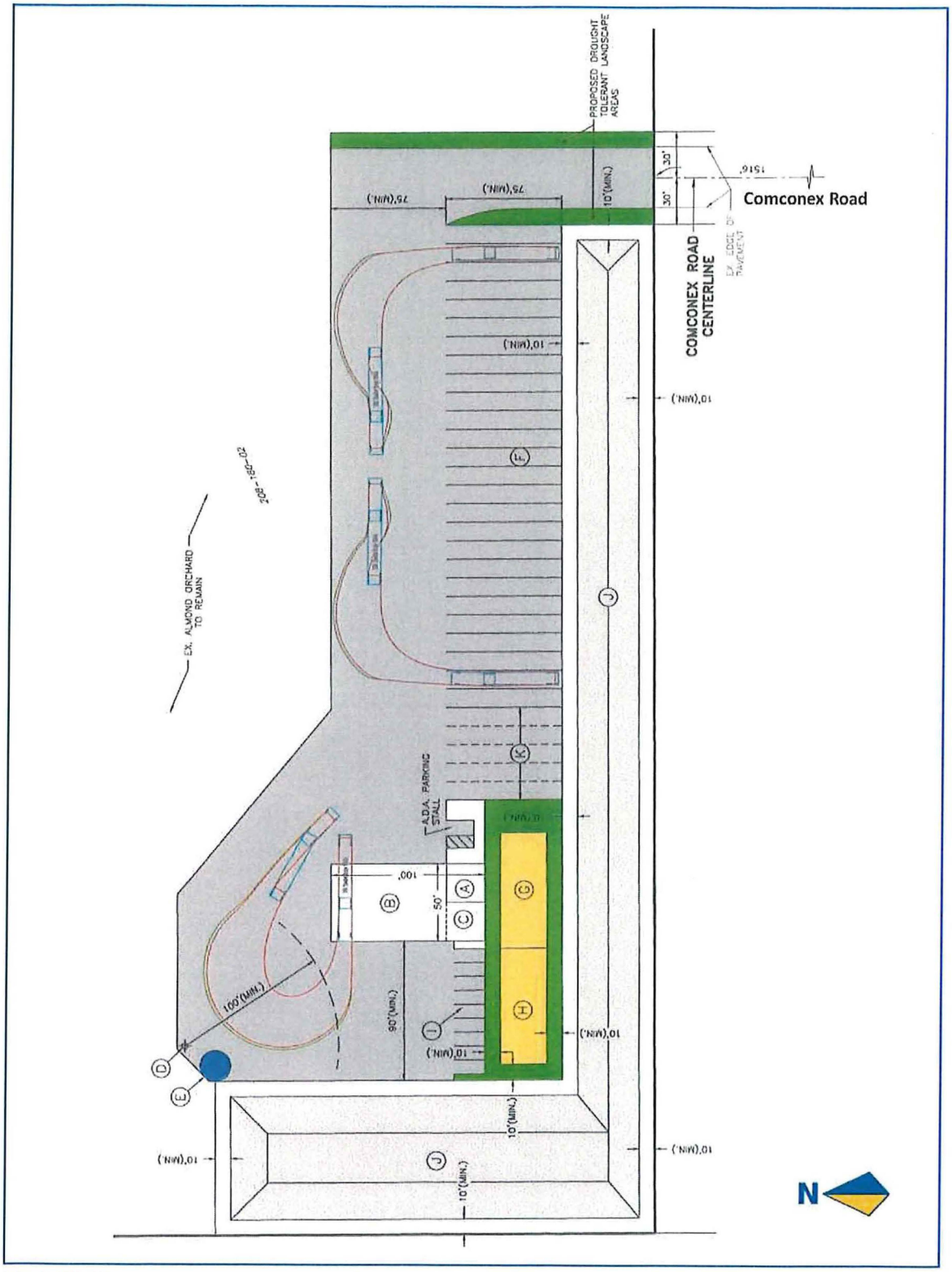


FIGURE 3
Project Site Plan

TABLE 1
RECOMMENDATIONS ON SITING NEW SENSITIVE LAND USES SUCH AS RESIDENCES, SCHOOLS, DAYCARE CENTERS, PLAYGROUNDS, OR MEDICAL FACILITIES*

SOURCE CATEGORY	ADVISORY RECOMMENDATIONS
Freeways and High-Traffic Roads[1]	- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). - Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	- Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. - Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	- Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	- Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	- Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	- Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. - Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations.
Gasoline Dispensing Facilities	- Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

1: The recommendation to avoid siting new sensitive land uses within 500 feet of a freeway was identified in CARB's Air Quality and Land Use Handbook published in 2005. CARB recently published a technical advisory to the Air Quality and Land Use Handbook indicating that new research has demonstrated promising strategies to reduce pollution exposure along transportation corridors.

*Notes:
- These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.
- Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.
- The relative risk for these categories varies greatly (see Table 1-2). To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.
- These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists. The recommended distances take into account other factors in addition to available health risk data (see individual category descriptions).
- Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.
- This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using perchloroethylene that can be addressed with reasonable preventative actions.
- A summary of the basis for the distance recommendations can be found in the ARB Handbook: Air Quality and Land Use Handbook: A Community Health Perspective.

Source: CARB's Air Quality and Land Use Handbook

PROJECT RELATED AIR QUALITY IMPACTS

The California Environmental Quality Act (CEQA) Guidelines, Appendix G, are used to assess the potential significance of Project impacts pursuant to local General Plan policies, Municipal Code standards, or applicable standards of other agencies. Under CEQA, TAC's associated with the Project would be considered significant **if the Project exposed sensitive receptors to substantial pollutant concentrations.**

Construction and Operational air pollutant emissions (criteria pollutants) are typically estimated using the CalEEMod computer program. However, the quantification of criteria pollutant emissions for CEQA purposes is not required based upon the SJVAPCD's Small Project Analysis Levels (SPAL) guidance. Light Industrial land uses that are less than 280,000 square feet AND generate less than 550 Daily one-way trips and 70 Daily one-way Heavy-Heavy Duty Truck (HHDT) trips are deemed to have a less than significant impact on air quality. The Project includes the development of a 625 sq.ft office, 625 sq.ft. parts storage, and a 3,750 sq.ft. shop. Generally, there is a maximum of 15 to 20 trucks parked at the site for a couple of days before departing for five (5) to seven (7) days of hauling. Routine maintenance will be performed as needed (oil changes, tire inspection/repair) while trucks are parked on-site. As a result, the Project is excluded from quantifying criteria pollutant emissions for CEQA purposes. Project construction and operational emissions would not result in an increase in the frequency or severity of any air quality standards violation and would not cause a new air quality standard violation.

Toxic Air Contaminants (TAC)

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The SJVAPCD's *Guidance for Assessing and Mitigating Air Quality Impacts* identifies the need for projects to analyze the potential for adverse air quality impacts to sensitive receptors. From a health risk perspective, the Project is a Type A project in that it may potentially place toxic sources in the vicinity of existing sensitive receptors. The nearest sensitive receptor to the Project is located approximately 900 feet to the north (residential) and 1,500 feet to the southwest (residential). The SJVAPCD's current thresholds of significance for TAC emissions from the operations of both permitted and non-permitted sources are presented below:

- Carcinogens: Maximally Exposed Individual risk equals or exceeds 20 in one million
- Chronic: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual
- Acute: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual

The characteristics of the proposed Project are not consistent with the TAC source categories presented in Table 1. However, diesel exhaust from truck traffic has hundreds of different gaseous and particulate components, many of which are harmful, and have been classified as a human carcinogen. Diesel particles are so small that they penetrate deep into the lungs. According to studies, diesel PM concentrations are significantly greater near busy intersections and roads. Heavy-duty vehicles and off-road construction equipment are main sources of diesel-related emissions. Acute diesel exhaust exposure may irritate the

eyes, nose, throat, and lungs, as well as certain neurological consequences like lightheadedness. A cough or nausea may also be caused by acute exposure, which can potentially make asthma worse. Experimental animal inhalation studies with chronic exposure have revealed a variety of dose-dependent lung cellular alterations, lung inflammation, and immunological consequences from diesel exhaust. There is substantial data, based on both human and laboratory studies, showing diesel exhaust is almost certainly carcinogenic. Studies on human epidemiology show a link between occupational exposure to diesel exhaust and a higher incidence of lung cancer.

The principal sources or processes from the Project that have the potential to emit various TAC's include diesel emissions from Truck Traffic and Truck Idling. Vehicle DPM emissions were estimated using emission factors for particulate matter less than 10µm in diameter (PM10) generated with the 2021 version of EMFAC developed by the ARB. EMFAC 2021 is a mathematical model that was developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by CARB to project changes in future emissions from on-road mobile sources. EMFAC 2021 incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day.

For this Project, annual average PM10 emission factors were generated by running EMFAC 2021 for vehicles in San Joaquin County. The EMFAC model generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. The model was run for speeds traveled in the vicinity of the Project. To conservatively estimate air quality emissions associated with the Project, it was assumed that trucks idle for no more than fifteen (15) minutes while onsite. It should be noted that idling for more than five (5) minutes is prohibited in California. It was also assumed that trucks traveled at 10 miles per hour while performing onsite driving and maneuvering. Emissions estimates for diesel operated vehicles are shown in Tables 2 and 3.

The SJVAPCD Prioritization Calculator was used to determine the "Total Max Score" of Project specific toxic emissions as discussed above. Projects with a Prioritization score of 10 or higher require a Health Risk Assessment with dispersion modeling. Toxic emissions associated with the Project were used as inputs to the Prioritization Calculator which generated the prioritization score for the Project as shown in Table 4. Results indicate that toxic emissions associated with the Project will generate a max score of 0.17 for sensitive receptors within 0 to 100 meters (328 feet) of the Project. The nearest sensitive receptor to the Project is located approximately 900 feet to the north (residential) and 1,500 feet to the southwest (residential). Project emissions associated with the Project will not trigger dispersion modeling since the Total Max Score is less than 10. As a result, dispersion modeling is not required for the Project considering the SJVAPCD's methodology/threshold. TAC emissions generated during Project operations would not expose sensitive receptors to substantial pollutant concentrations. Therefore, mitigation is not warranted since there is a ***less than significant impact*** from Project operational emissions.

TABLE 2
ONSITE ON-ROAD MOBILE SOURCE EMISSIONS

Pollutant	Vehicle Type	EMFAC Vehicle Class	Maximum Daily Trips (trips/day)	Total Annual Round-Trips (trips/yr)	Round-Trip Distance (miles)	Emission Factors [1] (gms/mile)	Emission Factors (lbs/VMT)	Annual Emissions (lbs/mile/yr)	Maximum Daily Emission Estimate (lbs/day)	Annual Average Emission Estimate (tons/yr)
ROG Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.3	0.065	1.442E-04	1.6	0.001341	0.000122
							Total ROG Emissions	**1.6**	**0.001341**	**0.000122**
TOG Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.3	0.074	1.641E-04	1.9	0.001526	0.000139
							Total TOG Emissions	**1.9**	**0.001526**	**0.000139**
SO_x Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.3	0.026	5.838E-05	0.7	0.000543	0.000050
							Total SO_x Emissions	**0.7**	**0.000543**	**0.000050**
CO Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.3	0.620	1.367E-03	15.5	0.012711	0.001160
							Total CO Emissions	**15.5**	**0.012711**	**0.001160**
NO_X Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.3	5.571	1.228E-02	139.0	0.114225	0.010423
							Total NO_X Emissions	**139.0**	**0.114225**	**0.010423**
PM_{10} Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.3	0.007	1.574E-05	0.2	0.000146	0.000013
							Total PM_{10} Emissions	**0.2**	**0.000146**	**0.000013**
$PM_{2.5}$ Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.3	0.007	1.505E-05	0.2	0.000140	0.000013
							Total $PM_{2.5}$ Emissions	**0.2**	**0.000140**	**0.000013**

References:
(1) Emission Factors source: EMFAC2021 for San Joaquin County Year 2025, for speed distribution of 10 mph
Assumptions:
Maximum 31 Daily Truck Trips

TABLE 3
ONSITE ON-ROAD MOBILE SOURCE IDLING EMISSIONS

Pollutant	Vehicle Type	EMFAC Vehicle Class	Maximum Daily Trips (trips/day)	Total Annual Round-Trips (trips/yr)	Idle Time per Trip [1] (hrs/trip)	Idle Emission Factors [2] (g/hr-veh)	Idle Emission Factors (lbs/hr-veh)	Maximum Daily Emission Estimate (lbs/day)	Annual Average Emission Estimate (tons/yr)
ROG Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.25	1.883	4.15E-03	0.032171	0.002936
							Total ROG Emissions	**0.032171**	**0.002936**
TOG Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.25	2.144	4.73E-03	0.036624	0.003342
							Total TOG Emissions	**0.036624**	**0.003342**
CO Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.25	27.131	5.98E-02	0.463557	0.042300
							Total CO Emissions	**0.463557**	**0.042300**
NO_X Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.25	21.542	4.75E-02	0.368059	0.033585
							Total NO_X Emissions	**0.368059**	**0.033585**
SO_X Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.25	0.042	9.27E-05	0.000718	0.000066
							Total SO_X Emissions	**0.000718**	**0.000066**
PM_{10} Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.25	0.015	3.36E-05	0.000261	0.000024
							Total PM_{10} Emissions	**0.000261**	**0.000024**
$PM_{2.5}$ Exhaust	Product Trucks - Outside Sales	T7	31	11315	0.25	0.015	3.22E-05	0.000249	0.000023
							Total $PM_{2.5}$ Emissions	**0.000249**	**0.000023**

References:
(1) Assumes 15 minute idle time
(2) Emission Factors source: EMFAC2021 for San Joaquin County Year 2025.
Assumptions:
Maximum 31 Daily Truck Trips

TABLE 4
TOTAL MAX SCORE FOR PROJECT EMISSIONS

Receptor Proximity and Proximity Factors		Onsite On-Road Mobile Sources	Onsite Truck Idling Sources	Total Max Score
		Max Score	Max Score	
0< R<100	1.000	0.06169	0.10984	0.17153
100≤R<250	0.250	0.01542	0.02746	0.04288
250≤R<500	0.040	0.00247	0.00439	0.00686
500≤R<1000	0.011	0.00068	0.00121	0.00189
1000≤R<1500	0.003	0.00019	0.00033	0.00051
1500≤R<2000	0.002	0.00012	0.00022	0.00034
2000<R	0.001	0.00006	0.00011	0.00017

Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) relies upon air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. As noted in District Rule 2201 (AAQA Modeling), an AAQA should be conducted for a new or modified stationary source when emissions exceed 100 pounds per day for any affected pollutant. As shown in Tables 2 and 3 above, the combined emissions from on-road mobile source and idling emissions will not exceed 100 pounds per day. As a result, an AAQA is not warranted given Project operations.

Should you have any further questions or comments, please contact me by email at jellard@jkconsultinggroupllc.com.

Sincerely,

Jason Ellard, Principal
JK Consulting Group

Attachment

EXHIBIT A

SJVAPCD EMISSION FACTOR/CALCULATION WORKSHEETS



Source: EMFAC2021 (v1.0.2) Emission Rates
Region Type: County
Region: San Joaquin
Calendar Year: 2025
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/year for Combustion VMT and Electric VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HOTSOAK and RI

Region	Calendar Y	Vehicle Cat	Model Year	Speed	Fuel	Population	Total VMT	CVMT	EVMT	Trips	NOx_RUNEX
San Joaquir	2025	T7 Single	Aggregate	Aggregate	Diesel	1802.663	97960.77	97960.77	0	16981.09	1.257054461

JNLOSS, g/vehicle/day for IDLEX and DIURN.

NOx_IDLEX	NOx_STREX	PM2.5_RUNEX	PM2.5_IDLEX	PM2.5_STREX	PM2.5_PMTW	PM2.5_PMBW	PM10_RUNEX	PM10_IDLEX
21.5417766	3.269840957	0.015639096	0.014589453	0	0.009000003	0.028150006	0.016346226	0.015249123

PM10_STREX	PM10_PMTW	PM10_PMBW	CO2_RUNEX	CO2_IDLEX	CO2_STREX	CH4_RUNEX	CH4_IDLEX	CH4_STREX
0	0.03600001	0.08042859	1644.823902	4438.924256	0	0.00058561	0.087454813	0

N2O_RUNEX	N2O_IDLEX	N2O_STREX	ROG_RUNEX	ROG_IDLEX	ROG_STREX	ROG_HOTSOAK	ROG_RUNLOSS	ROG_DIURN
0.259142676	0.699354324	0	0.012608013	1.882878146	0	0	0	0

TOG_RUNEX	TOG_IDLEX	TOG_STREX	TOG_HOTSOAK	TOG_RUNLOSS	TOG_DIURN	NH3_RUNEX	CO_RUNEX	CO_IDLEX
0.014353263	2.143513442	0	0	0	0	0.219897294	0.072625746	27.13107559

CO_STREX	SOx_RUNEX	SOx_IDLEX	SOx_STREX
0	0.015575499	0.042033958	0

Source: EMFAC2021 (v1.0.2) Emission Rates
Region Type: County
Region: San Joaquin
Calendar Year: 2025
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/year for Combustion VMT and Electric VMT, g/mile for RUNEX, PMBW and PMTW, mph for Speed, gallon/mile for Fuel Consumption, kWh/mile f

Region	Calendar Y	Vehicle Cat	Model Year	Speed	Fuel	Total VMT	CVMT	EVMT	NOx_RUNEX	PM2.5_RUNEX	PM10_RUNEX
San Joaquir	2025	T7 Single	Aggregate	10	Diesel	1160.77	1160.77	0	5.571126606	0.006828743	0.007137508
San Joaquir	2025	T7 Single	Aggregate	15	Diesel	2278.923	2278.923	0	3.710442556	0.00532139	0.005562
San Joaquir	2025	T7 Single	Aggregate	20	Diesel	2309.225	2309.225	0	2.845453854	0.004439932	0.004640686
San Joaquir	2025	T7 Single	Aggregate	25	Diesel	2597.817	2597.817	0	2.206398309	0.004022477	0.004204356
San Joaquir	2025	T7 Single	Aggregate	30	Diesel	3528.189	3528.189	0	1.658715206	0.004188353	0.004377732
San Joaquir	2025	T7 Single	Aggregate	35	Diesel	4262.551	4262.551	0	1.232093588	0.004942231	0.005165697
San Joaquir	2025	T7 Single	Aggregate	40	Diesel	5086.669	5086.669	0	0.926064559	0.006284018	0.006568154
San Joaquir	2025	T7 Single	Aggregate	45	Diesel	5408.849	5408.849	0	0.740731453	0.008213915	0.008585312
San Joaquir	2025	T7 Single	Aggregate	50	Diesel	6283.733	6283.733	0	0.67605142	0.010732376	0.011217646
San Joaquir	2025	T7 Single	Aggregate	55	Diesel	7445.745	7445.745	0	0.731718616	0.013840087	0.014465875
San Joaquir	2025	T7 Single	Aggregate	60	Diesel	10430.67	10430.67	0	0.90822291	0.017515813	0.018307801
San Joaquir	2025	T7 Single	Aggregate	65	Diesel	29225.55	29225.55	0	1.206351668	0.0217487	0.02273208
San Joaquir	2025	T7 Single	Aggregate	70	Diesel	11569.17	11569.17	0	1.20606978	0.0217487	0.02273208
San Joaquir	2025	T7 Single	Aggregate	75	Diesel	3439.585	3439.585	0	1.210135291	0.0217487	0.02273208
San Joaquir	2025	T7 Single	Aggregate	80	Diesel	2701.842	2701.842	0	1.211446729	0.0217487	0.02273208
San Joaquir	2025	T7 Single	Aggregate	85	Diesel	231.4728	231.4728	0	1.213415814	0.0217487	0.02273208

'or Energy Consumption.

CO2_RUNEX	CH4_RUNEX	N2O_RUNEX	ROG_RUNEX	TOG_RUNEX	CO_RUNEX	SOx_RUNEX	NH3_RUNEX	PM10_PMBW
2796.270837	0.003037067	0.440553609	0.065387214	0.074438366	0.619956218	0.026479013	0.219897294	0.137209296
2293.298414	0.001530775	0.361310099	0.032957175	0.037519235	0.340697838	0.021716165	0.219897294	0.135387341
2012.560222	0.000950022	0.317079682	0.020453722	0.023285006	0.229197351	0.019057742	0.219897294	0.132448705
1838.114818	0.000733455	0.289595738	0.015791084	0.017976947	0.178140113	0.017405848	0.219897294	0.129510068
1704.430184	0.000596828	0.26853367	0.012849543	0.014628227	0.139787374	0.016139935	0.219897294	0.127688114
1602.197507	0.000494609	0.25242687	0.010648801	0.012122849	0.107579927	0.015171852	0.219897294	0.108066256
1531.352273	0.00042623	0.241265174	0.009176606	0.010446868	0.081460829	0.01450099	0.219897294	0.093847519
1491.856659	0.000391233	0.235042624	0.00842314	0.009589104	0.061389199	0.01412699	0.219897294	0.079628781
1483.686801	0.000389237	0.23375546	0.008380171	0.009540187	0.047336268	0.014049627	0.219897294	0.06939129
1506.826808	0.000419905	0.237401177	0.009040439	0.010291851	0.039282457	0.014268749	0.219897294	0.06939129
1561.402625	0.00048244	0.24599962	0.01038679	0.01182457	0.037258966	0.014785549	0.219897294	0.06939129
1647.377125	0.00057485	0.259544937	0.012376373	0.014089559	0.041168676	0.015599676	0.219897294	0.06939129
1647.377125	0.000576044	0.259544937	0.012402075	0.014118819	0.0414107	0.015599676	0.219897294	0.06939129
1647.377125	0.000577532	0.259544937	0.012434112	0.014155291	0.04174227	0.015599676	0.219897294	0.06939129
1647.377125	0.000579315	0.259544937	0.012472484	0.014198974	0.042163384	0.015599676	0.219897294	0.06939129
1647.377125	0.000581391	0.259544937	0.01251719	0.014249868	0.042674043	0.015599676	0.219897294	0.06939129

PM2.5_PMBW	Fuel Consumpti	Energy Consumption
0.048023253	0.275346006	0
0.047385569	0.225818812	0
0.046357047	0.198174802	0
0.045328524	0.180997336	0
0.04469084	0.167833543	0
0.03782319	0.157766794	0
0.032846632	0.150790734	0
0.027870073	0.14690164	0
0.024286951	0.146097162	0
0.024286951	0.148375736	0
0.024286951	0.153749762	0
0.024286951	0.162215586	0
0.024286951	0.162215586	0
0.024286951	0.162215586	0
0.024286951	0.162215586	0
0.024286951	0.162215586	0

Name

Prioritization Calculator

Applicability	Use to provide a Prioritization score based on the emission potency method. Entries required in yellow areas, output in gray areas.
Author or updater	Matthew Cegielski — *Last Update* July 29, 2025
Facility:	S Line Transportation, Inc.
ID#:	Onsite On-Road Mobile Sources
Project #:	
Unit and Process#	1-0 p1
Operating Hours hr/yr	2,080.00

Receptor Proximity and Proximity Factors		Cancer Score	Chronic Score	Acute Score	Max Score
0< R<100	1.000	6.17E-02	3.85E-04	0.00E+00	6.17E-02
100≤R<250	0.250	1.54E-02	9.63E-05	0.00E+00	1.54E-02
250≤R<500	0.040	2.47E-03	1.54E-05	0.00E+00	2.47E-03
500≤R<1000	0.011	6.79E-04	4.24E-06	0.00E+00	6.79E-04
1000≤R<1500	0.003	1.85E-04	1.16E-06	0.00E+00	1.85E-04
1500≤R<2000	0.002	1.23E-04	7.70E-07	0.00E+00	1.23E-04
2000<R	0.001	6.17E-05	3.85E-07	0.00E+00	6.17E-05

Receptor proximity is in meters. Priortization scores are calculated by multiplying the total scores summed below by the proximity factors. Record the Max score for your receptor distance. If the substance list for the unit is longer than the number of rows here or if there are multiple processes use additional worksheets and sum the totals of the Max Scores.

Use the substance dropdown list in the CAS# Finder to locate CAS# of substances.

Substance	CAS# Finder
Diesel engine exhaust, particulate matter (Diesel PM)	9901

1-0 p1

Enter the unit's CAS# of the substances emitted and their amounts.

Prioritzation score for each substance generated below. Totals on last row.

Substance	CAS#	MW Correction	Annual Emissions (lbs/yr)	Maximum Hourly (lbs/hr)	Corrected Annual Emissions (lbs/yr)	Corrected Maximum Hourly (lbs/hr)	Average Hourly (lbs/hr)	Cancer	Chronic	Acute
Diesel engine exhaust, particulate matter (Diesel PM)	9901	1.0000	2.67E-02	1.83E-05	2.67E-02	1.83E-05	1.28E-05	6.17E-02	3.85E-04	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
							Totals	**6.17E-02**	**3.85E-04**	**0.00E+00**

Name

Prioritization Calculator

Applicability	Use to provide a Prioritization score based on the emission potency method. Entries required in yellow areas, output in gray areas.		
Author or updater	Matthew Cegielski	*Last Update*	July 29, 2025
Facility:	S Line Transportation, Inc.		
ID#:	Onsite Idling Sources		
Project #:			
Unit and Process#	1-0 p1		
Operating Hours hr/yr	2,080.00		

Receptor Proximity and Proximity Factors	Cancer Score	Chronic Score	Acute Score	Max Score
0< R<100 1.000	1.10E-01	6.86E-04	0.00E+00	1.10E-01
100≤R<250 0.250	2.75E-02	1.71E-04	0.00E+00	2.75E-02
250≤R<500 0.040	4.39E-03	2.74E-05	0.00E+00	4.39E-03
500≤R<1000 0.011	1.21E-03	7.54E-06	0.00E+00	1.21E-03
1000≤R<1500 0.003	3.30E-04	2.06E-06	0.00E+00	3.30E-04
1500≤R<2000 0.002	2.20E-04	1.37E-06	0.00E+00	2.20E-04
2000<R 0.001	1.10E-04	6.86E-07	0.00E+00	1.10E-04

Receptor proximity is in meters. Priortization scores are calculated by multiplying the total scores summed below by the proximity factors. Record the Max score for your receptor distance. If the substance list for the unit is longer than the number of rows here or if there are multiple processes use additional worksheets and sum the totals of the Max Scores.

Use the substance dropdown list in the CAS# Finder to locate CAS# of substances.

Substance	CAS# Finder
Trimethylbenzenes	25551137

1-0 p1

Enter the unit's CAS# of the substances emitted and their amounts.

Prioritzation score for each substance generated below. Totals on last row.

Substance	CAS#	MW Correction	Annual Emissions (lbs/yr)	Maximum Hourly (lbs/hr)	Corrected Annual Emissions (lbs/yr)	Corrected Maximum Hourly (lbs/hr)	Average Hourly (lbs/hr)	Cancer	Chronic	Acute
Diesel engine exhaust, particulate matter (Diesel PM)	9901	1.0000	4.75E-02	3.26E-05	4.75E-02	3.26E-05	2.29E-05	1.10E-01	6.86E-04	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
							Totals	**1.10E-01**	**6.86E-04**	**0.00E+00**