PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE **AGENDA DATE: June 11, 2020**

FROM: PLANNING & DEVELOPMENT SERVICES **AGENDA TIME 1:30 PM/ No. 3**

PROJECT TYPE: Conditional Use Permit #20-0002; Fondomonte. SUPERVISOR DISTRICT #4

LOCATION: 6546 Blair Road APN: 023-030-009-000

Calipatria, CA PARCEL SIZE: +/- 160 Acres

GENERAL PLAN (existing) Agriculture GENERAL PLAN (proposed) N/A

ZONE (existing) A-2 (General Agriculture) ZONE (proposed) N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: ______

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: ______

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 06/11/2020

INITIAL STUDY: 20-0003

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☒ NONE	☐ ATTACHED
AG	☒ NONE	☐ ATTACHED
APCD	☐ NONE	☒ ATTACHED
E.H.S.	☐ NONE	☒ ATTACHED
FIRE / OES	☒ NONE	☐ ATTACHED
SHERIFF.	☒ NONE	☐ ATTACHED
OTHER	IID, Fort Yuma Quechan Indian Tribe	

REQUESTED ACTION:

(See Attached)

Planning & Development Services
801 MAIN ST., EL CENTRO, CA 92243 442-265-1736
(Jim Minnick, Director)
S:\AllUsers\APN\023\030\009\CUP#20-0002\EEC\IS 20-0003 PROREP.docx

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☑ NEGATIVE DECLARATION

☐ MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Conditional Use Permit #20-0002
Fondomonte California LLC

Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
www.icpds.com

June, 2020

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SECTION 1
INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Conditional Use Permit #20-0002 (Refer to Exhibit "A" & "B").

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☐ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☑ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☐ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

This Initial Study and Negative Declaration are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a significant impact, potentially significant impact, or no impact.

PROJECT SUMMARY, LOCATION AND EVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

<u>SECTION 4</u>

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.

2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.

3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".

4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Negative Declaration will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. <u>Tiered Documents</u>

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects;

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incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.

- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

II. Environmental Checklist

1. **Project Title**: Conditional Use Permit (CUP) #20-0002 Fondomonte California LLC
2. **Lead Agency**: Imperial County Planning & Development Services Department
3. **Contact person and phone number**: Mariela Moran, Planner II, (442)265-1736
4. **Address**: 801 Main Street, El Centro CA, 92243
5. **E-mail**: marielamoran@co.imperial.ca.us
6. **Project location**: The proposed project site is also identified as Blair Ranch Site 1 (BRS1) and it is located on a single parcel (Assessor's Parcel Number [APN] 023-030-009) at 6546 Blair Road, Calipatria in unincorporated Imperial County (**Figure 1**). The western boundary of the parcel is approximately one-half mile from the eastern boundary of the City of Calipatria. The proposed project site is bordered by Young Road on the north, State Route (SR) 115 on the south, County Road 8113 on the east and Blair Road on the west. The Imperial Irrigation District (IID) E Drain is located along the northern property line and the D Lateral is adjacent to the southern property line.
7. **Project sponsor's name and address**: Fondomonte, California, LLC,

   250 North Litchfield Road Suite 101

   Goodyear, AZ 85338
8. **General Plan designation**: Agriculture
9. **Zoning**. A-2 (General Agriculture)
10. **Description of project**: Fondomonte grows forage crops in, and purchases forage products from, the Imperial Valley (in Imperial County), the Palo Verde Valley (next to the eastern border of Southern California with Arizona) and Arizona. The product is stored at the proposed project site until it is ready to be pressed.

    Currently, under existing CUP #16-0017, the applicant is permitted to store 75,000 standard tons of unprocessed forage product. The facility currently operates six days per week, sixteen hours per day. Fondomonte is proposing to store 110,000 standard tons of unprocessed forage product such as alfalfa, Bermuda Grass and Sudan grass. The amount of product processed per day is 1,100 standard tons with a total of 400,000 standard tons processed annually. Per CUP #16-0017, the site is entitled to operate seven days a week, 24-hours a day.

    Per existing CUP #16-0017, the project is entitled to employ 49 staff members. Fondomonte currently employs 96 staff. The existing day-shift (4:00 a.m. to 3:00 p.m.) totals 75 to 80 staff and the night-shift (3:30 p.m. to 3:00 a.m.) totals 16. Night-shift staff only operate the press and provide security. The office, scale and yard are only staffed during daylight hours 7 a.m. to 5 p.m.

    The project site is surrounded by an 8-foot high chain-link fence with two access points. The main access is a commercial driveway along Blair Road which extends east into the facility leading to a guard house. Traffic heading north or south along Blair Road can turn right or left into the facility. A second access off Blair Road is located south of the main access and provides a right-hand only turn into the facility.

    Other on-site buildings include the pressed hay building, staging hay building, two (2) finished hay buildings, a shop building and restroom facility.

    On-site ancillary facilities include: a concrete dock; two (2) 136-foot long by 14-feet wide scales (one in-bound and one out-bound); a 100,000 gallon water tank; one (1) 10,000 gallon dual wall diesel gas tank; a 2,000 gallon unleaded gas tank; a pump and concrete pad; a fill riser; a 4-inch concrete roll-over berm containment area; and chaff containment area.

    The existing site at 6456 Blair Road, Calipatria is proposing to amend its CUP 16-0017 to address issues of non-compliance. These include exceeding the permitted quantities of the amount of raw hay stored on site; the number of truck round-trips to the site; the number of container truck trips going out of the site; the number of employee round trips; and the number of employees working at the facility. The amendments are proposed for approval under a new CUP.

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11. **Surrounding land uses and setting**: The Project site is a 160-acre parcel surrounded by IID drains and canals as well as agricultural land. The western boundary of the parcel is approximately one-half mile from the eastern boundary of the City of Calipatria. BRS1 is bordered by Young Road on the north, SR 115 on the south, County Road 8113 on the east and Blair Road on the west. The IID E Drain adjacent to the northern property line and the D Lateral is adjacent to the southern property line.

12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.): Imperial Irrigation District (IID), Imperial County Air Pollution Control District (ICAPCD), Imperial County Department of Public Works (ICPWD), Imperial County Environmental Health Services (EHS) Environmental Evaluation Committee (EEC), Imperial County Planning Commission (PC).

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentially, etc.?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

The AB 52 Notice of Opportunity to consult on the proposed project letter was mailed via certified mail on April 9, 2020 to President Jordan D. Joaquin, from the Quechan Indian Tribe. On April 14, 2020, we received an email from H. Jill McCormick, Historic Preservation Officer for the Yuma Quechan Tribe informing that they did not have comments on this project.

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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 /Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☐	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

☑ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Found 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.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found 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.

☐ Found 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.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE DE MINIMIS IMPACT FINDING: ☑ Yes ☐ No

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☑	☐	☐
ENVIRONMENTAL HEALTH SVCS	☐	☐	☑
OFFICE EMERGENCY SERVICES	☐	☐	☑
APCD	☑	☐	☐
AG	☑	☐	☐
SHERIFF DEPARTMENT	☐	☐	☑
ICPDS	☑	☐	☐

for [signature] 6-16-2020

Jim Minnick, Director of Planning/EEC Chairman Date:

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PROJECT SUMMARY

Note: All figures referenced are included in the Project Description attached to this Initial Study Checklist.

A. Project Location: The project site is labeled as "Blair Ranch Site 1" on Figure 1 below, and it is located at 6546 Blair Road, Calipatria in unincorporated Imperial County. The western boundary of the parcel is approximately one-half mile from the eastern limit of the City of Calipatria. The project site is bordered by Young Road on the north, SR 115 on the south, County Road 8113 on the east and Blair Road on the west. The IID E Drain is adjacent to the northern property line and the D Lateral is adjacent to the southern property line.

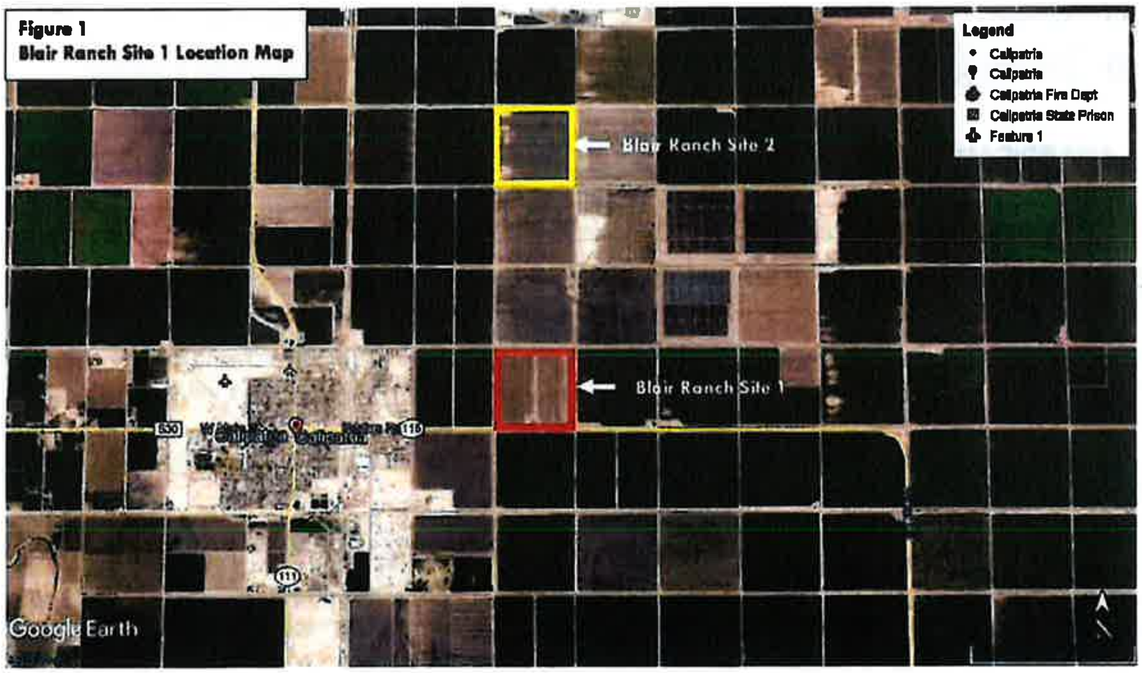


Figure 1
Blair Ranch Site 1 Location Map

B. Project Summary: Fondomonte is amending the existing CUP #16-0017 to address non-compliance issues which include exceeding the permitted quantities of the following: the amount of raw hay stored on site; the number of truck round-trips to the site; the number of container truck trips going out of the site; the number of employee round trips; and the number of employees working at the facility. A summary of existing and proposed conditions is provided in the table below.

SUMMARY OF EXISTING CUP AND PROPOSED (AMENDED CUP) CONDITIONS

Activity	Existing CUP Entitlement	Proposed (Amended) Amended CUP	Change
Hay Pressed (tons/day)	1,100 standard tons (st)	1,100 st	0
Presses	2	2	0
Raw Hay Stored on-site	75,000 st	110,000 st	+35,000 st
Annual Raw Hay Processed	400,000 st	400,000 st	0
Double trailer Truck Round-Trips to Site	60	100	+40
Container Truck Trips Out	50	60	+10
Employee Round Trips	48	100	+52
Dust Collector	12,000 cubic feet for minute (cfm)	12,000 cfm	0
Working Hours	24	24	0
Employees	49	100	+51

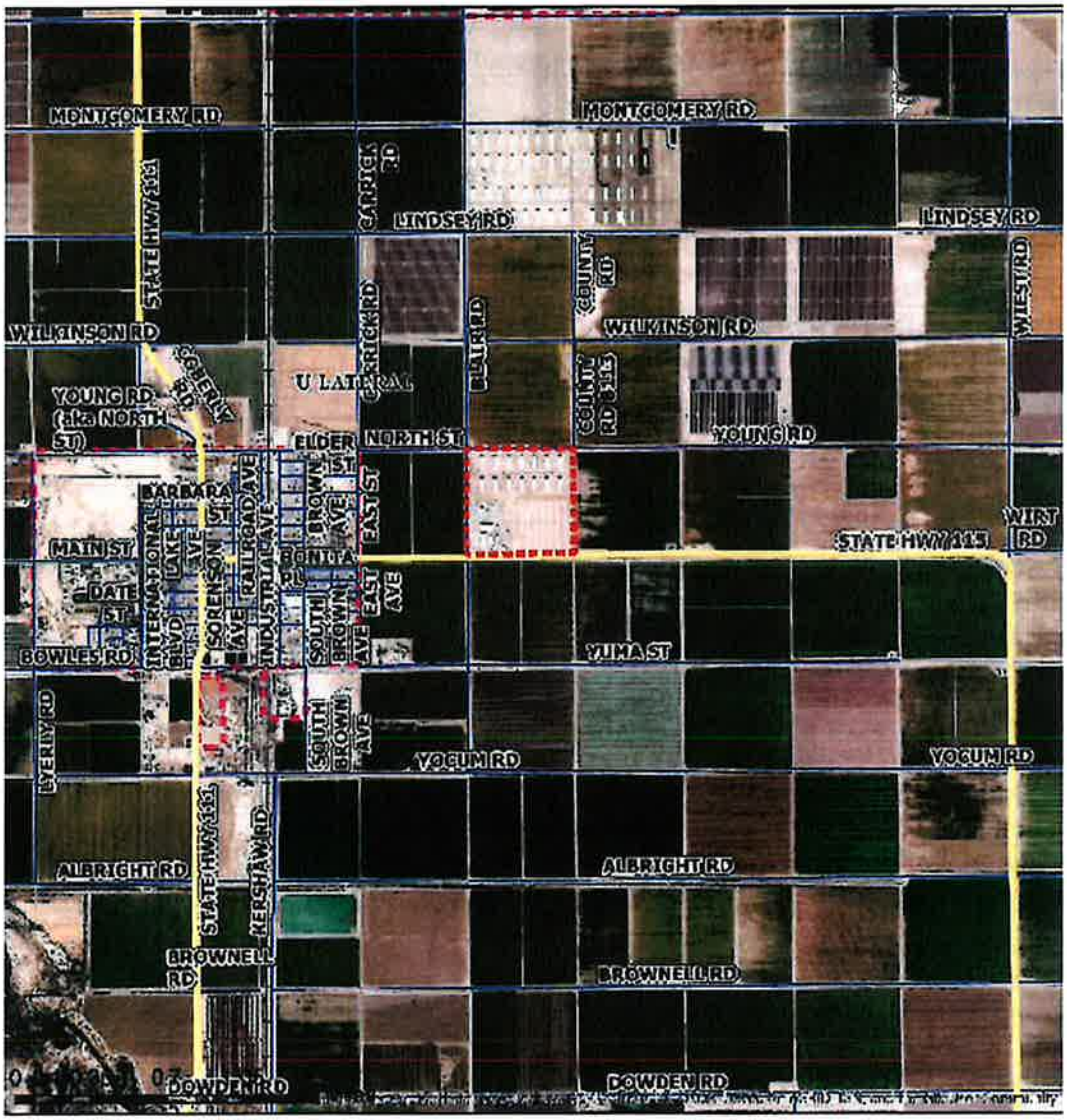
C. Environmental Setting: The proposed project site is surrounded by agricultural land. The western boundary of parcel is approximately one-half mile from the eastern boundary of the City of Calipatria. A separate hay storage yard also owned by Fondomonte, known as Blair Ranch Site 2 (BRS2) is located one mile to the north at 6850 Blair Road.

D. Analysis: The Project is the amendment of the existing CUP (#16-0017) for BRS1 to address non-compliance issues. The Project is consistent with the existing land use designation of Agriculture and zoning designation of A-2 General Agriculture. The existing hay press operation use is conditionally allowed with approval of a CUP. The amended CUP would comply with all conditions regarding operation of the facility including: the amount of raw hay stored on site; the number of truck round-trips to the site; the number of container truck trips going out of the site; the number of employee round trips; and the number of employees working at the facility.

E. General Plan Consistency: The Project is consistent with the existing land use designation of Agriculture and the zoning designation of A-2 General Agriculture. Hay processing and storage is conditionally allowed with approval of a CUP. The Project proposes to amend the existing CUP to bring operations into compliance.

Exhibit “A”
Vicinity Map

PROJECT LOCATION MAP

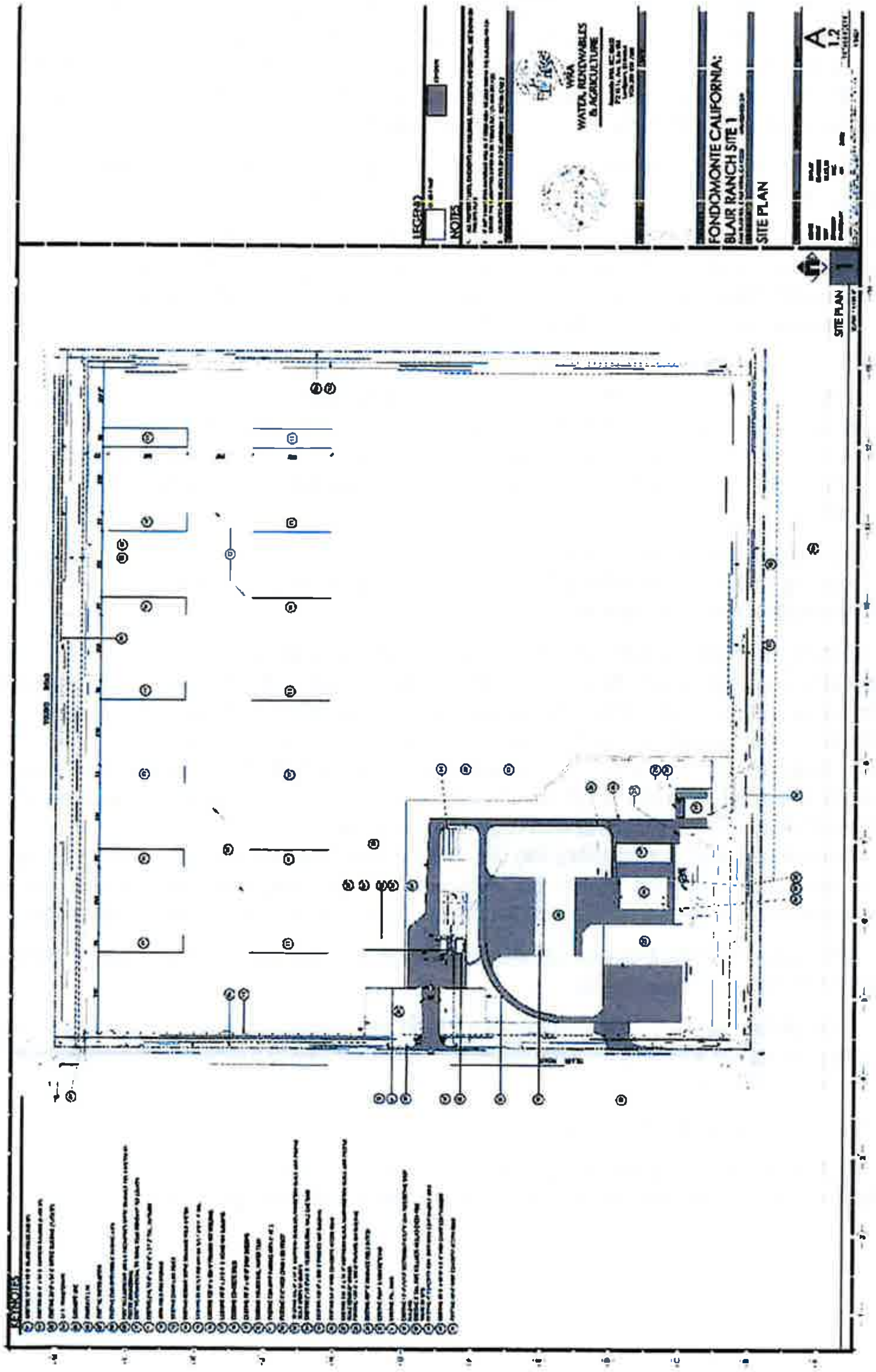


FONDOMONTE CALIFORNIA, LLC
CONDITIONAL USE PERMIT
#20-0002
INITIAL STUDY #20-0003
APN 023-030-009-000

HIGHWAYS
PARCELS
CITYLIMIT
PROJECT LOCATION

N

Exhibit "B"
Site Plan



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EVALUATION OF ENVIRONMENTAL IMPACTS:

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 "Earlier Analyses," as described in (5) below, 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. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in 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

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

I. *AESTHETICS*

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

	PSI	PSUMI	LTSI	NI
a) Have a substantial adverse effect on a scenic vista or scenic highway?	☐	☐	☐	☒

a) The proposed project site is bordered by Young Road on the north, SR 115 on the south, County Road 8113 on the east and Blair Road on the west. The IID E Drain is located along the northern property line and the D Lateral is adjacent to the southern property line. The surrounding area is characterized by flat topography, agricultural fields and irrigation infrastructure. No scenic vistas are present.

A search of Caltrans eligible State Scenic Highways revealed that SR 115 is not an "officially designated" or "eligible" state scenic highway (Caltrans 2019). Therefore, the proposed Project would not have a substantial adverse effect on a scenic vista or scenic highway. No impact would occur.

	PSI	PSUMI	LTSI	NI
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

b) The proposed project is located on a 160-acre parcel that is developed with a hay press, 14 barns for hay storage, a concrete dock, chaff containment area, and supporting buildings. BRS1 does not contain any scenic resources including trees, rock outcroppings or historic buildings. Likewise, there are no scenic highways in the vicinity of BRS1. The Project wound not damage scenic resources within a state scenic highway as none are present. No impact would occur.

	PSI	PSUMI	LTSI	NI
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒

c) The proposed project is in central Imperial County approximately one-half mile to the east of the City of Calipatria. The area is surrounded by agricultural fields and is considered a nonurbanized area. Public views are available to travelers along surrounding roads including Young Road on the north, SR 115 on the south, County Road 8113 on the east and Blair Road on the west. However, traffic volumes are low and a substantial number of people would not be viewing the area. Most traffic on surrounding roads is agriculture related. A portion of traffic in the area includes delivery of raw hay to BRS1 and hauling of finished product to the railspur at the All American Grain facility on Yocum Road. The Project is an amendment to BRS1's existing CUP to bring operations into conformance with the conditions of the CUP. The Project would not degrade the existing visual character of the site. No impact would occur.

	PSI	PSUMI	LTSI	NI
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

d) The proposed project has night lighting throughout the site. Shielded flood lights are on all buildings for safety and overhead lights are located near the entry, at the shop, finished hay area and all paved areas throughout the site. No new lighting is proposed as part of the Project. Minimal light and glare may be generated by truck windshields and headlights but this would not result in an adverse impact to the site or surrounding uses as there are no sensitive receptors or residences adjacent to the Project site. The closest residence is approximately one mile to the east. Therefore, less than significant impacts are expected.

II. *AGRICULTURE AND FOREST RESOURCES*

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

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:

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐

a) The Project site is designated as "Farmland of Statewide Importance" on the Imperial County Important Farmland 2016 Map prepared by the California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP). Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date (DOC 2017). The Project would not result in any further impacts to Farmland of Statewide Importance than are currently taking place as no additional conversion is proposed as part of the amended CUP. Thus, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. Less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☒	☐

b) The Project site is designated "Agriculture" on the Imperial County Land Use Plan (Imperial County 2007) and Zoned A-2 (General Agricultural). BRS1 is under a Williamson Act Non-Renewal according to the Williamson Act Map Created in 2012 by the Imperial County Planning and Development Services Department for the Imperial County Board of Supervisors Order #101. This designation is used for enrolled lands for which non-renewal has been filed pursuant to Government Code Section 51245 (ICPDS 2016). A hay press/storage facility is an agriculture-related use consistent with the intent of the Williamson Act program. Therefore, the proposed Project would not conflict with the existing Agricultural zoning or surrounding (to the northwest) Williamson Act Contracts in non-renewal. Less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
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))?	☐	☐	☐	☒

c) Imperial County does not have any land zoned forest, timberland or timberland production. Thus, the proposed Project would not conflict with any existing forest lands, timberlands, or timberland zoned Timberland Production. The Project would have no impact to forest land or timberland.

	PSI	PSUMI	LTSI	NI
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

d) No forest land is present either on-site or in the immediate vicinity of BRS1. The proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☐	☒

e) The proposed Project would amend the existing CUP for BRS1. The proposed amendment would address issues of non-compliance but does not involve the conversion of Farmland of any kind. There are no forest lands in Imperial County. No impact to the existing environment would occur regarding conversion of Farmland to a non-agricultural use or forest land to a non-forest use.

III. *AIR QUALITY*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to the following determinations. Would the Project:

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	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

a) Per the proposed project's Air Quality Impact Assessment (OB-1 2020), CEQA requires that projects be consistent with the applicable Air Quality Management Plan (AQMP). A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at a stage early enough to ensure that air quality concerns are fully addressed. The Imperial County Air Pollution Control District's (ICAPCD's) CEQA Handbook states that a Comprehensive Air Quality Analysis Report (CAQAR) of a proposed project should demonstrate compliance with the most recent ozone AQMP and PM10 SIP. It also states the CAQAR should demonstrate compliance with the Imperial County Rules and Regulations as well as State and federal regulations (OB-1 2020).

Ozone Air Quality Management Plan (AQMP)

Imperial County was required to submit for EPA approval a 2009 8-Hour Ozone "Modified" Air Quality Management Plan (Modified AQMP), which was approved July 13, 2010. In order to develop the Modified AQMP, a control strategy for meeting State and federal requirements is required. The ICAPCD control strategy included an interactive process of technology and strategy review supported by ambient air quality modeling (OB-1 2020).

The modeling assists in identifying current and remaining emission targets that would help to achieve the ambient air quality standards. The Modified AQMP control measures consist of three components: 1) the ICAPCD's Stationary Source Control Measures; 2) Regional Transportation Strategy and Control Measures; and 3) State Strategy. These measures primarily rely on the traditional command and control approach and as such provide the framework for ICAPCD Rules that reduce ROG and NOX emissions (OB-1 2020).

The Project does not produce new residential activity; produces only minimal additional traffic activity during project operations; and does not fall outside of the modeling forecast estimations used in determining continued maintenance (OB-1 2020).

PM10 State Implementation Plan (PM10 SIP)

The PM10 SIP was required to address and meet the following elements required under the Federal Clean Air Act (FCAA) of areas classified to be in serious nonattainment of the National Ambient Air Quality Standard (NAAQS):

- Best available emission inventories.
- A plan that enables attainment of the PM10 federal air quality standards.
- Annual reductions in PM10 or PM10 precursor emissions that are of not less than 5 percent from the date of SIP submission until attainment.
- Best available control measures and best available control technologies for significant sources and major stationary sources of PM10, to be implemented no later than 4 years after reclassification of the area as serious.
- Transportation conformity and motor vehicle emission budgets in accord with the attainment plan.
- Reasonable further progress and quantitative milestones.
- Contingency measures to be implemented (without the need for additional rulemaking actions) if the control measure regulations incorporated in the plan cannot be successfully implemented or fail to give the expected emission reductions.

In November 2005, revised Regulation VIII fugitive dust control measures were adopted, which form the core of the Imperial County PM10 control strategy. The Project is required to comply with all applicable Regulation VIII measures. Therefore, the Project would not conflict with, or obstruct implementation of, the applicable air quality plan (OB-1 2020). This impact is less than significant.

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?	☐	☐	☒	☐

b) In accordance with CEQA Guidelines 15130(b), this analysis of cumulative impacts incorporates a summary of projections. The following three-tiered approach is used to assess cumulative air quality impacts (OB-1 2020).

- Consistency with the ICAPCD project specific thresholds for construction and operation.
- Project consistency with existing air quality plans.
- Assessment of the cumulative health effects of the pollutants.

Project Specific Thresholds

As previously mentioned above, compliance with ICAPCD regulations and air quality plans, are expected to reduce impacts such that the Project will not exceed the ICAPCD regional significance thresholds. Emissions that do not exceed the project-specific thresholds are likewise assumed to have no cumulative impact (OB-1 2020).

Air Quality Plans

The area in which the Project is located is in nonattainment for ozone and PM_{10}. As such, the ICAPCD is required to prepare and maintain an AQMP to document the strategies and measures to be undertaken to reach attainment of ambient air quality standards. As in item "a)" above, the Project is compliant with the AQMP and would not result in a significant impact (OB-1 2020).

Cumulative Health Impacts

The area is in nonattainment for ozone and PM_{10}, which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some of the sensitive individuals of the population experience adverse health effects (OB-1 2020).

The localized significance analysis discussed under item "c)" showed that during construction no localized adverse exposure was expected; therefore, the emissions of particulate matter and NOX would not result in a significant cumulative health impact (OB-1 2020).

Project Related Construction Emissions

Because the proposed Project is an amendment to the existing CUP to address non-compliance issues, no construction activities are involved. Therefore, no analysis of construction emissions was necessary (OB-1 2020).

Project Related Operational Emissions

Emission factors for vehicular activity related to heavy-duty diesel trucks hauling to and from the Project and commute of employees were estimated using the California Air Resources Board (CARB's) latest EMFAC2017 model with emission rate data for Imperial County for the 2020 calendar year. For most truck trips, this analysis used aggregate model years, which is an average age of vehicles specific for Imperial County. The Project will use only California-carriers for all outbound traffic, which will be following Title 13, Section 2025 of the California Code of Regulations. For carriers transporting finished product from the Project site, all truck fleets are to be model year 2010 or newer.

To generate expected exhaust emissions from employee vehicles, this analysis used CARB's latest

EMFAC2017 model. In order to more accurately represent the type of vehicles used by Project employees, an activity-weighted average emission factor was generated using light-duty automobiles and light-duty trucks. The weighted averages were derived from the distributions of vehicle miles traveled (VMT) in 2020 in Imperial County from EMFAC2017 .

The number of proposed on-road vehicles used was obtained from the Traffic Impact Analysis prepared for the Project (LLG 2019) and estimated trip lengths were estimated by assuming that 50 percent of employees would come from El Centro with the other half originating nearer to Brawley. The trip lengths for the haulers bringing product to the Project site were provided by Fondomonte and estimated to be 64.92 percent from Imperial Valley, equally distributed between the southern and northern portion; 23.36 percent from the areas around Blythe, California; 9.72 percent from the areas around Yuma, Arizona; and 2 percent from the areas around Poston, Arizona.

Emission factors for off-road equipment used on-site were taken from the Data Tables in the latest CalEEMod Guidance Document. A specific list of equipment was assigned an appropriate equipment type categorized in CARB's OFFROAD model. Where necessary, brake-horsepower estimates were obtained from Fondomonte.

In addition, entrained road dust emissions were assigned to haulers and employees. The ICAPCD usually recommends that 50 percent of vehicular travel in Imperial County be assumed to be on unpaved roads. Because employees will be using a parking area adjacent to a paved road, for this analysis, all employee commute trips were assumed to be on paved roads. This analysis also assumed that 95 percent of the hauler fleets travel will be on paved roads, with 5 percent assigned to the potential of off-road activity. The shuttle trucks to and from BSR2 were assumed to travel on dirt roads 50 percent of the time.

The CEQA Handbook does not provide any direction on the applicable threshold, so this analysis utilizes the South Coast Air Quality Management District's (SCAQMD) guidance on project-related localized significance thresholds (LST). Since the South Coast Air Basin is also classified as nonattainment for PM10 and PM2.5 emissions, the SCQAMD's method to analyze local air emission impacts is appropriate. This methodology developed operational PM10 and PM2.5 project level concentration threshold of 2.5 $\mu g/m^3$ for 24-hour concentrations and 1.0 $\mu g/m^3$ for annual PM10 concentrations.

Table AQ-1 summarizes project-related annual operational air emissions. The ICAPCD thresholds of significance are also included in this table as well as information regarding whether annual operational emissions would exceed those thresholds. Detailed emissions calculations are included in Appendix A of **Attachment 1**.

TABLE AQ-1
PROJECT OPERATIONAL UNMITIGATED EMISSIONS

Emission Sources	**Criteria Emissions (lbs/d)**				
	ROG	**CO**	**NOX**	**PM10**	**PM2.5**
On-road sources	1.16	6.44	5.11	42.91	0.86
Off-road equipment	4.74	36.70	52.29	2.63	1.99
Entrained road dust	—	—	—	27.56	3.32
Total	**5.9**	**43.1**	**57.4**	**73.1**	**6.2**
ICAPCD Regiona	*137*	*550*	*137*	*150*	*550*
Exceed	*No*	*No*	*No*	*No*	*No*

Source: OB-1 2020, p. 31.

As shown in **Table AQ-1**, operational emissions would be well below ICAPCD Tier 1 Regional thresholds. Detailed emissions calculations are included in Appendix A of **Attachment 1**.

The Project would not result in cumulatively considerable net increase of any criteria pollutant for which the

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project region is in non-attainment under an applicable federal or state ambient air quality standard and therefore would result in a less than significant impact (OB-1 2020).

c) Expose sensitive receptors to substantial pollutants concentrations?	☐	☐	☒	☐

c) Sensitive receptors are defined as land uses where sensitive population groups are likely to be located (e.g., children, the elderly, the acutely ill, and the chronically ill). These land uses include residences, schools, childcare centers, retirement homes, convalescent homes, medical care facilities, and recreational facilities. Sensitive receptors that may be adversely affected by the Project include the surrounding residential land uses (OB-1 2020).

The nearest sensitive receptor to the Project site consist of a farmhouse located approximately 2,500 feet east of the Project site and approximately 195 feet north of SR 115 centerline and single-family homes located as near as 2,700 feet west of the Project site and as near as 60 feet south of the SR 115 centerline.

Toxic Air Contaminants (TACs)

Due to the Project's ongoing reliance on heavy duty diesel trucks and diesel off-road equipment, an assessment of the potential health risk from TAC emissions resulting from the operation of the Project was conducted and the Health Risk Assessment (HRA) is presented in full in Appendix B of **Attachment 1**. The HRA was conducted, in part, to determine the potential cancer and non-cancer (acute and chronic) risks associated with the operation of the Project. Health risks from TACs are twofold; 1) TACs are carcinogens according to the State and 2) short-term acute and long-term chronic exposure to TACs can cause chronic and/or acute health effects to the respiratory system. The HRA concluded:

- All Diesel Particulate Matter (DPM) emissions concentrations at the nearby sensitive receptors were found to be below the 10.0 in one million cancer risk threshold. Therefore, a less than significant cancer risk would occur from DPM emissions generated from the operation of the Project.
- The on-going operations of the Project would result in a less than significant impact due to the non-cancer chronic and acute health risks from TAC emissions created by the Project.

CO Hot spots

Another way a project can obstruct implementation of the applicable air quality plan is the potential to create a CO hotspot. This can occur when vehicles are idling at highly congested intersections. According to the Traffic Impact Assessment (LLG 2019), the Project would not create an increase in congestion of the magnitude required to generate a CO hotspot.

Overall, the Project would not expose the public to substantial pollutant concentrations. Therefore, the Project's impact regarding obstruction of implementation of the applicable air quality plan is less than significant.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

d) The CEQA Guidelines indicate that a significant impact would occur if a project would create objectionable odors affecting a substantial number of people. While offensive odors rarely cause any physical harm, they can be very unpleasant leading to considerable distress among the public and often generating citizen complaints to local governments and the ICAPCD. Because offensive odors rarely cause any physical harm and no requirements for their control are included in State or federal air quality regulations, the ICAPCD has no rules or standards related to odor emissions, other than its nuisance rule (OB-1 2020).

The construction and operation of a hay processing facility is not an odor producer nor is the facility located near an odor producer. A less than significant impact would occur regarding emissions adversely affecting a substantial number of people (OB-1 2020).

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

IV. ***BIOLOGICAL RESOURCES*** ***Would the project:***

	PSI	PSUMI	LTSI	NI
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

a) The proposed project site is located within the Burrowing Owl Species Distribution Model per Figure 2 "Imperial County Sensitive Species" of the Imperial County Conservation and Open Space Element, however no undisturbed habitat is present on the 160-acre BRS1 site. Burrowing owls (*Athene cunicularia*) create habitats, typically in the brims and banks of agricultural fields. Thus, burrowing owls may be present in the berms and banks of the IID E Drain along the northern property line and the D Lateral adjacent to the southern property line. The proposed amendment to the CUP would not disturb any portion of the berm and banks of these off-site IID facilities. Therefore, the amended CUP is anticipated to have less than significant impacts to have an 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 Wildlife or U.S. Fish and Wildlife Service. Less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

b) As commented above, under item a), the proposed project site is located within the Burrowing Owl Species Distribution Model, however no undisturbed habitat is present on the 160-acre BRS1 site. The IID E Drain is located along the northern property line and the D Lateral is adjacent to the southern property line. These features do not include riparian habitat and would not be impacted by the amending the existing CUP. Therefore, less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

c) As discussed under item a) above, the proposed project site is completely disturbed and developed with hay processing and storage facilities. No federally protected wetlands are present within the boundaries of the 160-acre Project parcel. Therefore, the Project would have no impact on federally protected wetlands. No impacts are expected.

	PSI	PSUMI	LTSI	NI
d) Interfere substantially with the movement of any 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?	☐	☐	☒	☐

d) The proposed project site is 160-acres and is surrounded by agricultural lands and IID drains. The existing hay processing operation has been in operation since early 2016. Thus, the Project site has limited value as a potential wildlife corridor or habitat linkage for most wildlife species. As such, it is not likely that the Project site would serve as an important wildlife corridor or habitat linkage for larger mammals and species that are limited to native habitats. Impacts with regard to interfering with the movement of wildlife are considered less than significant.

	PSI	PSUMI	LTSI	NI
e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

e) As discussed under item a) above, the Project site is completely disturbed and developed with hay processing and storage facilities. The amended CUP is anticipated to less than significant impact with regard

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

to local policies or ordinances protecting burrowing owl.

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?	☐	☐	☒	☐

f) The proposed project site is not located within a local, regional, or state conservation planning area. Amendment of the existing CUP would have less than significant impact on an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan, or other approved local, regional, or state HCP. Therefore, less than significant impacts are expected.

V. *CULTURAL RESOURCES* *Would the project:*

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐

a) The Project site is completely disturbed and developed with existing hay processing and storage facilities. Based on the existing conditions on the Project site, no historical resources are present. Less than significant impact would occur in association with the proposed Project.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐

b) The Project site has been extensively disturbed by decades of agricultural activities and is currently disturbed and developed with the existing hay processing and storage facility. Any archaeology that was present may have been altered. The Project does not involve deep excavation or substantial earth movement in association with amending the CUP. Therefore, the Project is not expected to have a significant impact with regard to an archeological resource; therefore, less than significant impacts are expected.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

c) As described in item a) above, it is not likely that human remains would be found on the proposed site based on years of disturbance. No excavation is proposed as part of the amending the existing CUP. Therefore, less than significant impact to human remains is anticipated.

VI. *ENERGY* *Would the project:*

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

a) The proposed Project would amend the existing CUP for BRS1 to address issues of non-conformance associated with operation of the hay processing facility. No new construction is proposed. Energy is currently used to operate the hay press and other on-site facilities. Diesel and gasoline are used for haul trucks and pick-up trucks. Energy needs would continue to be limited to diesel fuel and gasoline for trucks and equipment and electricity for the hay press. Diesel, gasoline and electricity are currently available in adequate supplies with no shortages and are being used to operate the facility. Additional truck trips to haul raw material and finished product would be allowed under the amended CUP. Diesel fuel consumption would increase commensurate the expanded number of truck trips allowed as part of the amended CUP to move the additional volume of raw product and finished product. Diesel fuel and electricity supply is available in Imperial County with no shortages. No additional electrical generation would be needed for the amended CUP. The Project produces pressed hay that would be shipped to foreign markets. Thus, energy use associated with pressing and shipping hay (i.e. diesel fuel to haul material, electricity to operate the press) is not considered wasteful, inefficient, or unnecessary use of energy resources. This impact is considered less than significant.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

b) The proposed Project is not located within a Renewable Energy Overlay Zone as depicted on the County's Renewable Energy Map (http://www.icpds.com/?pid=577). The proposed Project would amend the existing CUP for BRS1 and would not convert land identified for development as a renewable energy project. The amended CUP would bring operations of the facility into compliance with the conditions of the CUP and would not conflict with any state or local plan regarding energy efficiency. Therefore, any impact would be less than significant.

VII. ***GEOLOGY AND SOILS Would the project:***

	PSI	PSUMI	LTSI	NI
a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:	☐	☐	☒	☐
1) 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?	☐	☐	☒	☐

1) The Project site is not located in an Alquist-Priolo Earthquake Fault Zone as show on the CGS Information Warehouse: Regulatory Maps (CGS 2019a). No known faults are identified as aligning through or directly adjacent to BRS1. Thus, impacts associated with a known earthquake fault are considered less than significant with regard to the Project.

	PSI	PSUMI	LTSI	NI
2) Strong Seismic ground shaking?	☐	☐	☒	☐

2) The primary seismic hazard at BRS1 is the potential for strong ground shaking during earthquakes along the Brawley Fault. The amendment of the existing CUP does not include buildings or habitable structures that could be damaged in a seismic event. Instead, the Project would result in correcting non-compliance issues with the current CUP. Thus, impacts resulting from strong seismic shaking are considered less than significant.

	PSI	PSUMI	LTSI	NI
3) Seismic-related ground failure, including liquefaction and seiche/tsunami?	☐	☐	☒	☐

3) The BRS1 site is currently surrounded by undeveloped agricultural land. Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as those produced by earthquakes. No habitable structures are proposed as part of the amended CUP. Existing structures have been engineered based on soil conditions on the BRS1 site. Therefore, impacts associated with liquefaction are considered less than significant.

	PSI	PSUMI	LTSI	NI
4) Landslides?	☐	☐	☐	☒

4) The proposed project site is flat and surrounded by graded and planted agricultural fields. The California Geologic Survey Information Warehouse: Landslides website does not identify any landslide areas within or near the project site (CGS 2019b). Therefore, no impact would occur with regard to landslides.

	PSI	PSUMI	LTSI	NI
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒

b) The proposed project site is currently compacted soil with hay processing facilities, storage barns and ancillary facilities. The proposed amended CUP does not include any construction or activities that would result in soil erosion. No impact is expected to occur with regard to substantial soil erosion.

	PSI	PSUMI	LTSI	NI
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 landslides, lateral spreading,	☐	☐	☒	☐

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

subsidence, liquefaction or collapse?

c) The proposed project site has been graded and compacted to accommodate the existing hay processing and storage operation. The proposed amendments to the CUP do not include modifications to the BRS1 facility. Amendment of the CUP is not expected to have a significant impact with regard to landslides, lateral spreading, subsidence, liquefaction or collapse. Therefore, less than significant impacts are expected.

		PSI	PSUMI	LTSI	NI
d)	Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?	☐	☐	☒	☐

d) Soils underlaying the proposed project site consist of Imperial Silty Clay, Wet. The clay content results in a high shrink-swell potential which can damage building foundations. However, the proposed Project would amend the existing CUP to address issues of non-compliance and does not include any new structures, habitable or non-habitable. Therefore, direct and indirect risk to life and property are considered less than significant.

		PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐

e) Per ICPH comment letter dated March 10, 2020, the applicant must upgrade their septic systems to support the proposed 100 employees at their sites and thereby comply with Imperial County Ordinance 8.80.170.B(2). The existing project site is currently served by two on-site septic systems; therefore, less than significant impacts are expected to occur.

		PSI	PSUMI	LTSI	NI
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

f) The proposed amendment to the proposed project CUP does not require any deep excavation which could expose any previously unknown paleontological resources. If there would be an impact, it would be less than significant.

VIII. ***GREENHOUSE GAS EMISSION*** ***Would the project:***

		PSI	PSUMI	LTSI	NI
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

a) The Project would generate operational GHG emissions both on and off site (OB-1 2020). On-site activities GHG emissions would be generated primarily by on-site diesel equipment, e.g. forklifts, loaders, and water truck. Off-site GHG emissions would primarily come from heavy-duty diesel trucks with the majority generated by product being hauled from the field to the Project site (OB-1 2020). GHG emissions were estimated using methodologies listed for criteria emissions (refer to GHG analysis in Appendix A of **Attachment 1**). **Table GHG-1** summarizes Project operational GHG emissions. The Project would generate GHG emissions that may have a significant impact on the environment. Detailed calculations are presented in Appendix A of **Attachment 1**).

TABLE GHG-1
PROJECT OPERATIONAL GHG EMISSIONS

Emissions Sources	***CO2***	***CH4***	***N2O***	***CO2e***
Off-site sources	*3,404.6*	*0.022*	*0.430*	*3,533.2*
On-site sources	*720.8*	*0.233*	*N/A*	*726.6*
Total	***4,125.4***	***0.255***	***0.430***	***4,260.0***

Source: OB-1 2020, p. 31.

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The Project would generate GHG emissions that may have a significant impact on the environment if reduction strategies were not incorporated (OB-1 2020). However, the ICAPCD has determined that compliance with applicable State GHG emission reduction strategies would constitute feasible mitigation. **Table GHG-2** presents Project's design that demonstrate compliance with applicable State GHG strategies presented in the Climate Action Team Report.

Implementation of the applicable design and mitigation strategies as shown in the table would result in a less than significant impact of Project GHGs to the environment (OB-1 2020).

Table GHG-2
California Greenhouse Gas Emission-Reduction Strategies

Strategy	Project Design/Mitigation to Comply with Strategy
Vehicle Climate Change Standards: AB 1493 (Pavley) required the State to develop and adopt regulations to achieve the most feasible and cost-effective reduction in climate change emissions emitted by passenger vehicles and light-duty trucks. Regulations were adopted by CARB in September 2004.	These are CARB-enforced standards; vehicles subject to these standards/measures that would access the proposed project would be complying.
Other Light-duty Vehicle Technology: New standards would be adopted and phased in beginning in the 2017 model year.	
Heavy-duty Vehicle Emission Reduction Measures: Increased efficiency in the design of heavy-duty vehicles and an educational program for the heavy-duty vehicle sector.	
Diesel Anti-Idling: In July 2004, CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	This is a CARB-enforced measure; vehicles subject to this measure that would access the proposed project would be complying.
Hydrofluorocarbon (HFC) Reduction: 1) ban retail sale of HFC in small cans, 2) require that only low-Global Warming Potential refrigerants be used in new vehicular systems, 3) adopt specifications for new commercial refrigeration, 4) add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs, 5) enforce Federal ban on releasing HFCs.	Not applicable.
Transportation Refrigeration Units (TRUs), Off-road Electrification, Port Electrification: Strategies to reduce emissions from TRUs, increase off-road electrification, and increase use of shore-side/port electrification.	Not applicable.
Manure Management: The proposed San Joaquin Valley Rule 4570 would reduce volatile organic compounds from confined animal facilities through implementation of control options.	Not applicable.
Alternative Fuels – Biodiesel Blends: CARB would develop regulations to require the use of 1% to 4% biodiesel displacement in California diesel fuel.	Not applicable.

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Alternative Fuels – Ethanol: Increased use of ethanol fuel.	Not applicable.
Achieve 50% Statewide Recycling Goal: Achieving the State's 50% waste diversion mandate, as established by the Integrated Waste Management Act of 1989 (AB 939 [Sher]), Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy-intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	Not applicable.
Zero Waste – High Recycling: Additional recycling beyond the State's 50%	Not applicable.
Landfill Methane Capture: Implement direct gas use or electricity projects at landfills to capture and use emitted methane.	Not applicable. The proposed project does not include landfill operations.
Urban Forestry: A new statewide goal of planting 5 million trees in urban areas by	Not applicable. The proposed project is not in an urban area.
Afforestation/Reforestation Projects: Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	Not applicable. The proposed project area has not been forested in recent times.
Water Use Efficiency: 19% of all electricity, 30% of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute, and use water and wastewater. Increasing the efficiency of water transport and reducing water usage would reduce GHG emissions.	Not applicable. The project is not a water supply entity.
Building Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the California Energy Commission (CEC) to adopt and periodically update its building energy efficiency standards, which apply to newly constructed buildings and additions and alterations to existing buildings.	Not applicable. The project does not include any construction activity.
Appliance Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes CEC to adopt and periodically update its appliance energy efficiency standards, which apply to equipment and devices that use energy and are sold or offered for sale in California.	Not applicable. The project does not include new appliance acquisition.
Cement Manufacturing: Cost-effective actions to reduce energy consumption and lower carbon dioxide emissions in the cement industry.	Not applicable. The proposed project does not include cement manufacturing

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

Smart Land Use and Intelligent Transportation Systems (ITS): Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. It is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and services. Governor's office is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through State investments, incentives, and technical assistance, land use and technology strategies that provide for a prosperous economy, social equity, and a quality environment. Smart land use, demand management, ITS, and value pricing are critical elements for improving mobility and transportation efficiency. Specific strategies include promoting jobs/housing proximity and transit-oriented development, encouraging high-density residential/commercial development along transit/rail corridors, value and congestion pricing, ITS, traveler information/traffic control, incident management, accelerating the development of broadband infrastructure, and comprehensive, integrated, multimodal/intermodal transportation planning.	Not applicable. The project is not in a metropolitan or urban area.

Enteric Fermentation: Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.	Not applicable. The project does not include any cattle operations.
Green Buildings Initiative: Green Building Executive Order S-20- 04 sets a goal of reducing energy use in public and private buildings by 20% by 2015 compared with 2003 levels. Consistent with mitigation.	Not applicable. The project does not include any construction activity.
California Solar Initiative: Installation of 1 million solar roofs on homes and businesses, or an equivalent 3,000 megawatts, by 2017; increased use of solar thermal systems to offset the increasing demand for natural gas; use of advanced metering in solar applications; and the creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	Not applicable. The project does not include any construction activity.

Source: OB-1 2020

		PSI	PSUMI	LTSI	NI
b)	Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

b) Neither the County of Imperial nor ICAPCD have any specific plans, policies, nor regulations adopted for reducing the emissions of GHGs but CARB's First Update to their Scoping Plan included a table presenting the recommended actions the State should take in each of the sectors to meet our climate change goals. The Project does not conflict with any of these recommended actions. Since the operational and construction emissions associated with the Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs, this impact is considered less than significant.

IX. *HAZARDS AND HAZARDOUS MATERIALS* *Would the project:*

		PSI	PSUMI	LTSI	NI
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

a) Limited quantities of hazardous materials including hydraulic fluid, diesel and gasoline are used and stored on the BRS1 site. These materials are used for forklifts and fueling trucks hauling raw hay and finished product. These hydraulic fluid, diesel and gasoline are subject to the facility's Hazardous Materials Business Plan. Two fuel storage tanks are currently on the site but no new tanks are proposed as part of the amended CUP. A less than significant impact is identified with regard to routine transport, use and disposal of hazardous materials.

		PSI	PSUMI	LTSI	NI
b)	Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

b) As mentioned in item a), above, less than significant impacts are expected with regard to routine transport, use and disposal of hazardous materials.

		PSI	PSUMI	LTSI	NI
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

c) The proposed project site is not located within one-quarter mile of an existing school nor would the proposed Project may emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a proposed school. Therefore, if there would be any impact it would be less than significant.

		PSI	PSUMI	LTSI	NI
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?	☐	☐	☐	☒

d) The proposed project site is not located on a site that is included on a list of hazardous materials sites compiled per Imperial County Seismic and Public Safety Element, Figure 5- Hazardous Material Sites. Therefore, no impact is identified for this issue area.

		PSI	PSUMI	LTSI	NI
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐

e) The proposed project site is within the outer boundary of the Calipatria Airport Land Use Plan in both Zone C (Common Traffic Pattern, an area of limited risk for aircraft at or below 1,000 feet above ground level) and Zone D (Other Airport Environs, an area of negligible rise) (Imperial County 1996, p. 2-17). The Cliff Hatfield Memorial Airport is approximately 1.5 miles to the west and the Calipatria Municipal Airport is approximately 1.25 miles to the west. The BRS1 facility is currently in operation and the amended CUP the project is not expected to create a safety hazard, drastically increase noise or conflict with the Airport Land Use Plan permitted density . Noise levels at the site are currently high and employees working at BRS1 wear ear protection to reduce exposure. Thus, if there would be any impact, it would be less than significant.

		PSI	PSUMI	LTSI	NI
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

f) The proposed amended CUP is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project site has two driveways on the west along Blair Road. All in-bound trucks turn into a deceleration lane off of Blair Road. The main access driveway that leads to the guardhouse is north of the deceleration driveway. The main access is used only by visitors and pick-up trucks, not haul trucks. An emergency access with a Knox Box is along SR 115 to the southeast of the fuel tanks and shop building. Thus, the proposed Project would not impair the implementation of, or physically interfere with, any adopted emergency response plan or emergency evacuation plans. If there would be an impact, it would be less than significant.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

g) Fire protection and emergency medical services in the area are provided by the Imperial County Fire Department (ICFD). According to the Draft Fire Hazard Severity Zones in the Local Responsibility Area Map prepared by the California Department of Forestry and Fire Protection in 2007, the proposed project site is designated to as a Moderate Fire Hazard Severity Zone (CDF 2007). The site is surrounded by agricultural fields and irrigation infrastructure and the project site currently has a 100,000-gallon steel water storage tank located on the southern portion of the parcel. The water tank is equipped with an ICFD-approved 1,500 gallon per minute electric fire pump and redundant back-up diesel pump. All storage barns are equipped with a fire sprinkler system. Therefore, the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires is considered less than significant.

X. ***HYDROLOGY AND WATER QUALITY*** ***Would the project:***

	PSI	PSUMI	LTSI	NI
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

a) All runoff from the facility is contained on-site in two detention basins on the southern portion of the site south of the hay press and parallel to SR 115. Flows captured in the basins flow to the north and are discharged to IID E Drain at the northwest corner or the parcel. Therefore, a less than significant impact would occur with regard to degrading surface or groundwater quality.

	PSI	PSUMI	LTSI	NI
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

b) The proposed project site uses water supplied by IID for dust control and fire suppression water. Fondomonte has an encroachment permit to draw water from the D lateral. Potable water for consumption, fire suppression and chiller equipment is provided by the Golden State Water Company. Groundwater recharge would not be interfered with as the Project site includes primarily compacted soil which allows for water infiltration and two detention basins that discharge to the IID E Drain. No groundwater would be used in association with the amended CUP nor would additional impervious surface be added that could affect recharge. Therefore, any impact to a groundwater management basin would be considered less than significant.

	PSI	PSUMI	LTSI	NI
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:	☐	☐	☒	☐

c) The proposed project is not expected to 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. Additionally, no construction is anticipated; therefore, less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

(i) The Project site is a combination of compacted soil, concrete access roads, and buildings (shop, finished hay, etc.). The amendment of the existing CUP would not alter existing drainage patterns or add impervious surfaces to the Project site. No streams or rivers are on are adjacent to the Project site that could be subject to siltation. Therefore, no impact may occur with regard to substantial erosion or siltation. Any impact would be considered less than significant.

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	Potentially Significant Impact **(PSI)**	Potentially Significant Unless Mitigation Incorporated **(PSUMI)**	Less Than Significant Impact **(LTSI)**	No Impact **(NI)**
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒

(ii) The existing drainage characteristics of the Project site will remain unchanged with the amendment of the existing CUP. As a result, the Project would have no impact with regard to increasing the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. No impacts are expected.

	PSI	PSUMI	LTSI	NI
(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;	☐	☐	☒	☐

(iii) The proposed amendment to the existing CUP would result in no change in runoff as described in item ii), above. The site will remain compacted soil, concrete access roads, and buildings with no additional impervious surfaces proposed as part of the amended CUP. Runoff from the detention basins will drain to the north and be discharged to IID E Drain at the northwest corner or the parcel. Thus, the proposed Project is not expected to substantially alter the existing drainage pattern of the site, substantially increase the rate of runoff, or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Therefore, if there would be any impact, it would be less than significant.

	PSI	PSUMI	LTSI	NI
(iv) impede or redirect flood flows?	☐	☐	☐	☒

(iv) The proposed Project would not impede or redirect surface flows on the Project site through adding more impervious surfaces or buildings. The majority of soils would remain unpaved and pervious. Therefore, no impact would occur with regard to impeding or redirecting flows.

	PSI	PSUMI	LTSI	NI
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

d) The Project site is approximately 110 miles east of the Pacific Ocean and approximately 10 miles southeast of the Salton Sea, the nearest large water body. Due to the distance from these water bodies, there is no significant danger of inundation from tsunami or seiche related to the Project site. Thus, no impact is identified for these issues.

	PSI	PSUMI	LTSI	NI
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

e) As discussed under item a), above, all runoff from the Project site will be detained on site in two detention basins before being discharged to IID E Drain at the northwest corner or the parcel. Therefore, the proposed Project would have less than significant impact on implementation of a water quality control plan or sustainable groundwater management plan.

XI. ***LAND USE AND PLANNING Would the project:***

	PSI	PSUMI	LTSI	NI
a) Physically divide an established community?	☐	☐	☐	☒

a) The proposed project is located approximately one-half mile from the eastern boundary of the City of Calipatria and it is not expected to physically divide an established community. No impacts are expected.

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐

b) The proposed Project site is zoned A-2 (General Agricultural) and designated Agriculture on the Imperial County Land Use Map (Imperial County 2019a). The Project is submitting an amended CUP application to address non-compliance issues. Therefore, conflicts with an applicable land use plan are considered less than significant.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

XII. ***MINERAL RESOURCES Would the project:***

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☐	☒

a) The Project site has been developed with the existing hay press and supporting facilities since the end of 2015 with operations beginning in early 2016. According to Figure 6 "Imperial County Existing Mineral Resources" of the Conservation and Open Space Element of the County of Imperial General Plan (County of Imperial 2016), no known mineral resources occur within the Project site nor are there any mapped in the immediate vicinity of the proposed project site. Thus, no impact is identified with regard to mineral resources.

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☐	☒

b) As commented on item a) above, no impact is identified with regard to mineral resources.

XIII. ***NOISE Would the project result in:***

	PSI	PSUMI	LTSI	NI
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

a) Long-term operational noise levels would increase on the BRS1 site and along the truck routes when the maximum number of trucks allowed by the amended CUP are traveling to and from the site; however, BRS1 is surrounded by agricultural land and no sensitive receptors are located on or adjacent to the site. The nearest residence is one-half mile to the east along SR 115 and therefore, proposed Project is not expected to impact existing noise levels for a substantial number of adjacent landowners. The proposed project site is also located within a "Noise Impact Zone" under the Noise Element of the Imperial County General Plan as it is adjacent to Highway 115. In addition, Table 7 of the Noise Element indicates that conditionally acceptable noise levels for an agriculture land use is up to 75 db Leq. Therefore, compliance with the Noise Element would reduce impacts to a level less than significant.

	PSI	PSUMI	LTSI	NI
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

b) Generation of excessive groundborne vibration or groundborne noise levels are not expected with the proposed amendments to the existing CUP; besides, the surrounding area is mostly agriculture land uses, with minimal amounts of people in the vicinity of the proposed facility. Therefore, less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐

c) BRS1 is within two miles of a public airport or a private airstrip. The Cliff Hatfield Memorial Airport is located at 440 West Main Street in Calipatira, approximately 1.75 west of BRS1 and the Calipatria Municipal Airport is approximately 1.25 miles to the west of BRS1. Employees at BRS1 are currently exposed to noise in association with operation of the hay press and movement of raw and finished hay. Both airports are small and do not have a high volume of flights. All employees wear ear protection to guard against hearing damage. Therefore, the proposed project is not expected to expose people working in the project area to excessive noise levels.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

XIV. ***POPULATION AND HOUSING*** ***Would the project:***

	PSI	PSUMI	LTSI	NI
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

a) The proposed project it is non-residential, proposed on non-residential lands and will not substantially alter the local population or infrastructure; therefore, less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

b) The proposed project does not propose to displace any substantial existing housing necessitating the construction of replacement housing elsewhere. Therefore, no impacts are anticipated.

XV. ***PUBLIC SERVICES***

	PSI	PSUMI	LTSI	NI
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☒	☐

a) The proposed project is an existing hay process facility, minimal potential impacts are foreseen on public services. Therefore, less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
1) Fire Protection?	☐	☐	☒	☐

1) The Project site is within the jurisdiction of the Imperial County Fire Department. On-site fire water storage is available in a 100,000-gallon water tank equipped with an Imperial County Fire Department (ICFD)-approved 1,500 gallon per minute electric fire pump and redundant back-up diesel pump. All buildings except for the guard house and shop are equipped with fire sprinklers with fully automated controls and alarms. All barns are plumbed with sprinklers. A complete fire loop was constructed around the BRS1 site connected to the pressurized fire water supply, including fire hydrants and automated sprinkler systems. Therefore, impacts to fire protection are considered less than significant.

	PSI	PSUMI	LTSI	NI
2) Police Protection?	☐	☐	☒	☐

2) The Project site is within the jurisdiction of the Imperial County Sheriff's Department. The entire BRS1 facility is surrounded with an 8-foot high chain-link fence and has night lighting throughout the site. Shielded flood lights are on all buildings for safety and overhead lights are located near the entry, at the shop, finished hay area and all paved areas throughout the site. A guard house (staffed 24-hours a day) is located at the main entrance off Blair Road and an emergency access is present along SR 115 outfitted with a Knox Box. Based on existing securing features at the facility, including on-site 24-hour security, impacts to police protection are anticipated to be less than significant in association with the amended CUP.

	PSI	PSUMI	LTSI	NI
3) Schools?	☐	☐	☐	☒

3) The amendment to the CUP would have no impact on schools because it neither includes a residential component nor would it generate the need for new housing to accommodate workforce population. The Project is an amendment to the existing CUP to address non-compliance issues. As such, the proposed Project would not have an adverse physical effect on the environment resulting from construction of a new school, park or other public facility. Therefore, no impact is identified for this issue area.

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	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
4) Parks?	☐	☐	☐	☒

4) As stated above under item 3), no impacts are identified for this area.

	PSI	PSUMI	LTSI	NI
5) Other Public Facilities?	☐	☐	☐	☒

4) As stated above under item 3), no impacts are identified for this area.

XVI. ***RECREATION***

	PSI	PSUMI	LTSI	NI
a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

a) The proposed Project would amend the existing CUP to address non-compliance issues which include exceeding the permitted quantities of the following: the amount of raw hay stored on site; the number of truck round-trips to the site; the number of container truck trips going out of the site; the number of employee round trips; and the number of employees working at the facility. The amendments do not include an increase in population that would increase use of existing or neighborhood parks. Thus, no impact is identified for these issues.

	PSI	PSUMI	LTSI	NI
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	☐	☐	☐	☒

b) The proposed Project is the amendment of the existing BRS1 CUP and does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact to the environment as a result of construction and expansion of recreational facilities would occur in association with the proposed Project.

XVII. ***TRANSPORTATION*** ***Would the project:***

	PSI	PSUMI	LTSI	NI
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

a) To assess potential impacts to the surrounding roadway network and intersections, a Traffic Impact Assessment (LLG 2019) was prepared for the amended CUP. This report is included in **Attachment 2** to this document. Based on the Project site's rural location, there are no transit, bicycle or pedestrian facilities . The analysis of all study area intersections and segments under all analysis scenarios results in LOS B or better operations with the addition of Project traffic. Hence, less than significant impacts are expected.

	PSI	PSUMI	LTSI	NI
b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

b) The County of Imperial has not yet adopted vehicle miles traveled (VMT) as the metric for assessing transportation impacts. Jurisdictions have until July 1, 2020 to adopt the VMT metric. In the interim, the County continues to use Level of Service. Per Traffic Impact Assessment (LLG 2019) the Project is not expected to conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b, therefore, if it would be an impact, it would be less than significant.

	PSI	PSUMI	LTSI	NI
c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

c) The proposed project is not expected to substantially increases hazards due to a geometric design feature since no structures are proposed nor incompatible uses since no changes to the existing use are proposed. No impacts are expected.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
d) Result in inadequate emergency access?	☐	☐	☒	☐

d) The project site facility has two driveways on the west along Blair Road. All in-bound trucks turn into a deceleration lane off Blair Road. An emergency access with a Knox Box is along SR 115 to the southeast of the fuel tanks and shop building. The amended CUP would not alter existing emergency access in any way. Thus, any impact would be considered less than significant.

XVIII. *TRIBAL CULTURAL RESOURCES*

	PSI	PSUMI	LTSI	NI
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:	☐	☐	☒	☐

a) The proposed project does not anticipate any new construction and it is not expected cause a substantial adverse change in the significance of a tribal cultural resource; if there would be an impact it would be less than significant.

	PSI	PSUMI	LTSI	NI
(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐

(i) The proposed project site has been graded and is developed with a hay press, hay barns and supporting buildings and infrastructure. The site is not listed or may not be eligible for listing in the California Register of Historical Resources, or in a local register or historical resources. Any impact would be considered less than significant.

	PSI	PSUMI	LTSI	NI
(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 is 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.	☐	☐	☒	☐

(ii) The proposed project is in an existing hay facility and no new structures are being proposed, additionally, a Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1(d) was conducted with the California Native American tribes traditionally and culturally affiliated with the project area and no comments were received. Therefore, if there would be any impact it would be less than significant.

XIX. *UTILITIES AND SERVICE SYSTEMS* ***Would the project:***

	PSI	PSUMI	LTSI	NI
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

a) Per Imperial County Public Health Department (ICPHD) comment letter, applicant shall upgrade their septic system to support the proposed 100 employees and thereby comply with Imperial County Ordinance 8.80.170.B (2). Compliance with ICPHD requirements would bring any impacts related to the construction of

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

service systems of which could cause significant environmental effects to less than significant.

	PSI	PSUMI	LTSI	NI
b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

b) BRS1 has two sources of water for the current operations. Potable water for consumption, fire suppression and chiller equipment are provided by the Golden State Water Company. Water for dust control is provided by the IID. Fondomonte has an encroachment permit to draw water from the D lateral. The amended CUP would not request a significant additional water. Therefore, less than significant impacts are expected related to water supply.

	PSI	PSUMI	LTSI	NI
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

c) As stated under item a) above, compliance with ICPHD would bring any impact to less than significant.

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐

d) The amended CUP would allow for an increase from 49 employees to up to 100 employees (an additional 51 employees). The increase in employees would result in a commensurate increase in solid waste. The facility currently contracts with Allied Waste for solid waste pick up. Recycling bins are available on the site to reduce the quantity of solid waste generated. Some additional chaff would also be generated in association with the increase of 35,000 standard tons of raw hay. The chaff is recycled and pressed into the bales. The increase in solid waste resulting from the additional employees allowed under the amended CUP is considered less than significant.

	PSI	PSUMI	LTSI	NI
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

e) As commented under item d) above, less than significant impacts are related with regulations related to solid waste. Therefore, less than significant impacts are expected.

XX. *WILDFIRE*

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

	PSI	PSUMI	LTSI	NI
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

a) The proposed project site is in a rural agricultural portion of Imperial County. The closest city is Calipatria which is approximately one-half mile to the west of the western boundary of the project site. The site is approximately 1 mile west of SR 111 and it is not nexpected impair an adopted emergency response plan or emergency evacuation plan. A less than significant impact is expected.

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐

b) The proposed project site is surrounded by agricultural land. The site has been graded and is developed with two hay presses, hay barns and supporting buildings and utilities. The area is classified as a Moderate Fire Hazard Severity Zone on the Imperial County Draft Fire Hazard Severity Zones in LRA map (CDF 2007). Potential for uncontrolled wildfire is unlikely given the flat topography and irrigated agriculture as well as the irrigation canals and drains surrounding the project site. In addition, BRS1 has on-site fire-fighting features including sprinklers at all hay barns and an on-site 100,000-gallon fire water storage tank equipped with an

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

ICFD-approved 1,500 gallon per minute electric fire pump and redundant back-up diesel pump. The nearest population center is the City of Calipatria approximately one-half mile to the west. No employee housing is present on-site. Therefore, Project is not likely to expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Less than significant impacts are expected to occur.

	PSI	PSUMI	LTSI	NI
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

c) The proposed Project would amend the existing CUP for BRS1 to address non-compliance issues. The proposed amended of the CUP is not expected to require installation or maintenance of infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, if there would be any impact, it would be less than significant.

	PSI	PSUMI	LTSI	NI
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?	☐	☐	☒	☐

d) The proposed project site is located on flat land in the Imperial Valley. No impact is expected to occur that would result in exposing 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. Therefore, if there would be any impact, it would be less than significant.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

	PSI	PSUMI	LTSI	NI
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☑	☐
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.)	☐	☐	☑	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☑	☐

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IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Mariela Moran, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office

B. OTHER AGENCIES/ORGANIZATIONS

- Imperial Irrigation District

C. ENGINEER AND TECHNICAL STUDIES

- Anastasia Miki, Principal Engineer. WRA Consulting Engineers
- Joe O'Bannon, Principal, OB-1 Air Analysis (Air Quality/Greenhouse Gases)
- John A. Boarman, Principal, LLG, Inc. (Traffic)

(Written or oral comments received on the checklist prior to circulation)

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V. REFERENCES

California Department of Transportation (Caltrans) 2019. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. "List of eligible and officially designated State Scenic Highways." Accessed March 26, 2020. Referenced in text as (Caltrans 2019).

California Department of Conservation. Division of Land Resource Protection, Farmland Mapping and Monitoring Program. 2017. "Imperial County Important Farmland 2016". Published June 2017. Referenced in Text as (DOC 2017).

California Department of Forestry and Fire Protection, 2007. "Imperial County Draft Fire Hazard Severity Zones in LRA". September 19, 2007. Referenced in text as (CDF 2007).

California Geologic Survey Information Warehouse: Landslides. https://maps.conservation.ca.gov/cgs/informationwarehouse/landslides. Accessed March 26, 2020. Referenced in text as (CGS 2019a)
Regulatory Maps.
https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/
Accessed March 26, 2020. Referenced in text as (CGS 2019b).

County of Imperial. 2016. "Conservation and Open Space Element." March 8, 2016. Referenced in text as (Imperial County 2016).

Imperial County Planning and Development Services Department. 2016. Initial Study & Environmental Analysis for Conditional Use Permit #16-0017, Fondomonte California, LLC. September 2016. Referenced in text as (ICPDS 2016).
2007. Imperial County Land Use Plan. Adopted November 9, 1993. Updated March 1, 2007. Referenced in text as (Imperial County 2007).

Imperial County General Plan Land Use. http://icpds.maps.arcgis.com/apps/Viewer/index.html?appid=0b3d07a31d5346919f3ea89ed2bc3940
Accessed March 26, 2020. Referenced in text as (Imperial County 2019a).

Lindscott, Law & Greenspan. 2019. Traffic Impact Analysis, Blair Ranch Project, Calipatria, California. November 8, 2019. Referenced in text as (LLG 2019).

OB-1 Air Analysis. 2019. Air Quality Impact Assessment, Calipatria Press Project, Imperial County, California. January 2020. Referenced in text as (OB-1 2020).

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VI. NEGATIVE DECLARATION – County of Imperial

The following Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.

Project Name: Conditional Use Permit #20-0002

Project Applicant: Fondomonte California LLC

Project Location: 6456 Blair Road, Calipatria

Description of Project: Applicant is proposing to replace existing Conditional Use Permit #16-0017 to increase the number of employees to 100, and the total trucks hauling hay in to 100 trucks/day and away to the rail with 60 trucks/day. The total tonnage stored on site is proposed to increase annually to 110,000 tons.

VII. FINDINGS

This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environmental and is proposing this Negative Declaration based upon the following findings:

☑ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A NEGATIVE DECLARATION will be prepared.

If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.

NOTICE

The public is invited to comment on the proposed Negative Declaration during the review period.

6-16-2020 For

Date of Determination — Jim Minnick, Director of Planning & Development Services

The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.

6/11/20

Applicant Signature — Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

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ATTACHMENT A

CUP Amendment Project Description, Attachment 1 & 2

EEC ORIGINAL PKG.

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1. PROPERTY OWNER'S NAME Fondomonte California, LLC	EMAIL ADDRESS a.miki@rpeng.net	
2. MAILING ADDRESS (Street / P O Box, City, State) 250 North Litchfield Road Suite 101 Goodyear Az	ZIP CODE 85338	PHONE NUMBER 623-322-5148
3. APPLICANT'S NAME Fondomonte California, LLC	EMAIL ADDRESS a.miki@rpeng.net	
4. MAILING ADDRESS (Street / P O Box, City, State) 250 North Litchfield Road Suite 101 Goodyear Az	ZIP CODE 85338	PHONE NUMBER 623-322-5148
4. ENGINEER'S NAME Anastasia Miki CA. LICENSE NO. 68433	EMAIL ADDRESS a.miki@rpeng.net	
5. MAILING ADDRESS (Street / P O Box, City, State) 212 North First Avenue, Suite 104 Sandpoint Id	ZIP CODE 83864	PHONE NUMBER 208-818-7508

6. ASSESSOR'S PARCEL NO. 023-030-009	SIZE OF PROPERTY (in acres or square foot) 160 acres	ZONING (existing) A3

7. PROPERTY (site) ADDRESS
6546 Blair Road Calipatria

8. GENERAL LOCATION (i.e. city, town, cross street)
NE corner of Blair and Hwy 115

9. LEGAL DESCRIPTION NE Quarter of Section 14, Township 12 South, Range 14 East, SBB & M

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail) We wish to replace our existing CUP to increase our employees to 100, and the total trucks hauling hay in to 100 trucks/day and away to the rail with 60 trucks/day. The total tonnage stored on site to annually to 110,000 tons.

11. DESCRIBE CURRENT USE OF PROPERTY The existing CUP 16-0017

12. DESCRIBE PROPOSED SEWER SYSTEM Septic

13. DESCRIBE PROPOSED WATER SYSTEM Golden State Water

14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM All buildings are sprinkled, except the shop, plus we have a full pressurized fire loop to fire hydrants as approved by ICFD

15. IS PROPOSED USE A BUSINESS? ☒ Yes ☐ No
IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? 100

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT.

Anastasia Miki, per affidavit — 3/5/2020
Print Name — Date

Signature

Print Name — Date

Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE
C. OTHER
D. OTHER

APPLICATION RECEIVED BY:	MM Email	DATE	3/5/2020	REVIEW / APPROVAL BY OTHER DEPT'S required.
APPLICATION DEEMED COMPLETE BY:		DATE		☐ P. W.
APPLICATION REJECTED BY:		DATE		☐ E. H. S.
TENTATIVE HEARING BY:		DATE		☐ A. P. C. D.
FINAL ACTION: ☐ APPROVED	☐ DENIED	DATE		☐ O. E. S

CUP # 20-0002

EEC ORIGINAL PKG.

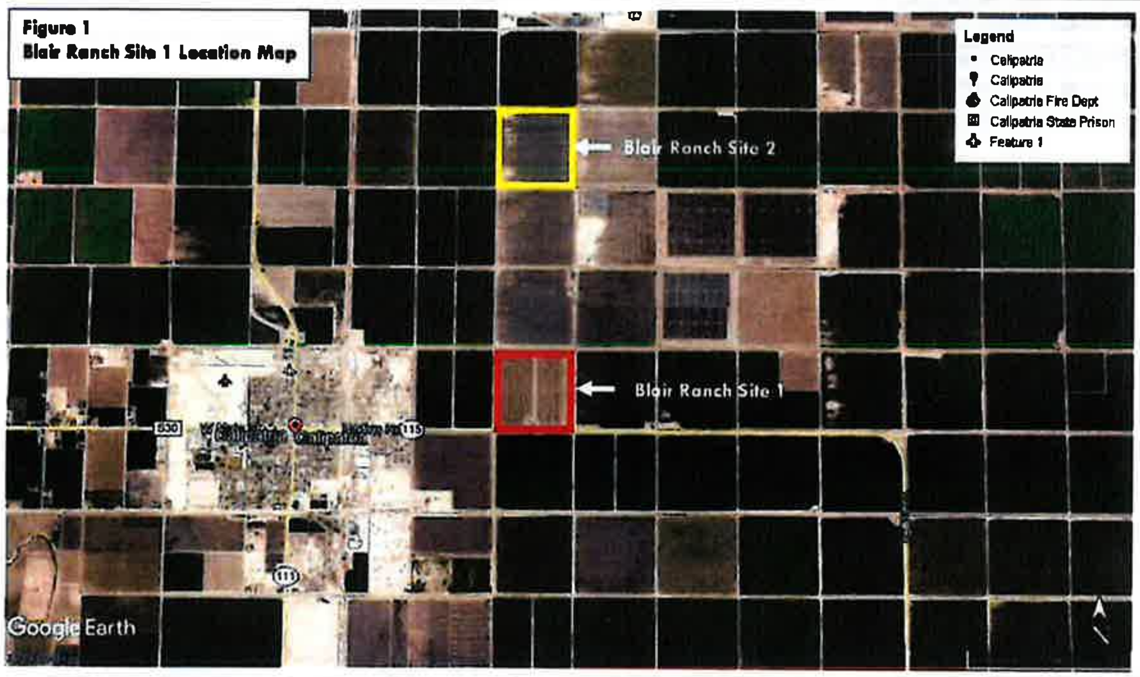
BLAIR RANCH SITE 1 CUP AMMENDMENT - PROJECT DESCRIPTION

Introduction

Fondomonte California, LLC, a Delaware Limited Liability Company (hereafter "Fondomonte"), is proposing to amend its existing Conditional Use Permit (CUP) #16-0017 (recorded November 7, 2016) for the hay processing and storage facility known as Blair Ranch Site 1 (BRS1). The facility is located on a single parcel, (Assessor's Parcel Number [APN] 023-030-009) at 6456 Blair Road, Calipatria in unincorporated Imperial County (**Figure 1**). The western boundary of the parcel is approximately one-half mile from the eastern city limit of Calipatria. BRS1 is bordered by Young Road on the north, State Route 115 on the south, County Road 8113 on the east and Blair Road on the west. The Imperial Irrigation District (IID) E Drain is located along BRS1 northern property line and the D Lateral is adjacent to the southern property line.

Fondomonte is amending the existing CUP to address non-compliance issues which include exceeding the permitted quantities of the following: the amount of raw hay stored on site; the number of truck round-trips to the site; the number of container truck trips going out of the site; the number of employee round trips; and the number of employees working at the facility.

Figure 1
Blair Ranch Site 1 Location Map



Existing Facilities

BRS1 is owned and managed by Fondomonte. The existing hay press occupies approximately 24 acres of the 160-acre parcel. The remainder of the parcel is devoted to hay storage, administration and ancillary buildings, and infrastructure (**Figure 2**). A separate hay storage yard also owned by Fondomonte, known as Blair Ranch Site 2 (BRS2) is located one mile to the north at 6850 Blair Road. BRS2 (commonly referred to as the "Stack Yard") has 51 raw product storage barns with a capacity of 76,500 standard tons.

KEYNOTES

01 EXISTING 12'-0" x 10'-0" GUARD HOUSE (120 SF)
02 EXISTING 26'-8" x 54'-8" CANTEEN BUILDING (1,458 SF)
03 EXISTING 26'-8" x 54'-8" OFFICE BUILDING (1,458 SF)
04 I.I.D. TRANSFORMER
05 EASEMENT LINE
06 PROPERTY LINE
07 EXISTING WATER METER
08 EXISTING EMPLOYEE/PUBLIC PARKING AREA
09 EXISTING LANDSCAPE AREA & ENGINEERED SEPTIC DRAINAGE FIELD SYSTEM BY FUSCOE ENGINEERING
10 EXISTING COMMERCIAL TO RURAL ROAD DRIVEWAY PER COUNTY
11 NOT USED
12 OPEN FIELD FOR STORAGE
13 EXISTING CHAIN LINK FENCE
14 EXISTING 4,000 AMP SERVICE PRIMARY ELECTRIC
15 EXISTING IID METER 400 AMP MA 120 / 240 V, 1" DIA.
16 EXISTING 120'-0" x 180'-0" PRESSED HAY BUILDING
17 EXISTING 70'-0" x 210'-0" STAGING HAY BUILDING
18 EXISTING CONCRETE APRON
19 EXISTING 70'-0" x 60'-0" SHOP BUILDING
20 EXISTING 100,000 GAL. WATER TANK
21 EXISTING EMPLOYEE PARKING AREA (1 AC.)
22 EXISTING 8'-0" HIGH CHAIN LINK FENCE
23 EXISTING 136'-0" x 14'-0" SOUTHERN SCALE. SOUTHWESTERN SCALE: LOW PROFILE SCALE SERIES BY OWNER
24 EXISTING (1) 8'-0"x16'-0" 10,000 GAL DUAL WALL GAS TANK
25 EXISTING 120'-0" x 300'-0" FINISHED HAY BUILDING
26 EXISTING 24'-0" WIDE CONCRETE ACCESS ROAD
27 EXISTING 136'-0" x 14'-0" NORTHERN SCALE. SOUTHWESTERN SCALE: LOW PROFILE SCALE SERIES BY OWNER
28 EXISTING 120'-0" x 300'-0" FINISHED HAY BUILDING
29 EXISTING (2) 2" CONDUIT FOR FIBER OPTIC FOR CAMERA & POTENTIAL CNC CONTROLS
30 EXISTING PULL BOX
31 EXISTING (2) 2" CONDUIT DATA & PHONE
32 EXISTING (3) 3" CONDUIT FOR ELECTRICAL
33 EXISTING SWITCH GEAR AND ELECTRICAL PANEL FOR THE 4,000 AMP SINGLE LINE SERVICE
34 EXISTING (1) 2" CONDUIT FOR DATA
35 EXISTING (4) 2" CONDUIT FOR DATA
36 EXISTING 6" C900 WATER TRUCK FILL LINE
37 EXISTING 12" SDR-35
38 EXISTING PUMP & CONCRETE PAD
39 EXISTING (1) 3" CONDUIT FOR ELECTRICAL
40 EXISTING FILL RISER
41 EXISTING RCP SERVICE PIPE
42 EXISTING 12" DIA. GATE VALVE
43 EXISTING 40'-0" WIDE CONCRETE ACCESS ROAD
44 EXISTING 30'-0" x 40'-0" x 8'-0" HIGH CHAFF CONTAINMENT
45 EXISTING 2" OVERFLOW PIPE
46 EXISTING 4" CONCRETE ROLL OVER BERM CONTAINMENT AREA
47 EXISTING 6" DIA. PIPE BOLLARDS AROUND EVERY FIRE VALVE ON SITE
48 EXISTING 12'-4"x12'10" RESTROOM FACILITY LEAN-TO EXISTING SHOP BUILDING
49 EXISTING 4" DIA. POTABLE WATER
50 EXISTING 4" DIA. WATER LINE FOR EXISTING RESTROOM FACILITY
51 EXISTING 2" DIA. 'T' FOR FUTURE
52 EXISTING (14) 70'-0" x 300'-0" x 21'-0" TALL HAYBARN
53 EXISTING SEPTIC DRAINAGE FIELD SYSTEM
54 EXISTING RESERVE SEPTIC DRAINAGE FIELD SYSTEM
55 EXISTING (3) 3" CONDUITS & (4) 2" CONDUITS
56 (1) #10 THHN IN EXISTING 2" DIA. CONDUIT FEEDING (1) FUEL PUMP, 20 AMP BREAKER, THREE PHASE, WITH A GROUND WIRE #10 AWG COPPER MIN. FROM EXISTING PANEL IN SHOP
57 EXISTING 8" GSW SERVICE
58 EXISTING 2,000 GAL. UNLEADED FUEL TANK

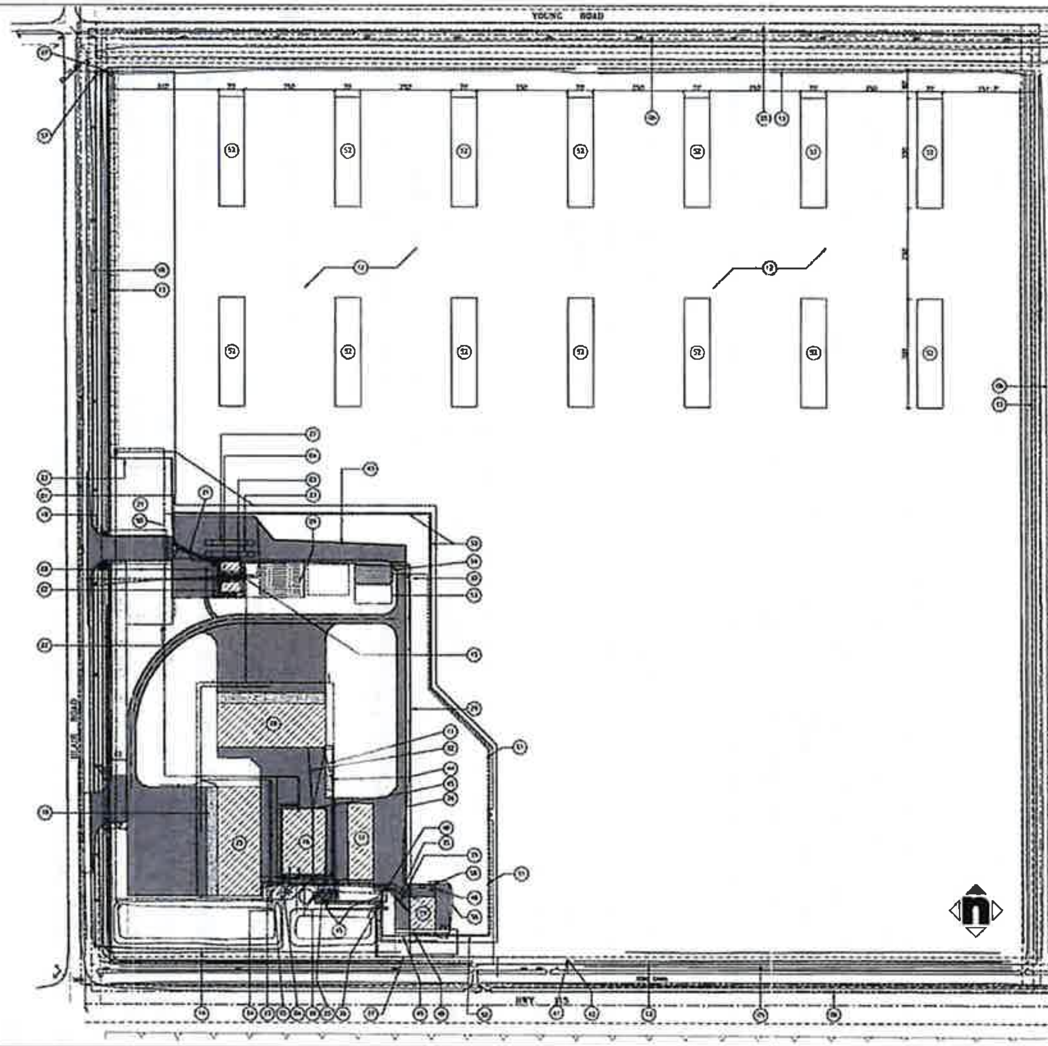


Figure 2
Blair Ranch Site 1 - Site Plan

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Fondomonte grows forage crops in, and purchases forage products from, the northern and southern Imperial Valley (in Imperial County), the Palo Verde Valley (Blythe, next to the eastern border of Southern California with Arizona) and Arizona (Poston and Yuma). The product is stored at both BRS1 and BRS2 until it is ready to be pressed.

BRS1 is completely surrounded by an 8-foot high chain-link fence topped with three-strand barbed wire. The facility has 14 barns used to store raw hay. Each barn is 300 feet long, 70 feet wide and 21 feet tall. The barns are located in the northern half of the parcel and can accommodate storage of 21,000 standard tons of raw product. Adequate room is available for an additional 7 barns or open-air stacks in an approximately 40-acre area in the southeastern corner of the parcel. Approximately 12,000 additional standard tons of raw product can be stored in this area.

In addition to the existing barns and press operation, BRS1 is also developed with administrative facilities in the southwest corner of the parcel. Administrative uses include a 1,458 square foot canteen building and 1,458 office building (**Figure 3**). On-site parking is also available for employees and visitors.

Two points of ingress/egress are available to access BRS1. The main access is a commercial driveway along Blair Road which extends east into the facility leading to the Guard House. Traffic heading north or south along Blair Road can turn right or left into the facility. A second access off Blair Road is located south of the main access and provides a right-hand only turn into site.

Other on-site buildings include the pressed hay building, staging hay building, two (2) finished hay buildings, a shop building and restroom facility.

On-site ancillary facilities include two concrete docks, two (2) 136-foot long by 14-feet wide scales (one in-bound and one out-bound), a 100,000 gallon fire water tank, one (1) 10,000 gallon dual wall diesel gas tank, a 2,000 gallon unleaded gas tank, a 4-inch concrete roll-over berm containment area, a pump and concrete pad, a fill riser, and chaff containment area. No new or expanded buildings or infrastructure is proposed as part of the amended CUP.

Utilities

Utilities at the facility include an IID transformer and a Golden State Water meter. Both dust control water and electricity are provided by IID. Wastewater service is provided by two on-site pressurized septic systems with drainage fields. Electrical, fiber optic, data and phone conduit serve the various buildings and facilities on-site.

Water

BRS1 has two sources of water. Potable water for consumption, pluming, fire suppression and chiller equipment is provided by the Golden State Water Company. Water for dust control is provided by the IID. Fondomonte has an encroachment permit to draw water from the D lateral. Both sources of water are metered by the respective providers.

KEYNOTES

01 EXISTING 12'-0" x 10'-0" GUARD HOUSE (120 SF)
02 EXISTING 26'-8" x 54'-8" CANTEEN BUILDING (1,458 SF)
03 EXISTING 26'-8" x 54'-8" OFFICE BUILDING (1,458 SF)
04 EXISTING EMPLOYEE/PUBLIC PARKING AREA
05 EXISTING LANDSCAPE AREA & ENGINEERED SEPTIC DRAINAGE FIELD SYSTEM BY FUSCOE ENGINEERING
06 EXISTING COMMERCIAL TO RURAL ROAD DRIVEWAY PER COUNTY
07 EXISTING 120'-0" x 180'-0" PRESSED HAY BUILDING
08 EXISTING 70'-0" x 210'-0" STAGING HAY BUILDING
09 EXISTING 70'-0" x 60'-0" SHOP BUILDING
10 EXISTING 100,000 GAL. WATER TANK
11 EXISTING EMPLOYEE PARKING AREA (1 AC.)
12 EXISTING 136'-0" x 14'-0" SCALE
13 EXISTING 120'-0" x 300'-0" FINISHED HAY BUILDING
14 EXISTING 24'-0" WIDE CONCRETE ACCESS ROAD
15 EXISTING 120'-0" x 300'-0" FINISHED HAY BUILDING
16 EXISTING 40'-0" WIDE CONCRETE ACCESS ROAD
17 EXISTING 20'-0" x 40'-0" x 8'-0" HIGH CHAFF CONTAINMENT
18 EXISTING 12'-4"x12'10" RESTROOM FACILITY LEAN-TO EXISTING SHOP BUILDING
19 EXISTING SEPTIC DRAINAGE FIELD SYSTEM
20 EXISTING 2,000 GAL. UNLEADED FUEL TANK

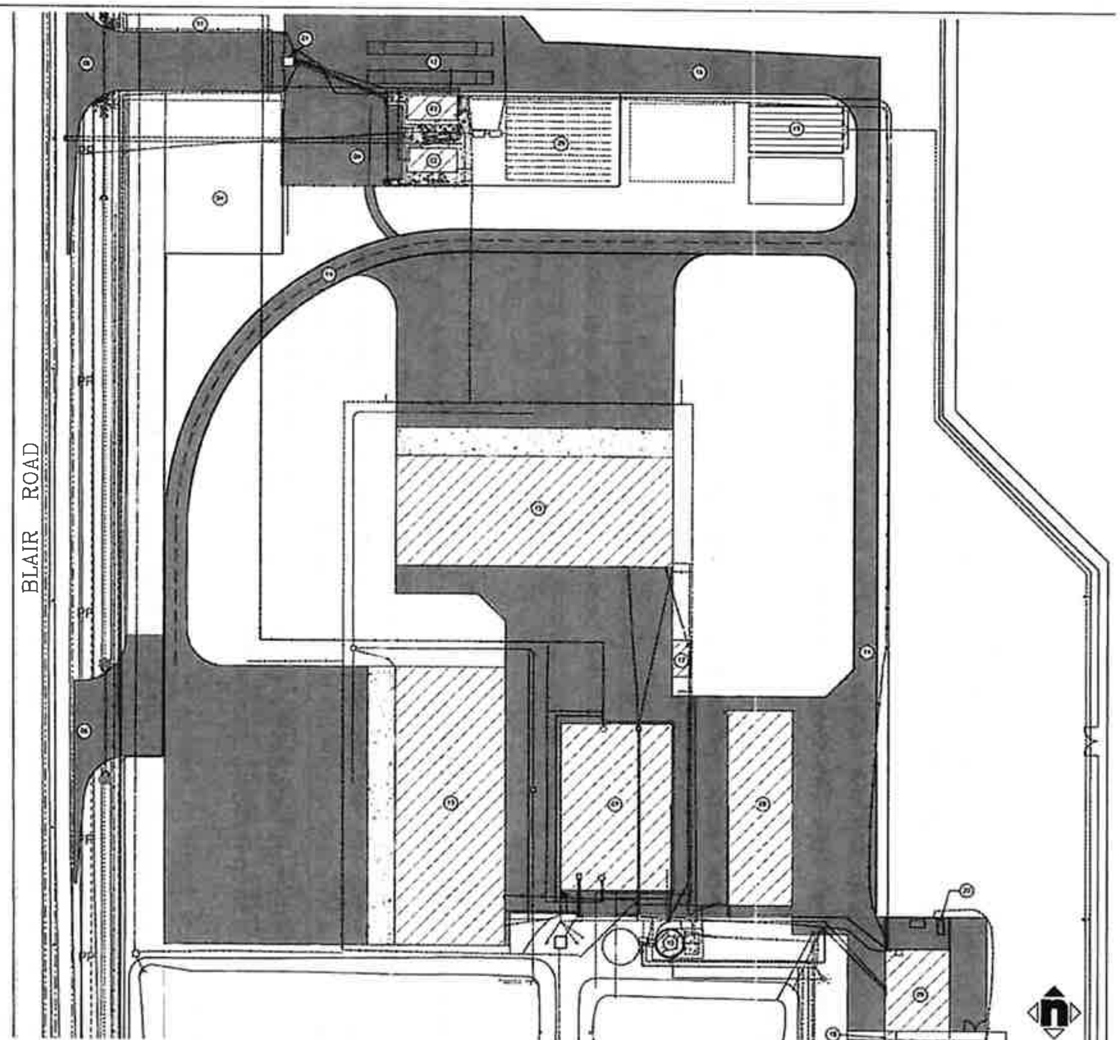


Figure 3
Blair Ranch Site 1 - Facilities Map

Fire Prevention

On-site fire water storage is available in a 100,000-gallon water tank equipped with an Imperial County Fire Department (ICFD)-approved 1,500 gallon per minute electric fire pump and redundant back-up diesel pump. All buildings except for the Guard House and Shop Building are equipped with fire sprinklers with fully automated controls and alarms. All barns are plumbed with sprinklers. BRS1 is served by a complete 6-inch water line loop connected to the fire water supply, including fire hydrants and automated sprinkler systems.

Wastewater

BRS1 has two on-site septic systems to serve the existing buildings. Two septic fields are located to the east of the Canteen and Office Building. Additionally, there are restrooms in the office/canteen at BRS2 for the employees and drivers working at the stack yard.

Electricity

BRS1 is served by the IID for all of its power needs. The site has two existing services of 4,000-amp 3-phase and 400-amp single-phase.

Staffing and Hours of Operation

Under the existing CUP, BRS1 is entitled to employ 49 staff members. Fondomonte is currently employing 96 staff. The existing day shift (4:00 a.m. to 3:00 p.m.) totals 75 to 80 and the night shift totals 16 staff members (3:30 p.m. to 3:00 a.m.). Night shift staff only operate the press and provide security. The office, scale and yard are only staffed during daylight hours 7:00 a.m. to 5:00 p.m. The facility is permitted to operate 24-hours a day, 7 days a week.

Production

Currently, BRS1 is permitted to store 75,000 standard tons of unprocessed forage product. The facility currently operates six days per week, sixteen hours per day but is permitted to operate 24-hours a day, 7 days a week. Fondomonte is proposing amend its CUP to store 110,000 standard tons of unprocessed forage product such as alfalfa, Bermuda Grass and Sudan grass. The amount of daily product processed per day is 1,100 standard tons with a total of 400,000 standard tons processed annually.

Trucking

Raw product and finished hay bales are trucked in and out of BRS1 on a daily basis. Inbound raw product comes from the Imperial Valley, Palo Verde Valley and surrounding areas. Trucks use State Route 115 as well as Blair Road (a County road) (**Figure 4**). Access to BRS1 is provided via a driveway along Blair Road south of Young Road and north of State Route 115. The driveway provides one in-bound and one out-bound lane and is controlled by a stop sign at the westbound approach. Trucks travel along SR 115 then turn north on Blair Road from both the east and west. Truck deliveries generally occur from 6:00 a.m. to 6:00 p.m., Monday thru Saturday.

Upon entering the site, trucks pull the scale to be weighed. The trucks then pull into the yard to be unloaded. All hay from the Fondomonte farm in Blythe is delivered to BRS1. All hay purchased from outside sources is weighed and unloaded at BRS2. Almost all of the trucks are owned and operated by Fondomonte with a few independent sub-haulers. The existing CUP allows for 60

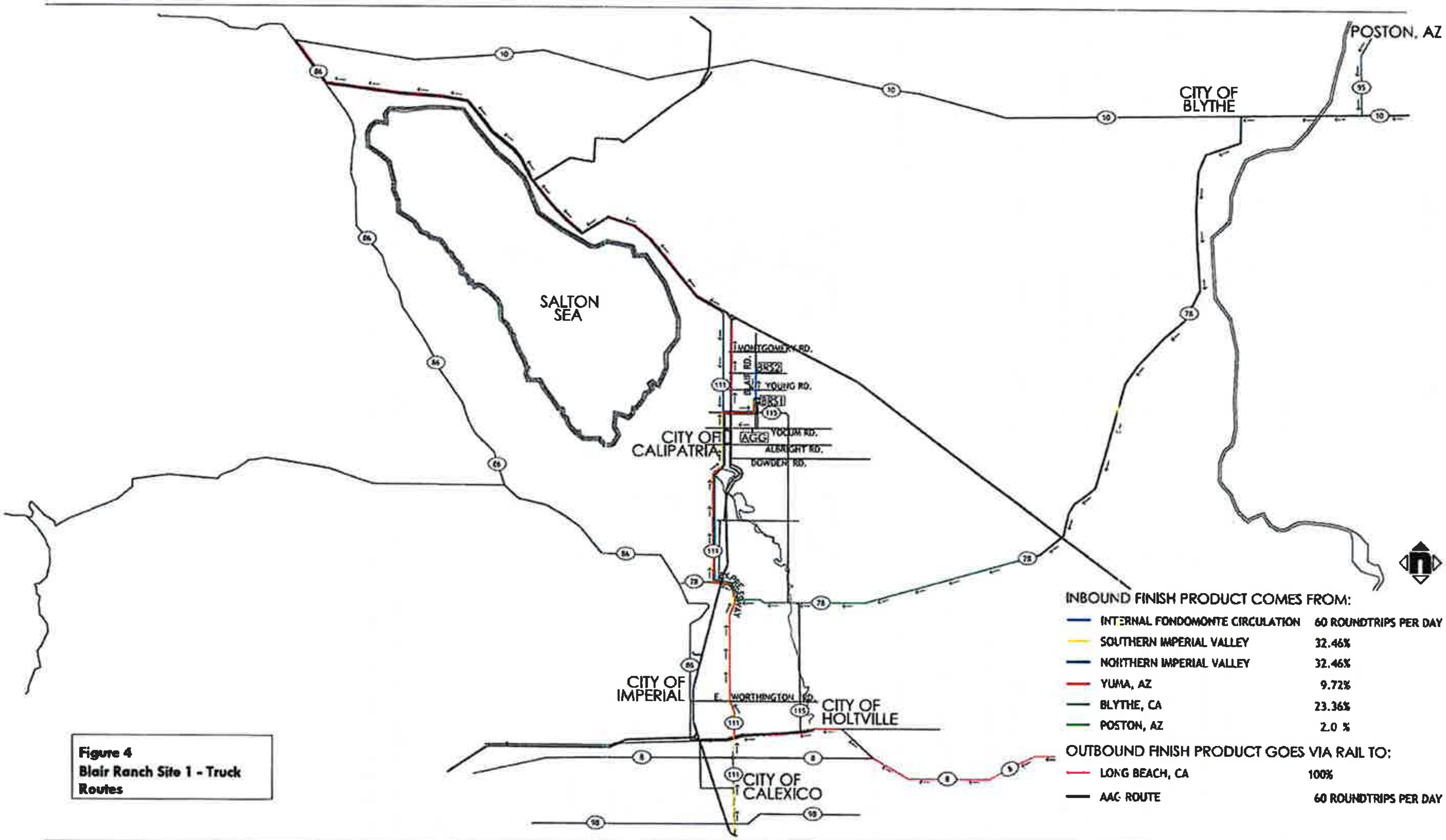


Figure 4
Blair Ranch Site 1 - Truck Routes

inbound trucks. As part of the amended CUP, Fondomonte is proposing 100 inbound trucks per day during the peak season, April 31 through August 31.

Outbound truck routes have been revised from those used as part of the current CUP. Currently, out-bound trucks hauling pressed hay went to the Port of Long Beach for shipment overseas. Beginning in September 2017, transport transitioned from truck to rail. BRS1 shipping has now completely converted to rail to transport out-bound pressed hay to the Port of Long Beach.Pressed hay is trucked approximately 2 miles southwest to the rail spur at the All American Grain (AAG) facility located at 305 Yocum Road, Calipatria. Fondomonte leases the rail spur from AAG. Trucks travel south approximately one-quarter mile on Blair Road to State Route 115, then turn south on Brown Road through the City of Calipatria for one mile to Yocum Road (**Figure 4**). Once on Yocum Road, the trucks travel one-quarter west then turn south into the AAG facility.

BRS1 is currently entitled for 50 out-bound truck trips. Fondomonte is proposing 60 outbound trips per day during the peak season, April 31 through August 31.

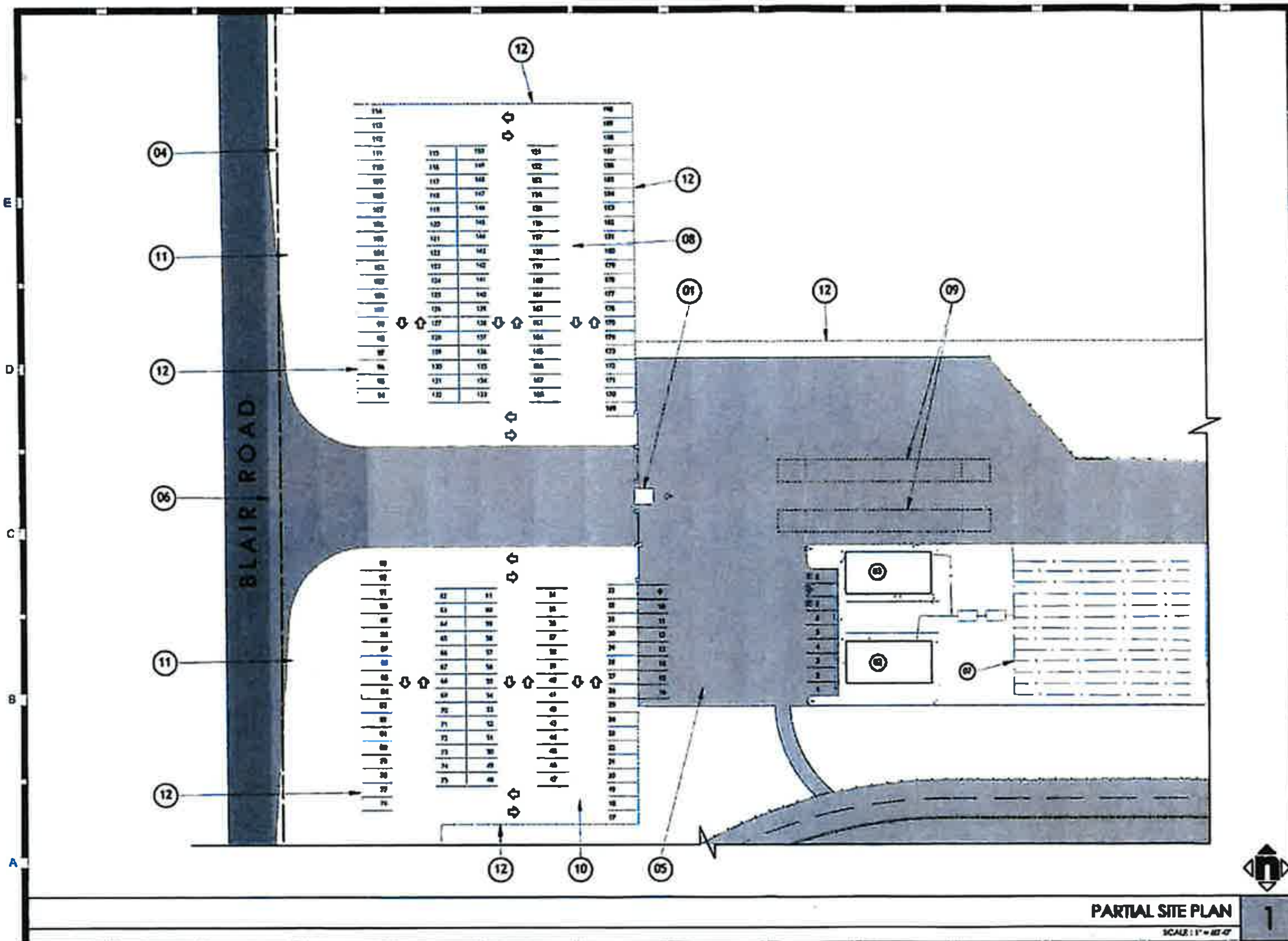
Existing and Proposed Activities

The table below summarizes existing activity compared to what is being proposed in association with the amended CUP.

Activity	Existing CUP Entitlement	Proposed/ Amended CUP	Change
Hay Pressed (tons/day)	1,100 standard tons (st)	1,100 st	0
Presses	2	2	0
Raw Hay Stored on-site	75,000 st	110,000 st	+35,000 st
Annual Raw Hay Processed	400,000 st	400,000 st	0
Double trailer Truck Round-Trips to Site	60	100	+40
Container Truck Trips Out	50	60	+10
Employee Round Trips	49	100	+52
Dust Collector	12,000 cubic feet per minute (cfm)	12,000 cfm	0
Working Hours	24	24	0
Employees	49	100	+51

Permits

BRS1 currently has a Permit to Operate from the Imperial County Air Pollution Control District. No changes to the Permit will be needed in association with the amended CUP.



KEYNOTES

- (01) EXISTING 12'-0" x 10'-0" GUARD HOUSE (120 SF)
- (02) EXISTING 26'-8" x 54'-8" CANTEEN BUILDING (1,458 SF)
- (03) EXISTING 26'-8" x 54'-8" OFFICE BUILDING (1,458 SF)
- (04) ASSUMED PROPERTY LINE
- (05) EXISTING PAVED EMPLOYEE PARKING, 14 STALLS
- (06) EXISTING COMMERCIAL TO RURAL ROAD DRIVEWAY PER COUNTY
- (07) EXISTING RESERVE SEPTIC DRAINAGE FIELD SYSTEM
- (08) EXISTING CLASS 2 BASE EMPLOYEE PARKING, 97 STALLS
- (09) EXISTING TRUCK SCALE
- (10) EXISTING CLASS 2 BASE EMPLOYEE PARKING, 77 STALLS
- (11) EXISTING POWER POLE
- (12) EXISTING FENCE

LOGO

WRA

WATER, RENEWABLES & AGRICULTURE

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ENGINEERS SEAL

PROJECT

FONDOMONTE CALIFORNIA:BLAIR RANCH SITE 1

DRAWING

PARKING AREAS

PROJECT SHEET DATA

JOB NO.
SCALE: AS NOTED
DATE:
DRAWN BY:
CHECKED BY: AM
REVISIONS:

SHEET

A

1 SHEET

PARTIAL SITE PLAN

SCALE: 1" = 40'-0"

EEC ORIGINAL PKG.

ATTACHMENT 1

Air Quality Impact Assessment
(Includes Greenhouse Gases)

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Air Quality Impact Assessment

Fondomonte Blair Ranch Site 1

Imperial County

Prepared for:

Ericsson-Grant, Inc.

5145 Avenida Encinas, Suite H
Carlsbad, CA 92008

Prepared by:

OB-1
AIR ANALYSES

January 2020 (Rev May 2020)

EEC ORIGINAL PKG.

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Acronyms and Abbreviations

μg/m³	micrograms per cubic meter
AAG	All American Grain
AAQS	ambient air quality standard
AB	Assembly Bill
ADAM	CARB's Aerometric Data Analysis and Management System
APS	auxiliary power systems
AQMP	Imperial County Air Quality Management Plan
AQIA	Air Quality Impact Assessment
AR4	IPCC's 4th assessment report
ATC	Authority to Construct
BACM	Best Available Control Measure
BACT	Best Available Control Technology
BAU	business as usual
BRS1	Blair Ranch Site #1
BRS2	Blair Ranch Site #2
CAA	Federal Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards
CalEEMod™	California Emissions Estimator Model
CAPCOA	California Air Pollution Control Officers Association
CAQAR	Comprehensive Air Quality Analysis Report
CARB	California Air Resources Board
CAT	Climate Action Team
CCAA	California Clean Air Act
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFC	chlorofluorocarbon
CH_4	methane
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CTI	California Toxic Inventory
CUP	Conditional Use Permit

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Acronyms and Abbreviations

DPM	diesel particulate matter
EIR	Environmental Impact Report
EMFAC	CARB's emission factors model for on-road mobile sources
EPA	United States Environmental Protection Agency
ESRL	Earth System Research Laboratory
FCAA	Federal Clean Air Act
GHG	greenhouse gas
GWP	global warming potential
HAP	hazardous air pollutant
HDD	heavy-duty diesel
HFC	hydrofluorocarbon
HRA	Health Risk Assessment
ICAPCD	Imperial County Air Pollution Control District
IPCC	International Panel on Climate Change
ITS	Intelligent Transportation Systems
LST	localized significance thresholds
M	million
MEI	Maximum Exposed Individual
$MtCO_2e$	million tonnes of carbon dioxide equivalents
NAAQS	National Ambient Air Quality Standards
NO	nitric oxide
N_2O	nitrous oxide
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NO_X	nitrogen oxides
OFFROAD	CARB's emission factors model for off-road mobile sources
PFC	perfluorocarbon
PM	particulate matter
PM_{10}	respirable particulate matter of 10 micrometers or less in size
$PM_{2.5}$	fine particulate matter of 2.5 micrometers or less in size
ppm	parts per million
RFP	reasonable further progress
ROG	reactive organic gases
SF_6	sulfur hexafluoride
SIP	State Implementation Plan

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Acronyms and Abbreviations

t	abbreviation for tonne (or metric ton)
TAC	toxic air contaminants
tCO_2e	tonne of carbon dioxide equivalents
TIA	Traffic Impact Analysis
TRU	Transportation Refrigeration Unit
UNFCCC	United Nations Framework Convention on Climate Change
VMT	Vehicle miles travelled
VOC	volatile organic compounds
WRI	World Resources Institute

Section 1.0 – INTRODUCTION

1.1. Report Purpose

The purpose of this Air Quality Impact Assessment (AQIA) is to estimate air quality impacts from the amendment of an existing Conditional Use Permit (CUP) for Blair Ranch Site 1, an alfalfa hay storage and pressing facility located near Calipatria in Imperial County, California. This AQIA was conducted within the context of the California Environmental Quality Act (CEQA, California Public Resources Code Sections 21000 *et seq.*). The methodology follows the CEQA Air Quality Handbook[1] prepared by the Imperial County Air Pollution Control District (ICAPCD) for quantification of emissions and evaluation of potential impacts to air resources.

1.2. Project Location

Blair Ranch Site 1 (BRS 1, i.e. the Project) as proposed by Fondomonte California LLC (Fondomonte) is an amendment of its existing CUP (#16-0017) for its hay pressing facility located at 6456 Blair Road, Calipatria in unincorporated Imperial County (APN# 023-030-009). The existing facility operates under the ICAPCD Permit to Operate #4443 Authority to Construct (ATC). The western boundary of the parcel is approximately one-half mile from the eastern city limit of Calipatria. BRS 1 is bordered by Young Road on the north, State Route 115 on the south, County Road 8113 on the east and Blair Road on the west.

1.3. Project Purpose

Fondomonte is amending the existing CUP to address non-compliance issues which include exceeding the permitted quantities of the following:

1. The number of employees working at the facility and the number of employee round trips
2. The amount of raw hay stored on site.
3. The number of truck roundtrips to the site.
4. The number of container truck trips going out of the site.

1.4. Existing Operations

The existing hay press occupies approximately 24 acres of the 160-acre parcel. The remainder of the parcel is devoted to hay storage, administration and ancillary buildings, and infrastructure. A separate hay storage yard known as Blair Ranch Site 2 (BRS 2) is located one mile to the north at 6850 Blair Road. BRS 2 (commonly referred to as the "Stack Yard") has 51 raw product storage barns with a capacity of 76,500 standard tons.

Fondomonte grows forage crops in, and purchases forage products from, the northern and southern Imperial Valley (in Imperial County), the Palo Verde Valley (Blythe, next to the eastern border of Southern California with Arizona) and Arizona (Poston and Yuma). The product is stored at both BRS 1 and BRS 2 until it is ready to be pressed.

BRS 1 has 14 barns used to store raw hay. The barns are in the northern half of the parcel and can accommodate storage of 21,000 standard tons of raw product. Adequate room is available for an additional 7 barns or open-air stacks in an approximately 40-acre area in the southeastern corner of the parcel. Approximately 12,000 additional standard tons of raw product can be stored in this area.

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1 *CEQA Air Quality Handbook: Guidelines for the Implementation of the California Air Quality Act of 1970 as amended.* Imperial County Air Pollution Control District. Final, December 12, 2017.

In addition to the existing barns and press operation, BRS 1 also includes administrative facilities in the southwest corner of the parcel with a 1,458 square foot canteen building and 1,458 SF office building. On-site parking is also available for employees and visitors. Other on-site buildings include the pressed hay building, staging hay building, two (2) finished hay buildings, a shop building and restroom facility.

1.5. Proposed Amendments

Under the existing CUP, BRS 1 is entitled to employ 49 staff members. Currently, the number of employees is 96. The existing day shift (4:00 a.m. to 3:00 p.m.) totals up to 80 employees and the night shift totals 16 staff members (3:30 p.m. to 3:00 a.m.). Night shift staff only operate the press and provide security. The office, scale and yard are only staffed during daylight hours 7:00 a.m. to 5:00 p.m. The facility is permitted to operate 24-hours a day, 7 days a week.

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Raw product and finished hay bales are trucked in and out of BRS 1 daily. Inbound raw product comes from the Imperial Valley, Palo Verde Valley and surrounding areas. All hay from the Fondomonte farm in Blythe is delivered to BRS 1. All hay purchased from outside sources is weighed and unloaded at BRS 2. The existing CUP allows for 60 inbound trucks. As part of the amended CUP, Fondomonte is proposing 100 inbound trucks per day during the peak season, April 31 through August 31.

Outbound truck routes have been revised as compared to the current CUP. In the past, outbound trucks hauling pressed hay went to the Port of Long Beach for shipment overseas. Beginning in September 2017, transport transitioned from truck to rail. BRS 1 shipping has now completely converted to rail to transport out-bound pressed hay to the Port of Long Beach. Pressed hay is trucked approximately 2 miles southwest to the rail spur at the All American Grain (AAG) facility located at 305 Yocum Road, Calipatria. Fondomonte leases the rail spur from AAG. Trucks travel south approximately one-quarter mile on Blair Road to State Route 115, then turn south on Brown Road through the City of Calipatria for one mile to Yocum Road. Once on Yocum Road, the trucks travel one-quarter west then turn south into the AAG facility.

BRS 1 is currently entitled for 50 outbound truck trips. Fondomonte is proposing 60 outbound trips per day during the peak season, April 31 through August 31.

Section 2.0 – EXISTING CONDITIONS

2.1. Climate/Meteorology

Meteorology is the study of weather and climate. Weather refers to the state of the atmosphere at a given time and place regarding temperature, air pressure, humidity, cloudiness, and precipitation. The term "weather" refers to conditions over short periods; conditions over long periods, generally at least 30 to 50 years, are referred to as climate. Climate, in a narrow sense, is usually defined as the "average weather," or more rigorously as the statistical description in terms of the mean and variability of relevant quantities over a period ranging from months to thousands or millions of years. These quantities are most often surface variables such as temperature, precipitation, and wind.

Climatic conditions in Imperial County are governed by the large-scale sinking and warming of air in the semi-permanent tropical high-pressure center of the Pacific Ocean. The high-pressure ridge blocks out most mid-latitude storms except in winter when the high is weakest and farthest south. The coastal mountains prevent the intrusion of any cool, damp air found in California coastal environs. Because of the weakened storms and barrier, Imperial County experiences clear skies, extremely hot summers, mild winters, and little rainfall. The flat terrain of the valley and the strong temperature differentials created by intense solar heating, produce moderate winds and deep thermal convection.

The combination of subsiding air, protective mountains, and distance from the ocean all combine to limit precipitation severely. Rainfall is highly variable with precipitation from a single heavy storm sometimes exceeding the entire annual total during a later drought condition.

Imperial County enjoys a year-round climate characterized by a temperate fall, winter, and spring and a harsh summer. Humidity often combines with the valley's normal high temperatures to produce a moist, tropical atmosphere that frequently seems hotter than the thermometer suggests. The sun shines, on the average, more in the Imperial County that anywhere else in the United States.

2.1.1 Temperature and Precipitation

The nearest National Weather Service Cooperative Observer Program weather station to the Project is the station in Brawley, located approximately 10 miles south-southwest of the Project. At the Brawley[2] station, average recorded rainfall during the Period of Record (1910 to 2007) measured 2.65 inches, with 72 percent of precipitation occurring between October and March and 47 percent in just December, January, and February. Monthly average maximum temperatures at this station vary annually by 38.2 degrees Fahrenheit (°F); 107.6 °F at the hottest to 69.4 °F at the coldest and monthly average minimum temperatures vary by 36.9 °F annually, i.e. from 38.9 °F to 75.8 °F. In fact, this station shows that the months of June, July, August, and September have monthly maximum temperatures greater than 100 °F

2.1.2 Humidity

Humidity in Imperial County is typically low throughout the year, ranging from 28 percent in summer to 52 percent in winter. The large daily oscillation of temperature produces a corresponding large variation in the relative humidity. Nocturnal humidity rises to 50-60 percent but drop to about 10 percent during the day.

2 Western U.S. Climate Historical Summaries. Western Regional Climate Center. http://www.wrcc.dri.edu/Climsum.html. Accessed June 2016.

Summer weather patterns are dominated by intense heat induced low-pressure areas that form over the interior desert.

2.1.3 Wind

The wind direction follows two general patterns. The first pattern occurs seasonally from fall through spring, where prevailing winds are from the west and northwest. Most of these winds originate in the Los Angeles Basins. The Imperial County area occasionally experiences periods of high winds. Wind speeds exceeding 31 mph occur most frequently in April and May. On an annual basis, strong winds, those exceeding 31 mph, are observed 0.6% of the time, where speeds of less than 6.8 mph account for more than one-half of the observed winds. Wind statistics indicate prevailing winds are from the west-northwest through southwest; however, a secondary flow pattern from the southeast is also evident.

2.1.4 Inversions

Air pollutant concentrations are primarily determined by the amount of pollutant emissions in an area and the degree to which these pollutants are dispersed in the atmosphere. The stability of the atmosphere is one of the key factors affecting pollutant dispersion. Atmospheric stability regulates the amount of vertical and horizontal air exchange, or mixing, that can occur within a given air basin. Horizontal mixing is a result of winds, as discussed above, but vertical mixing also affects the degree of stability in the atmosphere. An interruption of vertical mixing is called inversions.

In the atmosphere, air temperatures normally decrease as altitude increases. At varying distances above the earth's surface, however, a reversal of this gradient can occur. This condition, termed an inversion, is simply a warm layer of air above a layer of cooler air, and it has the effect of limiting the vertical dispersion of pollutants. The height of the inversion determines the size of the vertical mixing volume trapped below. Inversion strength or intensity is measured by the thickness of the layer and the difference in temperature between the base and the top of the inversion. The strength of the inversion determines how easily it can be broken by winds or solar heating.

Imperial County experiences surface inversions almost every day of the year. Due to strong surface heating, these inversions are usually broken allowing pollutants to disperse more easily. Weak, surface inversions are caused by radiational cooling of air in contact with the cold surface of the earth at night. In valleys and low-lying areas, this condition is intensified by the addition of cold air flowing down slope from the hills and pooling on the valley floor.

The presence of the Pacific high-pressure cell can cause the air to warm to a temperature higher than the air below. This highly stable atmospheric condition, termed a subsidence inversion can act as a nearly impenetrable lid to the vertical mixing of pollutants. The strength of these inversions makes them difficult to disrupt. Consequently, they can persist for one or more days, causing air stagnation and the buildup of pollutants. Highest or worst-case ozone levels are often associated with the presence of this type of inversion.

2.2. Local Air Quality Conditions

2.2.1 Criteria Air Pollutants

As required by the Federal Clean Air Act (FCAA), the U. S. Environmental Protection Agency (EPA) has identified criteria pollutants and established National Ambient Air Quality Standards (NAAQS) to protect public health and welfare. NAAQS have been established for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide, suspended particulate matter (PM), and lead. Suspended PM has standards for both PM with an aerodynamic diameter of 10 microns or less (respirable PM, or PM_{10}) and PM with an aerodynamic diameter of 2.5 microns or less (fine PM, or $PM_{2.5}$). The California Air Resources Board (CARB) has established separate standards for the State, i.e. the California Ambient Air Quality Standards (CAAQS). CARB established CAAQS for all the federal pollutants and sulfates, hydrogen sulfide, and visibility-reducing particles.

For some of the pollutants, the identified air quality standards are expressed in more than one averaging time in order to address the typical exposures found in the environment. For example, CO is expressed as a one-hour averaging time and an eight-hour averaging time. Regulations have set NAAQS and CAAQS limits in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$). **Table 1** summarizes the State and federal ambient air quality standards for all criteria pollutants.

2.2.1.1 Pollutants of Concern

Ozone

Ozone is not emitted directly to the atmosphere but is formed by photochemical reactions between reactive organic gases (ROG), or volatile organic compounds[3] (VOC), and oxides of nitrogen (NO_X) in the presence of sunlight. The long, hot, humid days of summer are particularly contributing to ozone formation; thus, ozone levels are of concern primarily during the months of May through September.

- Reactive organic gases (ROG) are defined as any compound of carbon, excluding CO, carbon dioxide (CO_2), carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participate in atmospheric photochemical reactions. It should be noted that there are no State or national ambient air quality standard for ROG because ROGs are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions reduces certain chemical reactions that contribute to the formulation of ozone. ROGs are also transformed into organic aerosols in the atmosphere, which contribute to higher PM_{10} and lower visibility.
- Nitrogen oxides (NO_X) serve as integral participants in the process of photochemical smog production. The two major forms of NO_X are nitric oxide (NO) and NO_2. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown irritating gas formed by the combination of NO and oxygen. NO_X is an ozone precursor. A precursor is a directly emitted air contaminant that, when released into the atmosphere, forms, causes to be formed, or contributes to the formation of a secondary air contaminant for which an Ambient Air Quality Standard (AAQS) has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more AAQSs. When NO_X and ROG are released in the atmosphere, they can chemically react with one another in the presence of sunlight to form ozone.

Ozone is a strong chemical oxidant that adversely impacts human health through effects on respiratory function. Ozone can also damage forests and crops. Ozone is not emitted directly by industrial sources or motor vehicles but instead, is formed in atmosphere. Tropospheric[4] ozone is formed by a complex series of chemical reactions involving NO_X, the result of combustion processes and evaporative ROGs such as industrial solvents, toluene, xylene, and hexane as well as the various hydrocarbons that are evaporated from the gasoline used by motor

3 Emissions of organic gases are typically reported only as aggregate organics, either as VOC or as ROG. These terms are meant to reflect what specific compounds have been included or excluded from the aggregate estimate. Although EPA defines VOC to exclude both methane and ethane, and CARB defines ROG to exclude only methane, in practice it is assumed that VOC and ROG are essentially synonymous.

4 The troposphere is the atmospheric layer closest to the Earth's surface. Ozone produced here is an air pollutant that is harmful to breathe, and it damages crops, trees and other vegetation.

vehicles or emitted through the tailpipe following combustion. Additionally, ROGs are emitted by natural sources such as trees and crops. Ozone formation is promoted by strong sunlight, warm temperatures, and winds. High concentrations tend to be a problem in the Imperial County only during the hot summer months when these conditions frequently occur.

Table 1 – National and State Ambient Air Quality Standards[5]

Air Pollutant	Averaging Time	California Standard	National Standard
Ozone (O_3)	1-hour 8-hour	0.09 ppm 0.070 ppm	— 0.070 ppm
Respirable particulate matter (PM_{10})	24-hour Mean	50 µg/m³ 20 µg/m³	150 µg/m³ —
Fine particulate matter ($PM_{2.5}$)	24-hour Mean	— 12 µg/m³	35 µg/m³ 12.0 µg/m³
Carbon monoxide (CO)	1-hour 8-hour	20 ppm 9.0 ppm	35 ppm 9 ppm
Nitrogen dioxide (NO_2)	1-hour Mean	0.18 ppm 0.030 ppm	100 ppb 0.053 ppm
Sulfur dioxide (SO_2)	1-hour 24-hour	0.25 ppm 0.04 ppm	75 ppb —
Lead	30-day Rolling 3-month	1.5 µg/m³ —	— 0.15 µg/m³
Sulfates	24-hour	25 µg/m³	**No Federal Standard**
Hydrogen sulfide	1-hour	0.03 ppm	
Vinyl chloride	24-hour	0.01 ppm	
Visibility-reducing particles	8-hour	Extinction coefficient of 0.23 per kilometer, visibility of ten miles or more due to particles when relative humidity is less than 70%.	

Abbreviations:
ppm = parts per million *ppb = parts per billion* *30-day = 30-day average*
µg/m³ = micrograms per cubic meter *Mean = Annual Arithmetic Mean*

Particulate matter (PM)

PM is a general term used to describe a complex group of airborne solid, liquid, or semi-volatile materials of various size and composition. Primary PM is emitted directly into the atmosphere from both human activities

5 Ambient Air Quality Standards. California Air Quality Board. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf. Accessed November 2019.

(including agricultural operations, industrial processes, construction and demolition activities, and entrainment of road dust into the air) and non-anthropogenic activities (such as windblown dust and ash resulting from forest fires). Secondary PM is formed in the atmosphere from predominantly gaseous combustion by-product precursors, such as sulfur oxides and NO_X, and ROGs. The overwhelming majority of airborne PM in Imperial County is primary PM. The major source of primary PM is fugitive windblown dust, with other contributions from entrained road dust, farming, and construction activities.

Particle size is a critical characteristic of PM that primarily determines the location of PM deposition along the respiratory system (and associated health effects) as well as the degradation of visibility through light scattering. In the United States, federal and state agencies have established two types of PM air quality standards as shown in **Table 1**. PM_{10} corresponds to the fraction of PM no greater than 10 microns in aerodynamic diameter and is commonly called respirable particulate matter, while $PM_{2.5}$ refers to the subset of PM_{10} of aerodynamic diameter smaller than 2.5 microns, which is commonly called fine particulate matter.

PM air pollution has undesirable and detrimental environmental effects. PM affects vegetation, both directly (e.g. deposition of nitrates and sulfates may cause direct foliar damage) and indirectly (e.g. coating of plants upon gravitational settling reduces light absorption). PM also accumulates to form regional haze, which reduces visibility due to scattering of light.

PM_{10} is respirable, with fine and ultrafine particles[6] reaching the alveoli deep in the lungs, and larger particles depositing principally in the nose and throat area. PM_{10} deposition in the lungs results in irritation that triggers a range of inflammation responses, such as mucus secretion and bronchoconstriction, and exacerbates pulmonary dysfunctions, such as asthma, emphysema, and chronic bronchitis. Sufficiently small particles ($PM_{2.5}$ and ultrafines) may penetrate the bloodstream and impact functions such as blood coagulation, cardiac autonomic control, and mobilization of inflammatory cells from the bone marrow. Individuals susceptible to higher health risks from exposure to PM_{10} airborne pollution include children, the elderly, smokers, and people of all ages with low pulmonary/cardiovascular function. For these individuals, adverse health effects of PM_{10} pollution include coughing, wheezing, shortness of breath, phlegm, bronchitis, and aggravation of lung or heart disease, leading for example to increased risks of hospitalization and mortality from asthma attacks and heart attacks.

2.2.1.2 Other Criteria Pollutants

The standards for other criteria pollutants are either being met or are unclassified in the Basin, and the latest pollutant trends suggest that these standards will not be exceeded in the foreseeable future.

2.2.2 Pollutant Transport

As stated above, ozone is a "secondary" pollutant, formed in the atmosphere by reactions between NO_X and ROG. These reactions are driven by sunlight and proceed at varying rates. Transport is the movement of ozone or the pollutants that form ozone from one area (known as the upwind area) to another area (known as the downwind area). Pollutant transport is a very complex phenomenon. Sometimes transport is a straightforward matter of wind blowing from one area to another at ground level, carrying ozone with it, but usually it is not that simple. Transport is three-dimensional; it can take place at the surface, or high above the ground. Meteorologists use the terms "surface" and "aloft" to distinguish these two cases. Often, winds can blow in different directions at different heights above the ground. To complicate matters further, winds can shift during

6 Ultrafine particles are nanoscale, less than 100 nanometers. Regulations do not currently exist for this size class of ambient air pollution particles, which are far smaller than the regulated PM_{10} and $PM_{2.5}$ particle classes and are believed to have several more aggressive health implications than those classes of larger particulates.

the day, pushing a polluted air mass first one way, then another. Finally, because ozone and ozone forming emissions from an upwind area can mix with locally generated ozone and locally generated emissions, it is often difficult to determine the origin of the emission causing high pollution levels. Political boundaries do not prevent transport of pollutants. Transport over distances of several hundred miles has often been documented in California.

The accurate determination of the impacts of transport requires detailed technical analyses in conjunction with modeling studies. The Imperial County 2017 State Implementation Plan for Ozone[7] (2017 Plan) identifies how the transport of emissions and pollutants from Mexico and the coastal areas of Southern California influences ozone violations within Imperial County. Although the Imperial County is currently in attainment of the 1997 8-hour ozone NAAQS, it is important to note that any future analysis of air emissions impacting Imperial County must take into consideration the influence of transport from three distinct sources, that of the South Coast Air Basin via the Coachella Valley to the north, the San Diego Air Basin to the west and the international city of Mexicali, Mexico to the south.

2.2.3 Toxic Air Contaminants

In addition to the above-listed criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. California defines a TAC as an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Assembly Bill (AB) 1807[8] sets forth a procedure for the identification and control of TAC in the State. There are almost 200 compounds that have been designated as TACs in California. The ten TACs posing the greatest known health risk in California, based primarily on ambient air quality data, are acetaldehyde, benzene, 1,3-butadiene, carbon tetrachloride, hexavalent chromium, formaldehyde, methylene chloride, para-dichlorobenzene, perchloroethylene, and diesel particulate matter (DPM).

Since no safe levels of TACs can be determined, there are no ambient standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure.

Since 2004, CARB has maintained the California Toxic Inventory (CTI), which provides emissions estimates by stationary point and aggregated point; areawide; on-road gasoline and on road diesel; off-road mobile gasoline; off-road mobile diesel; and off-road mobile other; and natural sources. Stationary sources include point sources provided by facility operators and/or districts pursuant to the Air Toxics "Hot Spots" Program (AB 2588), and aggregated point sources estimated by CARB and/or districts. Areawide sources are those that do not have specific locations and are spread out over large areas such as consumer products and unpaved roads. Mobile sources consist of on road vehicles such as passenger cars and trucks, motorcycles, busses, and heavy-duty trucks. Off-road sources include trains, ships, and boats. Natural sources like wildfires are also included.

The top three contributors of the potential cancer risk come primarily from motor vehicles - DPM, 1,3 butadiene, and benzene. Cleaner motor vehicles and fuels are reducing the risks from these priority toxic air pollutants. The remaining toxic air pollutants, such as hexavalent chromium and perchloroethylene, while not appearing to contribute as much to the overall risks, can present high risks to people living close to a source. CARB has control measures that are either already on the books, in development, or under evaluation for most

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7 *Imperial County 2017 State Implementation Plan for the 2008 8-hour Ozone Standard.* Imperial County Air Pollution Control District. September 12, 2017.

8 Enacted in September 1983. Health and Safety Code section 39650 et seq., Food and Agriculture Code Section 14021 et seq.

of the remaining top ten, where actions are suitable through our motor vehicle, consumer products, or industrial source programs. Of these top ten, carbon tetrachloride is unique in that most of the health risk from this toxic air pollutant is not attributable to specific sources, but rather to background concentrations. Emissions from the top ten TACs in Imperial County in 2010 are presented in **Table 2.**

Table 2 – 2010 TAC Emissions[9] in Imperial County (tons per year)

Toxic Air Contaminant	SP	AP	A	OD	OG	OMG	OMD	OMO	N	Total
Diesel particulate matter (DPM)	7.608	3.906	0.000	136.542			17.299			165.356
1,3-Butadiene	0.000	0.022	7.835	0.322	6.523	5.025	0.760	1.423	0.137	22.048
Benzene	52.548	2.779	0.134	3.393	31.156	21.806	8.002	1.502		121.319
Acetaldehyde	0.183	0.861	1.203	12.468	4.678	5.933	29.406	3.570	856.92	915.219
Hexavalent Chromium	0.003	0.000	0.000	0.000	0.000	0.000	0.000	0.000		0.004
para-Dichlorobenzene	0.000		5.883							5.883
Formaldehyde	0.795	5.512	1.559	24.952	17.192	18.162	58.851	10.277		137.302
Methylene Chloride	0.096	1.786	7.905							9.787
Perchloroethylene	0.000	11.522	6.697							18.220
Carbon Tetrachloride									>0.001	>0.001

Note: *SP = stationary point*, *AP = aggregated point*, *A = areawide*, *OD = on-road diesel*, *OG = on-road gasoline*, *OMO = off-road mobile diesel*, *OMD = off-road mobile gasoline*, *OMO = off-road mobile other*, *N = natural*

Diesel Particulate matter (DPM)

According to The California Almanac of Emissions and Air Quality 2013 Edition, most of the estimated health risk from TACs can be attributed to relatively few compounds, the most important of which is DPM, which is typically considered a subset of $PM_{2.5}$ because the size of diesel particles are typically 2.5 microns and smaller. Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material. The visible emissions in diesel exhaust are known as particulate matter or PM, which includes carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and over 40 other cancer-causing substances. California's identification of DPM as a toxic air contaminant was based on its potential to cause cancer, premature deaths, and other health problems. Exposure to DPM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources.

2.2.4 Sensitive Receptors

Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These people include children, the elderly, and persons with preexisting respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather are defined as sensitive receptors by ICAPCD.

9 *California Toxics Inventory – Draft 2010 CTI Summary Table*. California Air Resources Board. (November 2013. http://www.arb.ca.gov/toxics/cti/cti.htm. Accessed June 2016.

Residential areas are considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods, resulting in sustained exposure to any pollutants present. Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as most of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public.

The Project is in a remote location with the a few farm residences and one school within two miles. The Calipatria High School (601 West Main, Calipatria) is approximately 2 miles west.

2.3. Greenhouse Gases

Constituent gases that trap heat in the Earth's atmosphere are called greenhouse gases (GHGs), analogous to the way a greenhouse retains heat. GHGs play a critical role in the Earth's radiation budget by trapping infrared radiation emitted from the Earth's surface, which would otherwise have escaped into space. Prominent GHGs contributing to this process include CO_2, methane (CH_4), nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). Without the natural heat-trapping effect of GHG, the earth's surface would be about 34 °F cooler[10]. This is a natural phenomenon, known as the "Greenhouse Effect," is responsible for maintaining a habitable climate. However, anthropogenic emissions of these GHGs in excess of natural ambient concentrations are responsible for the enhancement of the "Greenhouse Effect", and have led to a trend of unnatural warming of the Earth's natural climate known as global warming or climate change, or more accurately Global Climate Disruption. Emissions of these gases that induce global climate disruption are attributable to human activities associated with industrial/manufacturing, utilities, transportation, residential, and agricultural sectors.

The global warming potential (GWP) is the potential of a gas or aerosol to trap heat in the atmosphere. Individual GHG compounds have varying GWP and atmospheric lifetimes. The reference gas for the GWP is CO_2; CO_2 has a GWP of one. The calculation of the CO_2 equivalent (CO_2e) is a consistent methodology for comparing GHG emissions since it normalizes various GHG emissions to a consistent metric. CH_4's warming potential of 25 indicates that CH_4 has a 25 times greater warming affect than CO_2 on a molecular basis. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time period. The time period usually used for GWPs is 100 years. GWPs for the three GHGs produced by the Project are presented in **Table 3.** A CO_2e is the mass emissions of an individual GHG multiplied by its GWP. GHGs are often presented in units called tonnes (t) (i.e. metric tons) of CO_2e (tCO_2e).

Carbon Dioxide (CO_2) is a colorless, odorless gas consisting of molecules made up of two oxygen atoms and one carbon atom. CO_2 is produced when an organic carbon compound (such as wood) or fossilized organic matter, (such as coal, oil, or natural gas) is burned in the presence of oxygen. CO_2 is removed from the atmosphere by CO_2 "sinks", such as absorption by seawater and photosynthesis by ocean-dwelling plankton and land plants, including forests and grasslands. However, seawater is also a source of CO_2 to the atmosphere, along with land plants, animals, and soils, when CO_2 is released during respiration. Whereas the natural production and absorption of CO_2 is achieved through the terrestrial biosphere and the ocean, humankind has altered the natural carbon cycle by burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, each of these activities has increased in

10 *Climate Action Team Report to Governor Schwarzenegger and the California Legislature*. California Environmental Protection Agency, Climate Action Team. March 2006.

scale and distribution. Prior to the industrial revolution, concentrations CO_2 were stable at a range of 275 to 285 ppm[11]. The National Oceanic and Atmospheric Administration (NOAA's) Earth System Research Laboratory (ESRL)[12] indicates that global concentration of CO_2 were 409.09 ppm in October 2019. This concentration of CO_2 exceeds by far the natural range over the last 650,000 years (180 to 300 ppm) as determined from ice cores.

Table 3 – Global Warming Potentials[13]

Pollutant	GWP for 100-year time horizon	
	Second assessment report[14]	4th assessment report (AR4)[15]
Carbon dioxide (CO_2)	1	1
Methane (CH_4)	21	25
Nitrous oxide (N_2O)	310	298

Note: Current protocol is to use the 4th assessment values, however, the second assessment report values are also provided since they are the values used by many inventories and public documents.

Methane (CH_4) is a colorless, odorless non-toxic gas consisting of molecules made up of four hydrogen atoms and one carbon atom. CH_4 is combustible, and it is the main constituent of natural gas-a fossil fuel. CH_4 is released when organic matter decomposes in low oxygen environments. Natural sources include wetlands, swamps and marshes, termites, and oceans. Human sources include the mining of fossil fuels and transportation of natural gas, digestive processes in ruminant animals such as cattle, rice paddies and the buried waste in landfills. Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH_4. Other anthropogenic sources include fossil-fuel combustion and biomass burning.

Nitrous Oxide (N_2O) is a colorless, non-flammable gas with a sweetish odor, commonly known as "laughing gas", and sometimes used as an anesthetic. N_2O is naturally produced in the oceans and in rainforests. Man-made sources of N_2O include the use of fertilizers in agriculture, nylon and nitric acid production, cars with catalytic converters and the burning of organic matter. Concentrations of N_2O also began to rise at the beginning of the industrial revolution.

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11 *Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change, 2007.* Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.). Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

12 *Trends in Atmospheric Carbon Dioxide. Earth System Research Laboratory.* National Oceanic and Atmospheric Administration. http://www.esrl.noaa.gov/gmd/ccgg/trends/global.html. Accessed January 2020.

13 *Global Warming Potentials. Greenhouse Gas Protocol.* World Resources Institute and World Business Council on Sustainable Development. http://www.ghgprotocol.org/files/ghgp/tools/Global-Warming-Potential-Values.pdf. Accessed May 2015.

14 *Second Assessment Report. Climate Change 1995: WG I - The Science of Climate Change.* Intergovernmental Panel on Climate Change. 1996

15 *Climate Change 2007: The Physical Science Basis.* Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. 2007

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically un-reactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source but were first synthesized in 1928. It was used for refrigerants, aerosol propellants, and cleaning solvents. Because of the discovery that they can destroy stratospheric ozone, an ongoing global effort to halt their production was undertaken and has been extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years. The Project is not expected to emit any CFCs.

Hydrofluorocarbons (HFCs) are synthesized chemicals that are used as a substitute for CFCs. Out of all the GHGs, HFCs are one of three groups with the highest GWP. HFCs are synthesized for applications such as automobile air conditioners and refrigerants. The Project is not expected to emit any HFCs.

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface can destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. The two main sources of PFCs are primary aluminum production and semiconductor manufacture. The Project is not expected to emit any PFCs.

Sulfur Hexafluoride (SF_6) is an extremely potent greenhouse gas. SF_6 is very persistent, with an atmospheric lifetime of more than a thousand years. Thus, a relatively small amount of SF_6 can have a significant long-term impact on global climate change. SF_6 is human-made, and the primary user of SF_6 is the electric power industry. Because of its inertness and dielectric properties, it is the industry's preferred gas for electrical insulation, current interruption, and arc quenching (to prevent fires) in the transmission and distribution of electricity. SF_6 is used extensively in high voltage circuit breakers and switchgear, and in the magnesium metal casting industry. The Project is not expected to emit SF_6.

2.3.1 GHG Emission Levels

Per the World Resources Institute[16] (WRI) in 2014, total worldwide GHG emissions were estimated to be 44,204 million (M) t of CO_2e ($MtCO_2e$) and GHG emissions per capita worldwide was 6.13 tCO_2e. These emissions exclude GHG emissions associated with the land use, land-use change, and forestry sector, and bunker fuels. The WRI reports that in 2014, total GHG emissions in the U.S. were 6,371 $MtCO_2e$, with average GHG emissions per capita of 20.00 tCO_2e and total GHG emissions in California were 454.5 $MtCO_2e$ in 2014, with average GHG emissions per capita of 11.75 tCO_2e.

California has a larger percentage of its total GHG emissions coming from the transportation sector (56%) than the U.S. emissions (31%) and a smaller percentage of its total GHG emissions from the electricity generation sector, i.e. California has 13 percent, but the U.S. has 43 percent.

2.3.2 Potential Environmental Effects

Worldwide, average temperatures are likely to increase by 3 °F to 7 °F by the end of the 21st century[17]. However, a global temperature increase does not directly translate to a uniform increase in temperature in all locations on the earth. Regional climate changes are dependent on multiple variables, such as topography. One

16 CAIT Climate Data Explorer. Historical Emissions. World Resources Institute. http:// http://cait2.wri.org/historical/. Accessed May 2019.

17 *Climate Change 2007: Impacts, Adaptation, and Vulnerability.* Website http://www.ipcc.ch/ipccreports/ar4-wg2.htm. Accessed March 2013.

region of the Earth may experience increased temperature, increased incidents of drought, and similar warming effects, whereas another region may experience a relative cooling. According to the International Panel on Climate Change's (IPCC's) Working Group II Report[18], climate change impacts to North America may include diminishing snowpack, increasing evaporation, exacerbated shoreline erosion, exacerbated inundation from sea level rising, increased risk and frequency of wildfire, increased risk of insect outbreaks, increased experiences of heat waves, and rearrangement of ecosystems, as species and ecosystem zones shift northward and to higher elevations.

2.3.3 California Implications

Even though climate change is a global problem and GHGs are global pollutants, the specific potential effects of climate change on California have been studied. The third assessment produced by the California Natural Resources Agency (CNRA)[19] explores local and statewide vulnerabilities to climate change, highlighting opportunities for taking concrete actions to reduce climate-change impacts. Projected changes for the remainder of this century in California include:

- **Temperatures** – By 2050, California is projected to warm by approximately 2.7 °F above 2000 averages, a threefold increase in the rate of warming over the last century and springtime warming — a critical influence on snowmelt — will be particularly pronounced.
- **Rainfall** – Even though model projections continue to show the Mediterranean pattern of wet winters and dry summers with seasonal, year-to-year, and decade-to-decade variability, improved climate models shift towards drier conditions by the mid-to-late 21st century in Central, and most notably, Southern California.
- **Wildfire** - Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning, with human activities continuing to be the biggest factor in ignition risk. Models are showing that estimated property damage from wildfire risk could be as much as 35 percent lower if smart growth policies were adopted and followed than if there is no change in growth policies and patterns.

The third assessment by CNRA not only defines projected vulnerabilities to climatic changes but analyzes potential impacts from adaptation measures used to minimize harm and take advantage of beneficial opportunities that may arise from climate change.

The report highlights important new insights and data, using probabilistic and detailed climate projections and refined topographic, demographic, and land use information. The findings include:

- The State's electricity system is more vulnerable than was previously understood.
- The Sacramento-San Joaquin Delta is sinking, putting levees at growing risk.
- Wind and waves, in addition to faster rising seas, will worsen coastal flooding.
- Animals and plants need connected "migration corridors" to allow them to move to habitats that are more suitable to avoid serious impacts.
- Native freshwater fish are particularly threatened by climate change.
- Minority and low-income communities face the greatest risks from climate change.

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18 ibid

19 *Our Changing Climate 2012: Vulnerability & Adaptation to the Increasing Risks from Climate Change in California.* California Natural Resources Agency. July 2012 / CEC-500-2012-007

2.4. Baseline Conditions

2.4.1 Local Ambient Air Quality

Existing levels of ambient air concentrations and historical trends and projections in the project area are best documented by measurements made by the ICAPCD and CARB. Imperial County began its ambient air monitoring in 1976; however, monitoring of ozone began in 1986 at the El Centro monitoring station. Since that time, monitoring has been performed by the ICAPCD, CARB, and private industry. There are six monitoring sites in Imperial County from Niland to Calexico.

The nearest monitoring station to the Project site is in Niland, approximately 7 miles north-northwest. In Niland, there is a station called Niland-English Road that is located at 7711 English Road. The Niland station monitors ozone and PM_{10}. **Table 4** summarizes 2013 through 2018 published monitoring data from the CARB's Aerometric Data Analysis and Management System (ADAM).

The monitoring data shows that the Niland station exceeded the State PM_{10} standard in all six years except 2017 but only exceeded the federal PM_{10} standard once in the six years. The station exceeded the State 8-hour ozone standard in all six years but only exceeded the federal 8-hour ozone in four of the six years. The State 1-hour ozone standard was only exceeded in 2013.

Table 4 – Ambient Air Quality Monitoring Summary for Niland-English Road Station[20]

Air Pollutant/Ambient Air Quality Standard	Monitoring Year					
Ozone	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**
Max 1 Hour (ppm)	0.102	0.081	0.091	0.079	0.072	0.060
Days > CAAQS (0.09 ppm)	1	0	0	0	0	0
Max 8 Hour (ppm)	0.083	0.075	0.074	0.066	0.061	0.055
Days > NAAQS (0.075 ppm)	3	0	0	0	0	0
Days > CAAQS (0.070 ppm)	5	2	5	0	0	0
Inhalable Particulate Matter (PM_{10})	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**
Max Daily California Measurement	333.1	275.9	259.8	225.7	345.8	331.5
Days > NAAQS (150 μg/m³)	0	1	1	1	4	11
Days > CAAQS (50 μg/m³)	145	190	17	14	N/A	7

Abbreviations:
> = exceeding
Bold = exceedance
N/A = not available
ppm = parts per million
ppb = parts per billion
μg/m³ = micrograms per cubic meter
CAAQS = California Ambient Air Quality Standard
NAAQS = National Ambient Air Quality Standard

20 ADAM Air Quality Data Statistics. California Air Resources Board. http://www.arb.ca.gov/adam/welcome.html. Accessed November 2019.

Section 3.0 – REGULATORY CONTEXT

Air pollutants are regulated at the national, State, and air basin level; each agency has a different degree of control. EPA regulates at the national level; CARB regulates at the State level; and ICAPCD regulates at the air basin level in the Project area.

3.1. Regulatory Agencies

3.1.1 Environmental Protection Agency (EPA)

EPA is the federal agency responsible for overseeing state air programs as they relate to the FCAA, approving State Implementation Plans (SIPs), establishing NAAQS and setting emission standards for mobile sources under federal jurisdiction. EPA also regulates Hazardous Air Pollutants (HAPs) under the FCAA. EPA has delegated the authority to implement many of the federal programs to the states while retaining an oversight role to ensure that the programs continue to be implemented.

3.1.2 California Air Resources Board (CARB)

CARB is the State agency responsible for establishing CAAQS, adopting and enforcing emission standards for various sources including mobile sources (except where federal law preempts their authority), fuels, consumer products, and toxic air contaminants. CARB is also responsible for providing technical support to California's 35 local air districts, which are organized at the county or regional level, overseeing local air district compliance with State and federal law, approving local air plans and submitting the SIP to the EPA. CARB also regulates mobile emission sources in California, such as construction equipment, trucks, and automobiles. CARB also maintains a comprehensive air toxics program.

For the purposes of managing air quality in California, the California Health & Safety Codes Section 39606(a)(2) gave CARB the responsibility to, "based upon similar meteorological and geographic conditions and consideration for political boundary lines whenever practicable, divide the State into air basins to fulfill the purposes of this division". Imperial County is located within the Salton Sea Air Basin.

3.1.3 Imperial County Air Pollution Control District (ICAPCD)

The ICAPCD shares responsibility with CARB for ensuring that all State and federal ambient air quality standards are achieved and maintained within the County. State law assigns to local air pollution control districts the primary responsibility for control of air pollution from stationary sources, while reserving an oversight role for CARB. Generally, the air pollution control districts must meet minimum State and EPA program requirements. The air pollution control district is also responsible for the inspection of stationary sources, monitoring of ambient air quality, and planning activities such as modeling and maintenance of the emission inventory. Air pollution control districts in State nonattainment areas are also responsible for developing and implementing transportation control measures necessary to achieve the state ambient air quality. Regarding the SIP, air pollution control districts will implement the following activities:

1. Development of emission inventories, modeling process, trend analysis and quantification and comparison of emission reduction strategies.
2. Necessary information on all federal and State adopted emission reduction measures which affect the area.
3. Review of emissions inventory, modeling, and self-evaluation work.
4. Technical and strategic assistance, as appropriate, in the selection and implementation of emission reduction strategies.

5. Technical and planning assistance in developing and implementing processes to address the impact of emissions growth beyond the attainment date.
6. Maintenance of monitors and reporting and analysis of monitoring data.
7. Support for public education efforts by providing information to the community for means of outreach.
8. Coordinate communication between local areas and EPA to facilitate continuing EPA review of local work.
9. Expeditious review of the locally developed plan, and if deemed adequate, propose modification of the Air Quality Management Plan (AQMP) to adopt the early progress plan.
10. Adoption of emission reduction strategies into the AQMP as expeditiously as possible.

3.2. Attainment Status

3.2.1 Designations/Classifications

EPA has identified nonattainment and attainment areas for each NAAQS. Under amendments to the FCAA, EPA has designated air basins or portions thereof as attainment, nonattainment, or unclassifiable, based on whether the national standards have been achieved. The State designates air basins or portions thereof for all CAAQS. The State designation criteria specify four categories: nonattainment, nonattainment-transitional, attainment, and unclassified.

In addition, the FCAA uses a classification system to design clean-up requirements appropriate for the severity of the pollution and set realistic deadlines for reaching clean-up goals. If an air basin is not in federal attainment for a pollutant, the Basin is classified as a marginal, moderate, serious, severe, or extreme nonattainment area, based on the estimated time it would take to reach attainment. Nonattainment areas must take steps towards attainment by a specific timeline. Table 5 shows the federal and State attainment designations and federal classifications for the Basin.

3.2.2 Federal Clean Air Act Requirements

The FCAA requires plans to provide for the implementation of all reasonably available control measures including the adoption of reasonably available control technology for reducing emissions from existing sources. The FCAA encourages market-based approaches to emission control innovations.

On April 30, 2004, Imperial County was classified as a "marginal" nonattainment area for 8-Hour Ozone NAAQS under the FCAA. On March 13, 2008, the EPA found that Imperial County failed to meet attainment for the 8-Hour Ozone NAAQS by June 15, 2007 and was reclassified as "moderate" nonattainment. However, on November 17, 2009, EPA announced that Imperial County has met the 1997 federal 8-hour ozone standard—demonstrating improved air quality in the area. The announcement is based on three years of certified clean air monitoring data for the years 2006-2008. **Table 5** shows the designations and classifications for the Basin.

In response to the opinion of the US Court of Appeals for the Ninth Circuit in *Sierra Club v. United States Environmental Protection Agency, et al.*, in August 2004 the EPA found that the Imperial Valley PM_{10} nonattainment area had failed to attain by the moderate area attainment date of December 31, 1994, and as a result reclassified under the FCAA the Imperial Valley from a moderate to a serious PM_{10} nonattainment area. Also, in August 2004, the EPA proposed a rule to find that the Imperial area had failed to attain the annual and 24-hour PM_{10} standards by the serious area deadline of December 31, 2001. The EPA finalized the rule on December 11, 2007, citing as the basis for the rule that six Imperial County monitoring stations were in violation of the 24-hour standard during 1999-2001. The EPA's final rule action requires the State to submit to the EPA by December 11, 2008 (within one year of the rule's publication in the Federal Register) an air quality plan that demonstrates that the County will attain the PM_{10} standard as expeditiously as practicable.

Table 5 – Designations/Classifications for the Basin[21]

Pollutant	State Designation	Federal Designation (Classification)
Ozone	Nonattainment	Nonattainment (Marginal)
Respirable PM (PM_{10})	Nonattainment	Nonattainment (Serious) *
Fine PM ($PM_{2.5}$)	Attainment***	Attainment **
Carbon Monoxide (CO)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Unclassifiable/Attainment
Sulfates	Attainment	No Federal Standard
Hydrogen Sulfide	Unclassified	
Visibility reducing Particles	Unclassified	

* Designation for Imperial Valley Planning Area only, which is most of Imperial County save for a small stretch of land on the County's eastern end.

** A Determination of Attainment for the 2006 24-hour $PM_{2.5}$ standard was made by EPA in June 2017.

*** Designation for the whole of Imperial County except the Calexico area.

On November 13, 2009, EPA published Air Quality Designations for the 2006 24-Hour Fine Particle ($PM_{2.5}$) National Ambient Air Quality Standards[22] wherein Imperial County was listed as designated nonattainment for the 2006 24-hour $PM_{2.5}$ NAAQS. On April 10, 2014, CARB Board gave final approval to the 2013 Amendments to Area Designations for CAAQSs. For the State $PM_{2.5}$ standard, effective July 1, 2014, the Calexico area was designated nonattainment, while the rest of the SSAB was designated attainment. The Project lies outside the Calexico nonattainment area.

3.3. Regulatory Framework

This section contains a discussion of the federal, State, and local air quality regulations, plans, and policies applicable to the Project. Federal, State, and local authorities have adopted rules and regulations that govern the emissions of air pollutants from any facility. The local and federal authorities each have specific criteria for the evaluation of a source and its emissions and the authority to issue permit conditions and specify recordkeeping and reporting requirements that must be met in order to operate a source of air pollutants.

3.3.1 Federal Regulations and Standards

The FCAA was enacted in 1970 and last amended in 1990 (42 USC 7401, et seq.) with the purpose of controlling air pollution and providing a framework for national, state, and local air pollution control efforts. Basic components of the FCAA and its amendments include NAAQS for major air pollutants, hazardous air pollutants standards, SIP requirements, motor vehicle emissions standards, and enforcement provisions. The

21 Area Designations and Maps – 2018. California Air Resources Board. December 31, 2018.

22 Air Quality Designations for the 2006 24-Hour Fine Particle ($PM_{2.5}$) National Ambient Air Quality Standards. United States Environmental Protection Agency. Federal Register. Vol. 74, No. 218. November 13, 2009.

FCAA was enacted for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity.

3.3.2 State Regulations and Standards

CARB is responsible for responding to the FCAA, regulating emissions from motor vehicles and consumer products, and implementing the California Clean Air Act (CCAA). The CCAA outlines a program to attain the CAAQSs for ozone, sulfur dioxide, and CO by the earliest practical date. Since CAAQSs are more stringent than NAAQSs in most cases, attainment of the CAAQS will require more emissions reductions than what would be required to show attainment of the NAAQS. Like the federal system, the state requirements and compliance dates are based upon the severity of the ambient air quality standard violation within a region.

3.3.3 Local Regulations and Standards

The ICAPCD also has the authority to adopt and enforce regulations dealing with controls for specific types of sources, emissions of hazardous air pollutants, and New Source Review. The ICAPCD Rules and Regulations are part of the SIP and are separately enforceable by the EPA. The following ICAPCD rules potentially apply to the Project:

- **Rules 800** (General Requirements for Control of Fine Particulate Matter), **801** (Construction and Earthmoving Activities), **802** (Bulk Materials, **803** (Carry-out and Track-out), **804** (Open Areas), and **805** (Paved and Unpaved Roads) are intended to reduce the amount of PM_{10} entrained in the ambient air as a result of emissions generated by anthropogenic fugitive dust sources by requiring actions to prevent, reduce, or mitigate PM_{10} emissions. These rules include opacity limits, control measure requirements, and dust control plan requirements that apply to activities at the Facility.

3.3.4 Air Quality Management Plans (AQMP)

3.3.4.1 Ozone Plan

On December 3, 2009, the EPA issued a final ruling determining that the Imperial County "moderate" 8-hour ozone non-attainment area attained the 1997 8-hour NAAQS for ozone. The determination by EPA was based upon complete, quality-assured, and certified ambient air monitoring data for the years 2006 thru 2008. This determination effectively suspended the requirement for the state to submit an attainment demonstration, a Reasonable Further Progress (RFP) plan, contingency measures and other planning requirements for so long as Imperial County continues to attain the 1997 8-hour ozone NAAQS. However, this determination did not constitute a re-designation to attainment; therefore, the classification and designation status for Imperial County remain as a "moderate" non-attainment area of the 1997 8-hour ozone NAAQS. As such, Imperial County was required to submit for EPA approval a 2009 8-Hour Ozone "Modified" Air Quality Management Plan (Modified AQMP), which was approved July 13, 2010.

The Modified AQMP serves as a comprehensive planning document intended to provide guidance to the ICAPCD, the County, and other local agencies on how to continue maintaining the 1997 8-hour ozone NAAQS. The Modified AQMP includes control measures consisting of three components: 1) the ICAPCD's Stationary Source Control Measures; 2) Regional Transportation Control Measures; and 3) the State Strategy. These measures primarily rely on the traditional command and control approach and as such provide the framework for ICAPCD rules that reduce ROG and NO_X emissions.

The current designation for the PM_{10} standard remains nonattainment as of February 28, 2019.[23] The ICAPCD is in the process of requesting an attainment redesignation and maintenance plan.[24] However, Imperial County's 2017 Ozone SIP[25], demonstrates that Imperial County is in attainment of the 2008 8-hour ozone standard but for emissions emanating across the international border. In addition, a weight-of-evidence analysis has been included to show that Imperial County will maintain this status of attainment through the July 2018 attainment date.

As of November 2017, after consideration of CARB's recommendations, the EPA "is designating Imperial County, CA as nonattainment for the 2015 ozone NAAQS".[26]

3.3.4.2 PM_{10} Plan

The ICAPCD District Board of Directors adopted the PM_{10} SIP for Imperial County on August 11, 2009[27]. The PM_{10} SIP meets EPA requirements to demonstrate that the County will attain the PM_{10} standard as expeditiously as practicable. The PM_{10} SIP was required to address and meet the following elements, required under the FCAA of areas classified to be in serious nonattainment of the NAAQS:

- Best available emission inventories.
- A plan that enables attainment of the PM_{10} federal air quality standards.
- Annual reductions in PM_{10} or PM_{10} precursor emissions that are of not less than 5 percent from the date of SIP submission until attainment.
- Best available control measures and best available control technologies for significant sources and major stationary sources of PM_{10}, to be implemented no later than 4 years after reclassification of the area as serious.
- Transportation conformity and motor vehicle emission budgets in accord with the attainment plan.
- Reasonable further progress and quantitative milestones; and
- Contingency measures to be implemented (without the need for additional rulemaking actions) if the control measure regulations incorporated in the plan cannot be successfully implemented or fail to give the expected emission reductions.

The PM_{10} SIP updated the emission inventory to incorporate revised cattle emissions, revised windblown dust model results, revised South Coast Association of Governments activity data, and updated entrained and windblown unpaved road dust estimates. The adjustments made to the emission inventory fell in two categories: (i) adjustments to incorporate new methodology and updated information (e.g., throughputs, activity data, etc.), and (ii) adjustments to incorporate emission reductions arising from the implementation of new control measures.

Additionally, the PM_{10} SIP demonstrates that Imperial County attained the Federal PM_{10} NAAQS, but-for international emissions from Mexico, based on 2006-2008 monitoring data. Attainment was due, in part, to

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23 *Green Book PM-10 (1987) Area Information*. United States Environmental Protection Agency. https://www.epa.gov/green-book/green-book-pm-10-1987-area-information. Accessed March 2019.

24 *Draft Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter*. Imperial County Air Pollution Control District. September 2018.

25 *2017 Imperial County State Implementation Plan for the 2008 8-Hour Ozone Standard*. Imperial County Air Pollution Control District, September 12, 2017.

26 *California - Final Area Designations for the 2015 Ozone National Ambient Air Quality Standards, Technical Support Document*. United States Environmental Protection Agency. November 16, 2017.

27 *2009 Imperial County State Implementation Plan for Particulate Matter Less Than 10 Microns in Aerodynamic Diameter*. Imperial County Air Pollution Control District. July 10, 2009.

ICAPCD's November 2005 adoption and subsequent implementation of Regulation VIII fugitive dust rules; those rules were based on the related 2005 Best Available Control Measure analysis.

Since the reclassification of Imperial County to serious nonattainment for PM_{10} occurred on August 2004 and control of fugitive PM_{10} emissions from the significant source categories that meets best available control measure (BACM) stringency identified in the PM_{10} SIP began in January 2006.

Major stationary sources are required to implement Best Available Control Technology to control PM_{10} emissions (Rule 207) and they are required to comply with the 20 percent opacity (Rule 403). In addition, stationary sources will be required to mitigate fugitive dust emissions from access roads, construction activities, handling and transferring of bulk materials, and track-out/carry-out according to the requirements of Regulation VIII.

Because the Imperial County is shown in the PM_{10} SIP to have attained the 24-hour PM_{10} NAAQS but-for international transport of Mexicali emissions in 2006-2008, reasonable further progress and milestone requirements are unnecessary, and specifically the 5 percent yearly emission reductions requirement does not apply to future years. As documented in the PM_{10} SIP, all remaining SIP requirements applicable to the 2009 Imperial County PM_{10} Plan have been successfully addressed.

3.3.4.3 $PM_{2.5}$ Plan

The ICAPCD District Board of Directors adopted the $PM_{2.5}$ SIP for Imperial County on December 2, 2014 [28]. The $PM_{2.5}$ SIP fulfills the requirements of the Clean Air Act Amendments (CAA) for those areas classified as "moderate" nonattainment for $PM_{2.5}$. The $PM_{2.5}$ SIP incorporates updated emission inventories, and analysis of Reasonable Available Control Measures, an assessment of reasonable further progress (RFP), and a discussion of contingency measures. Analyses in the $PM_{2.5}$ SIP included assessing emission inventories from Imperial County and Mexicali; evaluating the composition and elemental makeup of samples collected on Calexico violation days; reviewing the meteorology associated with high concentration measurements; and performing directional analysis of the sources potentially impacting the Calexico $PM_{2.5}$ monitor. As is demonstrated in the $PM_{2.5}$ SIP, the primary reason for elevated $PM_{2.5}$ levels in Imperial County is transport from Mexico. Essentially, the $PM_{2.5}$ SIP demonstrated attainment of the 2006 $PM_{2.5}$ NAAQS "but-for" transport of international emissions from Mexicali, Mexico.

3.4. Toxic Air Contaminants (TACs)/Hazardous Air Pollutants (HAPs)

3.4.1 Federal Toxics Legislation

Another group of substances found in ambient air are referred to as HAPs under the FCAA and TACs under the CCAA. HAPs are the air contaminants identified by the EPA as known or suspected to cause cancer, serious illness, birth defects, or death. These contaminants tend to be localized to their sources and are found in relatively low concentrations in ambient air.

3.4.2 State Toxics Legislation

The CARB Statewide comprehensive air toxics program was established in the early 1980s. In 1983, the TAC Identification and Control Act (AB 1807) created California's program to reduce exposure to air toxics and in 1987, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) supplements the AB 1807

[28] *Imperial County 2013 SIP for the 2006 24-hr PM2.5 Moderate Nonattainment Area.* Imperial County Air Pollution Control District. December 2, 2014.

program by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled engines and vehicles. The goal of the Plan is to reduce PM emissions and the associated health risks by 75 percent by 2010 and 85 percent by 2020. The Plan provides a roadmap that identifies steps CARB has and will be taking to develop specific regulations to reduce DPM emissions, including:

3.4.2.1 On-Road Diesel Truck Fleets

California Code of Regulations (CCR) Title 14, Section 2025 is the codified regulation that limits NO_X, PM_{10}, and $PM_{2.5}$ emissions from on-road diesel truck fleets that operate in California. By January 1, 2017, 80 percent of a truck fleet is required to have installed Best Available Control Technology (BACT) for NOx emissions and 100 percent of a truck fleet installed BACT for PM_{10} emissions. All diesel trucks that utilize public roads in California are required to comply with CCR Title 13, Section 2025.

3.4.2.2 Commercial Vehicle Idling and Auxiliary Power Systems

CCR Title 13, Section 2485 is the codified regulation that regulates idling activities and auxiliary power systems (APS) in commercial vehicle vehicles with a vehicle weight rating of greater than 10,000 pounds. In addition to requiring phased compliance with emission standards, Section 2485 also restricts vehicle idling to no more than five minutes at any one location and restricts the operation of an APS to no more than five minutes in any location within 100 feet of a sensitive receptor.

3.5. Climate Change

3.5.1 Federal Climate Change Legislation

The federal government is taking several common-sense steps to address the challenge of climate change. EPA collects various types of GHG emissions data. This data helps policy makers, businesses, and EPA track GHG emissions trends and identify opportunities for reducing emissions and increasing efficiency. EPA has been collecting a national inventory of GHG emissions since 1990 and in 2009 established mandatory reporting of GHG emissions from large GHG emissions sources.

EPA is also getting GHG reductions through partnerships and initiatives; evaluating policy options, costs, and benefits; advancing the science; partnering internationally and with states, localities, and tribes; and helping communities adapt.

3.5.2 State Climate Change Legislation

3.5.2.1 Executive Order S 3-05

On June 1, 2005, the Governor issued Executive Order S 3-05 which set the following GHG emission reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

To meet these targets, the Climate Action Team (CAT) prepared a report to the Governor in 2006 that contains recommendations and strategies to help ensure the targets in Executive Order S-3-05 are met.

3.5.2.2 Assembly Bill 32 (AB 32)

In 2006, the California State Legislature enacted the California Global Warming Solutions Act of 2006, also known as AB 32. AB 32 focuses on reducing GHG emissions in California. GHGs, as defined under AB 32, include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. CARB is the State agency charged with monitoring and regulating sources of emissions of GHGs in California that cause global warming in order to reduce emissions of GHGs. AB 32 also requires that by January 1, 2008, the CARB must determine what the statewide GHG emissions level was in 1990, and it must approve a statewide GHG emissions limit so it may be applied to the 2020 benchmark. CARB approved a 1990 GHG emissions level of 427 $MtCO_2e$, on December 6, 2007 in its Staff Report. Therefore, in 2020, emissions in California are required to be at or below 427 $MtCO_2e$.

Under the "business as usual or (BAU)" scenario established in 2008, Statewide emissions were increasing at a rate of approximately 1 percent per year as noted below. It was estimated that the 2020 estimated BAU of 596 $MtCO_2e$ would have required a 28 percent reduction to reach the 1990 level of 427 $MtCO_2e$.

3.5.2.3 Climate Change Scoping Plan

The Scoping Plan[29] released by CARB in 2008 outlined the state's strategy to achieve the AB-32 goals. This Scoping Plan, developed by CARB in coordination with the Climate Action Team (CAT), proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health. It was adopted by CARB at its meeting in December 2008. According to the Scoping Plan, the 2020 target of 427 $MtCO_2e$ requires the reduction of 169 $MtCO_2e$, or approximately 28.3 percent, from the State's projected 2020 BAU emissions level of 596 $MtCO_2e$.

However, in May 2014, CARB developed; in collaboration with the CAT, the First Update to California's Climate Change Scoping Plan[30] (Update), which shows that California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB-32. In accordance with the United Nations Framework Convention on Climate Change (UNFCCC), CARB is beginning to transition to the use of IPCC's Fourth Assessment Report (AR4's) 100-year GWPs in its climate change programs. CARB has recalculated the 1990 GHG emissions level with the AR4 GWPs to be 431 $MtCO_2e$, therefore the 2020 GHG emissions limit established in response to AB-32 is now slightly higher than the 427 $MtCO_2e$ in the initial Scoping Plan.

However, in May 2014, CARB developed; in collaboration with the CAT, the First Update to California's Climate Change Scoping Plan[31] (Update), which shows that California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB-32. In accordance with the UNFCCC, CARB is beginning to transition to the use of the IPCC's AR4's[32] 100-year GWPs in its climate change programs. CARB has recalculated the 1990 GHG emissions level with

29 *Climate Change Scoping Plan: a framework for change.* California Air Resources Board. December 2008.

30 First Update to the Climate Change Scoping Plan, Building on the Framework. California Air Resources Board. May 2014.

31 *First Update to the Climate Change Scoping Plan, Building on the Framework.* California Air Resources Board. May 2014.

32 *Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change.* Intergovernmental Panel on Climate Change. Core Writing Team; Pachauri, R.K; Reisinger, A., eds., 2007. ISBN 92-9169-122-4.

the AR4 GWPs to be 431 $MtCO_2e$, therefore the 2020 GHG emissions limit established in response to AB-32 is now slightly higher than the 427 $MtCO_2e$ in the initial Scoping Plan.

A Proposed Scoping Plan[33] builds upon the former Scoping Plan and Update by outlining priorities and recommendations for the State to achieve its long-term climate objectives. The Proposed Scoping Plan establishes a proposed framework of action for California to meet the climate target of a 40 percent reduction in GHGs by 2030, compared to 1990 levels. The major elements of the framework proposed are enhancement of the Renewables Portfolio Standard and the Low Carbon Fuel Standard; a Mobile Source Strategy, Sustainable Freight Action Plan, Short-Lived Climate Pollutant Reduction Strategy, Sustainable Communities Strategies, and a Post-2020 Cap-and-Trade Program; a 20 percent reduction in GHG emissions from the refinery sector and an Integrated Natural and Working Lands Action Plan.

33 *The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target.* California Air Resources Board. January 20, 2017. URL: https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf

Section 4.0 – THRESHOLDS OF SIGNIFICANCE

The ICAPCD CEQA Air Quality Handbook[34] outlines significance determination thresholds. The significance criteria described in this section have been derived from this guidance document. In addition, significance criteria for stationary sources, which are permitted by the ICAPCD, are also cited in this section of the document.

4.1. CEQA Significance Determination Thresholds

In accordance with State 2019 CEQA Guidelines Appendix G, implementation of the project would result in a potentially significant impact if it were to:

a) Conflict with or obstruct implementation of the applicable air quality plan.

b) Result in cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Each of these threshold criteria is discussed in Section 5.0 – .

4.2. ICAPCD Regional Thresholds of Significance

Under the ICAPCD guidelines, an air quality evaluation must address the following:

- Comparison of calculated project emissions with ICAPCD emission thresholds.
- Consistency with the most recent Clean Air Plan for Imperial County.
- Comparison of predicted ambient pollutant concentrations resulting from the project to state and federal health standards, when applicable.
- The evaluation of special conditions that apply to certain projects.

4.2.1 Operational Thresholds

The ICAPCD has determined in their Guidelines that, because the operational phase of a proposed project has the potential of creating lasting or long-term impacts on air quality, it is important that a proposed development evaluate the potential impacts carefully. Therefore, air quality analyses should compare all operational emissions of a project, including motor vehicle, area source, and stationary or point sources to the thresholds in Error! Reference source not found., which provides general guidelines for determining the significance of i mpacts and the recommended type of environmental analysis required based on the total emissions that are expected from the operational phase of a project.

34 *CEQA Air Quality Handbook: Guidelines for the Implementation of the California Air Quality Act of 1970 as amended.* Imperial County Air Pollution Control District. Final December 12, 2017.

Table 6 – Regional Operational Thresholds of Significance[35]

Pollutant	Emissions (lbs/day)	
	Tier I	Tier II
Carbon Monoxide (CO)	< 550	≥ 550
Reactive Organic Gases (ROG)	< 137	≥ 137
Nitrogen Oxides (NO_X)	< 137	≥ 137
Sulfur Oxides (SO_X)	< 150	≥ 150
Particulate Matter (PM_{10})	< 150	≥ 150
Particulate Matter ($PM_{2.5}$)	< 550	≥ 550

From the ICAPCD's perspective residential, commercial and industrial developments with a potential to emit below Tier I level will not be required to develop a Comprehensive Air Quality Analysis Report (CAQAR) or an Environmental impact report (EIR). However, an Initial Study would be required to help the Lead Agency determine whether the project would have a less than significant impact. The Lead Agency is required by CEQA to disclose the identified environmental effects and the ways in which the environmental effects will be mitigated to achieve a level of less than significant. To achieve a level of insignificance the Lead Agency should require the implementation of all feasible standard mitigation measures listed in Section 7.2 of the ICAPCD Guidelines.

4.2.2 Construction Thresholds

In general, projects whose operational emissions qualify them as Tier I do not need to quantify their construction emissions; instead they adopt the standard mitigation measures for construction (See **Section 5.0**). The CEQA Guidelines states the "approach of the CEQA analyses for construction particulate matter impacts should be qualitative as opposed to quantitative."

4.2.3 Local Concentrations of Criteria Pollutant Thresholds

Even though the ICAPCD's CEQA Guidelines does not specifically address localized impacts from criteria pollutants, this AQIA analyzes the potential criteria pollutant health risks pursuant to the published opinion of *Sierra Club v. County of Fresno*[36] that a project with potential significance should provide an analysis of potential correlation that would be generated by the Project to adverse human health impacts that could be expected to result from the increase in criteria emissions for pollutants that exceed air quality standards.

4.2.4 Toxics or Hazardous Air Pollutant Thresholds

The ICAPCD has also determined that any project with the potential to expose sensitive receptors or the general public to substantial levels of TACs would be deemed to have a potentially significant impact. A health risk is the probability that exposure to a TAC under a given set of conditions will result in an adverse health effect. The term "risk" usually refers to the chance of contracting cancer as a result of an exposure, and it is expressed as a probability: chances-in-a-million. The values expressed for cancer risk do not predict

35 *ibid*

36 *Sierra Club v. County of Fresno*, Fifth District Court of Appeal. May 27, 2014.

actual cases that will result from exposure to toxic air contaminants. Rather, they state a probability of contracting cancer over and above the background level and over a given exposure to toxic air contaminants.

Since the ICAPCD has not adopted a quantitative health risk significance threshold for TAC emissions, the thresholds provided in the California Air Pollution Control Officers Association (CAPCOA) Guidelines have been utilized. According to the CAPCOA Guidelines, any project that has the potential to expose the public to TACs in excess of the following threshold would be considered to result in a significant impact:

- If the Maximum Exposed Individual (MEI) Cancer Risk from carcinogens equals or exceeds 10 in one million persons.
- If the MEI Acute Hazard Index from non-carcinogens equals or exceeds 1.0, or
- If the MEI Chronic Hazard Index from non-carcinogens equals or exceeds 1.0.

4.2.5 Odor Threshold

While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and the District. Any project with the potential to expose members of the public to objectionable odors frequently would be deemed to have a significant impact.

4.3. Greenhouse Gas (GHG) / Climate Change

4.3.1 California Environmental Quality Act (CEQA)

Effective March 18, 2010, CEQA Appendix G states that a project would have potentially significant GHG emission impacts if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

4.3.2 Local Significance Thresholds

It is widely recognized that no single project could generate enough GHG emissions to change the global climate temperature noticeably. However, the combination of GHG emissions from past, present, and future projects could contribute substantially to global climate change. Thus, project specific GHG emissions should be evaluated in terms of whether they would result in a cumulatively significant impact on global climate change.

Since the County of Imperial has not established a threshold of significance for GHGs, the ICAPCD recommends that the project be evaluated based on strategies developed by the CAT in a 2006 Report[37] that set the framework for the State's emission reduction strategies that could be implemented in California to reduce climate change emissions to ensure that the targets of AB-32 are met.

[37] Climate Action Team Report to Governor Schwarzenegger and the Legislature. California Environmental Protection Agency. March 2006.

Section 5.0 – ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

5.1. Analysis Methodology

Regional and local emissions of criteria air pollutants and precursors, and GHGs during project operations were assessed in accordance with the methodologies described below to ascertain impacts from the facility due to amended CUP.

5.1.1 Construction Emissions

Since this project is an amendment to the existing CUP to address non-compliance issues, no construction activities are involved. Therefore, no analysis of construction emissions was necessary.

5.1.2 Operational Emissions

To estimate emissions related to the amendment of the CUP, the entire facility was analyzed. Exhaust emissions from the heavy-duty diesel (HDD) trucks bringing hay to the facility, HDD trucks used to shuttle product between BRS 1 and BRS 2, and HDD trucks taking the pressed product to AAG to be shipped out were assessed. Additionally, exhaust emissions from employee commute vehicles were assessed.

Estimated activity levels of on-road vehicles were obtained from the Project's Traffic Impact Analysis (TIA)[38] and vehicle emission factors based on Imperial County-specific vehicle activity in the calendar year 2016 were obtained from the latest EMFAC2017 model[39] by CARB. Estimated activities and engine size for on-site, off-road equipment were provided by the Client and emission factors were obtained from the California Emissions Estimator Model (CalEEMod™) Guidelines[40].

A detailed summary of the assumptions and model data used to estimate the Project's operational emissions is provided in Appendix A.

5.1.3 Toxic Air Contaminant Emissions

The proposed project is anticipated to generate DPM emissions from on-road vehicle operations and off-road equipment. All emissions are based on the current, year 2020 emissions rates. In order to provide a worst-case analysis, this analysis analyzes the impacts from all DPM emissions created from Blair Ranch.

5.1.3.1 Off-Road Diesel Equipment

The OFFROAD2017 Web Database[41] was utilized to calculate the DPM emissions from each piece of equipment that operates on the project site. The OFFROAD2017 model only provides a limited number of types of off-road vehicles, as such the most similar types available to the off-road equipment utilized onsite were selected, which include off-highway trucks, rubber-tired loaders, tractors/loaders/backhoes, and forklifts. It should be noted that the DPM emission rates for each type of equipment needs to meet the same Tier 4 standards, so an exact match to the equipment used is not required to provide a reasonable estimate of DPM emissions created from each piece of equipment.

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38 Traffic Impact Analysis. Blair Ranch Project. County of Imperial, California. Linscott, Law & Greenspan. November 8, 2019.

39 EMFAC2017 Web Database (v1.0.2). California Air Resources Board. http://www.arb.ca.gov/emfac/2017/. Accessed November 2019.

40 Appendix D: Default Data Tables for CalEEMod. South Coast Air Quality Management District. February 2011

41 https://www.arb.ca.gov/orion/

5.1.3.2 Off-Road Diesel Equipment

The truck trips generated from the proposed project have been calculated through use of vehicle trip rates provided in the TIA.[42] The truck travel was modeled with line volume sources of Blair Road and Highway 115 within a four square kilometer area as well as a line volume source of the anticipated onsite truck travel. According to the TIA, 32 percent of the truck trips will travel on Blair Road north of the project site driveway and 68 percent would travel on Blair Road south of the project site driveway and would continue on Highway 115 to the west.

The emission factors used for the roadway line volume sources was obtained from a model run of EMFAC2017 Model Version 1.0.2 for Imperial County for the year 2020. The onsite truck travel was analyzed based on a speed of 15 miles per hour and the travel on Blair Road and Highway 115 were analyzed based on a speed of 45 miles per hour.

5.1.3.3 On-Site Truck Idling

The onsite diesel truck idling was modeled as one point-source located at the central area of where trucks are anticipated to operate. The analysis was based on all 320 daily truck trips to or from the project site idling for five minutes.

5.1.4 Other Air Quality Impacts

Other air quality impacts (i.e., local emissions of CO, and odors) were assessed in accordance with methodologies recommended by CARB and ICAPCD.

5.2. Analysis of Environmental Impacts

IMPACT 1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

CEQA requires that projects be consistent with the applicable AQMP. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision-makers of the environmental efforts of the project under consideration at a stage early enough to ensure that air quality concerns are fully addressed.

ICAPCD's CEQA Handbook states that a CAQAR of a proposed project should demonstrate compliance with the most recent ozone AQMP and PM_{10} SIP. It also states the CAQAR should demonstrate compliance with the Imperial County Rules and Regulations as well as the State and federal regulations.

<u>Ozone Air Quality Management Plan (AQMP)</u>

In order to develop the Modified AQMP[43], a control strategy for meeting State and federal requirements is required. The ICAPCD control strategy included an interactive process of technology and strategy review supported by ambient air quality modeling. The air quality modeling assists in identifying current and remaining emission targets that would help to achieve the ambient air quality standards. The Modified AQMP control measures consist of three components: 1) the ICAPCD's Stationary Source Control Measures; 2)

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42 Traffic Impact Analysis. Blair Ranch Project. County of Imperial, California. Linscott, Law & Greenspan. November 8, 2019.

43 *Final 2009 1997 8-Hour Modified Air Quality Management Plan.* Imperial County Air Pollution Control District. July 13, 2010.

Regional Transportation Strategy and Control Measures; and 3) State Strategy. These measures primarily rely on the traditional command and control approach and as such provide the framework for ICAPCD Rules that reduce ROG and NO_X emissions.

The Project does not produce new residential activity, produces only minimal additional traffic activity during project operations; and does not fall outside of the modeling forecast estimations used in determining continued maintenance.

PM_{10} State Implementation Plan (PM_{10} SIP)

The PM_{10} SIP was required to address and meet the following elements, required under the FCAA of areas classified to be in serious nonattainment of the NAAQS:

- Best available emission inventories.
- A plan that enables attainment of the PM_{10} federal air quality standards.
- Annual reductions in PM_{10} or PM_{10} precursor emissions that are of not less than 5 percent from the date of SIP submission until attainment.
- Best available control measures and best available control technologies for significant sources and major stationary sources of PM_{10}, to be implemented no later than 4 years after reclassification of the area as serious.
- Transportation conformity and motor vehicle emission budgets in accord with the attainment plan.
- Reasonable further progress and quantitative milestones.
- Contingency measures to be implemented (without the need for additional rulemaking actions) if the control measure regulations incorporated in the plan cannot be successfully implemented or fail to give the expected emission reductions.

In November 2005, revised Regulation VIII fugitive dust control measures were adopted, which form the core of the Imperial County PM_{10} control strategy. The Project is required to comply with all applicable Regulation VIII measure.

Level of Significance Before Mitigation: The Project would not conflict with, or obstruct implementation of, the applicable air quality plan, therefore would result in a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

Level of Significance After Mitigation: Impacts would be less than significant.

IMPACT 2: Would the Project result in cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?

In accordance with CEQA Guidelines 15130(b), this analysis of cumulative impacts incorporates a summary of projections. The following three-tiered approach is to assess cumulative air quality impacts.

- Consistency with the ICAPCD project specific thresholds for construction and operation.
- Project consistency with existing air quality plans.
- Assessment of the cumulative health effects of the pollutants.

Project Specific Thresholds

As established previously in Impact 2, implementation of mitigations and compliance with ICAPCD regulations are expected to reduce impacts such that the Project will not exceed the ICAPCD regional significance thresholds. It is assumed that emissions that do not exceed the project specific thresholds will not result in a cumulative impact.

Air Quality Plans

The area in which the Project is located is in nonattainment for ozone and PM_{10}. As such, the ICAPCD is required to prepare and maintain an AQMP to document the strategies and measures to be undertaken to reach attainment of ambient air quality standards. As discussed above in Impact 1, the Project is compliant with the AQMP and would not result in a significant impact.

Cumulative Health Impacts

The area is in nonattainment for ozone and PM_{10}, which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some of the sensitive individuals of the population experience adverse health effects.

The localized significance analysis in Impact 3 showed that during construction no localized adverse exposure was expected; therefore, the emissions of particulate matter and NO_X would not result in a significant cumulative health impact.

Project Related Construction Emissions

As discussed in Section 5.1.1, this project is an amendment to the existing CUP to address non-compliance issues, no construction activities are involved. Therefore, no analysis of construction emissions was necessary.

Project Related Operational Emissions

Emission factors for vehicular activity related to HDD trucks hauling to and from the Project and commute of employees were estimated using CARB's latest EMFAC2017 model[44] with emission rate data for Imperial County for the 2020 calendar year. For most truck trips, this AQIA used aggregate model years, which is an average age of vehicles specific for Imperial County. The Project will use only California-carriers for all outbound traffic, which will be following Title 13, Section 2025[45] of the CCR. For carriers transporting finished product from Project, all truck fleets to be model year 2010 or newer.

To generate expected exhaust emissions from employee vehicles, this AQIA also used CARB's latest EMFAC2017 model. In order to represent the type of vehicles used by the potential employee work pool more accurately, an activity-weighted average emission factor was generated using light-duty automobiles and light-duty trucks. The weighted averages were derived from the distributions of vehicle miles travelled (VMT) in 2020 in Imperial County from EMFAC2017.

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44 *EMFAC2017 Web Database.* California Air Resources Board. https://www.arb.ca.gov/emfac/2017/. Accessed November 2019.

45 Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles. Section 2025, Title 13, Article 4.5, Chapter 1 of the California Code of Regulations.

Number of proposed on-road vehicles used was obtained from the TIA[46] and estimated trip lengths were assumed by assuming that 50 percent of employees would come from El Centro, with the other half originating in nearer Brawley. The trip lengths for the haulers bringing product to the Project were provided by Fondomonte and estimated to be 64.92 percent from Imperial Valley, equally distributed between southern and northern portion; 23.36 percent from the areas around Blythe California; 9.72 percent from the areas around Yuma Arizona; and 2 percent from the areas around Poston Arizona.

Emission factors for off-road equipment used on-site were taken from the Data Tables in the latest CalEEMod Guidance Document. Specific list of equipment was assigned an appropriate equipment type categorized in CARB's OFFROAD modeler and where necessary brake-horsepower were obtained from Fondomonte.

In addition, entrained road dust emissions were assigned to haulers and employees. The ICAPCD usually recommends that 50 percent of vehicular travel in Imperial County is assumed to be on unpaved roads. For this AQIA however, since employees will be using a parking area adjacent to a paved road, all employee commute trips will be on paved roads. This AQIA also assumed that all the hauler fleets travel will be on paved roads. Since vendors may travel some on unpaved roads to deliver materials or provide service, 5 percent of vendor activity is assigned to the potential of off-road activity. The shuttle trucks to and from BSR 2 were assumed to 50 percent of their travel on dirt roads.

Table 7 summarizes project-related annual operational air emissions. The ICAPCD thresholds of significance are also included in this table as well as information regarding whether annual operational emissions would exceed those thresholds. As shown in **Table 7**, operational emissions would be well below ICAPCD Tier 1 Regional thresholds. Detailed emissions calculations are included in Appendix A.

Table 7 – Project Operational Unmitigated Emissions

Emission Sources	Criteria Emissions (lbs/d)				
	ROG	CO	NO_x	PM_{10}	$PM_{2.5}$
On-road sources	1.26	11.67	6.10	5.15	4.26
Off-road equipment	4.74	36.70	52.29	2.63	1.99
Entrained road dust	—	—	—	52.56	6.01
Total	**6.0**	**48.4**	**58.4**	**60.3**	**12.3**
ICAPCD Regional Thresholds	*137*	*550*	*137*	*150*	*550*
Exceed Thresholds?	No	No	No	No	No

Level of Significance Before Mitigation: The Project would not result in cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard, therefore would result in a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

Level of Significance After Mitigation: Impacts would be less than significant.

46 *Traffic Impact Analysis – Blair Ranch Project.* Linscott Law & Greenspan. November 8, 2019.

EEC ORIGINAL PKG.

IMPACT 3: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are defined as land uses where sensitive population groups are likely to be located (e.g., children, the elderly, the acutely ill, and the chronically ill). These land uses include residences, schools, childcare centers, retirement homes, convalescent homes, medical care facilities, and recreational facilities. Sensitive receptors that may be adversely affected by the Project include the surrounding residential land uses.

The nearest sensitive receptor to the Project site consist of a farmhouse located approximately 2,500 feet east of the Project site and approximately 195 feet north of Highway 115 centerline and single-family homes located as near as 2,700 feet west of the Project site and as near as 60 feet south of Highway 115 centerline.

Toxic Air Contaminants

Due to the Project's ongoing reliance on heavy duty diesel trucks and diesel off-road equipment, an assessment of the potential health risk from TAC emissions resulting from the operation of the Project was conducted and the Health Risk Assessment (HRA)[47] is presented in full in Appendix B. The HRA was conducted, in part, to determine the potential cancer and non-cancer (acute and chronic) risks associated with the operation of the Project. Health risks from TACs are twofold; 1) TACs are carcinogens according to the State and 2) short-term acute and long-term chronic exposure to TACs can cause chronic and/or acute health effects to the respiratory system. The HRA concluded:

- All DPM emissions concentrations at the nearby sensitive receptors were found to be below the 10.0 in a million cancer risk threshold. Therefore, a less than significant cancer risk would occur from DPM emissions created from the operation of the Project.
- The on-going operations of the Project would result in a less than significant impact due to the non-cancer chronic and acute health risks from TAC emissions created by the Project.

CO Hot spots

Another way a project can establish significance with this impact is the potential to create a CO hotspot. CO hotspots can occur when vehicles are idling at highly congested intersections. According to the TIA, the Project would not create an increase in congestion of the magnitude required to generate a CO hotspot.

Level of Significance Before Mitigation: The Project would not expose the public to substantial pollutant concentrations.

Mitigation Measures: No mitigation measures are necessary.

Level of Significance After Mitigation: Impacts would be less than significant.

IMPACT 4: Would the Project create objectionable odors affecting a substantial number of people?

The CEQA Guidelines indicate that a significant impact would occur if a project would create objectionable odors affecting a substantial number of people. While offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and the ICAPCD. Because offensive odors rarely cause any physical harm and no

47 *Health Risk Assessment: Blair Ranch Expansion Project, County of Imperial.* Vista Environmental. January 27, 2020.

requirements for their control are included in State or federal air quality regulations, the ICAPCD has no rules or standards related to odor emissions, other than its nuisance rule.

The construction and operation of a hay processing facility is not an odor producer nor located near an odor producer; therefore, the Project would not result in a significant odor impact.

Level of Significance Before Mitigation: The Project would not create objectionable odors affecting a substantial number of people.

Mitigation Measures: No mitigation measures are necessary.

Level of Significance After Mitigation: Impacts would be less than significant.

IMPACT 5: Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

The Project would generate GHG emissions operational activities at the site and off the site. On-site activities' GHG emissions would be generated primarily by on-site diesel equipment, e.g. forklifts, loaders, and water truck. Off-site GHG emissions would primarily come from HDD trucks, with the majority from the haulers from the fields to the Project site. GHG emissions were estimated using all the methodologies listed above for criteria emissions. **Table 8** shows that the annual operation emissions for the Project and detailed calculations are presented in Appendix A.

Table 8 – Project Operational GHG Emissions

Emission Sources	GHG Emissions (tonnes/year)			
	CO_2	CH_4	N_2O	CO_2e
Off-site sources	3,404.6	0.022	0.430	3,533.2
On-site sources	720.8	0.233	N/A	726.6
Total	**4,125**	**0.255**	**0.430**	**4,260**

Level of Significance Before Mitigation: The Project would generate GHG emissions that may have a significant impact on the environment.

Mitigation Measures:

The ICAPCD has determined that compliance with applicable State GHG emission reduction strategies would constitute feasible mitigation. **Table 9** presents Project's design and/or mitigation that demonstrates compliance with applicable State GHG strategies presented in the CAT report.

Table 9 – California Greenhouse Gas Emission-Reduction Strategies

Strategy	Project Design/Mitigation to Comply with Strategy
Vehicle Climate Change Standards: AB 1493 (Pavley) required the State to develop and adopt regulations to achieve the most feasible and cost-effective reduction in climate change emissions emitted by passenger vehicles and light-duty trucks. Regulations were adopted by CARB in September 2004.	These are CARB-enforced standards; vehicles subject to these standards/measures that would access the proposed project would be complying.
Other Light-duty Vehicle Technology: New standards would be adopted and phased in beginning in the 2017 model year.	
Heavy-duty Vehicle Emission Reduction Measures: Increased efficiency in the design of heavy-duty vehicles and an educational program for the heavy-duty vehicle sector.	
Diesel Anti-Idling: In July 2004, CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling.	This is a CARB-enforced measure; vehicles subject to this measure that would access the proposed project would be complying.
Hydrofluorocarbon Reduction: 1) ban retail sale of HFC in small cans, 2) require that only low-GWP refrigerants be used in new vehicular systems, 3) adopt specifications for new commercial refrigeration, 4) add refrigerant leak-tightness to the pass criteria for vehicular inspection and maintenance programs, 5) enforce Federal ban on releasing HFCs.	Not applicable.
Transportation Refrigeration Units (TRUs), Off-road Electrification, Port Electrification: Strategies to reduce emissions from TRUs, increase off-road electrification, and increase use of shore-side/port electrification.	Not applicable.
Manure Management: The proposed San Joaquin Valley Rule 4570 would reduce volatile organic compounds from confined animal facilities through implementation of control options.	Not applicable.
Alternative Fuels – Biodiesel Blends: CARB would develop regulations to require the use of 1% to 4% biodiesel displacement in California diesel fuel.	Not applicable.
Alternative Fuels – Ethanol: Increased use of ethanol fuel.	Not applicable.
Achieve 50% Statewide Recycling Goal: Achieving the State's 50% waste diversion mandate, as established by the Integrated Waste Management Act of 1989 (AB 939 [Sher]), Chapter 1095, Statutes of 1989), will reduce climate change emissions associated with energy-intensive material extraction and production as well as methane emission from landfills. A diversion rate of 48% has been achieved on a statewide basis. Therefore, a 2% additional reduction is needed.	Not applicable.
Zero Waste – High Recycling: Additional recycling beyond the State's 50% recycling goal.	Not applicable.
Landfill Methane Capture: Implement direct gas use or electricity projects at landfills to capture and use emitted methane.	Not applicable. The proposed project does not include landfill operations.
Urban Forestry: A new statewide goal of planting 5 million trees in urban areas by 2020 would be achieved through the expansion of local urban forestry programs.	Not applicable. The proposed project is not in an urban area.
Afforestation/Reforestation Projects: Reforestation projects focus on restoring native tree cover on lands that were previously forested and are now covered with other vegetative types.	Not applicable. The proposed project area has not been forested in recent times.
Water Use Efficiency: 19% of all electricity, 30% of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute, and use water and wastewater. Increasing the efficiency of water transport and reducing water usage would reduce GHG emissions.	Not applicable. The project is not a water supply entity.

Strategy	Project Design/Mitigation to Comply with Strategy
Building Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes the California Energy Commission (CEC) to adopt and periodically update its building energy efficiency standards, which apply to newly constructed buildings and additions and alterations to existing buildings.	Not applicable. The project does not include any construction activity.
Appliance Energy Efficiency Standards in Place and in Progress: Public Resources Code 25402 authorizes CEC to adopt and periodically update its appliance energy efficiency standards, which apply to equipment and devices that use energy and are sold or offered for sale in California.	Not applicable. The project does not include new appliance acquisition.
Cement Manufacturing: Cost-effective actions to reduce energy consumption and lower carbon dioxide emissions in the cement industry.	Not applicable. The proposed project does not include cement manufacturing operations.
Smart Land Use and Intelligent Transportation Systems (ITS): Smart land use strategies encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. It is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and services. Governor's office is finalizing a comprehensive 10-year strategic growth plan with the intent of developing ways to promote, through State investments, incentives, and technical assistance, land use and technology strategies that provide for a prosperous economy, social equity, and a quality environment. Smart land use, demand management, ITS, and value pricing are critical elements for improving mobility and transportation efficiency. Specific strategies include promoting jobs/housing proximity and transit-oriented development, encouraging high-density residential/commercial development along transit/rail corridors, value and congestion pricing, ITS, traveler information/traffic control, incident management, accelerating the development of broadband infrastructure, and comprehensive, integrated, multimodal/intermodal transportation planning.	Not applicable. The project is not in a metropolitan or urban area.
Enteric Fermentation: Cattle emit methane from digestion processes. Changes in diet could result in a reduction in emissions.	Not applicable. The project does not include any cattle operations.
Green Buildings Initiative: Green Building Executive Order S-20-04 sets a goal of reducing energy use in public and private buildings by 20% by 2015 compared with 2003 levels. Consistent with mitigation.	Not applicable. The project does not include any construction activity.
California Solar Initiative: Installation of 1 million solar roofs on homes and businesses, or an equivalent 3,000 megawatts, by 2017; increased use of solar thermal systems to offset the increasing demand for natural gas; use of advanced metering in solar applications; and the creation of a funding source that can provide rebates over 10 years through a declining incentive schedule.	Not applicable. The project does not include any construction activity.

Source: State of California, Environmental Protection Agency, Climate Action Team, 2006

Level of Significance After Mitigation: Impacts would be less than significant.

EEC ORIGINAL PKG.

IMPACT 6: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Neither the County of Imperial nor ICAPCD have any specific plans, policies, nor regulations adopted for reducing the emissions of GHGs but CARB's First Update to their Scoping Plan[48] included a table presenting the recommended actions the State should take in each of the sectors to meet our climate change goals. The Project does not conflict with any of these recommended actions. Since the operational and construction emissions associated with the Project would not conflict with any applicable plan, policy, or regulation adopted for reducing the emissions of GHGs.

Level of Significance Before Mitigation: The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Mitigation Measures: No mitigation measures are necessary.

Level of Significance After Mitigation: Impacts would be less than significant.

48 *First Update to the Climate Change Scoping Plan: Building on the Framework Pursuant to AB 32, The California Global Warming Solutions Act of 2006.* California Air Resources Board. May 22, 2014.

OB-1
AIR ANALYSES

APPENDIX A

Air Quality/Climate Change Calculations

EEC ORIGINAL PKG.

Summary of Emissions

Adjusted Operational Emissions

Sources	Maximum pounds per day					(tonnes/y)
	ROG	CO	NO_X	PM_{10}	$PM_{2.5}$	CO_2e
On-road	1.26	11.67	6.10	5.15	4.26	3,533.2
Off-road equipment	4.74	36.70	52.29	2.63	1.99	726.6
Entrained Road Dust	-----	-----	-----	52.56	6.01	-----
Totals	***6.0***	***48.4***	***58.4***	***60.3***	***12.3***	***4,259.8***
Operational Thresholds	*137*	*550*	*137*	*150*	*550*	

EEC ORIGINAL PKG.

Operational On-road Emissions

Truck Activity

Expanded Activity	# Vehicles per Day	Trip Length (one-way)	VMT per day	VMT per year
Raw product to Blair Ranch #2	100	39.8	3,980	1,590,315
Shuttle Trucks from Blair Ranch #2	39	1.50	117	73,209
Processed hay to AAG	60	1.0	120	75,086
TOTAL	***199***		***4,217***	***1,738,610***

Light Duty Vehicle Activity

Expanded Activity	# Vehicles per Day	Trip Length (one-way)	VMT per day	VMT per year
Employees	96	21.5	4,128	2,582,949
TOTAL	***96***	***22***	***4,128***	***2,582,949***

Criteria Emissions

Expanded Activity	Pounds per day				
	ROG	CO	NO_x	PM_{10}	$PM_{2.5}$
Raw product to BSR2	1.06	1.20	4.12	4.67	4.06
Shuttle Trucks from BSR2	0.01	0.03	0.55	0.03	0.01
Processed hay to AAG	0.01	0.03	0.57	0.03	0.02
Employees	0.19	10.40	0.86	0.42	0.18
Totals	***1.3***	***11.7***	***6.1***	***5.2***	***4.3***

GHG

Expanded Activity	Tonnes per Year			
	CO_2	CH_4	N_2O	CO_2e
Raw product to BSR2	2,397.23	0.0089	0.3768	2,509.7
Shuttle Trucks from BSR2	105.09	0.0001	0.0165	110.0
Processed hay to AAG	107.78	0.0001	0.0169	112.8
Employees	794.46	0.0126	0.0197	800.6
Totals	***3,404.6***	***0.022***	***0.430***	***3,533.2***

Operational Off-Road Diesel Emissions

Criteria Emissions

Equipment Type	Activity			Criteria Emission Factors (g/bhp-hr)					Criteria Emissions (lbs/d)				
	BHP	Load Factor	hrs/ day	ROG	CO	NO_x	PM_{10}	$PM_{2.5}$	ROG	CO	NO_x	PM_{10}	$PM_{2.5}$
Hyster - H80FT	78	0.20	10	0.459	3.760	4.133	0.520	0.283	0.16	1.29	1.42	0.18	0.10
Hyster - H80FT	78	0.20	10	0.459	3.760	4.133	0.520	0.283	0.16	1.29	1.42	0.18	0.10
Hyster - H210HD2	155	0.20	8	0.338	3.249	3.320	0.180	0.165	0.18	1.78	1.81	0.10	0.09
Hyster - H210HD2	155	0.20	8	0.338	3.249	3.320	0.180	0.165	0.18	1.78	1.81	0.10	0.09
Hyster - H210HD2	155	0.20	8	0.338	3.249	3.320	0.180	0.165	0.18	1.78	1.81	0.10	0.09
H80FT	78	0.37	10	0.331	3.601	3.326	0.210	0.193	0.21	2.29	2.12	0.13	0.12
H80FT	59	0.37	2	0.331	3.601	3.326	0.210	0.193	0.03	0.35	0.32	0.02	0.02
Hyster RS 45-31 CH	365	0.36	10	0.289	1.630	3.017	0.112	0.103	0.84	4.72	8.74	0.32	0.30
Hyster RS 45-31 CH	365	0.36	10	0.289	1.630	3.017	0.112	0.103	0.84	4.72	8.74	0.32	0.30
JBC - 437	181	0.36	10	0.379	3.368	3.517	0.194	0.178	0.54	4.84	5.05	0.28	0.26
JBC - 437	181	0.36	10	0.379	3.368	3.517	0.194	0.178	0.54	4.84	5.05	0.28	0.26
Kubota - RTV X900	21.6	0.50	8	N/A	2.682	7.510	0.416	N/A	N/A	0.51	1.43	0.08	N/A
Kubota - RTV X900	21.6	0.50	8	N/A	2.682	7.510	0.416	N/A	N/A	0.51	1.43	0.08	N/A
Kubota - RTV X900	21.6	0.50	8	N/A	2.682	7.510	0.416	N/A	N/A	0.51	1.43	0.08	N/A
Kubota SRFTZ-X900	21.6	0.50	8	N/A	2.682	7.510	0.416	N/A	N/A	0.51	1.43	0.08	N/A
Kenworth T370 Tractor (2019)	350	0.38	12	0.246	1.414	2.347	0.086	0.079	0.87	4.98	8.26	0.30	0.28
								Totals	***4.7***	***36.7***	***52.3***	***2.6***	***2.0***

EEC ORIGINAL PKG.

Greenhouse Gas Emissions

Equipment Type	Activity			EmFacs (g/bhp-hr)		GHG Emissions (tonnes/year)		
	BHP	Load Factor	Annual Hours	CO_2	CH_4	CO_2	CH_4	CO_2e
Hyster - H80FT	78	0.20	2,607	471.5	0.153	19.18	0.0062	19.33
Hyster - H80FT	78	0.20	2,607	471.5	0.153	19.18	0.0062	19.33
Hyster - H210HD2	155	0.20	2,086	472.1	0.153	30.53	0.0099	30.77
Hyster - H210HD2	155	0.20	2,086	472.1	0.153	30.53	0.0099	30.77
Hyster - H210HD2	155	0.20	2,086	472.1	0.153	30.53	0.0099	30.77
H80FT	78	0.37	2,607	475.2	0.154	35.75	0.0116	36.04
H80FT	59	0.37	521	475.2	0.154	5.41	0.0018	5.45
Hyster RS 45-31 CH	365	0.36	1,564	466.8	0.151	95.95	0.0310	96.72
Hyster RS 45-31 CH	365	0.36	1,564	466.8	0.151	95.95	0.0310	96.72
JBC - 437	181	0.36	2,607	471.2	0.152	80.05	0.0259	80.70
JBC - 437	181	0.36	2,607	471.2	0.152	80.05	0.0259	80.70
Kubota - RTV X900	21.6	0.50	2,086	N/A	N/A	N/A	N/A	N/A
Kubota - RTV X900	21.6	0.50	2,086	N/A	N/A	N/A	N/A	N/A
Kubota - RTV X900	21.6	0.50	2,086	N/A	N/A	N/A	N/A	N/A
Kubota SRFTZ-X900	21.6	0.50	2,086	N/A	N/A	N/A	N/A	N/A
Kenworth T370 Tractor (2019)	350	0.38	3,129	475.2	0.153	197.71	0.0637	199.30
					Totals	***720.8***	***0.233***	***726.6***

EEC ORIGINAL PKG.

Off-Road Diesel Equipment

Unmitigated Emission Factors for 2020

Equipment Description	OFFROAD Category	BHP	Load Factor	2020 Emission Factors (g/bhp-hr)						
				ROG	CO	NO_x	PM_{10}	$PM_{2.5}$	CO_2	CH_4
Hyster - H80FT	forklifts	78	0.20	0.459	3.760	4.133	0.520	0.283	471.5	0.153
Hyster - H210HD2	forklifts	155	0.20	0.338	3.249	3.320	0.180	0.165	472.1	0.153
H80FT	tractors/loaders/backhoes	78	0.37	0.331	3.601	3.326	0.210	0.193	475.2	0.154
H80FT	tractors/loaders/backhoes	59	0.37	0.331	3.601	3.326	0.210	0.193	475.2	0.154
Hyster RS 45-31 CH	rubber tired loader	365	0.36	0.289	1.630	3.017	0.112	0.103	466.8	0.151
JBC 437	rubber tired loader	181	0.36	0.379	3.368	3.517	0.194	0.178	471.2	0.152
Kenworth T370 Tractor	off-highway trucks	350	0.38	0.246	1.414	2.347	0.086	0.079	474.6	0.153

* *Horsepowers are provided by Client*

* *Load factors and emission factors are from CalEEMod™* Version 2016.3.2 Users Guide, Appendix D

Kubota Emfacs

	NO_x	CO	PM
kwh	5.6	2	0.31
hp-hr	7.51	2.68	0.416

Data from Engine Model Summary. Nonroad CI. Kubota Corporation. Enigine Family Executive Order U-R-025-0567-1. April 8, 2013.

EMFAC2017 (v1.0.2)

2020 Estimated Annual Emission Rates

EMFAC2011 Vehicle Categories

Imperial COUNTY

Vehicle Info			Emission Factor (grams/mile)											
Type	Fuel	VMT	ROG	CO	NO_x	PM_{10}			$PM_{2.5}$			CO_2	CH_4	N_2O
						Exhaust	TW+BW	Total	Exhaust	TW+BW	Total			
LDA	GAS	5,522,650	0.0140	0.8758	0.0569	0.0014	0.0448	0.0462	0.0013	0.0178	0.0190	285.0	0.0034	0.0057
LDA	DSL	46,428	0.0197	0.2107	0.1439	0.0127	0.0448	0.0575	0.0122	0.0178	0.0299	200.7	0.0009	0.0315
LDT1	GAS	604,690	0.0558	2.5314	0.2368	0.0027	0.0448	0.0475	0.0025	0.0178	0.0203	337.3	0.0123	0.0152
LDT1	DSL	323	0.2283	1.3672	1.3757	0.1887	0.0448	0.2335	0.1806	0.0178	0.1983	395.7	0.0106	0.0622
LDT2	GAS	1,895,865	0.0294	1.5067	0.1576	0.0016	0.0448	0.0464	0.0015	0.0178	0.0193	366.6	0.0068	0.0108
LDT2	DSL	9,803	0.0162	0.1079	0.0693	0.0086	0.0448	0.0533	0.0082	0.0178	0.0259	270.9	0.0008	0.0426
Weighted Avg for Employees & Visitors			***0.0208***	***1.1430***	***0.0945***	***0.0016***	***0.0448***	***0.0464***	***0.0015***	***0.0178***	***0.0193***	***307.6***	***0.0049***	***0.0076***
T7 Single	DSL	10,860	0.1205	0.1372	0.4694	0.4461	0.0857	0.5318	0.4268	0.0355	0.4623	1,507.4	0.0056	0.2369
T7 MY2010+	DSL	6,452	0.0294	0.1278	2.1417	0.0229	0.0977	0.1207	0.0219	0.0355	0.0574	1,435.5	0.0014	0.2256

Notes: - Criteria and GHG factors come from EMFAC2017 for Calendar Year 2020 and represent Estimated Annual Emission Rates for Imperial County

EMFAC2017 (v1.0.2) Emission Rates

Region Type: County
Region: Imperial
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2011 Categories

Regulation Compliant T7 Single Vehicles (2010 or newer)

Region	VehClass	MdlYr	VMT	ROG	CO	NO_X	PM_{10} Ex	$PM_{2.5}$ Ex	CO_2	CH_4	N_2O
Imperial	T7 Single	2010	519.0	0.1227	0.2773	6.2698	0.0436	0.0417	1,638.5	0.0057	0.2575
Imperial	T7 Single	2011	792.2	0.0712	0.1748	3.1517	0.0438	0.0419	1,592.4	0.0033	0.2503
Imperial	T7 Single	2012	1376.2	0.0152	0.1178	2.3867	0.0227	0.0217	1,579.4	0.0007	0.2483
Imperial	T7 Single	2013	665.4	0.0147	0.1137	2.1741	0.0210	0.0201	1,567.7	0.0007	0.2464
Imperial	T7 Single	2014	1056.9	0.0133	0.1034	1.2714	0.0168	0.0161	1,292.4	0.0006	0.2032
Imperial	T7 Single	2015	507.8	0.0128	0.0995	1.0473	0.0152	0.0146	1,274.7	0.0006	0.2004
Imperial	T7 Single	2016	546.9	0.0125	0.0973	1.0086	0.0143	0.0137	1,274.7	0.0006	0.2004
Imperial	T7 Single	2017	325.2	0.0122	0.0949	0.9668	0.0133	0.0127	1,238.0	0.0006	0.1946
Imperial	T7 Single	2018	326.9	0.0119	0.0924	0.9220	0.0122	0.0116	1,238.0	0.0006	0.1946
Imperial	T7 Single	2019	335.7	0.0116	0.0897	0.8740	0.0110	0.0105	1,238.0	0.0005	0.1946
			Weighted Average	***0.0294***	***0.1278***	***2.1417***	***0.0229***	***0.0219***	***1,435.5***	***0.0014***	***0.2256***

Imperial County T7 Single Vehicles Aggregated

Region	VehClass	MdlYr	VMT	ROG	CO	NO_X	PM_{10} Ex	$PM_{2.5}$ Ex	CO_2	CO_2	CO_2
Imperial	T7 Single	Aggregate	10,860	0.1205	0.1372	0.4694	4.8641	0.0820	1,507.4	0.0056	0.2369

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Operational Entrained Road Dust

Entrained road dust emissions are generated by vehicles traveling on both paved and unpaved roads. These equations are based on the paved and unpaved roads emission factors found in Section 5.3 of Appendix A, CalEEMod Users Guide, version 2016.3.2 and AP-42 Sections 13.2.1 and 13.2.2.

Emission Factors - Paved Roads

EF PM_{10} = $[k * (sL^{0.91}) * (W^{1.02})] * (1 - P/4N)$ = 0.00065 lbs PM_{10}/VMT

EF $PM_{2.5}$ = 0.00016 lbs $PM_{2.5}$/VMT

Constant	Description	Value
k =	PM_{10} particle size multiplier for particle size range and units of interest	0.0022
	$PM_{2.5}$ particle size multiplier for particle size range and units of interest	0.00054
sL =	road surface silt loading in g/m^2 (allowable range is 0.02 to 400 g/m^2)	0.1
W =	average weight of the vehicles traveling the road in tons (mean average fleet vehicle weight ranging from 1.5 - 3 tons)	2.4
P =	number of "wet" days with at least 0.01 in)ches of precipitation during the averaging period	35
N =	number of days in the averaging period (e.g., 365 for annual, 91 for seasonal, 30 for monthly)	365

Emission Factors - Unpaved Roads

EF PM_{10} = $(k * (s/12)^{1} * (S/30)^{0.5} / (M/0.5)^{0.2} - C) * (1 - P/365)$ = 0.7321 lbs PM_{10}/VMT

EF $PM_{2.5}$ = 0.0729 lbs $PM_{2.5}$/VMT

Constant	Description	Value
k =	PM_{10} particle size multiplier for particle size range and units of interest	1.8
	$PM_{2.5}$ particle size multiplier for particle size range and units of interest	0.18
s =	surface material silt content (%) (allowable range 1.8 - 35 %)	4.3
M =	surface moisture content (%) (allowable range 0.03 – 13 %)	0.5
S =	the average vehicle speed (mph) (allowable range [10 - 55 mph])	40
C =	PM_{10} emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear	0.00047
	$PM_{2.5}$ emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear	0.00036
P =	number of "wet" days with at least 0.254 mm (0.01 in) of precipitation during the averaging period *	6

* *Data from Western Regional Climate Center. El Centro Period of Record General Climate Summary - Precipitation. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2713. Accessed January 2020.*

Activity	VMT per day		Emissions in pounds per day							
			Paved Roads		Unpaved Roads		Total Roads		Mitigated	
	Paved	Unpaved	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Raw product to BSR2	3,980	0	2.568	0.630	0.000	0.000	2.568	0.630	1.104	0.271
Shuttle Trucks from BSR2	59	59	0.038	0.009	42.826	4.265	42.864	4.274	18.432	1.838
Processed hay to AAG	114	6	0.074	0.018	4.392	0.437	4.466	0.455	1.920	0.196
Employees	4,128	0	2.663	0.654	0.000	0.000	2.663	0.654	1.145	0.281
TOTAL	***8,281***	***65***	***5.34***	***1.31***	***47.22***	***4.70***	***52.56***	***6.01***	***22.60***	***2.59***

Mitigation of 57% for traffic speed restriction

Note: *Since employees will be using a parking area adjacent to a paved road, all employee trips will be on paved roads. Additionally, all haulers would be on paved roads. Since vendors may travel some on unpaved roads to deliver materials or provide service or product, it was estimated that 5% of vendor travel was assigned to unpaved roads.*

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Old Off-Road Diesel Equipment List

Description	Make - Model	Asset #	BHP	hrs/day	days/ week	hrs/yr
Forklift	Hyster - H80FT	FC-000027	78	10	5	0
Forklift	Hyster - H80FT	FC-000028	78	10	5	0
Forklift	Hyster - H210HD2	FC-000066	155	8	5	0
Forklift	Hyster - H210HD2	FC-000160	155	8	5	0
Forklift w/ Hay Squeeze	Hyster - H210HD2	FC-000001	155	8	5	0
Hyster	Hyster RS 45-31 CH	FC-000192	365	10	3	0
Hyster	Hyster RS 45-31 CH	FC-000577	365	10	3	0
Lift Truck	H80FT	FC-000079	78	10	5	0
Lift Truck	H80FT	FC-000414	59	2	5	0
Loader	JBC - 437	FC-000069	181	10	5	0
Loader	JBC - 437	FC-000183	181	10	5	0
UTV	Kubota - RTV X900	FC-000065	21.6	8	5	0
UTV	Kubota - RTV X900	FC-000078	21.6	8	5	0
UTV	Kubota - RTV X900	FC-000102	21.6	8	5	0
UTV	Kubota SRFTZ-X900	FC-000736	21.6	8	5	0
Water Truck	Kenworth T370 Tractor (2019)	FC-000554	350	12	5	0

Assumptions

Travel Distances

Delivering Hay to Blair Ranch #2

Source of Hay		1-way mileage In County	1-way mileage Total
32.46%	Southern Imperial Valley	35	35
32.46%	Northern Imperial Valley	9	9
9.72%	Yuma AZ	35	88
23.36%	Blythe CA	88	110
2.00%	Poston AZ	78	115
	Average 1-way Mileage	***39.8***	***50.8***

Employees & Miscellaneous

Source		1-way mileage
50%	Brawley	15
50%	El Centro	28
	Average 1-way Mileage	***21.5***

Shuttle Trucks 60 trips/day

Source	1-way mileage
Shuttle from BRS2	1.5

Processed Hay to Long Beach

Source	1-way mileage
BRS1 to AAG	1

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OB-1
AIR ANALYSES

APPENDIX B

Health Risk Assessment

Health Risk Assessment

Blair Ranch Expansion Project

County of Imperial

Lead Agency:

County of Imperial
Planning & Development Services Department
801 Main Street
El Centro, California 92243

Prepared by:

Vista Environmental
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949 510 5355
Greg Tonkovich, AICP

Project No. 16017

January 27, 2020

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ACRONYMS AND ABBREVIATIONS

BACT	Best Available Control Technology
BSFC	Brake Specific Fuel Consumption
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
DPM	Diesel particulate matter
EPA	Environmental Protection Agency
ºF	Fahrenheit
HAP	Hazardous Air Pollutants
ICAPCD	Imperial County Air Pollution Control District
OEHHA	Office of Environmental Health Hazard Assessment
PM	Particle matter
PM10	Particles that are less than 10 micrometers in diameter
PM2.5	Particles that are less than 2.5 micrometers in diameter
PPM	Parts per million
PPB	Parts per billion
PPT	Parts per trillion
TAC	Toxic air contaminants

1.0 INTRODUCTION

1.1 Purpose of Analysis and Study Objectives

This Health Risk Assessment (HRA) has been completed to determine the potential cancer and non-cancer (acute and chronic) risks would exceed state standards from the diesel emission sources associated with the operation of the proposed Blair Ranch Expansion project (proposed project). This analysis has been prepared based on the analysis procedures provided in the *Health Risk Assessments for Proposed Land Use Projects* (CAPCOA Guidelines), prepared by California Air Pollution Control Officers Association (CAPCOA), July 2009 and *Air Toxics Hot Spots Program Risk Assessment Guidelines* (OEHHA Guidelines), prepared by Office of Environmental Health Hazard, February 2015. The following is provided in this report:

- A description of the proposed project;
- A description of toxic air contaminants (TACs);
- A description of the regulatory setting;
- A description of TAC standards or thresholds;
- An analysis of TAC concentrations created from operation of the proposed project; and
- A comparison of the calculated cancer and acute non-cancer risks with the ICAPCD thresholds.

1.2 Site Location and Study Area

Blair Ranch is located in Imperial County at 6456 Blair Road, which is approximately one half mile east of Calipatria City limits at the northeast corner of the intersection of Highway 115 and Blair Road. The 160-acre project site is bounded by Young Road and agricultural uses to the north, agricultural uses to the east, Highway 115 and agricultural uses to the south, and Blair Road and agricultural uses to the west. The project study area is shown in Figure 1.

There is also a separate hay storage yard known as Blair Ranch Site 2 that is located one mile to the north at 6850 Blair Road and has 51 raw product storage barns with a capacity of 76,500 tons, however no changes are proposed as part of the proposed project to the Blair Ranch Site 2 location and no further analysis of the Blair Ranch Site 2 is provided in this Report.

Sensitive Receptors in Project Vicinity

Individuals who are more sensitive to toxic exposures than the general population are considered sensitive receptors. This would include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. Such receptors may reside at hospitals, residences, convalescent facilities, and schools. The nearest sensitive receptor to the project site consist of a farmhouse located approximately 2,500 feet east of the project site and approximately 195 feet north of Highway 115 centerline and single-family homes located as near as 2,700 feet west of the project site and as near as 60 feet south of Highway 115 centerline.

1.3 Proposed Project Description

The existing hay press currently occupies approximately 24 acres of the project site and the remainder of the project site is dedicated to hay storage, administration and ancillary buildings, and infrastructure. The facility has 14 barns used to store raw hay. The barns are located in the northern half of the parcel and can accommodate storage of 21,000 tons of raw product. No new or expanded buildings or infrastructure is proposed as part of the proposed project. The Site Plan is shown in Figure 2.

The facility currently operates six days per week, 16 hours per day but is permitted to operate seven days per week and 24 hours per day. Currently two shifts are operating that includes a day shift from 4:00 a.m. to 3:00 p.m. with 80 employees and a night shift from 3:30 p.m. to 3:00 a.m. with 16 employees. The night shift only operates the press and provide security. The proposed project includes amending the CUP to address the actual number of employees working at the facility.

The facility is currently permitted to store 75,000 tons of unprocessed forage product. The proposed project would increase the permitted storage amount of unprocessed forage product to 110,000 tons, with 1,100 tons processed per day and 400,000 tons processed annually. Currently the facility is entitled for 60 inbound trucks and 50 outbound truck trips per day. The proposed project would result in 100 inbound trucks per day and 60 outbound trucks per day during the peak season of April 31 through August 31. The off-road diesel-powered equipment that is currently operating on the project site is shown in Table A. Table A also shows the brake horsepower, hours per day, days per week and hours per year that each piece of equipment operates.

Table A – Off-Road Diesel-Powered Equipment Operating on the Project Site

Equipment Description	Make – Model	Asset No.	Brake Horsepower	Hours / Day	Days / Week	Hours / Year
Forklift w/ Hay Squeeze	Hyster - H210HD2	FC-000001	155	8	5	2,086
Loader	JBC - 437	FC-000069	181	10	5	2,607
Forklift	Hyster - H80FT	FC-000027	78	10	5	2,607
Forklift	Hyster - H80FT	FC-000028	78	10	5	2,607
UTV	Kubota - RTV X900	FC-000065	21.6	8	5	2,086
Forklift	Hyster - H210HD2	FC-000066	155	8	5	2,086
UTV	Kubota - RTV X900	FC-000078	21.6	8	5	2,086
Lift Truck	H80FT	FC-000079	78	10	5	2,607
UTV	Kubota - RTV X900	FC-000102	21.6	8	5	2,086
Forklift	Hyster - H210HD2	FC-000160	155	8	5	2,086
Loader	JBC - 437	FC-000183	181	10	5	2,607
Rubber Tired Loader	Hyster RS 45-31 CH	FC-000192	365	10	3	1,564
Lift Truck	H80FT	FC-000414	59	2	5	521
Water Truck	Kenworth T370 Tractor (2019)	FC-000554	350	12	5	3,129
Rubber Tired Loader	Hyster RS 45-31 CH	FC-000577	365	10	3	1,564
Tractor	Kubota SRFTZ-X900	FC-000736	21.6	8	5	2,086

Source: Project Applicant.

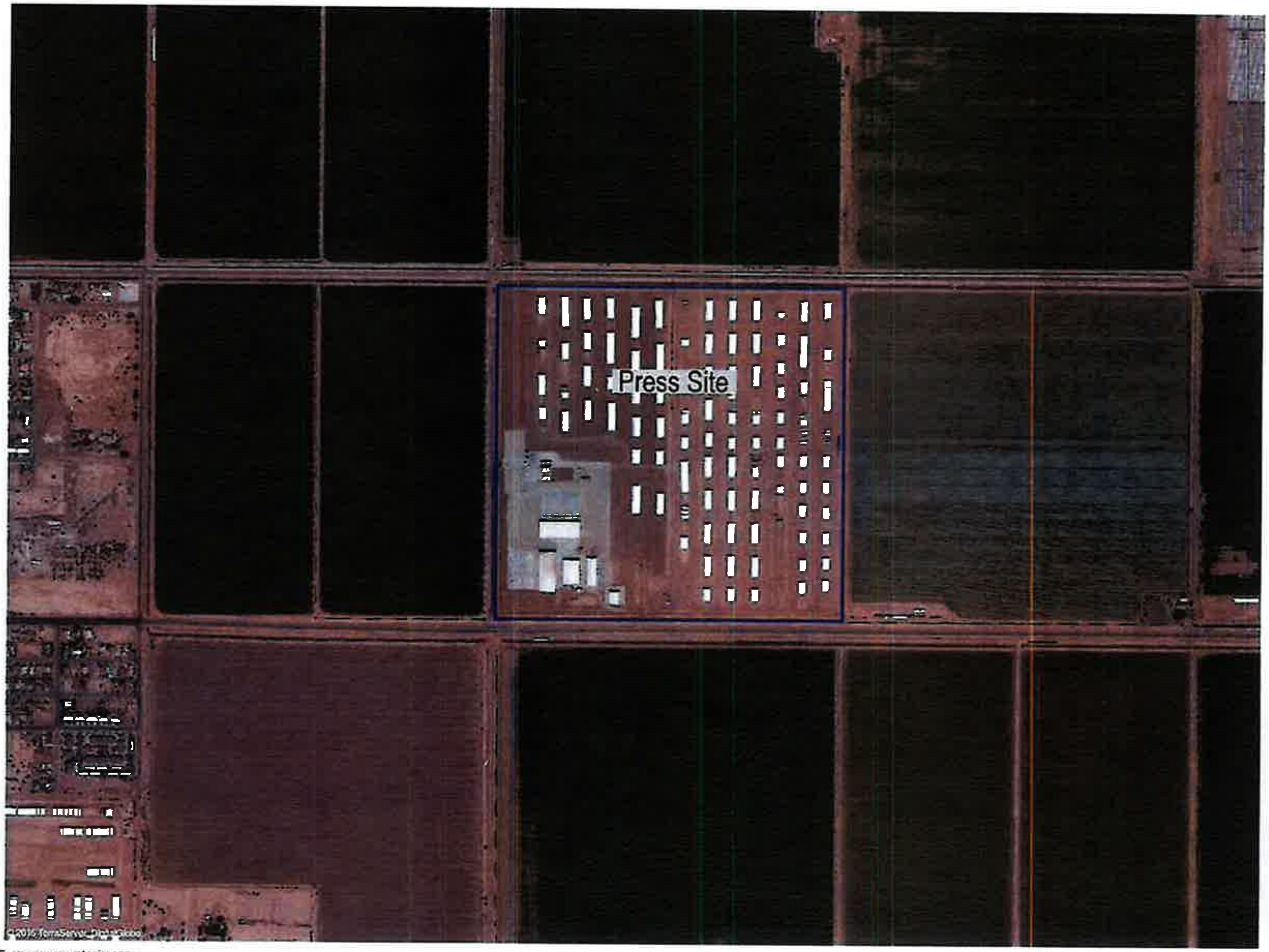
1.4 Project Design Features Incorporated into the Proposed Project

This analysis was based on implementation of the following project design features that have been detailed by the project applicant.

Project Design Feature 1:
The project applicant has stated that all off-road diesel equipment currently meets the U.S. EPA's Tier 4 emissions standards. Project Design Feature 1 commits the project applicant to only using off-road diesel equipment that meets or exceeds Tier 4 emissions standards.

1.5 Mitigation Measures for the Proposed Project

This analysis found that through implementation of the State and ICAPCD TAC emissions reductions regulations as well as implementation of the above Project Design Feature 1, would limit TAC emissions from the proposed project to less than significant levels and no mitigation is required.



SOURCE: TerraServer Aerial

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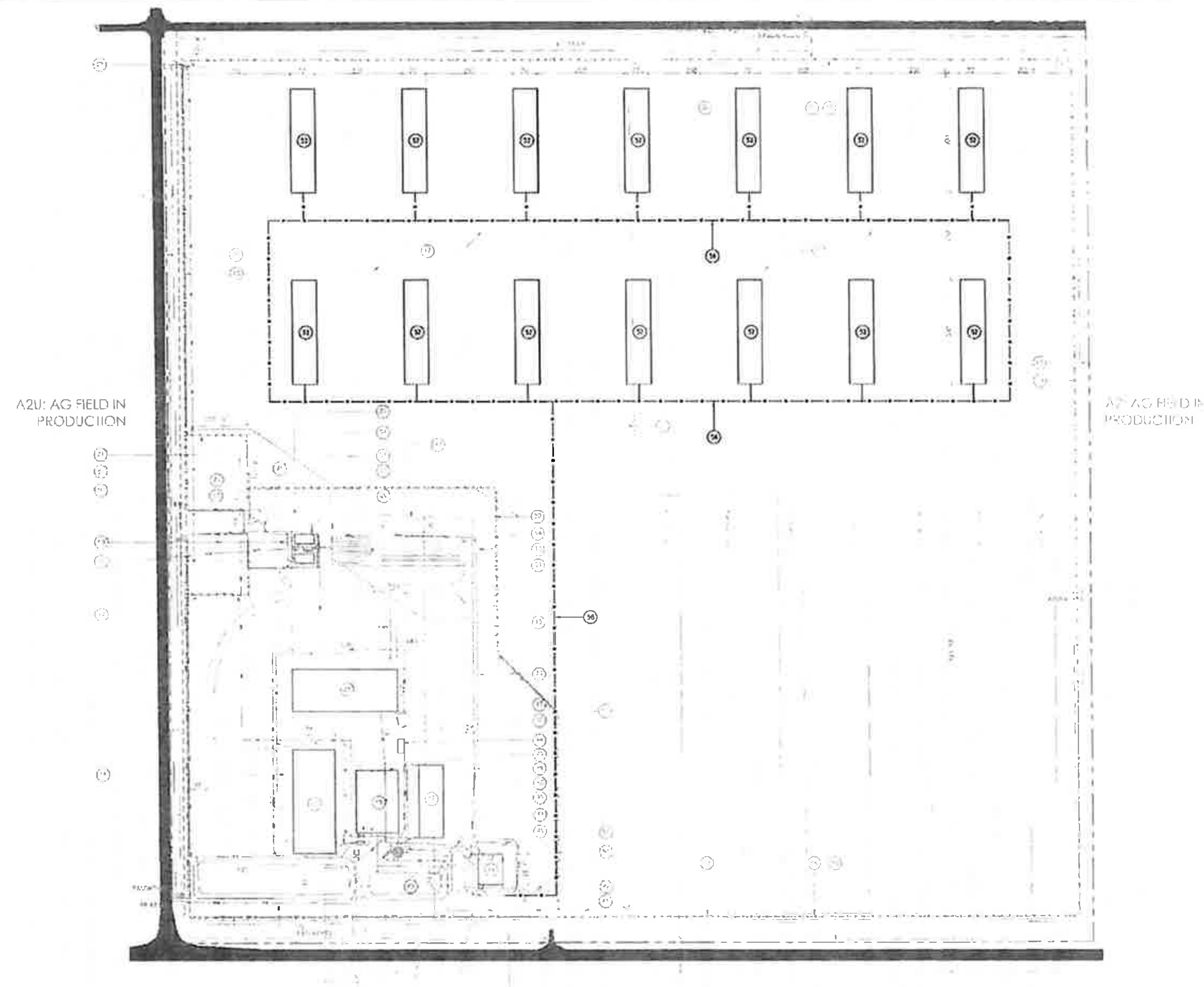
VISTA ENVIRONMENTAL

Figure 1
Project Study Area

EEC ORIGINAL PKG.



SOURCE: R[illegible] Engineerin[illegible]

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VISTA ENVIRONMENTAL

Figure 2
Site Plan

EEC ORIGINAL PKG.

2.0 ATMOSPHERIC SETTING

The project site is located within the central portion of Imperial County, which is part of the Salton Sea Air Basin (Air Basin). The Air Basin is comprised of the central portion of Riverside County and all of Imperial County. The Riverside County portion of the Air Basin is regulated by the South Coast Air Quality Management District (SCAQMD) and the Imperial County portion of the Air Basin is regulated by the Imperial County Air Pollution Control District (ICAPCD).

Air quality is a function of both the rate and location of pollutant emissions under the influence of meteorological conditions and topographical features. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with physical features of the landscape to determine their movement and dispersal, and consequently, their effect on air quality. The combination of topography and inversion layers generally prevents dispersion of air pollutants in the Air Basin. The following description of climate of Imperial County was obtained from *Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter*, prepared by ICAPCD, October 23, 2018.

The climate of Imperial County is governed by the large-scale sinking and warming of air in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The high-pressure ridge blocks out most mid-latitude storms, except in the winter, when it is weakest and located farthest south. The coastal mountains prevent the intrusion of any cool, damp air found in California coastal areas. Because of the barrier and weakened storms, Imperial County experiences clear skies, extremely hot summers, mild winters, and little rainfall. The sun shines, on the average, more in Imperial County than anywhere else in the United States.

Winters are mild and dry with daily average temperatures ranging between 65- and 75-degrees Fahrenheit (°F). During winter months it is not uncommon to record maximum temperatures of up to 80 °F. Summers are extremely hot with daily average temperatures ranging between 104 and 115 °F. It is not uncommon to record maximum temperatures of 120 °F during summer months.

The flat terrain of the valley and the strong temperature differentials created by intense solar heating, produce moderate winds and deep thermal convection. The combination of subsiding air, protective mountains, and distance from the ocean all combine to severely limit precipitation. Rainfall is highly variable with precipitation from a single heavy storm able to exceed the entire annual total during a later drought condition. The average annual rainfall is just over three inches with most of it occurring in late summer or mid-winter.

Humidity is low throughout the year, ranging from an average of 28 percent in summer to 52 percent in winter. The large daily oscillation of temperature produces a corresponding large variation in the relative humidity. Nocturnal humidity rises to 50 to 60 percent but drops to about 10 percent during the day.

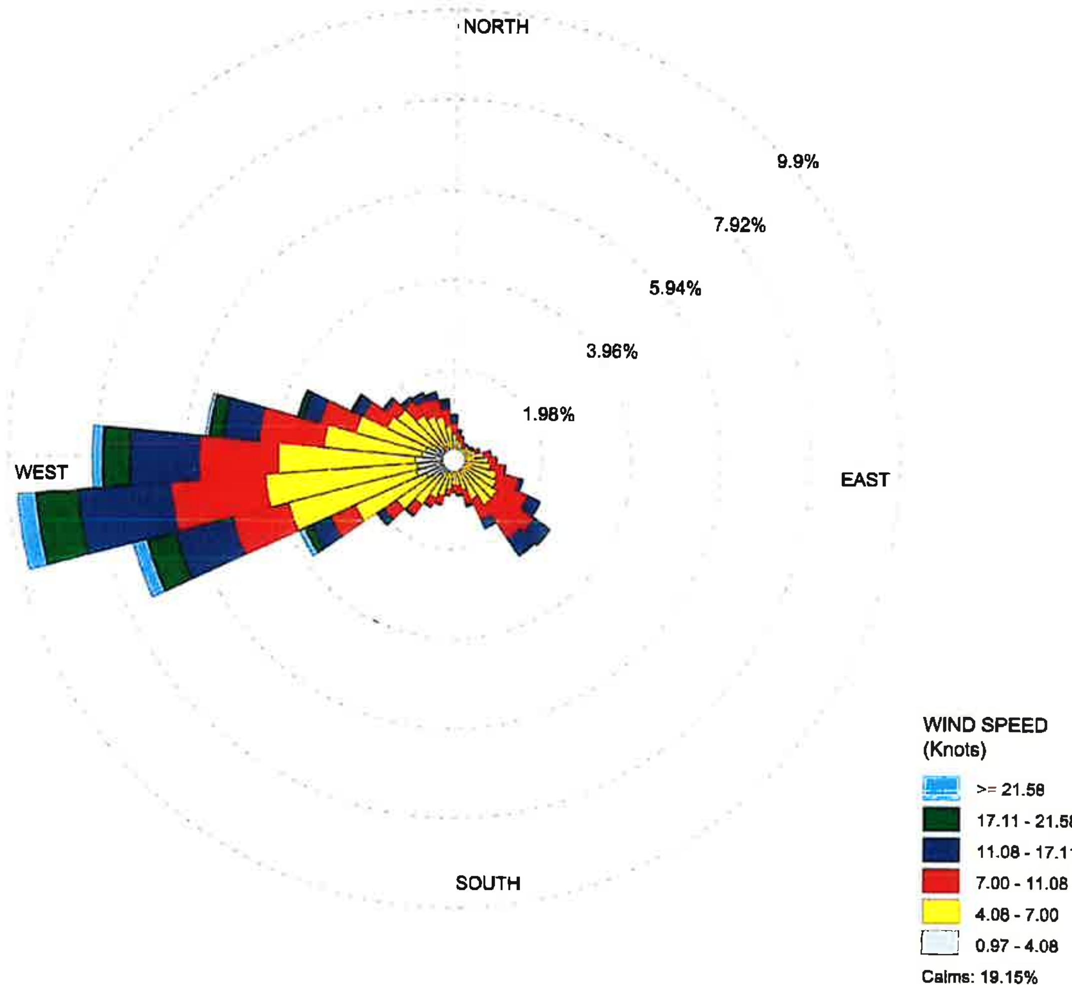
The wind in Imperial County follows two general patterns. Wind statistics indicate prevailing winds are from the west-northwest through southwest; a secondary flow maximum from the southeast is also evident. The prevailing winds from the west and northwest occur seasonally from fall through spring and are known to be from the Los Angeles area. Occasionally, Imperial County experiences periods of extremely high wind speeds. Wind speeds can exceed 31 miles per hour (mph) and this occurs most frequently during the months of April and May. However, speeds of less than 6.8 mph account for more than one-half of the observed wind measurements. The wind rose from Imperial County Airport, which is the nearest monitoring station to the project site is shown in Figure 3.

WIND ROSE PLOT:

Station #3144

DISPLAY:

Wind Speed
Direction (blowing from)



COMMENTS:	DATA PERIOD:	COMPANY NAME:	
	Start Date: 1/1/2009 - 00:00 **End Date: 1/2/2014 - 23:59**	MODELER:	
	CALM WINDS: **19.15%**	TOTAL COUNT: **41831 hrs.**	
	AVG. WIND SPEED: **6.23 Knots**	DATE: **1/27/2020**	PROJECT NO.:

WRPLOT View - Lakes Environmental Software

VISTA ENVIRONMENTAL

Figure 3
Wind Rose from Imperial County Airport

3.0 TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) is a term that is defined under the California Clean Air Act and consists of the same substances that are defined as Hazardous Air Pollutants (HAPs) in the Federal Clean Air Act. There are over 700 hundred different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least 40 different toxic air contaminants. The most important of these TACs, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and acetaldehyde. Public exposure to TACs can result from emissions from normal operations as well as from accidental releases. Health effects of TACs include cancer, birth defects, neurological damage, and death.

3.1 Diesel Particulate Matter

According to *The California Almanac of Emissions and Air Quality 2013 Edition*, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important of which is diesel particulate matter (DPM). DPM is typically considered a subset of PM2.5 because the size of diesel particles are typically 2.5 microns and smaller. The identification of DPM as a TAC in 1998 led the California Air Resources Board (CARB) to adopt the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles in September 2000. The plan's goals are a 75-percent reduction in DPM by 2010 and an 85-percent reduction by 2020 from the 2000 baseline. Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material. The visible emissions in diesel exhaust are known as particulate matter or PM, which includes carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and over 40 other cancer-causing substances. California's identification of DPM as a toxic air contaminant was based on its potential to cause cancer, premature deaths, and other health problems. Exposure to DPM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources. The various pollutants within DPM that also cause acute and chronic health impacts are detailed below in Table B. Table B was developed through crosschecking all diesel emissions pollutants provided in San Diego Air Pollution Control District's (SDAPCD) Diesel Fired Engines Emissions Factor Table to the list of acute and chronic reference exposure levels provided at: http://oehha.ca.gov/air/allrels.html.

According to the California Office of Environmental Health and Hazards Assessment (OEHHA), no acute risk has been found to be directly created from DPM, so there is no Acute Reference Exposure Level (AREL) assigned to DPM. However, as detailed in Table B, other TAC emissions associated with diesel exhaust do have an acute REL assigned to them. In order to account for the acute risk from all TAC emissions associated with diesel emissions, a hypothetical acute REL was calculated for DPM through multiplying each TAC with an acute REL to its diesel weight fraction and then adding together the results, which resulted in a hypothetical acute AREL of 137 for diesel emissions.

Table B – Diesel Emission Pollutants that Cause Acute and Chronic Health Impacts

TAC	TAC Potency Factors (μg/m³)[1] Acute REL[2]	Chronic REL	Percent of DPM Emission Rate[3]	Target Organ Systems
1,3-Butadiene	660	140	0.51%	Development
Acetaldehyde	470	140	1.84%	Eyes, respiratory system (sensory irritation)
Acrolein	2.5	0.35	0.08%	Eyes, respiratory system
Arsenic	0.2	0.015	0.004%	Reproductive/developmental, cardiovascular system, nervous system
Benzene	27	3	0.44%	Hematologic system, immune system, reproductive/developmental
Cadmium	--	0.02	0.004%	kidney, respiratory system
Chlorobenzene	--	1,000	0.0005%	Eyes, respiratory system
Chromium (hexavalent)	--	0.2	0.001%	Respiratory system, hematologic system
Copper	100	--	0.01%	Respiratory system
Ethyl benzene	--	5	0.03%	Liver, kidney, developmental
Formaldehyde	55	9	4.07%	Eyes, immune system, respiratory
Hexane	--	200	0.06%	Nervous system
Hydrogen Chloride	2,100	9	0.44%	Eyes, respiratory system
Manganese	--	0.09	0.01%	Nervous system
Mercury	0.6	0.03	0.005%	Reproductive/developmental
Naphthalene	--	9	0.05%	Respiratory system
Nickel	0.2	002	0.01%	Immune system, respiratory system
Propylene	--	3000	1.10%	Respiratory System
Selenium	--	20	0.01%	Liver, cardiovascular system, nervous system
Toluene	37000	300	0.25%	Nervous system, eyes, respiratory system, reproductive/developmental
Xylene	22000	700	0.10%	Eyes, nervous and respiratory systems
DPM	--	5	--	Respiratory system

Notes:
[1] Potency factors obtained from: http://www.oehha.ca.gov/risk/ChemicalDB/index.asp
[2] REL = Reference Exposure Level
[3] Percentage of DPM Emission Rate calculated by dividing the pollutant's pounds per 1,000 gallons rate by the PM2.5 pounds per 1,000 gallons rate provided by the SDAPCD
Sources: SDAPCD, 2011 and OEHHA, 2014.

Asbestos

Asbestos is listed as a TAC by CARB and as a Hazardous Air Pollutant by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. The nearest likely locations of naturally occurring asbestos, as identified in the *General Location Guide for Ultramafic Rocks in California*, prepared by the California Division of Mines and Geology, is located in Santa Barbara County. The nearest historic asbestos mine to the project site, as identified in the *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*, prepared by U.S. Geological Survey, is located at Asbestos Mountain, which is approximately 65 miles northwest of the project site in the San Jacinto Mountains. Due to the distance to the nearest natural occurrences of asbestos, the project site is not likely to contain asbestos.

3.2 TAC Regulatory Setting

The TACs emissions from the nearby existing uses are addressed through the efforts of various federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to reduce TACs through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving TACs are discussed below.

Federal and State

The United States Environmental Protection Agency (EPA) is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for atmospheric pollutants. There are national standards for six common "criteria" air pollutants including ozone, nitrogen dioxide, carbon monoxide, particulate matter (PM_{10} and $PM_{2.5}$), lead, and sulfur dioxide, which were identified from provisions of the Clean Air Act of 1970. California, under the California Clean Air Act, has also defined a set of health protective California Ambient Air Quality Standards (CAAQS).

Besides the "criteria" air pollutants, there is another group of substances found in ambient air referred as Hazardous Air Pollutants (HAPs) under the Federal Clean Air Act and Toxic Air Contaminants (TACs) under the California Clean Air Act. These contaminants tend to be localized to their sources and are found in relatively low concentrations in ambient air. They are regulated at the federal, state and regional levels, due to their potential of causing adverse health effects from exposure to low concentrations for long periods of time. HAPs are the air contaminants identified by the EPA as known or suspected to cause cancer, serious illness, birth defects, or death. Many of the contaminants originate from human activities, such as fuel combustion and solvent use. Mobile Source Air Toxics (MSATs) are a subset of the 188 identified HAPs. Of the 21 different HAPs that constitute the MSATs, there are six primary HAPs identified that include diesel exhaust, benzene, formaldehyde, acetaldehyde, acrolein, and 1, 3-butadiene. While vehicle miles traveled in the United States is anticipated to increase by 64 percent between 2000 and 2020, emissions of MSATs are anticipated to decrease between 57 and 67 percent as a result of efforts to control mobile source emissions.

The CARB Statewide comprehensive air toxics program was established in the early 1980s. The TAC Identification and Control Act (Assembly Bill 1807, Tanner 1983 [AB 1807]) created California's program to reduce exposure to air toxics. The Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill 2588, Connelly 1987 [AB 2588]) supplements the AB 1807 program by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

AB 1807, requires the CARB to identify and control TACs. In selecting substances, the CARB must consider "the risk of harm to the public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community." AB 1807 also requires the CARB to use available information gathered from the AB 2588 program to include in the prioritization of compounds. In 1992, the Hot Spots Act was amended by Senate Bill 1731, to require facilities that pose a significant health risk to reduce their risk through a risk management plan.

In 2000, the CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled engines and vehicles. The goal of the plan is to reduce PM emissions and the associated health risks by 75 percent by 2010 and 85 percent by 2020. The plan provides a roadmap that identifies steps CARB will be taking to develop specific regulations to reduce diesel particulate matter (DPM) emissions.

As a result of controls on motor vehicles, fuels, stationary sources, and consumer products, the public's exposure to air toxics has decreased dramatically. Between the early 1990's and today, the decrease in statewide average health risk ranged from approximately 20 percent from formaldehyde to approximately 90 for perchlorethylene. 1,3-butadiene and benzene have also seen significant decreases of 80 to 85 percent as a result of CARB's mobile source control program. In addition dioxins have been reduced by 99 percent in that time period, however that is primarily due to CARB's restrictions on medical waste incinerators.

CCR Title 13, Section 2025 - On-Road Diesel Truck Fleets

On December 12, 2008 the CARB adopted Resolution 08-43, which limits NOx, PM10 and PM2.5 emissions from on-road diesel truck fleets that operate in California. On October 12, 2009 Executive Order R-09-010 was adopted that codified Resolution 08-43 into Section 2025, title 13 of the California Code of Regulations. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California shall meet model year 2010 (Tier 4 Final or Tier 4f) or latter emission standards. In the interim period, this regulation provides annual interim targets for fleet owners to meet. By January 1, 2017, 80 percent of a truck fleet is required to have installed Best Available Control Technology (BACT) for NOx emissions and 100 percent of a truck fleet installed BACT for PM10 emissions. This regulation also provides a few exemptions including a delayed implementation rate for truck fleets of three or fewer trucks, exemptions for agricultural trucks that drive less than 1,000 miles per year, and a onetime per year 3-day pass for trucks registered outside of California. All diesel trucks that utilize public roads in California are required to comply with CCR Title 13, Section 2025.

CCR Title 13, Section 2485 - Commercial Vehicle Idling and Auxiliary Power Systems

On October 20, 2005 the CARB approved regulatory measures including the adoption of Title 13, Chapter 9, Article 8, Section 2485 of the California Code of Regulations (CCR) (Section 2485), which regulates idling activities and auxiliary power systems (APS) in commercial vehicle vehicles with a vehicle weight rating of greater than 10,000 pounds. On December 5, 2014, the Office of Administrative Law (OAL) approved new Amendments Section 2485, which became effective on January 1, 2015, and now all APS systems operated in California are required to meet the model year 2007 or newer emissions standards and all new APS systems are required to meet the Tier 4f emission standards and by 2023 all APS systems operating in California will be required to meet the Tier 4f emissions standards. Section 2485 also restricts vehicle idling to no more than five minutes at any one location and restricts the operation of an APS to no more than five minutes in any location within 100 feet of a sensitive receptor.

Imperial County Air Pollution District

The ICAPCD is the agency principally responsible for comprehensive air pollution control for the Imperial County Air Basin (Air Basin). The ICAPCD is responsible for regulating emissions primarily from stationary sources and certain area wide and indirect sources, but has no authority over motor vehicle emissions and other non-stationary sources of TAC emissions. To that end, as a regional agency, the ICAPCD works directly with the county transportation commission and local governments and cooperates actively with all federal and state agencies. The ICAPCD with coordination of the County transportation agency is also responsible for developing the Air Quality Plans for the County. In addition, the ICAPCD has prepared the *CEQA Air Quality Handbook*, adopted in November 2007, which sets forth recommended thresholds of significance, analysis methodologies, and provides guidance on mitigating significant air quality impacts. Section 4.6.a. of the Air Quality Handbook requires that any industrial operations that have the potential to emit TACs, even at very low levels of emissions, are required to prepare a health risk assessment to determine the potential level of risk with the operation.

ICAPCD Rule 207, New and Modified Stationary Source Review, requires that emissions from new or modified emissions sources shall not cause or make worse a violation of an AAQS.

ICAPCD Rule 1101, New Source Performance Standards (NSPS) requires that all new stationary sources of air pollution shall comply with the standards and requirements provided within Rule 1101

4.0 MODELING PARAMETERS AND ASSUMPTIONS

The dispersion modeling utilized for analyzing TAC emissions in this analysis has been based on the recommended methodology described in *Health Risk Assessments for Proposed Land Use Projects* (CAPCOA Guidance), prepared by CCAPCOA, July 2009 and *Air Toxics Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance), prepared by OEHHA, February 2015. Important issues that affect the dispersion modeling include the following: 1) Model Selection, 2) Source Treatment, 3) Meteorological Data, and 4) Receptor Grid. Each of these issues are addressed below.

4.1 Model Selection

Lakes Environmental's AERMOD View Version 9.8.3 was used for all dispersion modeling. Key dispersion modeling options selected included the regulatory default options. According to the OEHHA Guidance, the threshold for utilizing the urban modeling option is 750 people per square kilometer, since there is approximately 90 homes located in the 2.25 square kilometer analysis area and based on a typical occupancy rate of 3 persons per home this would result in 270 people living in the analysis area. Therefore the rural modeling option was chosen. Flagpole receptor height was set to 0 meters. AERMAP was run with a 7.5 minute USGS DEM Maps of: (1) Westmorland East; (2) Wiest; (3) Niland; and (4) Iris.

Meteorological Data

Meteorological data provided by CARB for Imperial County Airport for the time period of January 1, 2009 and January 2, 2014 were selected for this modeling application. CARB processed the data for input into the AERMOD model. The data was obtained at: https://ww3.arb.ca.gov/toxics/harp/metfiles2.htm.

Receptor Grid

The nearest sensitive receptors that may be impacted by the proposed project is a farmhouse located approximately 2,500 feet east of the project site and approximately 195 feet north of Highway 115 centerline and single-family homes located as near as 2,700 feet west of the project site and as near as 60 feet south of Highway 115 centerline. Discrete receptors were placed at the locations of the nearest offsite residential structures and fenceline grid receptors were used out to 750 meters (2,460 feet). Figure 4 shows the locations of the sources and receptors modeled in the AERMOD model.

4.2 TAC Emissions Assumptions

The proposed project is anticipated to generate DPM emissions from on-road vehicle operations and off-road equipment. All emissions are based on the current, year 2020 emissions rates. In order to provide a worst-case analysis, this analysis analyzes the impacts from all DPM emissions created from Blair Ranch and not just the DPM emissions associated with the proposed expansion of Blair Ranch.

Off-Road Diesel Equipment

The OFFROAD2017 Web Database provided at: https://www.arb.ca.gov/orion/ was utilized to calculate the DPM emissions from each piece of equipment that operates on the project site. The OFFROAD2017 model was run for Imperial County for the year 2020. Since the project applicant has stated that all off-road diesel equipment meets the most current Tier 4 standards, that were not fully implemented until the year 2014, the model year 2014 was analyzed in the OFFROAD2017 model. The OFFROAD2017 model only provides a limited number of types of off-road vehicles, as such the most similar types available to the off-road equipment utilized onsite were selected, which include off-highway trucks, rubber tired loaders, tractors/loaders/backhoes, and forklifts. It should be noted that the DPM emission rates for each type of equipment needs to meet the same Tier 4 standards, so an exact match to the equipment used is not required to provide a reasonable estimate of DPM emissions created from each piece of equipment. The applicable emission rates from OFFROAD2017 emissions rates are shown in Table C and Appendix A provides the OFFROAD2017 model printouts.

Table C – OFFROAD2017 DPM (PM2.5) Equipment Emission Rates

Equipment	Total Horsepower Hours-Day per Type of Equipment	Total PM2.5 Tons per Day	DPM Emission Rates (grams per Brake Horsepower-hour)
Off-Highway Trucks	3,117	3.8E-05	0.011
Rubber Tired Loaders	1,799	7.8E-06	0.004
Tractors/Loaders/Backhoes	2,332	1.2E-05	0.005
Forklifts	331	8.2E-07	0.002

Source: OFFROAD2017 Web Database https://www.arb.ca.gov/orion/ (see Appendix A)

The off-road equipment DPM emission rates were calculated by multiplying the OFFROAD2017 emissions rates shown in Table C by the brake horsepower for each piece of equipment, than converting the DPM emissions into grams per second. The calculated DPM emissions from the off-road equipment operating on the project site is shown in Table D.

Table D – Off-Road Diesel-Powered Equipment DPM Emission Rates on the Project Site

Equipment Description	Brake Horsepower	DPM Emission Rates[1] (grams/horsepower-hour)	Equipment DPM Emissions (grams/year)	Equipment DPM Emissions (grams/second)
Forklift w/ Hay Squeeze	155	0.002	722.1	2.29E-05
Loader	181	0.004	1850.4	5.87E-05
Forklift	78	0.002	454.2	1.44E-05
Forklift	78	0.002	454.2	1.44E-05
UTV	21.6	0.005	210.3	6.67E-06
Forklift	155	0.002	722.1	2.29E-05
UTV	21.6	0.005	210.3	6.67E-06
Lift Truck	78	0.011	2254.4	7.15E-05
UTV	21.6	0.005	210.3	6.67E-06
Forklift	155	0.002	722.1	2.29E-05
Loader	181	0.004	1850.4	5.87E-05
Rubber Tired Loader	365	0.004	2238.9	7.10E-05
Lift Truck	59	0.011	341.1	1.08E-05
Water Truck	350	0.011	12139.2	3.85E-04
Rubber Tired Loader	365	0.004	2238.9	7.10E-05
Tractor	21.6	0.005	210.3	6.67E-06
		Combined Equipment DPM Emission Rate		**8.51 E-04**

Notes:
[1] DPM Emissions Rates from EMFAC2017, shown in Table C above.

The off-road equipment was analyzed in the AERMOD model as a 525,600 square meter (130 acre) area source that encompasses the area of the project site where the off-road equipment could potentially operate. The AERMOD emission rates were calculated by converting each pollutant's emissions to grams per second and then dividing by the grams per second by 525,600 square meters, which resulted in an emission rate of 1.62E-09 grams per second per meter that was entered into the AERMOD model. The equipment area source was modeled with a 12 foot release height and a 50-foot initial vertical dimension of the plume in order to account for the vertical velocity of the exhaust leaving the off-road equipment.

On-Road Diesel Truck Emissions

The truck trips generated from the proposed project have been calculated through use of vehicle trip rates provided in *Traffic Impact Analysis Blair Ranch Project* (Traffic Impact Analysis), prepared by Linscott Law and Greenspan, November 8, 2019. The Traffic Impact Analysis found that the proposed project currently generates 220 daily truck trips and with the proposed project would generate 320 daily truck trips.

The truck travel was modeled with line volume sources of Blair Road and Highway 115 within a four square kilometer area as well as a line volume source of the anticipated onsite truck travel. According to the Traffic Impact Analysis, 32 percent of the truck trips will travel on Blair Road north of the project site driveway and 68 percent would travel on Blair Road south of the project site driveway and would continue on Highway 115 to the west.

The emission factors used for the roadway line volume sources was obtained from a model run of EMFAC2017 Model Version 1.0.2 for Imperial County for the year 2020. The diesel trucks were based on the T7 agricultural truck classification. The onsite truck travel was analyzed based on a speed of 15 miles per hour and the travel on Blair Road and Highway 115 were analyzed based on a speed of 45 miles per hour. The EMFAC2017 model run printout is provided in Appendix B. The onsite truck travel emission rates utilized in the AERMOD model were calculated by the following formula:

Emissions (grams/second) = [Emission Rate from EMFAC2017 (grams/mile)] x [length of analyzed roadway (miles)] x [vehicle trips per day] x 1.157E-05 [day/second conversion factor]

Table E provides a summary of the roadway source modeling parameters used for the DPM analysis. All truck travel roadway emissions sources were modeled as line volume sources with a 6 foot height and 12 foot width.

Table E – AERMOD Model Roadway Emissions Sources

Source ID	Description	Daily Vehicle Operations[1]	Vehicle Speed (MPH)	DPM Emissions Rate (grams/second)[2]
RDON	Onsite Road	320	15	1.23E-03
RDBLN	Blair Rd North of Project Driveway	102	45	3.45E-04
RDBLS	Blair Rd South of Project Driveway	218	45	8.14E-04

Notes:
[1] Obtained from Linscott Law & Greenspan, 2019.
[2] Emission rates from EMFAC2017 (see Appendix B).

Onsite Truck Idling

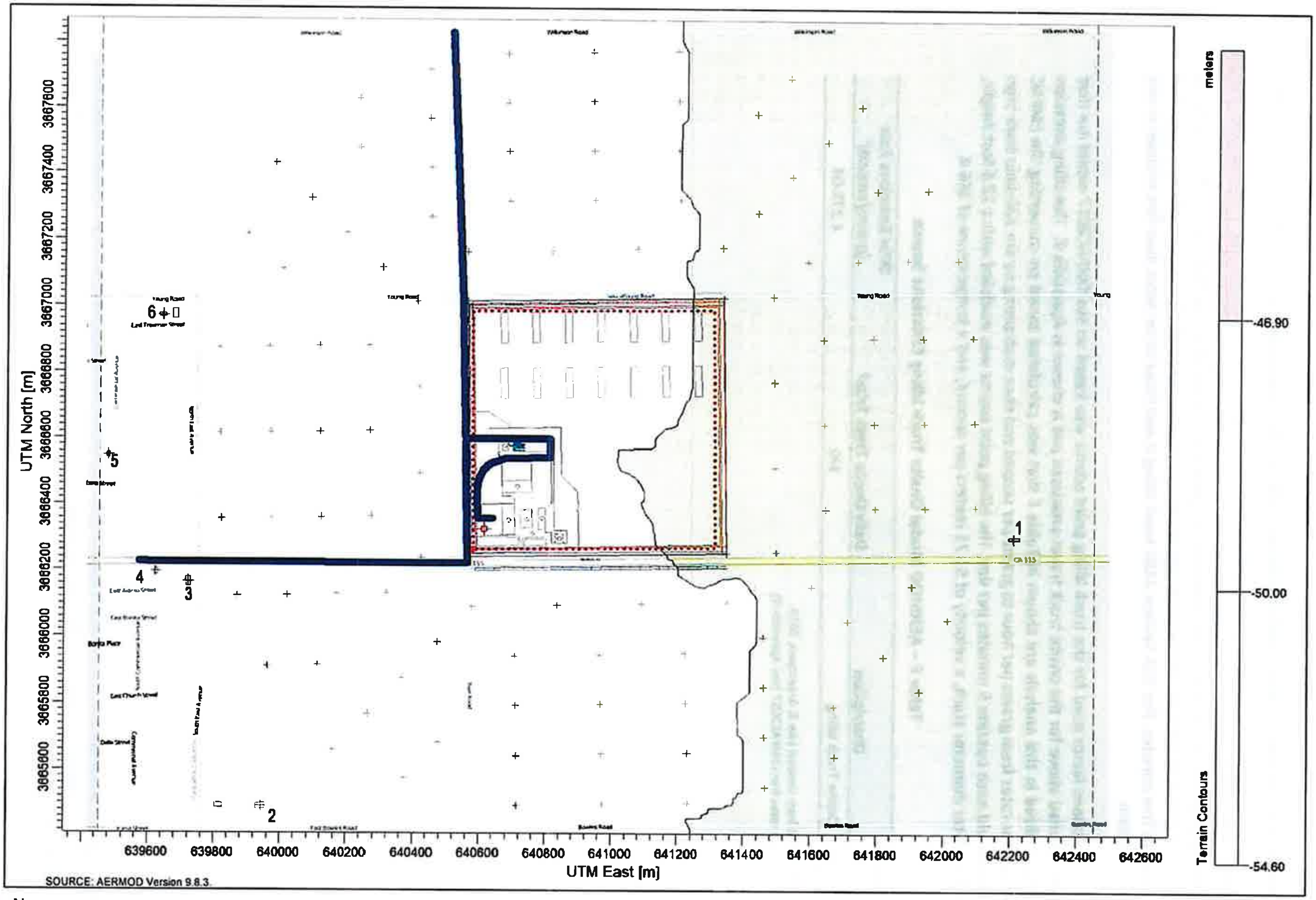
The onsite diesel truck idling was modeled as one point source located at the central area of where trucks are anticipated to operate. The analysis was based on all 320 daily truck trips to or from the project site idling for five minutes. Per CCR Section 2485 truck idling is restricted to no more than five minutes at any one location.

The emissions factor used for the truck idling point source was based on the EMFAC2017 model run that was detailed above for the onsite truck travel emissions and is shown in Appendix B. The idling emission rates utilized in this analysis are shown in Table F that was calculated based on converting the EMFAC emissions rates from grams per hour to grams per second and then multiplying by the 320 daily truck trips that would each operate 5 minutes per day. The idling point source was modeled with a 12.6 foot height, a 0.1 meter diameter stack, a velocity of 51.71 meters per second, and a temperature of 366 K.

Table F – AERMOD Model Onsite Truck Idling Emissions Source

Source ID	Description	Daily Onsite Truck Trips[1]	DPM Emissions Rate (grams/second)[2]
IDLE	Onsite Truck Idling	320	4.27E-04

Notes:
[1] Obtained from Linscott Law & Greenspan, 2019.
[2] Emission rates from EMFAC2017 (see Appendix B).



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VISTA ENVIRONMENTAL

Figure 4
Air Dispersion Model Emission Sources and Receptor Locations

EEC ORIGINAL PKG.

5.0 HEALTH RISK STANDARDS

Any project with the potential to expose sensitive receptors or the general public to substantial levels of TACs would be deemed to have a potentially significant impact. A health risk is the probability that exposure to a TAC under a given set of conditions will result in an adverse health effect. The health risk is affected by several factors, such as the amount, toxicity, and concentration of the contaminant; meteorological conditions; distance from the emission sources to people; the distance between emission sources; the age, health, and lifestyle of the people living or working at a location; and the length of exposure to the toxic air contaminant.

The term "risk" usually refers to the chance of contracting cancer as a result of an exposure, and it is expressed as a probability: chances-in-a-million. The values expressed for cancer risk do not predict actual cases that will result from exposure to toxic air contaminants. Rather, they state a probability of contracting cancer over and above the background level and over a given exposure to toxic air contaminants.

Since the ICAPCD has not adopted a quantitative health risk significance threshold for TAC emissions, the thresholds provided in the CAPCOA Guidelines have been utilized. According to the CAPCOA Guidelines, any project that has the potential to expose the public to TACs in excess of the following threshold would be considered to result in a significant impact:

- If the Maximum Exposed Individual Cancer Risk from carcinogens equals or exceeds 10 in one million persons;
- If the Maximum Exposed Individual Acute Hazard Index from non-carcinogens equals or exceeds 1.0; or
- If the Maximum Exposed Individual Chronic Hazard Index from non-carcinogens equals or exceeds 1.0.

6.0 PROJECT IMPACTS

Health risks from TACs are twofold. First, TACs are carcinogens according to the State of California. Second, short-term acute and long-term chronic exposure to TACs can cause health effects to the respiratory system. Each of these health risks is discussed below.

6.1 Cancer Risk from DPM Emissions

According to the OEHHA Guidance (OEHHA, 2015), the cancer risk should be calculated using the following formula:

Cancer Risk = [Dose-inh (mg/(Kg-day)] * [Cancer Potency Factor (kg-day)/mg]*[$1x10^6$] * Age Sensitivity Factor * Fraction of Time at Home

Dose-inh = (C_{air} * DBR * A * EF * ED * 10^6) / AT

Where:

C_{air}	[Concentration in air (µg/m³)] = (Calculated by AERMOD Model)
DBR	[Daily breathing rate (L/kg body weight – day)]
A	[Inhalation absorption factor]
EF	[Exposure frequency (days/year)]
ED	[Exposure duration (years)]
10^6	[Micrograms to milligrams conversion]
AT	[Average time period over which exposure is averaged in days]

The cancer risk parameters used in this evaluation for the nearby residential uses are shown in Table G.

Table G – Cancer Risk Parameters for Nearby Residents

Parameter	3rd Trimester to 2 years	2 years to 16 years	16 years to 30 years
Cancer Potency Factor (mg/kg-day) for DPM	1.1	1.1	1.1
Daily Breathing Rate[1] (L/kg body weight-day)	867	572	261
Inhalation Absorption Factor	1	1	1
Exposure Frequency (days/year)	350	350	350
Exposure Duration (years)	2.25	14	13.75
Age Sensitivity Factor	10	3	1
Fraction of Time at Home	0.85	0.72	0.73
Averaging Time[2] (days)	25,550	25,550	25,550
Potential Cancer Risk =	C_{air} * 250	C_{air} * 261	C_{air} * 39.5

Notes:
[1] Based on 90th percentile breathing rate for 3rd trimester to 2 years and 80th percentile for all other ages (OEHHA, 2015).
[2] Based on a 70-year average lifetime (OEHHA, 2015)

The OEHHA guidance recommends that Age Sensitivity Factors be utilized for residential receptors, which includes a 10-fold multiplier to infants (3rd trimester to age 2), a 3-fold increase in exposure for children (ages 2 to 16 years old), and an exposure factor of 1 for ages 16 and older. The OEHHA guidance also recommends utilizing the 90th percentile breathing rates for the 3rd trimester to 2 years and the 80th percentile breathing rates for all older persons. The 90th percentile breathing rates for 3rd trimester is 333 and for 0 to 2 years is 934. In order to simplify the analysis, the 3rd trimester and 0 to 2 year breathing rates were time-weighted averaged together, which resulted in a breathing rate of 867. The 80th percentile breathing rate for 2 to 16 years is 572 and for 16 to 30 years is 261.

As shown above in Table G, the potential cancer risk for residential receptors equates to C_{air} * 250 for 3rd trimester to age 2, C_{air} * 261 for ages 2 to 16, and C_{air} * 39.5 for ages 16 to 29.75. Table H provides a summary of the maximum calculated DPM concentrations at each nearby sensitive receptor as well as the coordinates of the receptor where the maximum DPM concentration was measured for each nearby sensitive receptor. Table H also shows the calculated cancer risk based on whether it the receptor is located at either a nearby residential or school use, which have been based on the parameters detailed above in Table G. The AERMOD model run printouts are provided in Appendix C.

Table H – DPM Concentrations and Cancer Risks at Nearby Homes

Sensitive Receiver	Receptor Description	Receptor Location[1] X	Receptor Location[1] Y	Annual DPM Concentration ($\mu g/m^3$)	Cancer Risk Per Million People[2]
1	East of Project Site	642,210	3,666,302	0.0062	3.4
2	Southwest of Project Site	639,942	3,665,492	0.0009	0.5
3	West of Project Site	639,720	3,666,166	0.0119	6.5
4	West of Project Site	639,622	3,666,195	0.0171	9.4
5	West of Project Site	639,479	3,666,549	0.0033	1.8
6	Northwest of Project Site	639,643	3,666,970	0.0032	1.7
				Threshold of Significance	**10**
				Exceed Threshold?	**No**

Notes:
[1] Receptor location based on World Geodetic System 1984 (WGS84), Universal Transverse Mercator (UTM).
[2] The residential cancer risk based on: C_{air} * 250 for 3rd trimester to age 2 (2.25 years), C_{air} * 261 for ages 2 to 16 (14 years), and C_{air} * 39.5 for ages 16 to 29.75 (13.75 years).
Source: Calculated from ISC-AERMOD View Version 9.8.3.

Table H shows the highest concentration of DPM created from the proposed project is 0.0171 µg per cubic meter and would occur at Sensitive Receptor 4, which represents the single family homes located west of the project site, on the south side of Highway 115, west of Southeast Avenue. Sensitive Receptor 4 was found to result in a cancer risk increase of 9.4 per million people. All DPM emissions concentrations at the nearby sensitive receptors were found to be below the 10.0 in a million cancer risk threshold that has been discussed above in Section 5.0. Therefore, a less than significant cancer risk would occur from DPM emissions created from the operation of the proposed project.

6.2 Non-Cancer Risks from DPM Emissions

In addition to the cancer risk from exposure to TAC emissions there is also the potential TAC exposure may result in adverse health impacts from acute and chronic illnesses, which are detailed below.

Chronic Health Impacts

Chronic health effects are characterized by prolonged or repeated exposure to a TAC over many days, months, or years. Symptoms from chronic health impacts may not be immediately apparent and are often irreversible. The chronic hazard index is based on the most impacted sensitive receptor from the proposed project and is calculated from the annual average concentrations of DPM. The relationship for non-cancer chronic health effects is given by the equation:

$$HI_{DPM} = C_{DPM} / REL_{DPM}$$

Where,

HI_{DPM}	=	Hazard Index; an expression of the potential for non-cancer health effects.
C_{DPM}	=	Annual average diesel particulate matter concentration in μg/m³.
REL_{DPM}	=	Reference Exposure Level (REL) for diesel particulate matter; the diesel particulate matter concentration at which no adverse health effects are anticipated.

The REL_{DPM} is 5 $\mu g/m^3$. The Office of Environmental Health Hazard Assessment as protective for the respiratory system has established this concentration. As shown above in Table H shows that the AERMOD model found that the highest annual DPM concentration of 0.0171 $\mu g/m^3$ for DPM chronic non-cancer risk emissions. The resulting Hazard Index is:

$$HI_{DPM} = 0.0171 / 5 = 0.00342$$

The criterion for significance is a Chronic Hazard Index increase of 1.0 or greater, which is detailed above in Section 5.0. Therefore, the non-cancer chronic health risks from construction of the proposed project to the nearby sensitive receptors would be less than significant.

Acute Health Impacts

Acute health effects are characterized by sudden and severe exposure and rapid absorption of a TAC. Normally, a single large exposure is involved. Acute health effects are often treatable and reversible. The acute hazard index is calculated from the maximum 1-hour concentrations of DPM at the point of maximum impact (PMI), which has been calculated with the AERMOD model (see Appendix C). The relationship for non-cancer acute health effects is given by the equation:

$$AHI = C / AREL$$

Where,

AHI	=	Acute Hazard Index; an expression of the potential for non-cancer health effects.
C	=	Maximum hourly concentration of either PM2.5 in μg/m³.
AREL	=	Acute Reference Exposure Level.

No acute risk has been found to be directly created from DPM, so there is no AREL assigned to DPM, however in order to provide an DPM equivalent AREL, the ARELs from all of the other TACs that are emitted in diesel exhaust were added together based on their diesel weighting shown above in Table B. This resulted in a diesel emission weighted equivalent AREL of 137 $\mu g/m^3$. The AERMOD model found that the highest 1-hour concentration at the PMI is 5.06 $\mu g/m^3$ for DPM equivalent acute non-cancer risk emissions. The resulting Hazard Index is:

$$AHI = 5.06 / 137 = 0.0369$$

The criterion for significance is an Acute Hazard Index increase of 1.0 or greater, which is detailed above in Section 5.0. Therefore, the non-cancer acute health risks from construction of the proposed project to the nearby sensitive receptors would be less than significant.

As such, DPM emissions created from the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

7.0 REFERENCES

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Imperial County Air Pollution Control District *Imperial County 2018 Redesignation Request and Maintenance Plan for Particulate Matter less than 10 Microns in Diameter*, October 23, 2018.

Imperial County Air Pollution Control District, *CEQA Air Quality Handbook*, November 2007.

Imperial County Air Pollution Control District, *Rule 1101 New Source Performance Standards (NSPS)*, Adopted September 14, 1999.

Linscott, Law & Greenspan, *Traffic Impact Analysis Blair Ranch Project*, November 8, 2019.

Office of Environmental Health Hazard Assessment (OEHHA), *Air Toxics Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments*, February 2015

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APPENDIX A

OFFROAD2017 Model Printouts

OFFROAD2017 (v1.0.1) Emissions Inventory

Region Type: County

Region: Imperial

Calendar Year: 2020

Scenario: All Adopted Rules - Exhaust

Vehicle Classification: OFFROAD2017 Equipment Types

Units: Emissions: tons/day, Fuel Consumption: gallons/year, Activity: hours/year, HP-Hours: HP-hours/year

Region	CalYr	VehClass	MdlYr	HP_Bin	Fuel	PM2_5_ tpd	Fuel_ gpy	Total_ Activity_h	Total_ Population	Horsepower_ Hours_hhpy
Imperial	2020	ConstMin - Off-Highway Trucks	2014	Aggregatec	Diesel	3.809E-05	22399.8	2648.13	1.8290	1137598.682
Imperial	2020	ConstMin - Rubber Tired Loaders	2014	Aggregatec	Diesel	7.777E-06	12261.5	3353.69	3.4314	656699.8373
Imperial	2020	ConstMin - Tractors/Loaders/Backhoes	2014	Aggregatec	Diesel	1.2E-05	16347.1	9124.76	13.6050	851275.8553
Imperial	2020	Industrial - Forklifts	2014	Aggregatec	Diesel	8.159E-07	1263.14	1308.95	1.7019	120949.775

	Hours-day	**Tons Per Day PM2.5**	**Grams per Brake Horse-Power Hour PM2.5**
ConstMin - Off-Highway Trucks	3,117	3.8E-05	0.011
ConstMin - Rubber Tired Loaders	1,799	7.8E-06	0.004
ConstMin - Tractors/Loaders/Backhoes	2,332	1.2E-05	0.005
Industrial - Forklifts	331	8.2E-07	0.002

EEC ORIGINAL PKG.

APPENDIX B

EMFAC2017 Model Printouts

EMFAC2017 version 1.0.2

calendar_	season_	sub_area	vehicle_cla	fuel	temperatu	relative_h	process	speed_t	pollutant	emission_rate
2020	Annual	Imperial (SS)	T7 Ag	Dsl	72	30	RUNEX	15	PM2_5	0.75868
2020	Annual	Imperial (SS)	T7 Ag	Dsl	72	30	RUNEX	45	PM2_5	0.381682
2020	Annual	Imperial (SS)	T7 Ag	Dsl			IDLEX		PM2_5	1.382022
2020	Annual	Imperial (SS)	T7 Ag	Dsl			PMTW		PM2_5	0.009
2020	Annual	Imperial (SS)	T7 Ag	Dsl			PMBW		PM2_5	0.02646

APPENDIX C

AERMOD Model DPM Printouts

```
**
****************************************
**
** AERMOD Input Produced by:
** AERMOD View Ver. 9.8.3
** Lakes Environmental Software Inc.
** Date: 1/26/2020
** File: C:\Vista Env\2016\16017 Imperial Co\AERMOD2020\Cancer\Cancer.ADI
**
****************************************
**
**
****************************************
** AERMOD Control Pathway
****************************************
**
**
CO STARTING
   TITLEONE Blair Ranch Hay Processing Expansion Project - DPM Calculations
   TITLETWO PM2.5 DPM Exhaust
   MODELOPT DFAULT CONC
   AVERTIME 24 ANNUAL
   POLLUTID PM_2.5
   RUNORNOT RUN
   ERRORFIL Cancer.err
CO FINISHED
**
****************************************
** AERMOD Source Pathway
****************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** ------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDON
** DESCRSRC Road On-Site
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 0.00123
** Vertical Dimension = 1.83
** SZINIT = 0.85
** Nodes = 12
** 640637.769, 3666359.842, -50.64, 3.66, 1.70
** 640594.815, 3666360.402, -51.03, 3.66, 1.70
** 640592.030, 3666443.363, -51.21, 3.66, 1.70
** 640595.987, 3666471.507, -51.21, 3.66, 1.70
** 640607.946, 3666500.484, -51.21, 3.66, 1.70
** 640621.302, 3666515.548, -51.21, 3.66, 1.70
** 640632.781, 3666525.613, -51.21, 3.66, 1.70
** 640679.410, 3666542.004, -51.21, 3.66, 1.70
** 640814.064, 3666543.462, -50.90, 3.66, 1.70
** 640813.747, 3666599.064, -50.90, 3.66, 1.70
** 640701.276, 3666600.706, -51.15, 3.66, 1.70
** 640569.011, 3666599.652, -51.21, 3.66, 1.70
** ------------------------------------------------------------------
   LOCATION L0012898     VOLUME   640635.940 3666359.866 -50.72
   LOCATION L0012899     VOLUME   640632.283 3666359.913 -50.74
   LOCATION L0012900     VOLUME   640628.625 3666359.961 -50.77
   LOCATION L0012901     VOLUME   640624.968 3666360.009 -50.81
```

EEC ORIGINAL PKG.

LOCATION	L0012902	VOLUME	640621.311	3666360.056	-50.84
LOCATION	L0012903	VOLUME	640617.653	3666360.104	-50.88
LOCATION	L0012904	VOLUME	640613.996	3666360.152	-50.92
LOCATION	L0012905	VOLUME	640610.339	3666360.200	-50.96
LOCATION	L0012906	VOLUME	640606.682	3666360.247	-50.99
LOCATION	L0012907	VOLUME	640603.024	3666360.295	-51.03
LOCATION	L0012908	VOLUME	640599.367	3666360.343	-51.06
LOCATION	L0012909	VOLUME	640595.710	3666360.391	-51.06
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LOCATION	L0012912	VOLUME	640594.477	3666370.475	-51.16
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LOCATION	L0012914	VOLUME	640594.232	3666377.786	-51.21
LOCATION	L0012915	VOLUME	640594.109	3666381.442	-51.21
LOCATION	L0012916	VOLUME	640593.986	3666385.097	-51.21
LOCATION	L0012917	VOLUME	640593.863	3666388.753	-51.21
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LOCATION	L0012923	VOLUME	640593.127	3666410.686	-51.21
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LOCATION	L0012925	VOLUME	640592.882	3666417.997	-51.21
LOCATION	L0012926	VOLUME	640592.759	3666421.652	-51.21
LOCATION	L0012927	VOLUME	640592.636	3666425.308	-51.21
LOCATION	L0012928	VOLUME	640592.513	3666428.964	-51.21
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LOCATION	L0012931	VOLUME	640592.145	3666439.930	-51.21
LOCATION	L0012932	VOLUME	640592.061	3666443.584	-51.21
LOCATION	L0012933	VOLUME	640592.570	3666447.206	-51.21
LOCATION	L0012934	VOLUME	640593.079	3666450.828	-51.21
LOCATION	L0012935	VOLUME	640593.589	3666454.450	-51.21
LOCATION	L0012936	VOLUME	640594.098	3666458.072	-51.21
LOCATION	L0012937	VOLUME	640594.607	3666461.694	-51.21
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LOCATION	L0012939	VOLUME	640595.626	3666468.937	-51.21
LOCATION	L0012940	VOLUME	640596.392	3666472.489	-51.21
LOCATION	L0012941	VOLUME	640597.788	3666475.870	-51.21
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LOCATION	L0012945	VOLUME	640603.369	3666489.394	-51.21
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LOCATION	L0012947	VOLUME	640606.160	3666496.156	-51.21
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LOCATION	L0012957	VOLUME	640630.146	3666523.302	-51.21
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LOCATION	L0012968	VOLUME	640667.432	3666537.793	-51.17
LOCATION	L0012969	VOLUME	640670.882	3666539.006	-51.15
LOCATION	L0012970	VOLUME	640674.333	3666540.219	-51.14
LOCATION	L0012971	VOLUME	640677.783	3666541.432	-51.13
LOCATION	L0012972	VOLUME	640681.343	3666542.025	-51.11
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LOCATION	L0012974	VOLUME	640688.658	3666542.104	-51.08
LOCATION	L0012975	VOLUME	640692.316	3666542.144	-51.07
LOCATION	L0012976	VOLUME	640695.973	3666542.183	-51.04
LOCATION	L0012977	VOLUME	640699.630	3666542.223	-51.02
LOCATION	L0012978	VOLUME	640703.288	3666542.262	-51.00
LOCATION	L0012979	VOLUME	640706.945	3666542.302	-50.98
LOCATION	L0012980	VOLUME	640710.602	3666542.342	-50.96
LOCATION	L0012981	VOLUME	640714.260	3666542.381	-50.94
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LOCATION	L0012983	VOLUME	640721.575	3666542.461	-50.90
LOCATION	L0012984	VOLUME	640725.232	3666542.500	-50.90
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LOCATION	L0012992	VOLUME	640754.491	3666542.817	-50.90
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LOCATION	L0012994	VOLUME	640761.806	3666542.896	-50.90
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LOCATION	L0012998	VOLUME	640776.435	3666543.055	-50.90
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LOCATION	L0013000	VOLUME	640783.750	3666543.134	-50.90
LOCATION	L0013001	VOLUME	640787.408	3666543.174	-50.90
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LOCATION	L0013019	VOLUME	640813.841	3666582.641	-50.90
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LOCATION	L0013021	VOLUME	640813.799	3666589.956	-50.90
LOCATION	L0013022	VOLUME	640813.778	3666593.614	-50.90
LOCATION	L0013023	VOLUME	640813.757	3666597.271	-50.90
LOCATION	L0013024	VOLUME	640811.882	3666599.091	-50.90
LOCATION	L0013025	VOLUME	640808.225	3666599.144	-50.90
LOCATION	L0013026	VOLUME	640804.568	3666599.198	-50.90
LOCATION	L0013027	VOLUME	640800.911	3666599.251	-50.90

LOCATION	L0013028	VOLUME	640797.254	3666599.305	-50.90
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LOCATION	L0013034	VOLUME	640775.310	3666599.625	-50.90
LOCATION	L0013035	VOLUME	640771.653	3666599.678	-50.90
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LOCATION	L0013037	VOLUME	640764.339	3666599.785	-50.90
LOCATION	L0013038	VOLUME	640760.681	3666599.839	-50.90
LOCATION	L0013039	VOLUME	640757.024	3666599.892	-50.90
LOCATION	L0013040	VOLUME	640753.367	3666599.945	-50.90
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LOCATION	L0013042	VOLUME	640746.053	3666600.052	-50.90
LOCATION	L0013043	VOLUME	640742.395	3666600.105	-50.90
LOCATION	L0013044	VOLUME	640738.738	3666600.159	-50.90
LOCATION	L0013045	VOLUME	640735.081	3666600.212	-50.90
LOCATION	L0013046	VOLUME	640731.424	3666600.266	-50.90
LOCATION	L0013047	VOLUME	640727.767	3666600.319	-50.90
LOCATION	L0013048	VOLUME	640724.109	3666600.372	-50.90
LOCATION	L0013049	VOLUME	640720.452	3666600.426	-50.90
LOCATION	L0013050	VOLUME	640716.795	3666600.479	-50.94
LOCATION	L0013051	VOLUME	640713.138	3666600.533	-50.98
LOCATION	L0013052	VOLUME	640709.481	3666600.586	-51.01
LOCATION	L0013053	VOLUME	640705.823	3666600.639	-51.05
LOCATION	L0013054	VOLUME	640702.166	3666600.693	-51.09
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LOCATION	L0013056	VOLUME	640694.851	3666600.655	-51.16
LOCATION	L0013057	VOLUME	640691.194	3666600.625	-51.20
LOCATION	L0013058	VOLUME	640687.536	3666600.596	-51.21
LOCATION	L0013059	VOLUME	640683.879	3666600.567	-51.21
LOCATION	L0013060	VOLUME	640680.221	3666600.538	-51.21
LOCATION	L0013061	VOLUME	640676.564	3666600.509	-51.21
LOCATION	L0013062	VOLUME	640672.906	3666600.480	-51.21
LOCATION	L0013063	VOLUME	640669.249	3666600.451	-51.21
LOCATION	L0013064	VOLUME	640665.591	3666600.421	-51.21
LOCATION	L0013065	VOLUME	640661.934	3666600.392	-51.21
LOCATION	L0013066	VOLUME	640658.276	3666600.363	-51.21
LOCATION	L0013067	VOLUME	640654.619	3666600.334	-51.21
LOCATION	L0013068	VOLUME	640650.961	3666600.305	-51.21
LOCATION	L0013069	VOLUME	640647.304	3666600.276	-51.21
LOCATION	L0013070	VOLUME	640643.646	3666600.246	-51.21
LOCATION	L0013071	VOLUME	640639.989	3666600.217	-51.21
LOCATION	L0013072	VOLUME	640636.331	3666600.188	-51.21
LOCATION	L0013073	VOLUME	640632.674	3666600.159	-51.21
LOCATION	L0013074	VOLUME	640629.016	3666600.130	-51.21
LOCATION	L0013075	VOLUME	640625.359	3666600.101	-51.21
LOCATION	L0013076	VOLUME	640621.702	3666600.072	-51.21
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LOCATION	L0013084	VOLUME	640592.442	3666599.838	-51.21
LOCATION	L0013085	VOLUME	640588.784	3666599.809	-51.21
LOCATION	L0013086	VOLUME	640585.127	3666599.780	-51.21
LOCATION	L0013087	VOLUME	640581.469	3666599.751	-51.21
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** DESCRSRC Truck Idling
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = RDBLN
** DESCRSRC Total Blair Road North of Project Driveway
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 0.000345
** Vertical Dimension = 1.83
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** Nodes = 3
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** DESCRSRC Total Blair Rd South of Project Driveway
** PREFIX
** Length of Side = 3.66
** Configuration = Adjacent
** Emission Rate = 0.000814
** Vertical Dimension = 1.83
** SZINIT = 0.85
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SRCPARAM	L0013734	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013735	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013736	0.000002188	0.00	1.70	0.85
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SRCPARAM	L0013739	0.000002188	0.00	1.70	0.85
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SRCPARAM	L0013742	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013743	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013744	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013745	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013746	0.000002188	0.00	1.70	0.85
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SRCPARAM	L0013748	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013749	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013750	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013751	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013752	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013753	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013754	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013755	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013756	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013757	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013758	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013759	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013760	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013761	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013762	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013763	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013764	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013765	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013766	0.000002188	0.00	1.70	0.85
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SRCPARAM	L0013768	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013769	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013770	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013771	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013772	0.000002188	0.00	1.70	0.85
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SRCPARAM	L0013774	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013775	0.000002188	0.00	1.70	0.85
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SRCPARAM	L0013777	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013778	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013779	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013780	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013781	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013782	0.000002188	0.00	1.70	0.85
SRCPARAM	L0013783	0.000002188	0.00	1.70	0.85

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   SRCPARAM L0013784      0.000002188        0.00       1.70       0.85
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   SRCPARAM L0013786      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013787      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013788      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013789      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013790      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013791      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013792      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013793      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013794      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013795      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013796      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013797      0.000002188        0.00       1.70       0.85
   SRCPARAM L0013798      0.000002188        0.00       1.70       0.85
** --------------------------------------------------------------------
   SRCPARAM EQUIP          1.62E-09      3.658   730.000   720.000    -0.451    15.240

** Variable Emissions Type: "By Hour / Day (HRDOW)"
** Variable Emission Scenario: "Scenario 2"
** WeekDays:
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   EMISFACT L0013091      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013091      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013091      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013092      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013092      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013092      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013092      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013093      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013093      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013093      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013093      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013094      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013094      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013094      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013094      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013095      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013095      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013095      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013095      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013096      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013096      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013096      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013096      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013097      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013097      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013097      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013097      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013098      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013098      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013098      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013098      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013099      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013099      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013099      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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   EMISFACT L0013100      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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   EMISFACT L0013100      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013100      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013101      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0013101      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0013101      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013101      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013102      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013102      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013102      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013102      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013103      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013103      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013103      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013103      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013104      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013104      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013104      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013104      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013105      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013105      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013105      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0013164      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EEC ORIGINAL PKG.

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EMISFACT	L0013165	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013165	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013165	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013167	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013168	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013169	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013169	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013231	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013232	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013290	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013291	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013293	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013294	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013294	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013296	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013306	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

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EMISFACT	L0013309	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013316	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013320	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013320	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013321	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013321	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

EEC ORIGINAL PKG.

EMISFACT	L0013322	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013322	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013323	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013327	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013337	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EEC ORIGINAL PKG.

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EEC ORIGINAL PKG.

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EMISFACT	L0013189	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013189	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013190	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013190	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

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EEC ORIGINAL PKG.

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EMISFACT	L0013207	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013208	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013216	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EEC ORIGINAL PKG.

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EMISFACT	L0013280	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013280	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013281	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013281	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013281	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013281	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013282	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013282	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013282	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013282	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013283	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013283	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013283	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013283	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013284	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013284	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013284	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013284	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013285	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013285	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013285	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013285	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013286	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013286	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013286	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013286	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013287	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013287	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013287	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013287	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013288	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013288	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013288	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013288	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013289	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013289	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013289	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013289	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013290	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013290	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013290	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013290	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013291	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013291	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013291	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013291	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013292	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013292	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013292	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013292	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013293	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013293	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013293	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013293	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013294	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013294	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013294	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013294	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013295	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013295	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013295	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013295	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013296	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013296	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013296	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013296	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013297	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013297	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013297	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013297	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013298	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013298	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013298	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013298	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013299	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013299	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013299	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013299	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013300	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013300	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013300	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013300	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013301	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013301	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013301	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013301	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013302	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013302	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013302	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013302	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013303	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013303	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013303	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013303	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013304	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013304	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013304	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013304	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013305	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013305	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013305	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013305	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013306	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013306	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013306	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013306	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013307	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013307	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013307	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013307	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013308	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013308	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013308	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013308	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013309	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013309	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013309	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013309	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013310	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013310	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013310	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013310	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013311	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013311	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013311	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013311	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013312	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013312	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013312	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013312	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013313	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013313	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013313	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013313	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013314	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013314	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013314	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013314	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013315	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013315	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013315	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013315	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013316	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013316	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013316	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013316	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013317	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013317	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013317	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013317	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013318	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013318	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013318	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013318	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013319	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013319	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013319	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013319	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013320	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013320	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013320	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013320	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013321	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013321	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013321	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013322	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013322	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013322	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013322	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013323	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013323	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013323	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013323	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013324	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013324	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013324	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013324	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013325	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013325	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013325	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013325	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013326	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013326	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013326	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013326	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013327	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013327	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013327	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013327	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013328	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013328	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013328	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013328	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013329	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013329	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013329	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013329	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013330	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013330	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013330	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013330	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013331	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013331	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013331	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013331	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013332	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013332	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013332	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013332	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013333	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013333	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013333	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013333	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013334	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013334	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013334	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013334	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013335	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013335	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013335	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013335	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013336	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013336	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013336	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013336	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013337	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013337	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013337	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013337	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013338	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013338	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013338	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013338	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013339	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013339	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013339	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013339	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013340	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013340	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013340	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013340	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013341	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013341	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013341	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013341	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013342	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013342	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013342	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013342	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013343	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013343	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013343	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013343	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013344	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013344	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013344	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013344	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013345	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013345	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013345	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013345	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013346	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013346	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013346	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013346	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013347	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013347	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013347	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013347	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013348	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013348	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013348	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013348	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013349	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013349	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013349	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013349	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013350	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013350	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013350	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013350	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013351	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013351	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013351	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013351	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013352	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013352	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013352	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013352	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013353	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013353	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013353	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013353	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013354	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013354	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013354	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013354	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013355	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013355	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013355	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013355	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013356	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013356	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013356	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013356	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013357	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013357	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013357	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013357	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013358	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013358	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013358	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013358	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013359	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013359	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013359	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013359	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013360	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013360	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013360	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013360	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013361	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013361	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013361	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013361	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013362	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013362	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013362	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013362	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013363	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013363	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013363	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013363	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013364	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013364	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013364	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013364	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013365	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013365	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013365	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013365	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013366	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013366	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013366	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013366	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013367	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013367	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013367	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013367	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013368	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013368	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013368	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013368	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013369	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013369	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013369	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013369	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013370	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013370	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013370	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013370	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013371	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013371	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013371	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013371	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013372	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013372	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013372	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013372	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013373	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013373	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013373	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013373	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013374	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013374	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013374	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013374	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013375	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013375	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013375	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013375	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013376	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013376	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013376	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013376	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013377	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013377	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013378	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013378	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013378	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013378	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013379	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013379	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013379	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013379	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013380	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013380	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013380	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013380	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013381	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013381	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013381	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013382	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013382	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013382	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013382	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013383	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013383	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013383	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013383	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013384	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013384	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013384	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013384	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013385	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013385	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013385	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013385	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013386	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013386	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013386	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013386	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013387	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013387	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013387	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013387	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013388	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013388	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013388	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013388	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013389	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013389	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013389	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

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EMISFACT L0013389     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013390     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013390     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0013390     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0013392     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0013392     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013392     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013393     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013393     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0013394     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0013405     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT	L0013406	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013406	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013407	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013407	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013407	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013410	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013410	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013411	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013411	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013412	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013413	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013416	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013417	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013419	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013420	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013420	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013420	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013420	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013421	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

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** WeekDays:
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EMISFACT L0013447      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0013450      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0013452      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
EMISFACT L0013452      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EEC ORIGINAL PKG.

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EMISFACT	L0013459	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013460	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013461	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT L0013499      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT L0013531      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EEC ORIGINAL PKG.

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EMISFACT	L0013531	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013532	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013532	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013532	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013532	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013533	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013533	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013533	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013533	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013534	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013534	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013534	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013535	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013535	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013535	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013535	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013536	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013538	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013539	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013539	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013540	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013540	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013541	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013541	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013541	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013541	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013542	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013542	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013543	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013545	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013545	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013545	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013545	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013546	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013546	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013546	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013546	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

EEC ORIGINAL PKG.

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EMISFACT	L0013548	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013549	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013549	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013550	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013550	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013550	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013551	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013552	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013552	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013553	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013553	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013553	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013554	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013554	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013555	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013555	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013557	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013558	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013558	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013559	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013559	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013559	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013559	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013560	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013560	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013560	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013560	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013561	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013561	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013561	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013561	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013562	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013562	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013562	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

EMISFACT	L0013562	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013563	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013563	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013563	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013563	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013564	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013564	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013564	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013565	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013565	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013565	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013566	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013566	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013566	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013567	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013567	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013568	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013568	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013569	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013569	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013570	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013570	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013570	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013570	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013571	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013571	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013571	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013572	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013572	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013572	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013572	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013573	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013573	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013573	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013573	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013574	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013574	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013574	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013575	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013575	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013575	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013575	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013576	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013576	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013576	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013577	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013577	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013577	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013577	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013578	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013578	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

EEC ORIGINAL PKG.

EMISFACT	L0013578	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013578	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013579	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013580	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013580	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013580	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013580	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013581	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013581	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013581	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013581	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013582	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013582	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013582	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013582	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013583	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013583	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013583	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013583	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013584	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013585	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013585	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013586	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013587	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013588	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013588	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013588	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013589	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013589	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013590	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013590	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013590	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013590	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013591	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013591	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013592	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013592	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013592	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013593	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013593	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013594	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

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EMISFACT	L0013679	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT L0013489      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EEC ORIGINAL PKG.

EMISFACT	L0013489	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013491	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013496	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT L0013521      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EMISFACT	L0013528	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013529	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013530	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013531	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013535	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013536	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
EMISFACT	L0013536	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0
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EMISFACT	L0013536	HRDOW	1.0	1.0	1.0	1.0	1.0	1.0

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EMISFACT	L0013466	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013467	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013467	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013467	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013468	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013468	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013468	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013469	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013469	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013470	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013470	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013470	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013470	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013471	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013472	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013473	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013476	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013477	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013477	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013478	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013482	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013484	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013487	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013488	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013488	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013495	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

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EMISFACT L0013525      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013525      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013525      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013525      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013526      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013526      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013526      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013526      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT	L0013527	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013531	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013540	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013551	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013558	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

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EMISFACT L0013574     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT	L0013575	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013575	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013575	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013575	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013576	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013576	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013576	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013576	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013577	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013578	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013579	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013579	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013579	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013580	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013581	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013581	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013582	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT L0013621      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0013652     HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT	L0013697	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013697	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013697	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013697	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013698	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013698	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013698	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013698	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013699	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013699	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013699	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013699	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013700	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013700	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013700	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013700	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013701	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013701	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013701	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013701	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013702	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013702	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013702	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013702	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013703	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013703	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013703	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013703	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013704	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013704	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013704	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013704	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013705	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013705	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013705	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013705	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013706	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013706	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013706	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013706	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013707	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013707	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013707	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013707	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013708	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013708	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013708	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013708	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013709	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013709	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013709	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013709	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013710	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013710	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013710	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013710	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013711	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013711	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013711	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013711	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013712	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013712	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013712	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013712	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013713	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013713	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013713	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013713	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013714	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013714	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013714	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013714	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013715	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013715	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013715	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013715	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013716	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013716	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013716	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013716	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013717	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013717	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013717	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013717	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013718	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013718	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013718	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013718	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013719	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013719	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013719	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013719	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013720	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013720	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013720	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013720	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013721	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013721	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013721	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013721	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013722	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013722	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013722	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013722	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013723	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013723	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013723	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013723	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013724	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013724	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013724	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013724	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013725	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013725	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013725	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013725	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013726	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013726	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013726	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013726	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013727	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013727	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013727	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013727	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013728	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013728	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013728	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013728	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013729	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013729	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013729	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013729	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013730	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013730	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013730	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013730	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013731	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013731	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013731	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013731	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013732	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013732	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013732	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013732	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013733	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013733	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013733	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013733	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013734	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013734	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013734	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013734	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013735	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013735	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013735	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013735	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013736	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013736	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013736	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013736	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013737	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013737	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013737	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013737	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013738	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013738	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013738	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013738	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013739	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013739	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013739	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013739	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013740	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013740	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013740	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013740	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013741	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013741	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013741	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013741	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013742	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013742	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013742	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013742	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013743	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013743	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013743	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013743	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013744	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013744	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013744	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013744	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013745	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013745	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013745	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013745	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013746	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013746	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013746	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013746	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013747	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013747	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013747	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013747	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013748	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013748	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013748	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013748	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013749	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013749	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013749	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013749	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013750	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013750	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013750	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013750	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013751	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013751	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013751	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013751	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013752	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013752	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013752	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013752	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013753	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013753	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013753	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013753	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013754	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013754	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013754	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013754	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013755	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013755	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013755	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013755	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013756	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013756	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013756	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013756	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013757	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013757	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013758	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013758	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013758	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013758	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013759	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013759	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013759	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013759	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013760	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013760	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013760	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013760	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013761	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013761	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013761	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013761	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013762	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013762	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013762	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013762	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013763	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013763	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013763	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013763	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013764	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013764	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013764	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013764	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013765	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013765	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013765	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013765	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013766	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013766	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013766	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013766	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013767	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013767	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013767	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013767	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013768	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013768	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013768	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013768	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013769	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013769	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013769	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013769	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013770	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013770	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013770	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013770	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013771	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013771	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013771	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013771	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013772	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013772	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013772	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013772	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013773	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013773	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013773	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013773	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013774	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013774	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013774	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013774	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013775	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013776	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013776	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013776	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013776	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013777	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013777	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013777	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013777	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013778	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013778	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013778	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013778	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013779	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013779	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013779	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013779	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013780	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013780	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013780	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013781	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013781	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013781	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013782	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013782	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013784	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013784	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013785	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013785	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013785	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013785	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013786	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013786	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013786	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013787	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013787	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013787	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013788	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013788	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013788	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013788	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013789	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013789	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013789	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013790	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013790	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013791	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013791	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013791	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013791	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013792	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013792	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013792	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013792	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013793	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013793	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013793	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013793	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013794	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013794	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013794	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

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   EMISFACT L0013794      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013795      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013795      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013795      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013795      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013796      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013796      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013796      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013796      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013797      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013797      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013797      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013797      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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   EMISFACT L0013798      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013798      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013798      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
** WeekDays:
   EMISFACT L0012898      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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   EMISFACT L0012898      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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   EMISFACT L0012899      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0012899      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0012899      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0012899      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0012900      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0012900      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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   EMISFACT L0012901      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT L0012901      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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   EMISFACT L0012902      HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
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EEC ORIGINAL PKG.

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EEC ORIGINAL PKG.

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EEC ORIGINAL PKG.

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EEC ORIGINAL PKG.

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EEC ORIGINAL PKG.

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EMISFACT	L0012935	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0012938	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT L0012995      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT	L0013043	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013043	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013044	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013044	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013044	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013047	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013047	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013047	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013047	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013048	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013048	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013048	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013048	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013049	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013049	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013049	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013049	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013050	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013050	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013050	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013050	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013051	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013051	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013051	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013051	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013052	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013052	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013052	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013052	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013053	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013053	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013053	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013053	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013054	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013054	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013054	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013054	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013055	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013055	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013055	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013055	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013056	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013056	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013056	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013056	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013057	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013057	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013057	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013057	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013058	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

EMISFACT	L0013058	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013058	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013058	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013059	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013059	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013059	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013059	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013060	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013060	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013060	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013060	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013061	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013061	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013061	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013061	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013062	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013062	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013062	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013062	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013063	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013063	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013063	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013063	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013064	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013064	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013064	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013064	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013065	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013065	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013065	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013065	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013066	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013066	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013066	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013066	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013067	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013067	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013067	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013067	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013068	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013068	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013068	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013068	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013069	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013069	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013069	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013069	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013070	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013070	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013070	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013070	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013071	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013071	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013071	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
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EMISFACT	L0013072	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013072	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013072	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013072	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013073	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013073	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013073	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0
EMISFACT	L0013073	HRDOW	0.0	0.0	0.0	0.0	0.0	0.0

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EMISFACT L0013074      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013074      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013074      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013074      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013075      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013075      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013075      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013075      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013076      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013076      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013076      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013076      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013077      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013077      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013077      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013077      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013078      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013078      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013078      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013078      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013079      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013079      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013079      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013079      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013080      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013080      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013080      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013080      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013081      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013081      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013081      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013081      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013082      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013082      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013082      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013082      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013083      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013083      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013083      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013083      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013084      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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EMISFACT L0013084      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013084      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013085      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013085      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013085      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013085      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013086      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013086      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013086      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013086      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013087      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013087      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013087      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013087      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013088      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013088      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013088      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013088      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013089      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013089      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
EMISFACT L0013089      HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
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   EMISFACT L0013089       HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013090       HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013090       HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013090       HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT L0013090       HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
** WeekDays:
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
** Saturday:
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
   EMISFACT IDLE           HRDOW 1.0 1.0 1.0 1.0 1.0 1.0
** Sunday:
   EMISFACT IDLE           HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLE           HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLE           HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   EMISFACT IDLE           HRDOW 0.0 0.0 0.0 0.0 0.0 0.0
   SRCGROUP ALL
SO FINISHED
**
****************************************
** AERMOD Receptor Pathway
****************************************
**
**
RE STARTING
** DESCRREC "" ""
   DISCCART    642210.41   3666301.67  -48.52  -48.52
   DISCCART    639942.24   3665491.50  -52.73  -52.73
   DISCCART    639720.35   3666165.80  -52.22  -52.22
   DISCCART    639621.58   3666194.97  -52.43  -52.43
   DISCCART    639478.97   3666549.45  -53.04  -53.04
   DISCCART    639643.07   3666970.00  -52.12  -52.12
** BEGIN OF FENCELINE GRID RECEPTORS
** Plant Boundary Name PLBN1
** Grid Spacing = 150.00
** No. of Tiers = 1
** Tier 1: Segment Distance = 750.00
** Tier 1: Tier Spacing = 150.00
** ----------
   DISCCART    640558.86   3667164.65  -51.21  -51.21
   DISCCART    640816.56   3667168.84  -50.90  -50.90
   DISCCART    641074.25   3667173.02  -50.32  -50.32
   DISCCART    641331.94   3667177.21  -49.68  -49.68
   DISCCART    640451.08   3667268.97  -51.51  -51.51
   DISCCART    640303.53   3667116.52  -51.82  -51.82
   DISCCART    640685.27   3667316.72  -51.05  -51.05
   DISCCART    640942.97   3667320.91  -50.60  -50.60
   DISCCART    641200.66   3667325.10  -50.09  -50.09
   DISCCART    640448.64   3667418.95  -51.51  -51.51
   DISCCART    640195.75   3667220.84  -51.51  -51.51
   DISCCART    640682.84   3667466.70  -51.21  -51.21
   DISCCART    640940.53   3667470.89  -50.60  -50.60
   DISCCART    641198.22   3667475.08  -50.01  -50.01
   DISCCART    640446.20   3667568.93  -51.51  -51.51
   DISCCART    640235.51   3667477.60  -51.51  -51.51
   DISCCART    640087.96   3667325.16  -51.82  -51.82
   DISCCART    640003.58   3667111.59  -51.97  -51.97
   DISCCART    640680.40   3667616.68  -51.21  -51.21
   DISCCART    640938.09   3667620.87  -50.60  -50.60
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EEC ORIGINAL PKG.

DISCCART	641195.79	3667625.06	-50.03	-50.03
DISCCART	640443.77	3667718.91	-51.51	-51.51
DISCCART	640233.07	3667627.58	-51.51	-51.51
DISCCART	639980.18	3667429.48	-51.82	-51.82
DISCCART	639895.79	3667215.91	-52.12	-52.12
DISCCART	640677.96	3667766.66	-51.14	-51.14
DISCCART	640935.66	3667770.85	-50.60	-50.60
DISCCART	641193.35	3667775.04	-50.06	-50.06
DISCCART	641484.36	3667029.67	-49.38	-49.38
DISCCART	641488.56	3666771.80	-49.38	-49.38
DISCCART	641492.75	3666513.92	-49.54	-49.54
DISCCART	641496.95	3666256.05	-49.99	-49.99
DISCCART	641588.69	3667137.45	-49.38	-49.38
DISCCART	641436.27	3667284.99	-49.68	-49.68
DISCCART	641636.44	3666903.17	-49.07	-49.07
DISCCART	641640.64	3666645.30	-49.38	-49.38
DISCCART	641644.83	3666387.43	-49.52	-49.52
DISCCART	641738.67	3667139.89	-49.07	-49.07
DISCCART	641540.60	3667392.76	-49.38	-49.38
DISCCART	641786.42	3666905.62	-49.07	-49.07
DISCCART	641790.62	3666647.74	-49.07	-49.07
DISCCART	641794.81	3666389.87	-49.68	-49.68
DISCCART	641888.65	3667142.33	-48.67	-48.67
DISCCART	641797.34	3667353.00	-49.07	-49.07
DISCCART	641644.93	3667500.54	-49.38	-49.38
DISCCART	641431.40	3667584.95	-49.68	-49.68
DISCCART	641936.40	3666908.06	-48.77	-48.77
DISCCART	641940.60	3666650.18	-48.85	-48.85
DISCCART	641944.79	3666392.31	-49.38	-49.38
DISCCART	642038.63	3667144.77	-48.27	-48.27
DISCCART	641947.32	3667355.44	-48.77	-48.77
DISCCART	641749.25	3667608.32	-49.07	-49.07
DISCCART	641535.73	3667692.72	-49.38	-49.38
DISCCART	642086.38	3666910.50	-48.46	-48.46
DISCCART	642090.58	3666652.62	-48.92	-48.92
DISCCART	642094.77	3666394.75	-49.07	-49.07
DISCCART	641349.47	3666103.63	-50.29	-50.29
DISCCART	641091.82	3666099.34	-50.29	-50.29
DISCCART	640834.17	3666095.05	-50.74	-50.74
DISCCART	640576.53	3666090.76	-51.21	-51.21
DISCCART	641457.26	3665999.33	-49.99	-49.99
DISCCART	641604.75	3666151.75	-49.77	-49.77
DISCCART	641223.14	3665951.51	-50.60	-50.60
DISCCART	640965.49	3665947.22	-50.90	-50.90
DISCCART	640707.85	3665942.93	-51.33	-51.33
DISCCART	641459.76	3665849.35	-49.99	-49.99
DISCCART	641712.55	3666047.44	-49.38	-49.38
DISCCART	641225.64	3665801.53	-50.60	-50.60
DISCCART	640967.99	3665797.24	-50.90	-50.90
DISCCART	640710.35	3665792.95	-51.51	-51.51
DISCCART	641462.26	3665699.37	-49.99	-49.99
DISCCART	641672.86	3665790.71	-49.45	-49.45
DISCCART	641820.34	3665943.13	-49.38	-49.38
DISCCART	641904.71	3666156.63	-49.07	-49.07
DISCCART	641228.14	3665651.55	-50.57	-50.57
DISCCART	640970.49	3665647.26	-50.90	-50.90
DISCCART	640712.84	3665642.97	-51.28	-51.28
DISCCART	641464.76	3665549.39	-49.99	-49.99
DISCCART	641675.36	3665640.73	-49.43	-49.43
DISCCART	641928.14	3665838.83	-49.07	-49.07
DISCCART	642012.51	3666052.32	-49.07	-49.07
DISCCART	641230.63	3665501.57	-50.29	-50.29
DISCCART	640972.99	3665497.28	-50.90	-50.90

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   DISCCART     640715.34   3665492.99  -51.26  -51.26
   DISCCART     640424.05   3666238.27  -51.21  -51.21
   DISCCART     640419.81   3666496.25  -51.51  -51.51
   DISCCART     640415.56   3666754.23  -51.51  -51.51
   DISCCART     640411.32   3667012.20  -51.51  -51.51
   DISCCART     640319.75   3666130.47  -51.51  -51.51
   DISCCART     640472.23   3665982.95  -51.51  -51.51
   DISCCART     640271.95   3666364.79  -51.51  -51.51
   DISCCART     640267.71   3666622.77  -51.82  -51.82
   DISCCART     640263.46   3666880.75  -51.82  -51.82
   DISCCART     640169.77   3666128.00  -51.51  -51.51
   DISCCART     640367.93   3665875.15  -51.82  -51.82
   DISCCART     640121.97   3666362.33  -51.51  -51.51
   DISCCART     640117.73   3666620.30  -51.82  -51.82
   DISCCART     640113.48   3666878.28  -51.82  -51.82
   DISCCART     640019.79   3666125.53  -51.82  -51.82
   DISCCART     640111.16   3665914.85  -51.82  -51.82
   DISCCART     640263.64   3665767.34  -52.12  -52.12
   DISCCART     640477.23   3665683.00  -51.82  -51.82
   DISCCART     639971.99   3666359.86  -51.82  -51.82
   DISCCART     639967.75   3666617.84  -51.82  -51.82
   DISCCART     639963.50   3666875.81  -51.82  -51.82
   DISCCART     639869.81   3666123.07  -52.12  -52.12
   DISCCART     639961.18   3665912.39  -52.30  -52.30
   DISCCART     640159.34   3665659.53  -52.33  -52.33
   DISCCART     640372.93   3665575.19  -51.82  -51.82
   DISCCART     639822.01   3666357.39  -51.82  -51.82
   DISCCART     639817.77   3666615.37  -51.82  -51.82
   DISCCART     639813.52   3666873.35  -52.12  -52.12
** END OF FENCELINE GRID RECEPTORS
** Discrete Cartesian Plant Boundary - Primary Receptors
** Plant Boundary Name PLBN1
** DESCRREC "FENCEPRI" "Cartesian plant boundary Primary Receptors"
   DISCCART     640574.03   3666240.74  -50.90  -50.90
   DISCCART     640561.30   3667014.67  -51.27  -51.27
   DISCCART     641334.38   3667027.23  -49.42  -49.42
   DISCCART     641346.97   3666253.61  -49.68  -49.68
RE FINISHED
**
****************************************
** AERMOD Meteorology Pathway
****************************************
**
**
ME STARTING
   SURFFILE ..\747185\747185.SFC
   PROFFILE ..\747185\747185.PFL
   SURFDATA 3144 2009 572.67 3729.90
   UAIRDATA 3190 2009
   PROFBASE -4.0 METERS
ME FINISHED
**
****************************************
** AERMOD Output Pathway
****************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 24 1ST
** Auto-Generated Plotfiles
   PLOTFILE 24 ALL 1ST CANCER.AD\24H1GALL.PLT 31
   PLOTFILE ANNUAL ALL CANCER.AD\AN00GALL.PLT 32
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   SUMMFILE Cancer.sum
OU FINISHED
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** Project Parameters
****************************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
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* AERMOD ( 19191): Blair Ranch Hay Processing Expansion Project - DPM Calculations        01/26/20
* AERMET ( 14134):                                                                        15:33:35
* MODELING OPTIONS USED:   RegDFAULT  CONC  ELEV  RURAL
*         PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS   5 YEARS FOR SOURCE GROUP: ALL
*         FOR A TOTAL OF   122 RECEPTORS.
*         FORMAT: (3(1X,F13.5),3(1X,F8.2),2X,A6,2X,A8,2X,I8.8,2X,A8)
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X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	NUM YRS	NET ID
642210.41000	3666301.67000	0.00624	-48.52	-48.52	0.00	ANNUAL	ALL	00000005	
639942.24000	3665491.50000	0.00094	-52.73	-52.73	0.00	ANNUAL	ALL	00000005	
639720.35000	3666165.80000	0.01189	-52.22	-52.22	0.00	ANNUAL	ALL	00000005	
639621.58000	3666194.97000	0.01709	-52.43	-52.43	0.00	ANNUAL	ALL	00000005	
639478.97000	3666549.45000	0.00330	-53.04	-53.04	0.00	ANNUAL	ALL	00000005	
639643.07000	3666970.00000	0.00315	-52.12	-52.12	0.00	ANNUAL	ALL	00000005	
640558.86000	3667164.65000	0.01809	-51.21	-51.21	0.00	ANNUAL	ALL	00000005	
640816.56000	3667168.84000	0.00961	-50.90	-50.90	0.00	ANNUAL	ALL	00000005	
641074.25000	3667173.02000	0.00864	-50.32	-50.32	0.00	ANNUAL	ALL	00000005	
641331.94000	3667177.21000	0.00885	-49.68	-49.68	0.00	ANNUAL	ALL	00000005	
640451.08000	3667268.97000	0.00787	-51.51	-51.51	0.00	ANNUAL	ALL	00000005	
640303.53000	3667116.52000	0.00703	-51.82	-51.82	0.00	ANNUAL	ALL	00000005	
640685.27000	3667316.72000	0.01012	-51.05	-51.05	0.00	ANNUAL	ALL	00000005	
640942.97000	3667320.91000	0.00675	-50.60	-50.60	0.00	ANNUAL	ALL	00000005	
641200.66000	3667325.10000	0.00615	-50.09	-50.09	0.00	ANNUAL	ALL	00000005	
640448.64000	3667418.95000	0.00697	-51.51	-51.51	0.00	ANNUAL	ALL	00000005	
640195.75000	3667220.84000	0.00537	-51.51	-51.51	0.00	ANNUAL	ALL	00000005	
640682.84000	3667466.70000	0.00900	-51.21	-51.21	0.00	ANNUAL	ALL	00000005	
640940.53000	3667470.89000	0.00563	-50.60	-50.60	0.00	ANNUAL	ALL	00000005	
641198.22000	3667475.08000	0.00482	-50.01	-50.01	0.00	ANNUAL	ALL	00000005	
640446.20000	3667568.93000	0.00634	-51.51	-51.51	0.00	ANNUAL	ALL	00000005	
640235.51000	3667477.60000	0.00416	-51.51	-51.51	0.00	ANNUAL	ALL	00000005	
640087.96000	3667325.16000	0.00429	-51.82	-51.82	0.00	ANNUAL	ALL	00000005	
640003.58000	3667111.59000	0.00472	-51.97	-51.97	0.00	ANNUAL	ALL	00000005	
640680.40000	3667616.68000	0.00810	-51.21	-51.21	0.00	ANNUAL	ALL	00000005	
640938.09000	3667620.87000	0.00483	-50.60	-50.60	0.00	ANNUAL	ALL	00000005	
641195.79000	3667625.06000	0.00395	-50.03	-50.03	0.00	ANNUAL	ALL	00000005	
640443.77000	3667718.91000	0.00577	-51.51	-51.51	0.00	ANNUAL	ALL	00000005	
640233.07000	3667627.58000	0.00356	-51.51	-51.51	0.00	ANNUAL	ALL	00000005	
639980.18000	3667429.48000	0.00353	-51.82	-51.82	0.00	ANNUAL	ALL	00000005	
639895.79000	3667215.91000	0.00383	-52.12	-52.12	0.00	ANNUAL	ALL	00000005	
640677.96000	3667766.66000	0.00687	-51.14	-51.14	0.00	ANNUAL	ALL	00000005	
640935.66000	3667770.85000	0.00396	-50.60	-50.60	0.00	ANNUAL	ALL	00000005	
641193.35000	3667775.04000	0.00323	-50.06	-50.06	0.00	ANNUAL	ALL	00000005	
641484.36000	3667029.67000	0.01349	-49.38	-49.38	0.00	ANNUAL	ALL	00000005	
641488.56000	3666771.80000	0.02187	-49.38	-49.38	0.00	ANNUAL	ALL	00000005	
641492.75000	3666513.92000	0.02076	-49.54	-49.54	0.00	ANNUAL	ALL	00000005	

EEC ORIGINAL PKG.

641496.95000	3666256.05000	0.01230	-49.99	-49.99	0.00	ANNUAL	ALL	00000005
641588.69000	3667137.45000	0.00972	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
641436.27000	3667284.99000	0.00688	-49.68	-49.68	0.00	ANNUAL	ALL	00000005
641636.44000	3666903.17000	0.01551	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641640.64000	3666645.30000	0.01757	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
641644.83000	3666387.43000	0.01328	-49.52	-49.52	0.00	ANNUAL	ALL	00000005
641738.67000	3667139.89000	0.00924	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641540.60000	3667392.76000	0.00555	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
641786.42000	3666905.62000	0.01321	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641790.62000	3666647.74000	0.01408	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641794.81000	3666389.87000	0.01083	-49.68	-49.68	0.00	ANNUAL	ALL	00000005
641888.65000	3667142.33000	0.00867	-48.67	-48.67	0.00	ANNUAL	ALL	00000005
641797.34000	3667353.00000	0.00592	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641644.93000	3667500.54000	0.00460	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
641431.40000	3667584.95000	0.00401	-49.68	-49.68	0.00	ANNUAL	ALL	00000005
641936.40000	3666908.06000	0.01133	-48.77	-48.77	0.00	ANNUAL	ALL	00000005
641940.60000	3666650.18000	0.01153	-48.85	-48.85	0.00	ANNUAL	ALL	00000005
641944.79000	3666392.31000	0.00905	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
642038.63000	3667144.77000	0.00805	-48.27	-48.27	0.00	ANNUAL	ALL	00000005
641947.32000	3667355.44000	0.00577	-48.77	-48.77	0.00	ANNUAL	ALL	00000005
641749.25000	3667608.32000	0.00388	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641535.73000	3667692.72000	0.00342	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
642086.38000	3666910.50000	0.00979	-48.46	-48.46	0.00	ANNUAL	ALL	00000005
642090.58000	3666652.62000	0.00962	-48.92	-48.92	0.00	ANNUAL	ALL	00000005
642094.77000	3666394.75000	0.00772	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641349.47000	3666103.63000	0.00843	-50.29	-50.29	0.00	ANNUAL	ALL	00000005
641091.82000	3666099.34000	0.00953	-50.29	-50.29	0.00	ANNUAL	ALL	00000005
640834.17000	3666095.05000	0.01091	-50.74	-50.74	0.00	ANNUAL	ALL	00000005
640576.53000	3666090.76000	0.01097	-51.21	-51.21	0.00	ANNUAL	ALL	00000005
641457.26000	3665999.33000	0.00585	-49.99	-49.99	0.00	ANNUAL	ALL	00000005
641604.75000	3666151.75000	0.00825	-49.77	-49.77	0.00	ANNUAL	ALL	00000005
641223.14000	3665951.51000	0.00546	-50.60	-50.60	0.00	ANNUAL	ALL	00000005
640965.49000	3665947.22000	0.00582	-50.90	-50.90	0.00	ANNUAL	ALL	00000005
640707.85000	3665942.93000	0.00559	-51.33	-51.33	0.00	ANNUAL	ALL	00000005
641459.76000	3665849.35000	0.00390	-49.99	-49.99	0.00	ANNUAL	ALL	00000005
641712.55000	3666047.44000	0.00591	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
641225.64000	3665801.53000	0.00368	-50.60	-50.60	0.00	ANNUAL	ALL	00000005
640967.99000	3665797.24000	0.00374	-50.90	-50.90	0.00	ANNUAL	ALL	00000005
640710.35000	3665792.95000	0.00335	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
641462.26000	3665699.37000	0.00280	-49.99	-49.99	0.00	ANNUAL	ALL	00000005
641672.86000	3665790.71000	0.00325	-49.45	-49.45	0.00	ANNUAL	ALL	00000005
641820.34000	3665943.13000	0.00444	-49.38	-49.38	0.00	ANNUAL	ALL	00000005
641904.71000	3666156.63000	0.00657	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641228.14000	3665651.55000	0.00264	-50.57	-50.57	0.00	ANNUAL	ALL	00000005
640970.49000	3665647.26000	0.00259	-50.90	-50.90	0.00	ANNUAL	ALL	00000005

640712.84000	3665642.97000	0.00224	-51.28	-51.28	0.00	ANNUAL	ALL	00000005
641464.76000	3665549.39000	0.00211	-49.99	-49.99	0.00	ANNUAL	ALL	00000005
641675.36000	3665640.73000	0.00239	-49.43	-49.43	0.00	ANNUAL	ALL	00000005
641928.14000	3665838.83000	0.00344	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
642012.51000	3666052.32000	0.00507	-49.07	-49.07	0.00	ANNUAL	ALL	00000005
641230.63000	3665501.57000	0.00197	-50.29	-50.29	0.00	ANNUAL	ALL	00000005
640972.99000	3665497.28000	0.00188	-50.90	-50.90	0.00	ANNUAL	ALL	00000005
640715.34000	3665492.99000	0.00165	-51.26	-51.26	0.00	ANNUAL	ALL	00000005
640424.05000	3666238.27000	0.09718	-51.21	-51.21	0.00	ANNUAL	ALL	00000005
640419.81000	3666496.25000	0.02353	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640415.56000	3666754.23000	0.01672	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640411.32000	3667012.20000	0.00997	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640319.75000	3666130.47000	0.01305	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640472.23000	3665982.95000	0.00556	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640271.95000	3666364.79000	0.01855	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640267.71000	3666622.77000	0.01180	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
640263.46000	3666880.75000	0.00915	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
640169.77000	3666128.00000	0.01180	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640367.93000	3665875.15000	0.00323	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
640121.97000	3666362.33000	0.01615	-51.51	-51.51	0.00	ANNUAL	ALL	00000005
640117.73000	3666620.30000	0.00801	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
640113.48000	3666878.28000	0.00679	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
640019.79000	3666125.53000	0.01039	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
640111.16000	3665914.85000	0.00295	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
640263.64000	3665767.34000	0.00212	-52.12	-52.12	0.00	ANNUAL	ALL	00000005
640477.23000	3665683.00000	0.00207	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
639971.99000	3666359.86000	0.01397	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
639967.75000	3666617.84000	0.00602	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
639963.50000	3666875.81000	0.00517	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
639869.81000	3666123.07000	0.00855	-52.12	-52.12	0.00	ANNUAL	ALL	00000005
639961.18000	3665912.39000	0.00259	-52.30	-52.30	0.00	ANNUAL	ALL	00000005
640159.34000	3665659.53000	0.00152	-52.33	-52.33	0.00	ANNUAL	ALL	00000005
640372.93000	3665575.19000	0.00156	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
639822.01000	3666357.39000	0.01124	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
639817.77000	3666615.37000	0.00477	-51.82	-51.82	0.00	ANNUAL	ALL	00000005
639813.52000	3666873.35000	0.00406	-52.12	-52.12	0.00	ANNUAL	ALL	00000005
640574.03000	3666240.74000	0.16802	-50.90	-50.90	0.00	ANNUAL	ALL	00000005
640561.30000	3667014.67000	0.02017	-51.27	-51.27	0.00	ANNUAL	ALL	00000005
641334.38000	3667027.23000	0.01461	-49.42	-49.42	0.00	ANNUAL	ALL	00000005
641346.97000	3666253.61000	0.01480	-49.68	-49.68	0.00	ANNUAL	ALL	00000005

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

EEC ORIGINAL PKG.

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* AERMOD ( 15181): Blair Ranch Hay Processing Expansion Project - DPM Calculations        07/05/16
* AERMET ( 14134): PM10 Cancer                                                             13:46:12
* MODELING OPTIONS USED:  RegDFAULT CONC       ELEV      RURAL
*         PLOT FILE OF  HIGH   1ST HIGH  1-HR VALUES FOR SOURCE GROUP: ALL
*         FOR A TOTAL OF   365 RECEPTORS.
*         FORMAT: (3(1X,F13.5),3(1X,F8.2),3X,A5,2X,A8,2X,A5,5X,A8,2X,I8)
*
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X	Y	AVERAGE CONC	ZELEV	ZHILL	ZFLAG	AVE	GRP	RANK	NET ID	DATE(CONC)
642167.00000	3666296.00000	1.58415	-48.73	-48.73	0.00	1-HR	ALL	1ST		8121920
639955.00000	3665501.00000	1.46479	-52.73	-52.73	0.00	1-HR	ALL	1ST		12010707
639728.00000	3666174.00000	1.92546	-52.14	-52.14	0.00	1-HR	ALL	1ST		7012705
639620.00000	3666203.00000	2.19698	-52.43	-52.43	0.00	1-HR	ALL	1ST		7012705
639483.00000	3666551.00000	1.37501	-53.04	-53.04	0.00	1-HR	ALL	1ST		12121023
639652.00000	3666970.00000	1.46608	-52.12	-52.12	0.00	1-HR	ALL	1ST		7011405
640559.78000	3667108.41000	5.05725	-51.21	-51.21	0.00	1-HR	ALL	1ST		7012707
640656.41000	3667109.98000	2.78892	-51.21	-51.21	0.00	1-HR	ALL	1ST		9122823
640753.05000	3667111.55000	2.37002	-50.90	-50.90	0.00	1-HR	ALL	1ST		9092321
640849.68000	3667113.12000	2.16502	-50.90	-50.90	0.00	1-HR	ALL	1ST		10112403
640946.32000	3667114.69000	2.01818	-50.90	-50.90	0.00	1-HR	ALL	1ST		12122704
641042.95000	3667116.26000	2.00194	-50.62	-50.62	0.00	1-HR	ALL	1ST		10112307
641139.59000	3667117.83000	2.00962	-50.29	-50.29	0.00	1-HR	ALL	1ST		12021805
641236.22000	3667119.40000	2.02942	-49.99	-49.99	0.00	1-HR	ALL	1ST		12021505
641332.86000	3667120.97000	2.07827	-49.68	-49.68	0.00	1-HR	ALL	1ST		9120921
640492.41000	3667173.61000	3.43739	-51.51	-51.51	0.00	1-HR	ALL	1ST		7012707
640400.20000	3667078.33000	2.69052	-51.51	-51.51	0.00	1-HR	ALL	1ST		12012401
640654.89000	3667203.72000	2.62352	-51.21	-51.21	0.00	1-HR	ALL	1ST		9122823
640751.52000	3667205.29000	2.24787	-50.90	-50.90	0.00	1-HR	ALL	1ST		10112403
640848.16000	3667206.86000	2.05789	-50.84	-50.84	0.00	1-HR	ALL	1ST		12122703
640944.79000	3667208.43000	1.93640	-50.60	-50.60	0.00	1-HR	ALL	1ST		12122704
641041.43000	3667210.00000	1.89689	-50.38	-50.38	0.00	1-HR	ALL	1ST		10112307
641138.06000	3667211.57000	1.89809	-50.29	-50.29	0.00	1-HR	ALL	1ST		8122719
641234.70000	3667213.14000	1.91457	-49.99	-49.99	0.00	1-HR	ALL	1ST		12021805
641331.33000	3667214.71000	1.94009	-49.68	-49.68	0.00	1-HR	ALL	1ST		12021505
640490.89000	3667267.34000	3.35978	-51.51	-51.51	0.00	1-HR	ALL	1ST		9122823
640332.83000	3667143.53000	2.39770	-51.82	-51.82	0.00	1-HR	ALL	1ST		7121520
640653.37000	3667297.45000	2.49549	-51.21	-51.21	0.00	1-HR	ALL	1ST		12010318
640750.00000	3667299.02000	2.15200	-50.90	-50.90	0.00	1-HR	ALL	1ST		12012402
640846.64000	3667300.59000	1.95892	-50.84	-50.84	0.00	1-HR	ALL	1ST		7042924
640943.27000	3667302.16000	1.85796	-50.60	-50.60	0.00	1-HR	ALL	1ST		12122704
641039.91000	3667303.73000	1.81534	-50.29	-50.29	0.00	1-HR	ALL	1ST		12122704
641136.54000	3667305.30000	1.81424	-50.29	-50.29	0.00	1-HR	ALL	1ST		10112307
641233.18000	3667306.87000	1.82000	-49.99	-49.99	0.00	1-HR	ALL	1ST		8122719
641329.81000	3667308.44000	1.83177	-49.89	-49.89	0.00	1-HR	ALL	1ST		12021805
640379.63000	3667313.52000	2.39329	-51.76	-51.76	0.00	1-HR	ALL	1ST		12061622
640221.51000	3667097.49000	2.10879	-51.82	-51.82	0.00	1-HR	ALL	1ST		8021219
640555.21000	3667389.62000	4.11906	-51.36	-51.36	0.00	1-HR	ALL	1ST		10112403
640651.84000	3667391.19000	2.40688	-51.21	-51.21	0.00	1-HR	ALL	1ST		10112403

EEC ORIGINAL PKG.

640748.48000	3667392.76000	2.06496	-50.90	-50.90	0.00	1-HR	ALL	1ST	12122703
640845.11000	3667394.33000	1.88562	-50.85	-50.85	0.00	1-HR	ALL	1ST	9122423
640941.75000	3667395.90000	1.79338	-50.60	-50.60	0.00	1-HR	ALL	1ST	9122423
641038.38000	3667397.47000	1.75392	-50.29	-50.29	0.00	1-HR	ALL	1ST	12122704
641135.02000	3667399.04000	1.72969	-50.29	-50.29	0.00	1-HR	ALL	1ST	12081804
641231.65000	3667400.61000	1.73483	-49.99	-49.99	0.00	1-HR	ALL	1ST	10112307
641328.29000	3667402.18000	1.74941	-49.99	-49.99	0.00	1-HR	ALL	1ST	12021805
640471.38000	3667447.68000	2.92637	-51.51	-51.51	0.00	1-HR	ALL	1ST	10110918
640306.77000	3667376.34000	2.15162	-51.82	-51.82	0.00	1-HR	ALL	1ST	12100120
640191.51000	3667257.24000	2.04721	-51.51	-51.51	0.00	1-HR	ALL	1ST	7121520
640125.58000	3667090.39000	1.95074	-51.82	-51.82	0.00	1-HR	ALL	1ST	8121921
640650.32000	3667484.93000	2.31743	-51.21	-51.21	0.00	1-HR	ALL	1ST	12012402
640746.96000	3667486.50000	1.97831	-50.90	-50.90	0.00	1-HR	ALL	1ST	12122703
640843.59000	3667488.07000	1.82531	-50.87	-50.87	0.00	1-HR	ALL	1ST	9122423
640940.23000	3667489.64000	1.73532	-50.60	-50.60	0.00	1-HR	ALL	1ST	10123121
641036.86000	3667491.21000	1.69299	-50.29	-50.29	0.00	1-HR	ALL	1ST	12122704
641133.50000	3667492.78000	1.66352	-50.29	-50.29	0.00	1-HR	ALL	1ST	10011619
641230.13000	3667494.35000	1.66682	-49.99	-49.99	0.00	1-HR	ALL	1ST	10112307
641326.77000	3667495.92000	1.66973	-49.92	-49.92	0.00	1-HR	ALL	1ST	8122719
640473.15000	3667542.85000	2.93150	-51.51	-51.51	0.00	1-HR	ALL	1ST	12010318
640315.13000	3667474.36000	2.07979	-51.82	-51.82	0.00	1-HR	ALL	1ST	12113004
640125.46000	3667325.77000	1.92389	-51.76	-51.76	0.00	1-HR	ALL	1ST	7121520
640062.17000	3667165.60000	1.86378	-51.82	-51.82	0.00	1-HR	ALL	1ST	8121921
640648.80000	3667578.67000	2.23306	-51.21	-51.21	0.00	1-HR	ALL	1ST	12122703
640745.43000	3667580.24000	1.90430	-50.90	-50.90	0.00	1-HR	ALL	1ST	10100819
640842.07000	3667581.81000	1.76667	-50.89	-50.89	0.00	1-HR	ALL	1ST	9122423
640938.70000	3667583.38000	1.68103	-50.60	-50.60	0.00	1-HR	ALL	1ST	10123121
641035.34000	3667584.95000	1.63074	-50.29	-50.29	0.00	1-HR	ALL	1ST	12122704
641131.97000	3667586.52000	1.61113	-50.29	-50.29	0.00	1-HR	ALL	1ST	12122704
641228.61000	3667588.09000	1.59544	-49.99	-49.99	0.00	1-HR	ALL	1ST	12081804
641325.24000	3667589.66000	1.60583	-49.94	-49.94	0.00	1-HR	ALL	1ST	10112307
640473.82000	3667637.54000	2.95499	-51.51	-51.51	0.00	1-HR	ALL	1ST	10112403
640320.19000	3667570.95000	2.02321	-51.82	-51.82	0.00	1-HR	ALL	1ST	9122823
640166.56000	3667504.36000	1.86390	-51.51	-51.51	0.00	1-HR	ALL	1ST	7012707
640058.97000	3667393.20000	1.81836	-51.82	-51.82	0.00	1-HR	ALL	1ST	7121520
639997.44000	3667237.47000	1.77453	-51.82	-51.82	0.00	1-HR	ALL	1ST	12090424
639935.91000	3667081.74000	1.69574	-52.12	-52.12	0.00	1-HR	ALL	1ST	9082002
640647.27000	3667672.40000	2.14350	-51.21	-51.21	0.00	1-HR	ALL	1ST	12122703
640743.91000	3667673.97000	1.84125	-50.90	-50.90	0.00	1-HR	ALL	1ST	9122423
640840.54000	3667675.54000	1.70788	-50.90	-50.90	0.00	1-HR	ALL	1ST	9122423
640937.18000	3667677.11000	1.62779	-50.60	-50.60	0.00	1-HR	ALL	1ST	10123121
641033.81000	3667678.68000	1.57284	-50.29	-50.29	0.00	1-HR	ALL	1ST	12090404
641130.45000	3667680.25000	1.55968	-50.29	-50.29	0.00	1-HR	ALL	1ST	12122704
641227.08000	3667681.82000	1.53827	-49.99	-49.99	0.00	1-HR	ALL	1ST	10011619
641323.72000	3667683.39000	1.54538	-49.95	-49.95	0.00	1-HR	ALL	1ST	10112307
640373.54000	3667688.47000	2.06554	-51.68	-51.68	0.00	1-HR	ALL	1ST	12010318
640197.95000	3667612.36000	1.80987	-51.51	-51.51	0.00	1-HR	ALL	1ST	7111205

639952.05000	3667358.29000	1.71069	-52.00	-52.00	0.00	1-HR	ALL	1ST	12012401
639881.73000	3667180.31000	1.66223	-52.12	-52.12	0.00	1-HR	ALL	1ST	10011903
640549.12000	3667764.57000	3.36998	-51.21	-51.21	0.00	1-HR	ALL	1ST	12122703
640645.75000	3667766.14000	2.05114	-51.21	-51.21	0.00	1-HR	ALL	1ST	7042924
640742.39000	3667767.71000	1.77566	-50.90	-50.90	0.00	1-HR	ALL	1ST	9122423
640839.02000	3667769.28000	1.64712	-50.90	-50.90	0.00	1-HR	ALL	1ST	9122423
640935.66000	3667770.85000	1.57466	-50.60	-50.60	0.00	1-HR	ALL	1ST	10123121
641032.29000	3667772.42000	1.52175	-50.29	-50.29	0.00	1-HR	ALL	1ST	7082603
641128.93000	3667773.99000	1.50764	-50.29	-50.29	0.00	1-HR	ALL	1ST	12122704
641225.56000	3667775.56000	1.48936	-49.99	-49.99	0.00	1-HR	ALL	1ST	12122704
641322.20000	3667777.13000	1.48310	-49.97	-49.97	0.00	1-HR	ALL	1ST	12081804
641428.12000	3667028.76000	2.06524	-49.38	-49.38	0.00	1-HR	ALL	1ST	10112406
641429.69000	3666932.05000	2.00255	-49.68	-49.68	0.00	1-HR	ALL	1ST	12121921
641431.27000	3666835.35000	1.94198	-49.54	-49.54	0.00	1-HR	ALL	1ST	12121303
641432.84000	3666738.65000	1.88370	-49.38	-49.38	0.00	1-HR	ALL	1ST	12110519
641434.41000	3666641.95000	1.85894	-49.68	-49.68	0.00	1-HR	ALL	1ST	8121920
641435.99000	3666545.24000	1.91704	-49.68	-49.68	0.00	1-HR	ALL	1ST	12010905
641437.56000	3666448.54000	1.99342	-49.68	-49.68	0.00	1-HR	ALL	1ST	12022106
641439.13000	3666351.84000	2.09984	-49.68	-49.68	0.00	1-HR	ALL	1ST	12122221
641440.71000	3666255.14000	2.39662	-49.99	-49.99	0.00	1-HR	ALL	1ST	7030305
641493.32000	3667096.12000	1.99292	-49.38	-49.38	0.00	1-HR	ALL	1ST	10112406
641523.43000	3666933.58000	1.86885	-49.45	-49.45	0.00	1-HR	ALL	1ST	12121303
641525.00000	3666836.88000	1.81964	-49.38	-49.38	0.00	1-HR	ALL	1ST	9072005
641526.58000	3666740.17000	1.79069	-49.38	-49.38	0.00	1-HR	ALL	1ST	12030301
641528.15000	3666643.47000	1.77026	-49.38	-49.38	0.00	1-HR	ALL	1ST	7112506
641529.72000	3666546.77000	1.81001	-49.38	-49.38	0.00	1-HR	ALL	1ST	8010403
641531.30000	3666450.07000	1.87747	-49.67	-49.67	0.00	1-HR	ALL	1ST	12123121
641532.87000	3666353.36000	1.96824	-49.68	-49.68	0.00	1-HR	ALL	1ST	7012102
641534.45000	3666256.66000	2.25025	-49.99	-49.99	0.00	1-HR	ALL	1ST	12122221
641587.06000	3667097.64000	1.86976	-49.38	-49.38	0.00	1-HR	ALL	1ST	7122721
641463.27000	3667255.69000	1.92600	-49.68	-49.68	0.00	1-HR	ALL	1ST	9120921
641617.17000	3666935.10000	1.76304	-49.10	-49.10	0.00	1-HR	ALL	1ST	12121303
641618.74000	3666838.40000	1.72584	-49.07	-49.07	0.00	1-HR	ALL	1ST	9012218
641620.31000	3666741.70000	1.71097	-49.38	-49.38	0.00	1-HR	ALL	1ST	12122821
641621.89000	3666645.00000	1.69750	-49.38	-49.38	0.00	1-HR	ALL	1ST	12030302
641623.46000	3666548.29000	1.73171	-49.38	-49.38	0.00	1-HR	ALL	1ST	8121920
641625.04000	3666451.59000	1.78152	-49.38	-49.38	0.00	1-HR	ALL	1ST	8010403
641626.61000	3666354.89000	1.86363	-49.60	-49.60	0.00	1-HR	ALL	1ST	12010906
641628.18000	3666258.19000	2.13202	-49.68	-49.68	0.00	1-HR	ALL	1ST	7012102
641633.24000	3667208.89000	1.83500	-49.38	-49.38	0.00	1-HR	ALL	1ST	10112406
641417.26000	3667367.01000	1.79097	-49.68	-49.68	0.00	1-HR	ALL	1ST	10092420
641709.33000	3667033.33000	1.71547	-49.36	-49.36	0.00	1-HR	ALL	1ST	12121303
641710.90000	3666936.63000	1.67440	-49.07	-49.07	0.00	1-HR	ALL	1ST	9102619
641712.48000	3666839.93000	1.65646	-49.07	-49.07	0.00	1-HR	ALL	1ST	12030301
641714.05000	3666743.22000	1.63533	-49.07	-49.07	0.00	1-HR	ALL	1ST	12122821
641715.63000	3666646.52000	1.63452	-49.31	-49.31	0.00	1-HR	ALL	1ST	10112305
641717.20000	3666549.82000	1.66179	-49.38	-49.38	0.00	1-HR	ALL	1ST	12121923

641718.77000	3666453.12000	1.70019	-49.41	-49.41	0.00	1-HR	ALL	1ST	8010403
641720.35000	3666356.41000	1.77782	-49.68	-49.68	0.00	1-HR	ALL	1ST	10122303
641721.92000	3666259.71000	2.03780	-49.68	-49.68	0.00	1-HR	ALL	1ST	12122822
641767.40000	3667117.15000	1.68304	-49.07	-49.07	0.00	1-HR	ALL	1ST	12121303
641696.07000	3667281.74000	1.75702	-49.22	-49.22	0.00	1-HR	ALL	1ST	10112406
641576.99000	3667397.00000	1.76909	-49.38	-49.38	0.00	1-HR	ALL	1ST	9120921
641804.64000	3666938.15000	1.60049	-48.83	-48.83	0.00	1-HR	ALL	1ST	10110419
641806.22000	3666841.45000	1.59223	-49.07	-49.07	0.00	1-HR	ALL	1ST	9012724
641807.79000	3666744.75000	1.57896	-49.07	-49.07	0.00	1-HR	ALL	1ST	12020303
641809.36000	3666648.05000	1.57735	-49.07	-49.07	0.00	1-HR	ALL	1ST	12121804
641810.94000	3666551.34000	1.60049	-49.28	-49.28	0.00	1-HR	ALL	1ST	9120421
641812.51000	3666454.64000	1.63901	-49.64	-49.64	0.00	1-HR	ALL	1ST	8121920
641814.08000	3666357.94000	1.70366	-49.54	-49.54	0.00	1-HR	ALL	1ST	8010403
641815.66000	3666261.24000	1.95622	-49.53	-49.53	0.00	1-HR	ALL	1ST	12123121
641862.57000	3667115.38000	1.60386	-48.94	-48.94	0.00	1-HR	ALL	1ST	12121303
641794.09000	3667273.39000	1.68183	-49.07	-49.07	0.00	1-HR	ALL	1ST	7122721
641645.54000	3667463.04000	1.70257	-49.38	-49.38	0.00	1-HR	ALL	1ST	9120921
641485.39000	3667526.35000	1.65858	-49.68	-49.68	0.00	1-HR	ALL	1ST	10021419
641898.38000	3666939.68000	1.54555	-48.77	-48.77	0.00	1-HR	ALL	1ST	12030301
641899.95000	3666842.98000	1.53097	-48.77	-48.77	0.00	1-HR	ALL	1ST	12122821
641901.53000	3666746.28000	1.52430	-48.77	-48.77	0.00	1-HR	ALL	1ST	12121607
641903.10000	3666649.57000	1.52727	-49.05	-49.05	0.00	1-HR	ALL	1ST	12123120
641904.67000	3666552.87000	1.54497	-49.09	-49.09	0.00	1-HR	ALL	1ST	12030302
641906.25000	3666456.17000	1.57779	-49.38	-49.38	0.00	1-HR	ALL	1ST	12121923
641907.82000	3666359.47000	1.63418	-49.38	-49.38	0.00	1-HR	ALL	1ST	8010403
641909.40000	3666262.76000	1.88683	-49.38	-49.38	0.00	1-HR	ALL	1ST	12010905
641957.25000	3667114.72000	1.52726	-48.46	-48.46	0.00	1-HR	ALL	1ST	9020807
641890.68000	3667268.33000	1.59659	-48.77	-48.77	0.00	1-HR	ALL	1ST	12121921
641824.10000	3667421.94000	1.62206	-49.07	-49.07	0.00	1-HR	ALL	1ST	12081821
641712.96000	3667529.53000	1.63475	-49.07	-49.07	0.00	1-HR	ALL	1ST	9120921
641557.27000	3667591.07000	1.60770	-49.38	-49.38	0.00	1-HR	ALL	1ST	12090904
641992.12000	3666941.21000	1.49093	-48.65	-48.65	0.00	1-HR	ALL	1ST	9012724
641993.69000	3666844.50000	1.47769	-48.77	-48.77	0.00	1-HR	ALL	1ST	12020303
641995.26000	3666747.80000	1.47626	-48.77	-48.77	0.00	1-HR	ALL	1ST	12122019
641996.84000	3666651.10000	1.47905	-48.77	-48.77	0.00	1-HR	ALL	1ST	12030606
641998.41000	3666554.40000	1.49586	-49.07	-49.07	0.00	1-HR	ALL	1ST	10112305
641999.99000	3666457.69000	1.52439	-49.07	-49.07	0.00	1-HR	ALL	1ST	12121923
642001.56000	3666360.99000	1.57925	-49.07	-49.07	0.00	1-HR	ALL	1ST	8121920
642003.13000	3666264.29000	1.82440	-49.07	-49.07	0.00	1-HR	ALL	1ST	8010403
642008.19000	3667214.99000	1.51469	-48.49	-48.49	0.00	1-HR	ALL	1ST	12121303
641932.11000	3667390.55000	1.56021	-48.77	-48.77	0.00	1-HR	ALL	1ST	7122721
641678.08000	3667636.45000	1.57549	-49.38	-49.38	0.00	1-HR	ALL	1ST	12021505
641500.14000	3667706.79000	1.53892	-49.68	-49.68	0.00	1-HR	ALL	1ST	8122719
641411.17000	3667741.96000	1.51157	-49.68	-49.68	0.00	1-HR	ALL	1ST	10112307
642084.28000	3667039.43000	1.44771	-48.46	-48.46	0.00	1-HR	ALL	1ST	12030301
642085.85000	3666942.73000	1.43998	-48.46	-48.46	0.00	1-HR	ALL	1ST	12122821
642087.43000	3666846.03000	1.43299	-48.65	-48.65	0.00	1-HR	ALL	1ST	12020303

642089.00000	3666749.33000	1.43174	-48.77	-48.77	0.00	1-HR	ALL	1ST	10112306
642090.58000	3666652.62000	1.43631	-48.92	-48.92	0.00	1-HR	ALL	1ST	12030606
642092.15000	3666555.92000	1.45033	-49.07	-49.07	0.00	1-HR	ALL	1ST	12121007
642093.72000	3666459.22000	1.47572	-49.07	-49.07	0.00	1-HR	ALL	1ST	9120421
642095.30000	3666362.52000	1.52681	-48.97	-48.97	0.00	1-HR	ALL	1ST	8121920
642096.87000	3666265.81000	1.76300	-48.80	-48.80	0.00	1-HR	ALL	1ST	8010403
641348.53000	3666159.87000	2.20774	-50.04	-50.04	0.00	1-HR	ALL	1ST	12121201
641251.91000	3666158.26000	2.16608	-49.88	-49.88	0.00	1-HR	ALL	1ST	12011001
641155.30000	3666156.66000	2.14497	-50.29	-50.29	0.00	1-HR	ALL	1ST	12010405
641058.68000	3666155.05000	2.14767	-50.29	-50.29	0.00	1-HR	ALL	1ST	7020324
640962.06000	3666153.44000	2.18459	-50.58	-50.58	0.00	1-HR	ALL	1ST	12121924
640865.44000	3666151.83000	2.34582	-50.60	-50.60	0.00	1-HR	ALL	1ST	7012706
640768.83000	3666150.22000	2.55502	-50.90	-50.90	0.00	1-HR	ALL	1ST	7012007
640672.21000	3666148.61000	2.92588	-50.90	-50.90	0.00	1-HR	ALL	1ST	12011002
640575.59000	3666147.00000	3.47194	-51.15	-51.15	0.00	1-HR	ALL	1ST	9010706
641415.90000	3666094.68000	2.06886	-49.99	-49.99	0.00	1-HR	ALL	1ST	12121201
641253.47000	3666064.53000	1.96462	-50.36	-50.36	0.00	1-HR	ALL	1ST	9122521
641156.86000	3666062.92000	1.94855	-50.60	-50.60	0.00	1-HR	ALL	1ST	9121207
641060.24000	3666061.31000	1.94942	-50.43	-50.43	0.00	1-HR	ALL	1ST	7022505
640963.62000	3666059.70000	1.97218	-50.60	-50.60	0.00	1-HR	ALL	1ST	7012103
640867.00000	3666058.09000	2.07323	-50.63	-50.63	0.00	1-HR	ALL	1ST	12122220
640770.39000	3666056.48000	2.19257	-50.90	-50.90	0.00	1-HR	ALL	1ST	12012004
640673.77000	3666054.87000	2.47452	-51.01	-51.01	0.00	1-HR	ALL	1ST	12011002
640577.15000	3666053.27000	2.67210	-51.21	-51.21	0.00	1-HR	ALL	1ST	8011604
641417.47000	3666000.94000	1.91122	-49.99	-49.99	0.00	1-HR	ALL	1ST	12122605
641575.45000	3666124.75000	2.02126	-49.83	-49.83	0.00	1-HR	ALL	1ST	12020506
641255.03000	3665970.79000	1.83236	-50.35	-50.35	0.00	1-HR	ALL	1ST	12122202
641158.42000	3665969.18000	1.82001	-50.60	-50.60	0.00	1-HR	ALL	1ST	12111205
641061.80000	3665967.57000	1.81934	-50.68	-50.68	0.00	1-HR	ALL	1ST	12121924
640965.18000	3665965.96000	1.83336	-50.81	-50.81	0.00	1-HR	ALL	1ST	10123105
640868.56000	3665964.36000	1.89847	-50.90	-50.90	0.00	1-HR	ALL	1ST	9120402
640771.95000	3665962.75000	1.97093	-50.96	-50.96	0.00	1-HR	ALL	1ST	9121020
640675.33000	3665961.14000	2.17570	-51.21	-51.21	0.00	1-HR	ALL	1ST	7012405
640578.71000	3665959.53000	2.21994	-51.39	-51.39	0.00	1-HR	ALL	1ST	8011604
641528.71000	3665954.78000	1.86439	-49.99	-49.99	0.00	1-HR	ALL	1ST	9122723
641686.77000	3666170.76000	1.93849	-49.62	-49.62	0.00	1-HR	ALL	1ST	10020704
641353.21000	3665878.66000	1.74675	-50.29	-50.29	0.00	1-HR	ALL	1ST	12111204
641256.60000	3665877.05000	1.72795	-50.33	-50.33	0.00	1-HR	ALL	1ST	7020324
641159.98000	3665875.44000	1.71909	-50.60	-50.60	0.00	1-HR	ALL	1ST	10122507
641063.36000	3665873.84000	1.71747	-50.60	-50.60	0.00	1-HR	ALL	1ST	12032105
640966.74000	3665872.23000	1.72670	-50.90	-50.90	0.00	1-HR	ALL	1ST	12020305
640870.13000	3665870.62000	1.76482	-51.21	-51.21	0.00	1-HR	ALL	1ST	12012303
640773.51000	3665869.01000	1.81323	-51.22	-51.22	0.00	1-HR	ALL	1ST	12122220
640676.89000	3665867.40000	1.94801	-51.51	-51.51	0.00	1-HR	ALL	1ST	7012405
640580.27000	3665865.79000	1.91711	-51.72	-51.72	0.00	1-HR	ALL	1ST	8011604
641437.04000	3665820.61000	1.70476	-49.99	-49.99	0.00	1-HR	ALL	1ST	12010405
641601.57000	3665891.97000	1.78528	-49.68	-49.68	0.00	1-HR	ALL	1ST	12121201

641716.79000	3666011.05000	1.81257	-49.38	-49.38	0.00	1-HR	ALL	1ST	12020506
641258.16000	3665783.32000	1.64364	-50.31	-50.31	0.00	1-HR	ALL	1ST	12010702
641161.54000	3665781.71000	1.63546	-50.60	-50.60	0.00	1-HR	ALL	1ST	12011407
641064.92000	3665780.10000	1.63382	-50.60	-50.60	0.00	1-HR	ALL	1ST	7022506
640968.30000	3665778.49000	1.64063	-50.90	-50.90	0.00	1-HR	ALL	1ST	7011105
640871.69000	3665776.88000	1.66537	-51.19	-51.19	0.00	1-HR	ALL	1ST	12122002
640775.07000	3665775.27000	1.69924	-51.21	-51.21	0.00	1-HR	ALL	1ST	9120402
640678.45000	3665773.66000	1.74876	-51.51	-51.51	0.00	1-HR	ALL	1ST	10111604
640581.83000	3665772.05000	1.76327	-51.51	-51.51	0.00	1-HR	ALL	1ST	12012004
641435.31000	3665725.44000	1.61983	-49.99	-49.99	0.00	1-HR	ALL	1ST	12122202
641593.26000	3665793.95000	1.69341	-49.68	-49.68	0.00	1-HR	ALL	1ST	12122605
641782.85000	3665942.52000	1.72950	-49.38	-49.38	0.00	1-HR	ALL	1ST	12020506
641846.12000	3666102.64000	1.73141	-49.22	-49.22	0.00	1-HR	ALL	1ST	7012102
641259.72000	3665689.58000	1.57111	-50.30	-50.30	0.00	1-HR	ALL	1ST	10122507
641163.10000	3665687.97000	1.56448	-50.60	-50.60	0.00	1-HR	ALL	1ST	12032105
641066.48000	3665686.36000	1.56301	-50.60	-50.60	0.00	1-HR	ALL	1ST	7011102
640969.86000	3665684.75000	1.56871	-50.90	-50.90	0.00	1-HR	ALL	1ST	7122220
640873.25000	3665683.14000	1.58461	-51.18	-51.18	0.00	1-HR	ALL	1ST	10123105
640776.63000	3665681.54000	1.60885	-51.21	-51.21	0.00	1-HR	ALL	1ST	12012606
640680.01000	3665679.93000	1.63054	-51.51	-51.51	0.00	1-HR	ALL	1ST	12122220
640583.39000	3665678.32000	1.65724	-51.51	-51.51	0.00	1-HR	ALL	1ST	7010804
641434.68000	3665630.75000	1.54760	-49.99	-49.99	0.00	1-HR	ALL	1ST	7011720
641588.24000	3665697.36000	1.61081	-49.68	-49.68	0.00	1-HR	ALL	1ST	12032003
641741.80000	3665763.97000	1.64040	-49.38	-49.38	0.00	1-HR	ALL	1ST	10011007
641849.34000	3665875.11000	1.65354	-49.11	-49.11	0.00	1-HR	ALL	1ST	12123123
641910.86000	3666030.78000	1.65876	-49.07	-49.07	0.00	1-HR	ALL	1ST	12122122
641261.28000	3665595.84000	1.50797	-50.29	-50.29	0.00	1-HR	ALL	1ST	12011407
641164.66000	3665594.23000	1.50272	-50.60	-50.60	0.00	1-HR	ALL	1ST	9123003
641068.04000	3665592.62000	1.50170	-50.60	-50.60	0.00	1-HR	ALL	1ST	12111303
640971.43000	3665591.02000	1.50686	-50.90	-50.90	0.00	1-HR	ALL	1ST	7011620
640874.81000	3665589.41000	1.51708	-51.16	-51.16	0.00	1-HR	ALL	1ST	12122603
640778.19000	3665587.80000	1.53452	-51.21	-51.21	0.00	1-HR	ALL	1ST	7012103
640681.57000	3665586.19000	1.55041	-51.51	-51.51	0.00	1-HR	ALL	1ST	9120402
640584.96000	3665584.58000	1.57151	-51.51	-51.51	0.00	1-HR	ALL	1ST	12122507
641534.96000	3665579.84000	1.52117	-49.94	-49.94	0.00	1-HR	ALL	1ST	12111204
641710.46000	3665655.96000	1.56901	-49.38	-49.38	0.00	1-HR	ALL	1ST	12122605
641956.26000	3665909.99000	1.59615	-49.07	-49.07	0.00	1-HR	ALL	1ST	12010104
642026.57000	3666087.90000	1.59076	-49.07	-49.07	0.00	1-HR	ALL	1ST	12122822
642061.72000	3666176.86000	1.63268	-48.86	-48.86	0.00	1-HR	ALL	1ST	10122303
641359.46000	3665503.71000	1.45879	-49.99	-49.99	0.00	1-HR	ALL	1ST	10122507
641262.84000	3665502.11000	1.45220	-50.26	-50.26	0.00	1-HR	ALL	1ST	10120804
641166.22000	3665500.50000	1.44819	-50.56	-50.56	0.00	1-HR	ALL	1ST	7022506
641069.60000	3665498.89000	1.44768	-50.60	-50.60	0.00	1-HR	ALL	1ST	7012604
640972.99000	3665497.28000	1.45198	-50.90	-50.90	0.00	1-HR	ALL	1ST	7011620
640876.37000	3665495.67000	1.46152	-50.90	-50.90	0.00	1-HR	ALL	1ST	12020305
640779.75000	3665494.06000	1.47143	-51.21	-51.21	0.00	1-HR	ALL	1ST	12021807
640683.13000	3665492.45000	1.48326	-51.51	-51.51	0.00	1-HR	ALL	1ST	7012021

640586.52000	3665490.84000	1.49955	-51.51	-51.51	0.00	1-HR	ALL	1ST	12122220
640480.29000	3666239.20000	3.94206	-51.06	-51.06	0.00	1-HR	ALL	1ST	12020302
640478.70000	3666335.94000	3.76946	-51.12	-51.12	0.00	1-HR	ALL	1ST	12021806
640477.11000	3666432.68000	3.88479	-51.21	-51.21	0.00	1-HR	ALL	1ST	10011623
640475.52000	3666529.42000	3.74430	-51.26	-51.26	0.00	1-HR	ALL	1ST	9021105
640473.93000	3666626.16000	4.03342	-51.51	-51.51	0.00	1-HR	ALL	1ST	7021905
640472.34000	3666722.90000	3.31624	-51.51	-51.51	0.00	1-HR	ALL	1ST	7011420
640470.75000	3666819.65000	3.20994	-51.51	-51.51	0.00	1-HR	ALL	1ST	10011903
640469.15000	3666916.39000	3.15818	-51.51	-51.51	0.00	1-HR	ALL	1ST	8021219
640467.56000	3667013.13000	3.19439	-51.51	-51.51	0.00	1-HR	ALL	1ST	12012401
640415.11000	3666171.82000	2.93540	-51.21	-51.21	0.00	1-HR	ALL	1ST	12020302
640384.96000	3666334.40000	2.84872	-51.51	-51.51	0.00	1-HR	ALL	1ST	9120403
640383.37000	3666431.14000	2.80575	-51.51	-51.51	0.00	1-HR	ALL	1ST	9021105
640381.78000	3666527.88000	2.74898	-51.51	-51.51	0.00	1-HR	ALL	1ST	7012705
640380.19000	3666624.62000	2.81810	-51.51	-51.51	0.00	1-HR	ALL	1ST	8102519
640378.60000	3666721.36000	2.58745	-51.63	-51.63	0.00	1-HR	ALL	1ST	7011420
640377.01000	3666818.10000	2.52649	-51.78	-51.78	0.00	1-HR	ALL	1ST	10011903
640375.42000	3666914.85000	2.52958	-51.82	-51.82	0.00	1-HR	ALL	1ST	8121921
640321.37000	3666170.28000	2.66373	-51.28	-51.28	0.00	1-HR	ALL	1ST	12012323
640445.22000	3666012.24000	2.27433	-51.51	-51.51	0.00	1-HR	ALL	1ST	8122407
640291.23000	3666332.86000	2.45716	-51.51	-51.51	0.00	1-HR	ALL	1ST	9120403
640289.64000	3666429.60000	2.37908	-51.51	-51.51	0.00	1-HR	ALL	1ST	9021105
640288.04000	3666526.34000	2.32004	-51.64	-51.64	0.00	1-HR	ALL	1ST	9123005
640286.45000	3666623.08000	2.26322	-51.82	-51.82	0.00	1-HR	ALL	1ST	7120604
640284.86000	3666719.82000	2.23221	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011405
640283.27000	3666816.56000	2.22119	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011420
640281.68000	3666913.30000	2.21972	-51.82	-51.82	0.00	1-HR	ALL	1ST	10011903
640280.09000	3667010.04000	2.23600	-51.82	-51.82	0.00	1-HR	ALL	1ST	8121921
640275.22000	3666059.01000	2.21233	-51.51	-51.51	0.00	1-HR	ALL	1ST	12020302
640491.28000	3665900.94000	1.98583	-51.75	-51.75	0.00	1-HR	ALL	1ST	12122224
640199.08000	3666234.57000	3.06085	-51.21	-51.21	0.00	1-HR	ALL	1ST	9120403
640197.49000	3666331.31000	2.24123	-51.51	-51.51	0.00	1-HR	ALL	1ST	9021105
640195.90000	3666428.06000	2.13348	-51.51	-51.51	0.00	1-HR	ALL	1ST	7012705
640194.31000	3666524.80000	2.07702	-51.51	-51.51	0.00	1-HR	ALL	1ST	12030605
640192.72000	3666621.54000	2.04046	-51.51	-51.51	0.00	1-HR	ALL	1ST	12121024
640191.12000	3666718.28000	2.02891	-51.51	-51.51	0.00	1-HR	ALL	1ST	7011405
640189.53000	3666815.02000	2.01751	-51.72	-51.72	0.00	1-HR	ALL	1ST	7011420
640187.94000	3666911.76000	2.01215	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011420
640186.35000	3667008.50000	2.03609	-51.82	-51.82	0.00	1-HR	ALL	1ST	10011903
640141.03000	3666150.73000	2.23018	-51.51	-51.51	0.00	1-HR	ALL	1ST	9120403
640212.41000	3665986.14000	2.02585	-51.53	-51.53	0.00	1-HR	ALL	1ST	12020302
640331.54000	3665870.90000	1.93807	-52.11	-52.11	0.00	1-HR	ALL	1ST	8122407
640103.75000	3666329.77000	2.08801	-51.51	-51.51	0.00	1-HR	ALL	1ST	9021105
640102.16000	3666426.51000	1.97302	-51.51	-51.51	0.00	1-HR	ALL	1ST	9123005
640100.57000	3666523.25000	1.91895	-51.51	-51.51	0.00	1-HR	ALL	1ST	12030605
640098.98000	3666620.00000	1.87850	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011421
640097.39000	3666716.74000	1.87016	-51.82	-51.82	0.00	1-HR	ALL	1ST	7020807

640095.80000	3666813.48000	1.86373	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011405
640094.20000	3666910.22000	1.87461	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011420
640045.87000	3666152.48000	2.10702	-51.66	-51.66	0.00	1-HR	ALL	1ST	9120403
640114.39000	3665994.47000	1.92279	-51.82	-51.82	0.00	1-HR	ALL	1ST	12012323
640263.01000	3665804.84000	1.82888	-52.12	-52.12	0.00	1-HR	ALL	1ST	8122407
640423.20000	3665741.58000	1.76145	-51.82	-51.82	0.00	1-HR	ALL	1ST	12032106
640010.01000	3666328.23000	1.96854	-51.82	-51.82	0.00	1-HR	ALL	1ST	7012705
640008.42000	3666424.97000	1.84359	-51.79	-51.79	0.00	1-HR	ALL	1ST	9123005
640006.83000	3666521.71000	1.79435	-51.82	-51.82	0.00	1-HR	ALL	1ST	7020806
640005.24000	3666618.45000	1.76596	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011421
640003.65000	3666715.20000	1.75608	-51.82	-51.82	0.00	1-HR	ALL	1ST	12121606
640002.06000	3666811.94000	1.75455	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011405
640000.47000	3666908.68000	1.75723	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011420
639998.88000	3667005.42000	1.76268	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011420
639951.18000	3666153.14000	2.01041	-51.82	-51.82	0.00	1-HR	ALL	1ST	9021105
640017.80000	3665999.52000	1.82867	-51.94	-51.94	0.00	1-HR	ALL	1ST	9120603
640084.42000	3665845.90000	1.75835	-52.12	-52.12	0.00	1-HR	ALL	1ST	12030520
640195.60000	3665738.34000	1.73673	-51.88	-51.88	0.00	1-HR	ALL	1ST	8122407
640351.34000	3665676.83000	1.68505	-51.91	-51.91	0.00	1-HR	ALL	1ST	7020520
639916.28000	3666326.69000	1.87946	-51.82	-51.82	0.00	1-HR	ALL	1ST	9123005
639914.69000	3666423.43000	1.75352	-51.82	-51.82	0.00	1-HR	ALL	1ST	12030605
639913.10000	3666520.17000	1.70276	-51.82	-51.82	0.00	1-HR	ALL	1ST	7020806
639911.50000	3666616.91000	1.67603	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011421
639909.91000	3666713.65000	1.66460	-51.82	-51.82	0.00	1-HR	ALL	1ST	12121024
639908.32000	3666810.39000	1.66286	-51.82	-51.82	0.00	1-HR	ALL	1ST	7012020
639906.73000	3666907.14000	1.65244	-52.12	-52.12	0.00	1-HR	ALL	1ST	7011405
639900.27000	3666052.84000	1.75866	-52.12	-52.12	0.00	1-HR	ALL	1ST	9120403
639976.41000	3665877.27000	1.70248	-52.36	-52.36	0.00	1-HR	ALL	1ST	9122422
640230.54000	3665631.42000	1.64004	-52.12	-52.12	0.00	1-HR	ALL	1ST	7121321
640408.53000	3665561.13000	1.58108	-51.82	-51.82	0.00	1-HR	ALL	1ST	10112720
640497.52000	3665525.99000	1.53937	-51.73	-51.73	0.00	1-HR	ALL	1ST	7010804
639824.13000	3666228.41000	2.50841	-52.12	-52.12	0.00	1-HR	ALL	1ST	7012705
639822.54000	3666325.15000	1.79667	-52.02	-52.02	0.00	1-HR	ALL	1ST	9123005
639820.95000	3666421.89000	1.67675	-51.82	-51.82	0.00	1-HR	ALL	1ST	12030605
639819.36000	3666518.63000	1.62504	-51.82	-51.82	0.00	1-HR	ALL	1ST	10112721
639817.77000	3666615.37000	1.60037	-51.82	-51.82	0.00	1-HR	ALL	1ST	7011421
639816.18000	3666712.11000	1.58812	-51.86	-51.86	0.00	1-HR	ALL	1ST	12121024
639814.58000	3666808.85000	1.58009	-52.12	-52.12	0.00	1-HR	ALL	1ST	7020807
639812.99000	3666905.59000	1.57999	-52.12	-52.12	0.00	1-HR	ALL	1ST	7011405
639811.40000	3667002.34000	1.58621	-52.12	-52.12	0.00	1-HR	ALL	1ST	7011420
640574.03000	3666240.74000	5.90471	-50.90	-50.90	0.00	1-HR	ALL	1ST	9122506
640561.30000	3667014.67000	5.48162	-51.27	-51.27	0.00	1-HR	ALL	1ST	7012707
641334.38000	3667027.23000	2.22982	-49.42	-49.42	0.00	1-HR	ALL	1ST	12011118
641346.97000	3666253.61000	2.55415	-49.68	-49.68	0.00	1-HR	ALL	1ST	12111302

** CONCUNIT ug/m^3
** DEPUNIT g/m^2

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ATTACHMENT 2

Traffic Impact Analysis

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engineers

TRAFFIC IMPACT ANALYSIS

BLAIR RANCH PROJECT

Calipatria, California

November 8, 2019

LLG Ref. 3-19-3167

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APPENDIX

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TRANSPORTATION IMPACT ANALYSIS

BLAIR RANCH PROJECT

Calipatria, California
November 8, 2019

1.0 INTRODUCTION

It is proposed amend the existing CUP at the hay processing and storage facility known as the Blair Ranch Project, to address non-compliance issues which include exceeding the permitted quantities of the various activities at the site. This study will address any potential impacts along the truck routes where the increased activity could impact the transportation system, including intersections and segments. The following sections are included in this report:

- Project Description
- Existing Conditions
- Study Area, Analysis Scenarios, Approach and Methodology
- Significance Criteria
- Analysis of Existing Conditions
- Cumulative Projects
- Trip Generation/Distribution/Assignment
- Analysis of Near-Term Scenarios
- Site Access Discussion
- Conclusions

2.0 PROJECT DESCRIPTION

2.1 Project Location

Fondomonte California, LLC, a Delaware Limited Liability Company (hereafter "Fondomonte"), is proposing to amend its existing Conditional Use Permit (CUP) #16-0017 (recorded November 7, 2016) for the hay processing and storage facility known as Blair Ranch Site 1 (BRS1). The facility is located at 6456 Blair Road, Calipatria in unincorporated Imperial County. The western boundary of the parcel is approximately one-half mile from the eastern city limit of Calipatria. BRS1 is bordered by Young Road on the north, State Route 115 on the south, County Road 8113 on the east and Blair Road on the west.

Figure 1-1 depicts the Project location.

Fondomonte is amending the existing CUP to address non-compliance issues which include exceeding the permitted quantities of the following: the amount of raw hay stored on site; the number of truck round-trips to the site; the number of container truck trips going out of the site; the number of employee round trips; and the number of employees working at the facility.

2.2 Project Description

2.2.1 *Existing Facilities*

The existing hay press occupies approximately 24 acres of the 160-acre parcel. The remainder of the parcel is devoted to hay storage, administration and ancillary buildings, and infrastructure. A separate hay storage yard known as Blair Ranch Site 2 (BRS2) is located one mile to the north at 6850 Blair Road. BRS2 (commonly referred to as the "Stack Yard") has 51 raw product storage barns with a capacity of 76,500 standard tons.

Fondomonte grows forage crops in, and purchases forage products from, the northern and southern Imperial Valley (in Imperial County), the Palo Verde Valley (Blythe, next to the eastern border of Southern California with Arizona) and Arizona (Poston and Yuma). The product is stored at both BRS1 and BRS2 until it is ready to be pressed.

BRS1 is completely surrounded by an 8-foot high chain-link fence topped with three-strand barbed wire. The facility has 14 barns used to store raw hay. The barns are located in the northern half of the parcel and can accommodate storage of 21,000 standard tons of raw product. Adequate room is available for an additional 7 barns or open-air stacks in an approximately 40-acre area in the southeastern corner of the parcel. Approximately 12,000 additional standard tons of raw product can be stored in this area.

In addition to the existing barns and press operation, BRS1 also includes administrative facilities in the southwest corner of the parcel with a 1,458 square foot canteen building and 1,458 SF office building. On-site parking is also available for employees and visitors.

Other on-site buildings include the pressed hay building, staging hay building, two (2) finished hay buildings, a shop building and restroom facility.

On-site ancillary facilities include two concrete docks, two (2) 136-foot long by 14-feet wide scales (one in-bound and one out-bound), a 100,000 gallon fire water tank, one (1) 10,000 gallon dual wall diesel gas tank, a 2,000 gallon unleaded gas tank, a 4-inch concrete roll-over berm containment area, a pump and concrete pad, a fill riser, and chaff containment area. No new or expanded buildings or infrastructure is proposed as part of the amended CUP.

Figure 2-2 depicts the Project site and ***Figure 2-3*** is a facilities map.

2.2.2 *Staffing and Hours of Operation*

Under the existing CUP, BRS1 is entitled to employ 49 staff members. Currently, the number of employees is 96. The existing day shift (4:00 a.m. to 3:00 p.m.) totals up to 80 employees and the night shift totals 16 staff members (3:30 p.m. to 3:00 a.m.). Night shift staff only operate the press and provide security. The office, scale and yard are only staffed during daylight hours 7:00 a.m. to 5:00 p.m. The facility is permitted to operate 24-hours a day, 7 days a week.

Table 2-1 summarizes the number of employees by shift and by activity.

TABLE 2-1
NUMBER OF EMPLOYEES BY SHIFT AND ACTIVITY

Description	Number of Employees
Press	
5am-3 pm	21 employees
4pm- 2 am	7 employees
Office 8 am-5pm	8 employees
Scale 6 am – 2 pm	4 employees
Security	
6 am – 2 pm	3 employees
2 pm – 10pm	2 employees
10 pm- 6 am	2 employees
Shop 6 am -3 pm	6 employees
Yard 6 am -3 pm	11 employees
*AAG Rail Spur/Drivers: 6 am -3 pm	11 employees

2.2.3 *Production*

BRS1 is permitted to store 75,000 standard tons of unprocessed forage product. The facility currently operates six days per week, sixteen hours per day but is permitted to operate 24-hours a day, 7 days a week. Fondomonte is proposing to amend its CUP to store 110,000 standard tons of unprocessed forage product such as alfalfa, Bermuda Grass and Sudan grass. The amount of daily product processed per day is 1,100 standard tons with a total of 400,000 standard tons processed annually.

2.2.4 *Trucking*

Raw product and finished hay bales are trucked in and out of BRS1 on a daily basis. Inbound raw product comes from the Imperial Valley, Palo Verde Valley and surrounding areas. Trucks use SR 115 as well as Blair Road, a County road. Access to BRS1 is provided via a driveway along Blair Road south of Young Road and north of State Route 115. The driveway provides one in-bound and one out-bound lane and is controlled by a stop sign at the westbound approach. Trucks travel along SR 115 then turn north on Blair Road from both the east and west. Truck deliveries generally occur from 6:00 AM to 6:00 PM, Monday through Saturday.

Upon entering the site, trucks pull up to the scale to be weighed. The trucks then pull into the yard to be unloaded. All hay from the Fondomonte farm in Blythe is delivered to BRS1. All hay purchased from outside sources is weighed and unloaded at BRS2. Almost all of the trucks are owned and operated by Fondomonte with a few independent sub-haulers. The existing CUP allows for 60 inbound trucks. As part of the amended CUP, Fondomonte is proposing 100 inbound trucks per day during the peak season, April 31 through August 31.

Outbound truck routes have been revised as compared to the current CUP. Currently, outbound trucks hauling pressed hay went to the Port of Long Beach for shipment overseas. Beginning in September 2017, transport transitioned from truck to rail. BRS1 shipping has now completely converted to rail to transport out-bound pressed hay to the Port of Long Beach. Pressed hay is trucked approximately 2 miles southwest to the rail spur at the All American Grain (AAG) facility located at 305 Yocum Road, Calipatria. Fondomonte leases the rail spur from AAG. Trucks travel south approximately one-quarter mile on Blair Road to State Route 115, then turn south on Brown Road through the City of Calipatria for one mile to Yocum Road. Once on Yocum Road, the trucks travel one-quarter west then turn south into the AAG facility.

BRS1 is currently entitled for 50 outbound truck trips. Fondomonte is proposing 60 outbound trips per day during the peak season, April 31 through August 31.

Figure 2-4 depicts the various truck routes to haul in raw product to the site and haul out finished products from the site.

2.2.5 *Site Access*

Two points of ingress/egress are available to access BRS1. The main access located approximately 1,200 feet north of SR 115 is a commercial driveway along Blair Road which extends east into the facility leading to the Guard House. Traffic heading north or south along Blair Road can turn right or left into the facility. A second access off Blair Road is located south of the main access, approximately 450 feet north of SR 115 and provides a right-turn in only into the site.

2.3 Existing and Proposed Activities

Table 2-2 below summarizes existing activity compared to what is being proposed in association with the amended CUP.

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TABLE 2-2
APPROVED AND PROPOSED PROJECT ACTIVITIES

Description	16-0017 Existing CUP Entitlements	19-xxxx Proposed Entitlements	Notes
Hay Pressed (Tons/Day)	1100	1100 st/1000 mt	
Presses	2	2	
Raw Hay Stored Onsite	75,000	110,000 st/100,000 mt	
Annual Raw Hay Processed	400,000	400,000	No More than 312,000 mt are processed annually: 1100 st/1000 mt per day/ 6 days a week/ 52 weeks a year
Double Trailer Truck Round Trips To Site	60	100	Considering seasonal volumes, there will be 100 trucks round trips max per day, 6 days a week through peak season 4/31 - 8/31. The remainder of the year max will be 60 per day, 6 days a week. There could be Sunday deliveries, but this could be unlikely for the foreseeable future. Daily truck round trips between Site 1 & 2 will be consistent throughout the year at max 60 per day. Hourly movements are based on a 10-hour workday.
Container Truck Trips Out	50	60	Once the bridge is in place at the AAG rail the maximum daily truck round trips to the AAG rail will be 60. However, it will be closer to 50 per day since this activity will no longer be limited to the current 3 days per week to load and deliver containers to the rail. This is tentatively scheduled to be in place before the end of 2019. The maximum hourly movements is based on a 1-hour workday for truck container movements
Employee Round Trips	49	100	Based on a total employment of 100
Dust Collector	12,000 cfm		
Working Hours	24 hrs	24 hrs	
Employees	49	100	It is assumed that the number of employees between the stack yard and press site is 100. However, the maximum number of employees is closer to 95.

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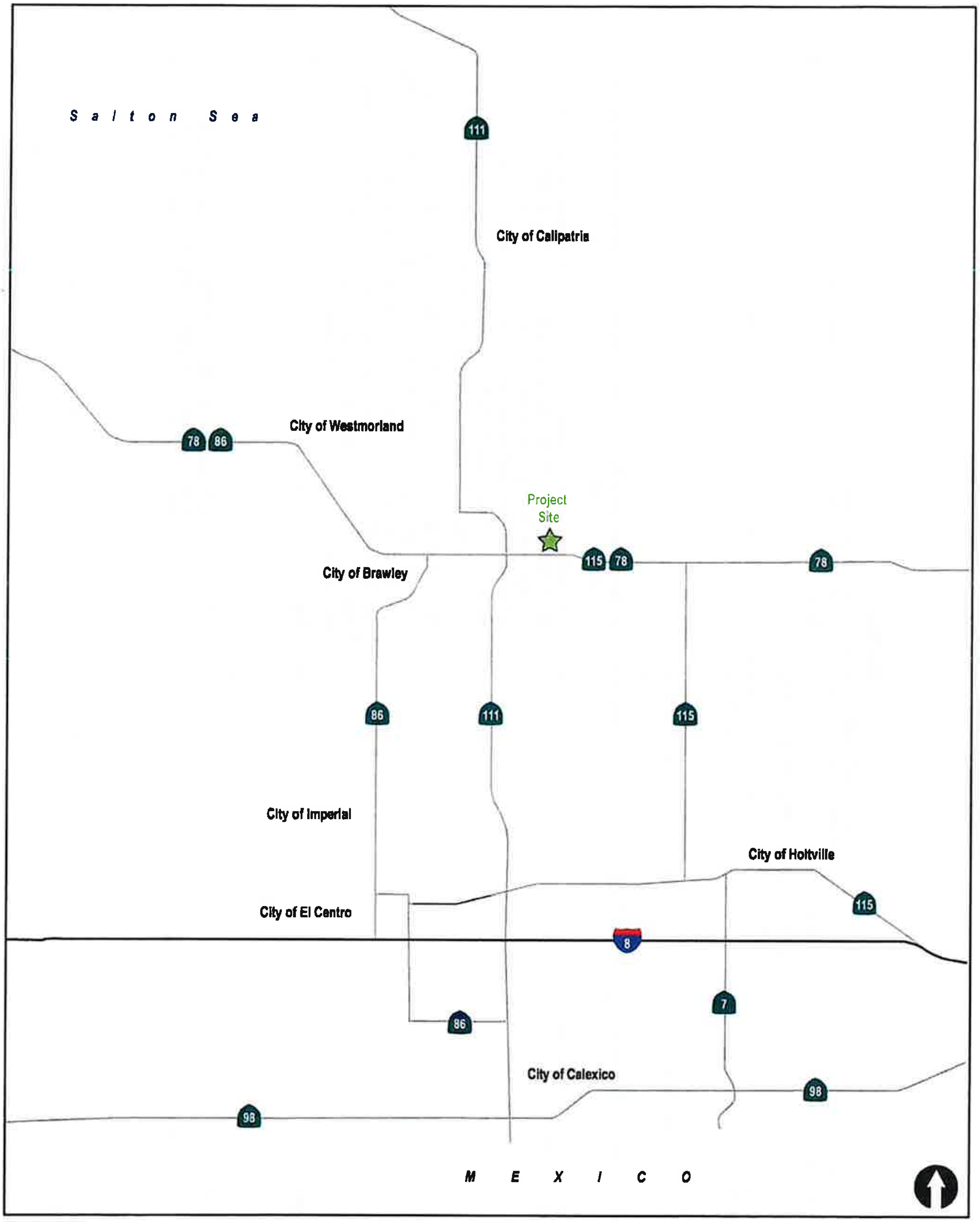

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Figure 2-1

Project Location

BLAIR RANCH PROJECT

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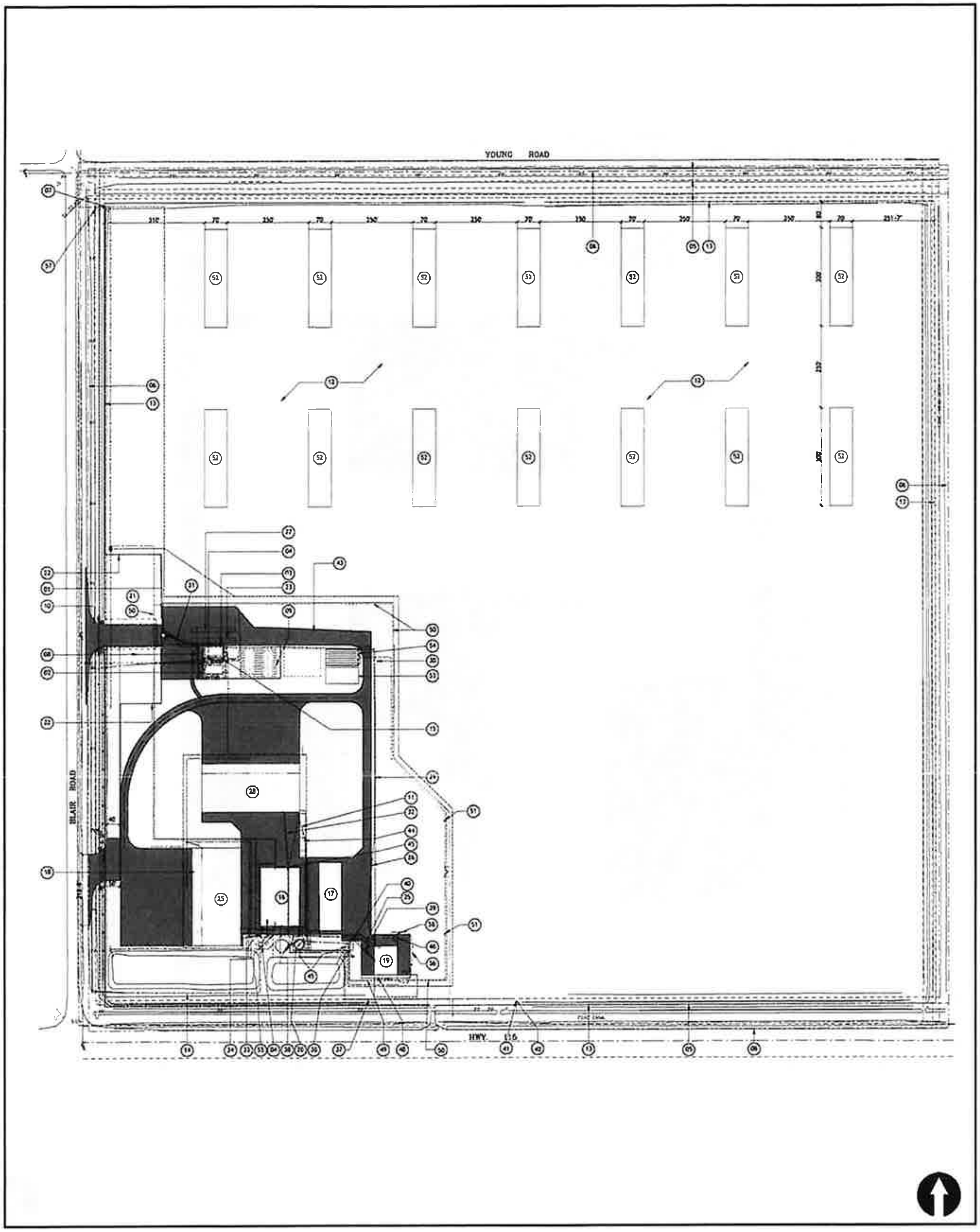

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Figure 2-2

Site Plan

BLAIR RANCH PROJECT

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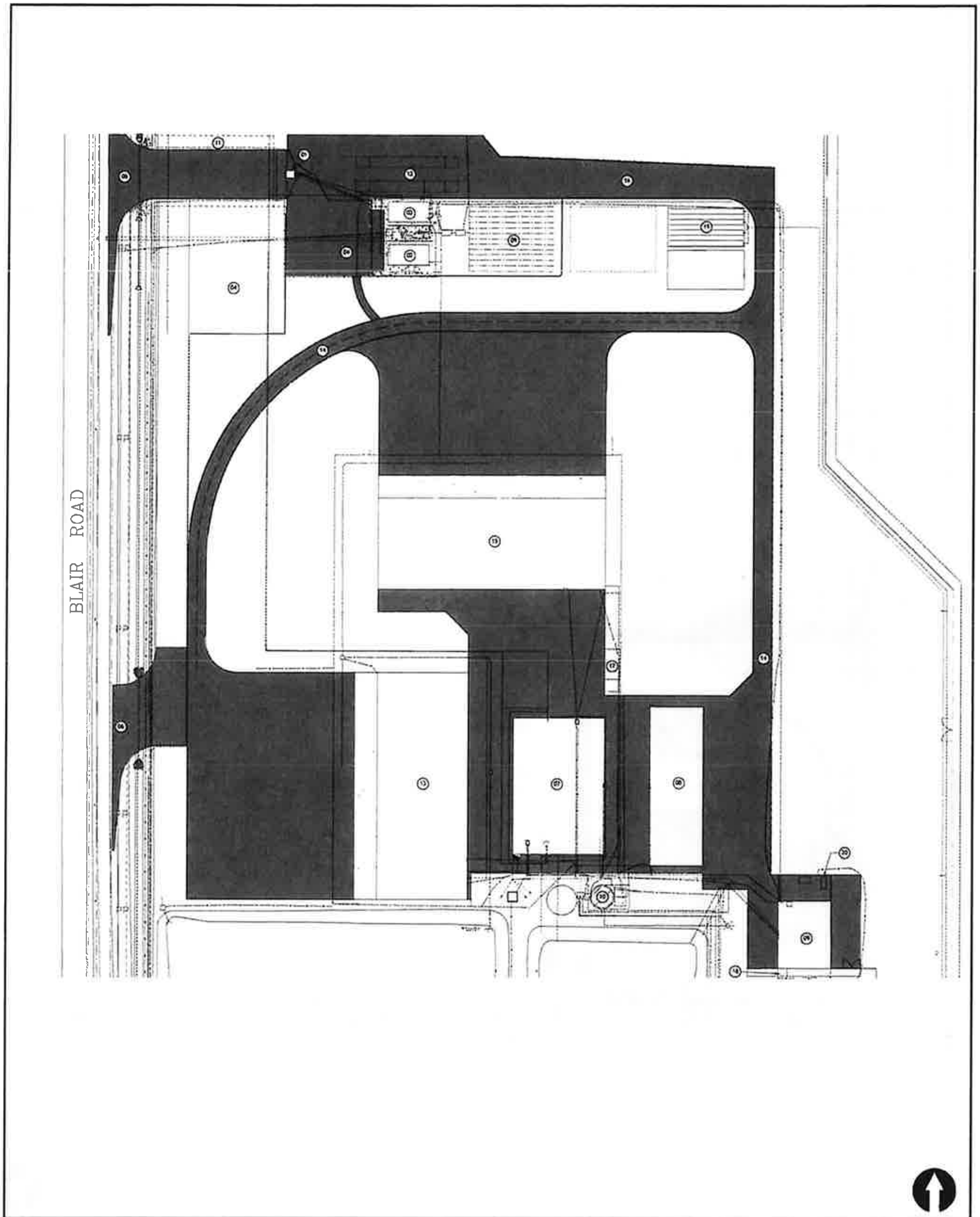

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Figure 2-3

Facilities Map

BLAIR RANCH PROJECT

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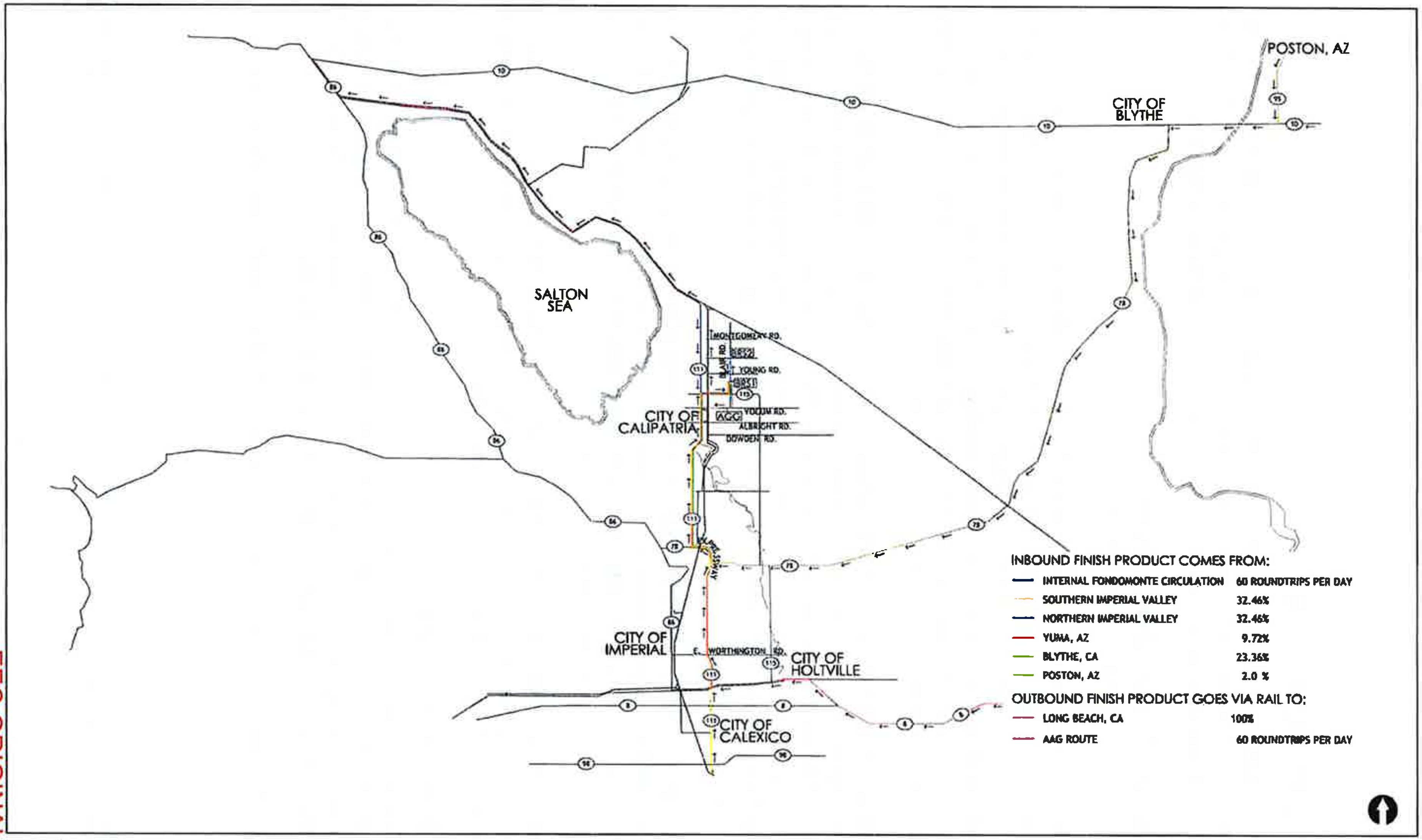

Figure 2-4

Truck Routes

BLAIR RANCH PROJECT

3.0 EXISTING CONDITIONS

Effective evaluation of the potential traffic impacts associated with the proposed Project requires an understanding of the existing transportation system within the study area. ***Figure 3–1*** shows an existing conditions diagram, including intersection control types and lane configurations.

3.1 Existing Transportation Conditions

The following is a brief description of the major streets in the project area.

Blair Road is classified as a Major Collector (Collector) north of State Route 115 and as a Minor Collector (Local Collector) south of State Route 115 per the County of Imperial Circulation Element. Blair Road south of SR-115 is currently an unpaved gravel road. Blair Road is currently constructed as a north-south two-lane undivided roadway providing one lane of travel in each direction. No bike lanes or bus stops are provided, and parking is generally prohibited within the project area. There is no posted speed limit on the road within the study area.

State Route 115 (SR-115), is a Caltrans facility, serving as an alternate to both SR-86 and SR-111. It is an east-west two-lane undivided state highway within the study area and per the County of Imperial Circulation Element is classified as a Major Collector. SR-115 is important in facilitating interregional agricultural goods movement and also provides intraregional travel between various cities within Imperial County. The posted speed limit is 45 mph. Curbside parking is prohibited along the highway. No bicycle facilities currently exist.

Young Road is classified as a Minor Collector on the County of Imperial Circulation Element. Young Road is currently an unpaved gravel road constructed as an east-west two-lane undivided roadway providing one lane of travel in each direction. No bike lanes or bus stops are provided. There is no posted speed limit on the road within the study area.

Lindsey Road is currently an unpaved gravel road constructed as an east-west two-lane undivided roadway providing one lane of travel per direction. No bike lanes or bus stops are provided and there is no posted speed limit on the road within the study area.

3.2 Existing Traffic Volumes

Table 3–1 is a summary of the most recent available average daily traffic (ADT) volumes from LLG counts on October 10, 2019, when area schools were in session. Manual hand counts at the study area intersections, including bicycle and pedestrian counts, were also conducted on October 10, 2019. The ADT counts on SR 115 were obtained from the Traffic Census, Caltrans.

Figure 3–2 shows the Existing Traffic Volumes. ***Appendix A*** contains the manual count sheets.

Table 3–1
Existing Traffic Volumes

Street Segment	Date	Source	ADT[a]
Blair Road			
Lindsey Rd to SR 115	October 10, 2019	LLG Engineers	2,300
SR 115			
Industrial Rd to Blair Rd	2017	Caltrans	1,900

Footnotes:

a. Average Daily Traffic Volumes.

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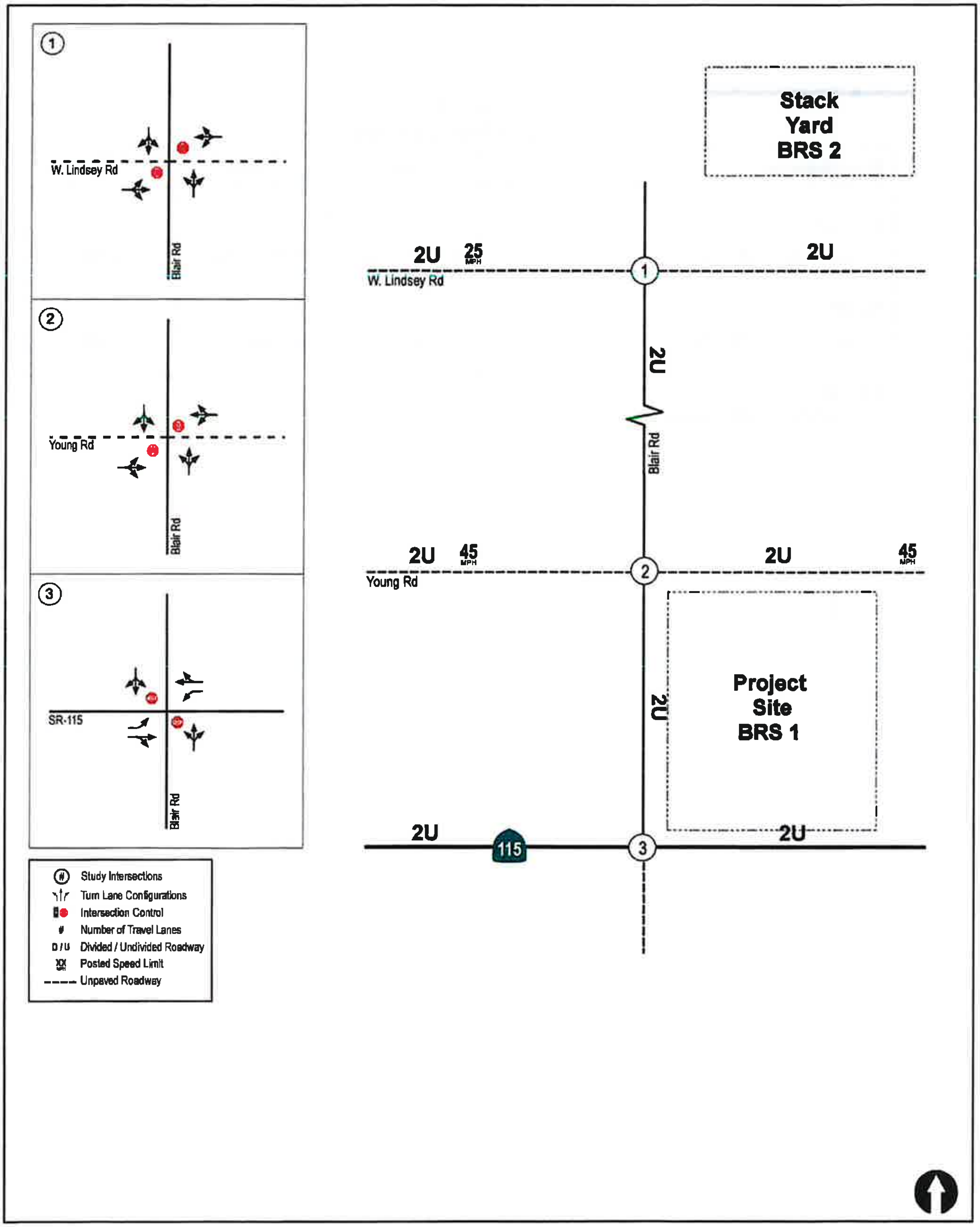

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Figure 3-1

Existing Conditions Diagram

BLAIR RANCH PROJECT

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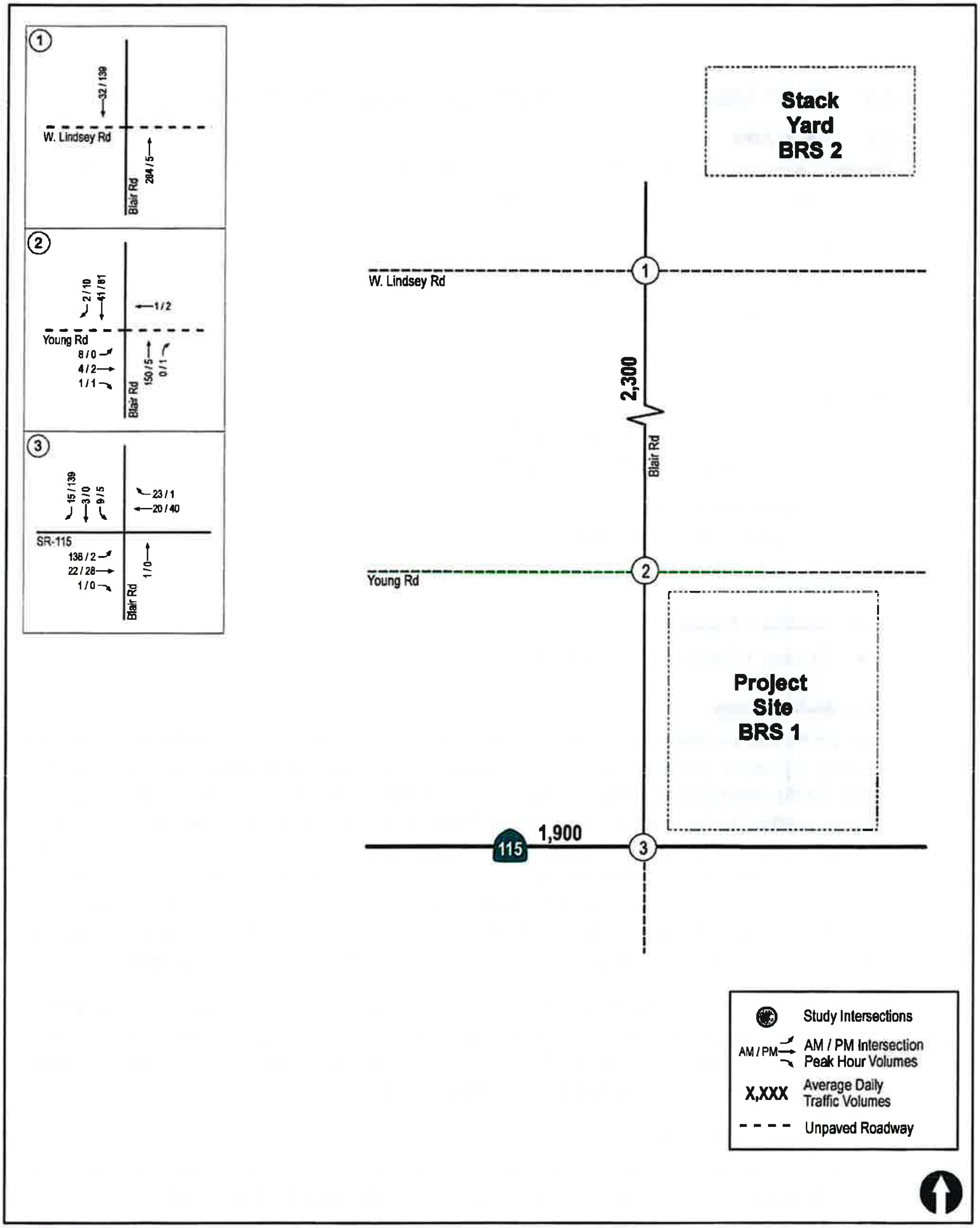

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Figure 3-2

Existing Traffic Volumes

Blair Ranch

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4.0 STUDY AREA, ANALYSIS SCENARIOS, APPROACH AND METHODOLOGY

4.1 Study Area

The study area was determined based on the truck routes and the facilities where the project is likely to have impacts, and includes the following intersections and segments:

Intersections

1. Blair Road / W. Lindsey Road
2. Blair Road / Young Road
3. Blair Road / State Route 115

Segments

A. Blair Road: Lindsey Road to SR 115
B. SR 115: Industrial Road to Blair Road

4.2 Analysis Scenarios

The following scenarios will be analyzed:

- Existing
- Existing + Project
- Existing + Project + Cumulative Projects

4.3 Methodology

There are various methodologies used to analyze signalized intersections, unsignalized intersections and street segments. The measure of effectiveness for intersection and segment operations is level of service (LOS) which denotes the operating conditions which occur at a given intersection or on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst. LOS designation is reported differently for signalized and unsignalized intersections, as well as for roadway segments.

In the Highway Capacity Manual (HCM) 6th Edition, LOS for signalized intersections is defined in terms of delay. The LOS analysis provides results in seconds of delay expressed in terms of letters A through F. Delay is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. ***Table 4–1*** summarizes the signalized intersections levels of service descriptions.

4.3.1 *Signalized Intersections*

Table 4–2 depicts the criteria, which are based on the average control delay for any particular minor movement (unsignalized intersections) and overall intersection (signalized intersections).

For signalized intersections, LOS criteria is stated in terms of the average control delay per vehicle for a 15-minute analysis period. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay.

LOS A describes operations with very low delay, (i.e. less than 10.0 seconds per vehicle). This occurs when progression is extremely favorable, and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.

LOS B describes operations with delay in the range 10.1 seconds and 20.0 seconds per vehicle. This generally occurs with good progression and/or short cycle lengths. More vehicles stop than for LOS A, causing higher levels of Average delay.

LOS C describes operations with delay in the range 20.1 seconds and 35.0 seconds per vehicle. These higher delays may result from fair progression and/or longer cycle lengths. Individual cycle failures may begin to appear. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping.

LOS D describes operations with delay in the range 35.1 seconds and 55.0 seconds per vehicle. At level D, the influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or higher v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are frequent.

LOS E describes operations with delay in the range of 55.1 seconds to 80.0 seconds per vehicle. This is considered to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences.

LOS F describes operations with delay in excess of over 80.0 seconds per vehicle. This is considered to be unacceptable to most drivers. This condition often occurs with over-saturation (i.e., when arrival flow rates exceed the capacity of the intersection). It may also occur at high v/c ratios below 1.00 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing causes to such delay levels.

There are no signalized intersections in the Project study area.

4.3.2 *Unsignalized Intersections*

For unsignalized intersections, LOS is determined by the computed or measured control delay and is defined for each minor movement. For All-Way-Stop-controlled (AWSC) intersections, the overall intersection delay is reported. For two-way-stop-controlled (TWSC) intersections, LOS is not defined for the intersection as a whole, but the worst-case movement (typically the minor street left-turn) delay and LOS are reported.

TABLE 4–1
INTERSECTION LEVEL OF SERVICE DESCRIPTIONS

LOS	Description
A	Occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.
B	Generally occurs with good progression and/or short cycle lengths. More vehicles stop than for LOS A, causing higher levels of average delay.
C	Generally results when there is fair progression and/or longer cycle lengths. Individual cycle failures may begin to appear in this level. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping.
D	Generally results in noticeable congestion. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high volume-to-capacity ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.
E	Considered to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high volume-to-capacity ratios. Individual cycle failures are frequent occurrences.
F	Considered to be unacceptable to most drivers. This condition often occurs with over saturation i.e. when arrival flow rates exceed the capacity of the intersection. It may also occur at high volume-to-capacity ratios below 1.00 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing causes to such delay levels

TABLE 4–2
INTERSECTION LEVEL OF SERVICE (LOS) & DELAY RANGES

LOS	Delay (seconds/vehicle)	
	Signalized Intersections	Unsignalized Intersections
A	≤ 10.0	≤ 10.0
B	10.1 to 20.0	10.1 to 15.0
C	20.1 to 35.0	15.1 to 25.0
D	35.1 to 55.0	25.1 to 35.0
E	55.1 to 80.0	35.1 to 50.0
F	≥ 80.1	≥ 50.1

Source: Highway Capacity Manual 6th Edition

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LOS F exists when there are insufficient gaps of suitable size to allow a side street demand to safely cross through a major street traffic stream. This LOS is generally evident from extremely long control delays experienced by side-street traffic and by queuing on the minor-street approaches. The method, however, is based on a constant critical gap size; that is, the critical gap remains constant no matter how long the side-street motorist waits.

LOS F may also appear in the form of side-street vehicles selecting smaller-than-usual gaps. In such cases, safety may be a problem, and some disruption to the major traffic stream may result. It is important to note that LOS F may not always result in long queues but may result in adjustments to normal gap acceptance behavior, which are more difficult to observe in the field than queuing.

4.3.3 *Street Segments*

Street segment analysis is based upon the comparison of daily traffic volumes (ADTs) to the Imperial County Standard Street Classification table (***Table 4-3***). This table provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics.

TABLE 4-3
IMPERIAL COUNTY STANDARD STREET CLASSIFICATION
AVERAGE DAILY VEHICLE TRIPS

ROAD		LEVEL OF SERVICE				
CLASS	X-SECTION	A	B	C	D	E
Expressway	154/210	30,000	42,000	60,000	70,000	80,000
Prime Arterial	106/136	22,200	37,000	44,600	50,000	57,000
Minor Arterial	82/102	14,800	24,700	29,600	33,400	37,000
Collector	64/84	13,700	22,800	27,400	30,800	34,200
Local Collector	40/70	1,900	4,100	7,100	10,900	16,200
Residential Street	40/60	*	*	<1,500	*	*
Residential Cul-de-Sac / Loop Street	40/60	*	*	< 200	*	*
Industrial Collector	76/96	5,000	10,000	14,000	17,000	20,000
Industrial Local Street	44/64	2,500	5,000	7,000	8,500	10,000

* Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

5.0 SIGNIFICANCE CRITERIA

The significance criteria summarized in ***Table 5–1*** developed by Linscott, Law and Greenspan, Engineers is based upon the City of El Centro and the County of Imperial's goal for intersections and roadway segments to operate at LOS C or better.

In general, a LOS C or better facility that degrades to a LOS D or worse is considered a significant direct impact. A cumulative impact can occur if the intersection or segment level of service is already operating below City / County standards and the project increases the delay by more than 2 seconds or the v/c ratio by more than 0.02.

TABLE 5-1
SIGNIFICANCE CRITERIA

Existing	Existing + Project	Existing + Project + Cumulative Projects	Impact Type
INTERSECTIONS			
LOS [a] C or better	LOS C or better	LOS C or better	None
LOS C or better	LOS D or worse	—	Direct
LOS D	LOS D and adds 2.0 seconds or more of delay	—	Cumulative
LOS D	LOS E or F	—	Direct
LOS E	LOS F	—	Direct
LOS F	LOS F and delay increases by ≥ 10.0 seconds	—	Direct
Any LOS	Project does not degrade LOS and adds 2.0 to 9.9 seconds of delay	LOS E or worse	Cumulative
Any LOS	Project does not degrade LOS and adds < 2.0 seconds of delay	Any LOS	None
SEGMENTS			
LOS C or better	LOS C or better	LOS C or better	None
LOS C or better	LOS C or better and v/c > 0.02	LOS D or worse	Cumulative
LOS C or better	LOS D or worse	—	Direct [b]
LOS D	LOS D and v/c > 0.02	—	Cumulative
LOS D	LOS E or F	—	Direct
LOS E	LOS F	—	Direct
LOS F	LOS F and v/c [c] increases by > 0.09	—	Direct
Any LOS	LOS E or worse and v/c 0.02 to 0.09	LOS E or worse	Cumulative
Any LOS	LOS E or worse and v/c < 0.02	Any LOS	None

Source: Linscott, Law & Greenspan, Engineers

Footnotes:
a. Level of Service
b. Exception: post-project segment operation is LOS D and intersections along segment are LOS D or better results in no significant impact.
c. Volume to Capacity Ratio

6.0 ANALYSIS OF EXISTING CONDITIONS

6.1 Peak Hour Intersection Levels of Service

Table 6-1 summarizes the Existing peak hour intersection operations. As seen in *Table 6-1*, the minor street left-turn movements at all study area unsignalized intersections are calculated to currently operate at LOS B or better.

TABLE 6–1
EXISTING INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Delay [a]	LOS [b]
1. Blair Rd / W. Lindsey Rd	TWSC	AM PM	0.0 0.0	A A
2. Blair Rd / Young Rd	TWSC	AM PM	11.3 10.1	B B
3. Blair Rd / SR 115	TWSC	AM PM	11.4 9.6	B A

Footnotes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. TWSC – Two-Way Stop Controlled intersection. Minor street left turn delay is reported.

SIGNALIZED		UNSIGNALIZED	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

6.2 Daily Street Segment Levels of Service

Table 6-2 summarizes the Existing daily segment operations. As seen in *Table 6-2*, the study area segments are both calculated to currently operate at LOS B or better.

TABLE 6–2
EXISTING STREET SEGMENT OPERATIONS

Street Segment	Classification	Capacity (LOS E) [a]	ADT [b]	LOS [c]	V/C [d]
Blair Road					
Lindsey Rd to SR 115	Local Collector	16,200	2,300	B	0.142
SR 115					
Industrial Rd to Blair Rd	Local Collector	16,200	1,900	A	0.117

Footnotes:

a. Capacities based on Imperial County Roadway Classification Table.

b. Average Daily Traffic Volumes.

c. Level of Service.

d. Volume to Capacity.

7.0 CUMULATIVE PROJECTS

No cumulative projects were identified in the Project vicinity. Therefore, for a conservative analysis, a 10% ambient growth was applied to the Existing peak hour and segment traffic volumes.

8.0 TRIP GENERATION/DISTRIBUTION/ASSIGNMENT

8.1 Trip Generation

Based on the increase in truck and worker activity over the Existing (approved) at the subject site, the Net Project trip generation was developed. The current site activities are over and above the approved CUP. The increase analyzed is that over the approved amounts (not existing), thus providing a conservative analysis.

8.1.1 *Truck Traffic*

Double truck trailers will bring raw product to the Project site and will be stored on the BRS1 and BRS2 stock yards. After processing, the finished product will be transported by *container trucks* to the to the rail spur at the All American Grain (AAG) facility located at 305 Yocum Road, as described in section 2 Project Description. These are heavy trucks and equivalent to more than one passenger vehicle. Thus, the trucks have to be expressed in terms of number of cars (Passenger Car Equivalence).

8.1.2 *Passenger Car Equivalence*

Passenger Car Equivalence (PCE) is defined as the number of passenger cars that are displaced by a single heavy vehicle of a particular type under the prevailing traffic conditions. Heavy vehicles have a greater traffic impact than passenger cars since:

- They are larger than passenger cars, and therefore, occupy more roadway space; and
- Their performance characteristics are generally inferior to passenger cars, leading to the formation of downstream gaps in the traffic stream (especially on upgrades) which cannot always be effectively filled by normal passing maneuvers.

Most of the project-generated traffic consists of heavy vehicles (trucks). The peak hour analysis accounts for trucks in terms of heavy vehicle percentage. The daily traffic generation (ADT) is calculated with the PCE factor. Exhibit 12-25, Passenger Car Equivalents on General Terrain Segments, Highway Capacity Manual (HCM), Version 6.0, summarizes PCE factors for various types of terrain. The type of terrain along the truck route is level. The passenger car equivalent of 3.0 for trucks on a rolling terrain is used in this analysis.

8.1.3 *Worker Traffic*

Workers at the site also generate traffic. These workers will work in shifts at various activities. The trip generation table includes the number of workers.

8.1.4 *Miscellaneous Traffic*

Miscellaneous traffic related to deliveries, etc., are also included in the trip generation table.

Table 8–1 tabulates the total project traffic generation. The project is calculated to generate approximately 342 ADT with 54 AM peak hour trips (42 inbound / 12 outbound trips) and 24 PM peak hour trips (12 inbound / 12 outbound trips).

TABLE 8–1
PROJECT TRIP GENERATION

Construction Phase	# of Vehicles (One-Way)			Inbound + Outbound			Apply PCE (Total ADT)		AM Peak Hour [a]			PM Peak Hour [a]		
	Existing	Future	Increase	Existing	Future	Increase	PCE [b]	With PCE	In	Out	Total	In	Out	Total
Truck Traffic														
Double Truck Trailers	60	100	40	120	200	80	2	160	8	8	16	8	8	16
Container Trucks	50	60	10	100	120	20	2	40	2	2	4	2	2	4
Total Trucks	**110**	**160**	**50**	**220**	**320**	**100**	**2**	**200**	**10**	**10**	**20**	**10**	**10**	**20**
Worker Traffic	49	100	51	98	200	102	1	102	30	0	30	0	0	0
Miscellaneous (Deliveries, Etc.)						20	2	40	2	2	4	2	2	4
Total Traffic								**342**	**42**	**12**	**54**	**12**	**12**	**24**

Footnotes:

a. Peak hour trucks calculated assuming 10-hour work-day.
b. Per Exhibit 12-25 Passenger Car Equivalent (PCE) for General Terrain Segments, Highway Capacity Manual (HCM) Version 6.0, the PCE for trucks is 2.0 for rolling terrain.

General

Table shows increase in trips generated by the *difference* in truck and worker traffic.

8.2 Trip Distribution/Assignment

As shown on *Figure 2-4*, all *Double Truck Trailers* bringing raw product to the site will approach from SR 111 north or SR 111 South and will access the site via Calipatria.

All finished products will be transported to the rail spur at the AAG facility. Thus, all *Container Trucks* transporting finished products from the site will access the rail spur west on SR 115 in Calipatria.

All employee traffic will also be to and from Calipatria since that is the closest population center and other population centers are connected via SR 111 to Calipatria.

8.3 Trip Distribution/Assignment

For a conservative analysis, all *Double Truck Trailers* was assigned to the BRS2 stack yard site at Blair Road / W. Lindsey Road, even though there is some storage at the BRSI site. Since the Press is located at the BRS1 site, all container truck traffic was assigned to the BRS1 site. The worker and Miscellaneous traffic was assigned to the BRSI site.

Figure 8-1 depicts the Project traffic distribution. ***Figure 8-2*** depicts the Project Traffic Assignment. ***Figure 8-3*** depicts the Existing + Project traffic volumes, while ***Figure 8-4*** depicts the Existing + Cumulative Growth + Project traffic volumes.

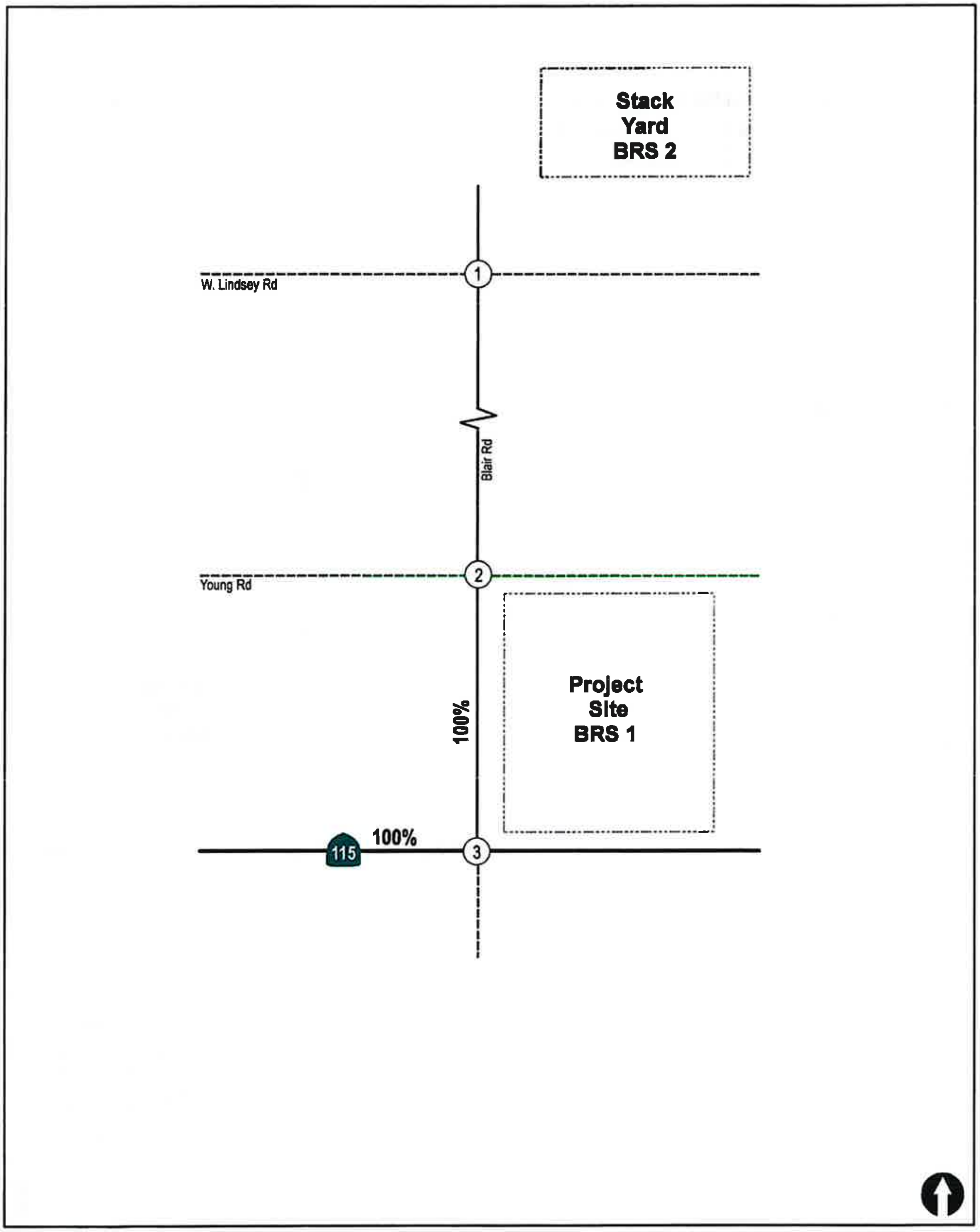

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Figure 8-1

Project Traffic Distribution

BLAIR RANCH

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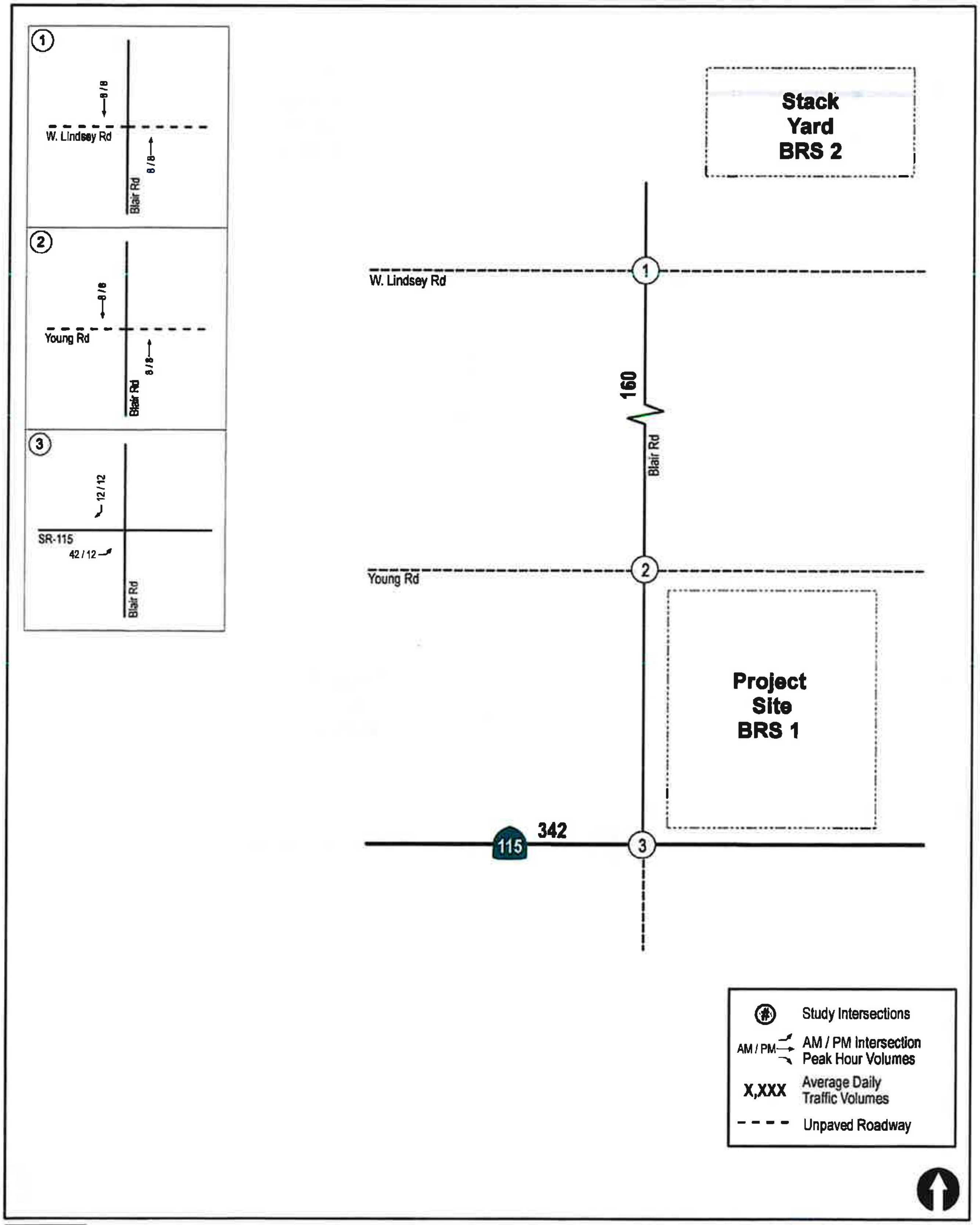

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Figure 8-2

Project Traffic Volumes

BLAIR RANCH

EEC ORIGINAL PKG.

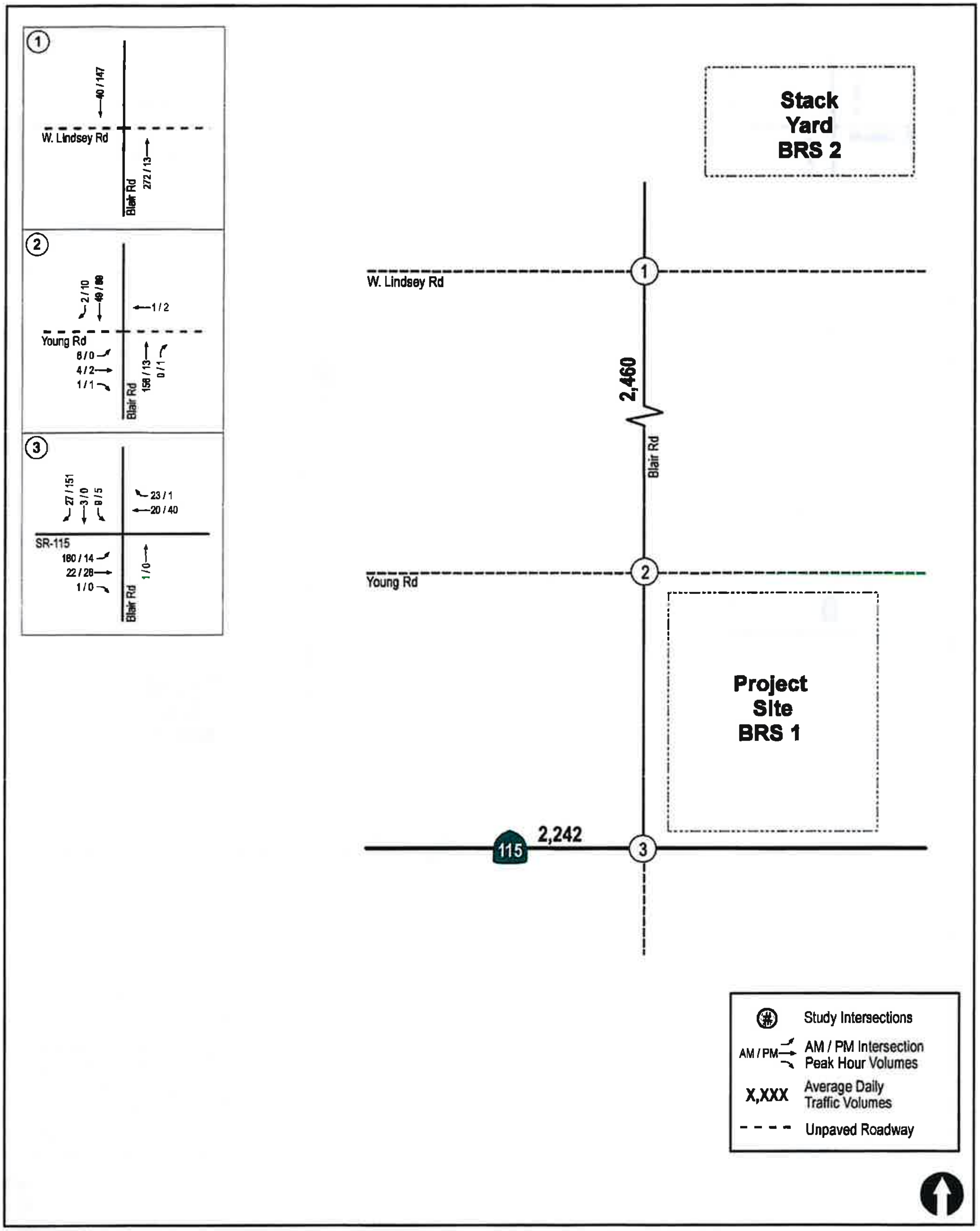

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Figure 8-3

Existing + Project Traffic Volumes

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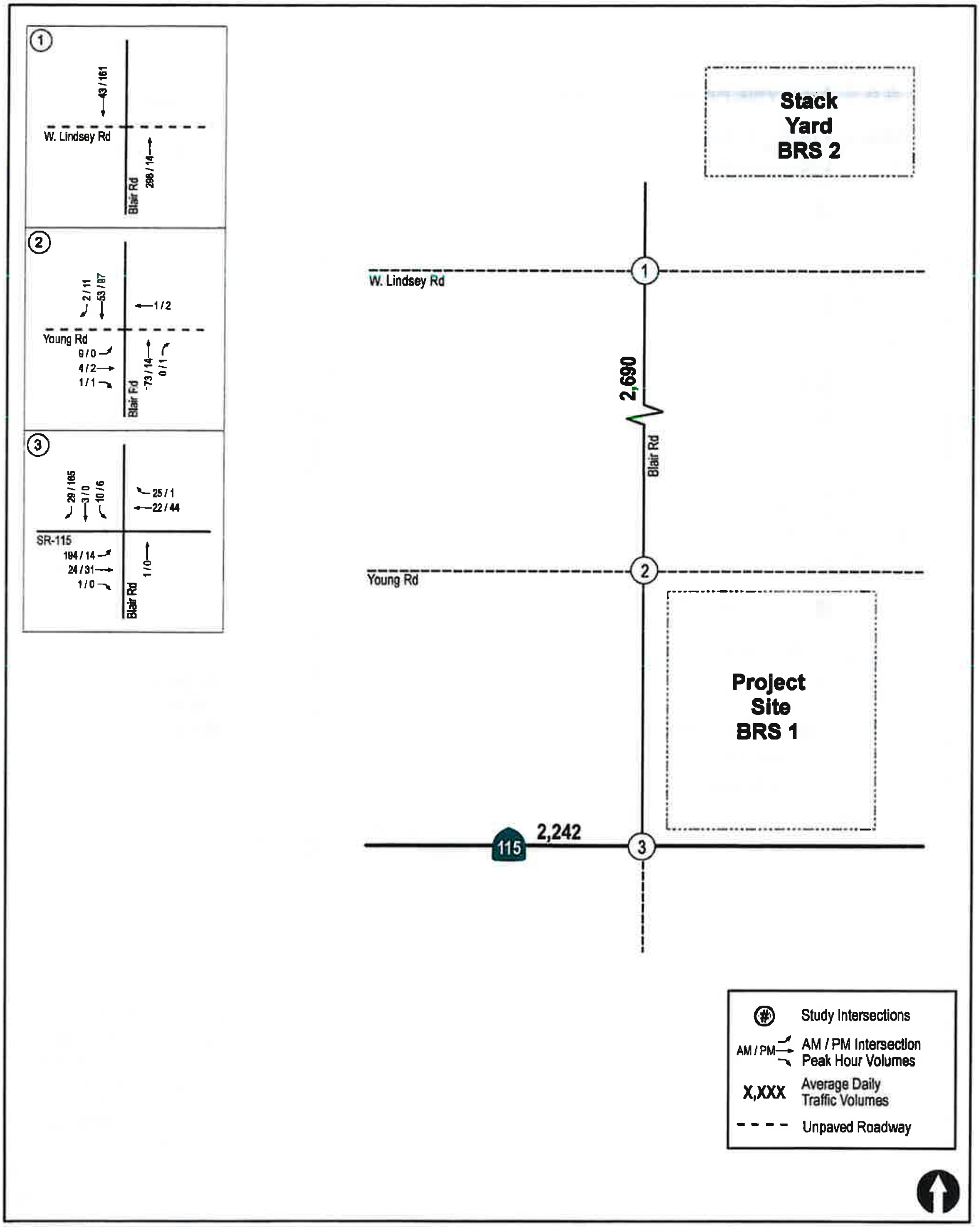

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Figure 8-4

Existing + Cumulative Projects + Project Traffic Volumes

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9.0 ANALYSIS OF NEAR-TERM SCENARIOS

9.1 Existing + Project

9.1.1 *Intersection Analysis*

Table 9-1 summarizes the Existing + Project peak hour intersection operations. As seen in *Table 9-1*, with the addition of Project traffic, the minor street left-turn movements at all study area unsignalized intersections are calculated to continue to operate at LOS B or better.

Appendix C includes the Existing + Project peak hour intersection analysis worksheets.

9.1.2 *Segment Operations*

Table 9-2 summarizes the Existing + Project daily segment operations. As seen in *Table 9-2*, with the addition of Project traffic, the study area segments are both calculated to continue to operate at LOS B or better.

9.2 Existing + Project + Cumulative Growth

9.2.1 *Intersection Analysis*

Table 9-1 summarizes the Existing + Project + Cumulative Growth peak hour intersection operations. As seen in *Table 9-1*, with the addition of Cumulative Growth, the minor street left-turn movements at all study area unsignalized intersections are calculated to continue to operate at LOS B or better.

Appendix D includes the Existing + Cumulative Growth + Project peak hour intersection analysis worksheets.

9.2.2 *Segment Operations*

Table 9-2 summarizes the Existing + Project + Cumulative Growth daily segment operations. As seen in *Table 9-2*, with the addition of Cumulative Growth, the study area segments are both calculated to continue to operate at LOS B or better.

TABLE 9–1
NEAR-TERM INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Δ[c]	Sig?	Existing + Project + Cumulative Growth		Δ[c]	Sig?
			Delay[a]	LOS[b]	Delay	LOS			Delay	LOS		
1. Blair Rd / W. Lindsey Rd	TWSC	AM	0.0	A	0.0	A	0.0	No	0.0	A	0.0	No
		PM	0.0	A	0.0	A	0.0	No	0.0	A	0.0	No
2. Blair Rd / Young Rd	TWSC	AM	11.3	B	11.5	B	0.2	No	11.7	B	0.4	No
		PM	10.1	B	10.3	B	0.2	No	10.4	B	0.3	No
3. Blair Rd / SR 115	TWSC	AM	11.4	B	11.6	B	0.2	No	12.1	B	0.7	No
		PM	9.6	A	9.7	A	0.1	No	9.9	A	0.3	No

Footnotes:

a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Δ denotes an increase in delay due to project.
d. TWSC – Two-Way Stop Controlled intersection. Minor street left turn delay is reported.

SIGNALIZED Delay	SIGNALIZED LOS	UNSIGNALIZED Delay	UNSIGNALIZED LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

Table 9-2
Near-Term Segment Volumes

Segment	Functional Classification [a]	LOS E [b] Capacity	Existing			Existing + Project			Δ V/C [f]	Impact Type	Existing + Cumulative Growth + Project			Δ V/C	Impact Type
			Vol [c]	LOS [d]	V/C [e]	Vol	LOS	V/C			Vol	LOS	V/C		
Blair Road															
Lindsey Rd to Young Rd	Local Collector	16,200	2,300	B	0.142	2,460	B	0.152	0.010	None	2,690	B	0.166	0.010	None
SR 115															
Industrial Rd to Blair Rd	Local Collector	16,200	1,900	A	0.117	2,242	B	0.138	0.021	None	2,242	B	0.138	0.021	None

Footnotes:

a. The Imperial County roadway classification at which the roadway currently functions.
b. The capacity of the roadway at Level of Service E.
c. Existing daily segment volumes from *Table 3-1*.
d. Level of Service.
e. The Volume to Capacity ratio.
f. increase in V/C ratio due to the addition of project traffic.

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10.0 Site Access Discussion

10.1 Site Access Discussion

As described in Section 2, Project Description, two points of ingress/egress are available to access BRS1. The main access located approximately 1,200 feet north of SR 115 is a commercial driveway along Blair Road which extends east into the facility leading to the Guard House. Traffic heading north or south along Blair Road can turn right or left into the facility. A second access off Blair Road is located south of the main access, approximately 450 feet north of SR 115 and provides a right-turn in only into site.

The total peak hour traffic at both driveways combined is less than 8 trucks and hence these driveways are expected to operate adequately.

11.0 CONCLUSIONS

The analysis of all study area intersections and segments under all analysis scenarios results in LOS B or better operations with the addition of Project traffic. Hence the Project does not have any impacts and no mitigation measures are recommended.

End of Report

LINSCOTT
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engineers

TECHNICAL APPENDICES
BLAIR RANCH PROJECT

Calipatria, California
November 8, 2019

LLG Ref. 3-19-3167

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APPENDICES

APPENDIX	
A.	Intersection and Segment Manual Count Sheets
B.	Peak Hour Intersection Analysis Worksheets - Existing
C.	Peak Hour Intersection Analysis Worksheets – Existing + Project
D.	Peak Hour Intersection Analysis Worksheets – Existing + Project + Cumulative Projects

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APPENDIX A

INTERSECTION AND SEGMENT MANUAL COUNT SHEETS

Intersection Turning Movement - Peak Hour Vehicle Count

LINSCOTT LAW & GREENSPAN engineers	Location:	#01	File Name:	ITM-19-119-01
	Intersection:	Blair Road & West Lindsey Road	Project:	LLG Ref. 3-19-3167
	Date of Count:	Thursday, October 10, 2019		Calipatria

AM	Blair Road Southbound			West Lindsey Road Westbound			Blair Road Northbound			West Lindsey Road Eastbound			
	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Total
7:00	0	9	0	0	0	0	0	43	0	0	0	0	52
7:15	0	6	0	0	0	0	0	43	0	0	0	0	49
7:30	0	8	0	0	0	0	0	63	0	0	0	0	71
7:45	0	9	0	0	0	0	0	115	0	0	0	0	124
8:00	0	5	0	0	0	0	0	28	0	0	0	0	33
8:15	0	7	0	0	0	0	0	29	0	0	0	0	36
8:30	0	6	0	0	0	0	0	15	0	0	0	0	21
8:45	0	5	1	0	0	0	0	12	0	0	0	1	19
Total	0	55	1	0	0	0	0	348	0	0	0	1	405
Approach%	-	98.2	1.8	-	-	-	-	100.0	-	-	-	100.0	
Total%	-	13.6	0.2	-	-	-	-	85.9	-	-	-	0.2	

AM Intersection Peak Hour: 07:00 to 08:00

Volume	-	32	-	-	-	-	-	264	-	-	-	-	296
Approach%	-	100.0	-	-	-	-	-	100.0	-	-	-	-	
Total%	-	10.8	-	-	-	-	-	89.2	-	-	-	-	
PHF			0.89			#DIV/0!			0.57			#DIV/0!	0.60

PM	Blair Road Southbound			West Lindsey Road Westbound			Blair Road Northbound			West Lindsey Road Eastbound			
	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Total
16:00	0	53	0	0	0	0	0	3	0	0	0	0	56
16:15	0	27	0	0	0	0	0	0	0	0	0	0	27
16:30	0	44	0	0	0	0	0	1	0	0	0	0	45
16:45	0	15	0	0	0	0	0	1	0	0	0	0	16
17:00	0	12	0	0	0	0	0	0	0	0	0	0	12
17:15	0	6	0	0	0	0	0	0	0	0	0	0	6
17:30	0	3	0	0	0	0	0	1	0	0	0	0	4
17:45	0	4	0	0	0	0	0	0	0	0	0	0	4
Total	0	164	0	0	0	0	0	6	0	0	0	0	170
Approach%	-	100.0	-	-	-	-	-	100.0	-	-	-	-	
Total%	-	96.5	-	-	-	-	-	3.5	-	-	-	-	

PM Intersection Peak Hour: 16:00 to 17:00

Volume	-	139	-	-	-	-	-	5	-	-	-	-	144
Approach%	-	100.0	-	-	-	-	-	100.0	-	-	-	-	
Total%	-	96.5	-	-	-	-	-	3.5	-	-	-	-	
PHF			0.66			#DIV/0!			0.42			#DIV/0!	0.64

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Intersection Turning Movement - Bicycle & Pedestrian Count

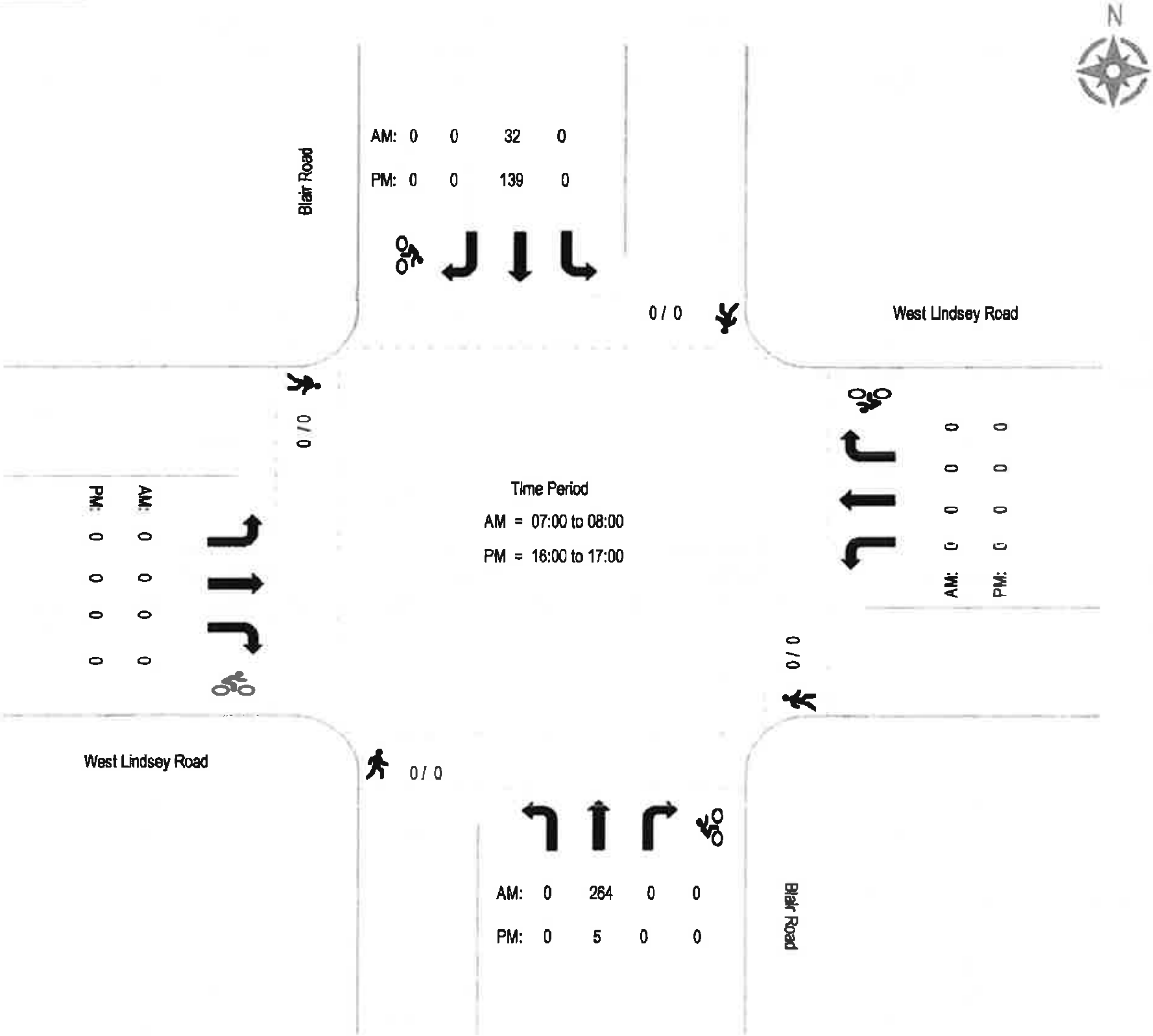
Location:	#01	File Name:	ITM-19-119-01
Intersection:	Blair Road & West Lindsey Road	Project:	LLG Ref. 3-19-3167
Date of Count:	Thursday, October 10, 2019		Calipatria

AM	Blair Road Southbound				West Lindsey Road Westbound				Blair Road Northbound				West Lindsey Road Eastbound				Totals	
	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	Bicycle
7:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ped Total	0				0				0				0				0	
Bike Total		0	0	0		0	0	0		0	0	0		0	0	0		0

PM	Blair Road Southbound				West Lindsey Road Westbound				Blair Road Northbound				West Lindsey Road Eastbound				Totals	
	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	Bicycle
16:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ped Total	0				0				0				0				0	
Bike Total		0	0	0		0	0	0		0	0	0		0	0	0		0

Intersection Turning Movement - Peak Hour Summary

Location:	#01	File Name:	ITM-19-119-01
Intersection:	Blair Road & West Lindsey Road	Project:	LLG Ref. 3-19-3167
Date of Count:	Thursday, October 10, 2019		Calipatria



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Intersection Turning Movement - Peak Hour Vehicle Count

LINSCOTT LAW & GREENSPAN engineers	Location:	#02	File Name:	ITM-19-119-02
	Intersection:	Blair Road & Young Road	Project:	LLG Ref. 3-19-3167
	Date of Count:	Thursday, October 10, 2019		Calipatria

AM	Blair Road Southbound			Young Road Westbound			Blair Road Northbound			Young Road Eastbound			Total
	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Total
7:00	0	10	0	0	0	0	0	20	0	1	2	0	33
7:15	0	8	1	0	0	0	0	21	0	3	0	0	33
7:30	0	10	0	0	1	0	0	41	0	2	2	1	57
7:45	0	13	1	0	0	0	0	68	0	2	0	0	84
8:00	0	8	0	0	0	0	0	18	0	3	0	0	29
8:15	0	4	2	0	0	0	0	18	1	2	0	0	27
8:30	0	7	1	0	2	0	0	15	0	0	0	0	25
8:45	0	7	0	0	1	0	0	11	0	0	0	0	19
Total	0	67	5	0	4	0	0	212	1	13	4	1	307
Approach%	-	93.1	6.9	-	100.0	-	-	99.5	0.5	72.2	22.2	5.6	
Total%	-	21.8	1.6	-	1.3	-	-	69.1	0.3	4.2	1.3	0.3	

AM Intersection Peak Hour: **07:00 to 08:00**

	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Total
Volume	-	41	2	-	1	-	-	150	-	8	4	1	207
Approach%	-	95.3	4.7	-	100.0	-	-	100.0	-	61.5	30.8	7.7	
Total%	-	19.8	1.0	-	0.5	-	-	72.5	-	3.9	1.9	0.5	
PHF			0.77			0.25			0.55			0.65	0.62

PM	Blair Road Southbound			Young Road Westbound			Blair Road Northbound			Young Road Eastbound			Total
	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Total
16:00	0	37	3	0	1	0	0	2	1	0	0	0	44
16:15	0	21	2	0	1	0	0	0	0	0	1	1	26
16:30	0	18	4	0	0	0	0	2	0	0	1	0	25
16:45	0	12	1	0	0	0	0	1	0	0	0	0	14
17:00	0	11	0	0	0	0	0	0	0	0	0	0	11
17:15	0	6	1	0	0	0	0	0	0	0	0	0	7
17:30	0	2	0	0	0	0	0	1	0	0	0	0	3
17:45	0	4	0	0	0	0	0	0	0	0	0	0	4
Total	0	111	11	0	2	0	0	6	1	0	2	1	134
Approach%	-	91.0	9.0	-	100.0	-	-	85.7	14.3	-	66.7	33.3	
Total%	-	82.8	8.2	-	1.5	-	-	4.5	0.7	-	1.5	0.7	

PM Intersection Peak Hour: **16:00 to 17:00**

	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Total
Volume	-	88	10	-	2	-	-	5	1	-	2	1	109
Approach%	-	89.8	10.2	-	100.0	-	-	83.3	16.7	-	66.7	33.3	
Total%	-	80.7	9.2	-	1.8	-	-	4.6	0.9	-	1.8	0.9	
PHF			0.61			0.50			0.50			0.38	0.62

EEC ORIGINAL PKG.

Intersection Turning Movement - Bicycle & Pedestrian Count

LINSCOTT LAW & GREENSPAN engineers

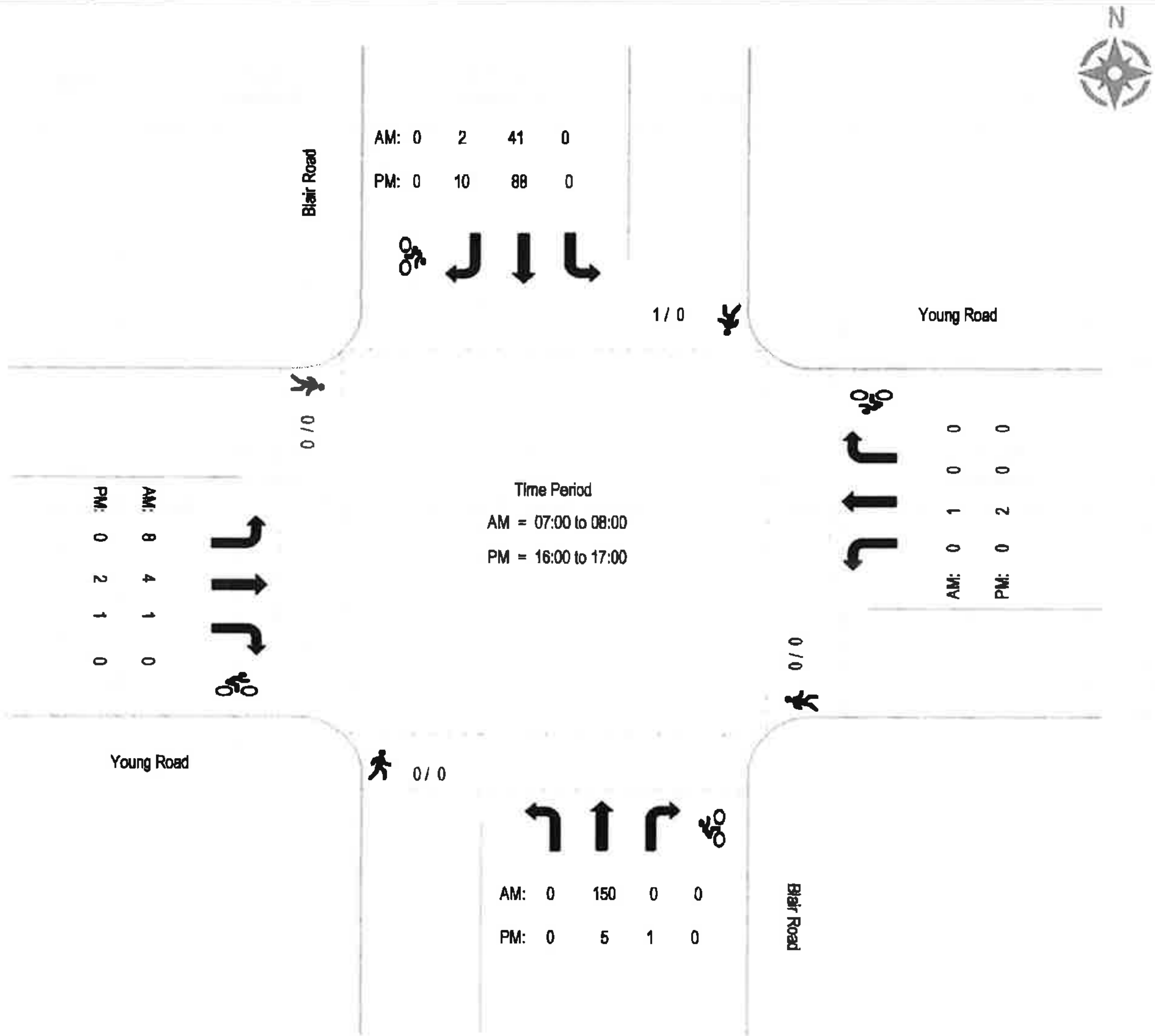
Location:	#02	File Name:	ITM-19-119-02
Intersection:	Blair Road & Young Road	Project:	LLG Ref. 3-19-3167
Date of Count:	Thursday, October 10, 2019		Calipatria

AM	Blair Road Southbound				Young Road Westbound				Blair Road Northbound				Young Road Eastbound				Totals	
	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	Bicycle
7:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:45	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
Ped Total	1				0				0				0				1	
Bike Total		0	0	0		0	0	0		0	0	0		0	0	0		0

PM	Blair Road Southbound				Young Road Westbound				Blair Road Northbound				Young Road Eastbound				Totals	
	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	Bicycle
16:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ped Total	0				0				0				0				0	
Bike Total		0	0	0		0	0	0		0	0	0		0	0	0		0

Intersection Turning Movement - Peak Hour Summary

Location:	#02	File Name:	ITM-19-119-02
Intersection:	Blair Road & Young Road	Project:	LLG Ref. 3-19-3167
Date of Count:	Thursday, October 10, 2019		Calipatria



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EEC ORIGINAL PKG.

Intersection Turning Movement - Peak Hour Vehicle Count

Location:	#03	File Name:	ITM-19-119-03
Intersection:	Blair Road & State Route 115	Project:	LLG Ref. 3-19-3167
Date of Count:	Thursday, October 10, 2019		Calipatria

AM	Blair Road Southbound			State Route 115 Westbound			Blair Road Northbound			State Route 115 Eastbound			Total
	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	
7:00	2	0	1	0	4	7	0	1	0	34	4	1	54
7:15	2	1	3	0	9	3	0	0	0	31	8	0	57
7:30	2	1	5	0	6	7	0	0	0	57	8	0	86
7:45	3	1	6	0	1	6	0	0	0	16	2	0	35
8:00	2	1	2	0	3	5	0	1	0	19	1	0	34
8:15	1	0	3	0	9	2	0	0	0	24	7	0	46
8:30	1	1	4	0	6	3	0	2	0	11	5	0	33
8:45	1	0	1	0	5	2	0	0	0	9	13	0	31
Total	14	5	25	0	43	35	0	4	0	201	48	1	376
Approach%	31.8	11.4	56.8	-	55.1	44.9	-	100.0	-	80.4	19.2	0.4	
Total%	3.7	1.3	6.6	-	11.4	9.3	-	1.1	-	53.5	12.8	0.3	

AM Intersection Peak Hour: **07:00 to 08:00**

Volume	9	3	15	-	20	23	-	1	-	138	22	1	232
Approach%	33.3	11.1	55.6	-	46.5	53.5	-	100.0	-	85.7	13.7	0.6	
Total%	3.9	1.3	6.5	-	8.6	9.9	-	0.4	-	59.5	9.5	0.4	
PHF			0.68			0.83			0.25			0.62	0.67

PM	Blair Road Southbound			State Route 115 Westbound			Blair Road Northbound			State Route 115 Eastbound			Total
	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	
16:00	0	0	52	0	8	1	0	0	0	0	8	0	69
16:15	1	0	30	0	19	0	0	0	0	0	4	0	54
16:30	3	0	41	0	8	0	0	0	0	1	4	0	57
16:45	1	0	16	0	5	0	0	0	0	1	12	0	35
17:00	1	0	10	0	4	0	0	0	0	0	5	0	20
17:15	3	0	6	0	1	0	0	0	0	0	1	0	11
17:30	0	0	3	0	2	0	0	0	0	0	1	0	6
17:45	0	0	5	0	2	0	0	0	0	0	3	0	10
Total	9	0	163	0	49	1	0	0	0	2	38	0	262
Approach%	5.2	-	94.8	-	98.0	2.0	-	-	-	5.0	95.0	-	
Total%	3.4	-	62.2	-	18.7	0.4	-	-	-	0.8	14.5	-	

PM Intersection Peak Hour: **16:00 to 17:00**

Volume	5	-	139	-	40	1	-	-	-	2	28	-	215
Approach%	3.5	-	96.5	-	97.6	2.4	-	-	-	6.7	93.3	-	
Total%	2.3	-	64.7	-	18.6	0.5	-	-	-	0.9	13.0	-	
PHF			0.69			0.54			#DIV/0!			0.58	0.78

EEC ORIGINAL PKG.

Intersection Turning Movement - Bicycle & Pedestrian Count

Location:	#03	File Name:	ITM-19-119-03
Intersection:	Blair Road & State Route 115	Project:	LLG Ref. 3-19-3167
Date of Count:	Thursday, October 10, 2019		Calipatria

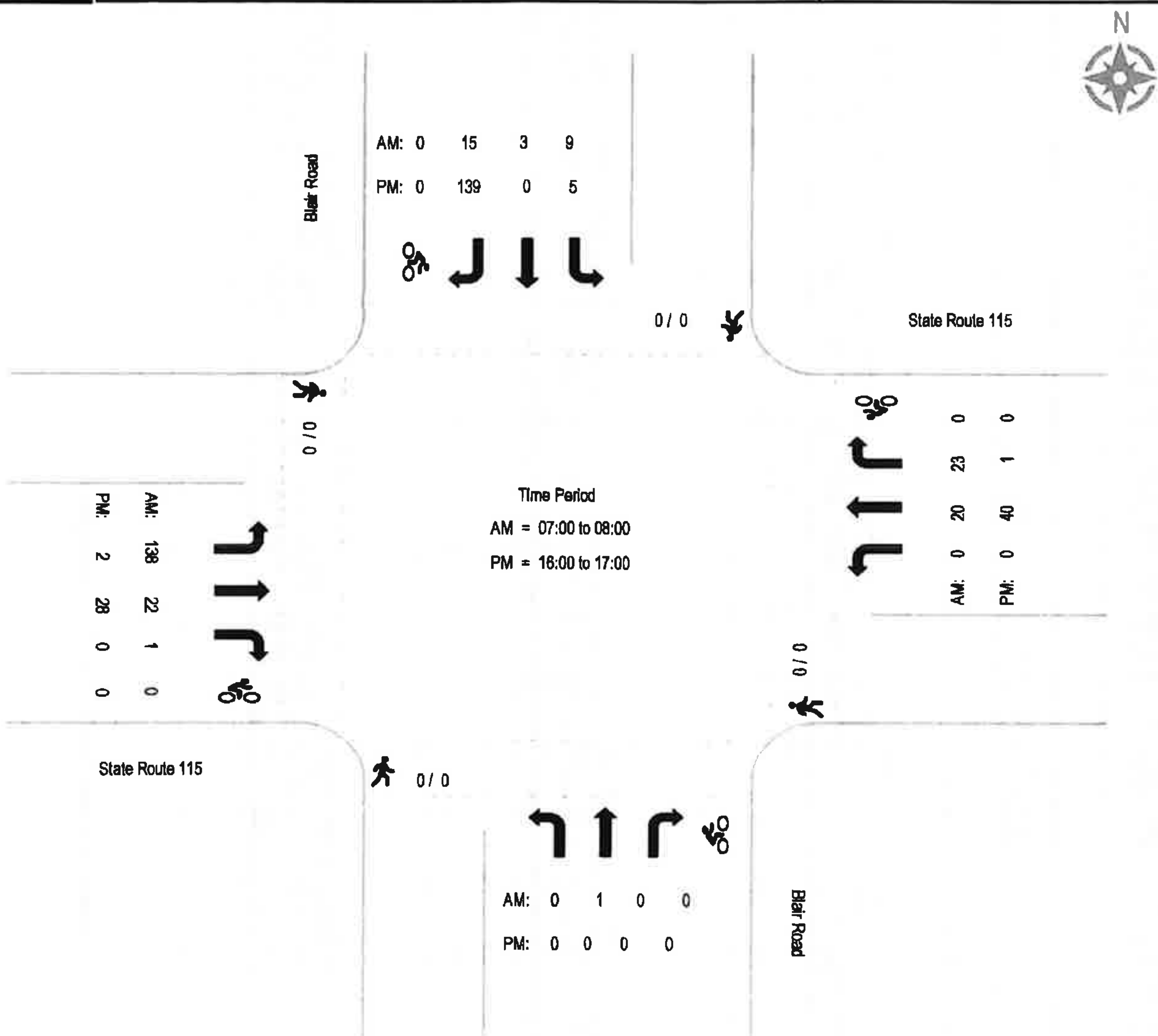
AM	Blair Road Southbound				State Route 115 Westbound				Blair Road Northbound				State Route 115 Eastbound				Totals	
	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	Bicycle
7:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ped Total	0				0				0				0				0	
Bike Total		0	0	0		0	0	0		0	0	0		0	0	0		0

PM	Blair Road Southbound				State Route 115 Westbound				Blair Road Northbound				State Route 115 Eastbound				Totals	
	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	B-Left	B-Thru	B-Right	Ped	Bicycle
16:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ped Total	0				0				0				0				0	
Bike Total		0	0	0		0	0	0		0	0	0		0	0	0		0

EEC ORIGINAL PKG.

Intersection Turning Movement - Peak Hour Summary

Location:	#03	File Name:	ITM-19-119-03
Intersection:	Blair Road & State Route 115	Project:	LLG Ref. 3-19-3167
Date of Count:	Thursday, October 10, 2019		Calipatria



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EEC ORIGINAL PKG.

Linscott, Law & Greenspan, Engineers

4542 Ruffner Street, Suite 100, San Diego, CA 92111

Average Daily Traffic

Location: **Blair Road, between W. Lindsey Road and State Route 115**

Date: **Thursday, October 10, 2019** Total Daily Volume: **2297** Description: **Total Volume**

0:00	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00
6	1	9	19	16	198	224	298	114	64	55	106	101	219	194	263	144	25	12	21	21	137	47	3
0	1	0	0	1	5	49	48	39	13	16	26	30	32	63	83	56	12	2	5	5	5	41	2
0	0	0	3	1	30	31	49	35	16	11	29	17	56	29	21	27	5	7	0	2	19	6	1
3	0	5	7	4	80	48	76	21	20	13	27	29	62	27	66	45	4	2	5	2	34	0	0
3	0	4	9	10	83	96	125	19	15	15	24	25	69	75	93	16	4	1	11	12	79	0	0

Date: **Thursday, October 10, 2019** Total Daily Volume: **1174** Description: **Northbound Volume**

0:00	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00
5	1	6	18	15	185	183	270	89	38	32	53	41	126	20	23	4	1	1	1	5	53	1	3
0	1	0	0	1	4	27	41	33	7	10	15	9	25	5	3	2	0	1	1	0	2	0	2
0	0	0	2	1	29	22	43	29	10	7	8	8	40	4	2	0	0	0	0	0	17	1	1
2	0	2	7	3	80	44	68	15	12	3	18	11	46	4	12	1	1	0	0	2	25	0	0
3	0	4	9	10	72	90	118	12	9	12	12	13	15	7	6	1	0	0	0	3	9	0	0

Date: **Thursday, October 10, 2019** Total Daily Volume: **1123** Description: **Southbound Volume**

0:00	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00	19:00	20:00	21:00	22:00	23:00
1	0	3	1	1	13	41	28	25	26	23	53	60	93	174	240	140	24	11	20	16	84	46	0
0	0	0	0	0	1	22	7	6	6	6	11	21	7	58	80	54	12	1	4	5	3	41	0
0	0	0	1	0	1	9	6	6	6	4	21	9	16	25	19	27	5	7	0	2	2	5	0
1	0	3	0	1	0	4	8	6	8	10	9	18	16	23	54	44	3	2	5	0	9	0	0
0	0	0	0	0	11	6	7	7	6	3	12	12	54	68	87	15	4	1	11	9	70	0	0

EEC ORIGINAL PKG.

APPENDIX B

PEAK HOUR INTERSECTION ANALYSIS WORKSHEETS – EXISTING

Intersection	
Int Delay, s/veh	0

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	0	0	0	0	264	0	0	32	0
Future Vol, veh/h	0	0	0	0	0	0	0	264	0	0	32	0
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	60	60	60	60	60	60	60	60	60	60	60	60
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	0	0	0	0	0	0	440	0	0	53	0

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	513	513	73	513	513	460	63	0	0	450	0	0
Stage 1	63	63	-	450	450	-	-	-	-	-	-	-
Stage 2	450	450	-	63	63	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	472	465	989	472	465	601	1540	-	-	1110	-	-
Stage 1	948	842	-	589	572	-	-	-	-	-	-	-
Stage 2	589	572	-	948	842	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	463	456	970	463	456	590	1525	-	-	1099	-	-
Mov Cap-2 Maneuver	463	456	-	463	456	-	-	-	-	-	-	-
Stage 1	939	834	-	583	566	-	-	-	-	-	-	-
Stage 2	583	566	-	939	834	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0	0	0
HCM LOS	A	A		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1525	-	-	-	-	1099	-	-
HCM Lane V/C Ratio	-	-	-	-	-	-	-	-
HCM Control Delay (s)	0	-	-	0	0	0	-	-
HCM Lane LOS	A	-	-	A	A	A	-	-
HCM 95th %tile Q(veh)	0	-	-	-	-	0	-	-

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0.8

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	8	4	1	0	1	0	0	150	0	0	41	2
Future Vol, veh/h	8	4	1	0	1	0	0	150	0	0	41	2
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	62	62	62	62	62	62	62	62	62	62	62	62
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	13	6	2	0	2	0	0	242	0	0	66	3

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	331	330	88	334	331	262	79	0	0	252	0	0
Stage 1	78	78	-	252	252	-	-	-	-	-	-	-
Stage 2	253	252	-	82	79	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	622	589	970	620	588	777	1519	-	-	1313	-	-
Stage 1	931	830	-	752	698	-	-	-	-	-	-	-
Stage 2	751	698	-	926	829	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	609	577	952	602	576	762	1505	-	-	1300	-	-
Mov Cap-2 Maneuver	609	577	-	602	576	-	-	-	-	-	-	-
Stage 1	922	822	-	744	691	-	-	-	-	-	-	-
Stage 2	742	691	-	908	821	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	11.1	11.3	0	0
HCM LOS	B	B		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1505	-	-	616	576	1300	-	-
HCM Lane V/C Ratio	-	-	-	0.034	0.003	-	-	-
HCM Control Delay (s)	0	-	-	11.1	11.3	0	-	-
HCM Lane LOS	A	-	-	B	B	A	-	-
HCM 95th %tile Q(veh)	0	-	-	0.1	0	0	-	-

EEC ORIGINAL PKG.

Intersection												
Int Delay, s/veh	6											

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	138	22	1	0	20	23	0	1	0	9	3	15
Future Vol, veh/h	138	22	1	0	20	23	0	1	0	9	3	15
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	500	-	-	380	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	67	67	67	67	67	67	67	67	67	67	67	67
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	206	33	1	0	30	34	0	1	0	13	4	22

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	74	0	0	44	0	0	526	530	54	513	513	67
Stage 1	-	-	-	-	-	-	456	456	-	57	57	-
Stage 2	-	-	-	-	-	-	70	74	-	456	456	-
Critical Hdwy	4.12	-	-	4.12	-	-	7.12	6.52	6.22	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Follow-up Hdwy	2.218	-	-	2.218	-	-	3.518	4.018	3.318	3.518	4.018	3.318
Pot Cap-1 Maneuver	1526	-	-	1564	-	-	462	455	1013	472	465	997
Stage 1	-	-	-	-	-	-	584	568	-	955	847	-
Stage 2	-	-	-	-	-	-	940	833	-	584	568	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1511	-	-	1549	-	-	393	385	994	413	394	978
Mov Cap-2 Maneuver	-	-	-	-	-	-	393	385	-	413	394	-
Stage 1	-	-	-	-	-	-	499	486	-	817	839	-
Stage 2	-	-	-	-	-	-	905	825	-	498	486	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	6.6	0	14.4	11.4
HCM LOS			B	B

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	385	1511	-	-	1549	-	-	603
HCM Lane V/C Ratio	0.004	0.136	-	-	-	-	-	0.067
HCM Control Delay (s)	14.4	7.8	-	-	0	-	-	11.4
HCM Lane LOS	B	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0	0.5	-	-	0	-	-	0.2

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	0	0	0	0	5	0	0	139	0
Future Vol, veh/h	0	0	0	0	0	0	0	5	0	0	139	0
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	64	64	64	64	64	64	64	64	64	64	64	64
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	0	0	0	0	0	0	8	0	0	217	0

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	245	245	237	245	245	28	227	0	0	18	0	0
Stage 1	227	227	-	18	18	-	-	-	-	-	-	-
Stage 2	18	18	-	227	227	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	709	657	802	709	657	1047	1341	-	-	1599	-	-
Stage 1	776	716	-	1001	880	-	-	-	-	-	-	-
Stage 2	1001	880	-	776	716	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	696	644	787	696	644	1027	1328	-	-	1584	-	-
Mov Cap-2 Maneuver	696	644	-	696	644	-	-	-	-	-	-	-
Stage 1	768	709	-	991	871	-	-	-	-	-	-	-
Stage 2	991	871	-	769	709	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0	0	0
HCM LOS	A	A		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1328	-	-	-	-	1584	-	-
HCM Lane V/C Ratio	-	-	-	-	-	-	-	-
HCM Control Delay (s)	0	-	-	0	0	0	-	-
HCM Lane LOS	A	-	-	A	A	A	-	-
HCM 95th %tile Q(veh)	0	-	-	-	-	0	-	-

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0.5

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	2	1	0	2	0	0	5	1	0	81	10
Future Vol, veh/h	0	2	1	0	2	0	0	5	1	0	81	10
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	62	62	62	62	62	62	62	62	62	62	62	62
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	3	2	0	3	0	0	8	2	0	131	16

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	170	169	159	171	176	29	157	0	0	20	0	0
Stage 1	149	149	-	19	19	-	-	-	-	-	-	-
Stage 2	21	20	-	152	157	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	794	724	886	792	717	1046	1423	-	-	1596	-	-
Stage 1	854	774	-	1000	880	-	-	-	-	-	-	-
Stage 2	998	879	-	850	768	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	777	710	869	773	703	1026	1409	-	-	1581	-	-
Mov Cap-2 Maneuver	777	710	-	773	703	-	-	-	-	-	-	-
Stage 1	845	766	-	990	871	-	-	-	-	-	-	-
Stage 2	985	870	-	837	760	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	9.8	10.1	0	0
HCM LOS	A	B		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1409	-	-	756	703	1581	-	-
HCM Lane V/C Ratio	-	-	-	0.006	0.005	-	-	-
HCM Control Delay (s)	0	-	-	9.8	10.1	0	-	-
HCM Lane LOS	A	-	-	A	B	A	-	-
HCM 95th %tile Q(veh)	0	-	-	0	0	0	-	-

EEC ORIGINAL PKG.

Intersection												
Int Delay, s/veh	6.5											

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↰	↱		↰	↱			✣			✣	
Traffic Vol, veh/h	2	28	0	0	40	1	0	0	0	5	0	139
Future Vol, veh/h	2	28	0	0	40	1	0	0	0	5	0	139
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	500	-	-	380	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	78	78	78	78	78	78	78	78	78	78	78	78
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	3	36	0	0	51	1	0	0	0	6	0	178

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	62	0	0	46	0	0	203	114	56	114	114	72
Stage 1	-	-	-	-	-	-	52	52	-	62	62	-
Stage 2	-	-	-	-	-	-	151	62	-	52	52	-
Critical Hdwy	4.12	-	-	4.12	-	-	7.12	6.52	6.22	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Follow-up Hdwy	2.218	-	-	2.218	-	-	3.518	4.018	3.318	3.518	4.018	3.318
Pot Cap-1 Maneuver	1541	-	-	1562	-	-	755	776	1011	863	776	990
Stage 1	-	-	-	-	-	-	961	852	-	949	843	-
Stage 2	-	-	-	-	-	-	851	843	-	961	852	-
Platoon blocked, %		-			-	-						
Mov Cap-1 Maneuver	1526	-	-	1547	-	-	604	759	992	846	759	971
Mov Cap-2 Maneuver	-	-	-	-	-	-	604	759	-	846	759	-
Stage 1	-	-	-	-	-	-	950	842	-	939	835	-
Stage 2	-	-	-	-	-	-	688	835	-	950	842	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0.5	0	0	9.6
HCM LOS			A	A

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	-	1526	-	-	1547	-	-	966
HCM Lane V/C Ratio	-	0.002	-	-	-	-	-	0.191
HCM Control Delay (s)	0	7.4	-	-	0	-	-	9.6
HCM Lane LOS	A	A	-	-	A	-	-	A
HCM 95th %tile Q(veh)	-	0	-	-	0	-	-	0.7

EEC ORIGINAL PKG.

APPENDIX C

PEAK HOUR INTERSECTION ANALYSIS WORKSHEETS – EXISTING + PROJECT

Intersection	
Int Delay, s/veh	0

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	0	0	0	0	272	0	0	40	0
Future Vol, veh/h	0	0	0	0	0	0	0	272	0	0	40	0
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	60	60	60	60	60	60	60	60	60	60	60	60
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	0	0	0	0	0	0	453	0	0	67	0

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	540	540	87	540	540	473	77	0	0	463	0	0
Stage 1	77	77	-	463	463	-	-	-	-	-	-	-
Stage 2	463	463	-	77	77	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	453	449	971	453	449	591	1522	-	-	1098	-	-
Stage 1	932	831	-	579	564	-	-	-	-	-	-	-
Stage 2	579	564	-	932	831	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	444	440	953	444	440	580	1508	-	-	1088	-	-
Mov Cap-2 Maneuver	444	440	-	444	440	-	-	-	-	-	-	-
Stage 1	923	823	-	573	558	-	-	-	-	-	-	-
Stage 2	573	558	-	923	823	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0	0	0
HCM LOS	A	A		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1508	-	-	-	-	1088	-	-
HCM Lane V/C Ratio	-	-	-	-	-	-	-	-
HCM Control Delay (s)	0	-	-	0	0	0	-	-
HCM Lane LOS	A	-	-	A	A	A	-	-
HCM 95th %tile Q(veh)	0	-	-	-	-	0	-	-

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0.7

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	8	4	1	0	1	0	0	158	0	0	49	2
Future Vol, veh/h	8	4	1	0	1	0	0	158	0	0	49	2
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	62	62	62	62	62	62	62	62	62	62	62	62
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	13	6	2	0	2	0	0	255	0	0	79	3

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	357	356	101	360	357	275	92	0	0	265	0	0
Stage 1	91	91	-	265	265	-	-	-	-	-	-	-
Stage 2	266	265	-	95	92	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	598	570	954	596	569	764	1503	-	-	1299	-	-
Stage 1	916	820	-	740	689	-	-	-	-	-	-	-
Stage 2	739	689	-	912	819	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	585	559	936	579	558	750	1489	-	-	1287	-	-
Mov Cap-2 Maneuver	585	559	-	579	558	-	-	-	-	-	-	-
Stage 1	907	812	-	733	682	-	-	-	-	-	-	-
Stage 2	730	682	-	895	811	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	11.3	11.5	0	0
HCM LOS	B	B		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1489	-	-	594	558	1287	-	-
HCM Lane V/C Ratio	-	-	-	0.035	0.003	-	-	-
HCM Control Delay (s)	0	-	-	11.3	11.5	0	-	-
HCM Lane LOS	A	-	-	B	B	A	-	-
HCM 95th %tile Q(veh)	0	-	-	0.1	0	0	-	-

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	6.6

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	180	22	1	0	20	23	0	1	0	9	3	27
Future Vol, veh/h	180	22	1	0	20	23	0	1	0	9	3	27
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	500	-	-	380	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	67	67	67	67	67	67	67	67	67	67	67	67
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	269	33	1	0	30	34	0	1	0	13	4	40

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	74	0	0	44	0	0	661	656	54	639	639	67
Stage 1	-	-	-	-	-	-	582	582	-	57	57	-
Stage 2	-	-	-	-	-	-	79	74	-	582	582	-
Critical Hdwy	4.12	-	-	4.12	-	-	7.12	6.52	6.22	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Follow-up Hdwy	2.218	-	-	2.218	-	-	3.518	4.018	3.318	3.518	4.018	3.318
Pot Cap-1 Maneuver	1526	-	-	1564	-	-	376	385	1013	389	394	997
Stage 1	-	-	-	-	-	-	499	499	-	955	847	-
Stage 2	-	-	-	-	-	-	930	833	-	499	499	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1511	-	-	1549	-	-	302	310	994	328	318	978
Mov Cap-2 Maneuver	-	-	-	-	-	-	302	310	-	328	318	-
Stage 1	-	-	-	-	-	-	406	406	-	777	839	-
Stage 2	-	-	-	-	-	-	878	825	-	405	406	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	7	0	16.7	11.6
HCM LOS			C	B

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	310	1511	-	-	1549	-	-	605
HCM Lane V/C Ratio	0.005	0.178	-	-	-	-	-	0.096
HCM Control Delay (s)	16.7	7.9	-	-	0	-	-	11.6
HCM Lane LOS	C	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0	0.6	-	-	0	-	-	0.3

EEC ORIGINAL PKG.

Intersection												
Int Delay, s/veh	0											

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	0	0	0	0	13	0	0	147	0
Future Vol, veh/h	0	0	0	0	0	0	0	13	0	0	147	0
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	64	64	64	64	64	64	64	64	64	64	64	64
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	0	0	0	0	0	0	20	0	0	230	0

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	270	270	250	270	270	40	240	0	0	30	0	0
Stage 1	240	240	-	30	30	-	-	-	-	-	-	-
Stage 2	30	30	-	240	240	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	683	636	789	683	636	1031	1327	-	-	1583	-	-
Stage 1	763	707	-	987	870	-	-	-	-	-	-	-
Stage 2	987	870	-	763	707	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	670	623	774	670	623	1011	1314	-	-	1568	-	-
Mov Cap-2 Maneuver	670	623	-	670	623	-	-	-	-	-	-	-
Stage 1	755	700	-	977	861	-	-	-	-	-	-	-
Stage 2	978	861	-	756	700	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0	0	0
HCM LOS	A	A		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1314	-	-	-	-	1568	-	-
HCM Lane V/C Ratio	-	-	-	-	-	-	-	-
HCM Control Delay (s)	0	-	-	0	0	0	-	-
HCM Lane LOS	A	-	-	A	A	A	-	-
HCM 95th %tile Q(veh)	0	-	-	-	-	0	-	-

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0.4

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	2	1	0	2	0	0	13	1	0	89	10
Future Vol, veh/h	0	2	1	0	2	0	0	13	1	0	89	10
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	62	62	62	62	62	62	62	62	62	62	62	62
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	3	2	0	3	0	0	21	2	0	144	16

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	196	195	172	197	202	42	170	0	0	33	0	0
Stage 1	162	162	-	32	32	-	-	-	-	-	-	-
Stage 2	34	33	-	165	170	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	763	700	872	762	694	1029	1407	-	-	1579	-	-
Stage 1	840	764	-	984	868	-	-	-	-	-	-	-
Stage 2	982	868	-	837	758	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	745	686	855	744	680	1009	1394	-	-	1564	-	-
Mov Cap-2 Maneuver	745	686	-	744	680	-	-	-	-	-	-	-
Stage 1	832	756	-	974	859	-	-	-	-	-	-	-
Stage 2	969	859	-	824	750	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	9.9	10.3	0	0
HCM LOS	A	B		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1394	-	-	734	680	1564	-	-
HCM Lane V/C Ratio	-	-	-	0.007	0.005	-	-	-
HCM Control Delay (s)	0	-	-	9.9	10.3	0	-	-
HCM Lane LOS	A	-	-	A	B	A	-	-
HCM 95th %tile Q(veh)	0	-	-	0	0	0	-	-

Intersection	
Int Delay, s/veh	6.8

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	14	28	0	0	40	1	0	0	0	5	0	151
Future Vol, veh/h	14	28	0	0	40	1	0	0	0	5	0	151
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	500	-	-	380	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	78	78	78	78	78	78	78	78	78	78	78	78
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	18	36	0	0	51	1	0	0	0	6	0	194

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	62	0	0	46	0	0	241	144	56	144	144	72
Stage 1	-	-	-	-	-	-	82	82	-	62	62	-
Stage 2	-	-	-	-	-	-	159	62	-	82	82	-
Critical Hdwy	4.12	-	-	4.12	-	-	7.12	6.52	6.22	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Follow-up Hdwy	2.218	-	-	2.218	-	-	3.518	4.018	3.318	3.518	4.018	3.318
Pot Cap-1 Maneuver	1541	-	-	1562	-	-	713	747	1011	825	747	990
Stage 1	-	-	-	-	-	-	926	827	-	949	843	-
Stage 2	-	-	-	-	-	-	843	843	-	926	827	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1526	-	-	1547	-	-	555	723	992	802	723	971
Mov Cap-2 Maneuver	-	-	-	-	-	-	555	723	-	802	723	-
Stage 1	-	-	-	-	-	-	907	809	-	929	835	-
Stage 2	-	-	-	-	-	-	669	835	-	906	809	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	2.5	0	0	9.7
HCM LOS			A	A

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	-	1526	-	-	1547	-	-	964
HCM Lane V/C Ratio	-	0.012	-	-	-	-	-	0.207
HCM Control Delay (s)	0	7.4	-	-	0	-	-	9.7
HCM Lane LOS	A	A	-	-	A	-	-	A
HCM 95th %tile Q(veh)	-	0	-	-	0	-	-	0.8

EEC ORIGINAL PKG.

APPENDIX D

PEAK HOUR INTERSECTION ANALYSIS WORKSHEETS – EXISTING + PROJECT + CUMULATIVE PROJECTS

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	0	0	0	0	298	0	0	43	0
Future Vol, veh/h	0	0	0	0	0	0	0	298	0	0	43	0
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	60	60	60	60	60	60	60	60	60	60	60	60
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	0	0	0	0	0	0	497	0	0	72	0

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	589	589	92	589	589	517	82	0	0	507	0	0
Stage 1	82	82	-	507	507	-	-	-	-	-	-	-
Stage 2	507	507	-	82	82	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	420	421	965	420	421	558	1515	-	-	1058	-	-
Stage 1	926	827	-	548	539	-	-	-	-	-	-	-
Stage 2	548	539	-	926	827	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	412	413	947	412	413	547	1501	-	-	1048	-	-
Mov Cap-2 Maneuver	412	413	-	412	413	-	-	-	-	-	-	-
Stage 1	917	819	-	543	534	-	-	-	-	-	-	-
Stage 2	543	534	-	917	819	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0	0	0
HCM LOS	A	A		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1501	-	-	-	-	1048	-	-
HCM Lane V/C Ratio	-	-	-	-	-	-	-	-
HCM Control Delay (s)	0	-	-	0	0	0	-	-
HCM Lane LOS	A	-	-	A	A	A	-	-
HCM 95th %tile Q(veh)	0	-	-	-	-	0	-	-

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0.7

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	9	4	1	0	1	0	0	173	0	0	53	2
Future Vol, veh/h	9	4	1	0	1	0	0	173	0	0	53	2
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	62	62	62	62	62	62	62	62	62	62	62	62
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	15	6	2	0	2	0	0	279	0	0	85	3

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	387	386	107	390	387	299	98	0	0	289	0	0
Stage 1	97	97	-	289	289	-	-	-	-	-	-	-
Stage 2	290	209	-	101	98	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	572	548	947	569	547	741	1495	-	-	1273	-	-
Stage 1	910	815	-	719	673	-	-	-	-	-	-	-
Stage 2	718	673	-	905	814	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	560	537	929	552	536	727	1481	-	-	1261	-	-
Mov Cap-2 Maneuver	560	537	-	552	536	-	-	-	-	-	-	-
Stage 1	901	807	-	712	666	-	-	-	-	-	-	-
Stage 2	709	666	-	888	806	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	11.6	11.7	0	0
HCM LOS	B	B		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1481	-	-	569	536	1261	-	-
HCM Lane V/C Ratio	-	-	-	0.04	0.003	-	-	-
HCM Control Delay (s)	0	-	-	11.6	11.7	0	-	-
HCM Lane LOS	A	-	-	B	B	A	-	-
HCM 95th %tile Q(veh)	0	-	-	0.1	0	0	-	-

Intersection												
Int Delay, s/veh	6.7											
Movement	**EBL**	**EBT**	**EBR**	**WBL**	**WBT**	**WBR**	**NBL**	**NBT**	**NBR**	**SBL**	**SBT**	**SBR**
Lane Configurations												
Traffic Vol, veh/h	194	24	1	0	22	25	0	1	0	10	3	29
Future Vol, veh/h	194	24	1	0	22	25	0	1	0	10	3	29
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	500	-	-	380	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	67	67	67	67	67	67	67	67	67	67	67	67
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	290	36	1	0	33	37	0	1	0	15	4	43

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	80	0	0	47	0	0	712	707	57	689	689	72
Stage 1	-	-	-	-	-	-	627	627	-	62	62	-
Stage 2	-	-	-	-	-	-	85	80	-	627	627	-
Critical Hdwy	4.12	-	-	4.12	-	-	7.12	6.52	6.22	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Follow-up Hdwy	2.218	-	-	2.218	-	-	3.518	4.018	3.318	3.518	4.018	3.318
Pot Cap-1 Maneuver	1518	-	-	1560	-	-	347	360	1009	360	369	990
Stage 1	-	-	-	-	-	-	471	476	-	949	843	-
Stage 2	-	-	-	-	-	-	923	828	-	471	476	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1504	-	-	1545	-	-	274	285	990	300	292	971
Mov Cap-2 Maneuver	-	-	-	-	-	-	274	285	-	300	292	-
Stage 1	-	-	-	-	-	-	376	380	-	758	835	-
Stage 2	-	-	-	-	-	-	869	820	-	375	380	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	7.1	0	17.7	12.1
HCM LOS			C	B

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	285	1504	-	-	1545	-	-	572
HCM Lane V/C Ratio	0.005	0.193	-	-	-	-	-	0.11
HCM Control Delay (s)	17.7	8	-	-	0	-	-	12.1
HCM Lane LOS	C	A	-	-	A	-	-	B
HCM 95th %tile Q(veh)	0	0.7	-	-	0	-	-	0.4

EEC ORIGINAL PKG.

Intersection	
Int Delay, s/veh	0

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	0	0	0	0	0	14	0	0	161	0
Future Vol, veh/h	0	0	0	0	0	0	0	14	0	0	161	0
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	64	64	64	64	64	64	64	64	64	64	64	64
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	0	0	0	0	0	0	22	0	0	252	0

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	294	294	272	294	294	42	262	0	0	32	0	0
Stage 1	262	262	-	32	32	-	-	-	-	-	-	-
Stage 2	32	32	-	262	262	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	658	617	767	658	617	1029	1302	-	-	1580	-	-
Stage 1	743	691	-	984	868	-	-	-	-	-	-	-
Stage 2	984	868	-	743	691	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	645	605	752	645	605	1009	1290	-	-	1565	-	-
Mov Cap-2 Maneuver	645	605	-	645	605	-	-	-	-	-	-	-
Stage 1	736	684	-	974	859	-	-	-	-	-	-	-
Stage 2	975	859	-	736	684	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0	0	0	0
HCM LOS	A	A		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1290	-	-	-	-	1565	-	-
HCM Lane V/C Ratio	-	-	-	-	-	-	-	-
HCM Control Delay (s)	0	-	-	0	0	0	-	-
HCM Lane LOS	A	-	-	A	A	A	-	-
HCM 95th %tile Q(veh)	0	-	-	-	-	0	-	-

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Intersection	
Int Delay, s/veh	0.4

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	2	1	0	2	0	0	14	1	0	97	11
Future Vol, veh/h	0	2	1	0	2	0	0	14	1	0	97	11
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	62	62	62	62	62	62	62	62	62	62	62	62
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	0	3	2	0	3	0	0	23	2	0	156	18

Major/Minor	Minor2			Minor1			Major1			Major2		
Conflicting Flow All	211	210	185	212	218	44	184	0	0	35	0	0
Stage 1	175	175	-	34	34	-	-	-	-	-	-	-
Stage 2	36	35	-	178	184	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	746	687	857	745	680	1026	1391	-	-	1576	-	-
Stage 1	827	754	-	982	867	-	-	-	-	-	-	-
Stage 2	980	866	-	824	747	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	729	673	841	727	666	1007	1378	-	-	1561	-	-
Mov Cap-2 Maneuver	729	673	-	727	666	-	-	-	-	-	-	-
Stage 1	819	746	-	972	858	-	-	-	-	-	-	-
Stage 2	967	857	-	811	740	-	-	-	-	-	-	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	10	10.4	0	0
HCM LOS	B	B		

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1378	-	-	721	666	1561	-	-
HCM Lane V/C Ratio	-	-	-	0.007	0.005	-	-	-
HCM Control Delay (s)	0	-	-	10	10.4	0	-	-
HCM Lane LOS	A	-	-	B	B	A	-	-
HCM 95th %tile Q(veh)	0	-	-	0	0	0	-	-

Intersection	
Int Delay, s/veh	6.9

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↰	↱		↰	↱			✥			✥	
Traffic Vol, veh/h	14	31	0	0	44	1	0	0	0	6	0	165
Future Vol, veh/h	14	31	0	0	44	1	0	0	0	6	0	165
Conflicting Peds, #/hr	10	0	10	10	0	10	10	0	10	10	0	10
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	500	-	-	380	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	78	78	78	78	78	78	78	78	78	78	78	78
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	18	40	0	0	56	1	0	0	0	8	0	212

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	67	0	0	50	0	0	259	153	60	153	153	77
Stage 1	-	-	-	-	-	-	86	86	-	67	67	-
Stage 2	-	-	-	-	-	-	173	67	-	86	86	-
Critical Hdwy	4.12	-	-	4.12	-	-	7.12	6.52	6.22	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.12	5.52	-	6.12	5.52	-
Follow-up Hdwy	2.218	-	-	2.218	-	-	3.518	4.018	3.318	3.518	4.018	3.318
Pot Cap-1 Maneuver	1535	-	-	1557	-	-	694	739	1005	814	739	984
Stage 1	-	-	-	-	-	-	922	824	-	943	839	-
Stage 2	-	-	-	-	-	-	829	839	-	922	824	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1520	-	-	1542	-	-	527	715	986	791	715	965
Mov Cap-2 Maneuver	-	-	-	-	-	-	527	715	-	791	715	-
Stage 1	-	-	-	-	-	-	903	806	-	923	831	-
Stage 2	-	-	-	-	-	-	641	831	-	902	806	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	2.3	0	0	9.9
HCM LOS			A	A

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	-	1520	-	-	1542	-	-	958
HCM Lane V/C Ratio	-	0.012	-	-	-	-	-	0.229
HCM Control Delay (s)	0	7.4	-	-	0	-	-	9.9
HCM Lane LOS	A	A	-	-	A	-	-	A
HCM 95th %tile Q(veh)	-	0	-	-	0	-	-	0.9

ATTACHMENT B

Agencies Comment Letters

EEC ORIGINAL PKG.

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

IMPERIAL COUNTY CALIFORNIA 1907

AIR POLLUTION CONTROL DISTRICT

May 21, 2020

Jim Minnick
Planning & Development Services
801 Main Street
El Centro, CA 92243

SUBJECT: 3rd Revision for the application for the Conditional Use Permit (CUP) 20-0002—Fondomonte California, LLC

Dear Mr. Minnick,

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review the 3rd revision to the application for Conditional Use Permit (CUP) 20-0002 ("Project") which included attachment 1 & 2; the modification to the Air Quality Assessment which are reflected in the report and document previously sent on March 10, 2020.

In order for the Air District to understand the use of the Air Study and its applicability to the identified non-compliance issues the Air District would like to quickly correct what looks like an incorrect address.[1] 6456 Blair Road pertains to APN 023-030-001 and is not permitted by the Air District. Addresses 6546 Blair Road (APN 020-030-009) and 6850 Blair Road (APN 022-180-008) each are permitted with the Air District, #4443 and #4533 respectively.[2]

The Air District responded to the original request for review and comments released March 6, 2020 in a letter dated March 19, 2020 by reviewing 1) the effect of the compliance efforts to the existing permits, 2) by reviewing any triggers to permit amendments caused by any compliance effort and 3) emissions implications beyond permitting authority, i.e. on road vehicle traffic attracted to the facility as a consequence of the compliance efforts.

---

[1] OB-a Air Analysis, prepared for Ericsson-Grant, Inc., Air Quality Impact Assessment; Fondomonte Blair Ranch Site 1, page 1 (PDF pg 10), subsection 1.3

[2] Air District permit #4443 is a full footprint permit for the Fondomonte while Air District permit #4533 is only for two emission units and is not a full footprint permit (see attached map).

First, the Air District appreciates the response and clarification provided by Fondomonte regarding the request for a formal letter from the applicant regarding new activities, construction or installation of equipment. The letter from the Air District specifically requested "...a formal letter from the applicant that no new activities, construction, or installation of equipment will take place at BRS1 with the approval of this new CUP." This effectively addresses points 1 and 2 mentioned above.

With regard to the third point. The Air District requested "...an Operational NO_x Emission Analysis of all Off Road and On Road Peak Months Vehicle Emissions" to help bridge the gap of the lack of background information regarding the emissions analysis.[3] Unfortunately, the request should not have included Off Road emissions. For that part of the request we apologize. In any event, the Air District did not receive such an analysis which would have included emissions from actual truck trips (with and without loads, both ways), and not based simply from the "Project's Traffic Impact Analysis (TIA)."[4] The analysis would be specific to operations and encompass the life of the project. The analysis would ideally close the gap of missing information by explaining issues such as why the T7 Ag, Heavy-Duty Truck model was used, how the facility would control the nonuse of out of state carriers, and why the assumptions for travel distances only allotted one mile for travel to Long Beach to name a few.[5] Since this analysis is an operational analysis and the issue at hand is a compliance issue, the Air District has no issue with Fondomonte moving forward with compliance.

Air District Rules and Regulations are available via the web at www.co.imperial.ca.us/AirPollution under Resources.

Respectfully Submitted,

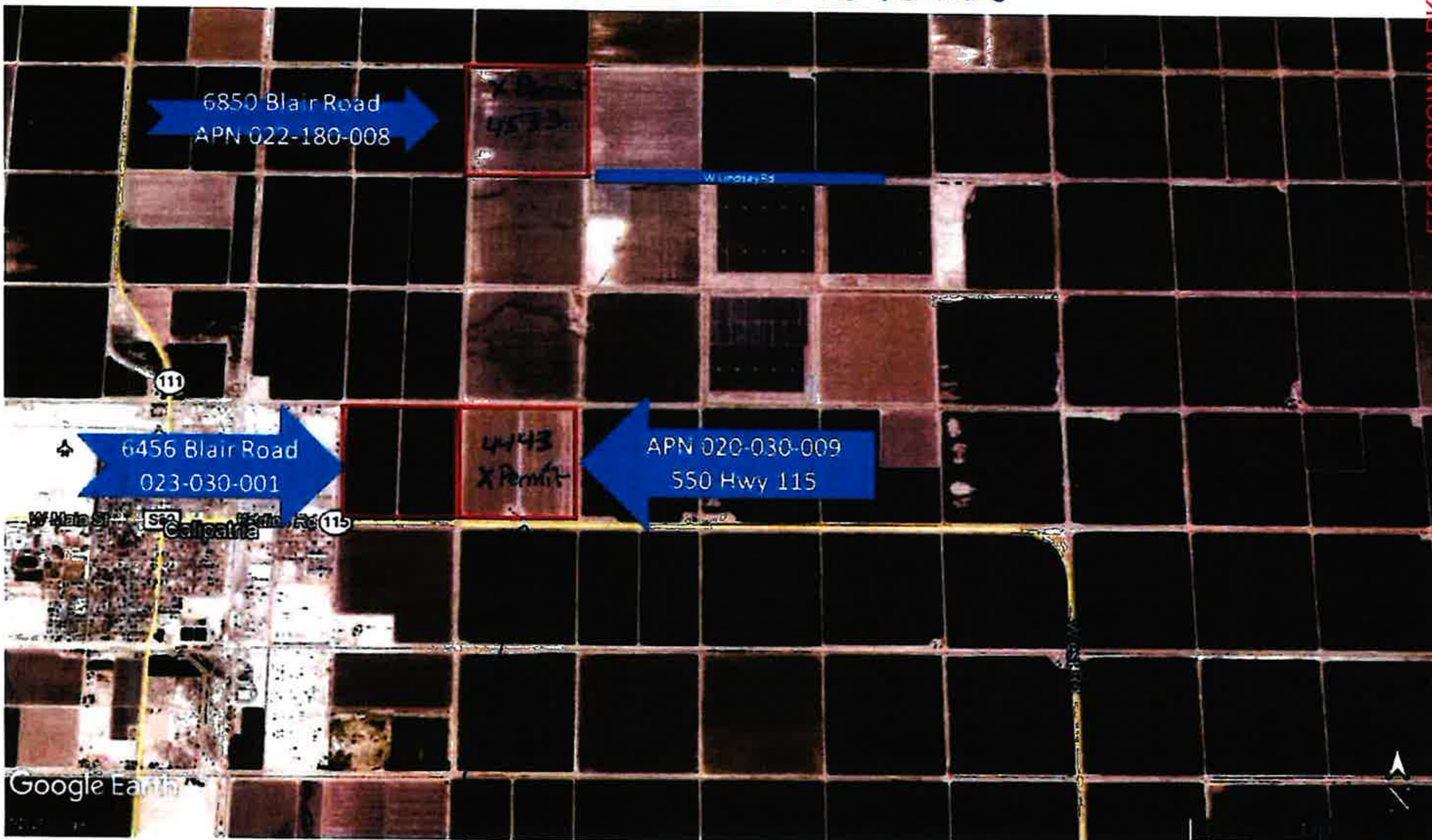
Monica N Soucier

Monica N. Soucier
APC Division Manager

[3] OB-a Air Analysis, prepared for Ericsson-Grant, Inc., Air Quality Impact Assessment; Fondomonte Blair Ranch Site 1, page 2 (PDF pg 11), subsection 1.5.
[4] OB-a Air Analysis, prepared for Ericsson-Grant, Inc., Air Quality Impact Assessment; Fondomonte Blair Ranch Site 1, page 25 (PDF pg 36), subsection 5.1.2.
[5] OB-a Air Analysis, prepared for Ericsson-Grant, Inc., Air Quality Impact Assessment; Fondomonte Blair Ranch Site 1, page 28 (PDF pg 39), *Project Related Operational Emissions*

5/21/2020

Conditional Use Permit 20-0002
Fondomonte California



Permit #4443 = 6546 Blair Road

Air Quality and Greenhouse Gas Calculations Methodology

Assumptions

- All mileages were determined by using Google Earth's Path Measurement tool
- Inbound travel was presented as "In County" for criteria calculations and "Total" for GHG calculations
- Inbound percentage distribution provided by client
- Employee & Miscellaneous distribution was best guess

Old Off-Road Diesel Equipment List

- Make/Model information and operational schedule supplied by client
- Where not directly supplied by client, CalEEMod defaults were used for BHP

Operational Entrained Road Dust

- Methodology and assumptions are provided on Table

EMFAC2017 (v1.0.2) Emission Rates

- MY2010 emission factor data was used for weighted average for company-owned fleet for shuttle between BSR1 and BSR2 and for outgoing to AAG

EMFAC2017 (v1.0.2)

- Emission factors from ARB's Web database
- EMFAC Model Year and Speed were aggregated
- EMFAC Season was Annual
- EMFAC Running Exhaust Factors only were used except for brake & tire wear for PM_{10} and $PM_{2.5}$
- Employees & Miscellaneous activity EMFAC2011 Vehicle Categories were assumed to be Light Duty Auto & Trucks
- Weighted average emissions factors were generated based on VMT per vehicle/fuel entry
- MH Vehicle Type does not seem to be used anywhere in calculations
- Inbound trucks were not owned by company, so generic T7 single factors were used
- Shuttle and outbound trucks were company-owned by weighted average. Specific MY data and VMT were supplied by client

Off-Road Diesel Equipment

- Methodology and assumptions are provided on Table

Operational Off-Road Diesel Emissions

- Formula for Criteria emissions is BHP * LF * hrs/day * EF / grams per pound
- Formula for GHG emissions BHP * LF * annual hrs * EF / 1,000,000
- 6 days per week = 313 workdays per year

Operational On-road Emissions

- VMT/day use only "In County" mileage for Inbound trucks

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- **VMT/year used total mileages for Inbound trucks**
- **Looks like mileages were only for 1-way mileages. VMT for shuttle and outbound trucks; and employees should be double to reflect round trips. Inbound will still only be one way because trucks potential for not returning empty, no deadheading. New Version will be sent!**

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

AIR POLLUTION CONTROL DISTRICT

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

IMPERIAL COUNTY CALIFORNIA

March 19, 2020

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MAR 19 2020
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Jim Minnick
Planning & Development Services
801 Main Street
El Centro, CA 92243

SUBJECT: Conditional Use Permit (CUP) 20-0002—Fondomonte California, LLC

Dear Mr. Minnick,

The Imperial County Air Pollution Control District ("Air District") would like to thank you for the opportunity to review the application for Conditional Use Permit (CUP) 20-0002 ("Project") which addresses non-compliance issues. The Project address is 6546 Blair Road in Calipatria, California (also described as Assessor Parcel Number 023-030-009-000).

The Air District offers the following comments within the context of policies, rules and regulations and in light of the Air District's permitting authority.

First, some clarification is necessary. The Air District valid permit 4443A-1 allows operation at the Project site 24 hours a day, seven days a week, during 52 weeks of the year. Processed forage is not permitted to exceed 1,100 tons per day. Permit 4443A-1 regulates only Blair Ranch Site 1 (BRS1) where compressing facilities are located and not BRS2 which is used exclusively for forage storage. Based on the permitted allowance of the current operation there does not appear to be a trigger that would require an amendment to the permit. Nor does there appear to be any intention to install new pumps, generators, or compressors. However, to ensure future adherence to the permitted operations, the Air District requests a formal letter from the applicant that no new activities, construction, or installation of equipment will take place at BRS1 with the approval of this new CUP.

In regards to the Air Quality/Greenhouse Gas Analysis and section 5.1.2—Operational Emissions, Appendix A does not provide sufficient output files that identify changes to defaults, such as season, vehicle category, vehicle model year, etc. (see enclosure for example output file) for all identified vehicle types. Absent this information it is unclear if the analysis was based on only the peak months of operation, or the entire year. Therefore, the Air District requests an Operational NO_x Emission Analysis of all Off Road and On Road Peak Months Vehicle Emissions.

Air District Rules and Regulations are available via the web at www.co.imperial.ca.us/AirPollution **under Resources.**

Sincerely,

Curtis Blondell

Curtis Blondell
APCD Environmental **Coordinator**

Reviewed by,
Monica Soucier
APC Division Manager

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SAMPLE OUTPUT FILE

EMFAC2017 (v1.0.2) Emissions Inventory
Region Type: Air District
Region: IMPERIAL COUNTY APCD
Calendar Year: 2016
Season: Annual
Vehicle Classification: EMFAC2011 Categories
Units: miles/day for VMT, tons/day for Emissions, 1000 gallons/day for Fuel Consumption

Region	Calendar Y	Vehicle Cat	Model Yea	Speed	Fuel	VMT	ROG_RUNE	TOG_RUNE	CO_RUNEX	NOx_RUNE	CO2_RUNE	CH4_RUNE	PM10_RUI	PM2_5_RL	N2O_RUNEX
IMPERIAL (	2016	LDA	Aggregatec	5	GAS	1515.185	0.000382	0.000541	0.00499	0.000351	1.261364	8.51E-05	1.89E-05	1.74E-05	2.89E-05
IMPERIAL (	2016	LDA	Aggregatec	5	DSL	8.875678	3.01E-06	3.43E-06	3.35E-05	3.34E-06	0.006008	1.40E-07	1.17E-06	1.12E-06	9.44E-07
IMPERIAL (	2016	LDT1	Aggregatec	5	GAS	175.0485	0.000145	0.000201	0.001925	0.000154	0.173399	2.90E-05	5.29E-06	4.88E-06	9.21E-06
IMPERIAL (	2016	LDT1	Aggregatec	5	DSL	0.150462	1.94E-07	2.21E-07	7.67E-07	1.72E-07	0.000177	9.03E-09	1.58E-07	1.51E-07	2.79E-08
IMPERIAL (	2016	LDT2	Aggregatec	5	GAS	563.8561	0.000244	0.000341	0.003258	0.000331	0.622428	5.13E-05	8.67E-06	7.99E-06	2.07E-05
IMPERIAL (	2016	LDT2	Aggregatec	5	DSL	1.352264	5.67E-07	6.46E-07	3.22E-06	3.83E-07	0.001239	2.63E-08	1.84E-07	1.76E-07	1.95E-07
IMPERIAL (	2016	MH	Aggregatec	5	GAS	0.370183	4.53E-07	6.35E-07	7.77E-06	6.09E-07	0.00172	9.19E-08	6.42E-09	5.92E-09	3.22E-08
IMPERIAL (	2016	MH	Aggregatec	5	DSL	0.08805	1.11E-07	1.27E-07	2.34E-07	1.64E-06	0.000207	5.17E-09	4.17E-08	3.99E-08	3.25E-08
IMPERIAL (	2016	T7 Single	Aggregatec	5	DSL	0.486397	1.71E-06	1.94E-06	3.06E-06	1.06E-05	0.002023	7.93E-08	2.79E-07	2.67E-07	3.18E-07

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COUNTY OF IMPERIAL

PUBLIC HEALTH DEPARTMENT

JANETTE ANGULO, M.P.A.
Director

STEVEN MUNDAY, M.P.H., M.S.
Health Officer

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MAR 18 2020

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

March 10, 2020

Mariela Moran, Planner IV
IC Planning & Development Services
801 Main Street
El Centro, CA 92243

Subject: Environmental Health Comments for Proposed Conditional Use Permit #20-0002

Dear Ms. Moran:

The Imperial County Division of Environmental Health (DEH) is providing the comments below in response to the request for review and comments for Conditional Use Permit #20-0002. The project as described is replacing existing Conditional Use Permit #16-0017, to increase the number of employees to 100 and increase the number of hay hauling trucks from 60 to 100 per day, at 6546 Blair Road, Calipatria CA. The property is also described as Assessor's Parcel Number 023-030-009-000. Our files show this company has three septic systems at two of their two facilities with the following treatment capacities.

1. 550 Highway 115, Calipatria CA. APN# 023-030-009 with a max. capacity of 25 employees or 500 gallons per day.
2. 6546 Blair Road, Calipatria CA. APN# 023-030-009 with a max. capacity of 14 employees or 280 gallons per day.
3. 6546 Blair Road, Calipatria CA. APN# 022-180-008 with a max capacity of 12 employees or 250 gallons per day.

Based on the above information we have on file, please consider the following comments for the proposed project.

1. The applicant must upgrade their septic systems to support the proposed 100 employees at their sites and thereby comply with Imperial County Ordinance 8.80.170.B(2) which states:

    For non-residential facilities, the design flow rate [of septic systems] shall be based on estimated wastewater flow rates specified in the California Plumbing Code or EPA OWTS Manual, or based on the number of plumbing fixture units, whichever is greater for the type of building occupancy.

OR

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2. The applicant may commission a qualified professional, as defined in Imperial County Ordinance 8.80.030, to conduct a study at each septic system to ascertain actual flows, as opposed the estimated flows, which were used to determine each septic systems' treatment capacities. The qualified professional's findings on actual usage shall support the notion that each septic system's treatment capacity, in gallons per day, as noted above, shall not be exceeded by serving 100 employees per day. In doing so the applicant's proposed expansion shall comply with the second sentence of Imperial County Ordinance 8.80.170.B(2) which states:

   > Any deviations [in septic system design flow rate] shall be supported by appropriate water usage information and/or the use of low water use fixtures or gray water system

If you have any questions, please do not hesitate to contact me at 442-265-1888.

Sincerely,

Mario Salinas

Mario Salinas
Environmental Compliance Specialist I

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MAR 18 2020
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

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Valerie Grijalva

From: Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>
Sent: Friday, March 6, 2020 1:58 PM
To: Valerie Grijalva
Subject: RE: Request for Comments CUP20-0002

CAUTION: **This email originated outside our organization; please use caution.**

This email is to inform you that we do not wish to comment on this project.

From: Valerie Grijalva [mailto:ValerieGrijalva@co.imperial.ca.us]
Sent: Friday, March 06, 2020 9:20 AM
To: Carlos Ortiz; Sandra Mendivil; Jolene Dessert; Matt Dessert; Monica Soucier; Tony Rouhotas; Esperanza Colio; Jeff Lamoure; Vanessa Ramirez; Jorge Perez; Alphonso Andrade; Mario Salinas; Robert Menvielle; Robert Malek; Andrew Loper; John Gay; Carlos Yee; rbenavidez@icso.org; tgarcia@icso.org; dvargas@iid.com; rleal@iid.com; dkline@calipat.com; perry.dahlstrom@gswater.com; smoorhouse@chp.ca.gov; kathy.perdomo@cdcr.ca.gov; maurice.eaton@dot.ca.gov; beth.landrum@dot.ca.gov; robert.krug@dtsc.ca.gov; historicpreservation@quechantribe.com; tribalsecretary@quechantribe.com; Thomas.tortez@torresmartinez-nsn.gov; Jospeh.mirelez@torresmartinez-nsn.gov; sunil@gswater.com
Cc: Michael Abraham; Carina Gomez; Gabriela Robb; John Robb; Kimberly Noriega; Maria Scoville; Rosa Soto
Subject: Request for Comments CUP20-0002

Good Morning,

Please see attached Request for Comments Packet for **CUP# 20-0002**. Comments are due by **March 21, 2020 at 5:00 PM.**

In an effort to increase the efficiency at which information is distributed and reduce paper usage, the Request for Comments Packet is being sent to you via this email.

Should you have any questions regarding this project, please feel free to contact Planner Mariela Moran at (442)265-1736 ext. 1747 or submit your comment letters to icpdscommentletters@co.imperial.ca.us

Thank you.

Valerie Grijalva
Office Assistant II
Planning and Development Services
801 Main Street
El Centro, CA 92243
Office: (442)265-1779
Fax: (442) 265-1735

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Mariela Moran

From:	Quechan Historic Preservation <historicpreservation@quechantribe.com>
Sent:	Tuesday, April 14, 2020 2:18 PM
To:	Mariela Moran
Subject:	Conditional Use Permit #20-0002

CAUTION: This email originated outside our organization; please use caution.

This email serves to inform you that we wish to make no comments on this project.

H. Jill McCormick, M.A.
Historic Preservation Officer
Ft. Yuma Quechan Tribe
350 Picacho Road
Yuma, AZ 85366
Office: 760-572-2423
Cell: 928-261-0254

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IID

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March 12, 2020

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IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Ms. Mariela Moran
Planner II
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Blair Ranch Site 1 CUP Application No. 20-0002

Dear Ms. Moran:

On September 10, 2019, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on Conditional Use Permit application no. 20-0002. The applicant, Fondomonte California, is requesting the replacement of existing CUP no. 16-0017 to increase the number of employees and total truck hay-hauling capacity per day for their hay processing and storage facility known as Blair Ranch Site 1 located at 6546 Blair Road, Calipatria, California.

The IID has reviewed the application and has the following comments:

1. IID water facilities that may be impacted include D Lateral along the parcel's southern boundary and E Drain along the parcel's northern boundary.

2. The applicant may not use IID's canal or drain banks to access the project site.

3. It appears that there will be no impacts to IID water facilities. However, if impacts should result, the applicant should contact the IID Water Department Engineering Services Section at (760) 339-9265 for impact assessment and mitigation.

4. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at http://www.iid.com/departments/real-estate. The IID Real Estate Section should be contacted at (760) 339-9239 for additional

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information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

5. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities

6. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

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IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Enrique B Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept
Jamie Asbury – Deputy Manager, Energy Dept., Business/Regulatory
Enrique De Leon – Asst. Mgr., Energy Dept., Distr., Planning, Eng. & Customer Service
Vance Taylor – Asst General Counsel
Robert Laurie – Outside Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes. – Supervisor, Real Estate
Jessica Lovecchio – Environmental Project Mgr Sr., Water Dep

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May 8, 2020

Ms. Mariela Moran
Planner II
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Blair Ranch Site 1 Hay Processing Expansion, CUP Application No. 20-0002 (3rd Revision)

Dear Ms. Moran:

On May 7, 2020, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on the 3rd revision of Conditional Use Permit application no. 20-0002. The applicant, Fondomonte California, LLC, is requesting the replacement of existing CUP no. 16-0017 to increase the number of employees and total truck hay-hauling capacity per day for their hay processing and storage facility known as Blair Ranch Site 1 located at 6546 Blair Road, Calipatria, California.

The IID has reviewed the application, including the modification to the project's Air Quality Assessment, and found that the comments provided in the March 12, 2020 district letter continue to apply (see attached letter).

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

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MAY 08 2020
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.
Sandra Blain – Deputy Manager, Energy Dept.,
Jesus Martinez – Engineer Principal, Energy Dept., Transmission Planning
Jamie Asbury – Asst. General Counsel
Vance Taylor – Asst. General Counsel
Robert Laurie – Outside Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dep

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March 12, 2020

Ms. Mariela Moran
Planner II
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: Blair Ranch Site 1 CUP Application No. 20-0002

Dear Ms. Moran:

On March 9, 2020, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on Conditional Use Permit application no. 20-0002. The applicant, Fondomonte California, is requesting the replacement of existing CUP no. 16-0017 to increase the number of employees and total truck hay-hauling capacity per day for their hay processing and storage facility known as Blair Ranch Site 1 located at 6546 Blair Road, Calipatria, California.

The IID has reviewed the application and has the following comments:

1. IID water facilities that may be impacted include D Lateral along the parcel's southern boundary and E Drain along the parcel's northern boundary.

2. The applicant may not use IID's canal or drain banks to access the project site.

3. It appears that there will be no impacts to IID water facilities. However, if impacts should result, the applicant should contact the IID Water Department Engineering Services Section at (760) 339-9265 for impact assessment and mitigation.

4. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at http://www.iid.com/departments/real-estate. The IID Real Estate Section should be contacted at (760) 339-9239 for additional

information regarding encroachment permits or agreements. No foundations or buildings will be allowed within IID's right of way.

5. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope of all existing canals and drains. Where space is limited and depending upon the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities can be maintained and are not impacted and if impacted mitigated. Thus, IID should be consulted prior to the installation of any facilities adjacent to IID's facilities. Certain conditions may be placed on adjacent facilities to mitigate or avoid impacts to IID's facilities

6. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, etc.) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept
Marilyn Del Bosque Gilbert – Manager, Energy Dept
Jamie Asbury – Deputy Manager Energy Dept., Business/Regulatory
Enrique De Leon – Asst Mgr., Energy Dept., Distr., Planning, Eng & Customer Service
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CITY OF HOLTVILLE

121 WEST FIFTH STREET

HOLTVILLE, CALIFORNIA 92250-1298 • (760) 356-2912

"THE CARROT CAPITAL OF THE WORLD"

June 10, 2020

Mariela Moran, Planner II
Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243

RE: REQUEST FOR COMMENTS FOR THE BLAIR RANCH SITE EXPANSION LOCATED AT THE NORTHEAST CORNER OF BLAIR ROAD AND HIGHWAY 115 (APN 023-030-009)

Dear Ms. Moran,

The City of Holtville received your Request of Review and Comments for the above referenced project. We have reviewed the project overview and studies and would like to provide the following comments:

Estimated Increase of Inbound Trucks: The Truck Routes Map of the Traffic Impact Analysis (attached) depicts the existing truck routes traveling to the project sites. According to the map, the intersection of Orchard Road and 4th Street (within Holtville jurisdiction) is classified as an existing truck route and access way for trucks traveling from Yuma, AZ to Highway 115. Considering the dilapidated conditions of the intersection, the proposed project raises some concerns as to whether the intersection is equipped to receive an influx of inbound trucks traveling to the project site. The City would like to receive an estimated increase of trucks that would be traveling west from Yuma and to Highway 115.

We kindly ask that any information that would be helpful in addressing the comments above be sent via email at jgalvan@theholtgroup.net or by mail to our office located at 1601 North Imperial Avenue, El Centro, CA 92243. We thank you in advance for your time and if you have any questions regarding this communication, please feel free to contact me at (760) 337-3883 or via email.

Sincerely,

Jeorge Galvan, AICP
City Planner

cc: Nicholas D. Wells, City Manager
THG 116.047

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City of Calipatria

125 North Park Ave.
Calipatria, CA 92233
Telephone: (760) 348-4141
Fax: (760) 348-7035

June 10, 2020

Mariela Moran, Planner II
Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243

RE: REQUEST FOR COMMENTS FOR THE BLAIR RANCH SITE EXPANSION LOCATED AT THE NORTHEAST CORNER OF BLAIR ROAD AND HIGHWAY 115 (APN 023-030-009)

Dear Ms. Moran,

The City of Calipatria received your Request of Review and Comments for the above referenced project. We have reviewed the project overview and studies and would like to provide the following comments:

Estimated Increase of Inbound Trucks: The Truck Routes Map of the Traffic Impact Analysis (attached) depicts the existing truck routes traveling to the project sites. According to the map, Highway 111 is classified as an existing truck route and access way for trucks traveling from Blythe, CA, Poston, AZ, Yuma, AZ, and the southerly portion of the Imperial Valley, to the project site. In addition, Yocum Road and South Brown Avenue (within the Calipatria jurisdiction) are often used as an alternative route to access the project site. Considering the close proximity to residential homes on Highway 111 and Brown Avenue, the proposed project raises some concerns for an increase in noise level impacts. The City would like to receive an estimated increase of trucks that would be traveling through Highway 111 and to the project site.

We thank you in advance for your time. If you have any questions regarding this communication or need additional information, please feel free to contact me at (760) 337-3883 or via email at jgalvan@theholtgroup.net.

Sincerely,

Jeorge Galvan, AICP
Consultant City Planner

cc: Rom Medina, City Manager
THG 142.030

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From: Denise Marin
To: Mariela Moran
Subject: RE: Request for Review and Comment Letter for CUP20-0002
Date: Wednesday, June 10, 2020 4:41:50 PM
Attachments: image001.png
142.030_6.10.20_Request for Comments_Blair Ranch.pdf
116.047_6.10.20_Request for Comments_Blair Ranch.pdf

CAUTION: This email originated outside our organization; please use caution.

Good Afternoon Mariela,

Thank you for response. I attached the letters that way you have a formal request for comments to present to the committee.

Thank you again for your time.

Respectfully,

DENISE MARIN
Assistant Planner

The Holt Group

Engineering & Planning

1601 N. Imperial Avenue
El Centro, CA 92243

t: (760) 337-3883
f: (760) 337-5997

www.theholtgroup.net

From: Mariela Moran [mailto:MarielaMoran@co.imperial.ca.us]
Sent: Wednesday, June 10, 2020 3:39 PM
To: Denise Marin
Cc: Anastasia Miki
Subject: FW: Request for Review and Comment Letter for CUP20-0002

Good afternoon Denise,

I reached out the consultant and she provided me the answer in the email below and the attached Excel Sheet for your review.

EXISTING ENTITLEMENTS COMPARED TO THE PROPOSED

	16-0017		19-xxxx	Notes for the study teams from the GM				
	Existing CUP entitlements	Existing quantities	Proposed					
Hay Pressed (tons/day)	1100	this varies and balances out annually, but is exceeded regularly on the daily due to maintenance	1100 st/1000 mt					
presses	2	2	2					
Raw hay stored onsite	75,000	97,500	110,000 st/100,000 mt					
Annual raw hay processed	400,000	200,000	400,000	In reality we do not process more than 312,000 mt annually: 1100 st/1000 mt per day/ 6 days a week/ 52 weeks a year				
Double trailer Truck Round Trips to site	60	110	100 peak/24 low	We need to consider seasonal volumes. 100 trucks round trips max per day, 6 days a week through peak season 4/31 - 8/31. The remainder of the year max will be 60 per day , 6 days a week. True low season with 24 rt per day, 5 days a week, November- March. We don't want tolimit ourselves with no sundaty operation, but will likely not recieve Sunday deliveries for the foreseeable future. Daily truck round trips between Site 1 & 2will be consistently throughout the year at max 60 per day. Hourly movements based on a 10 hour work day.	40	32	in bound from south trips	13
Container Truck Trips out	50	88	60	Once the bridge is in place at the AAG rail dite our max daily truck round trips to the AAG rail will be 60, in reality this will be 50 per day because we will not longer be limited to the current 3 days per week to lad and deliver our containers to the rail. This is tentatively scheduled to be in place before the end of 2019. Baes the max hourly movements on a 10 hour work day for truck container movements		32	in bound from north trips	13
Employee round trips	49	210	100	Based on a total employment of 100		10	yuma	4
Dust Collector		12,000 cfm				23.36	blythe	9
Working hours	24 hrs	16	24 hrs			2	poston	1
Employees	49	100	100	Best to build around 100 employees between the stack yard and press site. In reality it maxes out at 95.				

Press	5am-3 pm	21 employees	28%
	4pm- 2 am	7 employees	9%
Office	8 am-5pm	8 employees	11%
Scale	6 am – 2 pm	4 employees	5%
Security	6 am – 2 pm	3 employees	4%
	2 pm – 10pm	2 employees	3%
	10 pm- 6 am	2 employees	3%
Shop	6 am -3 pm	6 employees	8%
Yard	6 am -3 pm	11 employees	15%
*AAG	Rail Spur/Drivers 6 am -3 p	11 employees	15%

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Should you have any questions please let us know.

Thank you

From: Anastasia Miki <a.miki@rpeng.net>
Sent: Wednesday, June 10, 2020 3:32 PM
To: Mariela Moran <MarielaMoran@co.imperial.ca.us>
Subject: RE: Request for Review and Comment Letter for CUP20-0002

CAUTION: This email originated outside our organization; please use caution.

Good afternoon Mariela,
The short answer is 13 trips per day at the peak of the season. We spread out the trips so it wont be all at one time.

I have added the distribution to the entitlement chart attached in column k, row 7.

Anastasia Miki, P.E.
WRA Consulting Engineers
208-818-7508

From: Anastasia Miki <a.miki@rpeng.net>
Sent: Wednesday, June 10, 2020 2:44 PM
To: 'Mariela Moran' <MarielaMoran@co.imperial.ca.us>
Subject: RE: Request for Review and Comment Letter for CUP20-0002

Anastasia Miki, P.E.
WRA Consulting Engineers
208-818-7508

From: Mariela Moran <MarielaMoran@co.imperial.ca.us>
Sent: Wednesday, June 10, 2020 12:07 PM
To: Anastasia Miki <a.miki@rpeng.net>
Subject: FW: Request for Review and Comment Letter for CUP20-0002

Good afternoon Anastasia,

We received comments from the City of Calipatria, could you please provide a response?

Thank you

From: Denise Marin <dmarin@theholtgroup.net>
Sent: Wednesday, June 10, 2020 10:15 AM

To: Mariela Moran <MarielaMoran@co.imperial.ca.us>
Subject: RE: Request for Review and Comment Letter for CUP20-0002

CAUTION: This email originated outside our organization; please use caution.

Good Morning Mariela,

We are in the process of reviewing the project referenced below to provide comments and I was wondering if you could help me with something. Would you happen to have any data showing the number of inbound trips that would increase for trucks going through HW 115 (within Holtville jurisdiction) and HW 111 (within Calipatria jurisdiction).

As shown in the attached map from the report, trucks coming in from Yuma are coming in via I-8, then getting off on Orchard Road to Holtville and then on to HW 115 to the project site. We would like to know how many additional trucks are going to pass through Holtville as the intersection of Orchard and 4th Street is dilapidated and we would like to get an idea of how many trucks would be passing through that portion.

Also, trucks coming in from the southern Imperial Valley and Yuma are traveling on HW 111 through Calipatria. The number of trucks would give us an idea of noise impact for the residences along 111 (Sorenson).

I hope I explained myself well. If you are able to provide this information, I would greatly appreciate it.

Respectfully,

DENISE MARIN
Assistant Planner

The Holt Group
Engineering & Planning

1601 N. Imperial Avenue
El Centro, CA 92243

t: (760) 337-3883
f: (760) 337-5997

www.theholtgroup.net