

Executive Order (E.O.) 11988 Analysis

408 Permission (No. 19552) Central Valley Flood Protection Board for the Sanchez Property Industrial Development San Joaquin County, CA

References

- Central Valley Flood Protection Board Permit Application dated November 17, 2020.
- Executive Order (E.O.) 11988 ANALYSIS, Sanchez Industrial Development, Weber Slough Drainage Outfall, Channel Widening and Rock Slope Protection, Farmington Project Authorization submitted by BaseCamp Environmental Inc. in support of the request for Section 408 Permission (Attachment 1).
- Engineering Circular (EC) 1165-2-220, Policy and Procedural Guidance for Processing Requests to Alter U.S. Army Corps of Engineers Civil Works Projects Pursuant to 33 U.S.C 408.
- Engineering Regulation (ER) 1165-2-26, Implementation of Executive Order 11988 on Floodplain Management.
- Water Resources Council, Floodplain Management Guidelines for Implementing E.O. 11988, 10 February 1978 (43 FR 6030).

Background & Introduction

The Central Valley Flood Protection Board (CVFPB) has requested review under Section 14 of the Rivers and Harbors Act of 1899, 33 U.S.C. § 408 (Section 408) for ET Stockton Owner, LLC to alter the Farmington Project (which includes improvements to the Littlejohn Creek Channel and its tributaries), authorized by the Flood Control Act of 1944, Public Law No. 534, 78th Congress, Second Session. The proposed Sanchez Property Industrial Development alteration includes construction of an outfall structure, channel widening, and installation of rock slope protection located on Weber Slough, within San Joaquin County, CA. The proposed alterations are located southeast of the City of Stockton at approximately 37.908465°N 121.188658°W NAD83 within San Joaquin County, CA.

E.O. 11988 requires USACE to provide leadership and take action to (1) avoid development in the base floodplain (1-in-100 annual event) unless such development is the only practicable alternative; (2) reduce the hazards and risk associated with floods; (3) minimize the effect of floods on human safety, health, and welfare; and (4) restore and preserve the natural and beneficial values of the base floodplain.

The Water Resources Council Floodplain Management Guidelines for implementation of E.O. 11988, as referenced in USACE's Engineer Regulations 1165-2-26, requires an 8-step process that agencies are to carry out as part of their decision

making on projects that have potential impacts to or within the floodplain. The project proponent prepared and submitted the *Executive Order (E.O.) 11988 ANALYSIS, Sanchez Industrial Development, Weber Slough Drainage Outfall, Channel Widening and Rock Slope Protection, Farmington Project Authorization* in support of the request for Section 408 Permission (Attachment 1). The following sections discuss the 8-step analysis undertaken by USACE to comply with E.O. 11988.

Scope of Review for this EO 11988 Analysis

Due to differences in the implementing policies for Section 408 and EO11988, the scopes of the two reviews differ. This section discusses the scopes of each review.

Scope of Section 408 Review – The scope of a Section 408 review is intended to reflect USACE jurisdiction and therefore focuses on proposed actions within the Federal project footprint and adjacent areas that are directly or indirectly affected by the alteration. The actions subject to 408 permission (hereafter 408 Alteration Components) include installation of two (2) 18-inch diameter storm drain pipes and outfall structure; installation of a 48-inch diameter storm drainpipe crossing approximately 10 feet below the channel; installation of two (2) 4 feet by 10 feet box culverts adjacent to Austin Road; modification of an existing box culvert, associated channel widening along Austin Road; installation of riprap; and removal of two (2) dilapidated farm road crossings. Although the proposed 408 Alteration Components are a component of the larger 149-acre Sanchez Property Industrial Development Project (Project), only the proposed 408 Alteration Components would represent a direct alteration to the Federal project. Therefore, the scope of the Section 408 review and any subsequent authorization is limited to construction and operation of the proposed 408 Alteration Components. This scope is consistent with the request #19552 by the Central Valley Flood Protection Board for review of the proposed action under Section 408.

Scope of EO 11988 Analysis – Compliance with EO 11988 is a required component of all USACE actions, including review and authorization of proposed alterations under Section 408. ER 1165-2-26 provides the general guidance and policy for USACE's implementation of EO 11988. EO 11988 has as an objective for avoidance, to the extent possible, of long-and short-term adverse impacts associated with the occupancy and modification of the base floodplain and the avoidance of direct and indirect support of development in the base floodplain wherever a practicable alternative exists. ER 1165-2-26 defines direct support of floodplain development as an action in the floodplain that encourages, allows, serves, or otherwise likely induces additional floodplain development.

USACE's action is limited to Section 408 review and authorization of the stormwater outfall; however, because the stormwater outfall directly serves, and is integral to, the development of the adjacent 149-acre site, the associated development will be included in the EO 11988 analysis as a component of the proposed action. In summary, the action under evaluation in this EO 11988 analysis is the proposed construction of the

408 Alteration Components and adjacent 149-acre site. The action, as defined, will serve as the basis for evaluation of alternatives and application of tests of practicability.

8 Step Analysis

1. Determine if the proposed action is in the base floodplain.

The majority of the proposed action area is located within the Federal Emergency Management Agency's (FEMA) designated 100-year flood zone (base floodplain) as identified in the effective Flood Insurance Rate Maps (FIRMs) Panel Numbers 06077C0490F & 06077C0495F (Figure 1). The proposed alterations to the USACE federal project are entirely located within the FEMA designated base floodplain (Figure 2).

2. If the action is in the base floodplain, identify and evaluate practicable alternatives to the action or to location of the action in the base floodplain.

The Water Resources Council Floodplain Management Guidelines and ER 1165-2-26 define "practicable" as "capable of being done within existing constraints. The test of what is practicable depends upon the situation and includes consideration of the pertinent factors, such as environment, cost, and project objectives. Alternatives discussed below include the proposed action; alternative actions (other means which accomplish the same purpose as the proposed action); alternative siting (carrying out the proposed action outside the floodplain); and no action. Key considerations in the evaluation of alternatives are summarized below:

- The Project objectives are to implement industrial development of both Phases 1 and 2 of the 149-acre industrial development, including development and installation of an independent stormwater management system meeting the storm drainage needs of both Project phases. The Project objectives include:
 - Construction of a detention basin at the northwest corner of the property, with other interconnected sub-basins, which would accumulate runoff from the Project site for discharge into Weber Slough.
 - Construction of an on-site pump station and outfall adjacent to the slough with electronic control of discharges from the basin.
 - Obtain required permits and approvals for the project, including U. S. Army Corps of Engineers, Section 404 Permit for discharge associated with the construction of the Storm Drainage Pump Station and other modifications to Weber Slough.
 - Expand Norcal Logistics Center east of Logistics Drive, providing land area for further development of industrial warehousing and distribution.
 - Industrial development of the project site in accordance with the Stockton General Plan 2040 land use designations, objectives, goals, and policies.
 - Industrial development in an area supported by existing development-ready infrastructure, including urban streets, potable water, and wastewater systems.

- Comply with natural resource management objectives and policies of the Stockton General Plan 2040, by siting new industrial development where impacts to natural resources are minimized.
- Comply with the urban planning and design objectives and policies of the Stockton General Plan 2040 and Development Code.
- Compliance with Stockton Municipal Code Chapter 15.44 Flood Damage Protection. Conformance with Conditions of Approval for the Project.

Given these considerations and other relevant factors of practicability (ER 1165-2-26 Sec. 7), an alternative action would be considered practicable if it offers a clear advantage over the proposed action (i.e., meaningful reduction in environmental impacts, with a special focus on impacts related to development within the floodplain) while providing a comparable level of benefits (i.e., meeting project objectives).

a. Sanchez Property Industrial Development (Preferred Alternative)

The Proposed Action is light industrial/warehouse development on the 149-acre Sanchez property. Up to 2.8 million square feet of industrial building space is proposed to be developed, along with circulation, parking, and utility improvements. The outfall structure includes a concrete headwall, wingwalls and apron as well as rock slope protection in the bed and opposite bank of Weber Slough. The Proposed Action also includes widening 550 feet of the on-site portion of the Weber Slough channel, including extending the existing concrete box culvert at the slough crossing of Austin Road, adding two concrete box culverts at a proposed driveway, and providing rock slope protection at both ends of the box culverts and at the end of the improved section to reduce erosion.

The purpose of the Project is to specifically serve the City's projected growth areas in the southeastern portion of the City and to complement the surrounding industrial land uses. The City continues to experience population growth and the associated need for additional housing and employment in planned urbanizing areas. The Project is responsive to the City's development objectives and demands of the known industrial market while complying with the policies and programs of the current General Plan, including the need for industrial uses and associated employment.

b. No Action Alternative

The No Action Alternative would retain the 149-acre Project site in its current condition. The Phase 1 area of the site is, at present, largely developed for industrial use. Under the No Action Alternative, no further industrial development would occur, and the current conditions on the property would remain. At the time of City approval, the site was in active agricultural use. However, since City approvals, the northern portion of the site, the Phase 1 area, has been extensively modified and is at this time entirely developed but for the completion of tenant improvements. The eastern portion of this area has been mass graded and developed with a large industrial building; all proposed vehicular circulation and parking has been constructed, and the building and

grounds are being prepared for occupancy by the tenant. The detention basin in the western portion of this area has been constructed, and waste soil from this facility has been moved to and piled along the south bank of Weber Slough in the Phase 2 area between Logistics Drive and Austin Road. The Phase 2 southern portion of the site, south of the soil pile excavated from the detention basin, remains in relatively undisturbed condition and could conceivably continue in agricultural use.

Under the No Action Alternative, the southern portion of the proposed project would not be developed and would remain in its existing agricultural/open space use. Under this alternative, construction of the drainage outfall and widening improvements along Weber Slough would not occur. The proposed outfall is an essential improvement for completion of development of the portion of the site north of Weber Slough, which is designed to provide on-site detention of runoff but not to retain runoff long-term. Lack of the outfall may strand existing development north of Weber Slough without adequate storm drainage capacity, potentially resulting in periodic on-site flooding. Existing hydrologic conditions along Weber Slough would remain, including overtopping of its channel, and periodic flooding of this remaining undeveloped portion of the site.

Under the No Action Alternative, the onsite detention basin would not be constructed. This detention basin, servicing the entire project site, also attenuates flows into Weber Slough, and has been shown to provide post project flows that are equal to or less than pre project flows into Weber Slough. The improvements associated from the detention basin, as well as pump station and outfall would not be constructed. Additionally, the widening of the channel near Austin Road would not be constructed, which would continue to contribute to local flooding.

The financial objectives of the City and the community as approved in the Stockton General Plan and Sanchez Property Industrial Development project approvals would not be realized. There would be no further generation of employment opportunities in the industrial, commercial and construction sectors. There would be no further increase in the appraised value of the land and no increase in property taxes to assist funding the City's provision of general services, including the services necessary to serve the Project. The financial objectives of the applicant and other industrial users would only partially be met. Operation of industrial uses in the northern portion of the site would be complicated by lack of adequate storm drainage capacity.

While the No Action alternative would be environmentally preferable to the proposed action, the No Action alternative would not meet any project objectives and therefore is not a practicable alternative to the proposed action.

c. Non-Floodplain Alternative

The non-floodplain alternative involves the relocation of proposed development out of the designated floodplain. Since the entire Project site is located within a Special Flood Hazard Area, designated Zone A, Zone AE, and Zone AO, there are no on-site non-floodplain areas to which development could be moved.

For an alternative site to be considered practicable, it must be able to accommodate the same level of industrial development as the Sanchez property under the Proposed Action. Therefore, the proposed industrial development of approximately 149 acres would occur at the alternative site.

No such alternative sites exist. Industrial growth areas in the southern portion of the City, including the Project site, are predominantly located in the floodplain, and no sites suitable to accommodate the Project are located in the City. A City of Stockton study of site availability conducted in conjunction with the annexation of the project site found that industrial parcel availability was extremely limited; the largest such parcel was only 70 acres in size.

Consequently, there are no practicable non-floodplain alternatives for the Project because it is situated exactly where the growth is planned and necessary on land that is planned, designated, and zoned for the proposed land use.

d. Alternative Action Alternative

Construction of a storm water retention basin as an alternative to the proposed detention basin would also mitigate Project impacts to Weber Slough. A retention basin would not require an outfall into the Weber Slough because stored stormwater would be retained on-site and slowly percolate into native soils instead. A retention basin was initially a desirable design option, however geotechnical analysis of the existing soils at the basin site revealed poor soils and infiltration (clayey soils) rates up to a depth of approximately 25 feet below the existing ground surface. To compensate for these reduced infiltration rates, the theoretical retention basin bottom/percolation surface area, and thus the overall project footprint, would need to be significantly larger than the proposed detention basin bottom and top areas to achieve full percolation within the City of Stockton's prescribed 10-day requirement following the design storm. This would also carry a substantial impact on useable site area, building area, and come at a much larger cost.

Engineering evaluation by project engineer Kier and Wright indicated that development of a retention basin on the Project site would not be feasible. This conclusion is consistent with information in the project Environmental Impact Report (EIR), which notes that the clay soils underlying the Project site have slow permeability, and thus slow infiltration of runoff into the ground therefore this is not a practicable alternative to the proposed action.

3. If the action must be in the floodplain, advise the general public in the affected area and obtain their views and comments.

A public notice was conducted by USACE in accordance with EC 1165-2-220. USACE posted a 30-day public notice, with the comment period ending July 23, 2021, to the Sacramento District's website and emailed a notification to potentially interested parties, advising interested parties of the proposed action and soliciting information necessary to inform USACE's evaluation and review. One comment was received from the Central Valley Regional Water Quality Control Board (CVRWQCB). The CVRWQCB

identified water quality permits potentially required prior to construction of the proposed Sanchez Property Industrial Development. The CVRWCB issued a Section 401 Water Quality Certification (WDID#5B39CR00334) on October 05, 2020. This E.O. 11988 Analysis will be posted to the USACE Sacramento District website.

4. Identify beneficial and adverse impacts due to the action and any expected losses of natural and beneficial floodplain values. Where actions proposed to be located outside the base floodplain will affect the base floodplain, impacts resulting from these actions should also be identified.

Beneficial Impacts – The proposed action key anticipated benefits are summarized below:

- Generate employment opportunities in the industrial, commercial and construction sectors.
- Comply with natural resource management objectives and policies of the Stockton General Plan 2040, by siting new industrial development where impacts to natural resources are minimized.
- Comply with Stockton Municipal Code Chapter 15.44 Flood Damage Protection. Post project flows are equal to or less than the pre-project flows
- Increase the appraised value of the land, potentially increase property taxes that are expected to assist funding the City's provision of general services
- Be developed in an area furnished with existing development-ready infrastructure, including urban streets, potable water and wastewater systems.
- Improve the hydraulic capacity of Weber Slough downstream of the project during peak flows.

Adverse Impacts – Analysis of the proposed action identified potential adverse impacts to traffic and circulation, air quality (including climate change related to GHG emissions), and land use (including a loss of important agricultural lands). Adverse impacts associated with the proposed action are summarized below:

- Undeveloped agricultural lands will be committed to urban development.
- Air quality will be incrementally degraded. Project emissions will contribute towards the exceedance of ROG levels over the long-term operation of the project. On a cumulative basis, construction will adversely affect fugitive dust levels and construction pollutants and contribute to the non-attainment status of the County.
- Additional impermeable surfaces and increases in runoff will occur.
- New sources for potential surface water pollution will be introduced.
- Potential habitat will be lost with implementation of the project.
- Incremental increases in ambient noise levels will occur.
- Agricultural lands will be irretrievably lost.
- Additional traffic will be generated by site land uses, and incremental increases in local and regional congestion will occur.
- Increased levels of public services will be required to serve the proposed action.

- Water supplies for consumption, sewage treatment, and other utility resources will be permanently committed to the project site.
- The current rural agricultural character of the site will be committed to industrial uses. Light effects will incrementally affect the night sky.
- There is potential for disturbing potentially unknown historic and prehistoric cultural resources through site development and occupation.

Expected losses of natural and beneficial floodplain values – The proposed action would result in loss of natural and beneficial floodplain values due to a permanent change in land use. Impacts related to a change in land use include, but are not limited to, loss of habitat or degradation of adjacent habitats, an increase in impermeable surfaces which alters natural hydrology and reduces groundwater recharge, and an increase in conflicts with incompatible adjacent land uses. The proposed action would also result in impacts to the natural and beneficial floodplain values due to construction related impacts, including, but not limited to potential degradation of water and air quality.

5. If the action is likely to induce development in the base floodplain, determine if a practicable non-floodplain alternative for the development exists.

The proposed action would result in development of a 149-acre site which is located within the base floodplain. Furthermore, construction of the stormwater outfall and development of the 149-site would also likely encourage additional development with the surrounding floodplain. The analysis in step 2 above demonstrates that a non-floodplain alternative is not practicable.

6. Determine viable methods to minimize any adverse impact of the action including any likely induced development for which there is no practicable alternative and methods to restore and preserve the natural and beneficial floodplain values. This should include reevaluation of the "no action" alternative.

Construction of the Detention Basin and Outfall - The construction of the stormwater detention basin and outfall to Weber Slough as a part of the Project is the most responsive plan to minimize drainage impacts from the project site and is consistent with the approved Project Description, City conditions of approval, and CEQA mitigation measures for the proposed Project. The stormwater detention basin will provide temporary storage for all runoff generated on the site, minimizing the potential size of the outfall and avoiding significant increases in outflow to Weber Slough. Rock slope protection as an outfall mattress provides protection from scour, while maintaining a semi-natural state using local rock for materials. The outfall is sized for the proposed Sanchez Property development only; therefore, it would not induce unapproved development within the floodplain.

Minimum Floor Elevations for Structures - The proposed building footprint(s) are within the Zone AO (one-foot depth) area. The proposed building finished floor elevation(s) will be elevated by fill to 2 feet above the highest adjacent 100-year Zone

AO water surface elevation per the City of Stockton Municipal Code Section 15.44.150(C)(1). The Stockton Municipal Code is more stringent than both the National Flood Insurance Program (NFIP) and ASCE 24, referenced in the 2019 California Building Code regulations and in this report.

Other Avoidance or Minimization Measures - Proposed widening of Weber Slough would disturb approximately 550 lineal feet of the Weber Slough channel. This work would be subject to State and Federal mitigation requirements imposed as permit conditions by the USACE and Central Valley Flood Protection Board. Work in Weber Slough will be undertaken under dry or low-flow conditions to minimize potential for downstream sedimentation. Standard construction Best Management Practices will be employed to minimize dust, erosion, and potential sedimentation, including compaction of soil, use of water trucks, and re-seeding disturbed areas. Other than the installation of a new box culvert under the proposed Austin Road driveway, and installation of rock slope protection on portions of the bed and banks of a short section of Weber Slough being blanketed by rock slope protection, post-construction conditions along Weber Slough are expected to be comparable to existing conditions.

Potential biological impacts of the project as a whole, including potential effects on special-status species, will be avoided, reduced, or mitigated by Project participation in the San Joaquin County Multi-Species Habitat Conservation Open Space Plan, a federally approved Habitat Conservation Plan that requires fee payments to support habitat conservation and requires projects to undertake specific Incidental Take Minimization Measures to reduce potential impacts on special-status species. All practicable means to avoid, minimize, and mitigate potential adverse impacts on environmental resources were defined in the Project EIR and are incorporated into the Project through the City of Stockton's adopted Mitigation Monitoring and Reporting Program (MMRP).

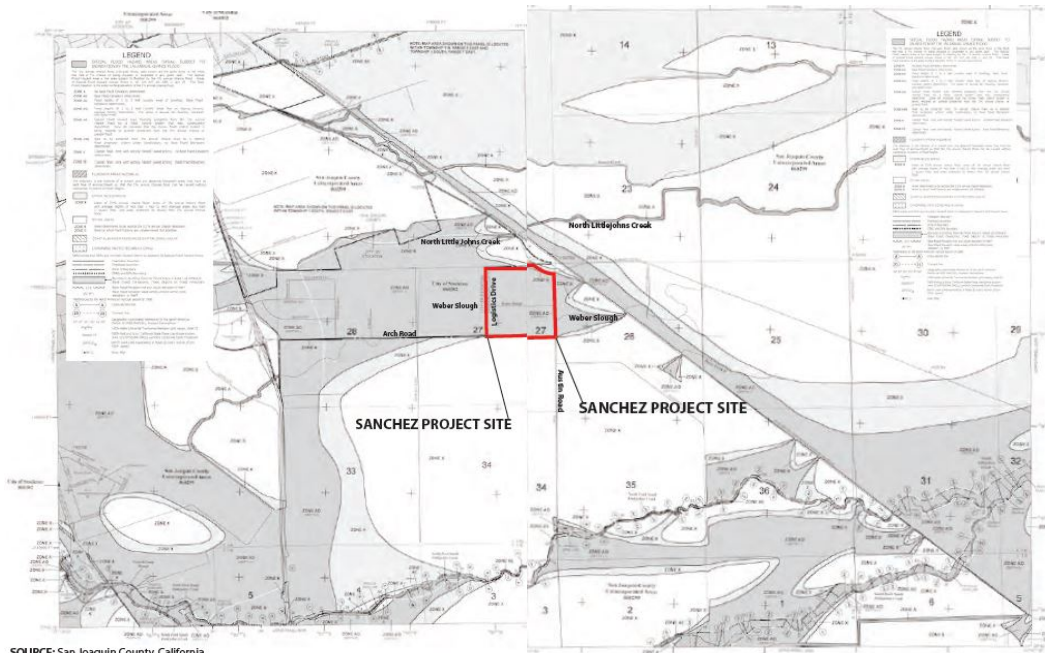
Reconsideration of the No Action Alternative - The No action alternative would avoid project related impacts; however, the No Action alternative fails to meet project objectives and furthermore, the No Action alternative would result in financial losses to the requester and lost opportunities to the region; therefore, the No Action alternative is not practicable.

7. If the final determination is made that no practicable alternative exists to locating the action in the floodplain, advise the general public in the affected area of the findings.

Following completion of the Section 408 review, the E.O. 11988 final determination will be made available to the public on the Sacramento District Public noticing website.

8. Issue findings

USACE has prepared this EO 11988 analysis in support of a Section 408 Permission review of request #19552 submitted by the CVFPB. This analysis was conducted based on information provided by the CVPFB and representatives of ET Stockton Owner LLC. The project site is within an area of southeast Stockton and adjoining unincorporated land that has been in transition from agricultural operations to urban industrial development. The Project will serve the City's projected growth areas in the southeastern portion of the City and complement the surrounding industrial land uses while complying with the policies and programs of the current General Plan, including the need for industrial uses and associated employment. There is no other location in the City or County that would better meet the goals and purposes of the proposed action. The proposed action conforms to the City of Stockton's General Plan which includes provisions to comply with applicable State and local floodplain protection standards. In addition, the proposed action incorporates avoidance and minimization measures to minimize the impacts of floods on human safety, health, and welfare, as well as impacts to the natural and beneficial values of the base floodplain. Based on the analysis above there is no practicable alternative to the proposed action.



SOURCE: San Joaquin County, California
Flood Insurance Rate Map, Panel 490 of 950.

Figure 4A
FLOOD INSURANCE RATE MAP,
PANEL 06077C0490F



Figure 1. FEMA Flood Insurance Rate Map – Approximate Project Area (Excerpts from FIRM Panel 06077C0490F & 06077C0495F.



Figure 2. Proposed alterations overlaid onto the FEMA base floodplain map.

EO 11988 ANALYSIS

Sanchez Industrial Development Weber Slough Drainage Outfall, Channel Widening and Rock Slope Protection Farmington Project Alteration

April 1, 2021

The purpose of this analysis is to comprehensively address criteria required for issuance of a Section 408 Permission from the U.S. Army Corp of Engineers (“USACE”) for the construction of a storm water outfall structure in Weber Slough for the 149-acre Sanchez Industrial Development Project (the “Project”) which was approved by the City of Stockton in 2020 (Figures 1 through 5). The Project is comprised of 149 acres of industrial development on three parcels created at the time the Project was approved (Figure 5). The Project requires an on-site outfall structure and the widening and associated rock slope protection in a 550-foot on-site section of Weber Slough (Figures 7,8,9). The stormwater outfall structure and Weber Slough widening are parts of a stormwater management system that also includes an onsite stormwater detention basin for the 149-acre Project (Figure 7). The stormwater outfall structure and Weber Slough widening are required for completion of Phase 1 (northern section) of this two-phase project and are required before Phase 2 (southern section) can be initiated.

This analysis is organized as follows:

- I. **Project Scope**
 - II. **Purposes of the Proposed Action**
 - III. **Identification of Alternatives**
 - a. **The Proposed Action (Preferred Alternative)**
 - b. **No Action Alternative**
 - c. **Non-Floodplain Alternative**
 - d. **Alternative Action Alternative**
 - IV. **Evaluation of Alternatives**
 - V. **Beneficial and Adverse Impacts**
 - VI. **Avoidance and Minimization Measures**
 - VII. **Conclusion**
- I. **Project Scope**

In compliance with U.S.C. Title 33, Chapter 9, Subchapter 1, Section 408, ET Stockton Owner LLC has requested permission through the Central Valley Flood Protection Board (nonfederal sponsor of the federally authorized project) from the U.S. Army Corps of Engineers (USACE) to alter the Farmington Project, which includes Littlejohn Creek, an existing federal flood risk management project, authorized by the Flood Control Act of 1944. The proposed Project includes installation of a storm drainage outfall and modification of an approximately 600-foot section of Weber Slough, a tributary of Littlejohns Creek. Approved industrial development areas are located adjacent to both sides of Weber Slough) 1.6 miles east of State Route 99, and immediately north of East Arch Road at Logistics Drive, San Joaquin County, California (Figures 1 through 3)

The Project involves development of up to 2.8 million square feet (sf) of industrial buildings, including on-site vehicle circulation, 3,200 parking stalls and utility improvements, in two phases (Figure 5). Phase 1 involves construction of a stormwater detention basin on Parcel 3 and industrial development of Parcel 2. Project approval required Annexation, Pre-Zoning, Vesting Tentative Parcel Map, Site Plan Review and Design Review all of which were approved by the City in 2020. Final annexation approval from the San Joaquin Local Agency Formation Commission (LAFCo) occurred in September 2020. Project approvals were subject to numerous conditions of approval.

II. PROJECT PURPOSES

Project Objectives and Goals

The Project objectives are to implement industrial development of both Phases 1 and 2 of the 149-acre industrial development, including development and installation of an independent stormwater management system meeting the storm drainage needs of both Project phases. The Project objectives include:

Construction of a detention basin at the northwest corner of the property, with other interconnected sub-basins, which would accumulate runoff from the Project site for discharge into Weber Slough.

Construction of an on-site pump station and outfall adjacent to the slough with electronic control of discharges from the basin.

Obtain required permits and approvals for the project, including U. S. Army Corps of Engineers, Section 404 Permit for Storm Drainage Pump Station Discharge and other modifications to Weber Slough.

Expand Norcal Logistics Center east of Logistics Drive, providing land area for further development of industrial warehousing and distribution.

Industrial development of the project site in accordance with the Stockton General Plan 2040 land use designations, objectives, goals and policies.

Industrial development in an area supported by existing development-ready infrastructure, including urban streets, potable water and wastewater systems.

Comply with natural resource management objectives and policies of the Stockton General Plan 2040, by siting new industrial development where impacts to natural resources are minimized.

Comply with the urban planning and design objectives and policies of the Stockton General Plan 2040 and Development Code.

Compliance with Stockton Municipal Code Chapter 15.44 Flood Damage Protection.

Conformance with Conditions of Approval for the Project.

Stormwater Management and Flood Protection Goals

The Project goals include the construction of stormwater management and flood protection improvements that will benefit both the Project and the region. These onsite improvements capture sheet flows from the site in catch basins, from which they are routed through water quality treatment devices and a detention basin before regulated discharge to Weber Slough. Each water quality element utilizes best management practices (BMPs) to protect water quality, which may include filtration, detention of runoff to allow collection of sediments, incorporating sumps into storm drainage basins, and routing of storm drainage flows through activated biomass filters. In order to correct existing flooding resulting from inadequate capacity in Weber Slough as it traverses the site, the Project will widen and thereby increase the capacity of a 550-foot section of the Slough adjacent to Austin Road.

Additionally, the Project proposes to include the provision of stormwater management and flood protection through a network of systems, including stormwater treatment measures, as well as volume reduction measures. The Stormwater is first sent to a Filterra device, which provides treatment of stormwater, prior to discharging the clean stormwater to the onsite detention basin. The detention basin, which is sized at 66 Acre-Feet, and in accordance with City of Stockton standards, provides stormwater management and flood protection. The basin is designed to handle 150% of the 10 year-48 hour storm, at a maximum capacity of 66 acre-feet mark as the pump station aides with discharge. The discharge rate to the Slough was designed to bring the pumping time to 48 hours. Overflow into the pump station occurs once the basin level rises over the 5 acre-feet mark, which is the stormwater quality design volume (SQDV) that the City of Stockton requires be mitigated. The Project stormwater management and flood protection for the site entails providing an outfall structure, which is to be installed at the upper bank of Weber Slough, in addition to the onsite detention basin.

The outfall structure to Weber Slough is a concrete outfall structure, with approximately 2,150 SF area of disturbance. This disturbance includes concrete outfall for two (2) 18" SD force main discharge lines. The outfall discharge is approximately 13 CFS, as mentioned in the project H&H Report. The H&H Report demonstrates that the outfall features do not negatively impact the 100-year water surfaces and flows within Weber Slough. See the Hydraulic Study for final conclusions, as well as benefits to the proposed improvements on the floodplain with regards to Weber Slough.

Implementation of this Project ensures that the stormwater will be detained within the onsite basin and discharged at a rate that is less than the rate of naturally occurring runoff. The post-project flows are equal to or lesser than the pre-project flows when compared directly, as pointed out in the Hydrology Report. One reason attributed to the post project flows being less than or equal to pre-project flows is the widening and protection of the channel near Austin Road, which currently sustains limited local flooding. This widening assists with said local flooding and allows the widening of Austin Road to service the Project. The channel widening is very minor, and results in an increase in channel capacity where the channel geometry changes frequently. This improvement creates a positive impact (protection) from site flooding, channel capacity and

protection. This is mentioned within the Project Hydrology and Hydraulics report prepared by Schaaf & Wheeler, dated September 25, 2020, and referenced throughout this document as the Hydrology Report.

Lastly, the Hydrology Report concludes that the outfall discharge from the basin to facilitate the Site development will not have any adverse impact on the floodplain.

III. Identification of Alternatives

Based on this guidance, the alternatives considered are as follows:

- a. Proposed Action (Preferred Alternative)**
- b. No Action Alternative**
- c. Non-Floodplain Alternative**
- d. Alternative Action Alternative**

a. The Proposed Action (Preferred Alternative)

The Proposed Action is light industrial/warehouse development on the 149-acre Sanchez property. Up to 2.8 million square feet of industrial building space is proposed to be developed, along with circulation, parking, and utility improvements. The project site is within an area of southeast Stockton and adjoining unincorporated land that has been in transition from agricultural operations to urban industrial development. This area has been envisioned in the Stockton General Plan for industrial development since at least 1990 and has developed progressively since that time with industrial, logistical, and institutional uses.

The Project is adjacent to Weber Slough and, as discussed above, would include construction of an on-site pump station and outfall to Weber Slough, which is a mitigation obligation of the project as approved by the City of Stockton in 2020. The outfall structure includes a concrete headwall, wingwalls and apron as well as rock slope protection in the bed and opposite bank of Weber Slough. The Proposed Action also includes widening 550 feet of the on-site portion of the Weber Slough channel, including extending the existing concrete box culvert at the slough crossing of Austin Road, adding two concrete box culverts at a proposed driveway, and providing rock slope protection at both ends of the box culverts and at the end of the improved section to reduce erosion.

b. No Action Alternative

The No Action Alternative would retain the 149-acre Project site in its current condition. The Phase 1 area of the site is, at present, largely developed for industrial use. Under the No Action Alternative, no further industrial development would occur, and the current conditions on the property would remain.

At the time of City approval, the site was in active agricultural use. However, since City approvals, the northern portion of the site, the Phase 1 area, has been extensively modified and is at this time entirely developed but for the completion of tenant improvements. The eastern portion of this area has been mass graded and developed with a large industrial building; all proposed

vehicular circulation and parking has been constructed, and the building and grounds are being prepared for occupancy by the tenant. The detention basin in the western portion of this area has been constructed, and waste soil from this facility has been moved to and piled along the south bank of Weber Slough in the Phase 2 area between Logistics Drive and Austin Road. The developer ET Stockton Owner LLC has spent a total of approximately \$60 million on existing site improvements to date and committed a total of \$97 million required to complete development of the northern area. It can be anticipated that the development of this portion of the site will continue to completion. The Phase 2 southern portion of the site, south of the soil pile excavated from the detention basin, remains in relatively undisturbed condition and could conceivably continue in agricultural use.

Under the No Action Alternative, the southern portion of the proposed project would not be developed and would remain in its existing agricultural/open space use. Under this alternative, construction of the drainage outfall and widening improvements along Weber Slough would not occur. The proposed outfall is an essential improvement for completion of development of the portion of the site north of Weber Slough, which is designed to provide on-site detention of runoff but not to retain runoff long-term. Lack of the outfall may strand existing development north of Weber Slough without adequate storm drainage capacity, potentially resulting in periodic on-site flooding. Existing hydrologic conditions along Weber Slough would remain, including overtopping of its channel, and periodic flooding of this remaining undeveloped portion of the site.

Under the No Action Alternative, the onsite detention basin would not be constructed. This detention basin, servicing the entire project site, also attenuates flows into Weber Slough, and has been shown to provide post project flows that are equal to or less than pre project flows into Weber Slough. The improvements associated from the detention basin, as well as pump station and outfall would not be constructed. Additionally, the widening of the channel near Austin Road would not be constructed, which would continue to contribute to local flooding. See project Hydrology Report for further detail. Under the No Action Alternative, the financial objectives of the City and the community as approved in the Stockton General Plan and Sanchez project approvals would not be realized. There would be no generation of employment opportunities in the industrial, commercial and construction sectors. There would be no increase in the appraised value of the land and no increase in property taxes to assist funding the City's provision of general services, including the services necessary to serve the Project. The financial objectives of the applicant and other industrial users would also not be met. Operation of industrial uses in the northern portion of the site would be complicated by lack of adequate storm drainage capacity. Those anxious to seek permits to construct, occupy and operate industrial uses in the southern portion of the site would be unable to proceed.

c. Non-Floodplain Alternative

The non-floodplain alternative involves the relocation of proposed development out of the designated floodplain. Since the entire Project site is located within a Special Flood Hazard Area, designated Zone A, Zone AE, and Zone AO, there are no on-site non-floodplain areas to which development could be moved.

For an alternative site to be considered practicable, it must be able to accommodate the same level of industrial development as the Sanchez property under the Proposed Action. Therefore, the proposed industrial development of approximately 2.8 million square feet would occur at the alternative site. An alternative site would mean no alteration of current conditions on the Sanchez property, as described under the No Action Alternative. This would mean no site elevation, no installation of drainage facilities, and no improvements within Weber Slough. The existing hydrologic conditions and drainage patterns to Weber Slough would remain, including overtopping of its channel.

No such alternative sites exist. Industrial growth areas in the southern portion of the City, including the Project site, are predominantly located in the floodplain, and no sites suitable to accommodate the Project are located in the City. A City of Stockton study of site availability conducted in conjunction with the annexation of the project site found that industrial parcel availability was extremely limited; the largest such parcel was only 70 acres in size. The project site has been deemed a logical expansion of City limits to the as evidenced by the City and LAFCo approvals. The Project includes the construction of on-site flood control improvements, and properties in the Project vicinity will benefit from the flood control improvements.

The purpose of the Project is to specifically serve the City's projected growth areas in the southeastern portion of the City and to complement the surrounding industrial land uses. The City continues to experience population growth and the associated need for additional housing and employment in planned urbanizing areas. The Project is responsive to the City's development objectives and demands of the known industrial market while complying with the policies and programs of the current General Plan, including the need for industrial uses and associated employment.

Consequently, there are no practicable non-floodplain alternatives for the MDP because it is situated exactly where the growth is planned and necessary on land that is planned, designated and zoned for the proposed land use.

d. Alternative Action Alternative

Construction of a storm water retention basin as an alternative to the proposed detention basin would also mitigate Project impacts to Weber Slough. A retention basin would not require an outfall into the Weber Slough because stored stormwater would be retained on-site and slowly percolate into native soils instead. A retention basin was initially a desirable design option, however geotechnical analysis of the existing soils at the basin site revealed poor soils and infiltration (clayey soils) rates up to a depth of approximately 25 feet below the existing ground surface. To compensate for these reduced infiltration rates, the theoretical retention basin bottom/percolation surface area, and thus the overall project footprint, would need to be significantly larger than the proposed detention basin bottom and top areas to achieve full percolation within the City of Stockton's prescribed 10 day requirement following the design storm. This would also carry a substantial impact on useable site area, building area, and come at a much larger cost.

Another alternative would limit the amount of industrial development that would occur on the Project site. This alternative would involve a reduction in runoff discharged to Weber Slough due to a reduction in impervious surface. Construction of the proposed pump station and outfall. Weber Slough channel improvements.

The identified alternatives are evaluated below as to whether they would provide a practicable alternative to the Proposed Action (40 CFR §230.10(a)). In accordance with Corps guidance, factors to be taken into consideration include, but are not limited to, the following: conservation, economics, aesthetics, natural and beneficial values served by floodplains, impact of floods on human safety, locational advantage, the functional need for locating the development in the floodplain, historic values, fish and wildlife habitat values, endangered and threatened species, Federal and State designations of Wild and Scenic Rivers, refuges, etc., and in general the needs and welfare of the people. The test of practicability will apply to both the Proposed Action and to any induced development likely to be caused by the Proposed Action.

IV. EVALUATION OF THE ALTERNATIVES

The identified alternatives are evaluated herein below for practicability, specifically, whether the property for the alternative is available and the Project would be capable of being constructed at that location when considering cost, existing technology, and logistics, in light of the overall Project purposes (40 C.F.R. § 230.20(a)(2)). Specific criteria include the following: availability, approved Project purpose, logistics, costs, impacts to aquatic ecosystems and other environmental impacts. As evaluated below, the conclusion is that there are no practicable alternatives to the proposed Project

a. The Proposed Action (Preferred Alternative)

The Proposed Action is also the Preferred Alternative. The Project is inextricably linked to the comprehensively planned industrial development of the southeast portion of the City of Stockton. It fulfills the City's long term planning goals and opportunities for the proper growth of the Stockton community, and it has carefully balanced local and regional developmental goals for a proper growth pattern adjacent to existing land uses, while taking into consideration the environmental, social and economic benefits of the Project to the community.

Project (Preferred Alternative) Benefits

The Project will fulfill the following objectives:

Expand Norcal Logistics Center east of Logistics Drive, providing land area for additional development of industrial warehousing and distribution facilities in accordance with the Stockton General Plan 2040 land use designations, objectives, goals and policies.

Industrial development in an area furnished with existing development-ready infrastructure, including urban streets, potable water and wastewater systems.

Comply with natural resource management objectives and policies of the Stockton General Plan 2040, by siting new industrial development where impacts to natural

resources are minimized.

Comply with the urban planning and design objectives and policies of the Stockton General Plan 2040 and Development Code.

Compliance with Stockton Municipal Code Chapter 15.44 Flood Damage Protection.

Conformance with Conditions of Approval for the Project.

Construction of new stormwater management and flood protection improvements, including a detention basin, outfall to Weber Slough and Weber Slough widening that will provide stormwater management and flood protection benefits on the Project site and to the southeast Stockton region.

Project benefits include but are not limited to the following:

Floodplain management. As mentioned within the Hydrology Report, the post-project flows are equal to or less than the pre-project flows. Additionally, with the addition of the project, and by extension, the detention basin, the flow to Weber Slough is attenuated; thus, the time of concentration to Weber Slough is increased to add a more gradual loading, as opposed to the existing conditions.

Community Development. The City of Stockton establishes its objectives for community development in of the Stockton General Plan 2040 adopted in December 2018, which establishes desirable land use patterns for development. The Plan designates the Project site for industrial development, and the Project would fulfill this key objective of the Plan.

The project will help fulfill General Plan Policy LU-4.1:

Encourage large-scale development proposals in appropriate locations that include significant numbers of higher-wage jobs and local revenue generation. Such development may utilize the Economic and Education Enterprise land use designation if the proposal meets all of the criteria listed under the definition of the designation.

The Project will avoid adverse effects on existing and planned residential neighborhoods. The Sanchez site is surrounded by other existing and approved industrial development; there are no residential areas in the vicinity of the site.

Finance, Economy and Employment. The Project would involve the infusion of at least \$97 million into the local economy, as estimated by the project developer, helping realize the City's economic objectives of balanced community development. The project will generate an estimated 2,000 jobs in the industrial and construction sectors, which would result in significant increases in payroll and local spending. The creation of up to 2.8 million sf of industrial space will facilitate local growth in the warehousing and distribution industry, resulting in additional job and revenue growth over time.

The project will result in an increase in the assessed valuation of the land and an increase in property taxes, which would contribute to funding the City's general services, including those services necessary to serve the project site. A portion of payroll increases would translate into sales tax growth, which would also increase local government revenue that will assist in offsetting the cost of governmental services both for the Sanchez property and for needs elsewhere in the City.

A cost/benefit analysis of the project conducted in conjunction with annexation of the project site to the City of Stockton found that the project would generate more than \$5 million in public facilities and connection fees and an additional \$7 million in other development-related fees. The project was estimated to result in direct annual income to the City of approximately \$796,686, which would well exceed estimated annual expenditures of \$540,023, a direct positive contribution to the City budget.

Natural Resources Values. The project involves relatively "clean" industry with no significant adverse environmental air quality impacts as documented in the Project EIR. The project would be aesthetically positive, reflecting City design review standards. The project would not induce development of any other nearby agricultural lands. Development of the project site, which is designated for urban development, would avoid pressure for development of other agricultural lands on the urban fringe.

Conclusion

In conclusion, there are important environmental, land use, economic, technical and logistical factors that support the Project and its objectives of implementing the community development objectives of the Stockton General Plan rendering any alternative impracticable. The Project's benefits outweigh any impacts to the floodplain.

b. No Action Alternative

The No Action Alternative would retain the 149-acre Project site in its current condition. The northern portion of the Project site has been largely developed in accordance with City approvals. Under the No Action Alternative, no further industrial development would occur, no outfall or widening of Weber Slough would occur and the current undeveloped conditions on the southern portion of the property would remain.

Impacts of the No Action Alternative

The No Action Alternative would maintain the status quo on the partially developed Project site. Development activity on the northern portion of the site would likely continue to completion, and agricultural use of the southern portion of the site may continue. Potential impacts to water quality and wind erosion would continue unabated under this alternative. Potential impacts of further development the Project are avoided with the No Project Alternative. With the Project, impacts for most environmental topic areas are either less than significant or can be adequately mitigated. For these areas, the No Action Alternative in many cases presents further reduced levels of impact.

Under the No Action Alternative, construction of the drainage outfall and widening improvements along Weber Slough would not occur. The proposed outfall is an essential improvement for completion of development of the Phase 2 portion of the site north of Weber Slough, which is designed to provide on-site detention of runoff but not to retain runoff long-term. Lack of these facilities would strand existing development north of Weber Slough without adequate storm drainage capacity potentially resulting in periodic on-site flooding. Existing hydrologic conditions along Weber Slough, including periodic overtopping of its channel, flooding of the southern portion of the site would not be corrected, and regional stormwater and flood protection benefits associated with Weber Slough improvements would not be realized.

Under the No Action Alternative, Weber Slough would retain its current conditions, which also includes the local flooding that is outlined within the Hydrology Report, near Austin Road. This means that Austin Road section of Weber Slough will not receive the improvements the project proposes, which benefit the City of Stockton. Additionally, this means that the pre project flows, which are greater than post-project flows, will remain contributory to Weber Slough.

Under the No Action Alternative, the financial objectives of the City and the community as approved in the Stockton General Plan and Sanchez project approvals would not be realized. There would be no further generation of employment opportunities in the industrial, commercial and construction sectors. There would be no further increase in the appraised value of the land and no increase in property taxes to assist funding the City's provision of general services, including the services necessary to serve the Project. The financial objectives of the applicant and other industrial users would only partially be met. Operation of industrial uses in the northern portion of the site would be complicated by lack of adequate storm drainage capacity. Those anxious to seek permits to construct, occupy and operate industrial uses in the Phase 2 southern portion of the site would be unable to proceed.

Nonetheless, as explained below, the benefits of the Project clearly outweigh any of the potential less than significant impacts to resources identified above.

Project Benefits

The Project will fulfill the following objectives:

Expand Norcal Logistics Center east of Logistics Drive, providing land area for additional development of industrial warehousing and distribution facilities in accordance with the Stockton General Plan 2040 land use designations, objectives, goals and policies.

Industrial development in an area furnished with existing development-ready infrastructure, including urban streets, potable water and wastewater systems.

Comply with natural resource management objectives and policies of the Stockton General Plan 2040 by siting new industrial development where impacts to natural resources are minimized.

Comply with the urban planning and design objectives and policies of the Stockton

General Plan 2040 and Development Code.

Compliance with Stockton Municipal Code Chapter 15.44 Flood Damage Protection.

Conformance with Conditions of Approval for the Project.

Construction of new stormwater management and flood protection improvements, which will include Filterra and stormwater treatment devices, also including a detention basin to hold 66 acre-feet of stormwater. The basin includes a pump station, which contains an outfall to Weber Slough, and will attenuate stormwater flows and flood flows into Weber Slough. Additionally, Weber Slough has proposed improvements which include the Pump Station, as well as culvert extension at Austin Road, and channel widening that will better provide stormwater management and flood protection benefits on the Project site and to the southeast Stockton region.

Project benefits include but are not limited to the following:

Floodplain management. As mentioned within the Hydrology Report, the post project flows are equal to or less than the pre-project flows. Additionally, with the addition of the project, and by extension, the detention basin, existing runoff to Weber Slough is attenuated; thus, the time of concentration to Weber Slough is increased to add a more gradual loading, as opposed to the existing conditions.

Community Development. The City of Stockton establishes its objectives for community development in of the Stockton General Plan 2040 adopted in December 2018, which establishes desirable land use patterns for development. The Plan designates the Project site for industrial development, and the Project would fulfill this key objective of the Plan.

The project will help fulfill General Plan Policy LU-4.1:

Encourage large-scale development proposals in appropriate locations that include significant numbers of higher-wage jobs and local revenue generation. Such development may utilize the Economic and Education Enterprise land use designation if the proposal meets all of the criteria listed under the definition of the designation.

The Project will avoid adverse effects on existing and planned residential neighborhoods. The Sanchez site is surrounded by other existing and approved industrial development; there are no residential areas in the vicinity of the site.

Finance, Economy and Employment. The Project would involve the infusion of at least \$97 million into the local economy, as estimated by the project developer, helping realize the City's economic objectives of balanced community development. The project will generate an estimated 2,000 jobs in the industrial and construction sectors, which would result in significant increases in payroll and local spending. The creation of up to 2.8 million sf of industrial space will facilitate local growth in the warehousing and distribution

industry, resulting in additional job and revenue growth over time.

The project will result in an increase in the assessed valuation of the land and an increase in property taxes, which would contribute to funding the City's general services, including those services necessary to serve the project site. A portion of payroll increases would translate into sales tax growth, which would also increase local government revenue that will assist in offsetting the cost of governmental services both for the Sanchez property and for needs elsewhere in the City.

A cost/benefit analysis of the project conducted in conjunction with annexation of the project site to the City of Stockton found that the project would generate more than \$5 million in public facilities and connection fees and an additional \$7 million in other development-related fees. The project was estimated to result in direct annual income to the City of approximately \$796,686, which would well exceed estimated annual expenditures of \$540,023, a direct positive contribution to the City budget.

Natural Resources Values. The project involves relatively "clean" industry with no significant adverse environmental air quality impacts as documented in the Project EIR. The project would be aesthetically positive, reflecting City design review standards. The project would not induce development of any other nearby agricultural lands. Development of the project site, which is designated for urban development, would avoid pressure for development of other agricultural lands on the urban fringe.

Conclusion

In conclusion, there are important environmental, land use, economic, technical and logistical factors that support the Project and its objectives of implementing the community development of the Stockton General Plan rendering the No Action Alternative impracticable. The Project's benefits outweigh any impacts to the floodplain.

c. Non-Floodplain Alternative

The non-floodplain alternative involves the relocation of the proposed industrial development out of the designated floodplain. Since the entire Project site is located within a Special Flood Hazard Area, designated Zone A, Zone AE, and Zone AO, there are no on-site non-floodplain areas to which development could be moved.

The proposed industrial development of approximately 2.8 million square feet would then need to occur at an alternative site. An alternative site would mean no alteration of current conditions on the Sanchez property, as described under the No Action Alternative. This would mean no further development of the northern portion of the site, no development of the southern portion of the site, no installation of drainage facilities, and no improvements within Weber Slough. Relocation of the project would require abandonment of the existing City entitlements and investment to date of more than \$60 million in the approved site. The existing hydrologic conditions and drainage patterns to Weber Slough would remain, including overtopping of its channel.

No such alternative sites exist. Industrial growth areas in the southern portion of the City, including the Project site, are predominantly located in the floodplain, and no sites suitable to accommodate the Project are located in the City. A City of Stockton study of site availability conducted in conjunction with the annexation of the project site found that industrial parcel availability was extremely limited; the largest such parcel was only 70 acres in size. The project site has been deemed a logical expansion of City limits as evidenced by the City and LAFCo approvals. The Project includes the construction of on-site flood control improvements, and properties in the Project vicinity will benefit from the flood control improvements.

The purpose of the Project is to specifically serve the City's projected growth areas in the southeastern portion of the City and to complement the surrounding industrial land uses. The City continues to experience population growth and the associated need for additional housing and employment in planned urbanizing areas. The Project is responsive to the demands of the known market while complying with the policies and programs of the current General Plan, including the need for industrial uses and associated employment.

Consequently, there are no practicable non-floodplain alternatives for the Project because it is situated exactly where the growth is planned and necessary on land that is planned, designated and zoned for the proposed land use.

Impacts of the Non-Floodplain Alternative

If the Project were to be constructed outside the floodplain, impacts in the categories of Land Use, Air Quality, Noise, Water Quality, Biological Resources, Water Supply, Utilities and Service Systems, Aesthetics, Cultural Resources would be the same or similar in a non-floodplain location. Impacts to water resources would be reduced as a non-floodplain location may not require construction of improvements in Waters of the United States or in the floodplain. Impacts such as Traffic and Air Quality could be worsened if the proposed development were moved to a non-floodplain location further away from the City and existing supporting infrastructure.

As a result, the Non-Floodplain Alternative would not have an impact avoidance benefit, since most of the impacts would be the same. Furthermore, as explained below, the benefits of the Project would outweigh any of the Project's impacts to resources as described above and could conceivably result in more intensive impacts in other areas of potential impact.

Alternative sites for the Project may exist but may or may not be available. As discussed above, potential industrial development sites are in very limited supply, and alternative sites may be less desirable than the Project site. Moreover, the project applicant has obtained control of the Project site, has obtained all other necessary approvals specifically for this site. These approvals as well as \$60 million in improvement expenditures to date would be significantly devalued. Existing site improvements may not be completed and may or may not be desirable for other industrial uses.

The Project site is within an area in transition to industrial, logistical, and institutional uses and is surrounded by other industrial and institutional uses. An alternative site may have adjacent land uses, such as residential areas, that would conflict with the proposed industrial development.

Other disadvantages of the Non-Floodplain Alternative are the same as those of the No Action Alternative. The financial objectives of the City and the project applicant would not be realized. There would be no increase in the appraised value of the land and no increase in property taxes to assist funding the City's provision of general services. The financial objectives of the applicant and other industrial users would also not be met. The Sanchez property would not be allowed to develop under its designated use, being inconsistent with the City's General Plan. Overtopping and sheet flooding over the southern portion of the Sanchez site would continue to occur. Existing drainage patterns into Weber Slough would remain, so runoff into Weber Slough would remain unregulated, potentially exacerbating flood conditions downstream. If agriculture use continues on the Sanchez property, potential water quality issues in Weber Slough would persist.

Project Benefits

The Project will fulfill the following objectives:

Expand Norcal Logistics Center east of Logistics Drive, providing land area for additional development of industrial warehousing and distribution facilities in accordance with the Stockton General Plan 2040 land use designations, objectives, goals and policies.

Industrial development in an area furnished with existing development-ready infrastructure, including urban streets, potable water and wastewater systems.

Comply with natural resource management objectives and policies of the Stockton General Plan 2040, by siting new industrial development where impacts to natural resources are minimized.

Comply with the urban planning and design objectives and policies of the Stockton General Plan 2040 and Development Code.

Compliance with Stockton Municipal Code Chapter 15.44 Flood Damage Protection.

Conformance with Conditions of Approval for the Project.

Construction of new stormwater management and flood protection improvements, including a detention basin, outfall to Weber Slough and Weber Slough widening that will provide stormwater management and flood protection benefits on the Project site and to the southeast Stockton region.

Project benefits include but are not limited to the following:

Floodplain management. As mentioned within the Hydrology Report, the post project flows are equal to or less than the pre-project flows. Additionally, with the addition of the project, and by extension, the detention basin, the flow to Weber Slough is attenuated; thus, the time of concentration to Weber Slough is increased to add a more gradual loading, as opposed to the existing conditions.

Community Development. The City of Stockton establishes its objectives for community development in of the Stockton General Plan 2040 adopted in December 2018, which establishes desirable land use patterns for development. The Plan designates the Project site for industrial development, and the Project would fulfill this key objective of the Plan.

The project will help fulfill General Plan Policy LU-4.1:

Encourage large-scale development proposals in appropriate locations that include significant numbers of higher-wage jobs and local revenue generation. Such development may utilize the Economic and Education Enterprise land use designation if the proposal meets all of the criteria listed under the definition of the designation.

The Project will avoid adverse effects on existing and planned residential neighborhoods. The Sanchez site is surrounded by other existing and approved industrial development; there are no residential areas in the vicinity of the site.

Finance, Economy and Employment. The Project would involve the infusion of at least \$97 million into the local economy, as estimated by the project developer, helping realize the City's economic objectives of balanced community development. The project will generate an estimated 2,000 jobs in the industrial and construction sectors, which would result in significant increases in payroll and local spending. The creation of up to 2.8 million sf of industrial space will facilitate local growth in the warehousing and distribution industry, resulting in additional job and revenue growth over time.

The project will result in an increase in the assessed valuation of the land and an increase in property taxes, which would contribute to funding the City's general services, including those services necessary to serve the project site. A portion of payroll increases would translate into sales tax growth, which would also increase local government revenue that will assist in offsetting the cost of governmental services both for the Sanchez property and for needs elsewhere in the City.

A cost/benefit analysis of the project conducted in conjunction with annexation of the project site to the City of Stockton found that the project would generate more than \$5 million in public facilities and connection fees and an additional \$7 million in other development-related fees. The project was estimated to result in direct annual income to the City of approximately \$796,686, which would well exceed estimated annual expenditures of \$540,023, a direct positive contribution to the City budget.

Natural Resources Values. The project involves relatively "clean" industry with no significant adverse environmental air quality impacts as documented in the Project EIR. The project would be aesthetically positive, reflecting City design review standards. The project would not induce development of any other nearby agricultural lands. Development of the project site, which is designated for urban development, would avoid pressure for development of other agricultural lands on the urban fringe.

Conclusion

In conclusion, there are important environmental, land use, economic, technical and logistical factors that support the Project and its objectives of implementing the community development of the Stockton General Plan, thereby rendering the Non-Floodplain Alternative impracticable. The Project's benefits outweigh any impacts to the floodplain.

d. Alternative Action Alternative

A storm water retention basin management alternative would also mitigate impacts to the floodplain and reduce Project flood exposure. A retention basin would not require an outfall into the Weber Slough because stored stormwater would slowly percolate into native soils instead. A retention basin was initially a desirable design option, of the existing soils at the basin site revealed poor soils and infiltration (clayey soils) rates up to a depth of approximately 25 feet below the existing ground surface. To compensate for these reduced infiltration rates, the theoretical retention basin bottom/percolation surface area, and thus the overall project footprint, would need to be significantly larger than the proposed detention basin bottom and top areas to achieve full percolation within the City of Stockton's prescribed 10-day requirement following the design storm. This would also carry a substantial impact on useable site area, building area, and come at a much larger cost.

Engineering evaluation by project engineer Kier and Wright indicated that development of a retention basin on the Project site would not be feasible. This conclusion is consistent with information in the project EIR, which notes that the clay soils underlying the Project site have slow permeability, and thus slow infiltration of runoff into the ground. Reduced development would be partially consistent with the Project objectives but at a reduced level.

Impacts With Alternative Action Alternative

With this alternative, impacts in the categories of Land Use, Air Quality, Noise, Water Quality, Biological Resources, Water Supply, Utilities and Service Systems, Aesthetics, Cultural Resources would be the same or similar as the Project. Impacts to water resources would be reduced as retention of all storm runoff on-site would eliminate the need for construction of improvements in Waters of the United States. Planned improvements to Weber Slough would need to proceed under this alternative to permit development of the southern portion of the site. As a result, the Alternative Action Alternative would have only a minimal impact avoidance benefit, since most of the impacts would be the same. Furthermore, as explained below, the benefits of the Project would outweigh any of the Project's impacts to resources.

Project Benefits

The Project will fulfill the following objectives:

Expand Norcal Logistics Center east of Logistics Drive, providing land area for additional development of industrial warehousing and distribution facilities in accordance with the Stockton General Plan 2040 land use designations, objectives, goals and policies.

Industrial development in an area furnished with existing development-ready infrastructure, including urban streets, potable water and wastewater systems.

Comply with natural resource management objectives and policies of the Stockton General Plan 2040, by siting new industrial development where impacts to natural resources are minimized.

Comply with the urban planning and design objectives and policies of the Stockton General Plan 2040 and Development Code.

Compliance with Stockton Municipal Code Chapter 15.44 Flood Damage Protection.

Conformance with Conditions of Approval for the Project.

Construction of new stormwater management and flood protection improvements, including a detention basin, outfall to Weber Slough and Weber Slough widening that will provide stormwater management and flood protection benefits on the Project site and to the southeast Stockton region.

Project benefits include but are not limited to the following:

Floodplain management. As mentioned within the Hydrology Report, the post-project flows are equal to or less than the pre-project flows. Additionally, with the addition of the project, and by extension, the detention basin, the flow to Weber Slough is attenuated, thus, the time of concentration to Weber Slough is increased to add a more gradual loading, as opposed to the existing conditions. Community Development. The City of Stockton establishes its objectives for community development in of the Stockton General Plan 2040 adopted in December 2018, which establishes desirable land use patterns for development. The Plan designates the Project site for industrial development, and the Project would fulfill this key objective of the Plan.

The project will help fulfill General Plan Policy LU-4.1:

Encourage large-scale development proposals in appropriate locations that include significant numbers of higher-wage jobs and local revenue generation. Such development may utilize the Economic and Education Enterprise land use designation if the proposal meets all of the criteria listed under the definition of the designation.

The Project will avoid adverse effects on existing and planned residential neighborhoods. The Sanchez site is surrounded by other existing and approved industrial development; there are no residential areas in the vicinity of the site.

Finance, Economy and Employment. The Project would involve the infusion of at least \$97 million into the local economy, as estimated by the project developer, helping realize the City's economic objectives of balanced community development. The project will

generate an estimated 2,000 jobs in the industrial and construction sectors, which would result in significant increases in payroll and local spending. The creation of up to 2.8 million sf of industrial space will facilitate local growth in the warehousing and distribution industry, resulting in additional job and revenue growth over time.

The project will result in an increase in the assessed valuation of the land and an increase in property taxes, which would contribute to funding the City's general services, including those services necessary to serve the project site. A portion of payroll increases would translate into sales tax growth, which would also increase local government revenue that will assist in offsetting the cost of governmental services both for the Sanchez property and for needs elsewhere in the City.

A cost/benefit analysis of the project conducted in conjunction with annexation of the project site to the City of Stockton found that the project would generate more than \$5 million in public facilities and connection fees and an additional \$7 million in other development-related fees. The project was estimated to result in direct annual income to the City of approximately \$796,686, which would well exceed estimated annual expenditures of \$540,023, a direct positive contribution to the City budget.

Natural Resources Values. The project involves relatively "clean" industry with no significant adverse environmental air quality impacts as documented in the Project EIR. The project would be aesthetically positive, reflecting City design review standards. The project would not induce development of any other nearby agricultural lands. Development of the project site, which is designated for urban development, would avoid pressure for development of other agricultural lands on the urban fringe.

Conclusion

In conclusion, there are important environmental, land use, economic, technical and logistical factors that support the Project and its objectives of implementing the community development of the Stockton General Plan, thereby rendering the Alternative Action Alternative impracticable. The Project's benefits outweigh any impacts to the floodplain.

V. BENEFICIAL AND ADVERSE IMPACTS OF THE PROPOSED ACTION

The Project Supports Natural and Beneficial Flood Plain Values

The project will not result in a loss of any natural or beneficial flood plain values. With respect to stormwater management, the Project reduces the post-project peak discharge rate into the Weber Slough relative to the pre-project discharge rate by approximately 13 cfs. The Project at the same time will accommodate runoff from storm intensities up to 150% of the 10 year / 48 hour storm event, and stormwater will be treated in accordance with the City of Stockton's Municipal Separate Storm Sewer System (MS4) Post-Construction requirements documented in the City's Storm Water Quality Control Criteria Plan (SWQCCP), as described below. The proposed detention basin also provides compensatory floodplain volume storage to offset floodplain storage eliminated by placing fill at structure locations to elevate finish floors above the Base

Flood Elevations.

The project will not result in a loss of any natural or beneficial flood plain values. With respect to stormwater management, the Project reduces the post-project peak discharge rate into the Weber Slough relative to the pre-project discharge rate by approximately 13 cfs. The Project at the same time will accommodate runoff from storm intensities up to 150% of the 10 year / 48 hour storm event, and stormwater will be treated in accordance with the City of Stockton's Municipal Separate Storm Sewer System (MS4) Post-Construction requirements documented in the City's Storm Water Quality Control Criteria Plan (SWQCCP), as described below. The proposed detention basin also provides attenuation of the stormwater and floodwater volume by providing a storage volume within the onsite detention basin. Additionally, the finish floors have been elevated above Base Flood Elevations in the area, should there ever be an issue. The project Hydrology Report indicates there should be no impact to Weber Slough with the proposed improvements, when compared to the existing pre project conditions. The Project also improves the hydraulic capacity of Weber Slough downstream of the project during peak flows by detaining runoff from the 149-acre site during major storm events until the peak flow (and resulting flood levels) have receded. This is achieved by restricting pumping from the detention basin when water surface elevations in Weber Slough reach a set level that is well below peak flood levels. These pumping parameters and water surface levels have been set by the Flood Management Division of San Joaquin County Public Works.

Land Use and Community Development

The project will result in the conversion of 149 acres of agricultural land to industrial uses. Industrial development of the project site has, however, been established as the most desirable use for the site in the Stockton General Plan 2040 land use designations. Conversion of agricultural lands was specifically accepted by the City in its Statement of Overriding Considerations adopted with the General Plan. The acceptability of agricultural land conversion on the site was again accepted by the City in its approval of the Project, and again by the Local Agency Formation Commission in its approval of Project annexation to the City. The Project is responsible for payment of the City's Agricultural Land Conversion Mitigation Fee, which is accepted as the best available mitigation measure for agricultural land conversion impacts.

The Project will not result in any land use incompatibilities. All existing and planned surrounding land uses are industrial in character, and there are no residential or retail commercial areas adjacent to or in the vicinity of the Project. No land use incompatibilities or community impacts were identified in the City's EIR for the Project.

Finance, Economy and Employment

The Proposed Action would involve the infusion of at least \$97 million into the local economy, as estimated by the project developer. This would help realize the City's economic objectives of community development. Development of the Sanchez property will generate substantial new employment opportunities in the industrial and construction sectors. The project applicant estimated that, when fully constructed, project operations would result in the generation of more than 2,000 jobs, along with the increases in payroll and local spending that would

accompany those jobs. The creation of approximately 2.8 million sf of industrial space will facilitate local growth in the warehousing and distribution industry, resulting in additional job and revenue growth over time.

The project will result in an increase in the assessed valuation of the land and an increase in property taxes, which would contribute to funding the City's general services, including those services necessary to serve the project site. A portion of payroll increases would translate into sales tax growth, which would also increase local government revenue that will assist in offsetting the cost of governmental services both for the Sanchez property and for needs elsewhere in the City.

A cost/benefit analysis of the project conducted in conjunction with annexation of the project site to the City of Stockton found that the project would generate more than \$5 million in public facilities and connection fees and an additional \$7 million in other development-related fees. The project was estimated to result in direct annual income to the City of approximately \$796,686, which would well exceed estimated annual expenditures of \$540,023, a direct positive contribution to the City budget.

Natural Resources Values

The potential environmental impacts of the project were detailed in the Sanchez-Hoggan Annexation EIR prepared by the City and certified in 2020. Among the many subjects addressed in the EIR, the majority of the potential environmental impacts described were found to be less than significant, either by themselves or as a result of application of mitigation measures described in the EIR. All EIR mitigation measures were incorporated into the project as a part of the conditions of approval for the project adopted by the City.

The potential effects of the project on natural resources values, such as air, water, biological resources and land would be regarded as modestly negative, but all of these impacts, with the exception of motor vehicle traffic impacts, have been reduced to a less than significant level with mitigation measures. One important mitigation involves Project participation – that is, payment of HCP fees and implementation of Incidental Take Minimization Measures (ITMMs) - in the San Joaquin County Multi-Species Open Space and Habitat Conservation Plan (SJMSCP) will, through investment of fee payments and implementation of ITMMs Measures, avoid significant biological effects and result in net benefits to biological resources in the County as a whole.

The Project Enhances Regional Flood Protection

The onsite detention basin and the pump station and outfall to Weber Slough will enhance regional flood protection in addition to addressing stormwater management of the 149-acre site. The Project additionally improves the hydraulic capacity of Weber Slough, particularly near Austin Road, to prevent flooding near the public right of way. The project site will also detain runoff from the 149-acre site during a major storm event until the peak flow (and resulting flood levels) have receded. This helps the basin serve as an attenuation basin to lessen the impact to Weber Slough and allows pumping to allow a more constant loading of the Slough. These pumping parameters and water surface levels have been designed in conjunction with San

Joaquin County Flood Management Division.

The detention basin has been designed to have a capacity that complies with the City of Stockton, the requirement being 150% of a 10 Year / 48 Hour Storm. This volume is contained within a 66 acre-foot basin servicing the 149 acre project. This volume also helps to mitigate and exceed the flood water that would naturally occur onsite, by attenuating its flow into Weber Slough. The Site, which is located within Special Flood Hazard Area (SFHA) Zone AO (1' Depth) shown in the effective Flood Insurance Maps (FIRMs) Panel Numbers 06077C0490F and 06077C0495F, effective date October 16, 2009 (Figure 4). Per the project Hydrology Report, the design capacity of the detention basin, and construction pump station for stormwater outfall to Weber Slough has been found to not have any adverse impact to the floodplain.

As the City of Stockton carries a requirement for any proposed structure constructed within a 100-year floodplain to carry a finished floor elevation that at least 2-feet above the 100-year base flood elevation, the volume of material to be removed from the stormwater detention basin will vastly exceed the volume of floodwater that would be displaced by the structure(s). The stormwater detention basin will provide greater floodwater storage capacity than currently exists at the Project Site.

The stormwater detention basin and outfall structure are both mitigation measures, and conditions of approval, and have been fully analyzed in the underlying Sanchez Development Project environmental documentation pursuant to the California Environmental Quality Act ("CEQA"). The Environmental Impact Report prepared pursuant to CEQA has concluded that there are no significant environmental impacts as a result of these actions.

With regards to disturbance within Weber Slough, the concrete outfall will require excavation of native soils within Weber Slough. This would allow the concrete outfall structure to be installed, as well as provide erosion protection at the outfall. The concrete outfall will be placed flush with native soils such that no losses to channel capacity are encountered in Weber Slough. Additionally, the outfall discharge would conform to the channel slope, such that there is not an obstruction to the channel capacity. At such time that high flows occur within French Camp Slough, Weber Slough acts as a lateral storage area to French Camp Slough. As the Project improves Weber Slough capacity, and attenuates the flow entering Weber Slough, the change is a net positive for the flood plain. Therefore, there are no adverse impacts resulting from the proposed project. An important beneficial impact of the outfall and the 149 acre Project development, is the enhancement of regional flood protection. Beneficial impacts include attenuating flood flows into Weber Slough, maintaining water storage capacity onsite through detention basin, while keeping flows to the channel at or below the pre-project condition.

In conclusion, the proposed project has no adverse effect on upstream facilities such as Farmington Reservoir. There are no Farmington facilities on or near the Sanchez site. The project would reduce existing contribution from the project site to downstream peak flows on Weber Slough.

Water Quality

Project implementation could result in the potential degradation of water quality during project construction and operation. During construction, disturbance of soil and operation of construction equipment can lead to increased sediments and vehicle fluids in stormwater or surface runoff. Under the City's Storm Water Management Plan, construction activities require the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which requires the incorporation of erosion and sediment control measures into construction plans.

After construction, site runoff could contain heavy metals and hydrocarbons from vehicle fluid as well as chemicals used in landscape maintenance with possible impacts on water. The City of Stockton has developed a Storm Water Quality Control Criteria Plan (SWQCCP) that is intended to establish uniform requirements for the selection and incorporation of storm water quality into the planning, design, construction and maintenance of flood management projects and new development in a manner consistent with the Federal Clean Water Act (CWA) and the City's Storm Water Management Plan. Pursuant to these requirements, the Project will capture runoff in drain inlets, route it through runoff treatment devices and discharge it to the proposed detention basins. Filterra engineered biofiltration features will capture and break down urban runoff pollutants with energy dissipators, liners, activated biomass and underdrains.

Implementation of the SWQCCP components will ensure that any impacts to water quality will be mitigated to a level of insignificance. The Project applicant will comply with the applicable water quality and storm drainage discharge requirements consistent with any waste discharge or water quality certification requirements authorized by the SWQCCP. A Water Quality Certification may also be required. Implementation of the above mitigation measures will reduce potential water degradation impacts to a less than significant level.

Impact that Remain Significant After Mitigation

The Sanchez-Hoggan Annexation EIR indicates that the proposed project would involve only one potentially significant and unavoidable effect, which is a variation on Impact TRANS-2: Motor Vehicle Transportation Plans – Intersections. All available mitigation measures were applied to this effect, but the potential traffic impact was left to be unavoidable. This analysis was, however, based solely on Level of Service, a now inapplicable standard when used for analyzing significant impacts to the environment. This is, in any event, a potential effect on urban infrastructure rather than natural resource values. The effect was accepted by the City Council in its CEQA Findings adopted in conjunction with its June 2020 approval of the Project. As described in the EIR, the project would not result in any significant adverse impacts on hydrologic resources.

VI. AVOIDANCE AND MINIMIZATION MEASURES

Construction of the Detention Basin and Outfall

The construction of the storm water detention basin and outfall to Weber Slough as a part of the Project is the most responsive plan to minimize drainage impacts from the project site and is

consistent with the approved Project Description, City conditions of approval and CEQA mitigation measures for the proposed Project. The stormwater detention basin will provide temporary storage for all runoff generated on the site, minimizing the potential size of the outfall and avoiding significant increases in outflow to Weber Slough. Rock slope protection as an outfall mattress provides protection from scour, while maintaining a semi-natural state using local rock for materials. The outfall is sized for the proposed Sanchez development only; therefore, it would not induce unapproved development within the floodplain.

Consideration of Onsite Capture of Runoff (percolation found to be infeasible)

A storm water retention basin management alternative to the Proposed Action would mitigate impacts to the floodplain within the project site. A retention basin would not require an outfall into the Weber Slough, because stored stormwater would slowly percolate into native soils instead. However, an evaluation by Kier and Wright, Project engineer indicated that a retention basin would not be feasible. This conclusion is consistent with information in the Sanchez-Hoggan Annexation EIR, which notes that the clay soils underlying the Sanchez property have slow permeability, and thus slow infiltration of runoff into the ground. To compensate for the poor infiltration rates, the retention basin bottom surface area and overall footprint would need to be significantly larger than the proposed detention basin to achieve full dewatering within the City of Stockton's prescribed 48-hour requirement following the design storm. The project site is not of sufficient size to accommodate the project and a retention basin. Additional land area and more development in the floodplain, or a reduction in the project size, would be required to incorporate the retention basin concept.

Minimum Floor Elevations for Structures

The proposed building footprint(s) are within the Zone AO (one-foot depth) area. The proposed building finished floor elevation(s) will be elevated by fill to 2 feet above the highest adjacent 100-year Zone AO water surface elevation per the City of Stockton Municipal Code Section 15.44.150(C)(1). The Stockton Municipal Code is more stringent than both the National Flood Insurance Program (NFIP) and ASCE 24, referenced in the 2019 California Building Code regulations and in this report.

Other Avoidance or Minimization Measures

The project will not result in significant adverse impacts to biological resources. Proposed widening of Weber Slough would result disturb approximately 550 lineal feet of the Weber Slough channel. This work would be subject to State and Federal mitigation requirements imposed as permit conditions by the USACE and Central Valley Flood Protection Board. Work in Weber Slough will be undertaken under dry or low-flow conditions to minimize potential for downstream sedimentation. Standard construction Best Management Practices will be employed to minimize dust, erosion, and potential sedimentation, including compaction of soil, use of water trucks, and re-seeding disturbed areas. Other than the installation of a new box culvert under the proposed Austin Road driveway and installation of rock slope protection on portions of the bed and banks of a short section of Weber Slough being blanketed by rock slope protection, post-construction conditions along Weber Slough are expected to be comparable to existing

conditions. With permit-imposed mitigation measures, potential impacts along the disturbed portions of the Slough would be less than significant.

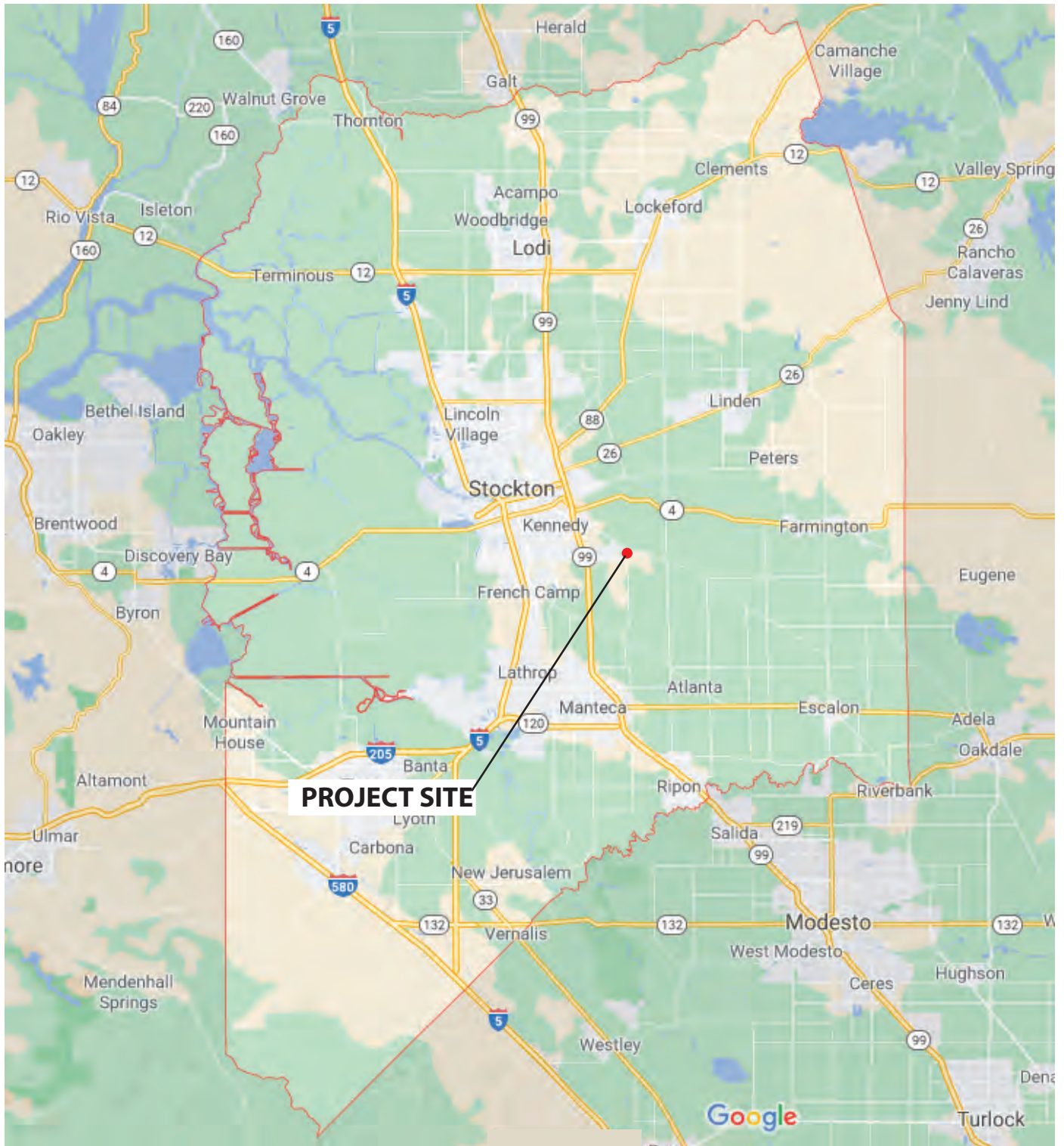
Potential biological impacts of the project as a whole, including potential effects on special-status species, will be avoided or reduced to a less than significant level by Project participation in the SJMSCP, a federally approved Habitat Conservation Plan that requires fee payments to support habitat conservation and requires projects to undertake specific Incidental Take Minimization Measures to reduce potential impacts on special-status species.

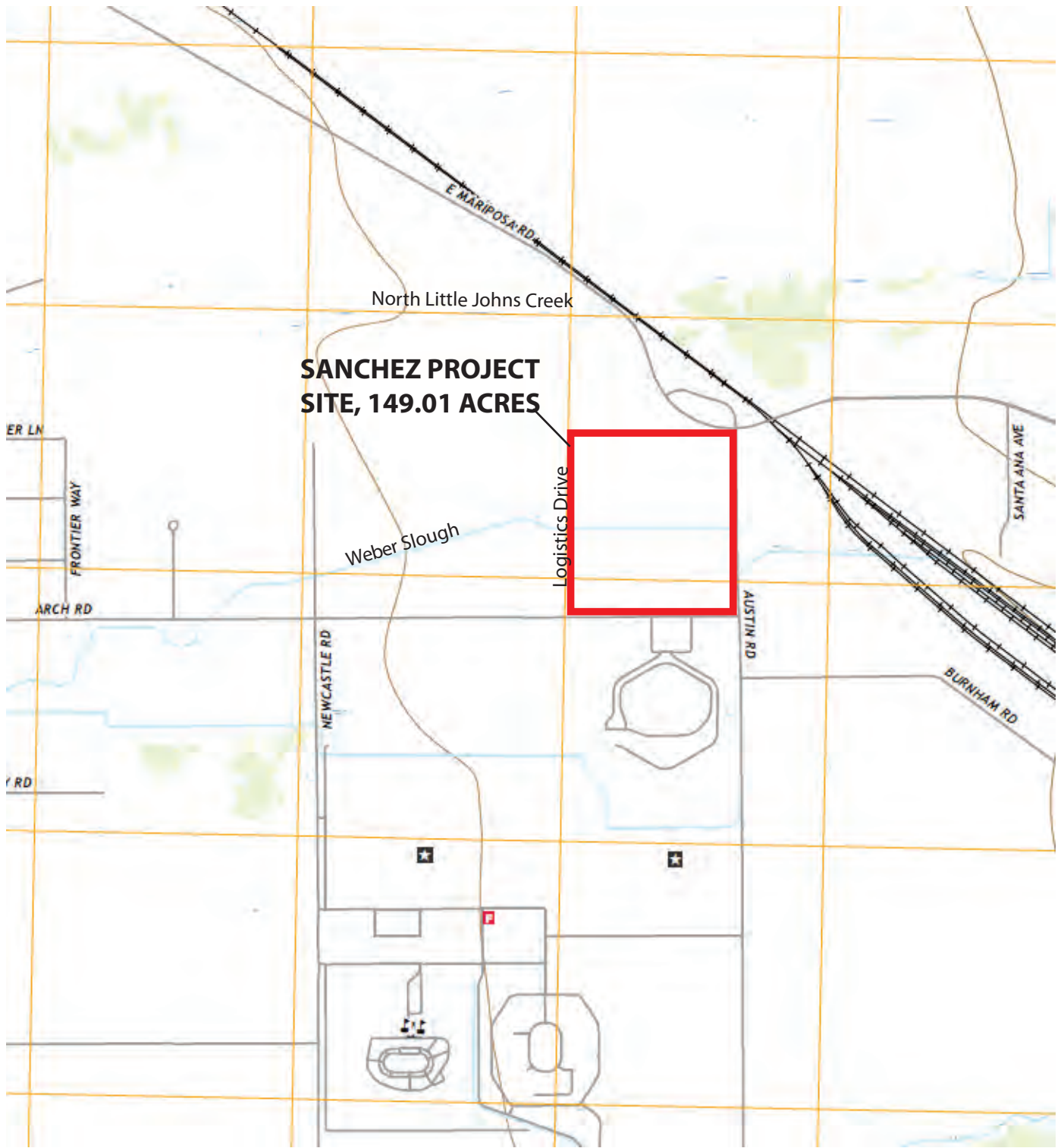
All practicable means to avoid, minimize, and mitigate potential adverse impacts on environmental resources were defined in the Project EIR and are incorporated into the Project through the City of Stockton's adopted Mitigation Monitoring and Reporting Program (MMRP). The MMRP details the EIR mitigation measures and how they are to be implemented by the project applicant and successors-in-interest. Therefore, beside the traffic impact discussed above the project would not involve unavoidable significant effects on environmental resources, and no additional mitigation is required.

VII. Conclusion

The proposed Project does not impair the usefulness of the existing Farmington Project and it is not injurious to the public interest. Weber Slough is hydraulically disconnected from and has no part in the functioning of the Farmington Project (Figure 11). There are few significant environmental impacts from the proposed Project, and these are reduced to a less than significant level with mitigation measures. Therefore, the benefits of the proposed Project - to provide approved industrial uses and increased flood protection for the proposed Project site and the region - outweigh any of those identified impacts.

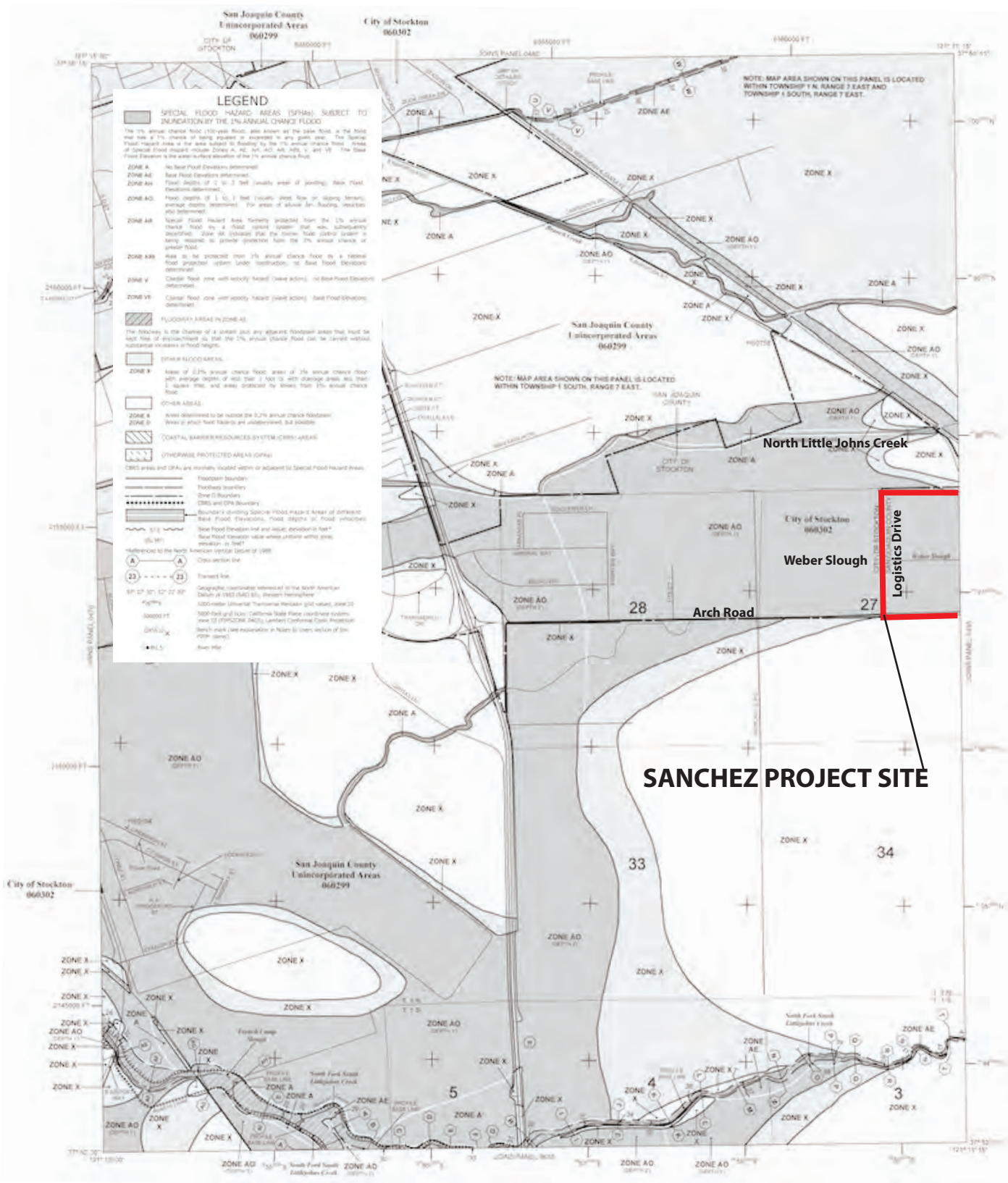
FIGURES





**SANCHEZ PROJECT
SITE, 149.01 ACRES**

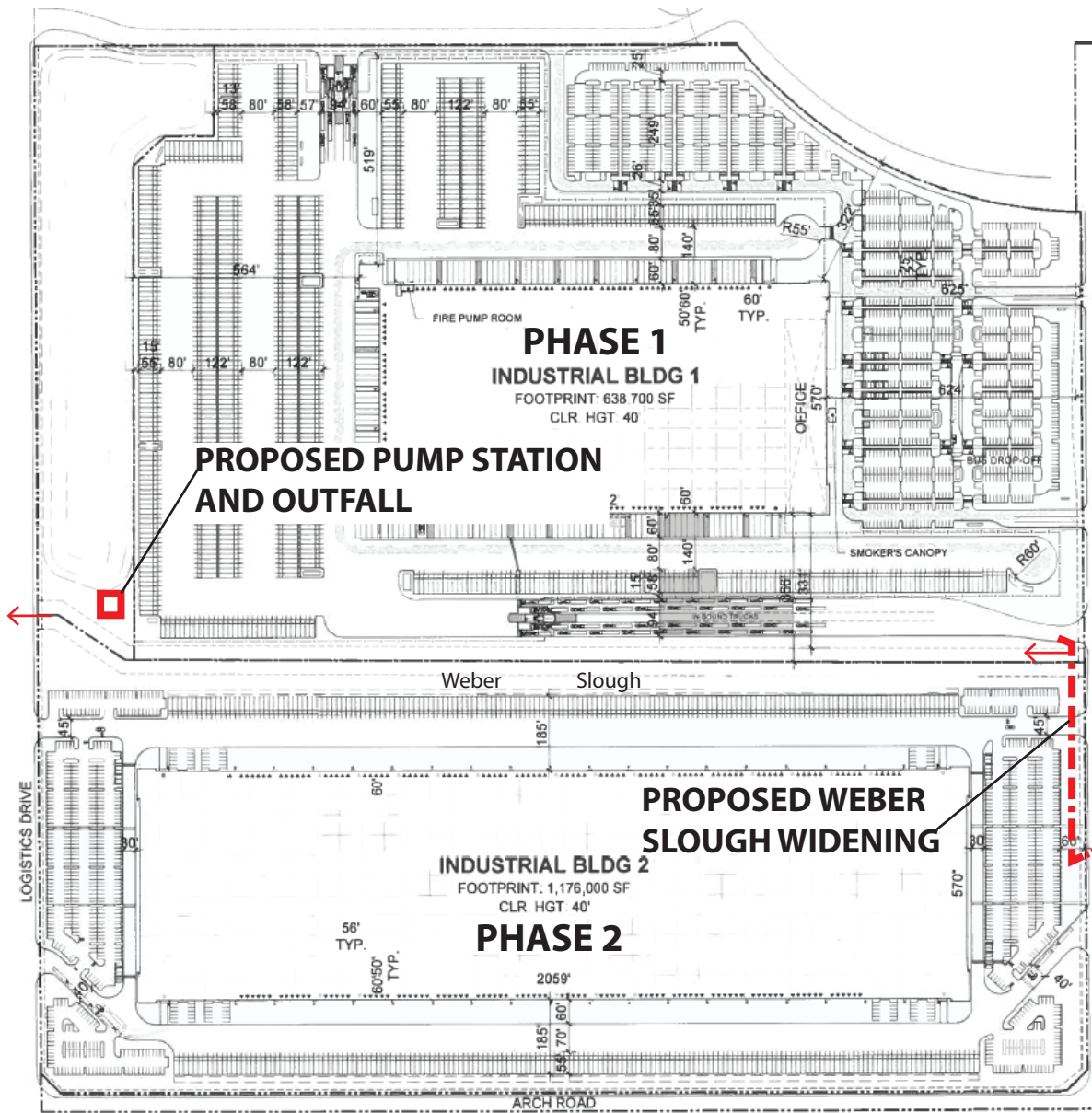




SOURCE: San Joaquin County, California
Flood Insurance Rate Map, Panel 490 of 950.

Figure 4A
FLOOD INSURANCE RATE MAP,
PANEL 06077C0490F





PROJECT DATA:	
SITE 1 AREA:	
GROSS:	76.39 AC
	3,327,466 SF
BUILDING 1:	
	638,700 SF
BUILDING USE:	
WAREHOUSE	594,700 SF
OFFICE @ 10%	44,000 SF
COVERAGE:	
GROSS:	19%
PARKING REQUIRED:	
WAREHOUSE	
1ST 50KSF	1/2000 SF 25 STALLS
OVER 50KSF	1/4000 SF 136 STALLS
OFFICE	1/250 SF 176 STALLS
TOTAL	337 STALLS
PARKING PROVIDED:	
AUTO:	1,168 STALLS
	@ 1.83/1000 SF
REQ. ACCESSIBLE	23 STALLS
TRAILER:	783 STALLS
TRUCK DOCKS:	
▲ DOCK-HIGH DOORS	132
○ GRADE-LEVEL DOORS	4
SITE 2 AREA:	
GROSS:	64.41 AC
	2,805,599 SF
BUILDING 2:	
	1,176,000 SF
BUILDING USE:	
WAREHOUSE	1,058,400 SF
OFFICE @ 10%	117,600 SF
COVERAGE:	
GROSS:	42%
NET:	42%
PARKING REQUIRED:	
WAREHOUSE	
1ST 50KSF	1/2000 SF 25 STALLS
OVER 50KSF	1/4000 SF 252 STALLS
OFFICE	1/250 SF 470 STALLS
TOTAL	748 STALLS
PARKING PROVIDED:	
AUTO:	961 STALLS
	@ 0.82/1000 SF
REQ. ACCESSIBLE	19 STALLS
TRAILER:	331 STALLS
TRUCK DOCKS:	
▲ DOCK-HIGH DOORS	166
▲ KNOCK-OUTS OR RATED	33
○ GRADE-LEVEL DOORS	4
SITE 3 AREA:	
GROSS:	9.27 AC
	403,885 SF
DETENTION:	
@ 84%	339,445 SF
NET:	64.41 AC
	2,805,599 SF

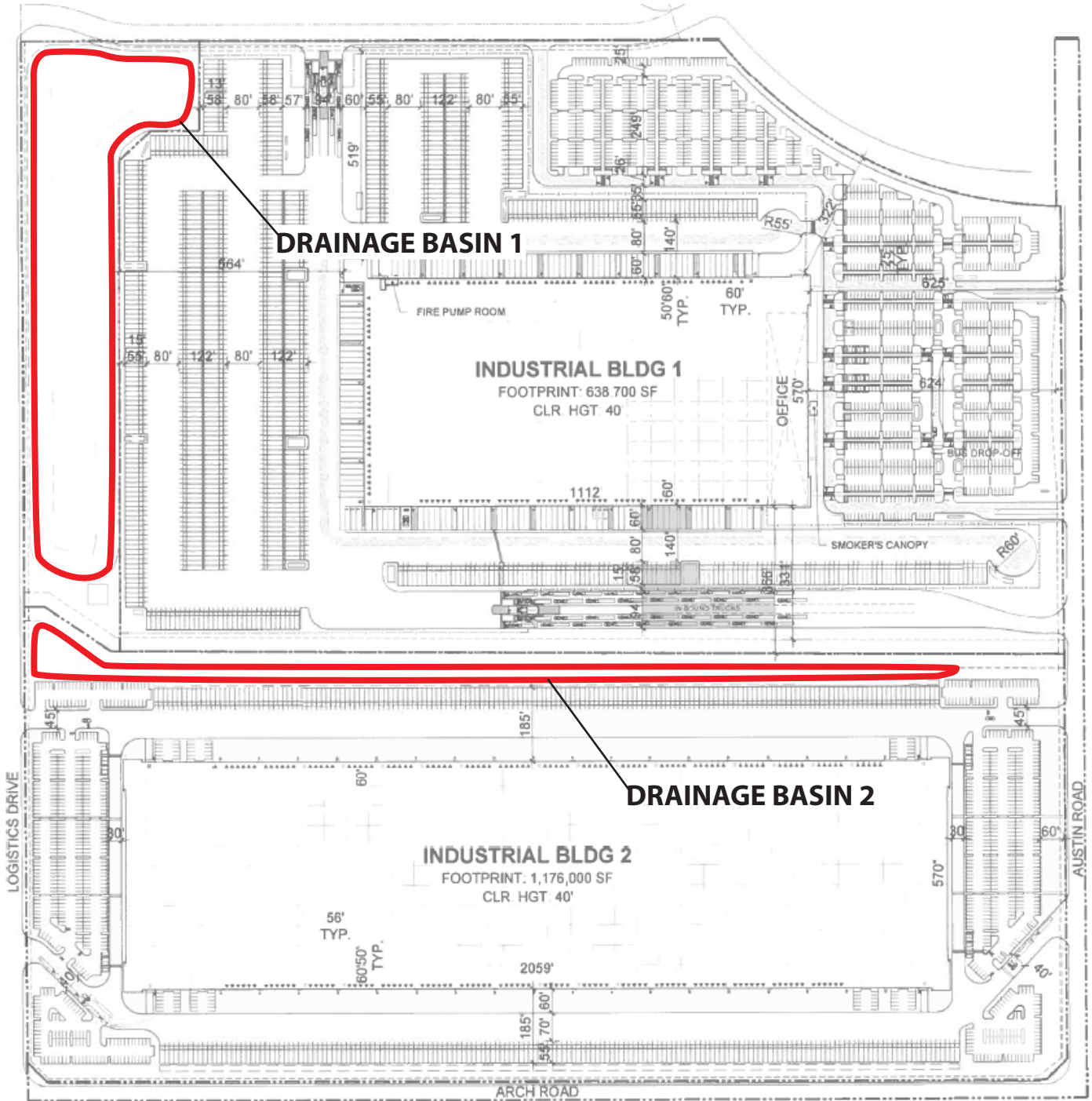
DEVELOPMENT STANDARDS:	
ZONING:	
	IL
MAX. F.A.R.:	
	0.60
MAX. COVERAGE:	
	NA
BUILDING SETBACKS:	
FRONT:	NA
SIDE:	NA
REAR:	NA
LANDSCAPE SETBACKS:	
FRONT:	10 FT
SIDE:	NA
REAR:	NA
LANDSCAPE REQ.:	
	5%
OFF-STREET PARKING:	
STANDARD:	9x19
COMPACT:	9x15
COMPACT %:	25%
DRIVE AISLE:	25 FT
FIRE LANE:	20 FT
OVERHANG:	2 FT
TREE WELL:	6 FT
REQ. PARKING RATIO BY USE:	
WAREHOUSE:	
0 - 500,000 SF	1/2000 SF
>500,000 SF	1/4000 SF
OFFICE:	1/250 SF

NOTES:

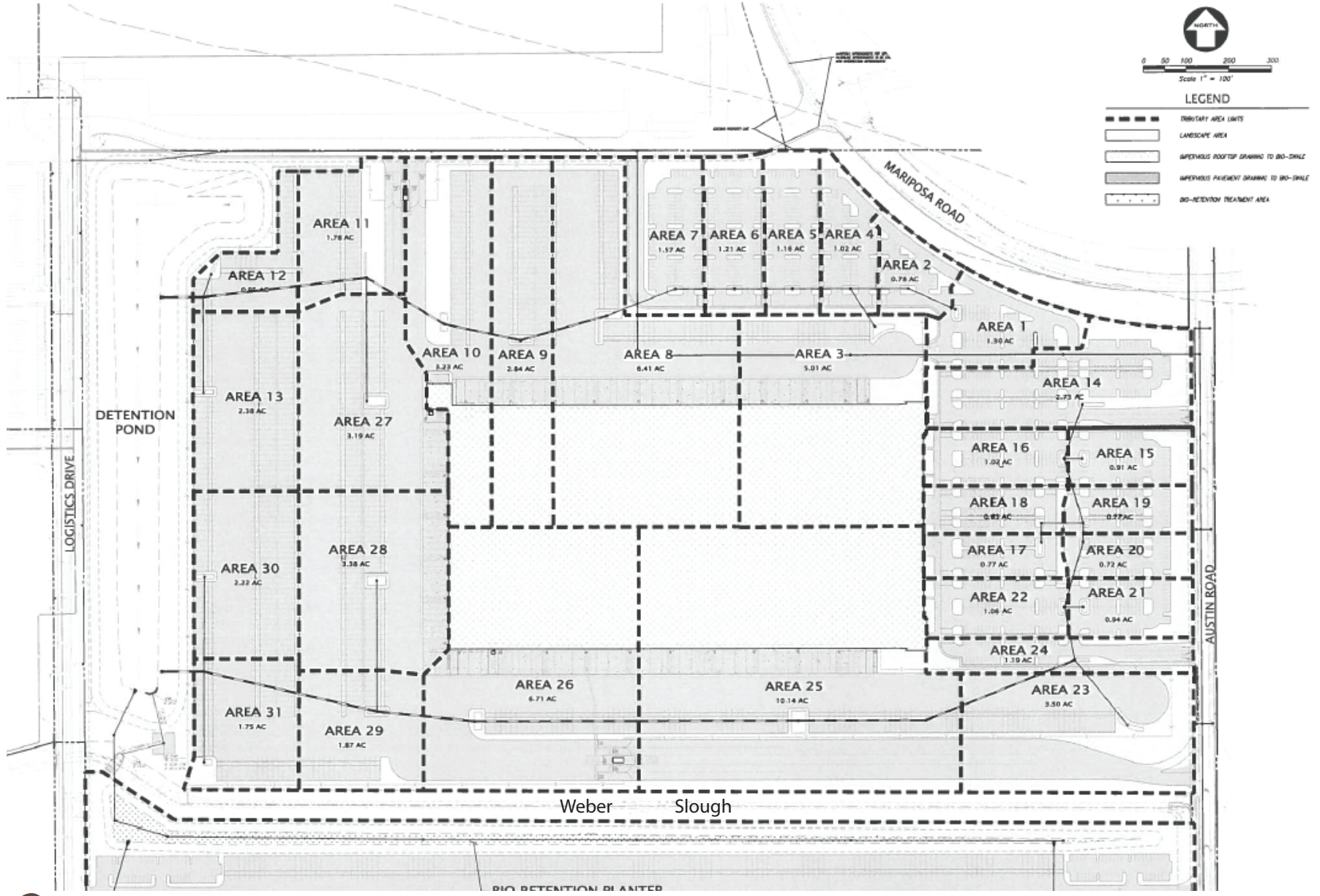
SOURCE: Ware Malcomb

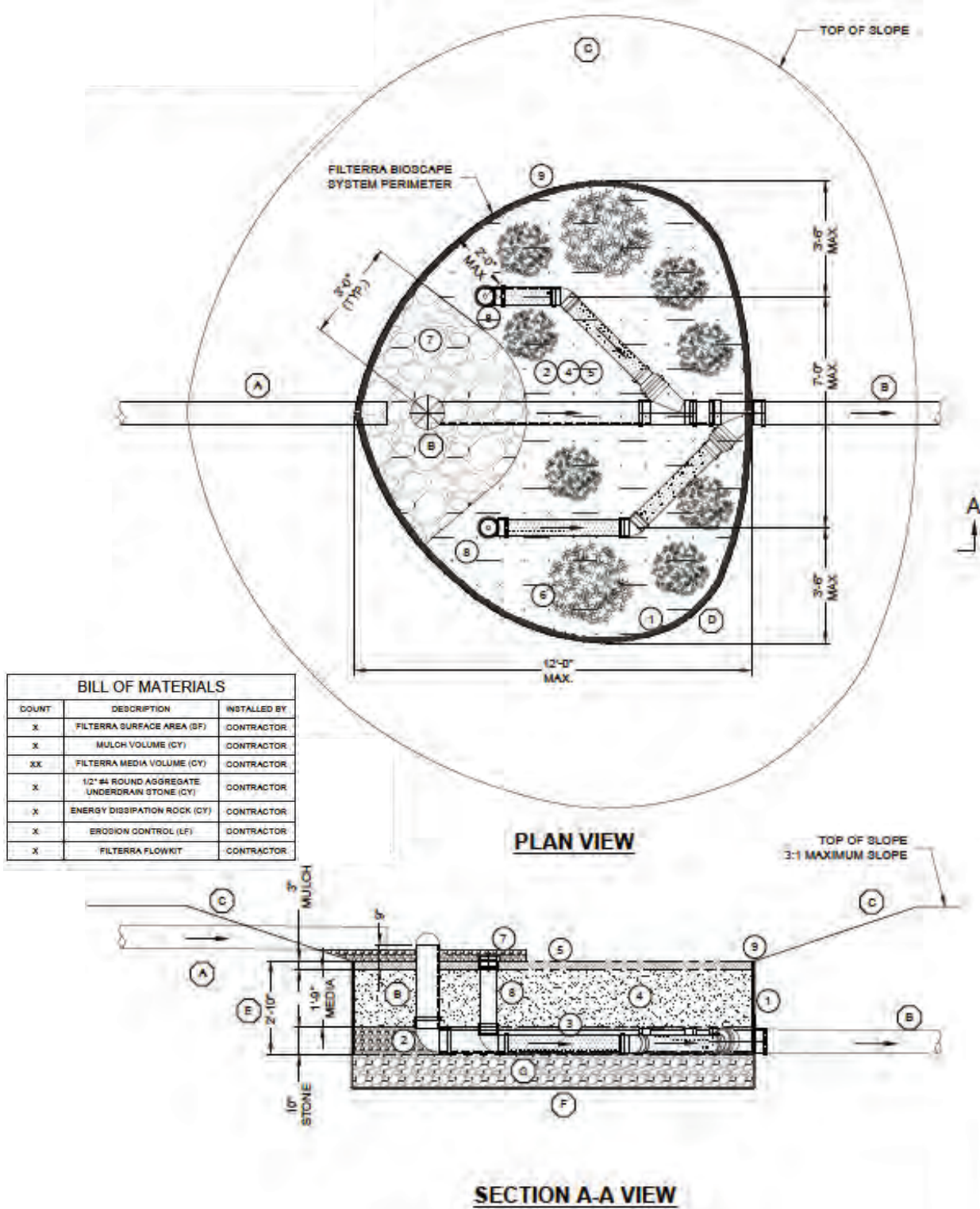


SOURCE: Ware Malcomb



SOURCE: Ware Malcomb





SOURCE: Contech Engineered Solutions LLC.



Figure 10
FILTERRA BIOSCAPE SYSTEM DETAIL

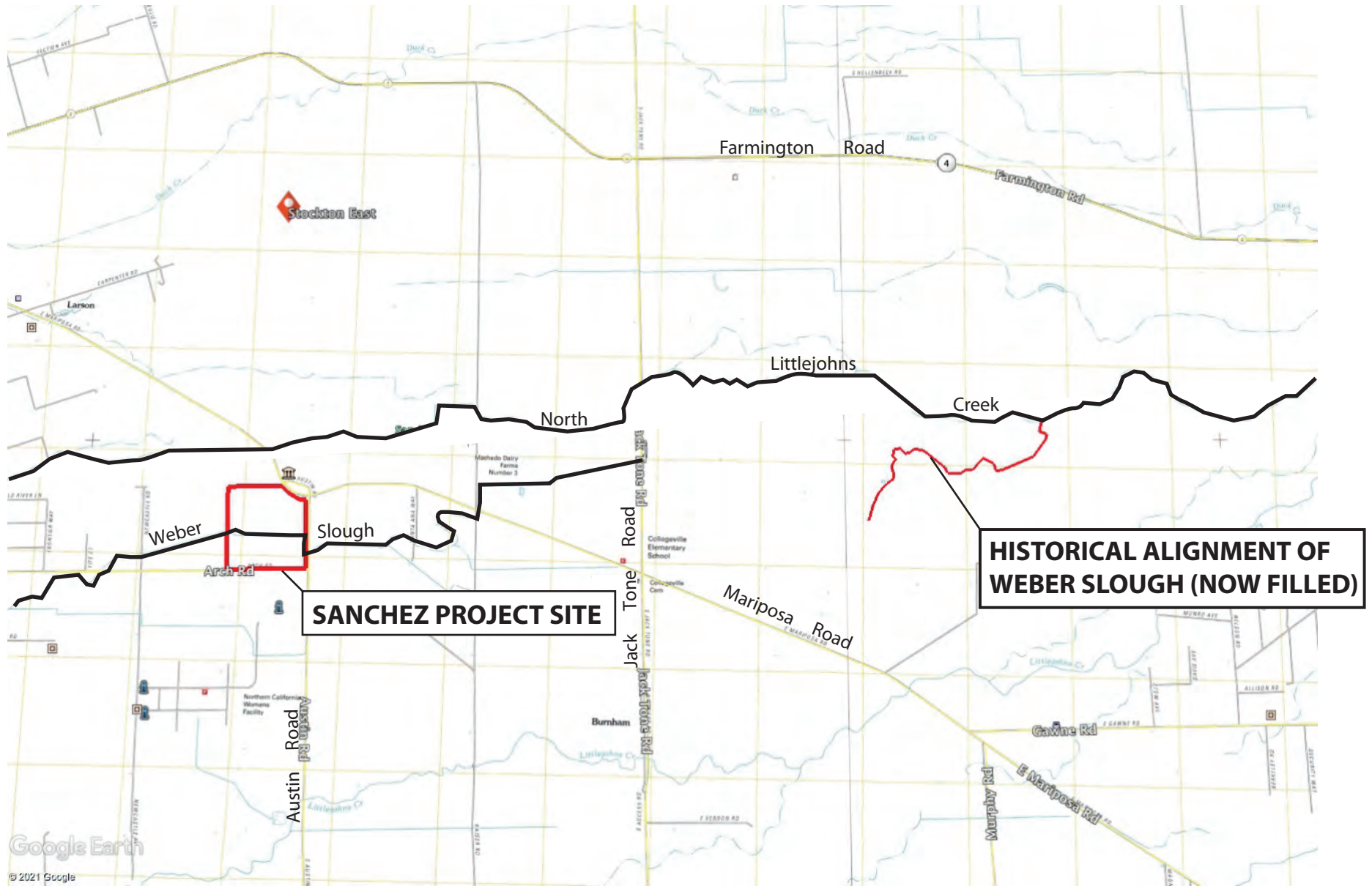


Figure 11
 HISTORICAL ALIGNMENT OF WEBER SLOUGH (NOW FILLED)