



REGION 9

SAN FRANCISCO, CA 94105

April 2, 2026

Oliver Macpherson
Assistant Planner
Core States Group
18216 72nd Avenue South
Kent, Washington 98032

Via electronic mail

Re: Satisfactory Completion of Screening Processes for Consideration of Threatened and Endangered Species and Historic Properties for Costco Wholesale

Dear Oliver Macpherson:

On November 26, 2025, the U.S. Environmental Protection Agency (EPA), Region 9 received three documents via email submitted by you on behalf of Costco Wholesale ("Source"): a Summary of Evaluation of Threatened or Endangered Species and Historic Properties for New or Modified True Minor Sources in Indian Country Seeking Air Quality Permits by Rule, dated November 26, 2025; a Biological Survey, dated April 3, 2025; and a Class I Cultural Resources Review, dated April 10, 2025. These documents were submitted to demonstrate that the Source had completed the screening processes required for consideration of threatened and endangered species and historic properties.

The same documents were sent to the Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona ("Tribe" or "SRPMIC") on January 21, 2026, via email to Heather M. Swanson, P.E., a Construction Project Manager in the Tribe's Engineering & Construction Services Department, per the requirements of the Code of Federal Regulations (CFR) title 40 section 49.156(f)(6)(iii).

Per 40 CFR 49.156(f)(6)(iii), prior to the submission of the Notification of Coverage (NOC) under the Air Quality Permit by Rule for New or Modified True Minor Source Gasoline Dispensing Facilities in Indian Country ("GDF-PBR"), written confirmation from EPA of the satisfactory completion of the Endangered Species Act (ESA) and National Historic Preservation Act (NHPA) screening processes is required.

Determination

EPA Region 9 has carefully reviewed the documents you provided and other relevant information to determine whether the Source has satisfactorily completed the screening processes for consideration

of threatened and endangered species and historic properties. Based on our review of, and in reliance on, the information and representations provided by the Source, the EPA has determined that the Source has satisfactorily completed these processes.

Additional Information

If the Source qualifies for the GDF-PBR and chooses to be covered under it, you must submit an NOC to the EPA and to the Tribe. The necessary forms for submitting a NOC for the GDF-PBR are available online at <https://www.epa.gov/tribal-air/tribal-minor-new-source-review#gasolinedispensingfacilities>.

Upon receiving the NOC, the NOC will be posted on Region 9's Clean Air Act Permit Actions website¹ and on <https://www.regulations.gov>. We will notify you once the NOC is posted. The posting of the NOC is considered final agency action only with respect to the GDF-PBR's applicability to the Source. Appeals can only be made regarding the applicability of the GDF-PBR to the Source. Appeals must be made to the relevant U.S. Court of Appeals within 60 days of the EPA's final action. See 40 CFR 49.156(f)(6)(v).

You may be subject to enforcement action for failure to obtain a preconstruction permit if the Source is constructed under coverage of the GDF-PBR and the Source is later determined not to qualify for the GDF-PBR.

Pursuant to 40 CFR 49.156(f)(6)(vii), coverage under the GDF-PBR will be invalid if construction is not commenced within 18 months after the date of posting of the NOC, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, unless the EPA extends the 18-month period upon a satisfactory showing that an extension is justified.

If you have any questions, please contact Catherine Valladolid at (415) 947-4103 or valladolid.catherine@epa.gov. Alternatively, you may contact Gerardo Rios, Permits Section Manager, at (415) 972-3974 or rios.gerardo@epa.gov.

Sincerely,

/s/ April 2, 2026

Anita Lee
Acting Director
Air and Radiation Division

ENCLOSURES:

1. Memorandum, "EPA Evaluation of Costco Wholesale's Compliance with the Consideration of Historic Properties Screening Procedures for Coverage under a Permit by Rule," dated March 25, 2026.
2. Memorandum, "EPA Biological Evaluation of Costco Wholesale's Compliance with the Endangered Species Procedures for Coverage under a Permit by Rule," dated March 25, 2026.

¹ See <https://www.epa.gov/caa-permitting/r9-caa-permit-actions#completed>.

cc (via email):

Heather M. Swanson, P.E.

Construction Project Manager, Engineering & Construction Services Department, SRPMIC

Amy Miguel

Manager, Environmental Protection and Natural Resources, SRPMIC



REGION 9

SAN FRANCISCO, CA 94105

March 25, 2026

MEMORANDUM

SUBJECT: EPA Evaluation of Costco Wholesale's Compliance with the Consideration of Historic Properties Screening Procedures for Coverage under a Permit by Rule

TO: Administrative Record for Notification of Coverage under the Air Quality Permit by Rule for New or Modified True Minor Source Gasoline Dispensing Facilities in Indian Country—Costco Wholesale

FROM: Catherine Valladolid, Environmental Engineer
Permits Section, Air and Radiation Division
United States Environmental Protection Agency (EPA), Region 9

Appendix B to the Procedures Appendix A to the Procedures to Address Threatened or Endangered Species and Historic Properties for New or Modified True Minor Sources in Indian Country Seeking Air Quality Permits by Rule ("Appendix B") provides detailed screening procedures for consideration of historic properties. To be eligible for coverage, sources must demonstrate that they meet one of the criteria listed in Appendix B with respect to the National Historic Preservation Act (NHPA), 54 U.S.C. 300101 *et seq.* Sources must then obtain written confirmation from the EPA that the historic property screening procedures processes have been satisfied.

On November 26, 2025, the EPA received a Summary of Evaluation of Threatened or Endangered Species and Historic Properties for New or Modified True Minor Sources in Indian Country Seeking Air Quality Permits by Rule ("Historic Properties Evaluation") and the Class I Cultural Resources Review, dated April 10, 2025, from Oliver Macpherson on behalf of Costco Wholesale ("Source"). The Historic Properties Evaluation and the Class I Cultural Resources Review serve to complete the screening procedures for addressing historic properties prior to submitting a Notification of Coverage under Air Quality Permit by Rule for New or Modified True Minor Source Gasoline Dispensing Facilities in Indian County ("GDF NOC") for the Source. The Historic Properties Evaluation and the Class I Cultural Resources Review were received by the Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona ("Tribe") on January 21, 2026, as required by the Code of Federal Regulations (CFR) title 40 section 49.156(f)(6)(iii).

In the Historic Properties Evaluation, the Source asserts that it meets the "No historic properties affected" criterion of Appendix B. As detailed below, the EPA finds that the Source has demonstrated,

with appropriate documentation, that the Proposed Project meets the “no historic properties affected” criterion and that the Source has satisfactorily completed the historic property screening process.

Project Description

The Proposed Project is the construction and operation of Costco Wholesale, a new warehouse store and fuel station to be located on approximately 22.5 acres of land within the Tribe’s reservation. The Proposed Project would be located at the northeast corner of North Pima Road and East Indian School Road in Scottsdale, Arizona. The store will be approximately 156,000 square feet, with a loading dock, parking stall, and driving aisles. The fueling station will consist of 40 gasoline-only refueling stations, three 40,000-gallon underground storage tanks, and one 1,500-gallon storage tank. A Stage I vapor recovery system will be used at the fueling station. The Proposed Project area is bounded by Loop 101 Freeway to the east, open space to the south, N Pima Road to the west, and open space to the north.

Description of Undertaking

Pursuant to the NHPA regulations at 36 CFR 800.16(y), an “undertaking” is defined as a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; and those requiring a federal permit, license, or approval.

The Source is required to obtain a tribal minor New Source Review (NSR) permit under the Federal Minor NSR Program in Indian Country (40 CFR 49.151-165). The Source has elected to obtain coverage under the Permit by Rule for New or Modified True Minor Source Gasoline Dispensing Facilities in Indian Country (“GDF PBR”) as codified at 40 CFR 49.164. Because the Proposed Project requires coverage under this federal permit, the Proposed Project falls under the NHPA definition of an undertaking.

Class I Cultural Resources Review

The Class I Cultural Resources Review provided by the Source was prepared by the Tribe’s Community Development Department Environmental Protection and Natural Resources Division (CDD/EPNR) on April 10, 2025. The Source also provided a letter dated March 23, 2026, from Shane Antone, the Tribe’s Tribal Historic Preservation Officer (THPO). In this letter, the Tribe’s THPO concurred on CDD/EPNR’s determination of “no historic properties affected.”

Area of Potential Effects

In accordance with 36 CFR 800.4(a)(1), the EPA has determined the Area of Potential Effects (APE) for the Proposed Project. The actual development area is approximately 22.5 acres; however, the EPA has defined the APE as approximately 64 acres to include land that may serve as utility tie-ins, access routes, and areas where ground disturbance and construction activities may occur. The APE is bounded to the south by Indian School Road, to the east by Arizona Route 101, and to the west by North Pima Road. The APE is bounded to the north by the imaginary continuation of East Camelback Road.

Effect Analysis

A records review of the CDD/EPNR project files revealed that surveys from previous projects incorporated the entirety of the APE. Two archaeological sites were previously recorded within the APE, SRPMIC-153 and M-12.

Approximately 960 feet south of the Proposed Project site, artifacts were discovered in 2016 at site SRPMIC-153. The artifacts consisted of redeposited household trash and construction debris dating from the 1930s and 1940s. Representative whole artifacts were collected but no further study was recommended. The Site was subsequently destroyed during excavations.

Archaeological site M-12 was originally recorded some time before 1971, however surveys conducted in the 21st century have been unsuccessful in finding any trace of the site. There is a site about one mile south of the APE, SRPMIC-154, that matches the description of M-12; it's possible that the site was improperly plotted. Otherwise, any evidence of the site might be considered destroyed.

Previous surveys and evaluations have revealed an absence of historic and cultural resources within the APE. CDD/EPNR recommends that the Proposed Project proceed as planned with no further detailed cultural resources investigations necessary. Consequently, the EPA has determined that the Proposed Project will have no effect on historic properties within the APE.

Conclusion

Considering all the information available, the Source has demonstrated that the Proposed Project will have no effect on historic properties. The Source has satisfactorily completed the historic property screening process.



REGION 9

SAN FRANCISCO, CA 94105

March 25, 2026

MEMORANDUM

SUBJECT: EPA Biological Evaluation of Costco Wholesale's Compliance with the Endangered Species Procedures for Coverage under a Permit by Rule

TO: Administrative Record for Notification of Coverage under the Air Quality Permit by Rule for New or Modified True Minor Source Gasoline Dispensing Facilities in Indian Country—Costco Wholesale

FROM: Catherine Valladolid, Environmental Engineer
Permits Section, Air and Radiation Division
United States Environmental Protection Agency (EPA), Region 9

Appendix A to the Procedures to Address Threatened or Endangered Species and Historic Properties for New or Modified True Minor Sources in Indian Country Seeking Air Quality Permits by Rule ("Appendix A") provides detailed screening procedures for consideration of threatened and endangered species. To be eligible for coverage, sources must demonstrate that they meet one of the criteria listed in Appendix A with respect to the protection of any and all species that are federally-listed as threatened or endangered under the Endangered Species Act (ESA), 16 U.S.C. 1531 *et seq.*, or of habitat that is federally-designated as "critical habitat" under the ESA. Sources must then obtain written confirmation from the EPA that the threatened or endangered species screening procedures processes have been satisfied.

On November 26, 2025, the EPA received a Summary of Evaluation of Threatened or Endangered Species and Historic Properties for New or Modified True Minor Sources in Indian Country Seeking Air Quality Permits by Rule ("Species Evaluation") and a Biological Survey, dated April 3, 2025, from Oliver Macpherson on behalf of Costco Wholesale ("Source"). The Species Evaluation and Biological Survey serve to complete the screening procedures for addressing threatened or endangered species prior to submitting a Notification of Coverage under Air Quality Permit by Rule for New or Modified True Minor Source Gasoline Dispensing Facilities in Indian County ("GDF NOC") for the Source. The Species Evaluation and Biological Survey were received by the Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona ("Tribe") on January 21, 2026, as required by the Code of Federal Regulations (CFR) title 40 section 49.156(f)(6)(iii).

In the Species Evaluation, the Source asserts that Criterion A of Appendix A applies with respect to listed species eligibility criteria. Criterion A states, “No federally-listed threatened or endangered species or designated critical habitat(s) of such species are likely to occur within the action area for your project.” As detailed below, the EPA finds that the Source has demonstrated, with appropriate documentation, that the proposed project meets Criterion A of the listed species-related eligibility criteria.

Project Description and Action Area

The Proposed Project is the construction and operation of Costco Wholesale, a new warehouse store and fuel station to be located on approximately 22.5 acres of land within the Tribe’s reservation. The Proposed Project would be located at the northeast corner of North Pima Road and East Indian School Road in Scottsdale, Arizona. The store will be approximately 156,000 square feet, with a loading dock, parking stall, and driving aisles. The fueling station will consist of 40 gasoline-only refueling stations, three 40,000-gallon underground storage tanks, and one 1,500-gallon storage tank. A Stage I vapor recovery system will be used at the fueling station.

This Biological Evaluation considers potential effects within a space that includes the 22.5-acre area defined as the Proposed Project site plus additional land that will include utility tie-ins, driveway access, communication services, laydown yards, areas of ingress and egress, and areas where ground disturbance and construction activities are likely to impact environmental and habitat use. This 64-acre area is considered the Action Area. According to the Biological Survey, the Action Area contains vegetation that matches the Sonoran desertscrub biotic community. The Action Area adjoins commercial and highly developed residential areas. It is bounded to the south by Indian School Road, to the east by Arizona Route 101, and to the west by North Pima Road. The Action Area is bounded to the north by the imaginary continuation of East Camelback Road.

Listed Species

On March 19, 2026, the EPA generated a United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) Report. The IPaC Report includes a list of threatened and endangered species that may occur in the Action Area. The list includes four species: cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*), California least tern (*Sternula antillarum browni*), yellow-billed cuckoo (*Coccyzus americanus*), and Gila topminnow (incl. Yaqui) (*Poeciliopsis occidentalis*). The list also includes the monarch butterfly (*Danaus plexippus*) as a proposed threatened species.

Critical Habitat

As identified in the March 19, 2026 IPaC Report, the USFWS has confirmed that there is no federally designated critical habitat for the yellow-billed cuckoo that overlaps with the Action Area.

There is proposed critical habitat for the monarch butterfly; however, as identified in the December 12, 2024 preamble of the proposed rule for designation of critical habitat for the monarch butterfly,¹ the proposed critical habitat for the monarch butterfly does not overlap with the Action Area.

¹ 89 FR 100662.

There is currently no designated critical habitat for the cactus ferruginous pygmy-owl, California least tern, or Gila topminnow. Therefore, the EPA has determined that the action will not result in the destruction or adverse modification of any designated or proposed critical habitat.

Criterion Analysis

Based on the information provided, consultation under section 7 of the ESA, 16 U.S.C. 1536, has not occurred in connection with another Federal Agency's involvement with the Source. The Source has also not been permitted under section 10 of the ESA, 16 U.S.C. 1539. Criterion D and Criterion E of Appendix A do not apply to the Source.

To qualify for Criterion A, the Source must show that no listed species or critical habitat are likely to occur in the Action Area. The February 10, 2026 IPaC Report confirmed that there are no critical habitats or proposed critical habitats in the Action Area. See Table 1.

Table 1. Summary of Federally Protected and Proposed Species and Critical Habitats

Species Name	Scientific Name	USFWS Status	Critical Habitat
Cactus ferruginous pygmy-owl	<i>Glaucidium brasilianum cactorum</i>	Threatened	No designated critical habitat
California least tern	<i>Sternula antillarum browni</i>	Endangered	No designated critical habitat
Yellow-billed cuckoo	<i>Coccyzus americanus</i>	Threatened	Critical habitat does not overlap with Action Area
Gila topminnow (incl. Yaqui)	<i>Poeciliopsis occidentalis</i>	Endangered	No designated critical habitat
Monarch butterfly	<i>Danaus plexippus</i>	Proposed Threatened	Proposed critical habitat does not overlap with Action Area

The Biological Survey submitted by the Source was completed by certified wildlife biologist Vicki Olmstead. In an email dated February 23, 2026 ("February email"),² the Source clarified that the zone surveyed for the Biological Survey was the Action Area. No federally-listed or proposed endangered or threatened species were observed within the Action Area during the field assessment for the Biological Survey. Based on the Biological Survey, clarifications provided by the Source in the February email, and information available on the federally protected and proposed species, it has been determined that none of the listed species are likely to occur in the Action Area.

Cactus ferruginous pygmy-owl require vegetation in fairly dense thickets or woodlands and the presence of trees or columnar cacti large enough to support cavities for nesting.³ Because the Action Area does not contain the large trees or Saguaro cactuses to serve as nesting habitat, the cactus ferruginous pygmy-owl is unlikely to occur there. Similarly, the Action Area lacks nesting habitat for the California least tern. Nesting sites for the California least tern are open sandy beaches, salt flats within

² Email dated February 23, 2026, from Oliver Macpherson, Assistant Planner, Core States Group, to Catherine Valladolid, EPA Region 9, Subject: "RE: AZ - Costco Fuel Facility Salt River Pima-Maricopa Indian Community TBD - EPA Air Quality - New Fuel Facility - BCE #23907."

³ See Species Status Assessment Report for Cactus Ferruginous Pygmy-owl (*Glaucidium brasilianum cactorum*), Version 1.2 (December 2022): <https://iris.fws.gov/APPS/ServCat/DownloadFile/230261>.

estuarine areas, and unvegetated dredge material islands and shorelines near rivers, bays, or lagoons.⁴ Without the appropriate habitat, the California least tern is unlikely to occur in the Action Area. Yellow-billed cuckoos live in wooded habitats with dense cover, with nests often found along streams or rivers.⁵ Because the Action Area does not contain the appropriate habitat, yellow-billed cuckoos are also unlikely to occur in the Action Area. The Gila topminnow (a fish) is unlikely to occur in the Action Area because the Action Area does not contain any bodies of water. Finally, the monarch butterfly needs healthy and abundant milkweed, nectar from flowers, and protection from the elements (e.g., rain, wind, hail, excessive radiation).⁶ The Biological Survey did not identify any milkweed in the Action Area. The monarch butterfly is not likely to occur in the Action Area.

There is no critical habitat in the Action Area, and listed species are unlikely to occur in the Action Area. As a result, the Source meets Criterion A of Appendix A.

Conclusion

Considering all the information available, the Source has demonstrated that the proposed project meets Criterion A of the listed species-related eligibility criteria. The Source has satisfactorily completed the required screening process for consideration of threatened and endangered species.

⁴ See California Least Tern (*Sternula antillarum browni*) 5-Year Review: Summary and Evaluation (August 2025): https://ecosphere-documents-production-public.s3.amazonaws.com/sams/public_docs/species_nonpublish/30669.pdf.

⁵ See Yellow-Billed Cuckoo (*Coccyzus americanus*) by USFWS. See <https://ecos.fws.gov/ecp/species/3911#lifeHistory>.

⁶ See Monarch Butterfly (*Danaus plexippus*) Species Status Assessment Report, Version 2.3 (December 2024): <https://iris.fws.gov/APPS/ServCat/DownloadFile/263030>.