Palomino Place Project

SCH# 2007072020

Final Subsequent Environmental Impact Report

Prepared for
City of Davis

December 2024

Prepared by
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Palomino Place Project
Final Subsequent Environmental Impact Report

SCH# 2007072020

Lead Agency

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1. Introduction and List of Commenters

1. INTRODUCTION AND LIST OF COMMENTERS

1.1 INTRODUCTION

This Final Subsequent Environmental Impact Report (SEIR) contains comments received during the public review period of the Palomino Place Project (proposed project) Draft SEIR. This document has been prepared by the City of Davis, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines Section 15132. The Introduction and List of Commenters chapter of the Final SEIR discusses the background of the Draft SEIR and purpose of the Final SEIR and provides an overview of the organization of the Final SEIR.

1.2 BACKGROUND

The Draft SEIR identifies new significant impacts or substantially more severe significant impacts that the currently proposed project would result in beyond those identified for the Wildhorse Ranch Project in the Wildhorse Ranch Project EIR (2009 EIR) (State Clearinghouse [SCH] No. 2007072020). As part of the analysis, the Draft SEIR identifies applicable mitigation measures from the 2009 EIR, modified mitigation measures, and new mitigation measures that would be required to be implemented as part of the currently proposed project. The following environmental analysis chapters are contained in the Palomino Place Project Draft SEIR:

- Aesthetics;
- Air Quality, Greenhouse Gas Emissions, and Energy;
- Biological Resources;
- Noise;
- Public Services and Utilities;
- Transportation; and
- Other Effects.

In accordance with CEQA, the City of Davis used the following methods to solicit public input on the Draft SEIR:

- A Notice of Preparation (NOP) for the Draft SEIR (see Appendix A of the Draft SEIR) was released for a 30-day public review period from February 22, 2024 to March 25, 2024. The NOP comment letters are included as Appendix B to the Draft SEIR.
- A public scoping meeting was held on March 11, 2024 at the City of Davis Senior Center, Activity Room 646 to solicit comments regarding the scope of the Draft SEIR.
- On August 8, 2024, the Draft SEIR was submitted to the SCH for distribution to State agencies for a 45-day public review period from August 8, 2024 to September 23, 2024.
- On August 8, 2024, a Notice of Availability (NOA) of the Draft SEIR was posted to the City's website (https://www.cityofdavis.org/city-hall/community-development-and-sustainability/development-projects/palomino-place) and mailed to local agencies and interested members of the public.
- A public meeting was held before the Davis Planning Commission on September 11, 2024 to solicit comments regarding the Draft SEIR.

All public comments received on the Draft SEIR are listed in this chapter, and written responses to comments are included in Chapter 2, Response to Comments, as discussed in more detail in Section 1.4 of this chapter.

1.3 PURPOSE OF THE FINAL SEIR

Pursuant to CEQA Guidelines Section 15132, this Final SEIR consists of the following:

1. A list of persons, organizations, and public agencies commenting on the Draft SEIR (included as Section 1.4 of this chapter);
2. Comments received on the Draft SEIR (Chapter 2 of this Final SEIR);
3. Responses to the comments received on the Draft SEIR (Chapter 2 of this Final SEIR);
4. Revisions to the Draft SEIR (Chapter 3 of this Final SEIR); and
5. Any other information added by the Lead Agency.

1.4 LIST OF COMMENTERS

The City of Davis received 20 comment letters during the public comment period on the Draft SEIR for the proposed project. In addition, the City received a comment letter after the close of the public comment period (Letter 2 from the Central Valley Flood Protection Board) on September 24, 2024. The comment letters were authored by the following agencies and members of the public:

Agencies

Letter 1 ..... California Department of Transportation
Letter 2 ..... Central Valley Flood Protection Board
Letter 3 ..... Federal Emergency Management Agency

Individuals

Letter 4 ..... Kathy Bechtold
Letter 5 ..... Richard Berry
Letter 6 ..... Darlene Boyce
Letter 7 ..... Bill Fair
Letter 8 ..... Andrew Fulton
Letter 9 ..... Mark Huising
Letter 10 ..... Taylor, Wiley & Keasling
Letter 11 ..... Austin Kerr
Letter 12 ..... Linh Thai and Al Lin
Letter 13 ..... Marjorie Longo and Michael Maddox
Letter 14 ..... Brian McAloon
Letter 15 ..... Greg Rowe
Letter 16 ..... Greg Rowe
Letter 17 ..... Greg Rowe
Letter 18 ..... Scott Steward
Letter 19 ..... Richard Tsai
Letter 20 ..... Georgina Valencia
Letter 21 ..... Georgina Valencia

In addition, comments were received from nine commenters during the public hearing held on September 11, 2024 to solicit public comments regarding the Draft SEIR. A summary of the comments from the Draft SEIR comment hearing are included as Letter 22.

Letter 22 .....Summary of Verbal Comments: Draft SEIR Public Hearing (September 11, 2024)

1.5 CERTIFICATION OF THE FINAL SEIR

State law requires that the City make several types of CEQA "findings" at the time of final action on the project. Findings describe the conclusions reached regarding particular issues, including specific evidence in support of those conclusions. The Final SEIR typically provides much of the substantial evidence to support these findings. The required findings for the proposed project are as follows:

- Certification of the Final SEIR (CEQA Guidelines Section 15090) – These findings support the adequacy of the Final SEIR for decision-making purposes. The Lead Agency must make the following three determinations in certifying a Final EIR:
    1. The Final EIR has been completed in compliance with CEQA.
    2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
    3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

- Findings Regarding Significant Impacts and Project Alternatives (CEQA Guidelines Section 15091) – These findings explain how the City chose to address each identified significant impact, including the mitigation measures adopted or an explanation of why such measures are infeasible. A discussion of the feasibility of project alternatives is also required by this section (see also CEQA Guidelines Section 15126.6[f]).

Pursuant to CEQA Guidelines Section 15093(b), when a Lead Agency approves a project that would result in significant unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence. The Palomino Place Project would result in significant and unavoidable impacts related to aesthetics, agricultural resources, land use and planning, noise, and transportation. Thus, a Statement of Overriding Considerations must be adopted if the project is approved. The required Findings of Fact and Statement of Overriding Considerations will be included as part of the resolution considered by the City of Davis.

1.6 ORGANIZATION OF THE FINAL SEIR

The Final SEIR is organized into the following four chapters.

1. Introduction and List of Commenters

Chapter 1 provides an introduction and overview of the Final SEIR, describes the background of the Draft SEIR and the purposes of the Final SEIR, provides a list of commenters, and describes the organization of the Final SEIR.

2. Responses to Comments

Chapter 2 presents the comment letters received, and responses to each comment. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter

number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. The response to each comment will reference the comment number.

3. Revisions to the Draft SEIR Text

Chapter 3 summarizes changes made to the Draft SEIR text including clarifications, modifications, and amplifications of the analysis. Section 15088.5 of the CEQA Guidelines states that a lead agency is required to recirculate a Draft EIR when "significant new information" is added to the document after public notice is given of the availability of the Draft EIR for public review under Section 15087 but before certification. Pursuant to this section, the term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not considered "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the City has declined to implement. "Significant new information" requiring recirculation includes any of the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The modifications to the Draft SEIR identified in Chapter 3 have been examined with these requirements and obligations in mind. The City has determined that the provisions of Section 15088.5 of the CEQA Guidelines are not triggered, and recirculation of the Draft SEIR is not required. A more detailed description of this determination will be included in the CEQA Findings of Fact described above.

4. Mitigation Monitoring and Reporting Program

CEQA Guidelines Section 15097 requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the SEIR for the proposed project. The MMRP for the proposed project is included as Chapter 4 of this Final SEIR.

2. Responses to Comments

2. RESPONSES TO COMMENTS

2.1 INTRODUCTION

The Responses to Comments chapter contains responses to each of the comment letters submitted regarding the Palomino Place Project (proposed project) Draft SEIR during the public review period and comments received at the September 11, 2024 Davis Planning Commission meeting.

2.2 MASTER RESPONSE

Many of the commenters raised similar concerns regarding the Increased Density Alternative, which was evaluated in Chapter 6, Alternatives Analysis, of the Draft SEIR, starting on page 6-16. Specifically, commenters expressed concerns pertaining to the causal relationship that exists between increasing a development project's residential density and the resulting decrease in the project's associated vehicle miles traveled (VMT).

For such concerns, the City of Davis has prepared the following master response to allow the City to address the topic of the Increased Density Alternative's effect on associated VMT in a comprehensive manner and without duplication in the individual responses.

Master Response

Travel behavior is influenced by a variety of complex factors. Research continues to evolve in an attempt to better understand how transportation, land use, socioeconomic, behavioral science, technological, and other variables influence travel behavior and related transportation metrics such as VMT. With respect to planning for land use patterns and transportation systems that minimize VMT, transportation experts have acknowledged that a multi-faceted approach that uses a variety of strategies related to the foregoing variables above offers the greatest VMT-reduction potential. However, among the various approaches that can be employed to reduce VMT, sufficient research exists that supports the notion that increasing residential densities, in and of itself, presents a viable approach to reducing VMT.

To quantify the VMT-reduction effects of the Increased Density Alternative, the Draft SEIR uses the California Air Pollution Control Officers Association (CAPCOA) Handbook for Assessing GHG Emission Reductions, Climate Vulnerabilities, and Health and Equity (CAPCOA Handbook). The CAPCOA Handbook is a widely accepted guide for local governments, communities, and project developers to identify and quantify strategies to reduce greenhouse gas (GHG) emissions. The CAPCOA Handbook is grounded in extensive academic and industry research and provides data and methods to help practitioners effectively apply its strategies. CAPCOA Handbook Strategy T-1 (Increase Residential Density) establishes that every one percent increase in residential density results in a 0.22 percent decrease in project VMT, with a maximum reduction potential of 30 percent.

The underlying research supporting the foregoing strategy indicates that higher residential densities are associated with lower vehicle ownership, less driving, and less VMT on a per capita basis. Other underlying research posits that residential self-selection is a factor that contributes

to less driving activity.[1] Residential self-selection refers to choosing to live in a particular neighborhood in part because of the type of transportation options it permits, such as when people who like to drive choose to live in auto-oriented neighborhoods or when people who like to walk choose to live in pedestrian-oriented neighborhoods. People with preferences to live close to destinations may have a difficult time finding such housing, so they can be forced to live in a less-dense, more-auto-oriented neighborhood than they would prefer that is also located further away from the destinations to which they want or need to travel. With the foregoing conditions, people would be required to drive more and travel longer distances, thus increasing the amount of VMT they generate. A hypothetical example of this in the context of the currently proposed project is an existing employee of the University of California, Davis (UC Davis) who prefers to live close to work in Davis, but instead must live in other communities such as Woodland, Elk Grove, or Roseville, due to a lack of viable housing opportunities in Davis.

Importantly, it should be noted that the VMT analysis for the residential components of the currently proposed project and the Increased Density Alternative use the project-generated residential VMT per capita metric. This metric captures VMT associated with all vehicle travel activity that would start or end at the proposed project's residential uses and divides that VMT value by the number of project residents. This, in turn, creates a VMT-generation rate on a per resident basis. When significant impacts to VMT are identified for a residential project, as is the case for the currently proposed project in the Draft SEIR, mitigation measures aim to reduce project-generated residential VMT per capita to the extent feasible. Use of this VMT metric and analysis approach is consistent with the recommended procedures for VMT impact analysis for residential projects as described in the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA.

Residential VMT per capita is different than other VMT metrics, such as total VMT, which includes VMT on roadways within a given geographic area associated with both project-related trips and all background trips generated by other uses. The foregoing different VMT metrics are not to be compared to each other, as they present an "apples-to-oranges" comparison.

The calculations used to derive the Increased Density Alternative VMT findings are presented below, which are based on the CAPCOA Handbook Strategy T-1 data and formula to quantify project VMT reduction associated with increased residential densities (see Figure 2-1). Because the subject of this analysis is the project residential component, by definition, project VMT as defined by CAPCOA is identical to project-generated residential VMT.

$$-17.2\% = \frac{\text{20.0 dwelling units/net acre} - \text{11.2 dwelling units/net acre}}{\text{11.2 dwelling units/net acre}} \; x \; (-0.22)$$

where

A = -17.2 percent. This is the computed value of the percent of project VMT reduction achieved by CAPCOA Handbook Strategy T-1.

B = 20.0 dwelling units/net acre. This value is derived based on the Increased Density Alternative site plan by dividing 260 dwelling units by 13.0 net acres allocated to residential uses.

[1] Journal of the American Planning Association. *Does Compact Development Make People Drive Less?* 2016.

C = 11.2 dwelling units/net acre. This value is derived based on the proposed site plan and by dividing 175 dwelling units by 15.6 net acres allocated to residential uses.

D = -0.22. This is the elasticity value presented in CAPCOA Handbook Strategy T-1.

Figure 2-1
CAPCOA Handbook Strategy T-1 Data and Formula

GHG Reduction Formula

$$A = \frac{B - C}{C} \times D$$

GHG Calculation Variables

ID	Variable	Value	Unit	Source
Output				
A	Percent reduction in GHG emissions from project VMT in study area	0–30.0	%	calculated
User Inputs				
B	Residential density of project development	[ ]	du/acre	user input
Constants, Assumptions, and Available Defaults				
C	Residential density of typical development	9.1	du/acre	Ewing et al. 2007
D	Elasticity of VMT with respect to residential density	-0.22	unitless	Stevens 2016

Further explanation of key variables:

- (C) – The residential density of typical development is based on the blended average density of residential development in the U.S. forecasted for 2025. This estimate includes apartments, condominiums, and townhouses, as well as detached single-family housing on both small and large lots. An acre in this context is defined as an acre of developed land, not including streets, school sites, parks, and other undevelopable land. If reductions are being calculated from a specific baseline derived from a travel demand forecasting model, the residential density of the relevant transportation analysis zone should be used instead of the value for a typical development.
- (D) – A meta-regression analysis of five studies that controlled for self-selection found that a 0.22 percent decrease in VMT occurs for every 1 percent increase in residential density (Stevens 2016).

The 17.2 percent reduction identified above represents the reduction in project-generated residential VMT. To account for changes to the number of project residents associated with the Increased Density Alternative, further calculations must be applied to derive the reduction in project-generated residential VMT capita that would result from CAPCOA Handbook Strategy T-1. Table 2-1 summarizes those changes.

Table 2-1
Increased Density Alternative: Residential VMT per Capita Changes

Metric	Proposed Project	Increased Density Alternative
Dwelling Units	175	260
Residents[1]	494	735
Net Acres	15.6	13.00
Dwelling Units/Net Acre	11.2	20.0
Residential VMT per Capita[2,3]	33.03	18.38
Residential VMT per Capita Change[3]	0%	-44.4%
Total Residential VMT[2,3]	16,317	13,507
Total Residential VMT Change[3]	0%	-17.2%

1 Palomino Place project residents estimated from the Sacramento Area Council of Governments' (SACOG) SACSIM19 travel demand model. Estimates for alternatives presume consistent occupancy of approximately 2.82 residents per dwelling unit.
2 Tour-based residential VMT per capita estimated using SACOG SACSIM19 travel demand model.
3 Residential VMT reductions estimated using CAPCOA Handbook Strategy T-1.

Source: Fehr & Peers, 2024.

Table 2-2
Residential VMT per Capita: Significance Threshold Comparison

Metric	Residential VMT per Capita
Existing City of Davis Average	30.1
City of Davis Significance Threshold[1]	25.6
Existing SACOG Region Average	21.7
SACOG Region Significance Threshold[2]	18.4
Proposed Project	33.03
Increased Density Alternative	18.38

1 Represents 85 percent of existing City of Davis residential VMT per capita average.
2 Represents 85 percent of existing SACOG Region residential VMT per capita average.

Source: Fehr & Peers, 2024.

As shown in Table 2-2, the currently proposed project's residential VMT per capita of 33.03 would exceed both the local and regional significance thresholds, whereas the Increased Density Alternative's 18.38 residential VMT per capita would be below both significance thresholds. Based on the above, the calculations used to derive the Increased Density Alternative VMT findings are based on widely accepted research and methods, and the Draft SEIR's analyses and conclusions of the Increased Density Alternative are adequate.

2.3 RESPONSES TO COMMENTS

Each bracketed comment letter is followed by numbered responses to each bracketed comment. The responses amplify or clarify information provided in the Draft SEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are either discussed or noted for the record. Where revisions to the Draft SEIR text are required in response to the comments, such revisions are noted in the response to the comment, and are also listed in Chapter 3 of this Final SEIR. All new text is shown as <u>double underlined</u> and deleted text is shown as ~~struck through~~.

Letter 1

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 821-8401
www.dot.ca.gov

September 20, 2024

GTS# 03-YOL-2024-00271
SCH # 2007072020

Mr. Eric Lee, Senior Planner
City of Davis
Department of Community Development and Sustainability
23 Russell Blvd #2
Davis, CA 95616

Palomino Place Project

Dear Mr. Lee,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

1-1 The project is located on the north side of East Covell Boulevard on an existing property known as Wildhorse Ranch and/or Duffel Horse Ranch in the City of Davis, California. The project is approximately 25.8-acres and about 1.8 miles northwest of Interstate 80 (I-80). The proposed project would entail the demolition of two on-site duplex buildings and barn, and the construction of up to 175 new residential units, consisting of cottages, half-plex townhomes, single-family residences, and multi-family apartments. The existing ranch home would be retained and renovated. Recreational facilities would include a USA Pentathlon Training Facility, pool complex, and obstacle course. The project would also include new on-site roadways; utility improvements; and open space, landscaping, and trails. The project would require the following entitlements from the City: Vesting Tentative Subdivision Map, Site Plan and Architectural Review for the USA Pentathlon Training Facility and pool complex, and an Affordable Housing Plan. The project would invoke the Builder's Remedy. Based on the Subsequent Environmental Impact Report (SEIR) provided, Caltrans has the following requests and recommendations:

Letter 1
Cont.

Highway Operations / Forecasting & Modeling

1-2 The transportation analysis of the SEIR (Chapter 4.6) is based on a Transportation Impact Study (TIS), prepared by Fehr & Peers in July 2024 and presented in Appendix H of the document. The resubmittal of the documents includes the Local Transportation Analysis (LTA) prepared August 2024 by Fehr & Peers.

The SEIR, TIS, and LTA include freeway off-ramp queueing analysis for weekday peak hours at the I-80/Mace Boulevard/Chiles Road interchange. However, the analysis was only performed for Existing and Existing Plus Project conditions. The LTA states that Cumulative analysis will be complete as a part of the Village Farms Davis project and Shriners Property project review processes. Caltrans District 3 Office of Freeway Operations looks forward to reviewing the analysis upon submittal.

1-3 Caltrans District 3 Office of Freeway Operations notes that the results in the LTA (dated August 2024) are not consistent with those of the TIS (dated July 2024), but the conclusions of the analysis would not change because of the discrepancies. Therefore, Caltrans District 3 Office of Freeway Operations has no comments at this time but will provide comments for the Palomino Place project Cumulative analysis when reviewing the Village Farms Davis project and Shriners Property project.

Encroachment Permit

1-4 Any project or work, including access modification and drainage work, that takes place along or within the State's right of way (ROW) requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to Encroachment Permits Offices as indicated below:

Hikmat Bsaibess
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901
D3encpermit@dot.ca.gov

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

Letter 1
Cont.

If you have any questions regarding these comments or require additional information, please contact Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,

GARY ARNOLD, Branch Chief
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3

"Provide a safe and reliable transportation network that serves all people and respects the environment"

LETTER 1: GARY ARNOLD, CALIFORNIA DEPARTMENT OF TRANSPORTATION

Response to Comment 1-1

The comment is an introductory statement and summarizes the project location and description. The comment does not address the adequacy of the Draft SEIR.

Response to Comment 1-2

The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Response to Comment 1-3

In response to the comment and for clarification purposes, Table 4.6-6 on page 4.6-39 of the Draft SEIR is hereby revised, as follows:

Table 4.6-6
Freeway Off-Ramp Queuing – Existing Plus Project Conditions

Off-Ramp	Off-Ramp Distance[1]	Maximum Queue Length[2]			
		Existing Conditions		Existing Plus Project Conditions	
		AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Mace Boulevard/I-80 WB Off-Ramp	1,200 feet	200 feet	~~200 feet~~ 175 feet	200 feet	~~250 feet~~ 200 feet
Chiles Road/I-80 EB Off-Ramp	1,100 feet	125 feet	175 feet	125 feet	~~175 feet~~ 200 feet

Notes:
1. Measured from the intersection stop bar to the gore point of the freeway off-ramp. Does not include auxiliary lane on freeway mainline.
2. Maximum queue estimates are based on results from SimTraffic micro-simulation model. Queues are maximum per lane, rounded up to the nearest 25 feet.

Source: Fehr & Peers, 2024.

The above revisions are for clarification purposes to ensure consistency between the Transportation Impact Study (TIS) prepared for the currently proposed project by Fehr & Peers (see Appendix H of the Draft SEIR) and Fehr & Peers' Local Transportation Analysis (LTA) prepared for the purposes of allowing the City to review the project's consistency with General Plan Level of Service (LOS) goals and policies. The foregoing revisions do not change the conclusions of the Draft SEIR.

Response to Comment 1-4

The proposed project does not include improvements that would result in encroachments on the State's right-of-way (ROW). The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Letter 2

STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY **GAVIN NEWSOM**, GOVERNOR
CENTRAL VALLEY FLOOD PROTECTION BOARD
3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609

September 24, 2024

Eric Lee
Senior Planner
City of Davis, Department of Community Development and Sustainability
23 Russell Boulevard, Suite 2
Davis, CA 95616
elee@cityofdavis.org

Subject: Comments for the Draft Subsequent Environmental Impact Report, Palomino Place Project, SCH# 2007072020, Yolo County

Dear Eric Lee,

2-1 The Central Valley Flood Protection Board (Board) appreciates the opportunity to comment on the Draft Subsequent Environmental Impact Report (SEIR) for the proposed Palomino Place Project (proposed project).

2-2 The proposed project involves constructing a new sewer line alignment using jack and bore processes that will cross Davis Drain (referred to as Channel A, Covell Drain, and Wild Horse Channel in the Draft SEIR), a regulated stream that is within the Board's permitting authority. Therefore, an encroachment permit may be required for proposed project activities.

2-3 California Code of Regulations, Title 23 provides standards that govern the design and construction of projects that affect the flood control works and floodways. Board staff recommends that you review Title 23 Standards, including Sections 112 (Streams Regulated and Nonpermissible Work Periods) and 123 (Pipelines, Conduits, and Utility Lines). Any deviation or variation from these standards will require approval from the Board.

2-4 As mentioned in the modified mitigation measure 4.8-2, stormwater flows from the proposed project will be directed to Davis Drain (referred to as Channel "A" in the mitigation measure). Board staff are concerned with additional stormwater runoff into Davis Drain resulting from the proposed project because in the recent past flood events, Davis Drain has had difficulty conveying the existing runoff. A hydrology and hydraulic analysis should be conducted on the current capacity of Davis Drain and incorporate improvements and for conveyance through the culverts discharging into the Willow Slough Bypass. Overall, Board staff recommend the Draft SEIR include information on how the City of Davis will address these additional flows to Davis Drain.

2-5 **Responsibility of the Central Valley Flood Protection Board**
The Board is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley.

Letter 2
Cont.

Encroachment Permit

2-6 Per California Code of Regulations, Title 23, Waters, Division 1 (Title 23), Section 6, approval by the Board is required for all proposed work or uses, including the alteration of levees within any area for which there is an Adopted Plan of Flood Control within the Board's jurisdiction. In addition, Board approval is required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream identified in Title 23, Table 8.1. Specifically, Board jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside Board's Designated Floodways. Activities outside of these limits which could adversely affect Federal-State flood control facilities, as determined by Board staff, are also under the Board's jurisdiction. Permits may also be required for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed.

2-7 Federal permits, including USACE Section 404, may be required for the proposed project. In addition to federal permits, state and local agency permits, certification, or approvals may also be required. State approvals may include, but are not limited to, California Department of Fish and Wildlife's Lake and Streamed Alteration Agreement and Central Valley Regional Water Quality Control Board's Section 401 Water Quality Certification and/or Waste Discharge Requirement. The Applicant must obtain all authorizations that the proposed project may require.

Flood Impacts Analysis

Pursuant to Section 15 of Title 23, the Board may deny an encroachment permit if the proposed project could:

2-8
- Jeopardize directly or indirectly the physical integrity of levees or other works
- Obstruct, divert, redirect, or raise the surface level of design floods or flows, or the lesser flows for which protection is provided
- Cause significant adverse changes in water velocity or flow regimen
- Impair the inspection of floodways or project works
- Interfere with the maintenance of floodways or project works
- Interfere with the ability to engage in flood fighting, patrolling, or other flood emergency activities
- Increase the damaging effects of flood flows
- Be injurious to, or interfere with, the successful execution, functioning, or operation of any adopted plan of flood control
- Adversely affect the State Plan of Flood Control, as defined in the California Water Code

2-9 As a responsible agency under the California Environmental Quality Act (CEQA), the Board will need to have adequate information in order to evaluate whether to issue a permit at a future date. Accordingly, please be prepared to provide specific analyses to determine if the proposed project could result in any potential impacts listed above. This includes direct impacts to facilities under construction, as well as indirect impacts from the project to surrounding facilities. This encompasses any proposed work that contemplates modifications to a SPFC Facility or operation of any adopted plan of flood control or the hydrology of the water ways. It is therefore

Letter 2
Cont.

2-9 Cont. recommended that the environmental document include a specific flood facility impacts analysis section.

Closing

2-10 The potential risks to public safety, including increased flood risks, need to be considered when developing proposed projects that seek to modify flood control works or the hydrology of the water ways. Board staff is available to discuss any questions you have regarding the above comments. Please contact Jordan Robbins at (916) 524-3454, or via email at Jordan.Robbins@CVFlood.ca.gov if you have any questions.

Sincerely,

Jamie Silva

Jamie Silva
Environmental Program Manager

cc: Office of Planning and Research
State.Clearinghouse@opr.ca.gov

LETTER 2: JAMIE SILVA, CENTRAL VALLEY FLOOD PROTECTION BOARD

Response to Comment 2-1
The comment is an introductory statement and does not address the adequacy of the Draft SEIR.

Response to Comment 2-2
As alluded to by the comment and discussed on page 3-13 of the Draft SEIR, the currently proposed project would include 2,270 lineal feet of off-site 12-inch sewer line that would be extended from an existing 42-inch sewer trunk main to the north of the project site to the project site's northeastern corner. The new sewer line would be installed within the Wildhorse Agricultural Buffer and require a crossing of Channel A, which would be accomplished through a jack-and-bore process. As discussed under Impact 4.3-14, which starts on page 4.3-75, the jack-and-bore process is anticipated to avoid adverse environmental effects to Channel A.

Nonetheless, as part of project approval through the City's planning process, the currently proposed project would be conditioned by the City of Davis to obtain applicable permits from responsible and trustee agencies such as the Central Valley Flood Protection Board that would be necessary for developing the project components, including any required encroachment permits.

Response to Comment 2-3
The comment provides background information regarding State construction standards for projects that affect flood control works and floodways. The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Response to Comment 2-4
The Draft SEIR evaluates the potential for the currently proposed project to substantially alter the existing drainage pattern of the project site in a manner that would create or contribute runoff water that would exceed the capacity of existing and planned stormwater drainage systems or provide substantial additional sources of polluted runoff in the Other Effects chapter under Section 4.7.6, which starts on page 4.7-12. As discussed therein, the 2009 EIR previously concluded that implementation of Mitigation Measure 4.8-2 from the 2009 EIR, which requires the project applicant to submit a design-level engineering report on the stormwater detention and conveyance system and implement the drainage system on-site, would reduce the potential impact associated with the Wildhorse Ranch Project to a less-than-significant level.

According to the Tentative Map Drainage Design Memorandum (Drainage Memo) prepared for the currently proposed project by Cunningham Engineering (see Appendix K of the Draft SEIR),[2] an existing 36-inch storm drain line conveys runoff collected by an inlet in the project site's northeastern corner to Channel A. The storm drain line was originally sized to convey the project site's 10-year peak discharge, assuming agricultural use, and has a design discharge of 6.2 cubic feet per second (cfs). The currently proposed project would continue to discharge to the 36-inch storm drain line. During the 100-year 24-hour storm event, when flow conditions prevent flows from Channel A to drain downstream into the Willow Slough Bypass, flows from the watershed spill east, ultimately ponding at the levee adjacent to the Yolo Bypass within the East Davis watershed. With incorporation of three acre-feet (AF) of on-site detention storage as part of the

[2] Cunningham Engineering. *Palomino Place – Tentative Map Drainage Design Memo*. March 30, 2024.

currently proposed project, the Drainage Memo found that the increase in ponded volume in the East Davis watershed as a result of the project during a 100-year, 24-hour storm event would be approximately 0.008 percent. Such an increase is considered negligible without any measurable impact to the peak water surface elevation or limits of ponding downstream.

Additionally, as discussed on page 4.7-15 of the Draft SEIR, the Drainage Memo compared the estimated timing of 100-year peak flows from the project site during project operation with the timing of Channel A's peak flows. In comparing the peak times during the 100-year 10-day storm, the developed project site's peak outflow (6.2 cfs) preceded Channel A's peak flow (over 1,000 cfs) by approximately six hours. By the time Channel A's peak flow was attained, the site's outflow had receded by almost 50 percent. Thus, the Drainage Memo found that post-development flows from the project site during project operation would not have an adverse effect on 100-year peak downstream flows in Channel A. However, because a final drainage plan has not been developed for the currently proposed project, the Draft EIR concludes Mitigation Measure 4.8-2 from the 2009 EIR (as slightly modified by the Draft SEIR) would still be applicable and would ensure the currently proposed project does not result in a new significant impact or substantially more severe significant impact beyond what was identified in the 2009 EIR. Thus, the Draft SEIR addresses how additional stormwater flows generated by the proposed project would be accommodated by Channel A and the analyses and conclusions contained therein are adequate.

Response to Comment 2-5

The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Response to Comment 2-6

The comment provides background information regarding when encroachment permits are required from the Central Valley Flood Protection Board. The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Response to Comment 2-7

With respect to the potential for the project applicant to require authorization under Sections 404 and 401 of the Clean Water Act (CWA), as discussed under Impact 4.3-14, which starts on page 4.3-75 of the Draft SEIR, the project site does not contain aquatic resources of any kind. Although a total of 0.052-acre of aquatic resources was mapped within the study area, the foregoing acreage is associated with the off-site Channel A, which would not be impacted by the proposed project during installation of the off-site sewer line, as the sewer line crossing of Channel A would be completed through a jack-and-bore process. As such, the Draft SEIR concludes that the proposed project would not require a Section 404 or 401 permit, as the project would not have a substantial adverse effect on State or federally protected wetlands.

In regard to State approvals to which the currently proposed project could be subject, such as the California Department of Fish and Wildlife's Lake or Streambed Alteration Agreement (LSAA) established by California Fish and Game Code (CFGC) Section 1600 et seq., the Draft SEIR concludes under Impact 4.3-13 that the project would not result in disturbances to the riparian vegetation within the study area, as the project would use jack-and-bore construction methods as part of installation of the off-site sewer line crossing underneath Channel A and the adjacent riparian zone. Although the jack-and-bore process is sometimes associated with an accidental release of drilling mud through a process known as a frac-out, which occurs during drilling operations and involves the inadvertent release of drilling fluids or slurry into materials other than

the intended entry and exit points, the Draft SEIR notes on page 4.3-74 that the injection of drilling mud would not be necessary during jack-and-bore activities due to the alluvial soil types present at the proposed Channel A crossing. Therefore, the Draft SEIR concludes that the proposed project would not include risk of frac-out associated with boring activities, and the currently proposed project would not result in a new significant impact or substantially more severe significant impact related to the project having a substantial adverse effect on riparian habitat identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS), beyond what was previously identified in the 2009 EIR. Thus, the currently proposed project would not require an LSAA from CDFW.

Response to Comment 2-8

The comment provides background information regarding Central Valley Flood Protection Board's authority to deny requests for an encroachment permit. The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Response to Comment 2-9

The currently proposed project does not include any components that would necessitate modifications to a State Plan for Flood Control (SPFC) facility. The Draft SEIR evaluates the potential for the currently proposed project to result in a new significant impact or substantially more severe significant impact beyond what was identified in the 2009 EIR related to hydrology and water quality in accordance with the CEQA Guidelines Appendix G, Section X environmental checklist questions, starting on page 4.7-12 of the Draft SEIR. Thus, the analyses and conclusions contained therein are adequate. In addition, please see Response to Comment 2-4.

As part of project approval through the City's planning process, the currently proposed project would be conditioned by the City of Davis Department of Community Development and Sustainability to obtain applicable permits from relevant agencies with regulatory authority, including the Central Valley Flood Protection Board, if required.

Response to Comment 2-10

The comment is a conclusion statement and does not address the adequacy of the Draft SEIR. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

August 22, 2024

Eric Lee, Senior Planner
City of Davis Community Development Department
23 Russell Boulevard, Suite 2
Davis, California 95616

Dear Mr. Lee:

3-1 This is in response to your request for comments regarding Notice of Availability of a Draft Subsequent Environmental Impact Report (Draft SEIR) and Public Meeting to Provide Comments on the Draft SEIR – Project Name: Palomino Place Project .

3-2 Please review the current effective Flood Insurance Rate Maps (FIRMs) for the City of Davis (Community Number 060424), Maps revised June 18, 2010, and Yolo County (Community Number 060423), Maps revised May 16, 2012. To locate FIRMs online, visit the Map Service Center (MSC) at https://msc.fema.gov. Please note that the City of Davis, Yolo County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

3-3 A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

www.fema.gov

3-3 Cont.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at https://www.fema.gov/flood-maps/change-your-flood-zone/paper-application-forms.

3-4

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Davis floodplain manager can be reached by calling Brian Fenty, Chief Building Official, at (530) 757-5655. The Yolo County floodplain manager can be reached by calling Scott Doolittle, Plan Check Engineer, at (530) 666-8609.

If you have any questions or concerns, please do not hesitate to contact Carlos Rendo of the Mitigation staff at carlos.rendo@fema.dhs.gov.

Sincerely,

EDITH C LOHMANN
Digitally signed by EDITH C LOHMANN
Date: 2024.08.24 12:34:35 -07'00'

Edie Lohmann, Acting Branch Chief
Floodplain Management and Insurance Branch

www.fema.gov

Letter 3
Cont.

cc:
Brian Fenty, Chief Building Official, City of Davis
Scott Doolittle, Plan Check Engineer, Yolo County
Alex Acosta, State of California, Department of Water Resources, North Central Region Office
Kelly Soule, State of California, Department of Water Resources, Sacramento Headquarters Office
Carlos Rendo, NFIP Planner, DHS/FEMA RIX
Jeffrey Symly, Acting Environmental Officer, DHS/FEMA RIX

LETTER 3: EDITH LOHMANN, FEDERAL EMERGENCY MANAGEMENT AGENCY

Response to Comment 3-1
The comment is an introductory statement and does not address the adequacy of the Draft SEIR.

Response to Comment 3-2
As discussed on page 4.7-15 in Chapter 4.7, Other Effects, of the Draft SEIR, the project site is currently located within a Federal Emergency Management Agency (FEMA) Zone X, which is an Area of Minimal Flood Hazard. The comment does not address the adequacy of the Draft SEIR.

Response to Comment 3-3
The comment provides background information regarding FEMA's requirements for new development within floodplains and does not address the adequacy of the Draft SEIR.

Response to Comment 3-4
The comment provides background information regarding communities participating in the National Flood Insurance Program (NFIP) and does not address the adequacy of the Draft SEIR.

Letter 4

From: Kathy Bechtold <kbechtold58@gmail.com>
Sent: Tuesday, September 10, 2024 2:44 PM
To: Eric Lee <ELee@cityofdavis.org>
Subject: Palomino Place comments.

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Dear Mr. Lee,

My comments regarding the plans for Palomino place have to do with the proposed US Pentathlon training center.

I am very disappointed that the city would propose this type of use in this neighborhood. Maybe I don't have all the facts or information of how this got put into the plans but it appears to me that this provides very limited use by a very small, select group of Davis residents and non-residents. I recognize that there maybe revenue generated from it but I am concerned that it appears to be all very speculative from the wording I could see in the proposal.

I live in the Slidehill neighborhood across from the planned new development-25 years. I understand the need for more housing but I would hope that in exchange for the increased housing, we in the neighborhood could get something of benefit for many.

4-1

I would suggest another bocce court (the cannery courts are not shaded so there is limited use during the day) or a shuffle board court with shade structures. So many of our parks are limited in use due to lack of shade coverage over the play equipment. These types of park facilities can be used by a large range of age groups. With climate change, future heat anticipated, shading is critical for continued use of our wonderful play/park facilities.

Thank you soliciting our input.

Kathy Bechtold
2300 Temple Drive
Davis

LETTER 4: KATHY BECHTOLD

Response to Comment 4-1

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Letter 5

From: Dick Berry <dicknberry@gmail.com>
Sent: Sunday, September 8, 2024 6:52 PM
To: Eric Lee <ELee@cityofdavis.org>
Subject: Fwd: Palomino Place project Support letter

Dear Mr. Lee,

5-1 I am writing to you in support of the Palomino Place Project from my perspective as a 30 year resident of the City of Davis. I am also delighted to see the Olympic training center included in the Palomino construction plans. As a Hall of Fame fencing champion (United States Fencing Association Hall of Fame class of 2020) and a five time National Epee Fencing Champion (1957-58), I am acutely aware of the importance of good training facilities to support not only young people but athletes of all ages. I am equally pleased to see many more affordable housing options being made available through this Palomino project for those living in Davis.

Richard N "Dick" Berry
Member, Davis Sunrise Rotary Club
Paul Harris Fellow
Volunteer Coach, Davis Fencing Academy
Author, Getting the Point, available on Amazon

LETTER 5: RICHARD BERRY

Response to Comment 5-1

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Letter 6

-----Original Message-----
From: Darlene Boyce <darleneb@dcn.davis.ca.us>
Sent: Friday, September 6, 2024 4:54 PM
To: Planning Commission <PlanningCommission@cityofdavis.org>
Subject: Palomino Place

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

6-1 Please deed restrict all units considered "affordable." Too many "affordable homes" in Davis have been affordable only for the original buyer. Subsequent buyers paid market rates. Makes no sense.

Thank you,
Darlene Boyce

LETTER 6: DARLENE BOYCE

Response to Comment 6-1

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. In addition, please see page 3-16 of the Draft SEIR, which provides that the currently proposed project would include up to 45 affordable units, which would be deed-restricted, as part the project's compliance with Davis Municipal Code Article 18.05.

Letter 7

From: billyfair@aol.com <billyfair@aol.com>
Sent: Sunday, September 8, 2024 5:01 PM
To: Eric Lee <ELee@cityofdavis.org>
Subject: Palomino Place EIR

Hi Eric,

Any EIR should include an analysis of increased traffic on Covell Blvd. AND, with other projects along Covell soon hoping for approval, like Covell Village, Covell Blvd will be bumper to bumper all the time. Have you driven on West Covell lately, especially in the afternoon?

From the internet:
If approved by voters in November, Covell Village would be the largest subdivision ever built in *Davis*, consisting of 1,864 units on over 420 acres of prime farmland.

7-1

All these cars would dump onto Covell or Pole Line Rd. Who is going to pay for the expansion of Pole Line to 4 lanes? Who is going to pay for Covell to be 6 lanes from F St to Mace? Sometimes, traffic is backed up to Harper School from the I-80 overpass. Often, it is a crawl from the F st overpass to the lights at J, light at L, light at Pole Line. Drive it on any afternoon after 2:30pm, and see for yourself. If you dump another 3000 cars daily, you will have many complaints about poor city planning. Planners need to look at the "Big Picture" of these housing projects. A cute name does not mitigate pollution and congestion from the increased traffic that Covell and Pole Line cannot sustain.

Living it every day,
Bill

LETTER 7: BILL FAIR

Response to Comment 7-1

Pursuant to the CEQA Guidelines Section 15064.3, effective July 1, 2020 (subsequent to certification of the 2009 EIR), environmental documents must use VMT rather than LOS as the metric to analyze transportation impacts. Therefore, the analysis included in Chapter 4.6, Transportation, of the Draft SEIR focuses on VMT and not on the effects of the currently proposed project on traffic conditions or congestion along roadways in the project vicinity, such as East Covell Boulevard. The State's requirement to transition from LOS to VMT is aimed at promoting infill development, public health through active transportation, and a reduction in GHG emissions.

Nonetheless, while not required by CEQA, the City's General Plan has adopted LOS policies. To evaluate the proposed project's consistency with said policies, an analysis of LOS will be provided in a separate project-specific LTA prepared by Fehr & Peers. It should be noted that the LTA prepared by Fehr & Peers for the Village Farms Davis Project will account for the proposed project and other planned development projects in the project vicinity, including the Shriners Property and the Davis Innovation and Sustainability Campus (DiSC) 2022 projects. The foregoing projects are also discussed in Chapter 4.6, Transportation, of the Draft SEIR as part of the cumulative setting.

Letter 8

From: Andrew Fulton <andrewfulton90@gmail.com>
Sent: Wednesday, September 4, 2024 7:39 AM
To: Eric Lee <ELee@cityofdavis.org>
Subject: Concerns About High-Density Housing

Dear Mr. Lee,

8-1

I am concerned about the continuation of high-density housing projects in Davis like Palomino Place. These developments lack the space families need, such as backyards for kids to play.

This is contributing to lower school enrollment in DJUSD and families moving to Woodland.

To my knowledge back in the 60s and 70s, housing developments were built with larger lots for families, which helped communities thrive.

Building for families is building for the future—without children, there is no future.

Please consider:

Bigger Lots: Include more single-family homes with larger yards.

Family-Friendly Housing: Balance high-density with low-density options.

Respectfully,

Andrew Fulton

LETTER 8: ANDREW FULTON

Response to Comment 8-1

Potential contributions of development projects to decreases in school enrollment are considered economic or social changes. Although economic or social changes may have an indirect effect on the environment, they alone, without any associated environmental impacts, are not considered significant effects on the environment, as, in accordance with CEQA Guidelines Section 15358(b), effects analyzed under CEQA must be related to a physical change in the environment.

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 9

-----Original Message-----
From: Mark Huising <mark.o.huising@gmail.com>
Sent: Monday, September 23, 2024 4:25 PM
To: Eric Lee <ELee@cityofdavis.org>
Subject: comments on Palomino Place SEIR

Dear Mr. Lee,

Thank you for the opportunity to comment on the SEIR for the Palomino Place development. I have a series of comments, presented in bulletpoint style for clarity. Most of my comments focus on the transportation element of the plan. To frame my comments, it is very clear to me that we need more housing, and I am generally in favor of building more housing in Davis. What type of housing we build, and where in Davis we site this matters. I am a member of the City of Davis Transportation Commission, commenting here on personal title.

9-1

I will note that I was unable to attend the public comment opportunity at the Planning Commission on September 11 due to international travel oblications flowing from my work.

kind regards,

Mark Huising

Non-transportation:
-It is great that the residential component will not use natural gas. It is not clear if this extends to the proposed aquatic center. Maintaining the temperature and water circulation of a large pool is energy intensive. In addition to comments made on PV for this portion to the development, will the use of fossil fuels on site be prevented by using industrial grade heat pumps (air source or geothermal) along with heat recovery chillers as necessary to recoup thermal energy of spent water? Air source water heaters achieve COP that are very high (>3.5) and can use refrigerants with low GWP. There likely are also IRA incentives available.

9-2

-Residential units: will these units be built to exceed prevailing building standard for insulination and envelope tightness. Particularly for the affordable housing units, these are low tech measures with the potential to significantly reduce the cost of space conditioning for minimal additional building cost.

9-3

Transportation:
-In the introduction and at several times throughout the SEIR ‘infill’ is mentioned, sometimes in conjunction with SB473. Please clarify if this project falls within a TPA. It is a development at the periphery of Davis, and therefore not an infill development. It would be good to clarify this.

9-4

Letter 9
Cont.

9-5 -The absence of any Class IV bikeways, including on major arterials such as Covell and Alhambra on the map in Figure 4.6-2 is in stark contrast to the self-proclaimed status of Davis as a US leading bicycle town.

9-6 -Under Emerging Transportation Technology and Travel Options, bicycles, and specifically electric assist bicycles should be listed here on top. These are relatively cheap, very efficient with virtually no GHG emissions and they exist and scale today, with Yolo County and (hopefully soon) CARB offering income-based ebike incentives. The electric assist extends the range to easily 3 miles for many trips at time parity for a car trip for the same distance. In the US 52% of all trips are under 3 miles. Specific to this development, City of Davis CAAP policy focuses on active transportation to downtown, campus and DJUSD schools, which are all within 3 miles from this development. Without embracing ebikes as the low-cost, accessible, equitable super-efficient climate and transportation solution that they are – and planning for them - there is not a scenario where the City of Davis can hope to meet the 61% emission reduction goals from transportation by 2035.

9-7 -On Uber and Lyft, it should be noted that these services have generally increased traffic and associated emissions.

9-8 -Automation of vehicles/connected vehicles: It is speculated that AVs are an improvement, despite ample real-world evidence to indicate that they are less safe for pedestrians and cyclists. The National Highway Safety Administration opened a preliminary investigation after Waymo caused 18 crashes (with other (stationary) cars and stationary objects) https://static.nhtsa.gov/odi/inv/2024/INOA-PE24016-12382.pdf. A self-driving vehicle by Uber killed a pedestrian walking her bike in 2018 in Tempe AZ, with the vehicle detecting the victim but failing to recognize and respond appropriately (https://www.ntsb.gov/investigations/AccidentReports/Reports/HWY18MH010-prelim.pdf). This includes incidents where AVs have been programmed to use class II bike lanes as routes of egress to avoid collisions with another car. The City should assume that AVs will make our streets less safe for non-drivers and will thus be a barrier for citizens to make sustainable travel choices, unless we plan for physically separate travel spaces. The speculation on page 4.6-10 that CVs may reduce collisions has not been borne out, and for collisions with vulnerable road uses such as cyclists and pedestrians is not borne out by any evidence. The City should adhere to the precautionary principle here that these technologies may hurt, not help our ambitions to increase sustainable travel choices. A very large percentage of accidents where people get injured involve cars. Perhaps AVs will be better than human drivers – admittedly a rather low bar. Our focus should be on reducing the number of cars on the road – irrespective of who drives them – as this will improve safety for all road users.

Letter 9
Cont.

9-9 -It should be acknowledged under 'emerging transportation Technology and Travel Options' that vehicles have since the release of the initial 2009 EIR have gotten heavier, accelerate faster (particularly EVs), courtesy of perverse fuel efficiency standards that exempt large trucks and the complete lack of any national or state-wide safety standards for people outside of the vehicle. This actively disincentives sustainable travel choices.

9-10 -The immediate benefit from CVs is that they can and should be speed restricted exactly like ebikes already are.

9-11 -Sharrows are listed as design solutions to improve bicycle access, comfort and safety (Page 4.6-16). It has been shown that painted bike lanes do not improve bicyclist safety and that sharrows are worse than the absence of any markings. In contrast physically protected bike lanes were shown to improve bicyclist safety (https://doi.org/10.1016/j.ijtst.2018.12.003). Policy TRANS 2.2 and 2.3 should be updated to reflect the peer reviewed science.

9-12 -To this point: 4 of 6 improvements achieved under the Beyond Platinum Bicycle Action Plan (4.6-18) are paint-only solutions, and two of these are 'shared lane markers' of the kind that have been shown in the peer-reviewed literature to make safety for cyclists worse.

9-13 -Missing in this plan are maps of continuous safe active transportation corridors (Complete Streets network) from this development to: 1) schools (neighborhood elementary and middle school (Harper?) and DJUSD High School), 2) downtown, 3) campus, which are the locations singled out by performance objective 1.2. Distances and planned number of daily trips. We want people to make these trips by sustainable transportation options, so let's make sure the network for them to get to their destinations is complete.

9-14 -page 4.6-21, clarify that pick-up/drop off trips, which account for 40% of swimmers, would effectively double the number of car trips. Two car trips per swimmer per day. With these numbers (50% drive and park, 40% pick up/drop off, and 10% biking), it will take 130 car trips to transport 100 swimmers to this facility. How do USA Pentathlon, DART and other prospective users of this proposed new facility plan to mitigate the number of vehicle trips? How are these organizations planning to incentivize sustainable transportation choices among their user base? Or charge the actual cost of driving cars that is currently borne by the Davis community in the form of SCC, cost of road construction and maintenance, wear and tear proportional to the road damage done by the vehicle type used?

9-15 -4.6-28, the project proposes no bike lanes on internal streets. Assuming that there will be parking on both sides of the street, I propose that parking will be limited to one side of the street, and that a dedicated protected bike lane will be included on the other. It is acknowledged that 'the project could increase the

Letter 9
Cont.

9-15 Cont. number and severity of bicycle-vehicle conflicts and increase the potential for collisions involving bicyclists' which should be ample reason to plan for physically protected bike lanes. The City cannot possibly hope to incentivize people making sustainable travel choices when the City admits that the streets we design are likely going to increase collisions between bikes and cars. If we hope to meet our 2035 GHG emission reduction goals of 61% we need to design for the traffic we want – not the traffic we have now.

9-16 -SEIR 4.6-2(a and b), make the Class II bike lane (paint) a class IV bike lane on the North leg of East Covell/Monarch. Any dedicated left/right vehicle turn lanes should not cross or take precedent over a continuous protected class IV vehicle lane.

9-17 -On page 4.6-33 it is suggested that the non-residential component (846 daily vehicle trips that are additive, to a facility that currently does not exist) of the proposed aquatic center will somehow reduce VMTs by 1,089 within the region. This analysis defies logic.

9-18 -The use of Davis-specific average VMT of 30 miles per person per day, it would have been very helpful to frame this analysis around who we expect or hoping to attract to live in the new Wildhorse community. If these are people who are currently commuting regionally to work or school, affording them the opportunity to live in Davis would credibly reduce our current regional VMT, even if our new neighbors continue to drive vehicles for local trips. If we attract people who commute long-distance to live in Davis, this would increase VMT.

9-19 Mitigation strategy T-9: I support the strategy of providing free transit to residents, but by singling out the people who will live in the affordable housing element, we unintentionally propagate the stigma that public transport in California is intended for poor people.

9-20 Mitigation strategy T-23. The CAPCOA handbook indicates that the expected emission VMT reduction is up to 2.3%, which is by far the highest % reduction claimed from all CAPCOA mitigation strategy. There is no indication that this max reduction is even remotely achievable for this project, in keeping with the total cost of $2,250, or the cost of a single ebike annually.

9-21 Mitigation strategies, overall the City expects VMT reductions of 2.76%, most of which is to be achieved by mitigation strategy T-23, with no indication that this strategy can achieve anything close to its max VMT reduction potential cited by CAPCOA. Clearly we are falling short of our GHG emission reduction goals by a wide margin. Ostracizing the solution by simply declare these impacts 'significant and unavoidable' and move on might meet the CEQA threshold, especially under Builders remedy for this project, but it fails to even try to meet the bare minimum that is necessary in the face of the climate crisis. I would invite the City and the applicants to at least try and actually close the emissions gap.

Letter 9
Cont.

9-21 Cont. We should be providing incentives for ebikes to double down on Yolo county and anticipated state-wide income-based ebike incentives. At the same time we should be more deliberate in placing the cost of building and maintaining on-street parking, cost of GHG and PM2.5 from driving. Unless we leverage these costs to incentivize better transportation choices, we will not even get close to meeting our 2035 emission reduction goals.

9-22 The access point at Caravaggio and Bonnard should be developed into a short class I shared use path to allow pedestrians and cyclists an easy connection to the rest of the neighborhood immediately to the West.

LETTER 9: MARK HUISING

Response to Comment 9-1

The comment is an introductory statement and does not address the adequacy of the Draft SEIR. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-2

As discussed on page 3-9 of the Draft SEIR, the proposed project would include a 1.4-acre site to accommodate future potential development (i.e., not a component of the proposed project) of recreational facilities that would be available to local sports organizations and the general public within the southeast portion of the project site, immediately east of the southerly half-plex townhomes. The recreational facilities are currently planned to include a two-story, 11,050-sf USA Pentathlon Training Facility, pool complex, and obstacle course, but could accommodate other active or passive recreational facilities and uses. Because plans for the USA Pentathlon Training Facility, pool complex, and obstacle course are currently tentative, specific details regarding the heating of the pool complex are not currently available.

Please also see the analysis and conclusion under Impact 4.2-7 of the Draft SEIR, which starts on page 4.2-61 and evaluates the potential for the currently proposed project to generate GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As detailed therein, the currently proposed project, which was not assumed to restrict natural gas usage from the non-residential components, would not result in a new significant impact or substantially more severe significant impact beyond what was identified in the 2009 EIR, as the proposed project is considered to provide a proportional share of emission reductions and would not inhibit attainment of citywide net carbon neutrality by the year 2040, nor conflict with the City of Davis Climate Action and Adaptation Plan (CAAP).[3]

Response to Comment 9-3

While specific details regarding the proposed residential units' insulation and envelope tightness have not yet been finalized, as discussed on page 4.2-55 of the Draft SEIR, the currently proposed project would be subject to Davis Municipal Code Section 8.01.090, which necessitates that the proposed project comply with the Tier 1 standards of the California Green Building Standards Code, otherwise known as the CALGreen Code. According to Section A4.602 of Appendix A4 of the CALGreen Code, CALGreen's otherwise voluntary Tier 1 standards call for a 15 percent improvement in energy requirements and cool/solar-reflective roofs, as well as other stipulations indirectly related to energy efficiency, including stricter water conservation, 65 percent diversion of construction and demolition waste, 10 percent recycled content in building materials, 20 percent permeable paving, and 20 percent cement reduction. Additionally, the proposed project would be subject to Davis Municipal Code Sections 8.01.060, 8.01.100, and 8.01.110 and all applicable CAAP measures related to energy demand.

[3] City of Davis. *Climate Action and Adaptation Plan*. April 18, 2023.

Response to Comment 9-4

The project site is not located with a transit priority area (TPA) as defined by Public Resources Code (PRC) Section 21099, CEQA Guidelines Section 15064.3, and PRC Section 21064.3. The proposed project would not be considered infill development and is not characterized as such in the EIR. The references to infill development within the EIR noted by the commenter are intended to be general references to provide an explanation of SB 743 and the transition from LOS to VMT. For instance, on page 4.6-1 of the EIR, the reference to infill development reads as follows, "the State's requirement to transition from LOS to VMT is aimed at promoting infill development, public health through active transportation, and a reduction in greenhouse gas (GHG) emissions."

Response to Comment 9-5

The City of Davis does not have adopted regulations that would require the currently proposed project to include Class IV bikeways. Thus, notwithstanding the City's self-proclaimed status as a "U.S. leading bicycle town," inclusion of Class IV bikeways are not necessary for the purposes of the project ensuring consistency with the City's policies addressing bicycle facilities. The comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-6

The Draft SEIR specifically mentions "bicycle/scooter sharing" under the Emerging Transportation Technology and Travel Options heading on page 4.6-8. Thus, bicycles are included in the discussion. While the Draft SEIR does not specifically mention electric-assist bicycles (ebikes), inclusion of ebikes in the discussion of emerging technologies would not affect the analyses and conclusions in the Draft EIR pertinent to the currently proposed project's potential to conflict with City programs, plans, ordinances, or policies that address the circulation system, including roadway, bicycle, and pedestrian facilities. Furthermore, the Draft SEIR clearly explains that transportation and mobility are being transformed through a number of forces, which include new technologies, and whether stated explicitly, can be understood to also imply those technologies which are not specifically identified in the Transportation chapter. Based on the above, the Emerging Transportation Technology and Travel Options discussion in the Transportation chapter of the Draft SEIR is adequate.

Response to Comment 9-7

The Emerging Transportation Technology and Travel Options discussion in the Draft SEIR is specifically focused on how emerging technology and travel trends, including use of ridesharing apps, are increasing the uncertainty in forecasting future travel conditions. The Draft SEIR does not draw conclusions regarding the use of such methods, as the discussion is included for informational purposes.

Response to Comment 9-8

The Emerging Transportation Technology and Travel Options discussion in the Draft SEIR is specifically focused on how emerging technology and travel trends, including use of automated vehicles (AVs), are increasing the uncertainty in forecasting future travel conditions. The Draft SEIR does not draw conclusions regarding the use of such methods or provide that such methods have been proven to be safe. Based on the above, the Emerging Transportation Technology and Travel Options discussion in the Transportation chapter of the Draft SEIR is adequate.

Response to Comment 9-9

The comment does not address the adequacy of the Draft SEIR. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-10

The comment does not address the adequacy of the Draft SEIR. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-11

Changes to adopted General Plan policies are a matter for the Davis City Council. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-12

Please see Response to Comment 9-11.

Response to Comment 9-13

This comment does not address the adequacy of the Draft SEIR and has been noted for the record. Refer to Figure 4.6-2 on page 4.6-6 of the Draft SEIR for an illustration of existing bicycle facilities within the project vicinity and Impact 4.6-2, which starts on page 4.6-27, for a discussion of project impacts and mitigation measures associated with bicycle facilities.

Response to Comment 9-14

On a per swimmer basis, swimmers whose travel mode is pick-up/drop-off would generate double the number of vehicle trips compared to swimmers whose travel mode is drive and park. A swimmer whose travel mode is drive and park would generate two vehicle trips (one inbound trip at the start of the lesson and one outbound trip at the end of the lesson). A swimmer whose travel mode is pick-up/drop-off would generate four vehicle trips (one inbound and one outbound trip at the start of the lesson and one inbound and one outbound trip at the end of the lesson). The foregoing travel characteristics are captured in the project trip generation estimates presented on pages 4.6-20 through 4.6-24 of the Draft SEIR.

Refer to Impact 4.6-4, which starts on page 4.6-32 of the Draft SEIR, for a discussion of project impacts and mitigation measures associated with VMT. The project's non-residential component, including the USA Pentathlon Training Facility and pool complex, would result in a less-than-significant impact related to VMT (although the project's overall VMT impact would be significant due to the project residential component). Thus, the Draft SEIR does not identify mitigation measures for the project's non-residential component to reduce associated vehicle travel.

The final question included in the comment does not address the adequacy of the Draft SEIR. The question has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-15

The Draft SEIR's statement that "the project could increase the number and severity of bicycle-vehicle conflicts and increase the potential for collisions involving bicyclists" is due to conditions specifically identified at the East Covell Boulevard/Monarch Lane intersection and on internal roadways between East Covell Boulevard and the proposed project's non-residential uses, as described on pages 4.6-27 through 4.6-29 of the Draft SEIR. The foregoing conditions are addressed by Mitigation Measures SEIR 4.6-2(a) and SEIR 4.6-2(b). The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-16

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Response to Comment 9-17

The comment incorrectly compares two separate metrics – project-generated vehicle trips and total VMT in the SACOG region. Project-generated vehicle trips are the total number of vehicle trips that start or end within a project site. Project-generated vehicle trips is a key input used to estimate project-generated VMT, which is the total distance traveled by all vehicle trips that start or end within a project site. As such, project-generated VMT represents the amount of driving activity generated by a project.

Total VMT is the total distance traveled by all vehicle trips within a given geographic area (in the case of the currently proposed project and the Draft SEIR, the SACOG region). Total VMT includes both project-related trips and all background trips generated by other uses. The metric not only captures new vehicle travel activity generated by a project, but also a re-allocation of existing vehicle travel activity that is influenced by the implementation of the project. As such, total VMT represents the project's effects on the amount of driving in the SACOG region.

For projects that improve destination proximity, such as the proposed project's non-residential component, it is common for VMT analysis results to indicate an increase in project-generated VMT and a decrease in total VMT that occurs within a geographic boundary.

Response to Comment 9-18

The Draft SEIR's VMT analysis does not make any assumptions regarding exactly who would live at the proposed project in the future or their commuting patterns, as doing so would be speculative. The Draft SEIR's VMT analysis utilizes the SACOG SACSIM19 travel demand model. SACSIM19 is a sophisticated activity-based model that simulates the typical weekday travel activity of individual people in the six-county SACOG region, including the City of Davis. SACSIM19 utilizes a variety of transportation system, socioeconomic, land use, and travel behavior inputs to simulate individual travel tours, which can, in turn, be used to produce VMT and other transportation performance metrics. Refer to SACOG's June 2020 User Guide and Model Documentation for SACSIM19 for additional information.[4]

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 9-19

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Response to Comment 9-20

The VMT-reduction estimate associated with CAPCOA Handbook Strategy T-23 (Community-Based Travel Planning) was calculated using the formula provided in the CAPCOA Handbook. Because 100 percent of project residents would be eligible for this strategy, the strategy would achieve the strategy's maximum potential VMT reduction of 2.3 percent. The comment does not

[4] Sacramento Area Council of Governments. *User Guide and Model Documentation for SACSIM19*. Available at: https://www.sacog.org/home/showpublisheddocument/1510/638355527088370000. Accessed October 2024.

provide evidence as to why the referenced VMT-reduction estimate is inadequate, but has, nonetheless, been noted for the record.

Response to Comment 9-21

Please see Response to Comment 9-20. In addition, while there are other CAPCOA measures that were considered, they were either further limited in their effectiveness or infeasible. For example, with respect to reducing project-generated residential VMT per capita, a challenge inherent to the project site is its location on the periphery of Davis and its relative lack of nearby destinations. Because the currently proposed project cannot be moved to a more location-efficient site from a VMT perspective, potential VMT-reduction strategies considered for the Draft SEIR were focused on modifications to the project site plan, vehicle-trip-reduction programs/policies, and increasing the number and quality of travel options serving the project site.

Beyond those identified in Mitigation Measure SEIR 4.6-4, which starts on page 4.6-34 of the Draft SEIR, several other VMT-reduction strategies were considered during the preparation of the Draft SEIR but dismissed because they were determined to be infeasible by the City and the project applicant. Such strategies include those that would yield considerably greater VMT reduction, such as CAPCOA Handbook Strategy T-3 (Provide Transit-Oriented Development, up to 31 percent VMT reduction) and CAPCOA Handbook Strategy T-1 (Increase Residential Density, up to 30 percent VMT reduction). Strategy T-3 would require the provision of a "high frequency transit station" near the project site, which is defined as a stop/station served by either rail or bus rapid transit with headways less than 15 minutes. Achieving the CAPCOA definition for a high-frequency transit station would be infeasible for the proposed project, given the considerable financial resource requirements needed and the uncertainty surrounding whether such a service could be provided, as it would require actions by Unitrans, Yolobus, or other transit operators. Strategy T-1 was not ultimately included in Mitigation Measure SEIR 4.6-4; however, see the Increased Density Alternative in the Alternatives Analysis chapter of the Draft SEIR and the Master Response for additional information regarding VMT reductions that would be achieved by increased residential densities.

Furthermore, because a significant and unavoidable impact related to project-generated VMT has been identified in the Draft SEIR, the City of Davis, should it decide to approve the currently proposed project, would be required to adopt a Statement of Overriding Considerations. In accordance with CEQA Guidelines Section 15093, the City would be required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the currently proposed project against its unavoidable environmental risks. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the proposed project outweigh the unavoidable adverse environmental effects, the City would consider the adverse environmental effects acceptable as part of its adoption of a Statement of Overriding Considerations.

Response to Comment 9-22

The currently proposed project would include a new shared-use path connection and EVA route between the Merens Street/Silesian Street and Caravaggio Drive/Bonnard Street intersections, which would enable bicycle, pedestrian, and emergency vehicle access between the project site and the existing Wildhorse neighborhood.

Letter 10

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September 23, 2024

Eric Lee, Senior Planner
City of Davis, Department of Community Development and Sustainability
23 Russell Boulevard, Suite 2
Davis, California 95616
elee@cityofdavis.org

Re: Palomino Place Project Draft Subsequent Environmental Impact Report (SCH# 2007072020)

Dear Mr. Lee:

10-1

As you are aware, Taylor, Wiley & Keasling represents Palomino Place, LLC, the applicant for the Palomino Place Project ("Project"). We have reviewed the Draft Subsequent Environmental Impact Report ("DSEIR") for the Project.

Based on our review of the DSEIR, we believe that the DSEIR is a thorough and complete document that complies with the California Environmental Quality Act ("CEQA") by identifying all of the significant environmental effects of the Project and feasible mitigation measures to reduce those impacts. While we concur with the conclusions of the DSEIR, we would like to offer our comments below with respect to the Project's transportation impacts. The purpose of this letter is not to call into question the adequacy of the analysis nor the conclusions of the DSEIR, but rather to further the informational purposes of CEQA by elaborating on a few of the identified Project impacts and suggesting refinement to one mitigation measure.

I. Utilization of a DSEIR

The DSEIR is a statutorily authorized form of CEQA analysis which may be utilized when an EIR has already been prepared and certified for a project site but substantial changes are proposed within the project or substantial changes have occurred with respect to the circumstances under which the project is being taken thereby necessitating additional analysis and major revisions. (Public Resource Code §21166.) The DSEIR compares the proposed project to the previously analyzed project and identifies any new or increased environmental impacts and proposes new and revised mitigation measures. The Palomino Place Project is being compared to the prior

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Wildhorse Rand Project, which was also a residential subdivision at this location but Palomino Place contains fewer residential units.[1]

Given the reduction in the number of units, most people would intuitively assume the Project would have fewer significant impacts. Nevertheless, the DSEIR identifies six significant and unavoidable environmental impacts associated with the Project, more than were identified for Wildhorse Ranch. They are:

10-1 Cont.

- Impact 4.1-2 – aesthetics impacts related to change in visual character
- Impact 4.1-4 – cumulative impacts related to change in visual character
- Impact 4.4-1 – construction noise impacts
- Impact 4.6-4 – vehicle miles traveled (VMT) impacts
- Impact 4.7.2 – agriculture impacts
- Impact 4.7.7 – land use and planning impacts

It warrants noting, however, that four of the six impacts are primarily due to the fact that the Project is being processed pursuant to the "Builder's Remedy" section of the California Housing Accountability Act ("HAA") and do not physically differ from the previously identified impacts in any substantive way. (Cal. Government Code §65589.5(d).) The other two identified impacts (construction noise and VMT) would be comparable to what would occur with the previously approved Wildhorse Ranch Project, but have been identified as significant and unavoidable due to changes in CEQA impact analysis methodology that occurred after the publication of the 2009 EIR. Therefore, while the DSEIR analysis may appear to indicate that the environmental impacts of Palomino Place are worse than the previously approved Wildhorse Ranch Project, we believe that the impacts would be equivalent to or improved in all cases.

II. Impacts Associated with Vehicle Miles Travelled

- Impact 4.6-4 – vehicle miles traveled (VMT) impacts

10-2

One of the key changes in CEQA methodology since publication of the 2009 EIR is the shift to VMT. The impact to VMT was not addressed in the 2009 Wildhorse Ranch EIR because the requirement to analyze VMT was not added to CEQA until Senate Bill (SB) 743 became effective in 2020. We can confidently assume that the Wildhorse Ranch Project would have exceeded the VMT threshold of significance as would likely any predominantly single-family residential subdivision in Davis. The DSEIR identified a significant and unavoidable impact associated with the Project's potential inconsistency with the vehicle VMT guidance provided in CEQA Guidelines § 15064.3(b).

We do not contest this finding of significance for the Project. However, as discussed in the attached VMT Assessment Memorandum from transportation consultant Kimley-Horn, we believe that the VMT-related level of significance for the Project (and, really, any new subdivision in Davis) is magnified as a result of the impact that students

[1] Wildhorse Ranch contained 191 residential units – 16 more than the Project – comprised of 73 detached single-family residences, 78 townhome units, and 40 attached affordable housing units.

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have on the City's per capita VMT. As the analysis indicates, once students are removed from the per capita threshold, the VMT impact of the Project is considerably reduced.

10-2 Cont.

Additionally, and a point that we find compelling, is Kimley-Horn's findings pertaining to in-bound commutes. This is a reality that many of us are familiar with but which may not be fully captured in VMT analysis. As has been discussed at the Planning Commission and Council several times, there are numerous people who work, shop, go to DJUSD schools, and participate in Davis youth athletics that are commuting into Davis from surrounding communities nearly every day. Many of these families would choose to live in Davis but have been unable to buy a home in Davis due to a very constrained market of new single-family homes. This is an important segment of the population that needs to be accommodated with housing. In the City's most recent regional housing needs allocation (RHNA), Davis was allocated 805 housing units to accommodate above moderate income households. As such, single-family for sale housing made up nearly 40% of the total units that need to be constructed in Davis by 2029 to meet the RHNA obligation. Kimley-Horn opines that, in meeting this obligation by adding to housing supply and particularly by building the Project, Davis could actually help to reduce regional VMT.

III. **East Covell Blvd and Monarch Lane Intersection (MM 4.6-2(b))**

10-3

Consistent with CEQA regulations, the DSEIR does not evaluate traffic level of service for purposes of evaluating transportation impacts associated with the Project. However, LOS was evaluated in a Transportation Impact Study (TIS) and Local Transportation Analysis (LTA) which served to inform the CEQA analysis in other ways including bicycle and pedestrian safety. Of note, the DSEIR relied on the TIS and LTA to conclude that mitigation in the way of significant intersection improvements at East Covell Boulevard and Monarch Lane is necessary prior to occupancy of residential units, the commencement of operations at the aquatics complex, or prior to the commencement of operations at the USA Pentathlon Training Facility (whichever is first). It is our contention that this mitigation measure may need to be refined to, at a minimum, reconsider the timing of the improvements.

To elaborate, similar to VMT, the Applicant engaged Kimley-Horn to peer reviewed the TIS and LTA and the conclusions drawn therefrom. As you will see in the attached Traffic Peer Review Memorandum, Kimley-Horn finds that the need for a new traffic signal at the intersection is questionable. Footnote 5 on page 4.6-31 seems to concur that further monitoring of the intersection and analysis of the full set of warrants should be evaluated prior to making the decision to install the new signal. Furthermore, noting the off-grade bike/ped crossing of East Covell that would be connected to the Pentathlon Facility, the peer review contemplates that bicycle and pedestrian conflicts may be mitigated in other more cost-effective ways. As such, we suggest that the trigger for this mitigation measure be modified to a date after there is more analysis and certainly not prior to occupancy of residential units.

In conclusion, while we have no concerns regarding the adequacy of the EIR under CEQA, we believe the decisionmakers and the public should be made aware of our

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10-3 Cont.

comments regarding the VMT-related supplemental memorandum as we believe it hits on a point that has been part of the larger community dialogue regarding the interplay between a need for housing and VMT. We additionally ask for reconsideration on MM 4.6-2(b) with respect to its necessity and timing and that the City consider whether there may be alternative mitigation that is more feasible.

Please let us know if you have any questions regarding our comments on the DSEIR.

Sincerely,

Matthew S. Keasling

Enclosures

cc: Mayor and City Council
J. David Taormino

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Cont.

Kimley»Horn

Memorandum

To: David Taormino
Palomino Place, LLC

From: Stephen Dillon, PE
Matt Weir, PE, TE, PTOE, RSP$_1$

Re: ***Palomino Place***
Traffic Peer Review

Date: September 23, 2024

The purpose of this memorandum is to summarize findings from a transportation planning peer review of technical work completed, by others, for the Palomino Place development project proposed to be located on the north side of East Covell Boulevard in Davis, California (the "proposed project" or "project"). The project proposes a mixture of residential and recreational land uses, including an aquatic complex and pentathlon training facility. This peer review memorandum documents professional opinions on the *Transportation Impact Study*[1] *(TIS)* and *Local Transportation Analysis*[2] *(LTA)* recently completed and provided by the City of Davis.

The following conclusions were reached after reviewing the aforementioned project documents:

10-4

- The significance of the project's impact on local pedestrian and cyclist safety may be overstated due to existing infrastructure proximate to the project.
- The project should not bear the full responsibility to signalize the East Covell Boulevard and Monarch Lane intersection based on the analysis results and justification provided.

Local Transportation Analysis (LTA) Review

Operational Assessment

The LTA incorporates the same project trip generation characteristics as documented to complete the TIS. The LTA used the City's Travel Demand Model (TDM) to establish the anticipated distribution of project trips. Project trips were subsequently assigned to relevant movements across the LTA study facilities. Existing baseline traffic conditions were established using data collected in October 2023 and February 2024, when local schools were in session. Existing data, including field observations, were used to calibrate a SimTraffic microsimulation model of the study facilities. This calibrated model was subsequently used to analyze Existing plus Project conditions at the study facilities.

A summary of the study facilities' operations is provided in Table 3 of the LTA. Of the 52 study facilities evaluated, the LTA identifies one study facility (Intersection 42, County Road 102 at County Road 29) as operating below acceptable standards per Yolo County thresholds, with the addition of the project. The LTA proposes converting the intersection from side-street stop control (SSSC) to all-way stop control (AWSC) and identifies that this improvement will allow the intersection to operate acceptably with the addition of the project. This improvement is deemed to be the sole responsibility of the project.

[1] *Palomino Place – Transportation Impact Study*, Fehr & Peers, July 2024.
[2] *Palomino Place – Local Transportation Analysis*, Fehr & Peers, August 2024.

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Cont.

Kimley»Horn

The LTA approach outlined above is consistent with industry standards, the state of the practice, and accepted methodologies. As such, the delay, level-of-service, and queueing results presented in the LTA are presumed to be comprehensive and appropriate.

East Covell Boulevard/Monarch Lane Intersection (Intersection 26)
Beginning on LTA Page 36, a standalone section is devoted to discussing Intersection 26 (East Covell Boulevard at Monarch Lane). The project proposes to construct a fourth leg of the existing intersection, a new eastbound left-turn pocket, and a new westbound right-turn pocket. All project vehicular traffic (both ingress and egress) will use this access point. A summary of the intersection's analysis results is provided in Table 6 of the LTA.

10-4 Cont.

Both the existing and proposed intersection configurations were assessed in the LTA as side-street stop control (SSSC). The LTA concludes that the intersection operates at an acceptable level during the weekday AM and PM peak-hours with the addition of the project per City of Davis standards.

The LTA assumes a queue storage distance of 105-feet for the eastbound left-turn movement and a queue storage distance of 100-feet for the westbound right-turn movement. The LTA concludes that 95th-percentile queues under Existing plus Project conditions for these movements will be contained within the assumed storage lengths for each movement. It is important to note that, according to the technical analysis worksheets, the maximum reported 95th-percentile queue for the eastbound left-turn movement is 75-feet, 30-feet shorter than the storage provided (105-feet as noted above). Existing unsignalized median left-turn pocket storage lengths measured along East Covell Boulevard between Alhambra Drive and Pole Line Road range between 90 and 105-feet. There are no existing instances of dedicated right-turn pockets along East Covell Boulevard within the same area.

The LTA documents that the study intersection would satisfy the Four-Hour Vehicular Volume signal warrant (CA MUTCD Warrant 2) and the Peak-Hour signal warrant (CA MUTCD Warrant 3B) under Existing plus Project conditions. The LTA does not provide supporting documentation or data for the CA MUTCD Warrant 2 conclusion. The LTA does provide technical worksheet outputs for CA MUTCD Warrant 3B in the Technical Appendix. The LTA uses Figure 4C-4 to evaluate CA MUTCD Warrant 3B. Per the CA MUTCD:

10-5

> *"If the posted statutory speed limit or the 85th-percentile speed on the major street* [East Covell Boulevard] *exceeds 40 mph, or if the intersection lies within the built-up area of an isolated community having a population of less than 10,000, Figure 4C-4 may be used in place of Figure 4C-3 to evaluate the criteria in the second category of the Standard* [Warrant 3B]*."*

Page 18 of the LTA establishes that East Covell Boulevard has a posted speed limit of 40 mph. The LTA does not provide supporting documentation or data identifying the 85th-percentile speed as greater than 40 mph. As such, it is concluded that Figure 4C-3 would have been appropriate to assess CA MUTCD Warrant 3B (rather than Figure 4C-4). Additional review of the technical output sheets provided for the Warrant 3B evaluation reveals discrepancies between the Existing and Existing plus Project traffic volumes at Intersection 26. Volumes used for the Warrant 3B evaluation are shown to be higher than those presented in Figure 1 (Existing) and Figure 2 (Existing plus Project, assumed to be misnumbered as Figure 1 is repeated). Reevaluating the assessment using Figure 4C-3 and the appropriate volumes reveals that Intersection 26 satisfies Warrant 3B under Existing plus Project conditions during the PM peak-hour only, with the highest minor street approach volume of 102 vehicles exceeding the threshold of 100 vehicles by two vehicles.

The operations, queueing, and signal warrant outputs provided in the LTA are not conclusive in establishing that signal control is necessary at the East Covell Boulevard and Monarch Lane intersection.

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Cont.

Kimley»Horn

Please note that the CA MUTCD presents the following guidance on the application of Warrant 3:

10-5 Cont.

> *"This signal warrant shall be applied only in unusual cases, such as office complexes, manufacturing plants, industrial complexes, or high-occupancy vehicle facilities that attract or discharge large numbers of vehicles over a short time."*

Furthermore, the CA MUTCD provides the following guidance on justifications for traffic control signals:

10-6

> *"On local streets and highways, the engineering study should include consideration of a roundabout (yield control). If a roundabout is determined to provide a viable and practical solution, it should be studied in lieu of, or in addition to a traffic control signal."*

The section concludes stating that "the lack of adequate bicycle and pedestrian crossing amenities across Covell Boulevard at Monarch Lane would result in the project causing adverse effects on bicycle and pedestrian travel and safety, as described in Impact 2 of the Palomino Place Transportation Impact Study[1] [TIS]." Existing pedestrian/cyclist crossings of East Covell Boulevard are available via an undercrossing approximately 700-feet to the east and via a signalized crosswalk approximately 900-feet to the west of Intersection 26.

Recommendations

10-7

The LTA concludes with a section documenting recommendations for the project to implement due to documented effects on the roadway network. One of the recommendations (as discussed above) is related to operations at Intersection 42 (County Road 102 at County Road 29). The other recommendation, consistent with Impact 2 outlined in the TIS[1], is to install a traffic signal with designated bicycle and pedestrian facilities and crossings at Intersection 26 (East Covell Boulevard at Monarch Lane/Project Access). The section presents and documents the operations of two separate phasing plans, Plan A and Plan B, with results for each plan presented in Table 7 and Table 8 of the LTA, respectively. The highest reported 95th percentile queue for the eastbound left-turn movements is 100-feet for both Plan A (Table 7) and Plan B (Table 8), which is higher than the highest documented 95th percentile queue of 75-feet for the same movement under unsignalized conditions as reported in Table 6 of the LTA.

TIS - Impact 2

TIS Impact 2 assesses impacts to bicycle and pedestrian facilities. The TIS identifies two existing East Covell Boulevard crossings proximate to the project site: one is at a signalized intersection approximately 900-feet to the west, the other is a grade-separate undercrossing approximately 700-feet to the east. The TIS concludes that, based on the project's land uses (namely its inclusion of an aquatic center) and its location within the City (proximate to existing residential developments), the project can be anticipated to generate new pedestrian and cycling trips. This finding is consistent with the methodology presented in Table 6 of the TIS, which shows reductions for "Internal Trip Capture and External Walk, Bike, and Transit". The TIS anticipates 58 people using these alternative modes over the course of the day.

The TIS presents the following example of potential aquatic center users:

> *"For example, residents of the Slide Hill Park neighborhood located south of East Covell Boulevard would desire to travel to uses on the project site and, given the relatively short trip distance, could choose to walk or ride a bicycle to fulfill this trip. However, the East Covell Boulevard/Monarch Lane intersection, which is situated along the bicycle and pedestrian desire line between the project site and the Slide Hill Park neighborhood, currently lacks bicycle and pedestrian crossings and the project would not include the provision of such crossing facilities. Bicyclists who desire to cross East Covell Boulevard at Monarch Lane would be required to cross multiple lanes of uncontrolled vehicular traffic with a posted speed limit of 40 mph, experiencing considerable*

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exposure to conflicting vehicular traffic. Given these conditions, as well as project-related increases to vehicular traffic within the project site vicinity, the project could increase the number and severity of bicycle-vehicle conflicts and increase the potential for collisions involving bicyclists."

10-7 Cont. The TIS subsequently proposes Mitigation 2.2 to improve the identified impact.

TIS – Mitigation 2.2

To alleviate the perceived impact to pedestrians and cyclists, the TIS identifies installation of a traffic signal at the East Covell Boulevard intersection with Monarch Lane as an appropriate mitigation. The TIS states that the purpose of the signal is not for operations, but rather to "provide temporal separation" between different roadway users.

10-8 The mitigation states that the eastbound left-turn pocket should be constructed with a storage length of 175-feet. As mentioned in the "East Covell Boulevard/Monarch Lane Intersection (Intersection 26)" discussion of this review memorandum, this turn pocket length would be significantly longer than existing median turn pocket storage lengths along the East Covell Boulevard corridor, and longer than the documented 95th-percentile queuing anticipated to be realized at this movement.

The mitigation section reiterates that the intersection would meet both CA MUTCD Warrant 2 and Warrant 3B for signal control. These conclusions are also found in the LTA and have been discussed in the "East Covell Boulevard/Monarch Lane Intersection (Intersection 26)" discussion of this review memorandum.

Conclusions

10-9 Cont. The methodology used in the LTA to evaluate the anticipated traffic operations considering the addition of the project is generally consistent with accepted methodologies in the practice. The LTA documents one operational deficiency at a study facility (Intersection 42, County Road 102 at County Road 29) and suggests a feasible improvement to alleviate the deficiency.

The LTA documents that the proposed project access intersection (Intersection 26, East Covell Boulevard at Monarch Lane) operates at acceptable delay/LOS per City of Davis standards, both with and without the addition of the project, using side-street stop control (SSSC) which is consistent with the existing intersection control. The LTA documents that the longest 95th-percentile vehicle queues at the eastbound left-turn movement would be contained within a 105-foot storage length turn pocket, which would be generally consistent with other unsignalized median turn lanes found along the proximate East Covell Boulevard corridor. The LTA documents, with some inaccuracies, that Intersection 26 satisfies the CA MUTCD Warrant 3B during the PM peak-hour with the addition of the project. The LTA concludes that, consistent with Impact 2 outlined in the TIS[1], the project should install signal control at Intersection 26 with appropriate pedestrian/cyclist crossings under the premise that it is necessary to improve pedestrian and cyclist safety.

10-10 Impact 2 from the TIS states that, due to the project's inclusion of an aquatic center and its proximity to residential developments, the project can be anticipated to generate new pedestrian and cycling trips. The TIS asserts that the project would create new cyclist and pedestrian desire lines and subsequently presents a hypothetical scenario of users from the Slide Hill Park neighborhood, which is located directly across East Covell Boulevard from the project site, attempting to access the project. In this scenario, it is asserted that cyclists from Slide Hill Park "…would be required to cross multiple lanes of uncontrolled vehicular traffic with a posted speed limit of 40 mph, experiencing considerable exposure to conflicting vehicular traffic." It is also worth noting that cyclists/pedestrians from Slide Hill Park would not "be

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10-10 Cont.

required" to cross multiple lanes of traffic to access the project as there is a grade-separated undercrossing (previously identified within the Impact 2 section of the TIS) approximately 700-feet east of the intersection. However, the TIS concludes that this crossing, and the signalized crossing approximately 900-feet west of the intersection, would require "substantial out of direction travel". It is worth noting that the Slide Hill Park neighborhood may lack direct cyclist and pedestrian crossings to the proposed project site, but it does not lack its own pool (Manor Pool).

10-11

The TIS proposes Mitigation 2.2 to alleviate the perceived impact to pedestrians and cyclists. Mitigation 2.2 involves installation of traffic signal control with pedestrian and cyclist crossings at the East Covell Boulevard/Monarch Lane intersection to "provide temporal separation" between roadway users. Mitigation 2.2 further identifies construction of an eastbound left-turn pocket with a 175-foot storage length, which is approximately 100-feet longer than the highest 95th-percentile queue length documented for this movement with the addition of the project in the LTA.

Given the locations and types of existing crossings along East Covell Boulevard, it is reasonable to conclude that Slide Hill Park may be the only neighborhood in the City plausibly considered to be inconvenienced by the lack of controlled pedestrian/cyclist crossings directly at the East Covell Boulevard and Monarch Lane/Project Access intersection. However, their inconvenience is lessened by the existing pool (Manor Pool) within the Slide Hill Park neighborhood. As such, it is reasonable to conclude that Impact 2 should be considered a less than significant impact. While City pedestrians, City cyclists, and the project access may benefit from a traffic signal at this intersection via Mitigation 2.2, the project should not bear full responsibility for its design and construction based on the information provided in the LTA and TIS.

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Cont.

Kimley»Horn

Memorandum

To: Matt Keasling
Taylor, Wiley and Keasling

From: Chris Gregerson, P.E., T.E., AICP
Michael Schmitt, AICP CTP, PTP, RSP_1
Atticus Washington, EIT

Re: **Vehicle Miles Traveled (VMT) Assessment**
Palomino Place Project

Date: September 23, 2024

This memorandum analyzes the potential vehicle miles traveled (VMT) impact on for the Palomino Place Project ("Project" or "proposed Project") located in the City of Davis, California. Specifically, this memorandum evaluates the effect that student housing has on the City's VMT per capita. It also analyzes the commute patterns of workers and residents of the City of Davis.

Summary

Based on evaluation completed using the transportation analytics platform, Replica, Kimley-Horn finds that:

10-12

1. University students commonly have a travel profile that is different from typical residents. When UC Davis student trips are removed from the VMT per capita calculation, the residential VMT threshold for Davis is approximately by 8.5-percent higher. When applying the 8.5-percent difference to the finding that the proposed Project is 22.5-percent higher than the calculated threshold, the proposed Project is found to have a VMT per capita close to the citywide average.
2. For every 1 resident leaving Davis to work, approximately 2 non-Davis residents are coming to work in Davis. For employees within the City of Davis, 64-percent are estimated to commute into Davis. This would suggest a strong demand for local housing. Based on a review of the data, it is estimated that 82-percent of workers commuting into Davis have incomes higher than the median Davis income, which tends to suggest a robust demand for a broad range of housing types within Davis, including single-family homes. Meeting this demand could significantly reduce commute VMT.

Vehicle Miles Traveled Analysis

When comparing the proposed Project's VMT efficiency to the City of Davis's average VMT efficiency, it is important to consider the influence of the UC Davis student population. Given the unique trip making nature of the UC Davis residents (primarily to and from campus), a student household possess a significantly different trip profile as compared to typical residential conditions. For this reason, and to offer a more complete comparison between the proposed Project's residential component and the City of Davis, an analysis was conducted in which UC Davis student residential trips were excluded from the calculation for the citywide average VMT. This analysis was completed using Replica which is an online transportation analytics platform that provides a variety of metrics regarding travel data. These metrics include trip origins, destinations, and mode of travel (among others) based on a variety of data sources including anonymized cell phone location data, Census data, fleet GPS data, and others. The Replica data was used as the primary tool for identifying the UC Davis resident trips, exclude the student trips, and

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determine the VMT impact of the proposed Project on the surrounding roadway network compared to a citywide threshold calculated with and without student trips.

To calculate the citywide average VMT per capita, the total sum of all distances traveled by residents living within the City of Davis using private automobiles and ride services (taxi/Uber/Lyft) was divided by the amount of unique trip takers. The same calculation was performed for residents of the proposed Project's surrounding neighborhood, under the assumption that the neighborhoods west of the Project site could serve as a proxy for the proposed Project's trip making characteristics. This analysis is summarized in Table 1.

Table 1 – Residential Vehicle Miles Traveled (VMT) per Capita*

Scenario	Residential VMT per capita (All Residents)	Residential VMT per capita (Excludes UC Davis Students)	Difference
Palomino Project	33.85	34.56	0.98
City of Davis Average	28.33	31.17	2.84
(% City of Davis Average)	+19.49%	+10.88%	-8.61%

*Assuming total unique trip takers as a representative estimate for population

10-12 Cont.

As shown in Table 1, the total residential VMT per capita is 19.49-percent higher for the proposed Project compared to the City of Davis average. By excluding the trips made by UC Davis students, the proposed Project's VMT per capita reduces to 10.88-percent above than the City of Davis average, a reduction of 8.61-percent. This shows that removing student trips from the VMT per capita provides a better comparison of VMT efficiency for residential projects given the approximately 9-percent difference that students have on the overall citywide average. Thus, when this difference is applied to the findings in the Project's SEIR, the Project can reasonably be assumed to be about 13.5-percent above the City's threshold for residential developments rather than the 22.5-percent shown in the SEIR.

Household Needs Analysis

Replica was also used to further analyze the trips into the City of Davis from residents living outside of the City and compare them to the trips made by Davis residents. The analysis focused on commute trips, school trips, and recreational trips. The commute trip analysis determined that for employees within the City of Davis, 64-percent are estimated to commute into Davis. In addition, for every one employee leaving Davis to work, approximately two are coming to work from areas outside of Davis. This would suggest a strong demand for local housing.

The household income of commuters into Davis was analyzed as a proxy for housing needed within the City for Davis workers who are not Davis residents. It was determined that 18-percent of commuters into Davis have a household income at or below the Davis median household income ($57,700), 35-percent of commuters into Davis have a household income between the 60th and 80th percentile for Davis household income ($81,100 - $154,500) and 35-percent of commuters into Davis have a household income above the 80th percentile for Davis household income. This distribution of household incomes shows that there is a need for housing within the City of Davis for a variety of household incomes.

The need for student housing was also found during the trip analysis. It was found that approximately 33-percent of all trips to Davis for school (all grade levels and University) were made by non-Davis residents.

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Assuming a large majority of trips for K-12 students would occur within Davis as non-Davis residents generally would not travel outside of the school district of their residence, it can be presumed that non-Davis residents traveling into Davis for school are University students that live outside the City of Davis. Therefore, one can reasonably conclude that if students are living outside of the City and traveling to the University for school, there remains a need for student housing within the City of Davis.

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Findings

The key findings of this analysis include:

- As shown in **Table 1**, the total residential VMT per capita is 19.49-percent higher for the proposed Project compared to the City of Davis average with UC Davis students included and 10.88-percent higher for the proposed Project compared to the City of Davis average without the UC Davis students excluded, a difference of 8.61-percent.
- If UC Davis students were removed from the City of Davis threshold for residential developments, the Project's VMT per capita would continue to exceed the significance threshold. However, the reduction compared to a threshold calculated with student trips included demonstrates that the student population trip making characteristics are not representative of typical residential conditions. Therefore, the results suggest that the proposed Project's impact is closer to 16.0-percent over the significance threshold, rather than the 22.5-percent value calculated with UC Davis student result. Further, when the Project's residential component is compared to the City's baseline average, previously calculated to be 9.7-percent above the City's baseline average, without the impact of the UC Davis students the proposed Project's VMT per capita would be approximately 1-percent above the City's baseline average.
- While the VMT impacts of the Project are significant and unavoidable, the impact of not providing this type of housing in Davis could exacerbate regional VMT by continuing to constrain housing opportunities given that for employees within the City of Davis, 64-percent are estimated to commute into Davis. In addition, for every one employee leaving Davis to work, approximately two are coming to work from areas outside of Davis. This would suggest a strong demand for local housing.
- The distribution of household incomes for commuters into Davis shows that there is a need for housing within the City of Davis for a variety of household incomes given that 70-percent of commuters have a household income of at least the 60th percentile of the City of Davis's household income and 18-percent of commuters have a household income at or below the Davis median household income ($57,700).
- There remains a need for student housing within the City of Davis because approximately 33-percent of all trips to Davis for school (all grade levels and University) were made by non-Davis residents. Assuming a large majority of trips for K-12 students would occur within Davis as non-Davis residents generally would not travel outside of the school district of their residence, it can be presumed that non-Davis residents traveling into Davis for school are University students that live outside the City of Davis.

Attachments:

Exhibit 1 – Cabrillo College Student Residential Locations
Exhibit 2 – Auto Commute Trips to Davis by Origin Census Tract

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Palomino Place Project - Vehicle Miles Traveled (VMT) Assessment

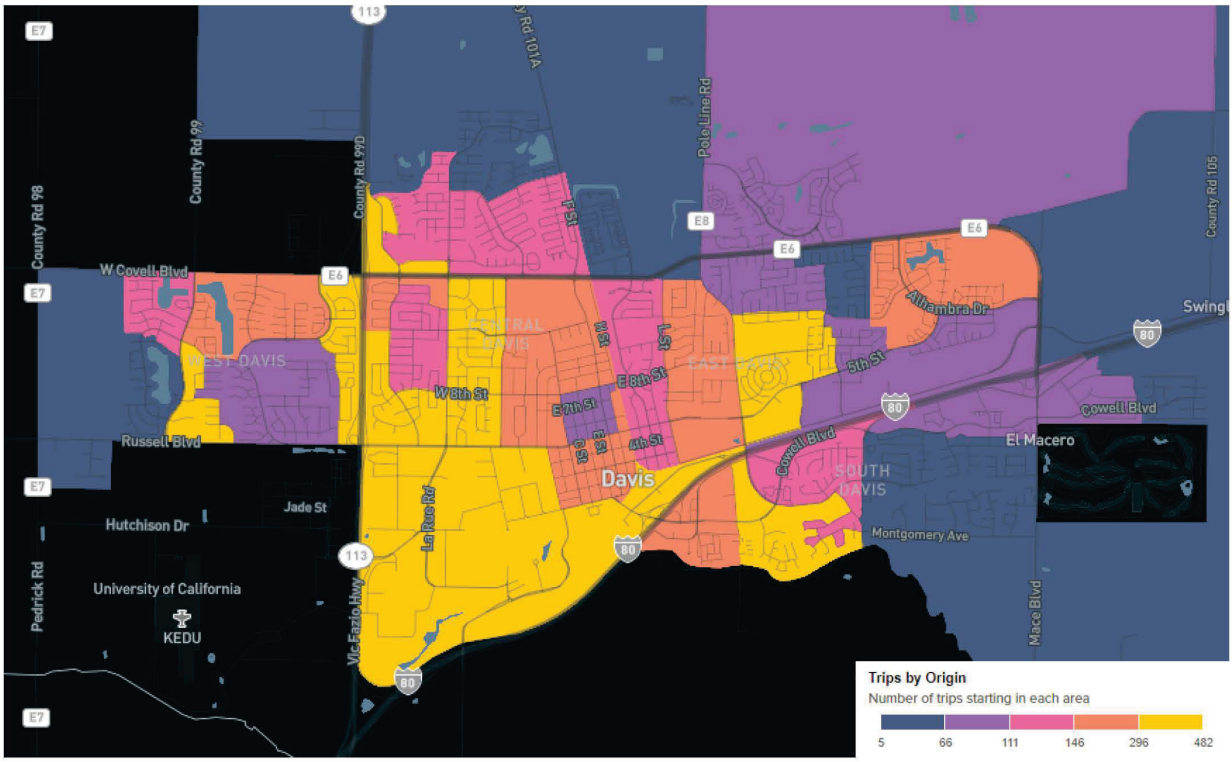

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Exhibit 1
UC Davis Student Residential Locations

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Palomino Place Project - Vehicle Miles Traveled (VMT) Assessment

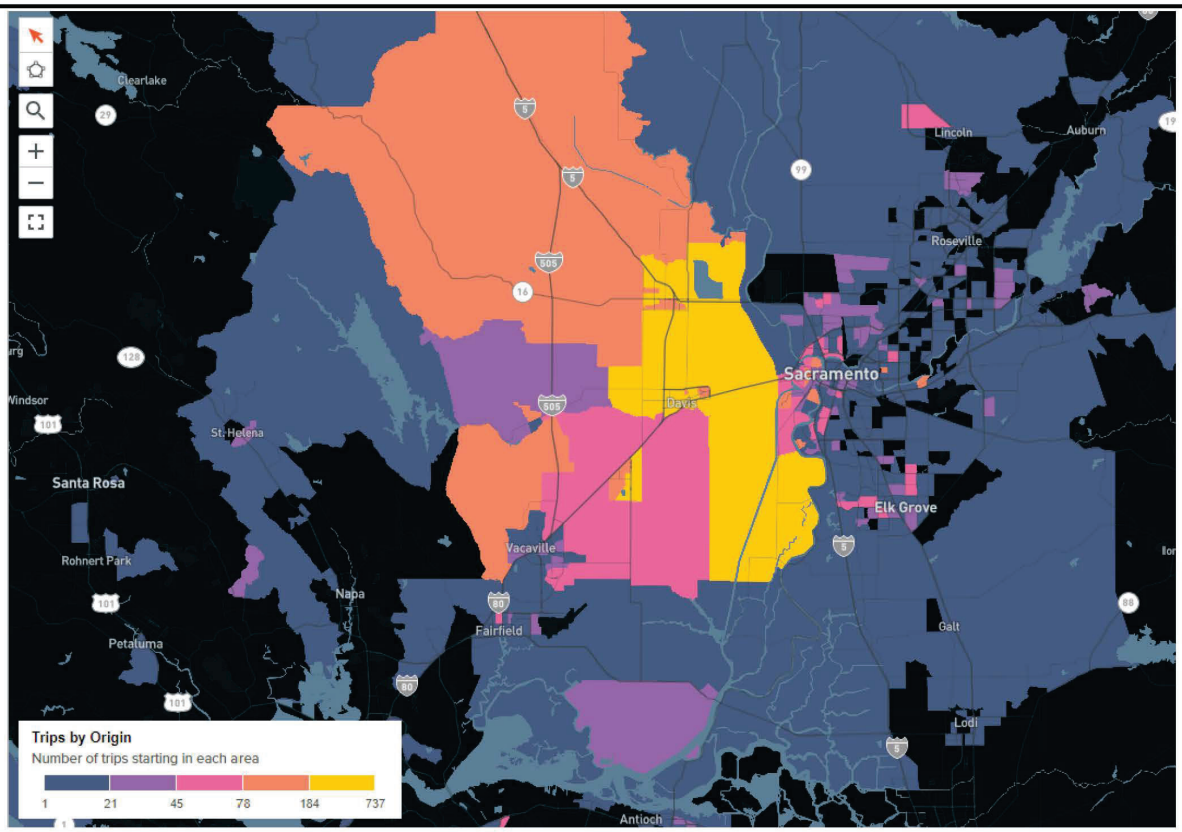

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Exhibit 2
Auto Commute Trips to Davis by Origin Census Tract

LETTER 10: TAYLOR, WILEY & KEASLING

Response to Comment 10-1
The comment's concurrence with the conclusions of the Draft SEIR and observations on the impact analyses contained in Chapter 4.6, Transportation, is noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 10-2
Please see Response to Comment 10-12 below.

Response to Comment 10-3
Please see Responses to Comments 10-4 through 10-10 below.

Response to Comment 10-4
The comment summarizes the LTA prepared by Fehr & Peers and does not address the adequacy of the Draft SEIR.

Response to Comment 10-5
The comment and this response pertain to the LTA prepared by Fehr & Peers to address the currently proposed project's consistency with the City's General Plan LOS policies. The LTA is a non-CEQA document. Therefore, the comment and this response do not address the adequacy of the Draft SEIR. However, information regarding signal warrants is referenced in the Draft SEIR and included in this response for informational purposes and for consideration by the decision-makers. This response provides additional information to demonstrate the need for a traffic signal at the East Covell Boulevard/Monarch Lane intersection based on signal warrants established by the California Department of Transportation's (Caltrans) California Manual on Uniform Traffic Control Devices (CA MUTCD). In short, the intersection does not meet either CA MUTCD Warrant 2 or Warrant 3 under existing conditions. However, development of the currently proposed project would cause the intersection to meet both CA MUTCD Warrant 2 and Warrant 3 under Existing Plus Project conditions. As such, the LTA recommends that the currently proposed project install a traffic signal at the East Covell Boulevard/Monarch Lane intersection.

CA MUTCD Chapter 4C (Traffic Control Signal Needs Studies) provides standards and guidance regarding signal warrants and associated analysis methods used to identify the need for the installation of a traffic signal. For the purposes of the LTA, the signal warrant analysis for the East Covell Boulevard/Monarch Lane intersection includes the following attributes:

- CA MUTCD Factors For Justifying Traffic Signals: The CA MUTCD states that investigation of the need for a traffic-control signal must include an engineering study that analyzes nine signal warrants that address a range of factors from safety to operations. However, the LTA is a planning study intended to evaluate the effects of the proposed project on traffic operations and to determine the project's consistency with the City's General Plan LOS policy. Therefore, for the purposes of the LTA, the signal warrant analysis includes Warrant 2 and Warrant 3 only and does not include all nine CA MUTCD signal warrants. This analysis approach is customary for City of Davis traffic operations analysis studies, whereby a more limited set of signal warrant analyses are conducted to inform planning-level decisions. As described in the CA MUTCD and Footnote No. 5 of

the Draft SEIR, additional data collection and analysis should be conducted as part of an engineering study to inform the ultimate design and implementation of the traffic signal.

- Applicability of Warrant 2 and Warrant 3: Warrant 2 conditions are intended to be applied where the volume of intersecting traffic is the principal reason to consider installing a traffic-control signal. Warrant 2 is directly applicable to the currently proposed project, because the project would construct a new north leg at the East Covell Boulevard/Monarch Lane intersection, which would introduce new conflicting vehicle movements and increase the volume of intersecting traffic at the intersection. Warrant 3 conditions are intended to be applied only in unusual cases, such as office complexes, manufacturing plants, industrial complexes, or high-occupancy vehicle facilities that attract or discharge large numbers of vehicles over a short time. Warrant 3 is somewhat applicable to the proposed project, as the USA Pentathlon Training Facility and pool complex would generate relatively high levels of vehicle traffic at the intersection during the class transition times, although traffic levels would be less than those generated by the larger employment uses described in the CA MUTCD Warrant 3 definition. Analysis results for both Warrant 2 and Warrant 3 are provided for the purposes of the LTA and this response.
- Applicable Speed Limit: The CA MUTCD allows for the use of different Warrant 2 and Warrant 3 thresholds based on the statutory speed limit or the 85th percentile speed on the major street. For Warrant 2, the CA MUTCD states that, "[i]f the posted or statutory speed limit or the 85th-percentile speed on the major street exceeds 40 [miles per hour (mph)], or if the intersection lies within the built-up area of an isolated community having a population of less than 10,000, Figure 4C-2 may be used in place of Figure 4C-1." For Warrant 3, the CA MUTCD states that, "[i]f the posted or statutory speed limit or the 85th-percentile speed on the major street exceeds 40 mph, or if the intersection lies within the built-up area of an isolated community having a population of less than 10,000, Figure 4C-4 may be used in place of Figure 4C-3 to evaluate the criteria in the second category of the Standard." This is an important distinction, as the warrant thresholds are lower for major streets where speeds exceed 40 mph.

  The LTA notes that the posted speed limit on East Covell Boulevard near Monarch Lane is 40 mph. However, speed surveys conducted by the City of Davis on July 16, 2021 indicate that the critical speed (i.e., 85th percentile speed) is 47 mph on the segment of East Covell Boulevard between Wright Boulevard and Alhambra Drive. When available, utilization of speed survey data is preferred rather than posted speed limits, as the speed survey data better captures the actual travel behavior of road users and its effects on roadway operations and safety. Therefore, Figures 4C-2 and 4C-4 are appropriate to use for Warrant 2 and Warrant 3, respectively.
- Number of Approach Lanes: The warrant analysis evaluates the major street (East Covell Boulevard) with two lanes and the minor street (Monarch Lane) with two lanes. For existing conditions, the northbound Monarch Lane approach does not have lane markings that indicate the number of travel lanes. However, field observations indicate that existing road users form two separate queues on the northbound approach – one for shared through left-turn movements and one for right-turn movements – which results in two de facto lanes. Moreover, traffic volume data indicates that northbound approach volumes are split relatively evenly between the two movements. Therefore, consideration of the minor street approach on northbound Monarch Lane as a two-lane approach is appropriate for the purposes of the existing conditions signal warrant analysis. It should be noted that the Warrant 3 technical worksheet for existing conditions incorrectly evaluates this minor street approach as a one-lane approach. This error has been corrected in the final version

of the LTA and in the analysis results presented in this response. For Existing Plus Project conditions, the minor street approach on southbound Monarch Lane is evaluated as a two-lane approach, consistent with the roadway cross-section provided in the project circulation diagram.

- Allocation of Turning Movement Volumes: The CA MUTCD states that "at an intersection with a high volume of left-turn traffic from the major street, the signal warrant analysis may be performed in a manner that considers the higher volume of the major-street left-turn volumes plus the higher volume minor-street approach as the 'minor street' volume and both approaches of the major street minus the higher of the major-street left-turn volume as 'major street' volume." This approach was utilized for the existing and Existing Plus Project signal warrant analyses given the estimated left-turn volumes at the intersection.
- Traffic Volume Estimates: Hourly intersection turning movement volumes for existing and Existing Plus Project conditions were derived consistent with the data collection and analysis methods described in the LTA.

The results of the Warrant 2 and Warrant 3 analyses for existing and Existing Plus Project conditions are presented in Table 2-3. Technical calculations and supporting data have been incorporated into the LTA technical appendix.

Table 2-3
East Covell Boulevard/Monarch Lane Intersection – Traffic Signal Warrant Analysis Results

Analysis Scenario	Signal Warrant Met?				
		Warrant 3			
		AM Peak Hour		PM Peak Hour	
	Warrant 2	Warrant 3a	Warrant 3b	Warrant 3a	Warrant 3b
Existing	Not Met	Not Met	Not Met	Not Met	Not Met
Existing Plus Project	Met	Not Met	Met	Not Met	Met

Source: Fehr & Peers, 2024.

As shown in Table 2-3, either Warrant 2 or Warrant 3 are met under existing conditions. The currently proposed project would cause both Warrant 2 and Warrant 3 to be met under Existing Plus Project conditions. Therefore, the LTA recommendation that the project install a traffic signal at the East Covell Boulevard/Monarch Lane intersection is appropriate. The traffic signal is needed in order to accommodate the increase in volume of intersecting traffic at the intersection that would result from the proposed project.

Response to Comment 10-6

A roundabout was considered as a potential East Covell Boulevard/Monarch Lane intersection improvement recommendation in the LTA. However, implementation of a roundabout was determined in be infeasible and impractical due to the lack of available ROW for the roundabout footprint, the associated physical impacts on existing adjacent properties, the deleterious effects on bicycle and pedestrian crossing safety (due to the anticipated need for uncontrolled multi-lane crossings of East Covell Boulevard), and the close proximity to the signalized intersection at the East Covell Boulevard/Wright Boulevard intersection.

Response to Comment 10-7

In general, the comment summarizes the LTA and does not address the adequacy of the Draft SEIR.

Response to Comment 10-8

The comment incorrectly states that Mitigation Measure 2.2 of the TIS prepared for the proposed project incorporated into Draft SEIR as Mitigation Measure 4.6-2[b]) recommends that the eastbound left-turn pocket at the East Covell Boulevard/Monarch Lane intersection be constructed with a storage length of 175 feet. The referenced mitigation measure recommends that the eastbound left-turn pocket be constructed with a storage length of 105 feet, which would be generally consistent with existing median turn pocket storage lengths along the East Covell Boulevard corridor and would sufficiently accommodate the 95th percentile queue for such movements (estimated at 100 feet with the installation of a traffic signal under Existing Plus Project conditions).

Response to Comment 10-9

Please see Response to Comment 10-5.

Response to Comment 10-10

The comment quotes text from Impact 2 of the TIS (which is incorporated into Impact 4.6-2 of the Draft SEIR, which starts on page 4.6-27) but excludes key contextual information provided in the full text from the TIS. The full text from the TIS clearly states that the referenced adverse condition would be specific to project-generated bicyclists who desire to cross East Covell Boulevard at Monarch Lane (emphasis added):

> **Bicyclists who desire to cross East Covell Boulevard at Monarch Lane** would be required to cross multiple lanes of uncontrolled vehicular traffic with a posted speed limit of 40 mph, experiencing considerable exposure to conflicting vehicular traffic. (TIS, page 52)

The City acknowledges that project-generated bicyclists would be able to choose from a variety of route options, not just crossing East Covell Boulevard at the Monarch Lane intersection, to travel between the project site and nearby neighborhoods and destinations. As noted in the comment, the existing grade-separated undercrossing of East Covell Boulevard located approximately 700 feet east of Monarch Lane would be available to project-generated bicyclists who desire to travel south towards Slide Hill Park and east towards Mace Ranch and Harper Junior High School. However, as described in the TIS and Draft SEIR, use of the grade-separated undercrossing would introduce additional out-of-direction travel and travel time relative to crossing at-grade at the East Covell Boulevard/Monarch Lane intersection. This condition is illustrated in Figure 2-2 below.

For travel towards Slide Hill Park (Route A), use of the undercrossing would increase travel distances by approximately 1,400 feet (over 0.25-mile) relative to use of the at-grade crossing at the East Covell Boulevard/Monarch Lane intersection. For travel towards Mace Ranch and Harper Junior High School (Route B), use of the undercrossing would increase travel distances by approximately 750 feet (over 0.125-mile) relative to use of the at-grade crossing at the East Covell Boulevard/Monarch Lane intersection. It should be noted that the foregoing estimates do not account for the additional effects of the slope/grade change of the undercrossing route on bicyclist route choices.

Figure 2-2
Increased Travel Distances to East Covell Boulevard Undercrossing

Bicyclist route choices would be influenced by a variety of factors, including, but not limited to, route travel times/distances, route slopes/grade changes, bicyclist experience levels, and bicyclist preferences related to travel times, comfort, and perceived safety. Accordingly, for travel south or east of the project site, use of the at-grade crossing at the East Covell Boulevard/Monarch Lane intersection, instead of the undercrossing, would be anticipated for project-generated bicyclists who prioritize minimizing travel distance over other factors. Hence, the TIS' and Draft SEIR's conclusions regarding the anticipated level of bicycle activity at the East Covell Boulevard/Monarch Lane intersection and the associated project significant impact determination are appropriate.

With respect to the portion of the comment that addresses Manor Pool at Slide Hill Park, it should be noted that the project applicant has indicated that the pool complex would be available to pentathletes, as well as local swim organizations, and would include privately operated community programming for all ages, including youth groups, senior-focused groups, and recreational and competitive swimming programs. As such, future project residents who desire to access public swimming pools would likely need to travel off-site to do so. Manor Pool at Slide Hill Park is one of two public swimming pools in the City of Davis (the other being Arroyo Pool in West Davis) and, thus, would be anticipated to attract project residents for public recreational swimming activities. Many project residents would likely choose to walk or bike to Manor Pool, given the close proximity of Manor Pool to the project site and the shortest path of travel includes crossing East Covell Boulevard at Monarch Lane.

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 10-11

Please see Response to Comment 10-10 and the discussion under Impact 4.6-2 of the Draft SEIR, which starts on page 4.6-27, for a discussion of project-generated bicyclist route options and associated project impacts at the East Covell Boulevard/Monarch Lane intersection.

Additionally, the comment minimizes the adverse effects of the proposed project on bicycle and pedestrian facilities and the project's inconsistency with City of Davis policies that promote active transportation and transportation system safety. Furthermore, the comment incorrectly asserts that TIS Impact 2 (Impact 4.6-2 of the Draft SEIR) should be a less-than-significant impact based on the standards of significance relevant to the Draft SEIR's Transportation chapter. Importantly, note that the segment of Monarch Lane immediately south of East Covell Boulevard is part of the City's High Injury Network (HIN), as identified in the City of Davis' Local Road Safety Plan (LRSP), which underscores the need for careful consideration when planning for changes to multimodal travel patterns and their associated effects on roadway operations and safety.

Regarding the need for and timing of the installation of a traffic signal at the East Covell Boulevard/Monarch Lane intersection, an existing deficiency does not exist at the intersection related to either bicycle/pedestrian impacts or traffic signal warrants. Existing bicycle and pedestrian crossing demand at the intersection does not currently exist, given the lack of trip generators on the north side of the intersection. Therefore, a need for a traffic signal to manage bicycle and pedestrian crossing activity across East Covell Boulevard at Monarch Lane does not occur under existing conditions. The proposed project would create this need, given the new project-generated bicycle and pedestrian crossing demand at the intersection. Further, the intersection does not currently meet CA MUTCD Warrant 2 or Warrant 3 (see Response to Comment 10-5). However, the proposed project would cause the intersection to meet both Warrant 2 and Warrant 3 under Existing Plus Project conditions and create the need for the installation of a traffic signal for traffic signal warrant purposes. However, recognizing that the need for the signal by the project's residential units is not immediately required, the timing for installation of the signal relative to the residential units will be clarified in SEIR Mitigation Measure 4.6-2(b), as shown below:

> *SEIR 4.6-2(b) Prior to ~~occupancy of the~~ issuance of building permit for the 75th market-rate residential unit~~s~~ at the project site, the commencement of operations at the aquatic complex, or the commencement of operations at the USA Pentathlon Training Facility (whichever occurs first), the project applicant shall install a traffic signal at the East Covell Boulevard/Monarch Lane intersection. The purpose of the traffic signal is to provide temporal separation between bicyclists, pedestrians, and conflicting vehicular movements (e.g., through the provision of pedestrian crossing phases). As part of this mitigation measure, the applicant shall also construct an eastbound left-turn pocket with a queue storage length of 105 feet and install designated bicycle and pedestrian facilities and crossings.*
>
> *The specific intersection geometrics, lane configurations, bicycle and pedestrian accommodations, and signal phasing are subject to review and approval by the City of Davis City Engineer.*

> *Note that this intersection would meet the four-hour vehicular volume signal warrant (CA MUTCD Warrant 2) and the peak hour signal warrant (CA MUTCD Warrant 3B) under Existing Plus Project conditions.*
>
> *Implementation of these improvements, or a set of improvements of equal effectiveness as determined by the City of Davis City Engineer, would reduce the potential for conflicts involving bicyclists or pedestrians that could otherwise be caused by the project and promote bicycle and pedestrian travel to and from the project site.*

The above changes to the timing of the mitigation measure have been determined acceptable by the City of Davis and the potential impact would still be fully mitigated.

Response to Comment 10-12

The VMT information presented in the comment contains the following flaws that raise questions regarding the suitability of its use for CEQA review:

- Replica transportation analytics data is derived from user-defined inputs, such as analysis zones, date ranges, and time periods. The extent to which the referenced VMT information is a representative sample of travel activity in Davis cannot be ascertained, because the comment does not provide details regarding the foregoing inputs. For instance, the referenced VMT information has not been confirmed to represent travel activity during the community's unique school months when both local schools and UC Davis are in regular session. Further, the referenced VMT information has not been confirmed to represent post-pandemic travel activity after UC Davis returned to in-person instruction and after major local employers (UC Davis, the State of California, etc.) issued return-to-office and/or hybrid work policies.
- Replica transportation analytics data is derived from a travel demand model that utilized a variety of inputs described in the comment. Best practices for CEQA transportation analysis require use of travel demand models that have been calibrated and validated to local conditions. Calibration/validation information is not provided in the comment, so ascertaining whether the referenced VMT information is representative of local travel conditions is not possible.
- The Replica platform is a travel demand model that represents existing travel conditions only. Therefore, the platform cannot be used to forecast future changes to land use patterns or the transportation system. The ability to modify travel demand models to account for changes to land use patterns and the transportation system, such as those associated with the proposed project, is necessary for CEQA review and associated VMT impact analysis.
- The comment excludes VMT associated with UC Davis students in a manner that is inconsistent with the VMT analysis methods and standards of significance in the Draft SEIR. The Draft SEIR's VMT analysis methods and standards of significance require a full accounting of existing City of Davis residential VMT per capita associated with all City residents from which to compare project-generated residential VMT per capita. The Draft SEIR does not provide provisions for excluding select population segments from the VMT impact analysis as suggested by the comment.

While the referenced VMT information may be of interest for informational purposes, the information is not appropriate for the purposes of CEQA review or VMT impact analysis based on the information provided above and based on the requirements/guidance set forth in the CEQA Guidelines, the Governor's Office of Planning and Research (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), and the City's VMT analysis methods and standards of significance.

It should also be noted that the Draft SEIR's VMT analysis uses the SACOG SACSIM19 travel demand model. SACSIM19 is a sophisticated activity-based model that simulates the typical weekday travel activity of individual people in the six-county SACOG region, including the City of Davis. SACSIM19 uses a variety of transportation system, socioeconomic, land use, and travel behavior inputs to simulate individual travel tours, which can, in turn, be used to produce VMT and other transportation performance metrics. Please refer to SACOG's June 2020 User Guide and Model Documentation for SACSIM19 for additional information.[5]

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

[5] Sacramento Area Council of Governments. *User Guide and Model Documentation for SACSIM19*. Available at: https://www.sacog.org/home/showpublisheddocument/1510/638355527088370000. Accessed October 2024.

Letter 11

September 22, 2024

Eric Lee, Senior Planner
City of Davis Department of Community Development
23 Russell Boulevard, Suite 2
Davis, CA 95616
elee@cityofdavis.org

Re: Comments on the Draft SEIR for the Palomino Place Project

Dear Mr. Lee:

11-1

The Draft Subsequent EIR (SEIR) the City has prepared for the Palomino Place Project is incomplete in multiple ways:

- The SEIR needs to be revised with GHG and VMT analyses that are transparent, explained, genuine, and supported by evidence that is included in the SEIR.
- The GHG impact analysis needs to be based on thresholds of significance that are supported by substantial evidence.
- The GHG and VMT analyses need to include a genuine comparison of the impacts of the Wildhorse Ranch development that was evaluated in 2009 and the now proposed Palomino Place Project.
- There is additional feasible mitigation that should be included in the SEIR for mitigating the project's VMT impact.
- Because the project would result in a significant VMT impact, it would also result in a significant GHG impact, given that improvements to VMT efficiency is a critical component of both CARB's 2022 Scoping Plan and the City's 2023 Climate Action and Adaptation Plan.
- There is more feasible mitigation the applicant can implement to address the project's significant GHG impact.

Overall, the City and its consultants need to prepare a higher quality impact analysis that fully discloses the VMT and GHG impacts and includes all feasible mitigation to reduce these impacts.

More detailed comments are provided under the headings below.

The Project Description is Incomplete

11-2

Comment 1. The SEIR does not adequately explain the locations of the different proposed housing types on the project site. It is unclear where the 40 attached affordable housing units would be located. This is not shown in Figure 3-2, Figure 3-3, Figure 3-4 or any other part the SEIR. This detail is important because the probability of residents using transit or bicycles for travel is very much determined by the location of their dwelling units relative to transit stops and bike paths. This information should be provided so that readers can comment on the adequacy of the SEIR,

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11-2 Cont.

including the adequacy of the transportation impact analysis in Section 4.6, and the adequacy of the air quality, GHG, and energy impact analyses in Section 4.2.

The Approach to Analysis of Construction-related GHGs is Disingenuous

Comment 2. The approach used in the SEIR to analyze GHG emissions associated with project construction is inconsistent with the approach used to analyze the GHG emissions associated with operation of the project. For construction, the analysis compares the project's construction-related GHGs to a mass emission threshold of 1,100 MTCO2e/year, whereas, for project operations, the analysis compares the project's operational GHGs to the operational GHGs of the Baseline Scenario.

Because the analyses are part of an SEIR, as explained on page 4.2-40, the environmental baseline for this CEQA analysis is the level of impact determined for a similar project in the 2009 EIR for the Wildhorse Ranch Project. The SEIR further explains:

> In order to maintain the emissions reductions trajectory anticipated by the CAAP and mandated by the City's climate emergency declaration, the proposed project would be required to demonstrate that operations on the site would not exceed the previously anticipated emissions levels associated with the Wildhorse Ranch Project (i.e., baseline conditions [and referred to as the Baseline Scenario]). Should the proposed project result in increased on-site operational emissions relative to baseline conditions, the project would be responsible for reducing operational emissions to a level equal to baseline conditions (i.e., no net increase as compared to baseline conditions). By ensuring that emissions from the proposed project remain at or below baseline conditions, the project would provide a proportionate share of emissions reductions and would not inhibit attainment of citywide net carbon neutrality by the year 2040, nor would the project conflict with the City's CAAP.

11-3

This same approach should be used to evaluate the construction-related GHGs of the Proposed Project.

Values reported on pdf sheet 12 of Appendix C show that construction of the Baseline Scenario would generate 402 MTCO2e in 2026, 527 MTCO2e in 2027, 232 MTC02e in 2028, and 0 MTCO2e in 2029—amounting to a total of 1,191 MTCO2e over the entire construction period.

Values reported on pdf sheet 110 of Appendix C show that project's construction would generate 758 MTCO2e in 2026, 457 MTCO2e in 2027, 507 MTC02e in 2028, and 466 MTCO2e in 2029—amounting to a total of 2,188 MTCO2e over the entire construction period.

Thus, construction of the Proposed Project would generate 84 percent more GHGs than construction under the Baseline Scenario. This means that the construction-related GHG impact under the Proposed Project would be substantially more severe than under the Baseline Scenario.

Comment 3. All feasible mitigation should be implemented to reduce the impact of the Proposed Project's construction-related GHGs to a less-than-significant level. The applicable measures for reducing construction-related GHG emissions in CAPCOA's *Handbook* should be considered. (California Air Pollution Control Officers Association. 2021. Handbook for Analyzing Greenhouse

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11-4 Cont.

Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, pages 361–374. Available: https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft_2021-Aug.pdf. Accessed September 13, 2024).

Addition measures for reducing GHGs during the construction phase include the following:

1. Require construction contractors and subcontractors to only use renewable diesel fuel in all diesel-powered equipment used during construction.
2. Use low or zero-emission vehicles, including construction vehicles. This measure is identical to the measure required by Mitigation Measure 4.10-1 of the 2009 Wildhorse Ranch EIR (Table 4.10-6 on page 4.10-21).
3. Implement a program that incentivizes construction workers to carpool, use EVs, or use public transit to commute to and from the construction site. At a minimum, the program shall include a virtual or real "ride board" for workers to organize carpools and reimburse workers for any expenses they incur from using local public transit to commute to and from the construction site. The program may also include the following features:
    a. Provide preferential parking to carpool vehicles, and vanpool vehicles driven by construction workers; and
    b. Schedule work shifts of construction workers to be compatible with the schedules of local transit services.

   Implementation of these measures shall be required in the contract the project applicant establishes with its construction contractors.
4. Purchase and retire carbon offsets from one of the CARB-approved voluntary markets to offset all remaining construction-related GHGs.

The Mass Emission Threshold for Construction-related GHGs is Unsubstantiated

Comment 4. The analysis of construction-related GHGs under Impact 4.2-7 applies SMAQMD's threshold of 1,100 MTCO2e/year. This threshold is inappropriate for the current project as it is both out of date (it does not reflect the state's current goals of climate neutrality) and the use of this threshold for the specific conditions in Davis is not supported by substantial evidence.

11-5

SMAQMD first developed this threshold based on a screening analysis in which it examined 102 EIRs and MNDs for projects in Sacramento County between 2014 and 2018. SMAQMD's screening analysis determined that a threshold of 1,100 MTCO2e/year would capture 98 percent of operational GHG emissions associated with new land use development in Sacramento County. SMAQMD decided to recommend the same criterion to evaluate GHG emissions generated by project construction (SMAQMD 2020. *Greenhouse Gas Thresholds for Sacramento County*, page 39. Available: https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf. Accessed September 12, 2024). And SMAQMD's development of this threshold was based on a public input process that included input from the cities and counties in its jurisdiction, SMUD, and the Environmental Council of Sacramento.

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Comment 5. Also, SMAQMD developed its thresholds of significance before the State Legislature passed AB 1279, which established a statewide policy for California to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net-negative emissions thereafter (as noted on page 4.2-22 of the SEIR). This means the SMAQMD's threshold was developed before the state's mandate of carbon neutrality. When SMAQMD first developed its threshold of 1,100 MTCO2e/year, it "sought to capture only those projects that are necessary to meet AB 32 goals." (SMAQMD. 2014. *Justification for Greenhouse Gas Emissions Thresholds of Significance*, page 10. Available as part of the SMAQMD Board of Directors Meeting Agenda for October 23, 2014. Available: https://www.airquality.org/meetings/board-of-directors/board-of-directors-meetings. Accessed September 15, 2024.)

11-6

The SEIR, YSAQMD, the City of Davis, and its consultant have not provided evidence that the mass emission threshold SMAQMD developed for Sacramento County can also be used for projects in Yolo County or the City of Davis. When SMAQMD developed its threshold, it did not examine data from development in Davis or other parts of YSAQMD's jurisdiction and it did not collect public input from entities in Davis or other parts of YSAQMD's jurisdiction. The GHG emissions inventory in Sacramento County is substantially different than the GHG inventory in Davis, as are the types of land use development, jobs–housing balance, and VMT efficiency. Without supporting evidence, SMAQMD's threshold of 1,100 MTCO2e/year should not be used to evaluate projects in Davis. Just because YSAQMD says it is okay does make it a defensible threshold. The analysis shall apply a threshold that is supported with substantial evidence, and if necessary, the City should develop a threshold based on substantial evidence. If the City or YSAQMD indeed recommends the use of 1,100 MTCO2e/year as a threshold for analyzing projects in Davis, the SEIR should supply supporting evidence. If there is no substantial evidence for using 1,100 MTCO2e/year as a threshold for analyzing construction-related GHG emissions for a project in Davis, a revised impact analysis should be provided that applies a threshold that is based on substantial evidence. One such threshold would be 0 MTCO2e. Another approach would be to qualitatively determine whether the construction activity would implement specific best management practices that are consistent with CARB's 2022 Scoping Plan (e.g., only using certified renewable diesel fuel in all diesel-powered equipment used during construction).

SMAQMD 1,100 MTCO2e/year Threshold is Not Applied Meaningfully

Comment 6. Even if 1,100 MTCO2e/year were a legitimate threshold to evaluate construction-related GHGs for projects in Davis, the SEIR incorrectly interprets this criterion as being 1,100 MTCO2e *during any calendar year*. Instead, the analysis should evaluate whether project construction would possibly generate 1,100 MTCO2e *during any 12-month period*. Values reported on pdf sheet 110 of Appendix C show that project construction would generate 758 MTCO2e in 2026, 457 MTCO2e in 2027, 507 MTC02e in 2028, and 466 MTCO2e in 2029 with a start date of April 1, 2026. But whether the project would exceed 1,100 MTCO2e *during any 12-month period* would depend on how quickly construction is performed, the number of days per week construction work takes place, and whether any phases of construction would overlap (e.g., paving, architectural coatings, structure building). Even if substantial evidence supports the use of 1,100 MTCO2e/year

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as a significance threshold, the analysis should be revised to inform the reader about whether this mass emission level could be exceeded *during any 12-month period*.

The Operational GHG Emissions is Not Explained and Lacks Transparency

11-8

Comment 7. The analysis of operational GHGs under Impact 4.2-7 concludes that the project's GHG would not result in a significant impact because, in part, the annual mass of GHGs generated by the proposed project would be less than the annual mass of GHGs generated by the Baseline Scenario (i.e., operation of the Wildhorse Ranch project, which was analyzed in an EIR in 2009). The quantitative analysis is summarized in Table 4.2-12 on page 4.2-63. Table 4.2-12 summarizes the operational emissions estimated for both the Baseline Scenario and the Proposed Project. This quantitative comparison is flawed in three ways.

First and foremost, this quantitative analysis lacks transparency. Table 4.2-12 shows that mobile-source GHG emissions for the Baseline Scenario (3,362 MTCO2e/year) would be substantially greater than for the Proposed Project (2,081 MTCO2e/year)— 38 percent greater. This percent difference is much bigger than that of other emission sectors shown in Table 4.2-12, including area sources, energy consumption, water consumption, solid waste, and refrigerants. No explanation is provided.

Appendix C reveals the following:

11-9

- The Baseline Scenario would have 191 dwelling units with an estimated population of 529 residents that generate 891,275 vehicle trips per year 8,953,737 VMT per year. These values are found on pdf sheets 10 and 89 of Appendix C.
- The Proposed Project would have 175 dwelling units with an estimated population of 458 residents that generate 456,251 vehicle trips per year 5,675,659 VMT per year. These values are found on pdf sheets 107 and 200 of Appendix C.

Based on these values, the Proposed Project would have 9 percent fewer residential units, 9 percent fewer residents, generate 95 percent fewer trips and 58 percent less VMT, and 38 percent less mobile-source GHGs than the Baseline Scenario. This is peculiar and suggests that the GHG comparison in Table 4.2-12 is not straightforward or incorrect. The SEIR provides no narrative about these values.

The trip rates and trip distances used in the analysis are not provided in Section 4.2, Air Quality, GHG Emissions, and Energy; the CalEEMod Results in Appendix C; Section 4.6, Transportation; or the Transportation Impact Study in Appendix H. Nonetheless, these values can be computed as follows using the abovementioned values from Appendix C.

11-10

- The Baseline Scenario would generate 4,666 vehicle trips per dwelling unit annually, 1,685 vehicle trips per resident annually, with an average trip length of 10.05 miles per trip.
- The Proposed Project would generate 2,607 vehicle trips per dwelling unit annually, 941 vehicle trips per resident annually, with an average trip length of 12.44 miles per trip.

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11-10 Cont. Why would the trip rates for the Proposed Project so much lower than for the Baseline Scenario, especially given that the Proposed Project would include a USA Pentathlon Training Facility that would attract trips from throughout the region, state, and beyond?

11-11 Why would the trip length for the Proposed Project be so much higher than for the Baseline Scenario?

11-12 How are the Pentathlon facility and Aquatic Complex accounted for in the analysis of the Proposed Project?

11-13 These questions need to be answered in the SEIR. And the values used to override default values in CalEEMod need to be shown and explained in the SEIR or in Appendix C.

11-14 Were the trip rates and trip lengths used to evaluate residential land uses under the Proposed Project and Baseline Scenario developed using the same methodology and sources? The Transportation Impact Study in Appendix H includes no discussion about the trip generation rates and trip distances used to evaluate the Baseline Scenario but does do so for the Proposed Project.

11-15 Members of our community deserve to have this information when evaluating the adequacy of the SEIR, and the merits of the project. The information provided in the current SEIR is inadequate and, therefore, the conclusion that the Proposed Project would generate less GHG emissions than the Baseline Scenario lacks substantial evidence.

11-16 Comment 8. Second, different calendar years were used in the estimate of operational GHGs for the Baseline Scenario and the Proposed Project. Operational GHGs for the Baseline Scenario were estimated for calendar year 2028, as shown on pdf sheet 9 of Appendix C. Operational GHGs for the Proposed Project were estimated for calendar year 2029, as shown on pdf sheet 107 of Appendix C. This discrepancy is important because CalEEMod uses different emission factors for different calendar years and, more specifically, the emission factors used by CalEEMod for mobile sources are lower for later calendar years than earlier calendar years. While the difference in emission estimates for mobile sources in 2028 vs. 2029 is unlikely to be substantially different, it is nonetheless necessary to compare the Baseline Scenario and Proposed Project using the same calendar year.

11-17 Comment 9. Third, it would be more useful to compare the GHG efficiency of the Proposed Project to that of Baseline Scenario rather than compare the mass emission levels of each scenario. It would be more meaningful to compare the MTCO2e per resident of the Baseline Scenario to that of the Proposed Project. This would enable the reader to evaluate whether the Proposed Project would be a GHG-efficient land use development. Please revise Table 4.2-12 to show such a comparison.

GHG-emitting Construction Activity would Conflict with the Scoping Plan

11-18 Comment 10. The SEIR contains no analysis about whether construction of the Proposed Project would be consistent with CARB's 2022 Scoping Plan. In Table 2-1 on page 77 of its 2022 Scoping Plan, CARB indicates the need to stop using fossil fuels to power construction equipment. The Proposed Project would not incorporate any measures consistent with this goal and therefore

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11-18 Cont.

project-related construction activity would not be consistent with the Scoping Plan. This should be part of the qualitative analysis on page 4.2-35 of the SEIR about the CEQA Checklist question that asks whether the project would "conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs."

The Projects Operational VMT would Conflict with the Scoping Plan and the Davis Climate Action and Adaptation Plan

11-19

Comment 11. In the VMT analysis under Impact 4.6-4, the SEIR concludes that the Proposed Project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) because the VMT efficiency of the residential component of the project would be "9.7 percent and 52.6 percent above baseline local and regional residential VMT per capita averages, respectively." In other words, the residential VMT efficiency of the Proposed Project would be too high (i.e., too inefficient) relative to city-wide and regional averages. For these reasons, the SEIR determined that the VMT impact would be significant and unavoidable.

In the GHG analysis under Impact 4.2-7, the SEIR fails to acknowledge its significant impact determination regarding VMT (under Impact 4.6-4) in its analysis of whether the Proposed Project would "conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs," as stated on page 4.2-35 of the SEIR. There is no discussion of whether the Proposed Project—and more specifically, the VMT efficiency of the Proposed Project—would be consistent with CARB's 2022 Scoping Plan. One of the key actions outlined in the Scoping Plan is to reduce VMT per capita to 25 percent below 2019 levels by 2030, and to 30 percent below 2019 levels by 2045. (See pages 72 and 194 of the Scoping Plan). On page 100, CARB's 2022 Scoping Plan states, "Since the transportation sector is the largest source of GHG emissions and harmful local air pollution, we must continue to research and invest in efforts to deploy zero emissions technologies and clean fuels, *and to reduce VMT*" [italics added for emphasis]. On page 192, CARB's 2022 Scoping Plan states, "Though GHG emissions are declining due to cleaner vehicles and fuels, rising VMT can offset the effective benefits of adopted regulations." And Appendix E of the Scoping Plan "elaborates on reasons for reducing VMT and identifies a series of policies that, if implemented by various responsible authorities, could help to achieve the recommended VMT reduction trajectory included in this Scoping Plan." (page 193)

11-20

Comment 12. The operational VMT of the Proposed Project would also conflict with the City of Davis 2023 *Climate Action and Adaptation Plan* (CAAP). CAAP Action TR.11, Develop sustainable housing, states the city's climate action goal to "increase housing opportunities to support the jobs/housing balance *and decrease vehicle miles traveled*. Develop incentive options to increase housing construction in the city, including high-density, mixed-use (especially office space and food service), transit-oriented, and affordable options" [italics added for emphasis] (page 83). Thus, it is clear that the City recognizes the importance of high VMT efficiency in achieving its GHG reduction targets. The SEIR analysis needs to as well.

Because the VMT efficiency of the residential component of the Proposed Project would both exceed the existing citywide and regional averages, and because the Proposed Project would be less VMT efficient than the average level of VMT efficiency in Davis, the Proposed Project would

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11-20 Cont.

conflict with both CARB's 2022 Scoping Plan and the City's 2023 CAAP. This is a significant GHG impact that needs to be disclosed in the SEIR. It is also a new impact because it was not identified in the 2009 EIR. Moreover, all feasible mitigation should be implemented to improve the Proposed Project's VMT efficiency, and the public should have the opportunity to review and weigh in on whether all feasible GHG reduction measures and VMT reduction measures were adequately considered.

11-21

Comment 13. Moreover, even if all the vehicles that operate in Davis are zero emission vehicles, VMT efficiency is important because it aligns with the energy efficiency goals in CARB's 2022 Scoping Plan and the City's 2023 CAAP. Thus, the project's low VMT efficiency should also be a consideration under Impact 4.2-5, which evaluates whether the Proposed Project would result in "the inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency." Policy ENERGY 1.5 in the City of Davis General Plan is to "Encourage the development of energy-efficient subdivisions and buildings." Because of it is VMT *inefficient*, the Proposed Project would not be an energy-efficient subdivision. And, for this reason, the Proposed Project would "result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources," which is the qualitative threshold of significance stated on page 4.2-35 of the SEIR. This is a significant impact that needs to be disclosed in the SEIR.

11-22

Comment 13. The City and its consultants have errored by not mentioning the VMT goal from the Davis CAAP in Section 4.7, Transportation, of the SEIR. This is poor preparation of a CEQA document and the SEIR should be revised to fully disclose this highly relevant VMT goal in its analysis.

Additional Feasible Mitigation Shall be Implemented to Reduce Operational VMT

11-23

Comment 14. The project shall consider all mitigation measures that would reduce the project's operational VMT, including the measures listed below. By reducing VMT, all these measures would also reduce mobile-source GHG emissions. If any of these measures are infeasible, the SEIR should provide an explanation supported by evidence.

11-24

1. Implement Measure T-17, Improve Street Connectivity, from CAPCOA's 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Equity and Health*, page 130 (Available: https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft_2021-Aug.pdf. Accessed: September 13, 2024). CAPCOA states, "This measure accounts for the VMT reduction achieved by a project that is designed with a higher density of vehicle intersections compared to the average intersection density in the U.S. Increased vehicle intersection density is a proxy for street connectivity improvements, which help to facilitate a greater number of shorter trips and thus a reduction in GHG emissions." The project applicant shall coordinate with the City and Unitrans to include at least one street connection between the proposed project and the existing Wildhorse neighborhood for travel by transit buses. This would enable Unitrans and Yolo Bus to more efficiently serve the land uses of the Proposed Project and those existing land uses in Wildhorse. A bus should be able to travel between the Proposed Project and the existing Wildhorse

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11-24 Cont.

neighborhood without having to backtrack to Covell Blvd. Otherwise, the Proposed Project essentially would be a single 25.8-acre cul-de-sac with poor connectivity. Such street connections would result in lower VMT by transit buses, reduce Unitrans travel times, and positively influence transit ridership. Moreover, this connection would enable commercial delivery vehicles (e.g., DoorDash, Uber Eats, FedEx, UPS, U.S. Mail) to efficiently make deliveries to the land uses that comprise the Proposed Project and the existing Wildhorse neighborhood. These types of delivery trips are important because commercial deliveries are the fastest growing sector of VMT. Such street connections would also make it more convenient for residents of the Proposed Project to carpool with residents of the existing Wildhorse neighborhood. (Moreover, this measure would also improve access for emergency vehicles and reduce response times by first responders). If desired, the street connections between the Proposed Project and the Wildhorse neighborhood could be restricted to transit vehicles, delivery vehicles, emergency vehicles, cyclists, and pedestrians. Also, if desired, these short connections could be operated as one-lane bridges to prevent them from having to be as wide as a standard residential street. One possible connection would be between the west end of Merens Street, as shown on Figure 3-3 in the SEIR, and east end of Bonnard Street in Wildhorse. Another possible connection could be between the northeast corner of the Proposed Project and the east end of Caravaggio Drive in Wildhorse. This measure is consistent with the measure required by Mitigation Measure 4.10-1 of the 2009 Wildhorse Ranch EIR, which states, "Incorporate public transit into project design" (Table 4.10-6 on page 4.10-21). And this comment emphasizes that the measure is to incorporate transit *into* project design rather than locate the project *near* transit. This distinction is important. And another measure on the same page of the 2009 Wildhorse Ranch EIR states, "Create travel routes that ensure that destinations may be reached conveniently by public transportation, bicycling or walking."

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11-27

2. Locate the highest-density housing, including the 40 attached affordable housing units, closest to transit stops. This measure would be consistent with Measure T-3, Provide Transit-Oriented Development, in CAPCOA's 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Equity and Health*, page 130 (Available: https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft_2021-Aug.pdf. Accessed: September 13, 2024). The highest density residential areas of the Proposed Project should be developed in the most transit-accessible location. They should be located on the portion of the Project site that are closest to transit stops. And the applicant shall collaborate with the City and Unitrans to determine these locations. This would increase transit use by project residents, reduce VMT, and reduce GHGs.

11-28

3. The project applicant shall develop affordable housing on one or more infill sites in or near downtown Davis. Research shows that residents who live in affordable housing located on infill sites generate less daily VMT than the regional average. Such a project would be GHG efficient and would offset the poor VMT efficiency of the proposed project.

11-29

4. The project applicant shall implement a free transit pass program. This entails providing a free transit pass to every resident who is not otherwise eligible for a free transit pass (e.g., UC Davis students, DJUSD students). Each resident shall have the choice of a free transit pass for Yolo Bus or Unitrans. This measure is consistent with Measure T-29, Reduce Transit

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Fares, in CAPCOA's 2022 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Equity and Health*, page 199. This measure is consistent with the measure identified in the 2009 EIR for the Wildhorse Ranch Project, which states, "The project intends to provide two prepaid annual passes for the Unitrans bus system for each residence, in order to encourage the use of public transit by residents of the community." (page 4.10-9).

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5. Install and maintain a designated secure, indoor bicycle storage area for all residential land uses, including multifamily dwelling units. The measure is consistent with Measure T-10, Provide End-of-Trip Bicycle Facilities in CAPCOA's 2021 CAPCOA's 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Equity and Health* (page100). This measure encourages commuting by bicycle, thereby reducing VMT and GHG emissions.

11-32

6. Fund, install, and maintain bike racks or bike lockers at the bus stops closest to the project site that are part of the Unitrans L line, Unitrans P line, Unitrans Q line, the Yolo Bus 42 line and the Yolo Bus 43 line. This measure will also help reduce the level of VMT generated by the project, as well as other nearby developed areas.

Additional Feasible Mitigation Shall be Implemented to Reduce Operational GHG Emissions

11-33

Comment 15. The project shall consider all mitigation measures that would reduce the project's operational GHG emissions, including the measures listed below. If any of these measures are infeasible, the SEIR should provide an explanation using supporting evidence.

1. Implement all applicable energy efficiency standards set forth in Tier 2 of California Green Building Energy Codes (CALGreen) in the design of all buildings.
2. Install solar panels on all building rooftops and on canopies above all parking lots, as well as battery energy systems, sufficient to meet the 90 percent of the annual electricity demand, including anticipated demand for charging electric vehicles. Design all buildings with south facing rooftops to maximize solar energy. Install solar panels on any shade structures at the park, Aquatic Complex, and Pentathlon Center. This measure is consistent with the design measure stated on page 4.10-17 of the 2009 Wildhorse Ranch EIR, which states, "The sustainability consultant for the proposed project will work with the project architect to provide the layout of the residences so as to minimize solar gain through east and west facades; the basic layout of the project as it currently stands is conducive to passive solar design principles, but some adjustment during the tentative map stage will be undergone in order to reduce the east/west wall surface. In the project development stage, the project applicant will ensure that roof orientation (south and west) and pitch are conducive to maximize the output of the photovoltaic installations." This measure is also consistent with the design measure stated on page 4.10-17 of the 2009 Wildhorse Ranch EIR, which states, "The passive design and energy equipment strategies associated with the project would reduce energy demand by 25 percent below 2009 Title 24 requirements. Most of the remaining residential energy use (and hence GHG emissions) would be reduced further through photovoltaic systems sized in accord with the City's Green Building standards, to the lesser of either 2.4 kilowatts (kW) or 90 percent of demand. In the instance

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11-34 Cont.

where the roof area is insufficient to accommodate the target system size, the system would be sized to generate the most energy for the home as determined by the available roof area."

3. Provide a Level EV charging station at every single-family residence, cottage, and townhome. The project description in the EIR states only that all single-family residential units "would support Level 2 EV charging," which is vague. The project shall include actual Level 2 EV chargers at every single-family residence, cottage, and townhome. This measure is consistent with the measure stated on page 4.10-19 of the 2009 Wildhorse Ranch EIR, which states, "Provide garage space and hook-ups for electrical vehicles. The current sustainability plan would provide garage space for 1.5 to two cars for each residence; therefore, providing space for an electric car." **11-35**
4. Install cool roofs on all buildings. Cool roofs are designed to reflect more sunlight and absorb less heat than a standard roof, keeping buildings cooler in the summertime and thus reducing air-conditioning loads. Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the most recent version of the California Green Building Energy Code (CALGreen). Alternatively, install green roofs that consist of a layer of vegetation on top of buildings, which provides natural insulation and climate control benefits. These roof designs will provide energy efficiency benefits to the buildings, particularly during the heat of summer. This measure is consistent with the measure required by Mitigation Measure 4.10-1 of the 2009 Wildhorse Ranch EIR, which states, "Install light colored 'cool' roofs, cool pavements, and strategically placed shade trees" (Table 4.10-6 on page 4.10-21). **11-36**
5. Implement Mitigation Measure E-21, Install Cool Pavements, from the CAPCOA *Handbook*. Install cool pavements in place of dark pavements. Cool pavements help to lower ambient outdoor air temperatures when compared to dark-colored, heat-absorbent pavements such as asphalt. This reduces the electricity needed to provide cooling in climates like the Sacrament Valley. **11-37**
6. For all dwelling units in multifamily residential units that are not dedicated as affordable, below market rate units, requiring parking costs to be unbundled from costs to rent or own a residential unit. **11-38**
7. Install cool pavements in place of dark pavements along all streets, parking lots, driveways, bike paths, and sidewalks. Cool pavements help to lower ambient outdoor air temperatures when compared to dark-colored, heat-absorbent pavements such as conventional asphalt. This reduces the electricity needed to provide cooling, thereby reducing associated GHG emissions depending on the project parameters. **11-39**
8. Install rainwater collection and storage systems as part of every building rooftop so that collected rainwater can be used for outdoor irrigation. Also install graywater systems in every building with indoor water use. These design features will reduce the volume of water needed to be supplied to the project site from offsite systems, and associated energy consumption. **11-40**
9. All swimming pools, including those at the aquatic complex, shall be designed and constructed to use solar water heating or other technologies with equivalent energy efficiency. Natural gas or other fossil fuels should not be used for heating swimming pool water. **11-41**

Letter 11
Cont.

11-42

9. The project shall replace diesel-powered agricultural pumps in Yolo County with electric pumps and install the necessary electricity connections to the grid or solar photovoltaic systems that supply the pumps with necessary power. This would be a local GHG offset measure.

11-43

The project shall also implement the six VMT mitigation measures listed above, which would have the co-benefit of reducing mobile-source GHG emissions.

Thank you for the opportunity to submit these comments.

Sincerely,

Austin Kerr
Davis, CA
jakerr44@gmail.com

LETTER 11: AUSTIN KERR

Response to Comment 11-1

The comment summarizes multiple claims against the adequacy of the Draft SEIR, which are discussed in further detail in the letter's subsequent comments. Please see the Responses to Comments 11-2 through 11-43. As detailed therein, the analyses and conclusions of the Draft SEIR are adequate.

Response to Comment 11-2

Contrary to the comment, as stated on page 3-8 of the Project Description chapter of the Draft SEIR, the multi-family apartment building would be located adjacent to the north of East Covell Boulevard, and immediately east of the new Palomino Way (the new northern leg of the East Covell Boulevard/Monarch Lane intersection). As detailed on page 3-16 of the Draft SEIR, the proposed 45 multi-family residences would be deed-restricted as affordable housing units. Thus, the Project Description chapter of the Draft SEIR is adequate.

Response to Comment 11-3

CEQA does not require that for the purposes of analyzing GHG emissions the same threshold be used when determining if a significant impact would occur during project construction and operation. Rather, the significance thresholds for GHG emissions are based on the guidance established by CEQA Guidelines Section 15064.4, which states the following:

> (a) The determination of the significance of GHG emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project.
>
> (b) A lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:
>
> (1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
>
> (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project;
>
> (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

As stated on pages 4.2-40 and 4.2-41 in the Air Quality, Greenhouse Gas Emissions, and Energy chapter of the Draft SEIR, the City has not specifically adopted goals or thresholds to analyze GHG emissions associated with construction of proposed development projects. The Yolo-Solano Air Quality Management District (YSAQMD) currently recommends that GHG analysis of development projects' construction and operational activities be consistent with the Sacramento Metropolitan Air Quality Management District's (SMAQMD) adopted thresholds of significance. For construction-related GHG emissions, SMAQMD has adopted a threshold of significance of

1,100 metric tons of carbon dioxide equivalents per year ($MTCO_2e$/yr). As such, the Draft SEIR uses a significance threshold of 1,100 $MTCO_2e$/yr, consistent with YSAQMD and SMAQMD guidance. As discussed under Impact 4.2-7 of the Draft SEIR, which starts on page 4.2-61, while the Proposed Project Scenario would result in a net increase in construction GHG emissions as compared to the Baseline Conditions Scenario, both the net increase in GHG emissions, as well as the total unmitigated construction GHG emissions associate with the proposed project would be below the SMAQMD 1,100 $MTCO_2e$/yr threshold of significance. Thus, the Draft SEIR concludes that the currently proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG during construction.

It should also be noted that the 1,191 $MTCO_2e$/yr for the Baseline Scenario and the 2,188 $MTCO_2e$/yr for the proposed project referenced in the comment are the total GHG emissions that would be generated over the entire construction period for each scenario. However, the SMAQMD's adopted threshold of significance is in units of GHG emissions per year. Thus, rather than comparing the total GHG emissions generated over the entire construction period (which would occur over multiple years) to the SMAQMD's adopted threshold of significance, the Draft SEIR correctly compares the maximum annual construction-related GHG emissions generated by each scenario to the annual GHG emissions per year threshold. However, an error was detected in the construction-related GHG emissions for the Baseline Conditions Scenario presented in the Draft SEIR. Specifically, the GHG emissions presented in Table 4.2-11 of the Draft SEIR for the Baseline Conditions Scenario do not represent the maximum annual construction-related GHG emissions for the scenario. As such, Table 4.2-11 of the Draft SEIR is hereby revised as follows:

Table 4.2-11
Maximum Unmitigated Construction GHG Emissions

	GHG Emissions ($MTCO_2e$/yr)
Baseline Conditions Scenario	527 ~~232~~
Proposed Project Scenario	785
Net Change	*+258* ~~*+553*~~
Threshold of Significance	**1,100**
Exceeds Threshold?	**NO**
Source: CalEEMod, March 2024 (see Appendix C).	

The foregoing revisions are for clarification purposes only and do not affect the conclusions of the Draft SEIR. In fact, considering the corrections to Table 4.2-11, the net increase in construction GHG emissions that would occur as a result of the Proposed Project Scenario as compared to the Baseline Conditions Scenario would be even less than what was presented in the Draft SEIR.

Based on the above, the Draft SEIR's analyses and conclusions of GHG emissions associated with project construction are adequate.

Response to Comment 11-4

The CEQA Guidelines do not require a project to implement mitigation for potential impacts that are determined to be less than significant. As discussed under Impact 4.2-7 in the Air Quality, Greenhouse Gas Emissions, and Energy chapter of the Draft SEIR, as well as Response to Comment 11-3, the net increase in project construction GHG emissions compared to the approved project (+258 $MTCO_2e$/yr), as well as total unmitigated construction GHG emissions,

would be below the SMAQMD 1,100 MTCO_2e/yr threshold of significance. Thus, mitigation is not required.

Response to Comment 11-5

Please see Response to Comment 11-3. In addition, as discussed on page 4.2-39 of the Draft SEIR, SMAQMD's threshold of significance for construction and operational GHG emissions have been developed to ensure consistency with the emissions-reduction goals of AB 32, SB 32, the Scoping Plan, and relevant executive orders. Thus, while other approaches may be used in other areas of the State, and even by other development projects within the region to reduce GHG emissions, use of the SMAQMD GHG thresholds of significance for the proposed project is appropriate.

Response to Comment 11-6

Please see Response to Comment 11-3.

In addition, in *Tsakopoulos Investments, LLC v. County of Sacramento* (2023) 95 Cal.App.5th 280, the Third District Court of Appeal affirmed a judgment denying a CEQA challenge to Sacramento County's approval of a mixed-use development project known as the Mather South Community Master Plan (MSCMP). As discussed therein, in the Air Quality chapter of the EIR prepared for the MSCMP, the County did not develop a threshold of significance for construction-related GHG emissions. As part of its reasoning for such an approach, the County explained that "[e]missions resulting from the usage of off-road vehicles is only 4.7 percent of the total inventoried emissions in Sacramento County, which include emissions from recreational and industrial equipment in addition to construction fleets. Although emissions from the operation of newly constructed buildings adds to existing building stock resulting in a cumulative year-on-year increase in emissions, the level of construction activity required to build new buildings in a region does not result in a cumulative increase in emissions because of their temporary nature." Citing construction activities' required compliance with existing regulations, such as the California Air Resources Board's (CARB) Low Carbon Fuel Standard, as well as standard mitigation applied for the purpose of reducing other air pollutants, the County determined in the MSCMP EIR that "…construction emissions would not contribute to a significant climate change impact, and no threshold is necessary."

Although the County did not provide a threshold for GHG emissions generated during construction, the County still calculated and presented the MSCMP's anticipated GHG emissions from construction-related activities for each year in an appendix to the EIR. The appendix additionally contained the anticipated annual GHG emissions that would occur during operations of the MSCMP associated with the project's residential, non-residential, and transportation uses. The Third District Court found that "[t]he final report is informative as to the level of emissions expected from construction-related activities and provides the public with the ability to compare those numbers against the greenhouse gas emissions expected upon project build out."

Ultimately, the Third District Court cited CEQA Guidelines Section 15064.4, which focuses on a lead agency's responsibilities for determining the significance of impacts from GHG emissions. The Third District Court ruled that "[t]he County complied with the Guidelines and Tsakopoulos presents no credible argument to the contrary."

Given the Third District Court's determination in *Tsakopoulos Investments, LLC v. County of Sacramento* (2023) 95 Cal.App.5th 280, the Draft SEIR's analysis of GHG emissions similarly

complies with CEQA Guidelines Section 15064.4, as, unlike the MSCMP EIR (which was found to contain an adequate GHG analysis), the Draft SEIR provides quantitative thresholds against which to analyze GHG emissions. The 1,100 $MTCO_2e$/yr numerical threshold used by SMAQMD is a screening level threshold that has been established as an accepted threshold and is used by several other air districts throughout the State, including the Placer County Air Pollution Control District (PCAPCD), which also has jurisdiction of a portion of the SVAB. Similar to the MSCMP EIR, the Draft SEIR also includes data in Appendix C that allows the public to compare the level of GHG emissions expected from construction-related activities against the emissions expected upon project buildout. Thus, the analyses and conclusions in the Draft SEIR's Air Quality, Greenhouse Gas Emissions, and Energy chapter are adequate.

Response to Comment 11-7

As stated within Chapter 6, Greenhouse Gas Emissions, of the SMAQMD Guide to Air Quality Assessment in Sacramento County, the threshold of significance for the construction phase of all project types is "1,100 metric tons of CO_2e per year." Contrary to the comment, the applicable threshold is not defined as 1,100 $MTCO_2e$ during any 12-month period. As such, the analysis and conclusion of Impact 4.2-7 of the Draft SEIR are adequate.

Response to Comment 11-8

The comment introduces concerns related to the Draft SEIR's analysis of project-generated operational GHG emissions, which are detailed further in subsequent comments. Please see Responses to Comments 11-9 through 11-17. As discussed therein, the Draft SEIR's analyses and conclusions related to operational GHG emissions are adequate.

Response to Comment 11-9

As stated on page 4.2-42 of the Draft SEIR, in the Method of Analysis section of Chapter 4.2, Air Quality, Greenhouse Gas Emissions, and Energy, Fehr & Peers provided specific trip generation rates and VMT for the land uses that would be developed under the Baseline Conditions Scenario and the Proposed Project Scenario, which were applied to the project modeling. The Method of Analysis that was used by Fehr & Peers is described in detail starting on page 4.6-19 of the Draft SEIR (see Chapter 4.6, Transportation therein), as well as within the TIS that was prepared for the project and included as Appendix H to the Draft SEIR. Please also see Response to Comment 11-10 below.

Response to Comment 11-10

As stated on page 4.2-42 of the Draft SEIR, Fehr & Peers provided specific trip generation rates and VMT for the land uses that would be developed under the Baseline Conditions Scenario and the Proposed Project Scenario, which were applied to the project modeling. As provided on page 4.6-20 of the Draft SEIR, the Methods of Analysis section in the Transportation chapter provides a description of how the trip generation rates and VMT were assessed within the TIS prepared for the proposed project by Fehr & Peers (see Appendix H of the Draft SEIR).

Specifically, the trip generation estimates for the residential component of the proposed project and for the baseline scenario were derived from daily trip rates published in the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 11th Edition (2021). Specifically, Fehr & Peers derived the trip generation estimates from ITE Land Use Code 210, which assumed 9.43 trips per residence. However, the mix of land uses proposed as part of the Palomino Place Project result in greater internal capture and bicycle, pedestrian, and transit use as compared to the baseline scenario. Thus, the trip rate assumed for the proposed project took into account such

reductions, and, as a result, the trip rate applied to the residential component of the proposed project was reduced from the 9.43 trips per unit, as shown in Table 4.6-3 of the Draft SEIR.

The trip generation estimates for the baseline scenario were based on a unit count of 259 units, which is consistent with the TIS and GHG analysis that was prepared for the 2009 EIR (see Chapter 4.10, Climate Change). However, the Wildhorse Ranch Project was ultimately approved by the City Council for development with up to 191 units. Thus, to provide a more accurate representation of trips associated with the 191 units, the Baseline Conditions Scenario has been revised based on updated vehicle trips and VMT provided by Fehr & Peers. The updated modeling is included as Appendix A to this Final SEIR.

It should also be noted that in responding to these public comments, an inadvertent error was detected in how the trip rate was applied in the California Emissions Estimator Model (CalEEMod) for the USA Pentathlon Training Facility. The updated modeling in Appendix A of this Final SEIR now uses the correct trip rate.

Table 4.2-10 of the Draft SEIR is hereby revised as follows:

Table 4.2-10
Maximum Unmitigated Operational Emissions

	ROG (tons/yr)	NO_X (tons/yr)	PM_{10} (lbs/day)
Baseline Conditions Scenario	2.53 ~~2.98~~	1.58 ~~2.06~~	13.1 ~~17.7~~
Proposed Project Scenario	2.64 ~~1.12~~	1.42 ~~2.23~~	11.3
Net Change	*+0.11 ~~-1.86~~*	*-0.16 ~~+0.17~~*	*-1.8 ~~-6.4~~*
YSAQMD Threshold of Significance	**10.00**	**10.00**	**80.00**
Exceeds Threshold?	**NO**	**NO**	**NO**
Source: CalEEMod, October ~~March~~ 2024 (see Appendix C).			

Page 4.2-46 of the Draft SEIR is hereby revised as follows:

> As demonstrated in Table 4.2-10, the Proposed Project Scenario would result in a net increase in operational emissions of ROG ~~NO_X~~ and a net decrease in operational emissions of NO_X ~~ROG~~ and PM_{10}, as compared to the Baseline Conditions Scenario. Operational emissions of ROG, NO_X, and PM_{10} associated with the Proposed Project Scenario would be below the applicable YSAQMD thresholds of significance.

Page 4.2-48 of the Draft SEIR is hereby revised as follows:

> The PCAPCD has a numerical screening level for localized CO impacts. According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day. According to the modeling performed for the proposed project, the Proposed Project Scenario would result in maximum unmitigated operational mobile source CO emissions of 57.5 ~~89.4~~ lbs/day, which is a reduction of 8.5 ~~11.6~~ lbs/day as compared to the 66.0 ~~101~~ lbs/day of operational mobile source CO emissions that would be generated by the Approved Conditions Scenario (see Appendix C). Consequently, CO emissions related to mobile sources associated with operation of the proposed project would be below the 550 lbs/day screening threshold used by PCAPCD, and, according to the PCAPCD's screening methodology for localized CO emissions, the proposed project would not be expected to

generate localized CO emissions that would contribute to an exceedance of AAQS or expose sensitive receptors to substantial concentrations of localized CO.

Pages 4.2-56 and 4.2-57 of the Draft SEIR is hereby revised as follows:

The average fuel economy for the U.S. passenger vehicle fleet was 24.8 miles per gallon (mpg) in 2022, the most recent year such data is available.[6] In addition, petroleum refineries in the U.S. typically produce approximately 20 gallons of gasoline from one 42-gallon barrel of crude oil. Using an average of 24.8 mpg and an annual VMT of approximately 5,679,857,[7] the project would result in the consumption of approximately 11,487 barrels of crude oil a year, which is a reduction of 1,826 ~~10,660~~ barrels as compared to the 13,313 ~~22,147~~[8] barrels of crude oil a year that would be consumed under buildout of the Wildhorse Ranch Project. California is estimated to consume approximately 605 million barrels of petroleum per year.[9] Based on the annual consumption within the State, vehicle trips generated by the proposed project would result in a 0.002 percent increase in the State's current consumption of gasoline, a decrease as compared to the 0.004 percent increase that would be associated with the Wildhorse Ranch Project.

Table 4.2-12 of the Draft SEIR is hereby revised as follows:

Table 4.2-12
Maximum Unmitigated Operational GHG Emissions

Emission Source	GHG Emissions ($MTCO_2e$/yr)		
	Baseline Conditions Scenario	**Proposed Project Scenario**	**Net Change**
Mobile	2,479 ~~3,362~~	2,110 ~~2,081~~	*-369 ~~-1,281~~*
Area	2.37	2.38	*+0.01*
Energy	298	265	*-33*
Water	13.1	12.7	*-0.4*
Waste	42.4	68.8	*+26.4*
Refrigerants	0.31	0.33	*+0.02*
Total Annual GHG Emissions	**2,836 ~~3,718~~**	**2,459 ~~2,430~~**	***-377 ~~-1,288~~***

Source: CalEEMod, October ~~March~~ 2024 (see Appendix C).

The foregoing revisions are for clarification purposes only, and do not affect the conclusions of the Draft SEIR.

Response to Comment 11-11

CalEEMod calculates VMT using default vehicle trips and trip lengths based on the land use types applied to the model. By updating such default vehicle data values with project-specific information, the modeling can more accurately account for mobile emissions associated with

[6] U.S. Energy Information Administration. *Total Energy, Table 1.8 Motor Vehicle Mileage, Fuel Consumption, and Fuel Economy*. Available at: https://www.eia.gov/totalenergy/data/browser/?tbl=T01.08#/?f=A&start=200001. Accessed March 2024.

[7] The annual VMT estimate presented herein is based on the Transportation Impact Study prepared for the proposed project by Fehr & Peers.

[8] Estimated using the annual VMT estimate for the Wildhorse Ranch Project of 6,602,949 ~~10,985,150~~, as provided by Fehr & Peers.

[9] U.S. Energy Information Administration. *California: State Profile and Energy Estimates*. Available at: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA. Accessed March 2024.

proposed projects. As stated on page 4.2-42 of the Draft SEIR, Fehr & Peers provided specific trip generation and VMT data for the land uses that would be developed under the Baseline Conditions Scenario and the Proposed Project Scenario. The trip rates and trip lengths for each land use type were adjusted in the CalEEMod modeling for the Proposed Project Scenario and the Baseline Conditions Scenario to reflect the project-specific data provided.

Response to Comment 11-12

As shown in Appendix C to the Draft EIR, the USA Pentathlon Training Facility and Aquatic Complex were modeled in CalEEMod as "Health Club" and "Recreational Swimming Pool" for the Proposed Project Scenario, as such land uses are the most similar to the USA Pentathlon Training Facility and Aquatic Complex. In addition, the CalEEMod modeling conducted for the proposed project accounted for the parking spaces that would be associated with the facility. Where project-specific information was available, such information was input into the model.

For example, as stated on page 4.2-42 of the Draft SEIR, Fehr & Peers provided specific trip generation rates and VMT for the land uses that would be developed under the Proposed Project Scenario, which were applied to the project modeling (including the USA Pentathlon Training Facility and Aquatic Complex). As provided on page 4.6-20 of the Draft SEIR, the Methods of Analysis section in the Transportation chapter provides a description of how the USA Pentathlon Training Facility and Aquatic Complex were assessed within the TIS prepared for the proposed project by Fehr & Peers (see Appendix H of the Draft SEIR). In addition, as discussed in Response to Comment 11-10, above, based on staff-initiated changes, minor updates have been made to the Proposed Project modeling to more accurately account for vehicle trips and VMT associated with the USA Pentathlon Training Facility and Aquatic Complex. Based on the updated modeling, revisions to the Draft SEIR have been provided in Response to Comment 11-10, above.

Response to Comment 11-13

Please see Responses to Comments 11-10 through 11-12.

Response to Comment 11-14

Please see Responses to Comments 11-10 and 11-11.

Response to Comment 11-15

Please see Responses to Comments 11-9 through 11-14. As discussed therein, the Draft SEIR's analyses and conclusions related to operational GHG emissions are adequate.

Response to Comment 11-16

As discussed on page 4.2-42 of the Draft SEIR, construction of both the Baseline Conditions Scenario and Proposed Project Scenario was assumed to start in April 2026. Due to the fact that the Baseline Conditions Scenario would require a year less of construction time than the Proposed Project Scenario, the Baseline Conditions Scenario was assumed to begin operation in 2028, rather than the 2029 operation year assumed for the Proposed Project Scenario, as once constructed, development projects typically do not wait a year before beginning operation. Based on the above, the modeling prepared for the Baseline Conditions Scenario and Proposed Project Scenario is adequate.

Response to Comment 11-17

Neither the City, YSAQMD, SMAQMD, nor the State require analysis or disclosure of a project's "GHG efficiency" (i.e., the $MTCO_2e$/yr per resident). The emissions presented in Table 4.2-12 of

the Draft SEIR represent the maximum unmitigated operational GHG emissions for the first year of full operation of the proposed project, which is presented in order to determine whether the proposed project would reach net neutrality compared to the Baseline Conditions Scenario, which is the threshold of significance used to determine whether the proposed project would conflict with the citywide net carbon neutrality goal established in the City's CAAP.

Response to Comment 11-18

The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. Table 2-1 of the 2022 Scoping Plan includes statewide actions that were included in the Scoping Plan Scenario modeling intended to reduce statewide GHG emissions. However, the 2022 Scoping Plan does not state that such measures are required to be implemented by local development projects. Specifically, the 2022 Scoping Plan includes separate guidance related to local actions in Appendix D of the plan. As stated on page 9 of Appendix D, local governments that prepare CEQA-qualified CAPs that include strategies in priority areas such as transportation electrification, VMT reduction, and building decarbonization are contributing to alignment between local climate action and the State's climate goals.

In addition, please see Response to Comment 11-6.

Response to Comment 11-19

The Draft SEIR is not required to evaluate the currently proposed project's consistency with the 2022 Scoping Plan for the purposes of determining a significant impact related to operational GHG emissions, as the City of Davis has an adopted CAAP. Pursuant to CEQA Guidelines Section 15064.4(b)(3), the lead agency should consider, among other factors, the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The Draft EIR complies with CEQA Guidelines Section 15064.4(b)(3) through evaluating the project's consistency with the City's CAAP.

Response to Comment 11-20

The comment states that the proposed project generates a significant impact conflict with the City of Davis' adopted CAAP because the project is inconsistent with CAAP Action TR.11. The proposed project's consistency with TR.11 is analyzed in the discussion of Impact 4.2-7 in the Draft SEIR. TR.11 provides that the City shall "[i]ncrease housing opportunities to support the jobs/housing balance and decrease vehicle miles traveled." In addition, TR.11 provides that the City shall develop "incentive options to increase housing construction in the city, including high-density, mixed-use (especially office space and food service), transit oriented and affordable options." As described in the Draft SEIR, the project is "generally consistent" with this goal, as the project would increase housing opportunities, including high-density, mixed-use, transit oriented, and affordable options. TR.11 is intended to promote residential development City-wide, which will have the effect of reducing vehicle miles traveled. The fact that the proposed project would result in increased per capita VMT does not in itself render the project inconsistent with TR.11 given that the project does meet most of the objectives of the policy.

Response to Comment 11-21

Please see Responses to Comments 11-19 and 11-20.

Response to Comment 11-22
Please see Response to Comment 11-20.

Response to Comment 11-23
The comment introduces recommendations for additional mitigation measures to address project-generated VMT per capita, which are detailed further in subsequent comments. Please see Responses to Comments 11-24 through 11-32. As discussed therein, Mitigation Measure SEIR 4.6-4 of the Draft SEIR to address project-generated VMT per capita is adequate.

Response to Comment 11-24
The comment correctly states that implementation of CAPCOA Handbook Strategy T-17 (Improve Street Connectivity) would further reduce project-generated VMT and associated GHG emissions. However, the City and project applicant have determined that an additional street connection between the project site and the existing Wildhorse neighborhood would be infeasible. Moreover, use of new project site street connections by Unitrans and Yolobus would be subject to individual transit operator decisions (based on operating plans, funding availability, and resource constraints) and, thus, cannot be guaranteed by the City. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-25
Please see Response to Comment 11-24. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-26
Please see Response to Comment 11-24. In addition, the currently proposed project would include a new shared-use path connection and emergency vehicle access (EVA) route between the Merens Street/Silesian Street and Caravaggio Drive/Bonnard Street intersections, which would enable bicycle, pedestrian, and emergency vehicle access between the project site and the existing Wildhorse neighborhood. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-27
Please see Responses to Comments 11-24 and 11-26. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-28
The currently proposed project's affordable multi-family apartment units would be located on the southerly edge of the project site, the closest on-site location to existing transit stops and services on East Covell Boulevard and Monarch Lane.

CAPCOA Handbook Strategy T-3 (Provide Transit-Oriented Development) would not result in reduced project-generated VMT and associated GHG emissions, because existing transit serving the project site would not qualify as a "high frequency transit station" in accordance with the CAPCOA definition (either rail or bus rapid transit with headways less than 15 minutes). Upgrading nearby transit stops and stations to qualifying "high frequency transit stations" would require actions by individual transit operators and, thus, cannot be guaranteed by the City. Therefore, inclusion of CAPCOA Handbook Strategy T-3 as a mitigation measure would not be feasible for the purposes of the Draft SEIR.

Response to Comment 11-29

The City of Davis cannot condition the project applicant to develop affordable housing at other locations beyond the boundaries of the project site as part of project approval. Such a suggestion is beyond the authority of the City. The City would enforce its applicable affordable housing regulations, should the currently proposed project be approved. As detailed on page 3-16 of the Draft SEIR, the proposed 45 on-site multi-family residences would be deed-restricted as affordable housing units, ensuring the project's compliance with the City's Affordable Housing Ordinance (Davis Municipal Code Article 18.05).

Response to Comment 11-30

Draft SEIR Mitigation Measure SEIR 4.6-4 on page 4.6-34 includes a related strategy, CAPCOA Handbook Strategy T-9 (Implement Subsidized or Discounted Transit Program), for residents of the proposed project's 45 affordable multi-family apartment dwelling units. Further project-generated VMT and associated GHG emissions reductions could be accomplished if this strategy would be implemented for all project residents; however, this was determined to be infeasible by the City and project applicant. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-31

CAPCOA Strategy T-10 (Provide End-of-Trip Bicycle Facilities) is applicable only to employment uses and, thus, would not contribute to reduced VMT and associated GHG emissions generated by the proposed project's residential component.

Response to Comment 11-32

While the strategy described by the comment has the potential to reduce project-generated VMT and associated GHG emissions, the strategy lacks supporting evidence necessary to quantify its effects. For example, the CAPCOA Handbook includes Strategy T-47 (Provide Bike Parking Near Transit) as a "non-quantifiable" GHG-reduction measure. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-33

The CEQA Guidelines do not require a project to implement mitigation for potential impacts that are determined to be less than significant. As discussed under Impact 4.2-7, which starts on page 4.2-61 of the Draft SEIR, the currently proposed project would not generate operational GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with the City's CAAP or County's 2020 GHG Emissions Inventory. Thus, the recommended mitigation measures are not necessary, and the Draft SEIR's analyses and conclusions related to project-generated GHG emissions are adequate. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-34

Please see Response to Comment 11-33.

Response to Comment 11-35

Please see Response to Comment 11-33.

Response to Comment 11-36

Please see Response to Comment 11-33.

Response to Comment 11-37
Please see Response to Comment 11-33.

Response to Comment 11-38
The comment correctly states that unbundled residential parking costs would further reduce project-generated VMT and associated GHG emissions. The commenter's suggestion is consistent with CAPCOA Handbook Strategy T-16 (Unbundle Residential Parking Costs from Property Cost). However, the City and project applicant have determined that this strategy would be infeasible. The only project dwelling units that could be subject to this strategy would be the 45 affordable multi-family apartment units, and implementation of this strategy would impose an additional cost to renters that would be inconsistent with the affordability goals of the proposed project. The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 11-39
Please see Response to Comment 11-33.

Response to Comment 11-40
Please see Response to Comment 11-33.

Response to Comment 11-41
Please see Response to Comment 11-33.

Response to Comment 11-42
Please see Response to Comment 11-33.

Response to Comment 11-43
Please see Response to Comments 11-24 through 11-32.

Letter 12

alclin2@hotmail.com
September 18, 2024

Attn: Eric Lee, Senior Planner
City of Davis Department of Community Development & Sustainability
23 Russell Blvd.
Davis, CA 95616 VIA E-MAIL
elee@cityofdavis.org

RE: Comments on Draft SEIR for Palomino Place

Dear Mr. Lee:

Thank you for the opportunity to comment on the Draft Subsequent Environmental Impact Report (DSEIR) for the Palomino Place project. We are Wildhorse residents and are writing to submit our comments on the DSEIR. Page numbers cited in this letter generally refer to the DSEIR.

12-1

1. **The DSEIR relies on outdated environmental documentation as the foundation for its analysis.** The EIR for the prior Wildhorse Ranch development proposal was prepared in 2009, fifteen years ago. At that time, Arnold Schwarzenegger was California's Governor, and MySpace was a leading social media site. The proposal analyzed in 2009 was substantially different from the current proposal, and it was made in a different social and environmental context. Despite the changes since then, the DSEIR asserts that it "needs only to contain the information necessary to make the previous EIR adequate for the proposed project, as revised" (p.1-5). This assertion ignores changed circumstances, a changed project, and the need for a completely new EIR.

12-2

2. **The DSEIR understates the City's ability to mitigate significant impacts.** The DSEIR repeatedly claims, for example, that inconsistencies with the site's zoning or General Plan designation cannot be mitigated because the proposed project was submitted pursuant to the Builder's Remedy (pp.6-10, 6-11). However, the settlement agreement between the developer and the City authorizes the City to "includ[e] conditions of approval that it feels would benefit the residents of Davis" (Settlement Agreement ¶ 1.c.iii). The agreement further recognizes that the City may "impos[e] . . . any reasonable and feasible conditions of approval or mitigation measures that are consistent with state law" (Settlement Agreement ¶ 2.e). These

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12-2 Cont.

provisions authorize the City to do much more to mitigate impacts than is proposed in the DSEIR.

3. **The DSEIR fails to consider the ramifications resulting from the lack of rezoning for the parcel.** The City has agreed to process the project application as a builder's remedy project without requiring the applicant to have the parcel rezoned from agricultural to residential and without obtaining a general plan amendment (p.1-3). As a result, it is not clear whether any zoning restrictions will apply to future property owners on the site. In the absence of zoning restrictions, future owners' use of the property will be unregulated and unpredictable. The analysis throughout the DSEIR fails to consider the environmental impacts that could result from such unregulated use.

12-3

The DSEIR's analysis of alternatives is faulty and inadequate.

4. The DSEIR fails to consider reasonable alternatives to the proposed project, as required by Sec. 15126.6 of the CEQA Guidelines. To address concerns regarding noise, light pollution, aesthetic impacts, loss of privacy, and other impacts on residents of existing homes on Caravaggio Drive, our scoping comment letter dated 3/18/24 suggested that the SEIR consider three alternatives. These alternatives included: an alternative that would establish a greenbelt between the fenceline of the existing homes on the east side of Caravaggio and lot numbers 106-118, an alternative that would transfer the proposed "tree buffer" land for lot numbers 106-118 to the existing homes on the east side of Caravaggio, and an alternative that would replace lots 113-118 and lot 133 with an urban forest or tree buffer. Each of these alternatives is feasible and reasonable, would attain most of the basic objectives of the project, and would mitigate some impacts. Moreover, the greenbelt alternative, in contrast to the present proposal, would be consistent with the City recommendation and policy that "10 percent of new residential development be dedicated to greenbelt areas" (p.4.5-8). The DSEIR should analyze these and other reasonable alternatives.

12-4

5. The DSEIR further errs in characterizing the increased density alternative as the "environmentally superior alternative" (p.2-5). The first problem with this characterization is that it is based solely on per capita vehicle miles traveled (VMT), to the exclusion of other relevant environmental impacts. Indeed, as the DSEIR acknowledges, "The environmentally superior alternative is generally the alternative that would be expected to generate the least number of significant impacts" (p.2-5). In other words, whether an alternative is environmentally superior depends on consideration of all environmental impacts of a project, not just a single factor. Second, even if one focuses on VMT, a denser project would generate higher *total* VMT, not lower VMT. The DSEIR implicitly acknowledges this point by stating that the increased density alternative is designed "to reduce *per capita*

12-5

12-6

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12-6 Cont.

VMT"—not total VMT (p.6-16) (emphasis added). Presumably, a denser project would generate not only more construction traffic and higher total VMT, but greater overall environmental impacts. The DSEIR's assertion to the contrary rests on dubious assumptions regarding future residents' commutes and proximity to businesses and other amenities.

12-7

6. The analysis of the alternatives in the DSEIR (pp. 6-14 to 6-31) is inadequate and supported by little or no quantitative data. The analysis is especially lacking with respect to the increased density alternative (pp. 6-16 to 6-21), which presumably would have greater impacts than the proposed project. The DSEIR's description of the increased density alternative is cursory, and its analysis conclusory. The document asserts repeatedly—and without support—that its impacts would be similar to the proposed project.

The DSEIR's analysis of environmental impacts is faulty and inadequate.

12-8

7. The DSEIR's analysis of impacts, including air pollution impacts, rests on an inappropriate baseline. The DSEIR asserts that "the environmental baseline . . . is appropriately considered to be the approved Wildhorse Ranch project" (p.4.2-40). This faulty assertion leads to all sorts of problems in the analysis of impacts and their significance. For example, the document makes the absurd claim that the proposed project "would result in a net reduction in operational GHG emissions." How can this be? Because, the DSEIR states, the current proposal would generate fewer GHG emissions than the 2009 proposal (p.4.2-63). Of course, the correct baseline for measuring impacts is the existing, undeveloped condition of the property—not the 2009 proposal. Cf. p.1-6 ("Normally the baseline condition is the physical condition that exists when the Notice of Preparation (NOP) is published."). In other words, to determine whether GHG emissions will increase, one should compare the proposal against the status quo, not a 15-year old proposal supported by stale analysis.

This flawed baseline determination permeates the entire DSEIR, including the analysis of impacts on aesthetics (p.4.1-13), air quality (p.4.2-40), biological resources (p.4.3-37), noise (4.4-16), and public services and utilities (4.5-23).

12-9

8. The DSEIR acknowledges that it must ensure visual consistency with adjacent uses (pp.4.1-18, 5-7) but fails to do so. The planned project would not be visually consistent with uses in the adjacent Wildhorse neighborhood, even with Mitigation Measure SEIR 4.1-2 (which vaguely refers to conditions of approval to be developed by the City, p.2-7).

12-10

Furthermore, the project would degrade the visual character and public views of the site. The DSEIR's aesthetics section asserts that the site can be treated as an "urbanized area" because it is adjacent to a densely populated area (p.4.1-2). But this high-density project, which includes a three-or

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12-10 Cont.

four-story apartment building, is not located in an "already highly urbanized area" (p.4.1-2). The neighboring Wildhorse subdivision to the west consists of one- and two-story homes, and the area directly to the east of the site is undeveloped and agricultural. The proposed development would significantly impact views stretching westward to the Coast Range, northward to the Sutter Buttes, and eastward to the Sierras.

12-11

9. The DSEIR fails to adequately consider the environmental impacts of the Pentathlon training facility. The facility, described as "Olympic-quality," would host regular weekly operations as well as larger tournaments with participants from outside the City (p.3-9). Increased air pollution and greenhouse gas emissions would likely result from travel to and from the facility, especially by participants traveling from outside Davis. However, the discussion of "Air Quality, Greenhouse Gas Emissions, and Energy" (Sec. 4.2) makes *no* mention of the pentathlon facility.

12-12

The Transportation chapter (Sec. 4.6) does discuss impacts in terms of vehicle miles traveled (VMT) to analyze effects on roadway systems (p.4.6-11). But that analysis completely disregards trips associated with local, regional, and national competitions and day camps (p.4.6-20). Only by arbitrarily assuming these trips away can the DSEIR assert that the facility would *reduce* total VMT within the region by 1,089 VMT (p.4.6-33, 6-30).

12-13

In addition, rather than analyzing the adequacy of parking for the Pentathlon facility—and the potential that users will park on surrounding streets—the DSEIR assumes without basis that the "limited parking" at the facility would limit the number of visitors (pp.4.4-23, 4.4-25).

12-14

10. The DSEIR fails to adequately analyze cumulative impacts of the proposal in the context of other potential developments. While the DSEIR lists numerous "[p]resent and future probable local projects" (p.5-5), its analysis of cumulative impacts, including such impacts on biological resources (p.4.3-85), public services (p.4.5-44 to 4.5-46), and traffic (p.4.6-40) is cursory. With respect to biological resources, for example, the DSEIR simply asserts—with little justification—that "compliance with the Yolo HCP/NCCP would prevent cumulative impacts." And with respect to traffic impacts, the DSEIR fails to recognize that the proposed development—along with other nearby potential developments— would compound the congestion on major arterial streets, busy intersections such as Mace & 2nd Street and Covell & Pole Line, and I-80, especially between Davis and Sacramento.

12-15

Mitigation measures identified in the DSEIR are inadequate to address significant effects. For example:

12-16

11. To mitigate impacts on special-status plant species not recently surveyed, the DSEIR proposes to require additional plant surveys—but only if construction

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12-16 Cont. has not commenced prior to March 20, 2025 (p.4.3-40). However, it makes no sense for protection of special status species to be contingent on the date construction happens to begin.

12-17 12. To mitigate impacts on Swainson's hawks and other raptors, the DSEIR proposes to conduct surveys and to monitor construction close to any nesting sites. Yet "[u]p to 20 Swainson's hawk nest trees . . . may be removed," and construction work may be stopped only "if raptors are exhibiting agitated behavior" (p.4.3-65). These measures are inadequate to avoid substantial adverse effects on these raptors. Similarly weak measures for other protected bird species (p.4.3-67 to 4.3-69) and bats (p.4.3-70 to 4.3-71) are also inadequate.

12-18 13. Cumulative impacts on the landscape and visual aspects from the proposed project and other foreseeable projects are significant but would not be mitigated (p.4.1-23). The DSEIR's discussion of these impacts points to Mitigation Measure SEIR 4.1-2—which vaguely refers to conditions of approval to be developed by the City, p.2-7—but acknowledges these impacts would continue to be significant even with mitigation.

12-19 14. Construction would occur close to existing Caravaggio Drive residences, resulting in significant noise and vibration impacts beyond those identified in the 2009 EIR (p.4.4-20). As the DSEIR concedes, the mitigation currently proposed will not avoid these significant impacts (p.4.4-21).

12-20 15. Residential VMT per capita would be well above city and regional averages and constitute a significant impact (p.4.6-33). The transportation demand management strategies identified are of questionable and limited efficacy in reducing VMT per capita, and even if implemented correctly, would not avoid this significant impact (p.4.6-37).

12-21 Thank you for your assistance in this matter. Please keep us informed on the status of the project, the CEQA process, and the City's decisionmaking process.

Sincerely,

/s/

Al Lin & Linh Thai

LETTER 12: LINH THAI AND AL LIN

Response to Comment 12-1

As stated on page 1-2 of the Draft SEIR, the City has determined that the currently proposed project could result in new significant impacts not previously identified in the 2009 EIR, which necessitated the preparation of the Draft SEIR. Thus, while the 2009 EIR serves to help inform the analysis of the currently proposed project, the 2009 EIR is not the sole basis upon which potential impacts are identified in the Draft SEIR for the currently proposed project. Importantly, several technical studies were prepared to address the modified project and the changes in circumstances since 2009. These include, but are not limited to, a new CalEEMod modeling (see Appendix C of the Draft SEIR), a Biological Resources Assessment (BRA) (see Appendix D of the Draft SEIR), an Environmental Noise & Vibration Assessment (Noise Assessment) (see Appendix E of the Draft SEIR), and a new TIS (see Appendix H of the Draft SEIR).

Response to Comment 12-2

The comment states that Draft SEIR understates the City's ability to mitigate significant impacts of the project. As discussed in the Draft SEIR and acknowledged by the commenter, the proposed project application invokes the "Builder's Remedy," which is based on a provision of California's Housing Accountability Act that prevents jurisdictions without a substantially compliant housing element from denying an eligible housing project on the basis that the project does not comply with the jurisdiction's general plan or zoning ordinance. With respect to the proposed project, the City and project applicant entered into a settlement agreement which provides, among other things, that the City will process the project application as a Builder's Remedy project and without requiring the applicant to submit for legislative entitlements such as a general plan amendment or zone change. Therefore, as described in the Draft SEIR, adopting a General Plan Amendment or rezoning the site in order to address inconsistencies with the City's policies and regulations and mitigate impacts associated with Aesthetics, Agriculture, Noise, and Land Use, would be infeasible.

The comment cites to language in the settlement agreement that allows the City to impose conditions of approval on the project "that it feels would benefit the City" and "consistent with state law." While the City intends to impose conditions of approval on the project to mitigate the impacts of the proposed project and clarify that residential standards shall apply to the project area, as described in Mitigation Measures 4.1-2 and 4.5-3, there is no feasible means to mitigate the project's conflict with the City 's general plan and zoning designations. In conclusion, the commenter correctly states that the City can impose conditions of approval on the project in order to mitigate the impacts associated with the project's zoning and general plan designation, and the City has done so to the extent feasible; the fundamental inconsistency cannot be feasibly mitigated and the impacts associated with this inconsistency are therefore significant and unavoidable.

Response to Comment 12-3

The comment states that the City has failed to fully analyze the ramifications of the project's Builder's Remedy posture, and states that future use of the site may be unregulated and unpredictable due to the projects' inconsistency with the City's general plan and zoning code regulations. This is incorrect. The Draft SEIR fully analyzed the project's inconsistency with the City's general plan designation and zoning regulations and determined that fundamentally, this inconsistency triggers a significant and unavoidable environmental impact. That said, conditions of approval will be imposed on the project to minimize the impacts of the inconsistency and ensure

that the project remains consistent with what was proposed over time. These conditions of approval, as well as mitigation measures, will remain enforceable over the life of the project.

Response to Comment 12-4

As discussed on page 6-1 of the Draft SEIR, CEQA Guidelines Section 15126.6(a) provides that the primary intent of the alternatives evaluation in an EIR is to "[…] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

The alternatives recommended by the comment would not lessen any of the significant effects of the currently proposed project and, thus, do not merit consideration as alternatives that should have been included in the Draft SEIR. A greenbelt between the property lines of the existing homes west of the project site and the proposed Lots 106 to 118, gifting the proposed tree buffer land to the owners of existing homes, or alternatively replacing Lots 113 to 118 and 133 with an urban forest or tree buffer would not reduce the significant and unavoidable effects related to aesthetics (inconsistency with the site's land use and zoning designations governing scenic quality), noise (ambient noise-level increases during project construction above threshold), transportation (project-generated VMT per capita above threshold), agricultural resources (inconsistency with the site's land use and zoning designations), or land use and planning (inconsistency with the site's land use and zoning designations). For example, the commenter's recommended alternatives would still be inconsistent with the site's land use and zoning designations. Construction noise levels associated with the recommended alternatives would be generally similar to those anticipated for the currently proposed project, as the vast majority of the project components would still require construction as part of the comment's recommended alternatives, and any decrease in units caused by the alternatives would increase the project-generated VMT per capita due to the alternatives involving less density than the proposed project. Thus, the analyses and conclusions in the Alternatives Analysis chapter of the Draft SEIR are adequate.

Additionally, while the CEQA Guidelines require a reasonable range of project alternatives to be evaluated in an EIR, the CEQA Guidelines do not specify a specific number of alternatives that need to be evaluated. The CEQA Guidelines also provide that every conceivable alternative does not need to be evaluated. The Draft SEIR includes a reasonable range of project alternatives and, thus, the Alternatives Analysis chapter of the Draft SEIR is adequate.

Response to Comment 12-5

As discussed on page 6-31 of the Draft SEIR, reduction of impacts related to VMT are considered a high priority due to the potential consequences of climate change for the City of Davis. While the Increased Density Alternative would result in greater impacts related to aesthetics and land use and planning, as compared to the currently proposed project, the Increased Density Alternative is the only alternative that eliminates the proposed project's significant and unavoidable VMT impact. Due to the City's prioritization of reducing impacts related to VMT, the Draft SEIR identifies the Increased Density Alternative as the Environmentally Superior Alternative. Thus, the analyses and conclusions in the Alternatives Analysis chapter of the Draft SEIR are adequate.

Additionally, with respect to the effect of increasing residential density on resulting VMT, please see the Master Response.

Response to Comment 12-6

Please see the Master Response.

Response to Comment 12-7

Please see Table 6-2 on page 6-32 of the Draft SEIR, which clearly discloses that the Increased Density Alternative would result in greater impacts related to aesthetics and land use and planning than the currently proposed project. Additionally, the analysis of the Increased Density Alternative's potential transportation impacts is based on quantified data from Fehr & Peers, which found that 260 residential units would be required to ensure the Increased Density Alternative would result in a per capita VMT of 17.9, which is approximately 17.5 percent less than the existing SACOG regional per capita VMT of 21.7 and approximately 31.6 percent less than the existing City of Davis per capita VMT of 30.1. Thus, the Alternatives Analysis chapter of the Draft SEIR is supported by quantified data. Furthermore, the CEQA Guidelines require that an EIR includes "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." The CEQA Guidelines do not require a quantitative analysis for all project alternatives. As is made clear in the Alternatives Analysis chapter, the Draft SEIR provides sufficient information about each project alternative to allow for meaningful evaluation, analysis, and comparison with the currently proposed project. Thus, the analyses and conclusions in the Alternatives Analysis chapter of the Draft SEIR are adequate.

Response to Comment 12-8

As discussed under Section 1.6, Definition of Baseline, which starts on page 1-6 of the Draft SEIR, typically, the baseline condition is the physical condition that exists on-site when the Notice of Preparation (NOP) is published. However, in cases where an approved project has already undergone environmental review and the environmental document has been certified or adopted by the lead agency, CEQA allows the lead agency to restrict the current review to the incremental effects of the modified project, rather than having to reconsider the overall impacts of the project. In such cases, as the project under review constitutes only a modification of a previously approved project, the "baseline" for the purposes of CEQA is adjusted such that the originally approved project is assumed to exist.[10] The Wildhorse Ranch Project has already undergone environmental review, with the Davis City Council certifying the 2009 EIR in July 2009 (State Clearinghouse [SCH] No. 2007072020). Thus, the environmental baseline in the Draft SEIR is appropriately considered to be the approved Wildhorse Ranch Project, which included a 191-unit residential development, dedication of 2.26 acres of additional agricultural buffer dedication, 1.61 acres of interior greenbelt, and 4.44 acres of interior open space. Therefore, the analyses and conclusions of the Draft EIR, including those related to operational GHG emissions, aesthetics, air quality, biological resources, noise, and public services and utilities, are adequate.

Response to Comment 12-9

The comment expresses a general opinion that the Draft SEIR fails to demonstrate how the currently proposed project would be visually consistent with surrounding existing uses under Impact 4.1-2, which starts on page 4.1-15 of the Draft SEIR, but does not provide specific examples of how the currently proposed project would be visually inconsistent with the Wildhorse neighborhood adjacent to the project site.

[10] See Michael H. Remy et al. *Guide to CEQA, 11th Edition*. Point Arena: Solano Press Books (2007), pg. 207; Stephen L. Kostka and Michael H. Zischke. *Practice Under the Environmental Quality Act, Second Edition* (Vol. 1). Oakland: Continuing Education of the Bar (2018), pgs. 12-32; *Benton v. Board of Supervisors* (1st Dist. 1991) 226 Cal. App. 3d 1467.

As discussed under Impact 4.1-2, the proposed single-family residences along the western site boundary would be single-family homes, generally consistent with the size of the existing homes located in the adjacent neighborhoods of Wildhorse and Slide Hill Park. Thus, the Draft SEIR concludes that the currently proposed project would be consistent with General Plan Policy UD 2.3, which necessitates that new development fit with the existing scale of the City. However, the Draft SEIR discloses that because under Builder's Remedy, the City cannot deny the currently proposed project based on its inconsistency with the project site's existing land use and zoning designations (Agriculture and PD 3-89, respectively), this inconsistency cannot be fully mitigated (although, Mitigation Measure SEIR 4.1-2 partially addresses the impact). Thus, the Draft SEIR acknowledges that visual consistency cannot be fully ensured and concludes that the currently proposed uses would be inconsistent with the land use and zoning designations of the site, potentially resulting in a significant and unavoidable impact. Based on the above, the analyses and conclusions in the Draft SEIR are adequate.

Response to Comment 12-10

As discussed on pages 4.1-1 and 4.1-2 of the Draft SEIR, Appendix G, Section I, Question c, defines public views as those that are experienced from a publicly accessible vantage point. The sample Initial Study checklist found in Appendix G to the CEQA Guidelines suggests that different aesthetic standards apply in "non-urbanized" and "urbanized areas" respectively. For non-urbanized areas, there is an inquiry asking whether a proposed project "would substantially degrade the existing visual character or quality of public views of the site and its surroundings." For urbanized areas, the question is whether the project would "conflict with applicable zoning and other regulations governing scenic quality." Under the CEQA Guidelines, "urbanized area" is a term of art defined in CEQA Guidelines Section 15387 as "a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile."

In highly developed areas, additional high-density development can reduce the long-term environmental effects of what is often called sprawl by making an efficient use of areas that are already highly urbanized. Thus, projects proposed in such areas only require an evaluation of consistency with city or county regulations that govern scenic quality, such as design guidelines. In contrast, in less developed areas, concerns about mass and height, and how they affect existing visual conditions, are more appropriate.

In the case of the currently proposed project, the project site is within an "urbanized area," as the site and surrounding properties include 1,000 persons per square mile. The City has, therefore, undertaken the inquiry appropriate for "urbanized areas." Based on the above, the Draft SEIR's characterization of the project as being within an urbanized area is adequate.

Response to Comment 12-11

The Draft SEIR modeled the operational criteria pollutant and GHG emissions associated with all components of the currently proposed project, including the USA Pentathlon Training Facility and pool complex. As detailed on page 4.2-42, Fehr & Peers provided specific trip generation rates and VMT for the land uses that would be developed under the Baseline Conditions Scenario and the Proposed Project Scenario, which were applied to the project modeling. All CalEEMod modeling results are included in Appendix C to the Draft SEIR. Thus, the Draft SEIR's analyses and conclusions related to the USA Pentathlon Training Facility and pool complex are adequate.

Response to Comment 12-12

The Draft SEIR's VMT analysis evaluates project-generated residential VMT per capita (for the proposed project's residential component) and the project's effect on total regional VMT (for the project's non-residential component) during a typical weekday using the SACOG SACSIM19 travel demand model. SACSIM19 is a typical weekday model that represents travel demand for a mid-weekday (Tuesday, Wednesday, or Thursday) during a Spring or early Fall month when schools are in regular session, when weather does not often affect peoples' activities or travel, and when a lower percentage of workers are on vacation.

According to the project applicant, local, regional, and national competitions and day camps associated with the USA Pentathlon Training Facility are anticipated to occur during weekends and/or summer and winter school breaks. Therefore, because such activities would not occur during a typical weekday, they are not relevant for the purposes of the Draft SEIR's VMT analysis. The Draft SEIR's VMT analysis appropriately evaluates typical weekday operations associated with the USA Pentathlon Training Facility, which would primarily be comprised of local classes and training sessions.

Response to Comment 12-13

CEQA does not require analysis of parking capacity as part of preparation of an EIR. While the environmental checklist found in CEQA Guidelines Appendix G previously required an assessment of a project's parking capacity, the 2010 CEQA Guidelines were updated to not include such provisions, as the environmental review process is intended to provide an impartial evaluation of the environmental impacts of a proposed project. As such, in most cases, CEQA does not currently require consideration of parking adequacy, unless a project's parking would result in substantial secondary effects on the physical environment. Thus, given the limited parking proposed at the USA Pentathlon Training Facility and pool complex (55 spaces), the Draft SEIR concludes on page 4.4-23 that significant crowd sizes at the pool complex are not anticipated. Thus, the Draft SEIR's statements related to parking at the USA Pentathlon Training Facility and pool complex are adequate.

Response to Comment 12-14

The comment expresses the general opinion that the Draft SEIR fails to adequately analyze cumulative impacts, but fails to provide specific examples to support the assertion for most of the topics addressed in the Draft SEIR. The Draft SEIR includes an analysis of cumulative impacts within the Aesthetics; Air Quality, Energy, and Greenhouse Gas Emissions; Biological Resources; Noise; Public Services and Utilities; Transportation; and Statutorily Required Sections chapters. In multiple chapters, the cumulative setting generally includes buildout of the proposed project in conjunction with the development of the Davis General Plan planning area, as well as a list of present and probable future projects; although, where appropriate, the cumulative setting is modified to be more applicable to the subject matter.

With regard to the allegation that the cumulative analysis in the Biological Resources chapter is deficient due to its citation of mandatory compliance of future development projects with the Yolo HCP/NCCP as a reason for why a new significant impact or substantially more severe significant impact related to the cumulative loss of special-status species habitat beyond what was previously identified in the 2009 EIR would not occur, please see the analysis under Impact 4.3-18, which starts on page 4.3-84 and includes the following:

> […] the Yolo HCP/NCCP requires the Yolo Habitat Conservancy to protect approximately 33,300 acres over 50 years, primarily through the acquisition of habitat conservation easements on agricultural land funded with development fees paid by project proponents. The Yolo HCP/NCCP coordinates conservation efforts to ensure that the lands are selected consistent with a conservation strategy based on biological criteria, including the selection of lands that provide habitat to multiple species and are located near existing protected lands and riparian areas. The Yolo Habitat Conservancy regularly consults with the CDFW and the USFWS to ensure that the Yolo HCP/NCCP is successfully and sustainably implemented. As such, the Yolo HCP/NCCP functions as the regional strategy for preserving natural habitat, and compliance with the Yolo HCP/NCCP would prevent cumulative impacts. It should be noted that projects within the City limits, including project[s] associated with buildout of the Davis General Plan planning area, as well as the list of present and probable future projects, would all be required to comply with the Yolo HCP/NCCP.

The above statement is factually true, and the comment does not provide any evidence to prove otherwise. Additionally, the comment is misleading, given that the comment insinuates the analysis under Impact 4.3-18 relies solely upon compliance with the Yolo HCP/NCCP as its reason for concluding a new significant cumulative impact or substantially more significant cumulative impact would not occur. To the contrary, the analysis under Impact 4.3-18 also cites the applicable federal, State, and local regulations to which the currently proposed project would be subject to prevent potential impacts to special-status species, including those both covered and not covered under the Yolo HCP/NCCP, and other protected biological resources. The analysis additionally cites the mitigation measures established by the Biological Resources chapter of the Draft SEIR, which would ensure a new significant impact or substantially more severe significant impact would not occur. Overall, the cumulative impact analysis in the Biological Resources chapter presents a well-supported argument and the analyses and conclusions contained therein are adequate.

With respect to public services, as discussed under Impact 4.5-9, which starts on page 4.5-44 of the Draft SEIR, similar to the currently proposed project, future development would be subject to development impact fees and existing local and State regulations, the combination of which would ensure future development does not necessitate the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts. With respect to transportation, as discussed on pages 4.6-40 and 4.6-41 of the Draft SEIR, the proposed project would not have a cumulatively considerable contribution related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, as Mitigation Measures SEIR 4.6-2(a) and (b) require that the currently proposed project help establish safe bicycle and pedestrian routes in the project vicinity. The foregoing facilities would help to reduce potential cumulative impacts related to a conflict with a program, plan, ordinance, or policy, addressing the circulation system, including bicycle facilities, pedestrian facilities, transit facilities and services, and emergency vehicle access. Similarly, the VMT impact analysis for buildout of the residential and non-residential components of the proposed project presented under Impact 4.6-4 would also apply to Cumulative Plus Project conditions. Thus, the analysis of cumulative public service and transportation impacts in the Draft SEIR are adequate.

Response to Comment 12-15

Please see Response to Comment 7-1.

Response to Comment 12-16

In accordance with CDFW guidance, the protocol-level plant surveys conducted for the currently proposed project are valid for three years. However, as explained under Impact 4.3-1 on page 4.3-30, given enough time (i.e., the start of spring 2025), plants may become established in areas where suitable habitat exists, such as the off-site Channel A and on-site ruderal areas featuring Tyndall soils. Therefore, the Draft SEIR concludes that special-status plants could become established within the foregoing portions of the study area in the interim between surveys/analysis and construction activities, which could result in potential impacts during project construction. To address the potential impact, Mitigation Measure SEIR 4.3-1 requires a new round of special-status plant surveys if construction has not commenced prior to spring 2025 and additional measures to prevent potential impacts from any special-status plants identified during the surveys. Based on the above, Mitigation Measure SEIR 4.3-1 is adequate.

Response to Comment 12-17

The comment expresses the general opinion that the Draft SEIR provides inadequate mitigation measures to address potential impacts to protected nesting bird and raptor species and special-status bats, but fails to provide specific examples to support the assertion. The mitigation measures in the Draft SEIR's Biological Resources chapter are based on the expertise of Madrone Ecological Consulting (Madrone); applicable federal, State, and local regulations and guidance; and industry-standard best practices.

With respect to Mitigation Measure 4.6-5 to address the potential significant impact to Swainson's hawk and white-tailed kite, the mitigation requires implementation of Yolo HCP/NCCP Avoidance and Minimization Measure (AMM) 16. Mitigation Measure 4.6-5 includes the verbatim wording of AMM16. This AMM was agreed upon by all parties/signatories to the Yolo HCP/NCCP, including CDFW. Thus, Mitigation Measure 4.6-5 is adequate.

Response to Comment 12-18

As discussed under Impact 4.1-2, which starts on page 4.1-15 of the Draft SEIR, under Builder's Remedy, the City cannot deny the currently proposed project based on its inconsistency with the project site's General Plan land use designation and zoning. While the currently proposed project would be consistent with General Plan Policies UD 2.1, UD 2.2., UD 2.3, and UD 2.5 and the proposed USA Pentathlon Training Facility and pool complex would be subject to the City's Site Plan and Architectural Review process (Davis Municipal Code Article 40.31), the applicable threshold under Impact 4.1-2 is whether the project would conflict with applicable zoning and other regulations governing scenic quality. Thus, although Mitigation Measure SEIR 4.1-2 would require the project applicant to comply with Conditions of Approval on the Tentative Map to ensure visual consistency between the project and the adjacent existing uses, the project would still be inconsistent with the site's Agriculture designation and PD 3-89 zoning. Thus, the Draft SEIR concludes the impact would remain significant and avoidable, as the mitigation does not solve the project's inconsistency with the site's zoning designation, which is the threshold. Such is also true in the analysis under Impact 4.1-4, which evaluates the project in the cumulative context.

Response to Comment 12-19

To the contrary of the comment's summary of the groundborne vibration analysis under Impact 4.4-3, which starts on page 4.4-27, the Draft SEIR concludes that the currently proposed project would not result in a new significant impact or substantially more severe significant impact related to the generation of excessive groundborne vibration or groundborne noise levels beyond what was identified in the 2009 EIR. The foregoing conclusion is based on the fact that vibration levels

generated from construction activities are predicted to be below thresholds for damage to engineered residential structures (98 VdB) at a distance of 25 feet from such activities (see Table 4.4-11 on page 4.4-27 of the Draft SEIR). Additionally, project operation would not involve uses that have equipment that generates appreciable off-site vibration.

As the comment notes, noise levels generated during project construction were determined to result in a significant and unavoidable impact under Impact 4.4-1, which starts on page 4.4-18. Mitigation Measure 4.5-3 may, in fact, reduce construction noise levels to a less-than-significant level; however, such an outcome depends on several factors (i.e., types of construction equipment used, proximity of equipment to residences, etc.) that cannot be conclusively determined.

Response to Comment 12-20

Please see Response to Comment 9-21.

Response to Comment 12-21

The comment is a conclusion statement and does not address the adequacy of the Draft SEIR.

Letter 13

Attn: Eric Lee, Senior Planner
City of Davis Department of Community Development & Sustainability
23 Russell Blvd.
Davis, CA 95616
elee@cityofdavis.org

RE: Comments for Draft SEIR for Palomino Place

Dear Mr. Lee:

13-1 We write as concerned Davis Resident who live in the Wildhorse Neighborhood. Our Wildhorse neighborhood is adjacent to the proposed location of Palomino Place. Below are our comments and concerns with the Draft SEIR for Palomino Place.

13-2 The storm drainage of Palomino Place needs to be taken much more seriously than is presented in the Draft SEIR. **Stormwater from Palomino Place will be added to Channel A** (pp. 128, 474-476) **which already reaches and exceeds maximum capacity** a couple times a year according to the Public Works Deputy Director. **Flooding of the Wildhorse neighborhood and Palomino Place, as a result of Channel A's lack of capacity, may be a real threat that needs to be taken more seriously.**

13-3 **The sewer line that will be placed under Channel A (p. 475) is very concerning.** Channel A drains into the Yolo wetlands to the East. There are only 2 other places where a sewer line crosses Channel A according to the Public Works Deputy Director. **It seems unwise to place another source of sewage contamination in Channel A.** Surely, it must be possible to extend an existing sewage line from a neighborhood on the south side of Channel A to the Palomino Place neighborhood, rather crossing Channel A with a sewer line. **In addition, the need to run a sewer line to the site, at all, brings Builder's Remedy into question.**

13-4 **The obstacle course (p. 140) on the Wildhorse Agricultural Buffer land is a completely inappropriate use of Agricultural buffer land**, no matter how small a footprint the obstacle course has. To quote the City's website "The 38-acre buffer provides critical wildlife habitat for burrowing owls, rabbits, and other wildlife. It also offer recreational opportunities (hiking, wildlife viewing). It includes two types of habitat (i.e., grassland and oak savannah habitat)." It would, instead, be appropriate for the developers to provide funds to the city to improve the wildlife habitat and trail of the buffer since it is in such close proximity to the Palomino Place neighborhood and the disturbances to wildlife it will cause.

13-5 The Penthathlon Facility (pp. 139-140) is very questionable at best. There is no specific source of funding for building and maintaining the Pentathlon Center. **Except for the**

Letter 13
Cont.

13-5 Cont. **pool, the Pentathlon Facility would not serve the recreational or social needs of the Palomino Place Neighborhood.** And as mentioned above, the Obstacle course is inappropriately placed on the Agricultural Buffer.

13-6 Therefore, a **feasible neighborhood-friendly alternative recreational/community use of the land donated for the Pentathlon Facility**, and it's pool, should be identified. It should be kept in mind that "Safe playgrounds, libraries and community centers can give children places to play and learn and also serve as valuable settings for parents to gather and build social connection." Vivek H. Murthy, USA Surgeon General.

13-7 **A sharp bend in Palomino Way (p. 137) is unacceptably close to the fence line of Carravagio Drive**. This will send headlight glare and car/truck noise and exhaust directly into houses on Carravagio Drive. A tree buffer will not be able to mitigate this situation.

13-8 **Parking lot A (p. 137) for the cottages is unacceptably close to the fence line of Carravagio Drive.** This will send headlight glare and car/truck noise and exhaust directly into houses on Carravagio Drive. A tree buffer will not be able to mitigate this situation.

13-9 **For how long will the affordable housing (pp. 138, 146) be deed restricted?** If only for 3 or 5 years, there will be no long-term impact on helping those in need of affordable housing and **calls the Builder's Remedy and other concessions into question.**

Sincerely,

Marjorie Longo and Michael Maddox
2240 Rockwell Drive
Davis, CA

LETTER 13: MAJORIE LONGO AND MICHEAL MADDOX

Response to Comment 13-1

The comment is an introductory statement and introduces concerns that are detailed further in subsequent comments. Please see Responses to Comments 13-2 through 13-9. As detailed therein, the analyses and conclusions of the Draft SEIR are adequate.

Response to Comment 13-2

Please see Response to Comment 2-4 and the analyses and conclusions under Section 4.7.6, Hydrology and Water Quality, which starts on page 4.7-12 of the Draft SEIR.

Response to Comment 13-3

Please see Response to Comment 2-2 and the analyses and conclusions in the Biological Resources chapter of the Draft SEIR.

Response to Comment 13-4

The Draft SEIR evaluated the potential for the currently proposed project to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors under Impact 4.3-15, which starts on page 4.3-76. As detailed therein, the proposed project would include installation of an obstacle course within a narrow portion of the 135-foot-wide Wildhorse Agricultural Buffer adjacent to the project site's eastern boundary in the southernmost portion of the buffer, near the proposed USA Pentathlon Training Facility and pool complex, as well as near East Covell Boulevard. While the project applicant subsequently withdrew their request for approval of the obstacle course, the obstacle course is still analyzed in the Draft SEIR as part of the project. While the obstacle course would encroach into the movement corridor within the Wildhorse Agricultural Buffer, the obstacle course would be located between the western fence line associated with the proposed project and the existing gravel path and adequate space would still exist for wildlife species to move through the corridor. Furthermore, the Wildhorse Agricultural Buffer is wider near the location of the proposed obstacle course due to existing configuration of the East Covell Boulevard undercrossing. Thus, the Draft SEIR concludes that the currently proposed project would not interfere substantially with the movement of wildlife species through the Wildhorse Agricultural Buffer. Additionally, as detailed under Impact 4.3-17, which starts on page 4.3-81 of the Draft SEIR, land cover conversion fees in effect at the time of payment would be applied for the proposed project's land cover impacts, in accordance with Yolo HCP/NCCP guidelines, including conversion of Yolo HCP/NCCP land covers within the Wildhorse Agricultural Buffer. Thus, the Draft SEIR adequately evaluates the potential impacts of the proposed obstacle course, including those related to the Wildhorse Agricultural Buffer.

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 13-5

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration. In addition, please see Response to Comment 13-4.

Response to Comment 13-6

Please see Response to Comment 12-4.

Response to Comment 13-7

As discussed under Impact 4.1-3, which starts on page of 4.1-18 of the Draft SEIR, the proposed project would include a 20-foot-wide tree buffer along the western and northern site boundaries. The buffer would include new tree plantings, which would shield light trespass from vehicle headlights within the project site onto existing residences to the west of the project site.

With respect to potential impacts related to transportation noise, as discussed under Impact 4.4-2 of the Draft SEIR and summarized in Table 4.4-10 on page 4.4-24, the increase in traffic noise levels attributable to the proposed project under Existing Plus Project conditions would be below the applicable increase significance criteria. Additionally, all project roadways and parking features would be designed in compliance with the applicable standards established by the City of Davis, ensuring such features are properly setback from existing residences to the west of the project site.

With respect to potential impacts related to exhaust, as discussed under Impact 4.2-3, which starts on page 4.2-47 of the Draft SEIR, localized concentrations of carbon monoxide (CO) are related to the levels of traffic and congestion along streets and at intersections. As detailed on page 4.2-38 of the Draft SEIR, given the absence of applicable CO standards established by YSAQMD, the Placer County Air Pollution Control District's (PCAPCD) screening thresholds were used. According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day. According to the modeling performed for the proposed project, the Proposed Project Scenario would result in maximum unmitigated operational mobile source CO emissions of 89.4 lbs/day, which is a reduction of 11.6 lbs/day as compared to the 101 lbs/day of operational mobile source CO emissions that would be generated by the Approved Conditions Scenario. Consequently, CO emissions related to mobile sources associated with operation of the proposed project would be below the 550 lbs/day screening threshold used by PCAPCD and would not exceed those anticipated for the Wildhorse Ranch Project.

Based on the above, the analyses and conclusions of potential impacts related to light and glare, noise, and exhaust from on-site vehicle circulation in the Draft SEIR are adequate.

Response to Comment 13-8

Please see Response to Comment 13-7.

Response to Comment 13-9

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Letter 14

From: b mc <be-mac@pacbell.net>
Sent: Monday, September 23, 2024 4:15 PM
To: Eric Lee <ELee@cityofdavis.org>
Subject: Palomino Place Project Draft SEIR (SCH# 2007072020)

Mr. Lee,

14-1 I am a concerned resident of Wildhorse who lives on Caravaggio Drive adjacent the former Duffel ranch. My comments on the Palomino Place Project Draft SEIR include the following:

14-2 The Hazards and Hazardous Materials section does not address arsenic and other constituents of concern (COCs) commonly found on agricultural lands. As the original homeowner, I visited this area in 2000 prior to construction and build-out of homes along Caravaggio Drive and recall that the agricultural land where our homes are now, extended well into the current property of the former Duffel ranch. The California Department of Toxic Substances Control has published various guidelines for sampling of former agricultural lands for COCs in soils. Please address this in the SEIR.

14-3 The Aesthetics section does not adequately address mitigation of light and noise sources from the proposed development onto the existing homes along Caravaggio Drive. Please address this.

14-4 I also have general concerns about land-lease arrangements and would like to see provisions to prevent large institutional investors from acquiring ownership of the proposed units. Such ownership often causes many negative impacts on a community.

Thank you.
Brian McAloon

LETTER 14: BRIAN MCALOON

Response to Comment 14-1

The comment is an introductory statement and introduces concerns that are detailed further in subsequent comments. Please see Responses to Comments 14-2 through 14-4. As detailed therein, the analyses and conclusions of the Draft SEIR are adequate.

Response to Comment 14-2

Contrary to the comment, as discussed on page 4.7-11 in Chapter 4.7, Other Effects, of the Draft SEIR, according to the Phase 1 Environmental Site Assessment and Limited Pesticide Assessment Report prepared for the currently proposed project by Geocon (see Appendix J of the Draft SEIR), soil sampling was conducted on-site in accordance with applicable U.S. Environmental Protection Agency (USEPA) standards, and organocholorine pesticides (OCPs) associated with past agricultural use were detected below the applicable environmental screening levels (ESLs). Although arsenic was detected at concentrations above the residential ESL, the reported arsenic concentrations are representative of naturally occurring background levels, and Geocon determined the concentrations of arsenic within on-site soils would not be an environmental concern. Thus, the analyses and conclusions under Section 4.7.5, Hazards and Hazardous Materials, of the Draft SEIR are adequate.

Response to Comment 14-3

As discussed under Impact 4.1-3 in Chapter 4.1, Aesthetics, of the Draft SEIR, all exterior lighting installed as part of the proposed project would be designed consistent with General Plan Policy UD 3.2, ensuring shielding fixtures are installed in such a manner as to prevent direct rays from passing property lines or into the public right-of-way. In addition, new lighting would be required to comply with the City's Outdoor Lighting Control Ordinance, which provides standards for outdoor lighting to minimize light pollution, glare, and light trespass. The currently proposed project would be subject to Mitigation Measures 4.7-2(a) and 4.7-2(b), which require submittal and City approval of a lighting plan and a street lighting plan and would ensure compliance with General Plan Policy UD 3.2 and the City's Outdoor Lighting Control Ordinance to reduce potential impacts related to light and/or glare on existing residences to a less-than-significant level. Thus, the analyses and conclusions in the Aesthetics chapter of the Draft SEIR are adequate.

Response to Comment 14-4

The comment does not address the adequacy of the Draft EIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

MEMO

TO: Dara Dungworth, Principal Planner
Eric Lee, Senior Planner
FROM: Greg Rowe, 2024 Chair – Davis Planning Commission
RE: Questions & Comments – Palomino Place Transportation Impact Study (TIS)
DATE: 7 September 2024

15-1 This memo presents questions and comments related to the Transportation Impact Study (TIS) and the corresponding sections in the Draft Subsequent EIR (DSEIR). It is of concern that the TIS does not explicitly explain how explain how its calculations were made, as noted below in section 6 of this memo. The reader is left to figure it out.

1. OVERVIEW

a. Commute Assumptions: The project description[1] says the project "…will create housing opportunities for many who currently commute into Davis for work and school but who live in neighboring jurisdictions due to the lack of available housing in Davis and the high cost associated with the existing supply." It is further stated on page 5-2 of the DSEIR that "…Objective #6 of the proposed project is to help address climate change by increasing housing opportunities for those currently commuting to and from Davis for work."[2]

15-2 b. Comment: The transportation analysis appears to be based on the assumption that most of the project residents will both live and work in Davis, thereby reducing VMT. This may not be an accurate assumption, especially in dual/multiple worker households. Many people live in or move to Davis simply because they like the town, but commute long distances to jobs elsewhere in the Sacramento region or Bay Area. For example, a nearby home was recently purchased by new owners. One spouse works for a company in downtown San Francisco, and the other is a physician at a Sacramento hospital. They moved to Davis simply because they like the city, not because either of them work here. They both have commutes outside Davis (although the spouse employed in San Francisco only goes there one or two days per week).

15-3 c. Comment: The DSEIR states that several CAAP actions and City actions will facilitate the use of alternative transportation modes within the City, and that the proposed project would include improvements (signage, traffic calming, etc.) to the City's bike and pedestrian network (DSEIR p. 4.2-65). **But, just because biking and walking facilities are provided does not mean that people will necessarily use them to a significant degree** (especially during hot weather), particularly if a significant number of project residents commute outside Davis for work.

15-4 d. Emerging Transportation Technologies: The DSEIR correctly summarizes new technologies and trends that may affect travel mode choices, and therefore the inputs and accuracy of

[1] Dated 23 January 2024
[2] Also see DSEIR page 6-2 regarding the project's objectives; i.e., opportunities to reduce travel by living in Davis.

Letter 15
Cont.

2 Memo – Palomino Transportation Impact Study

transportation models.[3] One of the post-COVID trends observed in many areas is the decline in transit use, apparently because people don't want to be exposed to transmissible airborne illnesses in densely packed transit vehicles. (This is affirmed on page 26 of the TIS.)

15-4 Cont.

i. Comment: This trend calls into question assumptions about transit use by the project's residents. Driving alone in a vehicle is still perceived by many people to be both more convenient and healthier. Driving alone also delivers the driver precisely to their destination; i.e., there is no walk involved after getting off a bus or rail car.

2. **POTENTIAL PERCEPTION PROBLEM**: VMT and LOS are seemingly at odds with each other. The average commute driver does not perceive or care about VMT if he is stuck in traffic; i.e., as VMT goes up, LOS is degraded.

15-5

a. VMT measures how much actual vehicle traffic a project would create. It helps describe the environmental consequences of land use and transportation network decisions, but provides no indication to the average commuter how his/her commute time will be impacted.
b. LOS instead describes the traffic operation effects of a project; i.e., it measures traffic congestion, which is the dynamic most easily perceived and meaningful to commuters.

3. **ENVIRONMENTALLY SUPERIOR ALTERNATIVE (ESA)** – Questions and Concerns[4]
   a. The 175 units assumed in the project are expected to generate 450 residents,[5] or 2.57 residents/unit. The DESIR confirms 2.57 is the average Davis residential density per unit.
   b. The ESA would have 85 more residential units (up from 175 to 260), an increase = 48.57%.
   c. The ESA implicitly assumes that VMT per capita will increase with higher density.
   d. The ESA assumes there will be a transit center in the SW corner of the site.

15-6

   e. Question: The TIS states on page 21 that outlying areas of Davis (Mace Ranch, South Davis) have higher per capita VMT (33-36) than central Davis and Old East Davis (25-27). As an "outlying" (peripheral) project, the proposed project's estimated VMT per capita is 33. As such, **how can it realistically be assumed that simply "densifying" the project will significantly reduce anticipated VMT, when data shows that existing outlying areas in Davis have relatively high VMT per capita?**
      i. Suggestion: The TIS should explicitly explain how and why densifying a peripheral project will positively impact VMT per capita.

15-7

   f. Question/Comment: The DSEIR assumes the 175 units will generate 450 residents, or 2.57 residents/unit. If there are 260 units (increase of 85 units), it would be reasonable to assume this would generate 668 residents (an increase of 218 residents, or 48%, based on 2.57 residents/ unit). It is intuitively obvious that adding 218 more residents would worsen LOS, but it also poses this question: **How would adding 218 residents to the proposed project reduce VMT? Please explain how this mechanism works.**

[3] See pages 4.6-8 through 4.6-10.
[4] See DSEIR discussion starting on page 6.16
[5] DSEIR, pg. 5-1.

Letter 15
Cont.

3 Memo – Palomino Transportation Impact Study

4. **ANALYSIS OF PROPOSED MITIGATION MEASURES**
   a. Subsidized or Discounted Transit Fares[6] For Residents of 45 Affordable Units: It states here and in the Transportation Impact Study[7] that prior to project occupancy, the project applicant shall provide free transit passes to affordable unit residents.
      i. Questions:
         1. What will be the duration of this obligation?
         2. For how long will the passes last? If they renew annually, a concern would be that the applicant (J. David Taormino) is in his mid-70s, so who will provide annual passes when he is no longer alive?
            a. Will the applicant be required to post a bond or some other financial mechanism to ensure that the passes are funded in perpetuity?
            b. Will the Development Agreement or Conditions of Approval specify that the obligation to provide free or discounted transit passes would transfer to a different entity at such time the applicant is no longer present? For example, would this become a responsibility of the Homeowners Association (HOA)?

15-8

         3. New residents: if a resident of an affordable unit moves, will the new occupant get the free passes, or is this just a "one-time" mechanism?

15-9

   b. CarShare Program:[8]
      i. Questions:
         1. How long will this obligation last?
         2. Who will maintain the vehicles?
         3. Who will be responsible for replacing the vehicles when they wear out?

15-10

5. **INEFFECTIVNESS OF PROPOSED TRANSPORTATION DEMAND MANAGEMENT (TDM) STRATEGIES**: TDM methods typically require a great deal of administrative coordination and oversight (basically because getting people to change their innate behavior inclinations is difficult). The result is not very much "bang for the buck". As noted on page 5-8 of the DSEIR: "Altogether, the TDM strategies described in Mitigation Measure 4.6-4 would reduce project-generated residential VMT per capita by [just] **2.72 percent,** for a total residential VMT per capita of 32.1, or 6.6 percent and 47.9 percent above baseline local and regional residential VMT per capita averages, respectively.

15-11

   Therefore, **even with mitigation measures, project-generated residential VMT per capita would remain more than 15 percent below baseline local and regional residential VMT per capita averages, and the impact would remain significant and unavoidable."** (See also Transportation section on DSEIR page 6-10, in which it is stated: "However, even with implementation of the new mitigation measure, the project's VMT per capita would exceed the applicable thresholds of significance. Therefore, impacts would remain significant and unavoidable.")

[6] DSEIR, Measure 4.6-4, pages 4.6-34 thru 4.6-35.
[7] Transportation Impact Study, page. ___
[8] DSEIR, page 4.6-35

Letter 15
Cont.

4 Memo – Palomino Transportation Impact Study

6. PALOMINO PLACE TRANSPORTATION IMPACT STUDY (TIS) – COMMENTS AND SUGGESTIONS

This document could be improved if it explained how calculations were made (i.e., "show your work)." I had to perform the following calculations to determine how the data in Table 7 (page 46) was derived. Math is not my strong suit, so my methods were laborious. Perhaps these numbers are better explained in the F&P "Local Transportation Analysis," but that document is over 300 pages in length, which could dissuade many readers. The TIS should in any case provide an explanation of the calculations.

15-12

a. Baseline City of Davis Average: To derive the Significance Threshold, I first had to multiply the current VMT per capita of 30.1 by 15% (0.15), which produces 4.515. I then had to subtract 4.515 from 30.1 to derive the significance level of 25.6. As with the other calculations described below, t**he TIS should have explained how 25.6 was derived.**

15-13

b. Project Residential Component Compared to Baseline Davis Average: I initially could not figure out how "+9.7%" was determined. I ended up subtracting 30.1 from 33.0, which produces 2.9. I then divided 30.1 by 2.9, which produces 9.63% (which Fehr & Peers evidently rounded to 9.7%). Again, the TIS should have explained this math.

15-14

c. Baseline SACOG Region Average: I multiplied 21.7 by 0.15, yielding 3.255. I then subtracted 3.255 from 21.7 to derive the 18.4 shown in the Significance Threshold column.

15-15

d. Project Residential Component compared to SACOG Region Average: I subtracted 21.7 from 33.0, which produced 11.3. Then, I divided 11.3 by 21.7 to obtain 52.07% (evidently rounded to 52.6% by Fehr & Peers).

15-16

e. Threshold Required to Meet Significance Threshold: This befuddled me at first. I am still not sure how the 22.5% was determined, but realized that: for the City of Davis, multiplying the project residential component of 33.0 by 0.225 produces 7.425, and that subtracting 7.425 from 33.0 results in 25.575 (which F&P evidently rounded to the 25.6 shown in the Significance Threshold column). For the SACOG Region Average, multiplying the project component of 33.0 by 0.443 results in 14.619, and subtracting this from 33.0 produces 18.381 (rounded to 18.4 by the model used by F&P). However, I still don't know how negative "44.3%" was derived.

/Users/gregrowe/Documents/Planning Commission/Meeting Packets/2024 Packets/Sept 11/Rowe_Memos-Comments/Trans Impact Study(1)09-07-2024.docx

LETTER 15: GREG ROWE

Response to Comment 15-1
The comment is an introductory statement and does not address the adequacy of the Draft SEIR.

Response to Comment 15-2
The Draft SEIR's VMT analysis does not make any assumptions regarding the number of project residents that would both live and work in Davis, as doing so would be speculative. The Draft SEIR's VMT analysis uses the SACOG SACSIM19 travel demand model. SACSIM19 is a sophisticated activity-based model that simulates the typical weekday travel activity of individual people in the six-county SACOG region, including the City of Davis. SACSIM19 utilizes a variety of transportation system, socioeconomic, land use, and travel behavior inputs to simulate individual travel tours, which can, in turn, be used to produce VMT and other transportation performance metrics. SACSIM19 is the best and only model available for the purposes of regional-level VMT analysis, such as that required in the Draft SEIR. Please refer to the SACOG's June 2020 User Guide and Model Documentation for SACSIM19 for additional information.[11]

Response to Comment 15-3
Pages 4.6-20 through 4.6-23 and Table 4.6-3 of the Draft SEIR summarize the methods and results of the project trip generation estimates, including the number of trips anticipated to be generated by the proposed project's residential component that would walk, bike, and use transit. Trips generated by the proposed residential component would be associated with a variety of trip purposes, including, but not limited to, work commute, school, shopping, and recreational travel.

The residential component of the proposed project would generate an estimated 58, five, and six walk, bike, and transit trips during the weekday (daily) AM peak hour and PM peak hour, respectively. The foregoing trip totals represent less than 5 percent of the total raw external vehicle trips that would be generated by the proposed residential component during each time period. While some project residents would utilize available nearby transit services and the surrounding active transportation network, the foregoing results indicate that the vast majority of trips generated by the proposed residential component would be completed by automobile.

This comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 15-4
Please see Response to Comment 15-3.

Response to Comment 15-5
The comment does not address the adequacy of the Draft SEIR and has been noted for the record. It should be noted that a separate, non-CEQA LTA was prepared by Fehr & Peers and will be used by the City to review the project's consistency with General Plan LOS goals and policies.

[11] Sacramento Area Council of Governments. *User Guide and Model Documentation for SACSIM19*. Available at: https://www.sacog.org/home/showpublisheddocument/1510/638355527088370000. Accessed October 2024.

Response to Comment 15-6

Please see the Master Response.

Response to Comment 15-7

Please see the Master Response.

Response to Comment 15-8

The comment pertains to Mitigation Measure 4.6-4, which requires the project applicant to implement several TDM strategies to reduce the number of vehicle trips that would be generated by the project's residential component. Subsection 1 requires the applicant to provide discounted/free transit passes to the occupants of the 45 multifamily units. This obligation is intended to be for the life of the affordable units. The provision of transit passes will be an obligation that is transferred to the affordable housing developer and management company upon transfer of ownership. As such, the project applicant's age is not relevant, but noted. No bond will be required, as the obligation will be imposed as an ongoing condition of approval that will be recorded against the lot. As previously indicated, the requirement will be recorded against the multi-family lot and the obligation will run with the land.

Nonetheless, to provide that the requirement must be met "concurrent with the occupancy of each multi-family residential unit," as not all tenants would move in on day one, and it may be difficult to provide discounted passes to all residents before they move in, Mitigation Measure SEIR 4.6-4 is hereby revised as follows:

> *SEIR 4.6-4* *The project applicant shall implement the following TDM strategies to reduce the number of vehicle trips that would be generated by the project residential component, subject to review and approval by the City Engineer. The timing for each strategy is set forth below:*
>
> 1) ***Implement subsidized or discounted transit program (CAPCOA Handbook Strategy T-9)*** *– This measure would provide subsidized or discounted, or free transit passes for residents of the project's 45 affordable housing dwelling units. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT.*
>
> ~~*Prior to occupancy of the*~~*Concurrent with the occupancy of each multi-family residential unit*~~s~~*, the project applicant shall provide free transit passes to residents of the project's 45 affordable housing dwelling units. According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.16 percent.*

The foregoing revisions are for clarification purposes only, and do not affect the conclusions of the Draft SEIR.

Response to Comment 15-9

The comment asks how discounted/free transit passes would be distributed/administrated during the life of the project. In addition to including this requirement in conditions of approval that would be recorded against the property, the City will be requiring the multi-family affordable housing

developer to enter into regulatory agreements to ensure the long-term affordability of the 45 multifamily units, which will provide an opportunity for the City to negotiate the specifics of this TDM strategy to ensure effective operations. As currently proposed, transit passes would be provided as a condition of entering into a lease for a multifamily unit and would be surrendered upon the termination of the lease.

Response to Comment 15-10

This comment also pertains to Mitigation Measure 4.6-4, which requires the project applicant to implement several TDM strategies to reduce the number of vehicle trips that would be generated by the project's residential component. Subsection 2 requires the project applicant to "increase carshare access in the project site by deploying conventional carshare vehicles." This obligation would be imposed for the life of the subdivision and would pertain to all future residents of Palomino Place. As proposed, the homeowner's association (HOA) would be responsible for managing a contract with a car share service provider. That service provider would be responsible for maintaining and replacing vehicles, and the HOA would merely contract for the service.

Response to Comment 15-11

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Response to Comment 15-12

In response to the comment, Table 4.6-4 on page 4.6-33 of the Draft SEIR is hereby revised, as follows:

Table 4.6-4
Project Residential Component Weekday Residential VMT per Capita

Scenario	Residential VMT per Capita[1]	Significance Threshold (15 percent Below Existing Average)	Project Residential Component Compared to Baseline Average	Project-Generated Residential VMT per Capita Reduction Required to Meet Significance Threshold
Project Residential Component	33.0	--	--	--
Baseline City of Davis Average	30.1	25.6[2]	+9.7%[4]	-22.5%[6]
Baseline SACOG Region Average	21.7	18.4[3]	+52.6%[5]	-44.3%[7]

[1] Estimated using the SACOG SACSIM19 travel demand model.
[2] Represents the VMT significance threshold for the City of Davis, which is 85% of the baseline City of Davis residential VMT per capita average. Calculated as follows: 30.1 residential VMT per capita x 0.85 = 25.6 residential VMT per capita.
[3] Represents the VMT significance threshold for the SACOG Region, which is 85% of the baseline SACOG Region residential VMT per capita average. Calculated as follows: 21.7 residential VMT per capita x 0.85 = 18.4 residential VMT per capita.

[4] Represents the percentage difference between the project-generated residential VMT per capita and the baseline City of Davis residential VMT per capita average. Calculated as follows: 33.0 residential VMT per capita ÷ 30.1 residential VMT per capita – 1 = 9.7%.
[5] Represents the percentage difference between the project-generated residential VMT per capita and the baseline SACOG Region residential VMT per capita average. Calculated as follows: 33.0 residential VMT per capita ÷ 21.7 residential VMT per capita – 1 = 52.6%.
[6] Represents the project-generated residential VMT per capita reduction necessary to fall below the City of Davis significance threshold. Calculated as follows: (33.0 residential VMT per capita – 25.6 residential VMT per capita) ÷ 33.0 residential VMT per capita = -22.5%.
[7] Represents the project-generated residential VMT per capita reduction necessary to fall below the SACOG Region significance threshold. Calculated as follows: (33.0 residential VMT per capita – 18.4 residential VMT per capita) ÷ 33.0 residential VMT per capita = -44.3%.

Source: Fehr & Peers, 2024.

The foregoing revisions are for clarification purposes only, and do not affect the analyses or conclusions of the Draft SEIR.

Response to Comment 15-13

Please see Response to Comment 15-12.

Response to Comment 15-14

Please see Response to Comment 15-12.

Response to Comment 15-15

Please see Response to Comment 15-12.

Response to Comment 15-16

Please see Response to Comment 15-12.

Letter 16

-----Original Message-----
From: greg rowe <greglrowe51@gmail.com>
Sent: Sunday, September 15, 2024 9:06 PM
To: Eric Lee <ELee@cityofdavis.org>
Cc: Dara Dungworth <DDungworth@cityofdavis.org>
Subject: Public Comment - Palomino Place DSEIR

Hi Eric,

This is a public comment on the draft Subsequent EIR for the proposed Palomino Place project.

After reading the environmental document, I suggest that a different alternative development scenario warrants examination by the City. Given that the Environmental Superior Alternative reduces per capita Vehicle Miles Traveled (VMT) below the required threshold, this alternative deserves consideration by the City. However, given the uncertain funding and development status of the proposed Pentathlon Training Center, the "no training center" alternative also warrants further consideration.

16-1

I therefore suggest that a hybrid development scenario that combines these alternatives should be considered. That is, combine the higher density of the Environmentally Superior Alternative with the alternative that excludes the training center. In this scenario, the training center site would be replaced with additional housing, yielding a slight increase over the 260 housing units contemplated in the Environmentally Superior Alternative. This approach would achieve most of the project objectives while lowering VMT and producing more of the housing that is needed in Davis.

This alternative could be presented to the Planning Commission in the form of a vesting tentative map that eliminates the training center, and replaces it with affordable housing at the proposed training center site.

Thank you for considering my comments.

Regards,

Greg Rowe

LETTER 16: GREG ROWE

Response to Comment 16-1

The comment's suggestion for a combined hybrid alternative of the Increased Density Alternative and No Pentathlon Facility Alternative is acknowledged. However, the Draft SEIR already includes evaluation of a reasonable range of four project alternatives. While the suggested alternative may have merit as a planning consideration, the recommended alternative does not necessarily have added value from a CEQA perspective, because the suggested alternative would not be expected to further avoid any of the project's significant environmental impacts.

Additionally, it should be noted that the Draft SEIR's analysis of project alternatives is consistent with CEQA Guidelines Section 15126.6(a), which establishes that the primary intent of an EIR's alternatives evaluation is to "[…] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." To this end, the Draft SEIR includes evaluation of four alternatives and provides sufficient information about each alternative to allow for meaningful evaluation, analysis, and comparison with the currently proposed project. Thus, the Alternatives Analysis chapter of the Draft SEIR is adequate.

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

Letter 17

From: greg rowe <greglrowe51@gmail.com>
Sent: Monday, September 16, 2024 10:30 AM
To: Eric Lee <ELee@cityofdavis.org>
Cc: Dara Dungworth <DDungworth@cityofdavis.org>
Subject: Another Palomino Public Comment
Importance: High

Dear Eric,

Based on four decades of CEQA experience, I have significant doubts about the accuracy of the transportation models used for the proposed Palomino Place project. As the transportation consultant readily conceded during the Planning Commission's September 11 meeting, it is impossible to know for certain what traffic volume, driver habits and per capita VMT resulting from the project will be until many years later after the project is fully "built out." The project applicant even expressed his concerns about the modeling results, conveying that he had nothing to do with the models and was not consulted on the assumptions used.

17-1 Of concern is the fact that apparently transportation planners and consultants don't go back and test the accuracy of their assumptions and models after a project is completed. A number of years ago I asked a transportation consultant whether they ever return to a completed project to compare actual traffic patterns against the models they ran during the project's planning stages. (The consultant may in fact have been Fehr & Peers.). The consultant's response was that they knew of no instance in which transportation models were subsequently tested against a project's "real world," as built conditions (presumably because such consultants don't get paid to do so).

Given the absence of such benchmarking, I think it would be prudent for the City to take the results of the transportation modeling results for this project "with a grain of salt." The potential ramifications of actual traffic conditions varying even to a modest degree from the modeling output are too important for the City, the applicant, future residents of Palomino Place, and drivers in the project's vicinity. This concern equally applies to the other projects proposed for the East Covell - Mace Boulevard corridor.

17-2 Moreover, the City should ask the transportation consultant for evidence that demonstrates the accuracy of the models used when compared to actual conditions after project completion.

Thanks for considering my comments.

Greg Rowe

LETTER 17: GREG ROWE

Response to Comment 17-1

The commenter's concerns are noted for the record. Acknowledging the reality that modeled projections of future project-generated traffic patterns are, in fact, only projections, should not be conflated with a lack of adequacy in the methodology employed to make such projections.

In the case of the modeling completed by Fehr & Peers as part of the TIS (see Appendix H of the Draft SEIR), the methodology employed therein is consistent with the recognized approaches that are employed by transportation consultants within the Sacramento region. As detailed in the Method of Analysis section of the Transportation chapter, which starts on page 4.6-19 of the Draft SEIR, the trip generation estimates for the residential component of the proposed project were derived from daily trip rates published in the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 11th Edition (2021). The non-residential components' trip generation estimates were quantified based on guidance provided by the ITE Trip Generation Handbook, 3rd Edition (2017).

With respect to VMT, the SACOG SASCIM19 travel demand model was utilized as part of the TIS to derive VMT estimates for the proposed project. The SACSIM19 model is a sophisticated activity-based model that predicts the travel demand and travel patterns for residents, workers, students, visitors, and commercial vehicles throughout the SACOG region, including Davis. SACSIM19 utilizes a variety of transportation system, socioeconomic, land use, and travel behavior inputs to simulate individual travel tours, which can, in turn, be used to produce VMT and other transportation performance metrics. Please refer to SACOG's June 2020 User Guide and Model Documentation for SACSIM19 for additional information.[12]

Other VMT impact analysis methods were considered but dismissed for use in the Draft SEIR. Use of the local City of Davis/UC Davis travel demand model was considered but dismissed because the model only includes land uses and transportation facilities within the City of Davis and on the UC Davis campus, and thus would not be appropriate for the comparative regional analysis required for the Draft SEIR VMT impact analysis. Use of "big data" sources such as StreetLight Data or Replica were considered but dismissed because these data sources represent existing travel conditions only, and therefore cannot be used to forecast VMT associated with future changes to land use patterns or the transportation system as necessary for quantitative VMT impact analysis. Ultimately, the SACSIM19 travel demand model was identified as the best and most appropriate tool for the Draft SEIR VMT impact analysis.

The City of Davis Traffic Engineer and project transportation consultant, Fehr & Peers, are respective experts in the use of the above-described traffic modeling methods and are confident that the results for the Palomino Place Project can be relied on for impact determination purposes, pursuant to CEQA.

Response to Comment 17-2

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration. Please see Response to Comment 17-1.

[12] Sacramento Area Council of Governments. *User Guide and Model Documentation for SACSIM19*. Available at: https://www.sacog.org/home/showpublisheddocument/1510/638355527088370000. Accessed October 2024.

From: Scott Steward <scottsteward@posteo.net>
Sent: Sunday, September 8, 2024 3:50 PM
To: Eric Lee <ELee@cityofdavis.org>
Cc: Gloria Partida <GPartida@cityofdavis.org>
Subject: RE: Palimino - more unobtainable homes that locals can't afford. - -please transition

Dear Eric,

I appreciate the need for more housing in Davis, and yet the Palimino plan is set up for 1/2 of its land to be obtainable to only senior tenure professors and out-of-town tech millionaires.

The new realities of home unaffordability require that there be at least twice the multifamily solutions in the property and appreciably more open space surrounding those high-density units.

18-1

I see this plan development and the one for the Shriners to be as troubling as the recently withdrawn Village Farms project. We continue to serve the wealthy with large homes that are unobtainable for those looking for housing here serving in Davis with "local" incomes.

Please help our development community in the necessary transition to see beautiful, multigenerational, multifamily-gardened communities.

Thank you for your consideration.

Scott Steward
Davis, CA

LETTER 18: SCOTT STEWARD

Response to Comment 18-1

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

From: Richard Tsai <davirtt@gmail.com>
Sent: Tuesday, September 3, 2024 8:13 PM
To: Eric Lee <ELee@cityofdavis.org>
Cc: Gloria Partida <GPartida@cityofdavis.org>
Subject: comment & question regarding Palomino Place Project Draft SEIR August 2024

Hi Eric,

I have some comments and clarification questions regarding section 4.6 Transportation of Palomino Place Project Draft SEIR August 2024:

19-1 - It is stated in the Draft SEIR that the City of Davis has not adopted VMT procedures and standards. Are there plans in place for the City of Davis to adopt VMT procedures and standards to comply with SB 743 which became effective on 7/1/2020 (we are 4 years past that effective date now)?

- does the VMT estimates obtained from SACOG for analysis in this SEIR take into account the following?

19-2 1. 2009 Wildhorse EIR was prior to technological advances such as WAZE, which route traffic from Solano County to Mace Blvd/I-80 via eastbound Covell Blvd during peak traffic hours.
2. increased residential traffic in/out of Palomino Place may impact eastbound Covell Blvd during peak traffic hours and potentially impact the following intersections: Covell Blvd and Pole Line Road, Covell Blvd and Cannery Road, Covell Blvd and F Street.

19-3 It is my recommendation that City of Davis adopt its own VMT procedures and standards and provide thorough analysis of impacts of residential traffic in/out of Palomino Place Project and therefore its impact to peak traffic hours on eastbound Covell Blvd prior to moving forward on section 4.6 of this SEIR.

respectfully submitted,
Richard Tsai
Wildhorse resident

LETTER 19: RICHARD TSAI

Response to Comment 19-1

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

It should also be noted that while the City of Davis has not yet adopted VMT procedures or standards, as discussed on page 4.6-19 of the Draft SEIR, the VMT analysis within the Draft SEIR relies on guidance from the OPR Technical Advisory, published in December of 2018 to provide advice and recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

Response to Comment 19-2

The Draft SEIR's analysis of project-generated VMT relies upon the SACOG SACSIM19 travel demand model. Please see pages 4.6-8 through 4.6-11 of the Draft SEIR for a discussion of the limitations of the SACSIM19 model with respect to capturing the effects of emerging transportation trends and technologies, including the Waze GPS traffic app and other navigation apps.

Item 2 in the comment does not address the adequacy of the Draft SEIR. Project effects on intersection vehicle delay, traffic congestion, or similar measures are related to LOS. Please see Response to Comment 7-1.

Response to Comment 19-3

Please see Responses to Comments 7-1 and 19-1.

Letter 20

From: Georgina Valencia <georginacvalencia@gmail.com>
Sent: Saturday, August 24, 2024 11:58 AM
To: Eric Lee <ELee@cityofdavis.org>
Subject: RE: Comment for the Record - Palomino Place (formerly Wildhorse Horse Ranch) | City of Davis, CA

TO: Eric Lee

FR: Georgina Valencia, Broker/Consultant Valencia Real Estate
Current Planning Commissioner
Former Social Services Chair

RE: VMT Consideration for the project Palomino

Our town, council and staff should consider the variables wrapped around VMT and whether increased or high density of a project predicts reduced VMT. I am quoting from a study done (see citation link). As the study states there are many more issues that need to be considered when trying to reduce VMT. Just by increasing density alone you do NOT decrease VMT.

20-1 "Promoting the conviction that simply increasing the density of sporadic developments in a metropolitan region will achieve a reduction in travel is ill-founded. Travel seems strongly entangled not only with moldable physical attributes, such as density and land use, but also, importantly, with intractable factors, such as personal income, status, perceptions of freedom, household size, employment choice, and stage in life, to name a few. Usually bypassed, such factors, though they lie outside the realm of planning policy, could still inform planning in general by circumscribing its limits and by uncovering unforeseen opportunities." citation

Thank you,

Georgina Valencia
Broker/Owner
DRE #01044277 | ORE #201248961
3925 Yana Place | Davis, CA
Phone: (916)802-8044

LETTER 20: GEORGINA VALENCIA

Response to Comment 20-1

Please see the Master Response.

The comment references an article that summarizes three separate research papers on travel behavior and/or VMT. Upon review of the article and each of the three research papers, none present information regarding project-generated residential VMT per capita, the specific VMT metric used to evaluate the project residential component in the Draft SEIR. To re-iterate, residential VMT per capita is a specific VMT metric that represents the rate of VMT generated by each resident (i.e., the total distance driven on a per resident basis).

The first research paper, entitled Defining Suburbs: How Definitions Shape the Suburban Landscape, presents information comparing car commute mode share between lower-density suburbs and higher-density cities. Car commute mode share is not a VMT metric and commute mode share data does not provide a complete picture of residential VMT per capita, because it does not address the number and distance of vehicle commute trips generated per resident and lacks information regarding non-commute travel activity altogether (e.g., shopping, school, recreation, etc.). It should be noted that the paper finds that car commute mode share is nine to 19 percent higher for lower-density suburbs compared to higher-density cities.

The second research paper, entitled Testing Newman and Kenworthy's Theory of Density and Automobile Dependence, presents information comparing total vehicle kilometers traveled (VKT) for major cities in the U.S., Canada, and Europe with varying population density levels. The research is focused on total VKT within each city which, like total VMT, includes all residential and non-residential vehicle travel activity. For the major cities studied in this paper, total VMT would likely include a considerable amount of tourist travel activity, travel activity associated with regional/international business hubs, and other non-residential travel activity that has little to no bearing on residential VMT per capita. Thus, the findings of this paper should not be interpreted to reveal trends regarding varying population densities and their associated residential VMT per capita.

The third research paper, entitled Comparing Canadian New Urbanist and Conventional Suburban Neighbourhoods, presents information comparing a variety of travel and built environment factors for cities in Canada with varying population density levels. These factors include total VKT and VKT per household (which can be converted to total VMT and VMT per household). For the reasons described above, total VMT should not be used to reveal trends regarding residential VMT per capita. VMT per household is a VMT metric that can be similar to VMT per capita; however, it is not clear if VMT per household in the paper represents a ratio (total VMT divided by total household) or a rate (residential VMT generated per household, a method similar to that used to calculated residential VMT per capita). It should be noted that the paper finds that VMT per household is 24 percent higher for lower-density areas compared to higher-density areas.

This comment will be forwarded to the decision-makers for their consideration.

Letter 21

From: Georgina Valencia <georginacvalencia@gmail.com>
Sent: Tuesday, September 17, 2024 1:36 PM
To: Eric Lee <ELee@cityofdavis.org>
Subject: RE: Comment for the Record - Palomino Place (formerly Wildhorse Horse Ranch) | City of Davis, CA

TO: Eric Lee

FR:
Georgina Valencia, Broker/Consultant Valencia Real Estate
Current Planning Commissioner
Former Social Services Chair

RE: 1. VMT Consideration for the project Palomino
2. Affordable Housing

21-1

1. Our town, council and staff should consider the variables wrapped around VMT and whether increased or high density of a project predicts reduced VMT. I am quoting from a study done (see citation link). As the study states there are many more issues that need to be considered when trying to reduce VMT. Just by increasing density alone you do NOT decrease VMT.

"Promoting the conviction that simply increasing the density of sporadic developments in a metropolitan region will achieve a reduction in travel is ill-founded. Travel seems strongly entangled not only with moldable physical attributes, such as density and land use, but also, importantly, with intractable factors, such as personal income, status, perceptions of freedom, household size, employment choice, and stage in life, to name a few. Usually bypassed, such factors, though they lie outside the realm of planning policy, could still inform planning in general by circumscribing its limits and by uncovering unforeseen opportunities." citation

21-2

2. Affordable Housing - Please reference the current City of Davis Housing Element 2021-2029 V3, Appendix A - starting on page 295. "2. Allocating HTF monies 2.1. The continuum of housing needs -The SSC recommends that the HTF be used to support **three broad groups of needs within the Davis community : 1) the unhoused; 2) prospective/current renters; 3) prospective home buyers**. Figure 1 below illustrates the overall continuum of housing needs. The housing trust fund is concerned with emergency shelters & transitional housing, permanent supportive housing, affordable rental housing, and affordable home ownership."

In order to support the 3 affordable housing groups outlined in the Housing Element I submit that each development that comes before SSC, Planning Commission and/or City Council should have a "housing plan" that includes measures to support the 3 groups outlined in the Housing Element, not just one group.

In the case of Palomino the only affordable housing proposed is rental housing. This covers only one group in the housing continuum. The other 2 groups (unhoused and

Letter 21
Cont.

21-2 Cont.

home buyers) could be addressed by a fee paid to the Housing Trust Fund for programs that would help the remaining 2 groups. The fee should be based on some % of the value of housing to be built or some other calculator that is consistent and predictable for the builder/developer.

If the City of Davis doesn't make a commitment to affordable housing support for the full continuum of housing needs, it may be that the City will be out of compliance with their requirements they have set forth in their own 2021-29 Housing Element.

Thank you,

Georgina Valencia Real Estate
Broker/Owner
DRE #01044277 | ORE #201248961
3925 Yana Place | Davis, CA
Phone: (916)802-8044

LETTER 21: GEORGINA VALENCIA

Response to Comment 21-1

Please see the Master Response and Response to Comment 20-1.

Response to Comment 21-2

The City would enforce its applicable affordable housing regulations, should the currently proposed project be approved. As detailed on page 3-16 of the Draft SEIR, the proposed 45 multi-family residences would be deed-restricted as affordable housing units and subject to a regulatory agreement, ensuring the project's compliance with the City's Affordable Housing Ordinance (Davis Municipal Code Article 18.05).

The comment has been noted for the record and will be forwarded to the decision-makers for their consideration.

City of Davis
Planning Commission Comments
Wednesday, September 11, 2024

Letter 22

Comments/Questions Regarding the Draft Subsequent Environmental Impact Report (SEIR)

Catherine Brinkley:

22-1 • Commenter asked if the proposed project still has to go up for a Measure JRD vote related to agricultural land because Builder's Remedy is being invoked.

22-2 • Commenter asked if there are additional VMT mitigation measure options.

22-3 • Commenter asked if unit counts for each project Alternative are provided in the Draft SEIR, and asked staff to provide a description of the Increased Density Alternative.

22-4 • Commenter asked if a microgrid was considered for a greenhouse gas (GHG) mitigation measure.

22-5 • Commenter asked if renewable energy was considered as part of the Increased Density Alternative analysis.

22-6 • Commenter asked a process-related question regarding if the developer were to move forward with a higher density alternative, what it would mean for the vested rights of the proposal as a Builder's Remedy project.

22-7 • Commenter noted that the VMT and transportation modeling can be trusted and are based on real-world conditions.

22-8 • Commenter asked about potentially changing the land use designation of the project site from Agriculture in the future as part of the General Plan Update.

Linda Deos:

22-9 • Commenter asked how higher density leads to reduced VMT.

22-10 • Commenter asked if electric vehicle charging spaces were included as a potential VMT mitigation measure.

22-11 • Commenter asked why the USA Pentathlon Training Facility and pool complex would reduce VMT.

22-12 • Commenter asked for clarification of homeowners association (HOA) maintenance responsibilities and asked who would maintain the proposed agricultural buffer.

22-13 • Commenter asked if the proposed project would be subject to parkland in-lieu fees.

22-14 • Commenter asked how zoning would work for a Builder's Remedy project.
  - Asked if permitted uses within the Agricultural zoning designation would be allowed.

22-15 • Commenter asked if the proposed project can still be challenged under CEQA because it is subject to Builder's Remedy.

Greg Rowe:

22-16 • Commenter asserted that the Increased Density Alternative would result in increased VMT due to additional residents.

22-17 • Commenter asked how VMT models consider how many drivers per unit exist within the City.

22-18 • Commenter asked how higher density residential units would result in reduced VMT.

22-18 Cont.
- Noted that the project site is located near developments with higher VMT.

22-19
- Commenter asked if the VMT model considers where people live and work, noting that people in the City travel outside the City for work.

22-20
- Commenter asked about the effectiveness of transportation demand management (TDM)-related mitigation measures, such as the provision of transit passes, and the need for the Final SEIR to include more detail on the implementation and duration of transit passes.
  - Commenter asked if all future residents of the proposed project would get a transit pass, even if they are not the first resident of the unit, and if the HOA would be required to provide the transit pass once all proposed units are sold.

22-21
- Commenter asked about the ability to choose and implement the Environmentally Superior Alternative.

22-22
- Commenter requested that Figure 6-1 of the Draft SEIR be revised to clarify that the stormwater pond is for detention.

22-23
- Commenter noted that Table 4.6-4 of the Draft SEIR related to project VMT is difficult to follow, and information should be provided describing how the numbers were derived.

22-24
- Commenter requested a financial feasibility analysis of the proposed USA Pentathlon Training Facility and pool complex, especially because Davis High School will also be building an aquatic center.

Michelle Weiss:

22-25
- Commenter asked if the Multi-Modal Transit Center included in the Increased Density Alternative was addressed in the VMT analysis.

22-26
- Commenter asked staff to explain the proposed pedestrian and bicycle infrastructure and intersection improvements.

22-27
- Commenter asked who would own the USA Pentathlon Training Facility and pool complex.

22-28
- Commenter asked about the first-time homebuyer's program described in the project's affordable housing plan narrative and wants to memorialize the commitment.

22-29
- Commenter asked why the transit center in the Increased Density Alternative is not a component of the proposed project or the other alternatives.

Vince McLaughlin:

22-30
- Commenter noted that the practical analysis would be total VMT, not VMT per capita, and that VMT analysis is speculative.

22-31
- Commenter asked how the Increased Density Alternative eliminates or reduces the significant and unavoidable impact related to VMT.

22-32
- Commenter asked staff about additional noticing time and asked if there has been discussion about extending the public comment period.

22-33
- Commenter asked about timing of Settlement Agreement dates and application processing.

22-34
- Commenter asked why only the USA Pentathlon Training Facility is subject to design review.

22-35
- Commenter asked why a four-way stop is recommended two miles away from the project site at County Road 102 and County Road 29.

22-36 • Commenter asked about potential issues with vehicle stacking at the project entry road leaving the project site in the morning.

22-37 • Commenter asked if there is a concern related to parking if the Increased Density Alternative is selected for development.

22-38 • Commenter stated that Builder's Remedy is a "bad law" because it disregards the General Plan and zoning, but noted that the City can work through it.

Alan Bennett:

22-39 • Commenter agreed that total VMT is a better analysis than VMT per capita.

22-40 • Commenter asked if there has been research on how community resources/amenities impact VMT.

22-41 • Commenter questioned the effectiveness of the SACOG VMT model and is not convinced that higher density results in lower VMT.

Albert Lin (Resident):

22-42 • Commenter noted concerns related to a loss of privacy, increased noise and light pollution, and aesthetic impacts that would result from the proposed project. Commenter stated that the Draft SEIR fails to adequately address such impacts and understates the City's ability to mitigate impacts, as the Settlement Agreement authorizes the City to include conditions of approval that would benefit residents of Davis.

22-43 • Commenter noted that existing residential units on Caravaggio Drive have shallow backyards, and enforcement of the proposed tree buffer is not practical, which could result in conflicts between neighbors. Commenter recommended a greenbelt instead of narrow lots and locating the proposed tree buffer on the existing residential lots on Caravaggio Drive.

22-44 • Commenter noted he will be submitting additional written comments on the Draft SEIR.

Brent Meyer (Resident):

22-45 • Commenter noted that the applicant agreed to deed 15 feet of property to the adjacent Caravaggio Drive property owners, with the caveat that two-story homes would be allowed adjacent to the project boundary. Commenter hopes to reach agreement with the applicant related to the buffer.

22-46 • Commenter stated that 260 units are too many and does not support the statement that high density residential units would decrease VMT. Commenter noted that the nearest grocery store is far away and, therefore, believes that the Increased Density Alternative would not reduce VMT.

22-47 • Commenter asserted that future residents of the proposed project would park in the existing adjacent neighborhood.

Phil Wiles (Resident):

22-48 • Commenter expressed concerns related to compatibility with the project site's Agricultural zoning designation.

22-49 • Commenter stated that the Draft SEIR does not adequately address the zoning of the project site and requested that the City further explore the ability to use zoning to enforce uses of the project site.

LETTER 22: VERBAL COMMENTS: DRAFT SUBSEQUENT EIR PUBLIC MEETING (SEPTEMBER 11, 2024)

Response to Comment 22-1

The currently proposed project invokes the "Builder's Remedy," which is based on a provision of California's Housing Accountability Act that prevents jurisdictions without a substantially compliant housing element from denying an eligible housing project on the basis that the project does not comply with the jurisdiction's general plan or zoning ordinance. With respect to the proposed project, the City and project applicant entered into a settlement agreement that provides, among other things, that the City will process the project application as a Builder's Remedy project and without requiring the applicant to submit for legislative entitlements, including a General Plan Amendment and Rezone. Therefore, for purposes of the Draft SEIR, the Palomino Place Project does not require a General Plan Amendment or Rezone. As voter approval of projects under Measure D is triggered by a General Plan Amendment, the proposed project would also not require a public vote in order to be developed.

Response to Comment 22-2

Please see Response to Comment 9-21.

Response to Comment 22-3

The unit totals for each project alternative are provided in the description of each alternative in the Alternatives Analysis chapter of the Draft SEIR. The evaluation of the project alternatives starts on page 6-14 of the Draft SEIR. Please see the discussions and analyses contained therein.

The Increased Density Alternative is evaluated in the Alternatives Analysis chapter of the Draft SEIR, starting on page 6-16.

Response to Comment 22-4

The CEQA Guidelines do not require a project to implement mitigation for potential impacts that are determined to be less than significant. As discussed under Impact 4.2-7, which starts on page 4.2-61 of the Draft SEIR, the currently proposed project would not generate operational GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with the City's CAAP or County's 2020 GHG Emissions Inventory. Thus, mitigation to address project-generated GHG emissions, including through the use of a microgrid, was not required by the Draft SEIR, as the currently proposed project was found to result in GHG emissions below the applicable thresholds.

Response to Comment 22-5

As discussed on page 6-13 of the Draft SEIR, reasonable alternatives to the currently proposed project must be capable of avoiding or substantially lessening a new significant impact or substantial increase in severity of a significant impact, as identified by the Draft SEIR. Accordingly, the Alternatives Analysis chapter focuses on the environmental resource areas and specific impacts identified for the currently proposed project as requiring new or modified mitigation to reduce significant impacts to a less-than-significant level or identified as remaining significant and unavoidable. As detailed on page 6-4 of the Draft SEIR, the currently proposed project was found not to result in a new significant impact or substantially more severe significant impact related to energy use beyond what was identified in the 2009 EIR. Thus, the Alternatives Analysis did not

consider renewable energy use as part of the analysis of the Increased Density Alternative or any of the other project alternatives.

Response to Comment 22-6

The comment asks what impact approving the high-density alternative would have on the project applicant's vested rights under Builder's Remedy. This comment relates to the specific mechanics of the Housing Accountability Act and Permitting Streamlining Act and does not pertain to the Draft SEIR or the proposed project's environmental effects. The comment is noted for the record.

Response to Comment 22-7

The comment is noted for the record.

Response to Comment 22-8

The comment inquires about changing the General Plan designation of the project site as part of the City's planned General Plan update process. Whether to redesignate the site in the City's General Plan will be a policy decision for City Council to make at a later date. The comment is noted for the record.

Response to Comment 22-9

Please see the Master Response.

Response to Comment 22-10

Electric vehicle (EV) charging spaces were not included as part of Mitigation Measure 4.6-4, because the proposed project already includes EV charging spaces. As discussed on page 3-11 of the Draft SEIR, the proposed project would include the following EV charging features:

- Cottages: Lot A would include at least one Level 2 EV charging station[13] and Lot B would include at least two Level 2 EV charging stations. Both lots would include preinstalled infrastructure to easily allow for expansion of charging stations to all of the cottage parking stalls.
- Single-Family Residences: All units would support Level 2 EV charging.
- Multi-Family Residential Apartments: The apartments would include two Level 1 EV charging stations, one Level 2 EV charging station, an ability to serve or extend Level 2 charging to nine additional parking spaces, and room in the panel and capacity to serve seven Level 1 EV chargers and two Level 2 EV chargers.
- USA Pentathlon Training Facility and Pool Complex: The USA Pentathlon Training Facility and pool complex would include a minimum of two EV charging stalls.

Response to Comment 22-11

As detailed in Table 4.6-5 on page 4.6-34 of the Draft SEIR, the USA Pentathlon Training Facility, pool complex, and obstacle course are projected to reduce total VMT within the project region by 1,089 VMT. Such would occur as training for pentathlon events (fencing, laser pistol shooting, swimming, running, and obstacle course) currently requires participants to travel to two to three separate locations within the City. The proposed USA Pentathlon Training Facility would serve to

[13] According to the U.S. Department of Transportation, Level 1 EV equipment provides charging through a common residential 120-volt AC outlet and can require 40 to 50 hours to charge a battery EV to 80 percent from empty and five to six hours to charge a plug-in hybrid EV. Level 2 EV equipment offers higher-rate AC charging through 240-volt (in residential applications) electrical service. Level 2 chargers can charge a battery EV from empty to 80 percent in four to 10 hours and plug-in hybrid EV in one to two hours.

aggregate the training equipment and facilities in a single location, reducing the need for participants to travel to multiple locations to train for all of the pentathlon events.

Response to Comment 22-12

The maintenance responsibilities of the Homeowners Association (HOA) have not yet been finalized; however, the delineation of the HOA's responsibilities is not necessary for the Draft SEIR's purposes of identifying the applicable federal, State, and local policies and regulations and, where necessary, mitigation measures, that would be pertinent for the purposes of addressing the currently proposed project's potential impacts on the physical environment, which is the focus of CEQA. Additionally, it should be noted that the Wildhorse Agricultural Buffer is an existing site and not part of the project site.

The finalization of the HOA's responsibilities will be completed as part of the City's planning process, separate from the project's CEQA environmental review. The comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 22-13

As detailed in Mitigation Measure 4.9-8 on page 4.5-33 of the Draft SEIR, the currently proposed project would be required to pay in-lieu fees for the required park acreage.

Response to Comment 22-14

The comment inquires as to whether agricultural uses would be permitted on the project site in the future given that the site will remain agricultural for purposes of the General Plan and zoning regulations. As described in the Draft SEIR, the City will impose conditions of approval to specify the allowed uses for the project site and clarify that the City's residential standards shall apply to the site. These conditions of approval will be recorded on title and will be enforceable against all property owners on the site. The proposed project also includes an HOA, and Covenants, Conditions, and Restrictions (CC&Rs) will provide additional limitations on property uses on the project site.

Response to Comment 22-15

The comment asks whether the project can still be challenged under CEQA given that it is a Builder's Remedy project. The comment is a legal question and not relevant to the Draft SEIR or CEQA analysis of the project, but it is noted that the Housing Accountability Act requires that a Builder's Remedy project be fully analyzed under CEQA.

Response to Comment 22-16

Please see the Master Response.

Response to Comment 22-17

The SACOG SACSIM19 model does not make any assumptions regarding the number of drivers per household. As discussed on page 21 of the TIS (see Appendix H of the Draft SEIR), the SACOG SACSIM19 model produces 2016 VMT estimates and 2040 VMT forecasts based on the 2020 SACOG Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The SACSIM19 model is an activity/tour-based model that simulates individuals' daily travel, accounting for land use, transportation, and demographic factors that influence travel behavior. SACOG recently updated SACSIM as part of its 2020 MTP/SCS. As part of this update, SACOG conducted a validation and calibration of the SACSIM 2016 base year travel model that included using household travel surveys, transit boarding data, on-board transit surveys, traffic count data,

and VMT estimates from annual Highway Performance Monitoring Systems data to verify the SACSIM19 model reasonably replicated observed travel behavior.

Response to Comment 22-18
Please see the Master Response.

Response to Comment 22-19
Please see Response to Comment 15-2.

Response to Comment 22-20
Please see Response to Comment 15-8.

Response to Comment 22-21
The currently proposed project is subject to approval by the Davis Planning Commission. Should the Planning Commission vote to recommend that the project applicant, instead, pursue the Increased Density Alternative (the Environmentally Superior Alternative identified by the Draft SEIR on page 6-31), the project applicant could elect to do so. In such a case, City staff would determine whether additional environmental analysis is required to ensure that the potential environmental impacts and mitigation measures are fully evaluated. Nonetheless, the project applicant has the right to proceed with their initially proposed project pursuant to state law and the settlement agreement between the City and project applicant.

Response to Comment 22-22
Figure 6-1 of the Draft SEIR on page 6-18 depicts the Increased Density Alternative site plan. As detailed in the description of the Increased Density Alternative on page 6-17 of the Draft SEIR, aside from the increase in density and the inclusion of a Multi-Modal Transit Center in the southwestern corner of the project site, all other site improvements that would be included as part of the proposed project would still be developed under the alternative. Given that the description of storm drainage service for the proposed project on page 3-13 of the Draft SEIR provides that the stormwater basin would serve to temporarily detain and treat stormwater flows, such actions would similarly apply to the stormwater basin under the Increased Density Alternative. Additionally, the requested revision would not affect the analyses and conclusions related to the Increased Density Alternative.

Response to Comment 22-23
Please see Response to Comment 15-12.

Response to Comment 22-24
The comment does not address the adequacy of the Draft SEIR. The comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 22-25
The Multi-Modal Transit Center (MMTC) in the southwestern corner of the Increased Density Alternative, along East Covell Boulevard (see Figure 6-1), is not factored in the VMT evaluation for the Increased Density Alternative. In part, this is due to the conceptual nature of the MMTC and the uncertainty regarding whether the transit service provider would be agreeable to serving it. The City cannot compel another agency (e.g., Unitrans) to provide service to the project site.

Therefore, the VMT evaluation for this alternative conservatively did not account for increased transit service at the MMTC.

Response to Comment 22-26

Please see the discussions under the Access, Circulation, and Parking heading in the Project Description chapter of the Draft SEIR, which starts on page 3-11.

Response to Comment 22-27

The comment does not address the adequacy of the Draft SEIR. The comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 22-28

The finalization of the Affordable Housing Plan will be completed as part of the City's planning process, separate from the project's CEQA environmental review. The project applicant will be subject to the applicable provisions of the City's Affordable Housing Ordinance (Davis Municipal Code Article 18.05). The comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 22-29

The MMTC was not included as part of the currently proposed project, as the location (the southwestern corner of the project site) is proposed for development of new cottages. Similarly, the No Pentathlon Facility Alternative includes development of cottages in the southwestern portion of the project site. The Reduced Density Alternative would include open space in the southwestern corner of the site.

Response to Comment 22-30

Please see the Master Response.

Response to Comment 22-31

Please see the Master Response.

Response to Comment 22-32

In accordance with CEQA Guidelines Section 15105(a), which provides that when a Draft EIR is submitted to the State Clearinghouse for review by State agencies that the public review period must not be less than 45 days, the public review period for the Draft SEIR occurred for 45 days from August 8, 2024 to September 23, 2024. Thus, the public review period for the Draft SEIR met the requirements of CEQA.

Response to Comment 22-33

The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Response to Comment 22-34

As discussed on page 3-15 of the Draft SEIR, the currently proposed project was submitted under a provision of State law commonly referred to as the Builder's Remedy, which provides that the City cannot deny the project on the basis of inconsistency with the City's General Plan or Zoning Code for eligible housing projects. While conditions of approval would impose development standards on the project and site improvements are required to comply with City standards, the

residential portions of the project and related improvements are not subject to Site Plan and Architectural Review as a Builder's Remedy project, given that the City's Site Plan and Architectural Review process serves to require new development projects to demonstrate compliance with applicable standards established by the City's Zoning Ordinance.

Response to Comment 22-35

The four-way stop recommendation is not related to CEQA but was identified in the LTA prepared by Fehr & Peers to address an LOS conflict.

Response to Comment 22-36

Vehicle queuing along the proposed Palomino Way is a non-CEQA issue related to LOS. Please see Response to Comment 7-1.

Response to Comment 22-37

CEQA does not require analysis of parking capacity as part of preparation of an EIR. While the environmental checklist found in CEQA Guidelines Appendix G previously required an assessment of a project's parking capacity, the 2010 CEQA Guidelines were updated to not include such provisions, as the environmental review process is intended to provide an impartial evaluation of the environmental impacts of a project. As such, in most cases, CEQA does not currently require consideration of parking adequacy, unless a project's parking would result in substantial secondary effects on the physical environment.

Response to Comment 22-38

The comment is noted for the record and will be forwarded to the decision-makers for their consideration.

Response to Comment 22-39

The comment does not address the adequacy of the Draft SEIR. Please see the Master Response.

Response to Comment 22-40

The comment does not address the adequacy of the Draft SEIR and has been noted for the record.

Response to Comment 22-41

Please see the Master Response and Response to Comment 17-1.

Response to Comment 22-42

Please see Response to Comment 12-2.

Response to Comment 22-43

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Please see Response to Comment 12-4.

Response to Comment 22-44

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. Please refer to responses to Letter 12.

Response to Comment 22-45

The comment does not address the adequacy of the Draft SEIR and has been noted for the record. The comment will be forwarded to the decision-makers for their consideration.

Response to Comment 22-46

Please see the Master Response.

Response to Comment 22-47

The comment is speculative and CEQA does not require analysis of speculation (see CEQA Guidelines Section 15384).

Response to Comment 22-48

Please see Response to Comment 22-34.

Response to Comment 23-49

Please see Response to Comment 22-34.

3. Revisions to the Draft SEIR Text

3. REVISIONS TO THE DRAFT SEIR TEXT

3.1 INTRODUCTION

The Revisions to the Draft SEIR Text chapter provides all corrections, additions, and revisions made to the Draft SEIR. The changes represent minor clarifications and amplifications of the analysis contained in the Draft SEIR and do not constitute significant new information that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft SEIR. Please refer to the discussion of this topic provided in Section 1.5 of Chapter 1, Introduction and List of Commenters, of this Final SEIR.

3.2 DESCRIPTION OF CHANGES

New text is double underlined and deleted text is ~~struck through~~. Text changes are presented in the page order in which they appear in the Draft SEIR.

2 Executive Summary

Table 2-1 in Chapter 2, Executive Summary, of the Draft SEIR is hereby revised to reflect the revisions made to mitigation measures in Chapter 4.5, Public Services and Utilities, Chapter 4.6, Transportation, and Chapter 4.7, Other Effects, of the Draft SEIR, as presented below. Rather than include the entirety of Table 2-1 with revisions shown where appropriate, only the impact for which mitigation has been revised is presented in this chapter. The revisions to Table 2-1 are presented at the end of this chapter.

4.2 Air Quality, Greenhouse Gas Emissions, and Energy

Table 4.2-10 of the Draft SEIR is hereby revised, as follows:

Table 4.2-10
Maximum Unmitigated Operational Emissions

	ROG (tons/yr)	NO_X (tons/yr)	PM_{10} (lbs/day)
Baseline Conditions Scenario	2.53 ~~2.98~~	1.58 ~~2.06~~	13.1 ~~17.7~~
Proposed Project Scenario	2.64 ~~1.12~~	1.42 ~~2.23~~	11.3
Net Change	*+0.11 ~~-1.86~~*	*-0.16 ~~+0.17~~*	*-1.8 ~~-6.4~~*
YSAQMD Threshold of Significance	**10.00**	**10.00**	**80.00**
Exceeds Threshold?	**NO**	**NO**	**NO**

Source: CalEEMod, October ~~March~~ 2024 (see Appendix C).

Page 4.2-46 of the Draft SEIR is hereby revised, as follows:

> As demonstrated in Table 4.2-10, the Proposed Project Scenario would result in a net increase in operational emissions of ROG ~~NO_X~~ and a net decrease in operational emissions of NO_X ~~ROG~~ and PM_{10}, as compared to the Baseline Conditions Scenario. Operational emissions of ROG, NO_X, and PM_{10} associated with the Proposed Project Scenario would be below the applicable YSAQMD thresholds of significance.

Page 4.2-48 of the Draft SEIR is hereby revised, as follows:

> The PCAPCD has a numerical screening level for localized CO impacts. According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day. According to the modeling performed for the proposed project, the Proposed Project Scenario would result in maximum unmitigated operational mobile source CO emissions of 57.5 ~~89.4~~ lbs/day, which is a reduction of 8.5 ~~11.6~~ lbs/day as compared to the 66.0 ~~101~~ lbs/day of operational mobile source CO emissions that would be generated by the Approved Conditions Scenario (see Appendix C). Consequently, CO emissions related to mobile sources associated with operation of the proposed project would be below the 550 lbs/day screening threshold used by PCAPCD, and, according to the PCAPCD's screening methodology for localized CO emissions, the proposed project would not be expected to generate localized CO emissions that would contribute to an exceedance of AAQS or expose sensitive receptors to substantial concentrations of localized CO.

Pages 4.2-56 and 4.2-57 of the Draft SEIR are hereby revised, as follows:

> The average fuel economy for the U.S. passenger vehicle fleet was 24.8 miles per gallon (mpg) in 2022, the most recent year such data is available.[1] In addition, petroleum refineries in the U.S. typically produce approximately 20 gallons of gasoline from one 42-gallon barrel of crude oil. Using an average of 24.8 mpg and an annual VMT of approximately 5,679,857,[2] the project would result in the consumption of approximately 11,487 barrels of crude oil a year, which is a reduction of 1,826 ~~10,660~~ barrels as compared to the 13,313 ~~22,147~~[3] barrels of crude oil a year that would be consumed under buildout of the Wildhorse Ranch Project. California is estimated to consume approximately 605 million barrels of petroleum per year.[4] Based on the annual consumption within the State, vehicle trips generated by the proposed project would result in a 0.002 percent increase in the State's current consumption of gasoline, a decrease as compared to the 0.004 percent increase that would be associated with the Wildhorse Ranch Project.

Table 4.2-11 of the Draft SEIR is hereby revised, as follows:

Table 4.2-11
Maximum Unmitigated Construction GHG Emissions

	GHG Emissions ($MTCO_2e$/yr)
Baseline Conditions Scenario	527 ~~232~~
Proposed Project Scenario	785
Net Change	*+258 ~~+553~~*
Threshold of Significance	**1,100**
Exceeds Threshold?	**NO**
Source: CalEEMod, March 2024 (see Appendix C).	

[1] U.S. Energy Information Administration. *Total Energy, Table 1.8 Motor Vehicle Mileage, Fuel Consumption, and Fuel Economy*. Available at: https://www.eia.gov/totalenergy/data/browser/?tbl=T01.08#/?f=A&start=200001. Accessed March 2024.

[2] The annual VMT estimate presented herein is based on the Transportation Impact Study prepared for the proposed project by Fehr & Peers.

[3] Estimated using the annual VMT estimate for the Wildhorse Ranch Project of 6,602,949 ~~10,985,150~~, as provided by Fehr & Peers.

[4] U.S. Energy Information Administration. *California: State Profile and Energy Estimates*. Available at: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA. Accessed March 2024.

Table 4.2-12 of the Draft SEIR is hereby revised, as follows:

Table 4.2-12
Maximum Unmitigated Operational GHG Emissions

Emission Source	GHG Emissions ($MTCO_2e$/yr)		
	Baseline Conditions Scenario	Proposed Project Scenario	Net Change
Mobile	2,479 ~~3,362~~	2,110 ~~2,081~~	*-369 ~~-1,281~~*
Area	2.37	2.38	*+0.01*
Energy	298	265	*-33*
Water	13.1	12.7	*-0.4*
Waste	42.4	68.8	*+26.4*
Refrigerants	0.31	0.33	*+0.02*
Total Annual GHG Emissions	**2,836 ~~3,718~~**	**2,459 ~~2,430~~**	***-377 ~~-1,288~~***

Source: CalEEMod, October ~~March~~ 2024 (see Appendix C).

The foregoing revisions are for clarification purposes only, and do not affect the conclusions of the Draft SEIR.

4.5 Public Services and Utilities

Impact 4.5-1 and Mitigation Measure 4.9-4 from the 2009 EIR, on pages 4.5-26 and -27 of the Draft EIR, is hereby revised as follows:

> Since certification of the 2009 EIR, the City has adopted a public safety development impact fee that collects monies from new development projects to help fund needed fire protection facilities and services. The proposed project would be required to pay this fee, though it would not ensure construction of a fourth fire station, as it is dependent upon other planned development~~Notwithstanding, because a fourth fire station is not included in the City's current Capital Improvement Program (CIP), payment of the City's public safety development impact fee would not collect the project's fair share toward construction of a fourth fire station. As a result, in addition to the citywide public safety development impact fee, the proposed project would also be required to implement Mitigation Measure 4.9-4 of the 2009 EIR, which will specifically ensure that the project pays a fair share toward a fourth fire station~~.
>
> Based on the above, the currently proposed project would not result in a new significant impact or substantially more severe significant impact related to new or expanded fire protection facilities, the construction of which could cause significant environmental impacts, beyond what was previously identified in the 2009 EIR.
>
> Applicable Mitigation Measure(s) from the 2009 EIR
> ~~The following mitigation measure would be applicable to the proposed project. While implementation of Mitigation Measure 4.9-4 would require the applicant to provide a fair share payment toward construction of a fourth fire station, the mitigation measure would not result in the actual construction of a fourth fire station, as that is dependent on additional factors, such as collection of the balance of needed funds and voter approval of other pending projects along East Covell Boulevard. Thus, even with payment of the City's public safety development impact fee, alone, similar to the 2009 EIR, the impact would remain *significant and unavoidable*~~.

~~*4.9-4 Prior to the issuance of building permits, the applicant shall contribute funds to the Davis Fire Department for the provision of facilities needed to provide adequate fire protection service to the proposed project. These facilities may include but are not necessarily limited to a fourth City fire station and a ladder truck. The amount of funding shall be determined by the Community Development Director and the Davis Fire Chief.*~~ *None applicable.*

Modified Mitigation Measure(s)

~~*None required.*~~The following mitigation measure from the 2009 EIR, as revised, would be applicable to the proposed project. While implementation of Mitigation Measure 4.9-4 would require the applicant to provide a fair share toward fire protection services, the mitigation measure would not result in the actual construction of a fourth fire station, as that is dependent on additional factors, such as collection of the balance of needed funds and voter approval of other pending projects along East Covell Boulevard. Thus, even with payment of the City's public safety development impact fee, alone, similar to the 2009 EIR, the impact would remain *significant and unavoidable*.

4.9-4 Prior to the issuance of each building permit~~s~~, the applicant shall ~~contribute funds to the Davis Fire Department~~ pay the applicable public safety impact fee for the provision of facilities needed to provide adequate fire protection service to the proposed project. These facilities may include but are not necessarily limited to a fourth City fire station and a ladder truck. ~~The amount of funding shall be determined by the Community Development Director and the Davis Fire Chief.~~

New Mitigation Measure(s)

None required.

The above revisions are for clarifications purposes and the Draft SEIR analysis remains adequate.

4.6 Transportation

Table 4.6-4 on page 4.6-33 of the Draft SEIR is hereby revised, as follows:

Table 4.6-4
Project Residential Component Weekday Residential VMT per Capita

Scenario	Residential VMT per Capita[1]	Significance Threshold (15 percent Below Existing Average)	Project Residential Component Compared to Baseline Average	Project-Generated Residential VMT per Capita Reduction Required to Meet Significance Threshold
Project Residential Component	33.0	--	--	--
Baseline City of Davis Average	30.1	25.6[2]	+9.7%[4]	-22.5%[6]

Baseline SACOG Region Average	21.7	18.4[3]	+52.6%[5]	-44.3%[7]

[1] Estimated using the SACOG SACSIM19 travel demand model.
[2] Represents the VMT significance threshold for the City of Davis, which is 85% of the baseline City of Davis residential VMT per capita average. Calculated as follows: 30.1 residential VMT per capita x 0.85 = 25.6 residential VMT per capita.
[3] Represents the VMT significance threshold for the SACOG Region, which is 85% of the baseline SACOG Region residential VMT per capita average. Calculated as follows: 21.7 residential VMT per capita x 0.85 = 18.4 residential VMT per capita.
[4] Represents the percentage difference between the project-generated residential VMT per capita and the baseline City of Davis residential VMT per capita average. Calculated as follows: 33.0 residential VMT per capita ÷ 30.1 residential VMT per capita – 1 = 9.7%.
[5] Represents the percentage difference between the project-generated residential VMT per capita and the baseline SACOG Region residential VMT per capita average. Calculated as follows: 33.0 residential VMT per capita ÷ 21.7 residential VMT per capita – 1 = 52.6%.
[6] Represents the project-generated residential VMT per capita reduction necessary to fall below the City of Davis significance threshold. Calculated as follows: (33.0 residential VMT per capita – 25.6 residential VMT per capita) ÷ 33.0 residential VMT per capita = -22.5%.
[7] Represents the project-generated residential VMT per capita reduction necessary to fall below the SACOG Region significance threshold. Calculated as follows: (33.0 residential VMT per capita – 18.4 residential VMT per capita) ÷ 33.0 residential VMT per capita = -44.3%.

Source: Fehr & Peers, 2024.

Mitigation Measure SEIR 4.6-2(b) on pages 4.6-30 and -31 is hereby revised, as follows:

SEIR 4.6-2(b) *Prior to ~~occupancy of the~~ issuance of building permit for the 75th market-rate residential unit~~s~~ at the project site, the commencement of operations at the aquatic complex, or the commencement of operations at the USA Pentathlon Training Facility (whichever occurs first), the project applicant shall install a traffic signal at the East Covell Boulevard/Monarch Lane intersection. The purpose of the traffic signal is to provide temporal separation between bicyclists, pedestrians, and conflicting vehicular movements (e.g., through the provision of pedestrian crossing phases). As part of this mitigation measure, the applicant shall also construct an eastbound left-turn pocket with a queue storage length of 105 feet and install designated bicycle and pedestrian facilities and crossings.*

The specific intersection geometrics, lane configurations, bicycle and pedestrian accommodations, and signal phasing are subject to review and approval by the City of Davis City Engineer.

Note that this intersection would meet the four-hour vehicular volume signal warrant (CA MUTCD Warrant 2) and the peak hour signal warrant (CA MUTCD Warrant 3B) under Existing Plus Project conditions.

Implementation of these improvements, or a set of improvements of equal effectiveness as determined by the City of Davis City Engineer, would reduce the potential for conflicts involving bicyclists or pedestrians that could otherwise be caused by the project and promote bicycle and pedestrian travel to and from the project site.

The above changes to the timing of the mitigation measure have been determined acceptable by the City of Davis and the potential impact would still be fully mitigated.

Mitigation Measure SEIR 4.6-4 on pages 4.6-34 to 4.6-37 is hereby revised, as follows:

SEIR 4.6-4 *The project applicant shall implement the following TDM strategies to reduce the number of vehicle trips that would be generated by the project residential component, subject to review and approval by the City Engineer. The timing for each strategy is set forth below:*

1) ***Implement subsidized or discounted transit program (CAPCOA Handbook Strategy T-9)*** *– This measure would provide subsidized or discounted, or free transit passes for residents of the project's 45 affordable housing dwelling units. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT.*

   ~~Prior to occupancy of the~~ Concurrent with the occupancy of each multi-family residential unit~~s~~, the project applicant shall provide free transit passes to residents of the project's 45 affordable housing dwelling units. According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.16 percent.

2) ***Implement carshare program (CAPCOA Handbook Strategy T-21-A)*** *– This measure would increase carshare access in the project site by deploying conventional carshare vehicles. Examples include programs like Zipcar and GIG Car Share. Carsharing offers people convenient access to a vehicle for personal or commuting purposes, which helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT.*

   Prior to occupancy of the first phase of the project residential component, the project applicant shall partner with a carshare service provider and ensure that carshare vehicles are available to project residents. Proof of completion of this measure shall be provided to the City of Davis.

   According to CAPCOA, this strategy would have a maximum reduction potential of 0.15 percent of project VMT.

3) ***Implement electric bikeshare program (CAPCOA Handbook Strategy T-22-B)*** *– This measure would establish an electric bikeshare program. Electric bikeshare programs provide users with on-demand access to electric-pedal-assist bikes for short-term rentals. This encourages mode shift from vehicles to electric bicycles, displacing VMT and reducing GHG emissions.*

   Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the project applicant shall provide the City of Davis with evidence of an agreement for a hub with a bikeshare and scootershare system operator for the project. Currently, Spin provides bikeshare and scootershare service to the entirety of the City of Davis and the UC Davis campus. Accordingly, the project site is presumed to be incorporated into the Spin service area.

Prior to issuance of an occupancy permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the applicant shall construct a hub for use by the bikeshare and scootershare system operator within the multi-family housing or USA Pentathlon Training Facility.

According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.05 percent.

4) ***Implement scootershare program (CAPCOA Handbook Strategy T-22-C)*** *– This measure would establish a scootershare program. Scootershare programs provide users with on-demand access to electric scooters for short-term rentals. This encourages a mode shift from vehicles to scooters, displacing VMT and thus reducing GHG emissions.*

   Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the project applicant shall provide the City of Davis with evidence of an agreement for a hub with a bikeshare and scootershare system operator for the project. Currently, Spin provides bikeshare and scootershare service to the entirety of the City of Davis and the UC Davis campus. Accordingly, the project site is presumed to be incorporated into the Spin service area.

   Prior to issuance of an occupancy permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the applicant shall construct a hub for use by the bikeshare and scootershare system operator within the multi-family housing or USA Pentathlon Training Facility.

   According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.06 percent.

5) ***Community-based travel planning (CAPCOA Handbook Strategy T-23)*** *– This measure would target residences in the project area with community-based travel planning (CBTP). CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT.*

   Prior to occupancy of the first phase of the project residential component, the project applicant shall partner with a CBTP service provider such as Yolo Commute and ensure that CBTP services are available to project residents, and renewed on an annual basis. As of early 2024, Yolo Commute annual membership dues for a housing development of 175 units are $2,250 per year.

   According to CAPCOA, this strategy would have a maximum reduction potential of 2.3 percent of project VMT.

Table 4.6-6 on page 4.6-39 of the Draft SEIR is hereby revised, as follows:

Table 4.6-6
Freeway Off-Ramp Queuing – Existing Plus Project Conditions

Off-Ramp	Off-Ramp Distance[1]	Maximum Queue Length[2]			
		Existing Conditions		Existing Plus Project Conditions	
		AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
Mace Boulevard/I-80 WB Off-Ramp	1,200 feet	200 feet	~~200 feet~~ 175 feet	200 feet	~~250 feet~~ 200 feet
Chiles Road/I-80 EB Off-Ramp	1,100 feet	125 feet	175 feet	125 feet	~~175 feet~~ 200 feet

Notes:
1. Measured from the intersection stop bar to the gore point of the freeway off-ramp. Does not include auxiliary lane on freeway mainline.
2. Maximum queue estimates are based on results from SimTraffic micro-simulation model. Queues are maximum per lane, rounded up to the nearest 25 feet.

Source: Fehr & Peers, 2024.

The above revisions are for clarification purposes to ensure consistency between the Transportation Impact Study (TIS) prepared for the currently proposed project by Fehr & Peers (see Appendix H of the Draft SEIR) and Fehr & Peers' Local Transportation Analysis (LTA) prepared for the purposes of allowing the City to review the project's consistency with General Plan Level of Service goals and policies. The foregoing revisions do not change the conclusions of the Draft SEIR.

4.7 Other Effects

Section 4.7.3, Cultural Resources, pages 4.7-6 and -7 are hereby revised, as follows, based on consultation with Yoche Dehe Wintun Nation that occurred subsequent to the release of the Draft SEIR:

Applicable Mitigation Measure(s) from the 2009 EIR
Implementation of the following mitigation measures from the 2009 EIR would reduce the above potential impact to a *less-than-significant* level.

~~*V-1 Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, an archaeological monitor shall be retained by the applicant and approved by the City to train the construction grading crew prior to commencement of earth-grading activity in regard to the types of artifacts, rock, bone, or shell that they are likely to find, and when work shall be stopped for further evaluation. One trained crew member shall be on-site during all earth moving activities, with the assigned responsibility of "monitor." If any earth-moving activities uncover artifacts, exotic rock, or unusual amounts of bone or shell, work shall be halted in the immediate area of the find and shall not be resumed until after the archaeologist monitor has inspected and evaluated the deposit and determined the appropriate means of curation. The appropriate mitigation measures may include as little as recording the resource with the California Archaeological Inventory database or as much as excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance.*~~

V-2 *Prior to the approval of tentative map(s), the tentative map(s) shall state that during construction, if bone is uncovered that may be human; the Native American Heritage Commission in Sacramento and the Yolo County Coroner shall be notified. Should human remains be found, the Coroner's office shall be immediately contacted and all work halted until final disposition by the Coroner. Should the remains be determined to be of Native American descent, the Native American Heritage Commission shall be consulted to determine the appropriate disposition of such remains.*

Modified Mitigation Measure(s)

~~*None required.*~~

V-1 *Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, an archaeological monitor shall be retained by the applicant and approved by the City to train the construction grading crew prior to commencement of earth-grading activity in regard to the types of artifacts, rock, bone, or shell that they are likely to find, and when work shall be stopped for further evaluation. One trained crew member shall be on-site during all earth moving activities, with the assigned responsibility of "monitor." If any earth-moving activities uncover artifacts, exotic rock, or unusual amounts of bone or shell, work shall be halted in the immediate area of the find and shall not be resumed until after the archaeologist monitor has inspected and evaluated the deposit and determined the appropriate means of curation. The appropriate mitigation measures may include as little as recording the resource with the California Archaeological Inventory database or as much as excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance. The Yocha Dehe Wintun Nation ("Tribe") traditionally occupied lands in Yolo County and will be presumed to be the Most Likely Descendants (MLD) of any tribal cultural resource or remains discovered on-site unless otherwise determined by an archeologist or the County coroner. Prior to commencement of construction-related activities, the applicant shall enter into a training and monitoring agreement with the Tribe, which may also serve to fulfill the requirement for an archeological monitor subject to City approval. In the event that any Native American human remains, grave goods, ceremonial terms, or items of cultural patrimony, are found in conjunction with development, the applicant shall contact Tribal representatives and use the Tribe's Protocol for the treatment of such resources.*

New Mitigation Measure(s)

None required.

Section 4.7.6, Hydrology and Water Quality, pages 4.7-15 and -16 are hereby revised as follows to correct the responsible party:

Applicable Mitigation Measure(s) from the 2009 EIR

~~Implementation of the following mitigation measure from the 2009 EIR would reduce the above potential impact to a *less-than-significant level*.~~

~~*4.8-3* *Prior to commencement of construction, the applicant shall obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), which pertains to*~~

~~*pollution from grading and project construction. Compliance with the Permit requires the project applicant to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to ground disturbance. The SWPPP would incorporate Best Management Practices (BMPs) in order to prevent, or reduce to the greatest extent feasible, adverse impacts to water quality from erosion and sedimentation. A copy of the SWPP including BMP implementation provisions shall be submitted to the Chief Building Official.*~~

None applicable.

Modified Mitigation Measure(s)

The following mitigation measures from the 2009 EIR has~~ve~~ been modified to refine the timing trigger and to correct the responsible party for th~~is~~e previously adopted measures. Modifications are shown in ~~strikethrough~~ and double-underline below. Implementation of the following modified mitigation measures from the 2009 EIR would reduce the above potential impact to a less-than-significant level.

4.8-2 *In conjunction with the submittal of ~~a tentative map~~ improvement plans, the project applicant shall submit a design-level engineering report on the stormwater detention and conveyance system to the City Engineer demonstrating that the proposed project peak flows into the existing 36-inch storm drain would not exceed 6.2 cfs. The report shall also demonstrate that peak flows from the site do not coincide with peak flows within Channel "A" and demonstrate how the system would function to adequately treat stormwater runoff prior to being discharged into Channel "A." Stormwater detention and conveyance plans shall be reviewed and approved by the City Engineer.*

4.8-3 *Prior to commencement of construction, the applicant shall obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), which pertains to pollution from grading and project construction. Compliance with the Permit requires the project applicant to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to ground disturbance. The SWPPP would incorporate Best Management Practices (BMPs) in order to prevent, or reduce to the greatest extent feasible, adverse impacts to water quality from erosion and sedimentation. A copy of the SWPP including BMP implementation provisions shall be submitted to the ~~Chief Building Official~~ City Engineer.*

5 Statutorily Required Sections

Page 5-8 of the Draft SEIR is hereby revised, as follows:

Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. (Impact 4.5-1)

The 2009 EIR evaluated potential impacts associated with an increased demand for fire protection services under Impact 4.9-4. While Mitigation Measure 4.9-4 required the Wildhorse Ranch Project to contribute funding towards the provision of needed fire facilities, which could include a fourth fire station, the balance of needed funding was not guaranteed. Thus, the 2009 EIR identified a significant and unavoidable impact.

Since certification of the 2009 EIR, the City has adopted a public safety development impact fee that collects monies from new development projects to help fund needed fire protection facilities and services. The proposed project would be required to pay this fee, though it would not ensure construction of a fourth fire station, as it is dependent upon other planned development. The currently proposed project would not result in a new significant impact or substantially more severe significant impact related to new or expanded fire protection facilities, the construction of which could cause significant environmental impacts, beyond what was previously identified in the 2009 EIR.

However, while implementation of Mitigation Measure 4.9-4 would require the applicant to provide a fair share payment toward fire protection services, the mitigation measure would not result in the actual construction of a fourth fire station, as that is dependent on additional factors, such as collection of the balance of needed funds and voter approval of other pending projects along East Covell Boulevard. Thus, even with payment of the City's public safety development impact fee, alone, similar to the 2009 EIR, the impact would remain significant and unavoidable.

The foregoing revisions are for clarification purposes only, and do not affect the conclusions of the Draft SEIR.

6 Alternatives Analysis

The conceptual site plan for the Increased Density Alternative, included as Figure 6-1 of the Draft SEIR, inadvertently included a greater amount of residential acreage than was used in the VMT calculations for the Alternative. As a result, the conceptual site plan has been revised in this Final SEIR, as shown on the following page, so that the total net acreage of the residential land uses equates to 13.0 acres, consistent with the VMT calculations. In general, this was done by increasing the amount of open space in the northern portion of the alternative layout and by more accurately incorporating the circulation infrastructure that would be needed for the site plan.

The revision is for clarification purposes only and does not affect the analyses and conclusions of the Draft SEIR.

~~Figure 6-1~~
~~Increased Density Alternative Site Plan~~

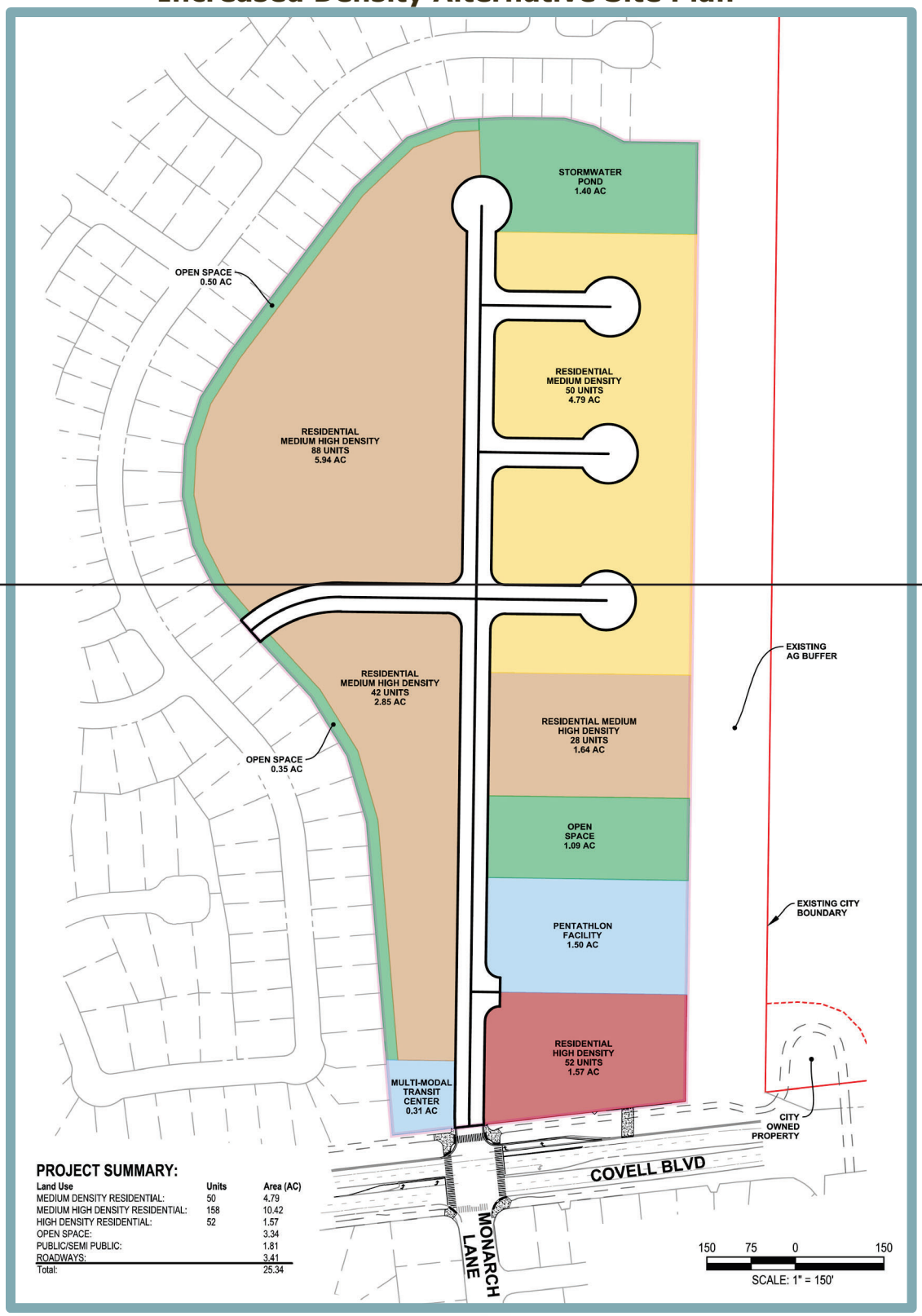

Figure 6-1
Increased Density Alternative Site Plan

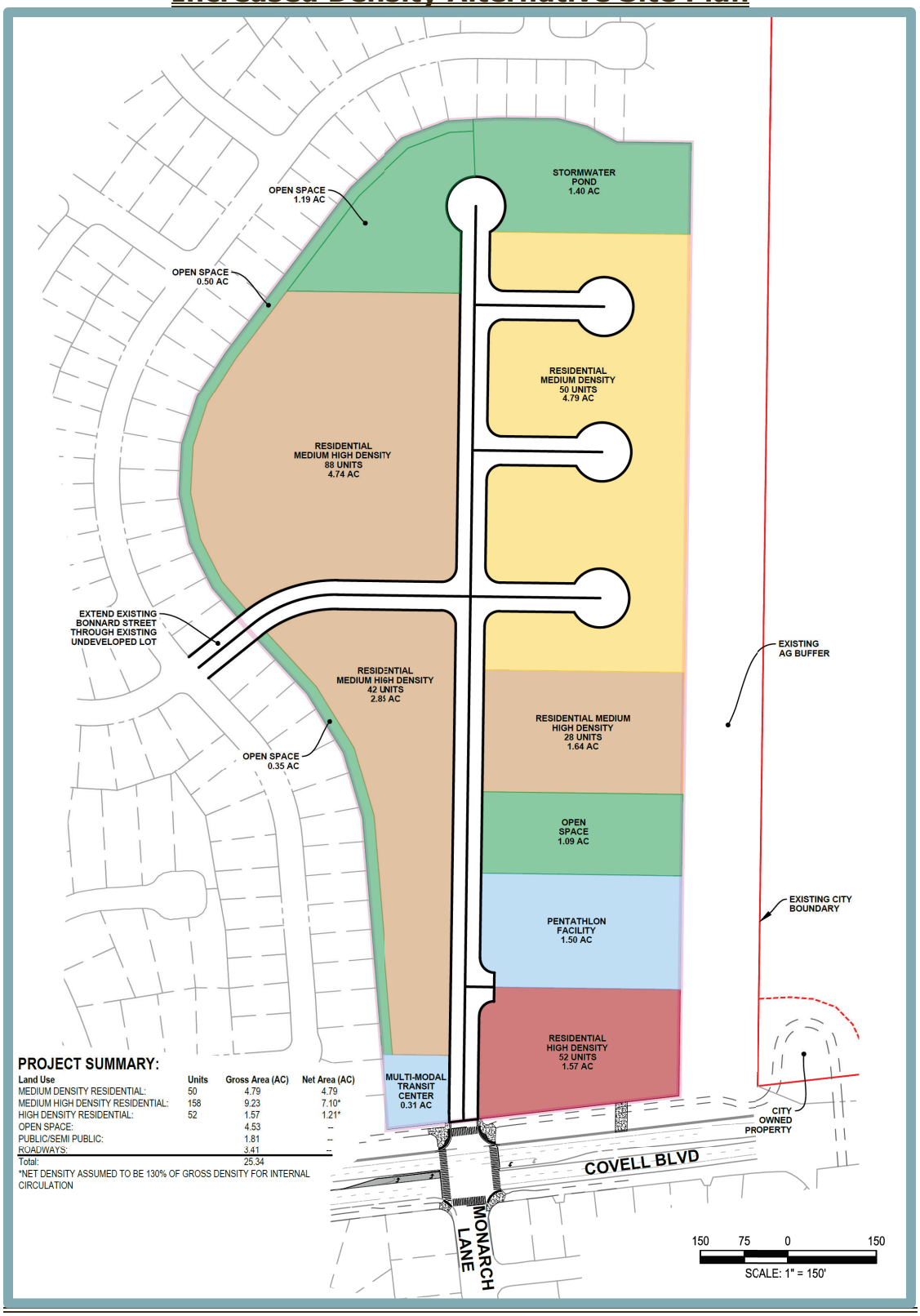

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
4.5 Public Services and Utilities				
4.5-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.	S	Applicable Mitigation Measure(s) from the 2009 EIR ~~The following mitigation measure would be applicable to the proposed project. While implementation of Mitigation Measure 4.9-4 would require the applicant to provide a fair share payment toward construction of a fourth fire station, the mitigation measure would not result in the actual construction of a fourth fire station, as that is dependent on additional factors, such as collection of the balance of needed funds and voter approval of other pending projects along East Covell Boulevard. Thus, even with payment of the City's public safety development impact fee, alone, similar to the 2009 EIR, the impact would remain *significant and unavoidable*.~~ ~~*4.9-4 Prior to the issuance of building permits, the applicant shall contribute funds to the Davis Fire Department for the provision of facilities needed to provide adequate fire protection service to the proposed project. These facilities may include but are not necessarily limited to a fourth City fire station and a ladder truck. The amount of funding shall be determined by the Community Development Director and the Davis Fire Chief.*~~ *None applicable.* Modified Mitigation Measure(s) ~~*None required.*~~The following mitigation measure from the 2009 EIR, as revised, would be applicable to the proposed project. While implementation of Mitigation Measure 4.9-4 would require the applicant to provide a fair share toward fire protection	SU	No

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		services, the mitigation measure would not result in the actual construction of a fourth fire station, as that is dependent on additional factors, such as collection of the balance of needed funds and voter approval of other pending projects along East Covell Boulevard. Thus, even with payment of the City's public safety development impact fee, alone, similar to the 2009 EIR, the impact would remain *significant and unavoidable*. *4.9-4 Prior to the issuance of each building permits, the applicant shall ~~contribute funds to the Davis Fire Department~~ pay the applicable public safety impact fee for the provision of facilities needed to provide adequate fire protection service to the proposed project. These facilities may include but are not necessarily limited to a fourth City fire station and a ladder truck. ~~The amount of funding shall be determined by the Community Development Director and the Davis Fire Chief.~~* New Mitigation Measure(s) *None required.*		
4.6 Transportation				

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
4.6-2 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway, bicycle, and pedestrian facilities.	S	New Mitigation Measure(s) *SEIR 4.6-2(b)* *Prior to ~~occupancy of the~~ issuance of building permit for the 75th market-rate residential unit~~s~~ at the project site, the commencement of operations at the aquatic complex, or the commencement of operations at the USA Pentathlon Training Facility (whichever occurs first), the project applicant shall install a traffic signal at the East Covell Boulevard/Monarch Lane intersection. The purpose of the traffic signal is to provide temporal separation between bicyclists, pedestrians, and conflicting vehicular movements (e.g., through the provision of pedestrian crossing phases). As part of this mitigation measure, the applicant shall also construct an eastbound left-turn pocket with a queue storage length of 105 feet and install designated bicycle and pedestrian facilities and crossings.* *The specific intersection geometrics, lane configurations, bicycle and pedestrian accommodations, and signal phasing are subject to review and approval by the City of Davis City Engineer.* *Note that this intersection would meet the four-hour vehicular volume signal warrant (CA MUTCD Warrant 2) and the peak hour signal warrant (CA MUTCD Warrant 3B) under Existing Plus Project conditions.*	LS	N/A

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		Implementation of these improvements, or a set of improvements of equal effectiveness as determined by the City of Davis City Engineer, would reduce the potential for conflicts involving bicyclists or pedestrians that could otherwise be caused by the project and promote bicycle and pedestrian travel to and from the project site.		
4.6-4 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	S	Applicable Mitigation Measure(s) from the 2009 EIR *None applicable.* Modified Mitigation Measure(s) *None required.* New Mitigation Measure(s) *SEIR 4.6-4* *The project applicant shall implement the following TDM strategies to reduce the number of vehicle trips that would be generated by the project residential component, subject to review and approval by the City Engineer. The timing for each strategy is set forth below:* *1)* ***Implement subsidized or discounted transit program (CAPCOA Handbook Strategy T-9)*** *– This measure would provide subsidized or discounted, or free transit passes for residents of the project's 45 affordable housing dwelling units. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit*	SU	Yes

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT. *~~Prior to occupancy of the~~ Concurrent with the occupancy of each multi-family residential unit~~s~~, the project applicant shall provide free transit passes to residents of the project's 45 affordable housing dwelling units. According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.16 percent.* 2) ***Implement carshare program (CAPCOA Handbook Strategy T-21-A)*** *– This measure would increase carshare access in the project site by deploying conventional carshare vehicles. Examples include programs like Zipcar and GIG Car Share. Carsharing offers people convenient access to a vehicle for personal or commuting purposes, which helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT.* *Prior to occupancy of the first phase of the project residential component, the project applicant shall partner with a carshare service provider and ensure that carshare vehicles are available to project residents.*		

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		Proof of completion of this measure shall be provided to the City of Davis. *According to CAPCOA, this strategy would have a maximum reduction potential of 0.15 percent of project VMT.* *3)* ***Implement electric bikeshare program (CAPCOA Handbook Strategy T-22-B)*** *– This measure would establish an electric bikeshare program. Electric bikeshare programs provide users with on-demand access to electric-pedal-assist bikes for short-term rentals. This encourages mode shift from vehicles to electric bicycles, displacing VMT and reducing GHG emissions.* *Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the project applicant shall provide the City of Davis with evidence of an agreement for a hub with a bikeshare and scootershare system operator for the project. Currently, Spin provides bikeshare and scootershare service to the entirety of the City of Davis and the UC Davis campus. Accordingly, the project site is presumed to be incorporated into the Spin service area.*		

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		Prior to issuance of an occupancy permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the applicant shall construct a hub for use by the bikeshare and scootershare system operator within the multi-family housing or USA Pentathlon Training Facility. *According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.05 percent.* *4)* ***Implement scootershare program (CAPCOA Handbook Strategy T-22-C)*** *– This measure would establish a scootershare program. Scootershare programs provide users with on-demand access to electric scooters for short-term rentals. This encourages a mode shift from vehicles to scooters, displacing VMT and thus reducing GHG emissions.* *Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the project applicant shall provide the City of Davis with evidence of an agreement for a hub with a bikeshare and scootershare system operator for the project. Currently, Spin provides bikeshare*		

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		and scootershare service to the entirety of the City of Davis and the UC Davis campus. Accordingly, the project site is presumed to be incorporated into the Spin service area. *Prior to issuance of an occupancy permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the applicant shall construct a hub for use by the bikeshare and scootershare system operator within the multi-family housing or USA Pentathlon Training Facility.* *According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.06 percent.* 5) ***Community-based travel planning (CAPCOA Handbook Strategy T-23)*** *– This measure would target residences in the project area with community-based travel planning (CBTP). CBTP is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT.*		

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		Prior to occupancy of the first phase of the project residential component, the project applicant shall partner with a CBTP service provider such as Yolo Commute and ensure that CBTP services are available to project residents, and renewed on an annual basis. As of early 2024, Yolo Commute annual membership dues for a housing development of 175 units are $2,250 per year. *According to CAPCOA, this strategy would have a maximum reduction potential of 2.3 percent of project VMT.*		
4.7 Other Effects				
4.7.3 Cultural Resources	S	Applicable Mitigation Measure(s) from the 2009 EIR Implementation of the following mitigation measures~~:~~ from the 2009 EIR would reduce the above potential impact to a *less-than-significant* level. ~~*V-1 Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, an archaeological monitor shall be retained by the applicant and approved by the City to train the construction grading crew prior to commencement of earth-grading activity in regard to the types of artifacts, rock, bone, or shell that they are likely to find, and when work shall be stopped for further evaluation. One trained crew member shall be on-site during all earth moving activities, with the assigned responsibility of*~~	LS	No

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		~~*"monitor." If any earth-moving activities uncover artifacts, exotic rock, or unusual amounts of bone or shell, work shall be halted in the immediate area of the find and shall not be resumed until after the archaeologist monitor has inspected and evaluated the deposit and determined the appropriate means of curation. The appropriate mitigation measures may include as little as recording the resource with the California Archaeological Inventory database or as much as excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance.*~~ *V-2* *Prior to the approval of tentative map(s), the tentative map(s) shall state that during construction, if bone is uncovered that may be human; the Native American Heritage Commission in Sacramento and the Yolo County Coroner shall be notified. Should human remains be found, the Coroner's office shall be immediately contacted and all work halted until final disposition by the Coroner. Should the remains be determined to be of Native American descent, the Native American Heritage Commission shall be consulted to determine the appropriate disposition of such remains.* <u>Modified Mitigation Measure(s)</u> ~~*None required.*~~		

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		V-1 Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, an archaeological monitor shall be retained by the applicant and approved by the City to train the construction grading crew prior to commencement of earth-grading activity in regard to the types of artifacts, rock, bone, or shell that they are likely to find, and when work shall be stopped for further evaluation. One trained crew member shall be on-site during all earth moving activities, with the assigned responsibility of "monitor." If any earth-moving activities uncover artifacts, exotic rock, or unusual amounts of bone or shell, work shall be halted in the immediate area of the find and shall not be resumed until after the archaeologist monitor has inspected and evaluated the deposit and determined the appropriate means of curation. The appropriate mitigation measures may include as little as recording the resource with the California Archaeological Inventory database or as much as excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance. The Yocha Dehe Wintun Nation ("Tribe") traditionally occupied lands in Yolo County and will be presumed to be the Most Likely Descendants (MLD) of any tribal cultural resource or remains discovered on-site unless otherwise determined by an archeologist or the County coroner. Prior to commencement of construction-		

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		related activities, the applicant shall enter into a training and monitoring agreement with the Tribe, which may also serve to fulfill the requirement for an archeological monitor subject to City approval. In the event that any Native American human remains, grave goods, ceremonial terms, or items of cultural patrimony, are found in conjunction with development, the applicant shall contact Tribal representatives and use the Tribe's Protocol for the treatment of such resources. New Mitigation Measure(s) *None required.*		
4.7.6 Hydrology and Water Quality	S	Applicable Mitigation Measure(s) from the 2009 EIR ~~Implementation of the following mitigation measure from the 2009 EIR would reduce the above potential impact to a *less-than-significant level.*~~ ~~*4.8-3 Prior to commencement of construction, the applicant shall obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), which pertains to pollution from grading and project construction. Compliance with the Permit requires the project applicant to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to ground disturbance. The SWPPP would incorporate Best Management Practices (BMPs) in order to prevent, or reduce to*~~	LS	No

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		~~*the greatest extent feasible, adverse impacts to water quality from erosion and sedimentation. A copy of the SWPP including BMP implementation provisions shall be submitted to the Chief Building Official.*~~ None applicable. Modified Mitigation Measure(s) The following mitigation measures from the 2009 EIR has~~s~~ve been modified to refine the timing trigger and to correct the responsible party for thi~~s~~se previously adopted measures. Modifications are shown in ~~strikethrough~~ and double-underline below. Implementation of the following modified mitigation measures from the 2009 EIR would reduce the above potential impact to a less-than-significant level. *4.8-2 In conjunction with the submittal of ~~a tentative map~~ improvement plans, the project applicant shall submit a design-level engineering report on the stormwater detention and conveyance system to the City Engineer demonstrating that the proposed project peak flows into the existing 36-inch storm drain would not exceed 6.2 cfs. The report shall also demonstrate that peak flows from the site do not coincide with peak flows within Channel "A" and demonstrate how the system would function to adequately treat stormwater runoff prior to being discharged into Channel "A." Stormwater detention and*		

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation	New Significant or Substantially More Severe Significant Impact
		conveyance plans shall be reviewed and approved by the City Engineer. *4.8-3* *Prior to commencement of construction, the applicant shall obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), which pertains to pollution from grading and project construction. Compliance with the Permit requires the project applicant to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to ground disturbance. The SWPPP would incorporate Best Management Practices (BMPs) in order to prevent, or reduce to the greatest extent feasible, adverse impacts to water quality from erosion and sedimentation. A copy of the SWPP including BMP implementation provisions shall be submitted to the ~~Chief Building Official~~ City Engineer.*		

4. Mitigation Monitoring and Reporting Program

4. MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a "mitigated negative declaration" or specified environmental findings related to an EIR.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the Palomino Place Project (proposed project). The intent of the MMRP is to ensure implementation of the mitigation measures identified within the SEIR for the proposed project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the project applicant.

4.2 COMPLIANCE CHECKLIST

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the SEIR for the proposed project prepared by the City of Davis. This MMRP is intended to be used by City staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the SEIR that was prepared for the proposed project.

The Palomino Place Project SEIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the proposed project. Mitigation is defined by CEQA Guidelines Section 15370 as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by the City of Davis. The table attached to this report identifies the mitigation measure, the monitoring action for the mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMRP. The City will be responsible for monitoring compliance.

4.3 MITIGATION MONITORING AND REPORTING PROGRAM

The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project						
Impact Number	**Impact**	**Mitigation Measure**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
4.1 Aesthetics						
4.1-2	In a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point) or, in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.	*SEIR 4.1-2*	*The project shall comply with Conditions of Approval on the Tentative Map with respect to aspects of project design, including, but not limited to, lotting layout, setbacks, height limitations, structural design, landscaping, and appearance of the project intended to create visual consistency with adjacent uses to the north, south, and west of the project site. Such conditions shall be developed by the City with the intent of imposing development standards on the project similar to what is required for the adjacent Planned Development (PD) zoning districts to ensure aesthetic compatibility with the surrounding areas and scenic quality.*	Davis Community Development and Sustainability Department	Prior to approval of improvement plans	
4.1-3	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	*4.7-2(a)*	*Prior to approval of the subdivision improvement plans, the developer shall submit a street lighting plan for review and approval by the City Engineer. The Plan shall comply with Chapter 6 of the Davis Municipal Code Article VIII: Outdoor Lighting Control, and the most recent edition of City standards and specifications.*	City Engineer	Prior to approval of the subdivision improvement plans	
		4.7-2(b)	*Prior to the issuance of building permits for the multi-family apartments and USA Pentathlon*	Chief Building Official	Prior to the issuance of building permits for the	

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			Training Facility, the developer shall submit a lighting plan for the review and approval of the Chief Building Official and the Community Development Director of the City of Davis. The lighting plan shall address-limiting light trespass and glare on the multi-family apartment site and the USA Pentathlon Training Facility through the use of shielding and directional lighting methods, which may include, but is not limited to, fixture location and height. The Plan shall comply with Chapter 6 of the Davis Municipal Code- Article VIII: Outdoor Lighting Control.	Community Development Director	multi-family apartments and USA Pentathlon Training Facility	
4.1-4	Long-term changes in visual character associated with development of the proposed project in combination with future buildout of the City of Davis and present and probable future projects.	*SEIR 4.1-4*	*Implement Mitigation Measure SEIR 4.1-2.*	See Mitigation Measure 4.1-2	See Mitigation Measure 4.1-2	
4.3 Biological Resources						
4.3-1	Have a substantial adverse effect, either directly or through habitat modifications, on special-status plant species.	*SEIR 4.3-1*	*If construction has not commenced prior to the first day of spring 2025 (March 20, 2025), a new round of special-status plant surveys shall be conducted by a qualified biologist in areas proposed for disturbance, prior to the commencement of*	Davis Community Development and Sustainability Department	Prior to the commencement of construction, if construction has not commenced prior to the first day of spring 2025	

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		construction. *The surveys shall be conducted in accordance with the U.S. Fish and Wildlife Service (USFWS) Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants, the California Native Plant Society (CNPS) Botanical Survey Guidelines of the California Native Plant Society, and the California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. The surveys shall be conducted at the appropriate time of year when plants are in bloom. A report summarizing the results of the protocol-level special-status plant surveys shall be submitted for review and approval to the City of Davis Community Development and Sustainability Department.* *If special-status plant species are not found, further mitigation shall not be required. If special-status plants are found within the proposed impact area and they are perennials, such as bristly sedge, then mitigation shall consist of digging up the plants and*			

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		transplanting them into a suitable mitigation area prior to construction. If special-status plants will be impacted, a mitigation plan shall be developed and approved by the City of Davis Community Development and Sustainability Department. Mitigation for the transplantation/establishment of rare plants shall result in no net loss of individual plants after a five-year monitoring period.			
4.3-2	Have a substantial adverse effect, either directly or through substantial habitat modifications, on monarch butterfly.	*SEIR 4.3-2* *If project-related vegetation removal occurs during the time when milkweed plants may host monarch eggs or caterpillars (March 15 through September 30, or otherwise identified in any future USFWS survey protocol), a preconstruction survey shall be conducted by a qualified biologist to survey for monarch eggs, larvae, and chrysalises, at most, 14 days prior to the commencement of construction. All milkweed plants within the study area shall be surveyed, as well as surrounding vegetation which may support chrysalises. A report summarizing the results of the preconstruction survey shall be submitted for review and approval to the City of Davis Community Development and Sustainability*	Davis Community Development and Sustainability Department	At most, 14 days prior to the commencement of construction	

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		Department. *If any monarch eggs, larvae, or chrysalises are found within the study area, they shall be avoided and work shall not occur within 50 feet of the monarchs until adults emerge and voluntarily leave the project site. If the eggs, larvae, or chrysalises are located in the work area and cannot be avoided, as determined by a qualified biologist in coordination with the project engineer and the City, eggs shall be allowed to hatch, and all larvae and chrysalises shall be translocated to an alternative location (e.g., containing a suitable population of larval host plants) outside of the work area. Should the species be listed under the federal Endangered Species Act (FESA) in the future, additional coordination with USFWS shall be completed, as necessary, prior to translocation.*			
4.3-3	Have a substantial adverse effect, either directly or through habitat modifications, on VELB.	*SEIR 4.3-3*	*Yolo HCP/NCCP AMM12: The project proponent will retain a qualified biologist who is familiar with valley elderberry longhorn beetle and evidence of its presence (i.e., exit holes in elderberry shrubs) to map all elderberry shrubs in and within 100 feet of the project footprint with stems that are greater than one inch in*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department	Prior to commencement of construction	

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		diameter at ground level. To avoid take of valley elderberry longhorn beetle fully, the project proponent will maintain a buffer of at least 100 feet from any elderberry shrubs with stems greater than one inch in diameter at ground level. AMM1, Establish Buffers, above [in the Yolo HCP/NCCP], describes circumstances in which a lesser buffer may be applied. For elderberry shrubs that cannot be avoided with a designated buffer distance as described above, the qualified biologist will quantify the number of stems one inch or greater in diameter to be affected, and the presence or absence of exit holes. The Yolo Habitat Conservancy will use this information to determine the number of plants or cuttings to plant on a riparian restoration site to help offset the loss, consistent with Section 6.4.2.4.1, Valley Elderberry Longhorn Beetle. Additionally, prior to construction, the project proponent will transplant elderberry shrubs identified within the project footprint that cannot be avoided. *Transplantation will only occur if a shrub cannot be avoided and, if indirectly affected, the indirect effects*			

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		would otherwise result in the death of stems or the entire shrub. If the project proponent chooses, in coordination with a qualified biologist, not to transplant the shrub because the activity would not likely result in death of stems of the shrub, then the qualified biologist will monitor the shrub annually for a five-year monitoring period. The monitoring period may be reduced with concurrence from the wildlife agencies if the latest research and best available information at the time indicates that a shorter monitoring period is warranted. If death of stems at least one inch in diameter occurs within the monitoring period, and the qualified biologist determines that the shrub is sufficiently healthy to transplant, the project proponent will transplant the shrub as described in the following paragraph, in coordination with the qualified biologist. If the shrub dies during the monitoring period, or the qualified biologist determines that the shrub is no longer healthy enough to survive transplanting, then the Yolo Habitat Conservancy will offset the shrub loss consistent with the preceding paragraph.			

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		The project proponent will transplant the shrubs into a location in the HCP/NCCP reserve system that has been approved by the Conservancy. Elderberry shrubs outside the project footprint but within the 100-foot buffer will not be transplanted. *Transplanting will follow the following measures:* 1. *Monitor: A qualified biologist will be on-site for the duration of the transplanting of the elderberry shrubs to ensure the effects on elderberry shrubs are minimized.* 2. *Timing: The project proponent will transplant elderberry plants when the plants are dormant, approximately November through the first two weeks of February, after they have lost their leaves. Transplanting during the non-growing season will reduce shock to the plant and increase transplantation success.* 3. *Transplantation procedure:* a. *Cut the plant back three to six feet from*			

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		the ground or to 50 percent of its height (whichever is taller) by removing branches and stems above this height. Replant the trunk and stems measuring one inch or greater in diameter. Remove leaves that remain on the plants. *b. Relocate plant to approved location in the reserve system, and replant as described in Section 6.4.2.4.1, Valley Elderberry Longhorn Beetle.*			
4.3-4	Have a substantial adverse effect, either directly or through habitat modifications, on Crotch's bumble bee.	*SEIR 4.3-4* *If feasible, initial ground-disturbing activities associated with the proposed project (e.g., grading, vegetation removal, staging) shall take place between September 1 and March 31 (i.e., outside the colony active period) to avoid potential impacts on special-status bumble bees. If completing all initial ground-disturbing activities between September 1 and March 31 is not feasible, then at a maximum of 14*	Davis Community Development and Sustainability Department California Department of Fish and Wildlife (CDFW)	At a maximum of 14 days prior to the commencement of construction activities, if completing all initial ground-disturbing activities between September 1 and March 31 is not feasible	

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		days prior to the commencement of construction activities, a qualified biologist with 10 or more years of experience conducting biological resource surveys within California shall conduct a preconstruction survey for Crotch's bumble bees in the area(s) proposed for impact. *The survey shall occur during the period from one hour after sunrise to two hours before sunset, with temperatures between 65 degrees Fahrenheit and 90 degrees Fahrenheit, with low wind and zero rain. If the timing of the start of construction makes the survey infeasible due to the temperature requirements, the surveying biologist shall select the most appropriate days based on the National Weather Service seven-day forecast and shall survey at a time of day that is closest to the temperature range stated above. The survey duration shall be commensurate with the extent of suitable floral resources (which represent foraging habitat) present within the area proposed for impact, and the level of effort shall be based on the metric of a minimum of one person-hour of searching per three acres of suitable floral*			

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		resources/foraging habitat. A meandering pedestrian survey shall be conducted throughout the area proposed for impact in order to identify patches of suitable floral resources. Suitable floral resources for Crotch's bumble bee include species in the following families: Apocynaceae, Asteraceae, Boraginaceae, Fabaceae, and Lamiaceae. *At a minimum, preconstruction survey methods shall include the following:* • *Search areas with floral resources for foraging Crotch's bumble bees. Observed foraging activity may indicate a nest is nearby, and therefore, the survey duration shall be increased when foraging bumble bees are present;* • *If Crotch's bumble bees are observed, watch any Crotch's bumble bees present and observe their flight patterns. Attempt to track their movements between foraging areas and the nest;*			

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		• *Visually look for nest entrances. Observe burrows, any other underground cavities, logs, or other possible nesting habitat;* • *If floral resources or other vegetation preclude observance of the nest, small areas of vegetation may be removed via hand removal, line trimming, or mowing to a height of a minimum of four inches to assist with locating the nest;* • *Look for concentrated Crotch's bumble bee activity;* • *Listen for the humming of a nest colony; and* • *If bumble bees are observed, attempt to photograph the individual and identify it to species.* *The biologist conducting the survey shall record when the survey was conducted, a general description of any suitable foraging habitat/floral resources present, a description of observed bumble bee activity, a list of bumble bee species observed, a description of any vegetation removed to facilitate the survey, and their determination of if survey*			

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		observations suggest a Crotch's bumble bee nest(s) may be present or if construction activities could result in take of Crotch's bumble bees. The report shall be submitted to the City of Davis Community Development and Sustainability Department prior to the commencement of construction activities. *If bumble bees are not located during the preconstruction survey or the bumble bees located are definitively identified as a common species (i.e., not special-status species), then further mitigation or coordination with the CDFW is not required.* *If any sign(s) of a bumble bee nest is observed, and if the species present cannot be established as a common bumble bee, then construction shall not commence until either (1) the bumble bees present are positively identified as common (i.e., not a special-status species), or (2) the completion of coordination with CDFW to identify appropriate mitigation measures, which may include, but not be limited to, waiting until the colony active season ends, establishment of nest buffers, or			

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		obtaining an Incidental Take Permit (ITP) from CDFW. *If Crotch's bumble bees are located, and after coordination with CDFW take of Crotch's bumble bees cannot be avoided, the project proponent shall obtain an ITP from CDFW, and the project proponent shall implement all conditions identified in the ITP. Mitigation required by the ITP may include, but not be limited to, the project proponent translocating nesting substrate in accordance with the latest scientific research to another suitable location (i.e., a location that supports similar or better floral resources as the impact area), enhancing floral resources on areas of the project site that will remain appropriate habitat, worker awareness training, and/or other measures specified by CDFW.*			
4.3-5	Have a substantial adverse effect, either directly or through habitat modifications, on northwestern pond turtle.	*SEIR 4.3-5*	*<u>Yolo HCP/NCCP AMM14</u>: There are no specific design requirements for western pond turtle habitat, however, project proponents must follow design requirements for the valley foothill riparian and lacustrine and riverine natural communities described in AMMs 9 and 10, which require a 100-foot (minimum) permanent buffer zone from the*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department	Prior to commencement of construction	

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		canopy drip-line (the farthest edge on the ground where water will drip from the tree canopy, based on the outer boundary of the tree canopy). If modeled upland habitat will be impacted, a qualified biologist must be present and will assess the likelihood of western pond turtle nests occurring in the disturbance area (based on sun exposure, soil conditions, and other species habitat requirements). If a qualified biologist determines that there is a moderate to high likelihood of western pond turtle nests within the disturbance area, the qualified biologist will monitor all initial ground disturbing activity for nests that may be unearthed during the disturbance, and will move out of harm's way any turtles or hatchlings found.			
4.3-6	Have a substantial adverse effect, either directly or through habitat modifications, on giant garter snake.	*SEIR 4.3-6* *Yolo HCP/NCCP AMM15: The project proponent will avoid effects on areas where planning-level surveys indicate the presence of suitable habitat for giant garter snake. To avoid effects on giant garter snake aquatic habitat, the project proponent will conduct no in-water/in-channel activity and maintain a permanent 200-foot non-disturbance buffer from the outer edge of potentially occupied aquatic*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department U.S. Fish and Wildlife Service	Prior to commencement of construction activities	

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		habitat. If the project proponent cannot avoid effects of construction activities, the project proponent will implement the measures below to minimize effects of construction projects (measures for maintenance activities are described after the following bulleted list). • *Conduct preconstruction clearance surveys using USFWS-approved methods within 24 hours prior to construction activities within identified giant garter snake aquatic and adjacent upland habitat. If construction activities stop for a period of two weeks or more, conduct another preconstruction clearance survey within 24 hours prior to resuming construction activity.* • *Restrict all construction activity involving disturbance of giant garter snake habitat to the snake's active season, May 1 through October 1. During this period, the potential for direct mortality is reduced because snakes are expected to move and avoid danger.*	(USFWS) CDFW		

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		• *In areas where construction is to take place, encourage giant garter snakes to leave the site on their own by dewatering all irrigation ditches, canals, or other aquatic habitat (i.e., removing giant garter snake aquatic habitat) between April 15 and September 30. Dewatered habitat must remain dry, with no water puddles remaining, for at least 15 consecutive days prior to excavating or filling of the habitat. If a site cannot be completely dewatered, netting and salvage of giant garter snake prey items may be necessary to discourage use by snakes.* • *Provide environmental awareness training for construction personnel, as approved by the Conservancy. Training may consist of showing a video prepared by a qualified biologist, or an in-person presentation by a qualified biologist. In addition to the video or in-person presentation, training may be*			

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		supplemented with the distribution of approved brochures and other materials that describe resources protected under the Yolo HCP/NCCP and methods for avoiding effects. • *A qualified biologist will prepare a giant garter snake relocation plan which must be approved by the Conservancy prior to work in giant garter snake habitat. The qualified biologist will base the relocation plan on criteria provided by CDFW or USFWS, through the Conservancy.* • *If a live giant garter snake is encountered during construction activities, immediately notify the project's biological monitor and USFWS and CDFW. The monitor will stop construction in the vicinity of the snake, monitor the snake, and allow the snake to leave on its own. The monitor will remain in the area for the remainder of the work day to ensure the snake is not harmed or, if it leaves the site, does not*			

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		return. If the giant garter snake does not leave on its own, the qualified biologist will relocate the snake consistent with the relocation plan described above. • *Employ the following management practices to minimize disturbances to habitat:* o *Install temporary fencing to identify and protect adjacent marshes, wetlands, and ditches from encroachment from construction equipment and personnel.* o *Maintain water quality and limit construction runoff into wetland areas through the use of hay bales, filter fences, vegetative buffer strips, or other accepted practices. No plastic, monofilament, jute, or similar erosion-control matting that*			

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		could entangle snakes or other wildlife will be permitted. *Ongoing maintenance covered activities by local water and flood control agencies typically involve removal of vegetation, debris, and sediment from water conveyance canals as well as resloping, rocking, and stabilizing the canals that serve agricultural water users. Maintenance of these conveyance facilities can typically occur only from mid-January through April when conveyance canals and ditches are not in service by the agency, although some drainages are used for storm conveyance during the winter and are wet all year. This timing is during the giant garter snake's inactive period. This is when snakes may be using underground burrows and are most vulnerable to take because they are unable to move out of harm's way. Maintenance activities, therefore, will be limited to the giant garter snake's active season (May 1 to October 1) when possible. All personnel involved in maintenance activities within giant garter snake habitat will first participate in environmental*			

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		awareness training for giant garter snake, as described above for construction-related activities. To minimize the take of giant garter snake, the local water or flood control agency will limit maintenance of conveyance structures located within modeled giant garter snake habitat (Appendix A, Covered Species Accounts) to clearing one side along at least 80 percent of the linear distance of canals and ditches during each maintenance year (e.g., the left bank of a canal is maintained in the first year and the right bank in the second year). To avoid collapses when resloping canal and ditch banks composed of heavy clay soils, clearing will be limited to one side of the channel during each maintenance year. *For channel maintenance activities conducted within modeled habitat for giant garter snake, the project proponent will place removed material in existing dredged sites along channels where prior maintenance dredge disposal has occurred. For portions of channels that do not have previously used spoil disposal sites and where surveys have been conducted to*			

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			confirm that giant garter snakes are not present, removed materials may be placed along channels in areas that are not occupied by giant garter snake and where materials will not re-enter the canal because of stormwater runoff. *Modifications to this AMM may be made with the approval of the Conservancy, USFWS, and CDFW.*			
4.3-7	Have a substantial adverse effect, either directly or through habitat modifications, on tricolored blackbird.	*SEIR 4.3-7*	*Yolo HCP/NCCP AMM21: The project proponent will retain a qualified biologist to identify and quantify (in acres) tricolored blackbird nesting and foraging habitat (as defined in Appendix A, Covered Species Accounts) within 1,300 feet of the footprint of the covered activity. If a 1,300-foot buffer from nesting habitat cannot be maintained, the qualified biologist will check records maintained by the Conservancy (which will include CNDDB data, and data from the tricolored blackbird portal) to determine if tricolored blackbird nesting colonies have been active in or within 1,300 feet of the project footprint during the previous five years. If there are no records of nesting tricolored blackbirds on the site, the qualified biologist will conduct visual surveys to determine if*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department USFWS CDFW	Prior to the commencement of construction	

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		an active colony is present, during the period from March 1 to July 30, consistent with protocol described by Kelsey (2008). *Operations and maintenance activities or other temporary activities that do not remove nesting habitat and occur outside the nesting season (March 1 to July 30) do not need to conduct planning or construction surveys or implement any additional avoidance measures.* *If an active tricolored blackbird colony is present or has been present within the last five years within the planning-level survey area, the project proponent will design the project to avoid adverse effects within 1,300 feet of the colony site(s), unless a shorter distance is approved by the Conservancy, USFWS, and CDFW. If a shorter distance is approved, the project proponent will still maintain a 1,300-foot buffer around active nesting colonies during the nesting season but may apply the approved lesser distance outside the nesting season. Adjacent parcels under different land ownership will be surveyed only if access is granted or if the parcels are visible from*			

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			authorized areas.			
4.3-8	Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl.	*4.6-2*	*Yolo HCP/NCCP AMM18: The project proponent will retain a qualified biologist to conduct planning-level surveys and identify western burrowing owl habitat (as defined in Appendix A, Covered Species Accounts) within or adjacent to (i.e., within 500 feet of) a covered activity. If habitat for this species is present, additional surveys for the species by a qualified biologist are required, consistent with CDFW guidelines (Appendix L).* *If burrowing owls are identified during the planning-level survey, the project proponent will minimize activities that will affect occupied habitat as follows. Occupied habitat is considered fully avoided if the project footprint does not impinge on a nondisturbance buffer around the suitable burrow. For occupied burrowing owl nest burrows, this nondisturbance buffer could range from 150 to 1,500 feet (Table 4-2, Recommended Restricted Activity Dates and Setback Distances by Level of Disturbance for Burrowing Owls [incorporated as Table 4.3-5 of this chapter]), depending on the time of year and the level of disturbance,*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department USFWS CDFW	Prior to the commencement of construction	

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		based on current guidelines (California Department of Fish and Game 2012). The Yolo HCP/NCCP generally defines low, medium, and high levels of disturbances of burrowing owls as follows. • *Low: Typically 71-80 dB, generally characterized by the presence of passenger vehicles, small gas-powered engines (e.g., lawn mowers, small chain saws, portable generators), and high-tension power lines. Includes electric hand tools (except circular saws, impact wrenches and similar). Management and enhancement activities would typically fall under this category. Human activity in the immediate vicinity of burrowing owls would also constitute a low level of disturbance, regardless of the noise levels.* • *Moderate: Typically 81-90 dB, and would include medium- and large-sized construction equipment, such as backhoes, front end loaders, large pumps and generators, road graders,*			

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		dozers, dump trucks, drill rigs, and other moderate to large diesel engines. Also includes power saws, large chainsaws, pneumatic drills and impact wrenches, and large gasoline-powered tools. Construction activities would normally fall under this category. • *High: Typically 91-100 dB, and is generally characterized by impacting devices, jackhammers, compression ("jake") brakes on large trucks, and trains. This category includes both vibratory and impact pile drivers (smaller steel or wood piles) such as used to install piles and guard rails, and large pneumatic tools such as chipping machines. It may also include large diesel and gasoline engines, especially if in concert with other impacting devices. Felling of large trees (defined as dominant or subdominant trees in mature forests), truck horns, yarding tower whistles, and muffled or underground explosives are*			

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		also included. Very few covered activities are expected to fall under this category, but some construction activities may result in this level of disturbance.			

Table 4.3-5
Recommended Restricted Activity Dates and Setback Distances by Level of Disturbance for Burrowing Owls

	Level of Disturbance (feet) from Occupied Burrows		
Time of Year	**Low**	**Medium**	**High**
April 1-August 15	600	1,500	1,500
August 16-October 15	600	600	1,500
October 16-March 31	150	300	1,500

Source: Yolo Habitat Conservancy. Yolo County Habitat Conservation Plan/Natural Community Conservation Plan [Table 4-2]. April 2018.

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		The project proponent may qualify for a reduced buffer size, based on existing vegetation, human development, and land use, if agreed upon by CDFW and USFWS (California Department of Fish and Game 2012). *If the project does not fully avoid direct and indirect effects on nesting sites (i.e., if the project cannot adhere to the buffers described above), the project proponent will retain a qualified biologist to conduct preconstruction surveys and document the presence or absence of western burrowing owls that could be affected by the covered activity. Prior to any ground disturbance related to covered activities, the qualified biologist will conduct the preconstruction surveys within three days prior to ground disturbance in areas identified in the planning-level surveys as having suitable burrowing owl burrows, consistent with CDFW preconstruction survey guidelines (Appendix L, Take Avoidance Surveys). The qualified biologist will conduct the preconstruction surveys three days prior to ground disturbance. Time lapses between ground disturbing activities will trigger*			

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		subsequent surveys prior to ground disturbance. *If the biologist finds the site to be occupied by western burrowing owls during the breeding season (February 1 to August 31), the project proponent will avoid all nest sites, based on the buffer distances described above, during the remainder of the breeding season or while the nest is occupied by adults or young (occupation includes individuals or family groups that forage on or near the site following fledging). Construction may occur inside of the disturbance buffer during the breeding season if the nest is not disturbed and the project proponent develops an AMM plan that is approved by the Conservancy, CDFW, and USFWS prior to project construction, based on the following criteria:* • *The Conservancy, CDFW, and USFWS approves the AMM plan provided by the project proponent.* • *A qualified biologist monitors the owls for at least three days prior to construction to determine baseline nesting*			

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		and foraging behavior (i.e., behavior without construction). • *The same qualified biologist monitors the owls during construction and finds no change in owl nesting and foraging behavior in response to construction activities.* • *If the qualified biologist identifies a change in owl nesting and foraging behavior as a result of construction activities, the qualified biologist will have the authority to stop all construction related activities within the non-disturbance buffers described above. The qualified biologist will report this information to the Conservancy, CDFW, and USFWS within 24 hours, and the Conservancy will require that these activities immediately cease within the non-disturbance buffer. Construction cannot resume within the buffer until the adults and juveniles from the occupied burrows have moved out of the project site,*			

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		and the Conservancy, CDFW, and USFWS agree. • *If monitoring indicates that the nest is abandoned prior to the end of nesting season and the burrow is no longer in use by owls, the project proponent may remove the nondisturbance buffer, only with concurrence from CDFW and USFWS. If the burrow cannot be avoided by construction activity, the biologist will excavate and collapse the burrow in accordance with CDFW's 2012 guidelines to prevent reoccupation after receiving approval from the wildlife agencies.* *If evidence of western burrowing owl is detected outside the breeding season (December 1 to January 31), the project proponent will establish a non-disturbance buffer around occupied burrows, consistent with Table 4-2 (incorporated as Table 4.3-5 of this chapter), as determined by a qualified biologist. Construction activities within the disturbance buffer are allowed if the following criteria are met to prevent owls from*			

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		abandoning important overwintering sites: • *A qualified biologist monitors the owls for at least three days prior to construction to determine baseline foraging behavior (i.e., behavior without construction).* • *The same qualified biologist monitors the owls during construction and finds no change in owl foraging behavior in response to construction activities.* • *If there is any change in owl roosting and foraging behavior as a result of construction activities, these activities will cease within the buffer.* • *If the owls are gone for at least one week, the project proponent may request approval from the Conservancy, CDFW, and USFWS for a qualified biologist to excavate and collapse usable burrows to prevent owls from reoccupying the site if the burrow cannot be avoided by construction activities. The*			

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		qualified biologist will install one-way doors for a 48-hour period prior to collapsing any potentially occupied burrows. After all usable burrows are excavated, the buffer will be removed and construction may continue. *Monitoring must continue as described above for the nonbreeding season as long as the burrow remains active.* *A qualified biologist will monitor the site, consistent with the requirements described above, to ensure that buffers are enforced and owls are not disturbed. Passive relocation (i.e., exclusion) of owls has been used in the past in the Plan Area to remove and exclude owls from active burrows during the nonbreeding season (Trulio 1995). Exclusion and burrow closure will not be conducted during the breeding season for any occupied burrow. If the Conservancy determines that passive relocation is necessary, the project proponent will develop a burrowing owl exclusion plan in consultation with CDFW biologists. The methods will be designed as described in the species*			

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		monitoring guidelines (California Department of Fish and Game 2012) and consistent with the most up-to-date checklist of passive relocation techniques. This may include the installation of one-way doors in burrow entrances by a qualified biologist during the nonbreeding season. These doors will be in place for 48 hours and monitored twice daily to ensure that the owls have left the burrow, after which time the biologist will collapse the burrow to prevent reoccupation. Burrows will be excavated using hand tools. During excavation, an escape route will be maintained at all times. This may include inserting an artificial structure, such as piping, into the burrow to prevent collapsing until the entire burrow can be excavated and it can be determined that no owls are trapped inside the burrow. The Conservancy may allow other methods of passive or active relocation, based on best available science, if approved by the wildlife agencies. Artificial burrows will be constructed prior to exclusion and will be created less than 300 feet from the existing burrows on lands that are protected as part of the reserve system.			

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4.3-9	Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk and white-tailed kite.	*4.6-5*	*Yolo HCP/NCCP AMM16: The project proponent will retain a qualified biologist to conduct planning-level surveys and identify any nesting habitat present within 1,320 feet of the project footprint. Adjacent parcels under different land ownership will be surveyed only if access is granted or if the parcels are visible from authorized areas.* *If a construction project cannot avoid potential nest trees (as determined by the qualified biologist) by 1,320 feet, the project proponent will retain a qualified biologist to conduct preconstruction surveys for active nests consistent, with guidelines provided by the Swainson's Hawk Technical Advisory Committee (2000), between March 15 and August 30, within 15 days prior to the beginning of the construction activity. The results of the survey shall be submitted to the Conservancy and CDFW. If active nests are found during preconstruction surveys, a 1,320-foot initial temporary nest disturbance buffer shall be established. If project related activities within the temporary nest disturbance buffer are determined to be necessary during the nesting*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department USFWS CDFW	Prior to the commencement of construction	

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		season, then the qualified biologist will monitor the nest and will, along with the project proponent, consult with CDFW to determine the best course of action necessary to avoid nest abandonment or take of individuals. Work may be allowed only to proceed within the temporary nest disturbance buffer if Swainson's hawk or white-tailed kite are not exhibiting agitated behavior, such as defensive flights at intruders, getting up from a brooding position, or flying off the nest, and only with the agreement of CDFW and USFWS. The designated on-site biologist/monitor shall be on-site daily while construction-related activities are taking place within the 1,320-foot buffer and shall have the authority to stop work if raptors are exhibiting agitated behavior. Up to 20 Swainson's hawk nest trees (documented nesting within the last 5 years) may be removed during the permit term, but they must be removed when not occupied by Swainson's hawks. *For covered activities that involve pruning or removal of a potential Swainson's hawk or white-tailed kite nest tree, the project proponent will*			

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		conduct preconstruction surveys that are consistent with the guidelines provided by the Swainson's Hawk Technical Advisory Committee (2000). If active nests are found during preconstruction surveys, no tree pruning or removal of the nest tree will occur during the period between March 1 and August 30 within 1,320 feet of an active nest, unless a qualified biologist determines that the young have fledged and the nest is no longer active.			
4.3-10	Have a substantial adverse effect, either directly or through habitat modifications, on other nesting birds and raptors protected under the MBTA and CFGC.	*4.6-3* *The removal of any buildings, trees, or shrubs shall occur from September 1 through December 15, outside of the avian nesting season. If removal of buildings, trees, or shrubs occurs, or construction begins between February 1 and August 31 (nesting season for passerine or non-passerine land birds) or between December 15 and August 31 (nesting season for raptors), a nesting bird survey shall be performed by a qualified ornithologist throughout the project site and all accessible areas within a 500-foot radius of proposed construction areas, at most, 14 days prior to the removal or disturbance of a potential nesting structure, tree, or shrub, or the initiation of other*	Davis Community Development and Sustainability Department CDFW	At most, 14 days prior to the removal or disturbance of a potential nesting structure, tree, or shrub, or the initiation of other construction activities, if removal of buildings, trees, or shrubs occurs, or construction begins between February 1 and August 31 or between December 15 and August 31	

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		construction activities. During this survey, a qualified ornithologist shall inspect all potential nesting habitat (trees, shrubs, structures, grasslands, etc.) for nests in and immediately adjacent to the impact areas. If a break in construction activity of more than 14 days occurs, then subsequent surveys shall be conducted. A report of the survey findings shall be provided to the City of Davis Community Development and Sustainability Department and CDFG within 30 days of the completed survey and is valid for one construction season. If nests are not found, further mitigation is not required. *If active raptor nests are found, construction activities shall not take place within 500 feet of the nest until the young have fledged. If active songbird nests are found, a 100-foot non-disturbance buffer shall be established. The non-disturbance buffers may be reduced if a smaller, sufficiently protective buffer is approved by the City after taking into consideration the natural history of the species of bird nesting, the proposed activity level adjacent to the nest, the nest occupants' habituation*			

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		to existing or ongoing activity, and nest concealment (i.e., whether visual or acoustic barriers occur between the proposed activity and the nest). A qualified ornithologist may visit the nest, as needed, to determine when the young have fledged the nest and are independent of the site or the nest can be left undisturbed until the end of the nesting season. *If the nest buffer is reduced but construction activities cause a nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest in a way that would be considered a result of construction activities, then the exclusionary buffer shall be increased such that activities are far enough from the nest to stop the agitated behavior. The revised non-disturbance buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified ornithologist in consultation with the City.* *Construction activities may only resume within the non-disturbance buffer after a follow-up survey by the ornithologist has been conducted and*			

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		a report has been prepared indicating that the nest (or nests) are not active any longer, and that new nests have not been identified.			
4.3-11	Have a substantial adverse effect, either directly or through habitat modifications, on roosting bats.	*4.6-4* *A pre-construction survey for roosting bats shall be performed by a qualified biologist within 14 days prior to any removal of trees or structures on the site that would occur during the breeding season (April through August). A report summarizing the results of the preconstruction roosting bat survey shall be submitted for review and approval to the City of Davis Community Development and Sustainability Department. Surveys shall be repeated if project-related disturbance is delayed more than 14 days past previous survey date. If no active roosts are found, then no further action would be warranted.* *If roosting bats are found, exclusion shall be conducted by the qualified biologist in coordination with CDFW. Exclusion and bat habitat removal shall not occur during the breeding season in order to minimize disturbance to, or abandonment of, young bats. Methods may include acoustic monitoring, evening emergence surveys, and the utilization of two-step tree removal*	Davis Community Development and Sustainability Department	Within 14 days prior to any removal of trees or structures on the site that would occur during the breeding season (April through August)	

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			supervised by the qualified biologist. Two-step tree removal involves removal of all branches that do not provide roosting habitat on the first day, and then the next day cutting down the remaining portion of the tree. Building exclusion methods may include such techniques as installation of passive one-way doors, or the installation of netting when the bats are not present to prevent their reoccupation. Once the bats have been excluded, tree or building removal may occur.			
4.3-12	Have a substantial adverse effect, either directly or through habitat modifications, on American badger.	*4.6-1(a)*	*Within 48 hours prior to the commencement of construction activities, a qualified biologist shall conduct pre-construction surveys for American badger in all construction areas identified as potential habitat located within the project area two weeks prior to initiation of construction activities. If American badger is not found, further mitigation shall not be required. If an American badger or active burrow, indicated by the presence of badger sign (i.e. suitable shape and burrow-size, scat) is found within the construction area during pre-construction surveys, the CDFG shall be consulted to obtain permission for animal relocation. A report summarizing the results of the*	Davis Community Development and Sustainability Department CDFW	Within 48 hours prior to the commencement of construction activities	

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		preconstruction survey shall be submitted for review and approval to the City of Davis Community Development and Sustainability Department.			
		4.6-1(b) *If the qualified biologist determines that potential dens may be active, the entrances of the dens shall be blocked with soil, sticks, and debris for three to five days to discourage use of these dens prior to project disturbance. The den entrances shall be blocked to an incrementally greater degree over the three to five day period. After the qualified biologist determines that badgers have stopped using active dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent re-use during construction.*	Davis Community Development and Sustainability Department	Within 48 hours prior to the commencement of construction activities	
		4.6-1(c) *If badger are determined to be actively using the site, a qualified biologist shall provide project contractors and construction crews responsible for site demolition and/or grading operations with a worker-awareness program before any ground disturbance work within the project area. This program shall be used to describe the species, its*	Davis Community Development and Sustainability Department	Within 48 hours prior to the commencement of construction activities	

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			habits and habitats, its legal status and required protection, and all applicable mitigation measures.			
4.3-16	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	*4.6-7(a)*	*Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, a tree preservation plan, in compliance with Ordinance 37.03.010 in the City of Davis Municipal Code, shall be submitted to the Community Development Department and Public Works Department for review and approval, which shall ensure the following measures:* • *Trees shall be cordoned off with chain link fence prior to construction as specified;* • *Soil compaction under trees is to be avoided;* • *The fence shall prevent equipment traffic and storage under the trees and should extend beyond the drip-line;* • *Excavation within this zone shall be accomplished by hand, and roots ½" and larger shall be preserved;* • *Proper fertilization and irrigation prior to and during*	Davis Community Development and Sustainability Department Davis Public Works Department	Prior to commencement of construction-related activities	

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		the construction period shall be provided as specified; • *New landscaping under existing trees shall be carefully planned to avoid any grade changes and any excess moisture in trunk area. Existing plants which have compatible irrigation requirements and which complement the trees' color, texture and form are to be saved;* • *Trenching within the drip-line shall be performed only with prior approval of the Park and General Services Department. Boring is preferred when feasible;* • *All paving plans and specifications shall clearly prohibit the use of soil sterilants adjacent to preserved trees; and* • *Grade changes greater than one foot within the drip-line shall be avoided, and nothing other than a saw shall be used for root cutting.*			
		4.6-7(b) *Prior to commencement of construction-related activities for the*		Prior to commencement of	

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		project including, but not limited to, grading, staging of materials, or earthmoving activities, a page shall be included with the project plans, which indicates all of the trees identified. The tree report with corresponding descriptions of each tree by species, health, etc. should also be included. In addition, notes shall be included on the plans which clearly state protection procedures for trees that are to be preserved. Any tree care practices, such as cutting of roots, pruning the top, etc., shall be adequately described and shall have the approval of a representative of the Public Works Utilities and Operations Department prior to execution. In the event of damage to existing trees, a penalty clause shall be replacement tree(s) of equal size in D.B.H. unless specified otherwise by the Parks and General Services Department.	Public Works Utilities and Operations Department	construction-related activities	
		4.6-7(c) *Trees identified on the site as Trees of Significance, that are proposed for removal, shall be replaced either on site or at a nearby site deemed acceptable by the Public Works Director. The Director may require an in-lieu fee to be paid to the City of Davis Tree Preservation Fund*	Public Works Director	Prior to commencement of construction-related activities	

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		instead of or in addition to tree replacement. The recommendations for avoidance of trees contained in Chapter 37 of the City of Davis Municipal Code (Tree Planting, Preservation, and Protection) should be adopted if feasible. If infeasible, the applicant should identify trees slated for removal on the site plan, including those with encroachments within 30-feet of the drip line of trees and develop a tree replacement plan that shall be reviewed and approved by the City prior to issuance of the grading permit. Tree replacement shall be implemented according to options outlined in Section 37.03.070 of the City's Municipal Code as follows: *(i) Replanting a tree(s) on site: Trees shall be planted in number and size so that there is no net loss in tree diameter at breast height (DBH). For example, if one tree is removed with a 12-inch DBH size, mitigation may consist of a replacement of equal size, two trees each 6-inch DBH, or four trees each 3-inch DBH. The replanted tree(s) shall be*			

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		minimum 5 gallon size and of a species that will eventually equal or exceed the removed tree in size. *(ii) Replanting a tree(s) off site: If there is insufficient space on the property for the replacement tree(s), required planting shall occur on other property in the applicant's ownership or in City-owned open space or park, subject to the approval of the City Arborist and authorized property owners.* *(iii) Payment to the Tree Preservation Fund in lieu of replacement: If in the City Arborist's determination no feasible alternative exists to plant the required mitigation, or there are other considerations for alternative mitigation, the applicant shall pay into the Tree Preservation Fund an amount determined by the Director based upon the ISA appraisal guidelines or other approved method. If the Director approves another method of appraisal guideline, the Director shall*			

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			publish notice of that approval and notify the permit applicant at the time the permit application is issued.			
4.3-17	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.	*SEIR 4.3-17(a)*	*Yolo HCP/NCCP AMM3: Where natural communities and covered species habitat are present, workers will confine land clearing to the minimum area necessary to facilitate construction activities. Workers will restrict movement of heavy equipment to and from the project site to established roadways and driveways to minimize natural community and covered species habitat disturbance. The project proponent will clearly identify boundaries of work areas using temporary fencing or equivalent and will identify areas designated as environmentally sensitive. All construction vehicles, other equipment, and personnel will avoid these designated areas.*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department	Prior to the commencement of construction	
		SEIR 4.3-17(b)	*Yolo HCP/NCCP AMM4: To prevent injury and mortality of giant garter snake, western pond turtle, and California tiger salamander, workers will cover open trenches and holes associated with implementation of covered activities that affect habitat*	Yolo Habitat Conservancy Davis Community Development and	Prior to the commencement of construction	

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		for these species or design the trenches and holes with escape ramps that can be used during non-working hours. The construction contractor will inspect open trenches and holes prior to filling and contact a qualified biologist to remove or release any trapped wildlife found in the trenches or holes.	Sustainability Department		
		SEIR 4.3-17(c) *Yolo HCP/NCCP AMM5: Workers will minimize the spread of dust from work sites to natural communities or covered species habitats on adjacent lands.*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department	During project construction	
		SEIR 4.3-17(d) *Yolo HCP/NCCP AMM6: All construction personnel will participate in a worker environmental training program approved/authorized by the Conservancy and administered by a qualified biologist. The training will provide education regarding sensitive natural communities and covered species and their habitats, the need to avoid adverse effects, state and federal protection, and the legal implications of violating the FESA and NCCPA Permits. A pre-recorded*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department	Prior to the commencement of construction	

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		video presentation by a qualified biologist shown to construction personnel may fulfill the training requirement.			
		SEIR 4.3-17(e) *Yolo HCP/NCCP AMM7: Workers will direct all lights for nighttime lighting of project construction sites into the project construction area and minimize the lighting of natural habitat areas adjacent to the project construction area.*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department	During project construction	
		SEIR 4.3-17(f) *Yolo HCP/NCCP AMM8: Project proponents should locate construction staging and other temporary work areas for covered activities in areas that will ultimately be a part of the permanent project development footprint. If construction staging and other temporary work areas must be located outside of permanent project footprints, they will be located either in areas that do not support habitat for covered species or are easily restored to prior or improved ecological functions (e.g., grassland and agricultural land). Construction staging and other temporary work areas located outside of project footprints will be sited in*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department	Prior to the commencement of construction	

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		areas that avoid adverse effects on the following: • *Serpentine, valley oak woodland, alkali prairie, vernal pool complex, valley foothill riparian, and fresh emergent wetland land cover types.* • *Occupied western burrowing owl burrows.* • *Nest sites for covered bird species and all raptors, including noncovered raptors, during the breeding season.* *Project proponents will follow specific AMMs for sensitive natural communities (Section 4.3.3, Sensitive Natural Communities) and covered species (Section 4.3.4, Covered Species) in temporary staging and work areas. For establishment of temporary work areas outside of the project footprint, project proponents will conduct surveys to determine if any of the biological resources listed above are present. Within one year following removal of land cover, project proponents will restore temporary work and staging areas to a condition equal to or greater than*			

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			the covered species habitat function of the affected habitat. Restoration of vegetation in temporary work and staging areas will use clean, native seed mixes approved by the Conservancy that are free of noxious plant species seeds.			
		SEIR 4.3-17(g)	*To ensure avoidance and minimization of impacts to the species covered by the Yolo HCP/NCCP, which could be impacted by the project, the project applicant shall obtain coverage under the Yolo HCP/NCCP for on-site, and as may be determined necessary by Yolo Habitat Conservancy, for off-site infrastructure work, for each phase of development. In addition to payment of any applicable HCP/NCCP fees, the applicant shall implement Yolo HCP/NCCP Avoidance and Minimization Measures identified in Mitigation Measures SEIR 4.3-3, SEIR 4.3-5, SEIR 4.3-6, SEIR 4.3-7, 4.6-2, 4.6-5, and SEIR 4.3-17(a) through SEIR 4.3-17(f).*	Yolo Habitat Conservancy Davis Community Development and Sustainability Department USFWS CDFW	Prior to the commencement of construction	
4.4 Noise						
4.4-1	Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of	*4.5-3*	*Compliance with the following measures shall be incorporated within the construction documents prior to issuance of building permits with specific criteria and standards to*	Davis Community Development and Sustainability	Prior to issuance of any building permits	

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	standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	*be reviewed and approved by the City of Davis Community Development and Sustainability Department and Public Works Department:* • *Construction activities shall be scheduled to occur during normal daytime working hours (i.e., 7:00 AM to 7:00 PM Monday through Friday and 8:00 AM to 8:00 PM Saturday and Sunday). These criteria shall be included in the Improvement Plans prior to initiation of construction. Exceptions to allow expanded construction activity hours shall be reviewed on a case-by-case basis as determined by the Community Development Director;* • *Nearby residences shall be notified of construction schedules as part of a Notification Program subject to review and approval by the City of Davis, so that arrangements can be made, if desired, to limit their exposure to short-term increases in ambient noise*	Department Public Works Department		

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		levels; • *All mobile or fixed noise-producing equipment used on the project site shall comply with applicable federal, State, or local agency regulations while in the course of project activity;* • *Electrically powered equipment shall be used instead of pneumatic or internal-combustion-powered equipment, where feasible;* • *All heavy construction equipment and all stationary noise sources (such as diesel generators) shall be fitted with factory-specified mufflers and be maintained in good working condition; and* • *Equipment warm up areas, water tanks, material stockpiles, mobile equipment staging, parking, maintenance areas, and equipment storage areas shall be located in an area as far away from existing residences as feasible.*			

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4.4-2	Generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	*SEIR 4.4-2* *In conjunction with submittal of a site plan for the USA Pentathlon Training Facility, pool complex, and obstacle course, the project applicant shall submit an acoustical noise study, which shall document the predicted average (L_{eq}) and maximum (L_{max}) noise levels associated with the facilities' public address (PA) system at the nearest sensitive receptors to the pool complex and obstacle course. The acoustical noise study shall include recommendations for reducing noise levels projected to exceed the City's applicable noise standards set forth in Davis Municipal Code Article 24.02 and the Davis General Plan's day/night average noise-level threshold of 60 dBA L_{dn} within outdoor activity areas of residential land uses. Such recommendations could include, but not necessarily be limited to, the following:* • *Acoustic noise barriers;* • *Monitoring of PA noise levels during national, world cup, and other organized swimming events to ensure such activities do not exceed standards contained in the City of Davis Noise*	Davis Community Development and Sustainability Department	In conjunction with submittal of a site plan for the USA Pentathlon Training Facility, pool complex, and obstacle course	

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		Ordinance; • *Limitations on the hours during which the PA system may be used; and* • *Disclosure statements provided to neighboring residences of the potential for elevated noise levels during organized events held at the pool complex.* *The acoustic noise study shall be submitted for review and approval to the City of Davis Community Development and Sustainability Department prior to issuance of building permits.*			
4.5 Public Services and Utilities					
4.5-1	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection	*4.9-4* *Prior to the issuance of each building permit, the applicant shall pay the applicable public safety impact fee for the provision of facilities needed to provide adequate fire protection service to the proposed project. These facilities may include but are not necessarily limited to a fourth City fire station and a ladder truck.*	Davis Community Development and Sustainability Department Davis Fire Chief	Prior to the issuance of each building permit	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
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	services.				
4.5-3	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools.	*4.9-6* *Prior to the issuance of building permits, the applicant shall show proof to the Community Development Department of payment of current Proposition 1A/SB50 school impacts fees.*	Davis Community Development and Sustainability Department	Prior to the issuance of building permits	
4.5-4	Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or performance objectives for parks, or other public facilities; or result in an increase in the use of existing neighborhood and regional parks or	*4.9-8* *Prior to the issuance of building permits, the applicant shall pay in-lieu Quimby fees for required park acreage.*	Davis Community Development and Sustainability Department	Prior to the issuance of building permits	

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	other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.					
4.5-5	Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	*4.9-3*	*In conjunction with the submittal of improvement plans for the proposed project, the applicant shall submit a design-level wastewater report for the proposed project that demonstrates how the project's wastewater will be delivered to the Wastewater Treatment Plant. Included in the report shall be a determination of the capacity of downstream sewer lines and what improvements, if any, need to be constructed to accommodate and convey the project's additional wastewater, and the construction and operational costs of the options. The wastewater report shall be subject to approval by the City Engineer. The applicant shall be required to fully fund and construct the necessary wastewater improvements*	City Engineer	In conjunction with the submittal of improvement plans for the proposed project	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
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		determined by the wastewater report.			
		SEIR 4.5-5 *In conjunction with the submittal of improvement plans for the Palomino Place Project, the applicant shall submit a design-level water report for the proposed project that demonstrates how the project's water lines meet the City's applicable standards related to domestic water and fire flow demands, as well as how the proposed water lines will provide adequate water flows during each phase of development. The water report shall be subject to approval by the City Engineer. The applicant shall be required to fully fund and construct the necessary water improvements determined by the water report.*	City Engineer	In conjunction with the submittal of improvement plans for the proposed project	
4.6 Transportation					
4.6-1	Conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities.	*4.3-5* *Prior to any on-site construction activities, the project applicant shall prepare a Construction Traffic Management Plan subject to the review and approval by the City Engineer. The Construction Traffic Management Plan shall include all measures for temporary traffic control, temporary signage and striping, location points for ingress and egress of construction vehicles, haul routes, staging areas, and shall*	City Engineer	Prior to any on-site construction activities	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		provide for the timing of construction activity that appropriately limits hours during which large construction equipment may be brought onto or taken off of the site.			
4.6-2	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway, bicycle, and pedestrian facilities.	*4.3-3* *Prior to approval of improvement plans, the project applicant shall ensure that the pathway and sidewalk network meets ADA accessibility requirements, subject to the review and approval by the City Engineer.*	City Engineer	Prior to approval of the improvement plans	
		SEIR 4.6-2(a) *Prior to the commencement of operations at the aquatic complex or the commencement of operations at the USA Pentathlon Training Facility (whichever occurs first), the project applicant shall construct a contiguous bikeway facility with dedicated physical space for bicyclists between East Covell Boulevard and the project non-residential uses. Potential improvement options include the following:* *1) Install Class II bike lanes on the new north leg of the East Covell Boulevard/Monarch Lane intersection; or* *2) Construct a Class I shared-use path between East Covell Boulevard and the*	City Engineer	Prior to the commencement of operations at the aquatic complex or the commencement of operations at the USA Pentathlon Training Facility (whichever occurs first)	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		project non-residential uses within the Wildhorse Urban Agriculture Transition Area along the easterly project site frontage. *Implementation of these improvements, or a set of improvements of equal effectiveness as determined by the City of Davis City Engineer, would reduce the potential for conflicts involving bicyclists that could otherwise be caused by the project and promote bicycle travel to and from the project site.*			
		SEIR 4.6-2(b) *Prior to issuance of building permit for the 75th market-rate residential unit at the project site, the commencement of operations at the aquatic complex, or the commencement of operations at the USA Pentathlon Training Facility (whichever occurs first), the project applicant shall install a traffic signal at the East Covell Boulevard/Monarch Lane intersection. The purpose of the traffic signal is to provide temporal separation between bicyclists, pedestrians, and conflicting vehicular movements (e.g., through the*	City Engineer	Prior to issuance of building permit for the 75th market-rate residential unit at the project site, the commencement of operations at the aquatic complex, or the commencement of operations at the USA Pentathlon Training Facility (whichever occurs first)	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		provision of pedestrian crossing phases). As part of this mitigation measure, the applicant shall also construct an eastbound left-turn pocket with a queue storage length of 105 feet and install designated bicycle and pedestrian facilities and crossings. *The specific intersection geometrics, lane configurations, bicycle and pedestrian accommodations, and signal phasing are subject to review and approval by the City of Davis City Engineer.* *Note that this intersection would meet the four-hour vehicular volume signal warrant (CA MUTCD Warrant 2) and the peak hour signal warrant (CA MUTCD Warrant 3B) under Existing Plus Project conditions.* *Implementation of these improvements, or a set of improvements of equal effectiveness as determined by the City of Davis City Engineer, would reduce the potential for conflicts involving bicyclists or pedestrians that could otherwise be caused by the project and promote bicycle and pedestrian travel to and from the project site.*			

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
4.6-4	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)..	*SEIR 4.6-4* *The project applicant shall implement the following TDM strategies to reduce the number of vehicle trips that would be generated by the project residential component, subject to review and approval by the City Engineer. The timing for each strategy is set forth below:* *1)* ***Implement subsidized or discounted transit program (CAPCOA Handbook Strategy T-9)*** *– This measure would provide subsidized or discounted, or free transit passes for residents of the project's 45 affordable housing dwelling units. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT.* *Concurrent with the occupancy of each multi-family residential unit, the project applicant shall*	City Engineer	Concurrent with the occupancy of each multi-family residential unit	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		provide free transit passes to residents of the project's 45 affordable housing dwelling units. According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.16 percent. 2) ***Implement carshare program (CAPCOA Handbook Strategy T-21-A)*** *– This measure would increase carshare access in the project site by deploying conventional carshare vehicles. Examples include programs like Zipcar and GIG Car Share. Carsharing offers people convenient access to a vehicle for personal or commuting purposes, which helps encourage transportation alternatives and reduces vehicle ownership, thereby avoiding VMT.* *Prior to occupancy of the first phase of the project residential component, the project applicant shall partner with a carshare service*		Prior to occupancy of the first phase of the project residential component	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		provider and ensure that carshare vehicles are available to project residents. Proof of completion of this measure shall be provided to the City of Davis. *According to CAPCOA, this strategy would have a maximum reduction potential of 0.15 percent of project VMT.* *3)* ***Implement electric bikeshare program (CAPCOA Handbook Strategy T-22-B)*** *– This measure would establish an electric bikeshare program. Electric bikeshare programs provide users with on-demand access to electric-pedal-assist bikes for short-term rentals. This encourages mode shift from vehicles to electric bicycles, displacing VMT and reducing GHG emissions.* *Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project*		Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		components, whichever occurs first, the project applicant shall provide the City of Davis with evidence of an agreement for a hub with a bikeshare and scootershare system operator for the project. Currently, Spin provides bikeshare and scootershare service to the entirety of the City of Davis and the UC Davis campus. Accordingly, the project site is presumed to be incorporated into the Spin service area. *Prior to issuance of an occupancy permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the applicant shall construct a hub for use by the bikeshare and scootershare system operator within the multi-family housing or USA Pentathlon Training Facility.* *According to CAPCOA, this strategy would reduce project-generated residential*			

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		VMT per capita by 0.05 percent. *4)* ***Implement scootershare program (CAPCOA Handbook Strategy T-22-C)*** *– This measure would establish a scootershare program. Scootershare programs provide users with on-demand access to electric scooters for short-term rentals. This encourages a mode shift from vehicles to scooters, displacing VMT and thus reducing GHG emissions.* *Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the project applicant shall provide the City of Davis with evidence of an agreement for a hub with a bikeshare and scootershare system operator for the project. Currently, Spin provides bikeshare and scootershare service to the entirety of the*		Prior to issuance of a building permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		City of Davis and the UC Davis campus. Accordingly, the project site is presumed to be incorporated into the Spin service area. *Prior to issuance of an occupancy permit for the multi-family housing or USA Pentathlon Training Facility project components, whichever occurs first, the applicant shall construct a hub for use by the bikeshare and scootershare system operator within the multi-family housing or USA Pentathlon Training Facility.* *According to CAPCOA, this strategy would reduce project-generated residential VMT per capita by 0.06 percent.* 5) ***Community-based travel planning (CAPCOA Handbook Strategy T-23)*** *– This measure would target residences in the project area with community-based travel planning (CBTP). CBTP is a residential-based*		Prior to occupancy of the first phase of the project residential component	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household VMT. *Prior to occupancy of the first phase of the project residential component, the project applicant shall partner with a CBTP service provider such as Yolo Commute and ensure that CBTP services are available to project residents, and renewed on an annual basis. As of early 2024, Yolo Commute annual membership dues for a housing development of 175 units are $2,250 per year.* *According to CAPCOA, this strategy would have a maximum reduction potential of 2.3 percent of project VMT.*			
4.7 Other Effects					
4.7.2	Agriculture and Forestry Resources	*4.1-3* *The project applicant shall comply with City of Davis Municipal Code*	Davis City Council	Prior to recordation of the final map(s)	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		Chapter 40A.03 (Farmland Preservation Ordinance) and shall set aside in perpetuity active agricultural acreage consistent with the ordinance, through granting a farmland conservation easement, a farmland deed restriction, or other farmland conservation mechanism to or for the benefit of the City and/or a qualifying entity approved by the City. The mitigation acreage shall be set aside prior to recordation of the final map(s). The location and amount of active agricultural acreage for the proposed project would be subject to the review and approval of the City Council.			
		4.1-4(a) Consistent with Action AG 1.1(g) of the General Plan and the Davis Right-to-Farm Ordinance, the applicant/developer shall inform and provide recorded notice to prospective buyers within 1,000 feet of agricultural land in writing and prior to purchase, as prescribed by the City's Right to Farm Ordinance, about existing and on-going agricultural activities in the immediate area in the form of a deed restriction to be recorded on the parcels. The notifications shall disclose that Davis and Yolo County are agricultural	Davis Community Development and Sustainability Department	Prior to recording final maps	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		areas and residents of the property may be subject to inconvenience or discomfort arising from the use of agricultural chemicals, and from pursuit of agricultural operations, including, but not limited to cultivation, irrigation, plowing, spraying, aerial application, pruning, harvesting, crop protection, and agricultural burning which occasionally generate dust, smoke, noise, and odor. The language and format of the deed restriction shall be reviewed and approved by the Community Development Director prior to recording final maps. Each deed restriction shall be acknowledged with the signature of each prospective property owner.			
4.7.3	Cultural Resources	*V-1* *Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, an archaeological monitor shall be retained by the applicant and approved by the City to train the construction grading crew prior to commencement of earth-grading activity in regard to the types of artifacts, rock, bone, or shell that they are likely to find, and when work shall be stopped for further evaluation. One*	Davis Community Development and Sustainability Department Archeological Monitor	Prior to commencement of construction-related activities	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		trained crew member shall be on-site during all earth moving activities, with the assigned responsibility of "monitor." If any earth-moving activities uncover artifacts, exotic rock, or unusual amounts of bone or shell, work shall be halted in the immediate area of the find and shall not be resumed until after the archaeologist monitor has inspected and evaluated the deposit and determined the appropriate means of curation. The appropriate mitigation measures may include as little as recording the resource with the California Archaeological Inventory database or as much as excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance. The Yocha Dehe Wintun Nation ("Tribe") traditionally occupied lands in Yolo County and will be presumed to be the Most Likely Descendants (MLD) of any tribal cultural resource or remains discovered on-site unless otherwise determined by an archeologist or the County coroner. Prior to commencement of construction-related activities, the applicant shall enter into a training and monitoring agreement with the Tribe, which may also serve to fulfill the requirement for			

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		an archeological monitor subject to City approval. In the event that any Native American human remains, grave goods, ceremonial terms, or items of cultural patrimony, are found in conjunction with development, the applicant shall contact Tribal representatives and use the Tribe's Protocol for the treatment of such resources.			
		V-2 *Prior to the approval of tentative map(s), the tentative map(s) shall state that during construction, if bone is uncovered that may be human; the Native American Heritage Commission in Sacramento and the Yolo County Coroner shall be notified. Should human remains be found, the Coroner's office shall be immediately contacted and all work halted until final disposition by the Coroner. Should the remains be determined to be of Native American descent, the Native American Heritage Commission shall be consulted to determine the appropriate disposition of such remains.*	The Native American Heritage Commission Yolo County Coroner	Prior to the approval of tentative map(s)	
4.7.4	Geology and Soils	*VI-1* *Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, the developer*	City Engineer	Prior to commencement of construction-related activities	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project						
Impact Number	**Impact**	**Mitigation Measure**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			shall prepare a storm water pollution prevention plan (SWPPP), consistent with the State Water Resources Control Board NPDES requirements. A of the SWPPP shall be submitted to the City Engineer subject to review and comment.			
		VI-2	*Prior to the approval of final map(s), a final design-level geotechnical report, with consideration of recommendations from the Geotechnical Update, shall be prepared and submitted to the Chief Building Official for review and comment. The recommendations of the final geotechnical report shall be incorporated into the project design prior to issuance of building permits for review and approval of the City Engineer and/or Chief Building Official.*			
4.7.5	Hazards and Hazardous Materials	*VII-1*	*Prior to commencement of construction-related activities for the project including, but not limited to, grading, staging of materials, or earthmoving activities, the on-site septic systems and agricultural well(s) shall be located and properly destroyed by a licensed contractor in compliance with Yolo County Environmental Health Department standards. Confirmation of the*	City Engineer Yolo County Environmental Health Department	Prior to commencement of construction-related activities	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		destruction of such facilities shall be submitted to the City Engineer.			
		SEIR 4.7-1 *Prior to initiation of ground-disturbing activities, all on-site treated wood waste shall be removed and disposed of in compliance with Health and Safety Code Section 25230. Compliance with the forgoing standard includes, but is not limited to, clearly labeling all treated wood waste, accumulating treated wood waste in a manner that is protected from run-on and runoff and is placed on a surface sufficiently impervious to prevent contact with soil and water, and transferring treated wood waste to only a treated wood waste facility or a treated wood waste approved landfill. Proof of compliance shall be submitted for review and approval by the City Engineer.*	City Engineer	Prior to initiation of ground-disturbing activities	
4.7.6	Hydrology and Water Quality	*4.8-2* *In conjunction with the submittal of improvement plans, the project applicant shall submit a design-level engineering report on the stormwater detention and conveyance system to the City Engineer demonstrating that the proposed project peak flows into the existing 36-inch storm drain would not exceed 6.2 cfs. The report shall also demonstrate that peak flows from the site do not coincide with*	City Engineer	In conjunction with the submittal of improvement plans	

MITIGATION MONITORING AND REPORTING PROGRAM Palomino Place Project					
Impact Number	**Impact**	**Mitigation Measure**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		peak flows within Channel "A" and demonstrate how the system would function to adequately treat stormwater runoff prior to being discharged into Channel "A." Stormwater detention and conveyance plans shall be reviewed and approved by the City Engineer.			
		4.8-3 *Prior to commencement of construction, the applicant shall obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), which pertains to pollution from grading and project construction. Compliance with the Permit requires the project applicant to file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to ground disturbance. The SWPPP would incorporate Best Management Practices (BMPs) in order to prevent, or reduce to the greatest extent feasible, adverse impacts to water quality from erosion and sedimentation. A copy of the SWPP including BMP implementation provisions shall be submitted to the City Engineer.*	City Engineer	Prior to commencement of construction	

Appendix A

Palomino Place - Baseline Scenario Custom Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Palomino Place - Baseline Scenario
Construction Start Date	4/1/2026
Operational Year	2028
Lead Agency	City of Davis
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.60
Precipitation (days)	18.2
Location	38.566541022409304, -121.71451052514658
County	Yolo
City	Davis
Air District	Yolo/Solano AQMD
Air Basin	Sacramento Valley
TAZ	317
EDFZ	4
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.28

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	73.0	Dwelling Unit	6.71	142,350	75,528	—	202	—

Condo/Townhouse	78.0	Dwelling Unit	4.44	82,680	49,977	—	216	—
Apartments Mid Rise	40.0	Dwelling Unit	1.31	38,400	14,745	—	111	—
Parking Lot	157	Space	1.41	0.00	0.00	—	—	—
Other Asphalt Surfaces	2.21	Acre	2.21	0.00	0.00	—	—	—
City Park	9.71	Acre	9.71	0.00	399,445	399,445	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Energy	E-10-B	Establish Onsite Renewable Energy Systems: Solar Power

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.71	6.46	29.2	29.8	0.06	1.24	19.8	21.1	1.14	10.1	11.3	—	6,820	6,820	0.27	0.15	6.03	6,846
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.74	6.48	11.9	20.0	0.03	0.41	1.50	1.91	0.38	0.36	0.74	—	4,406	4,406	0.15	0.16	0.17	4,458
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.76	4.55	9.48	14.1	0.02	0.38	2.60	2.98	0.35	1.09	1.44	—	3,146	3,146	0.10	0.11	1.86	3,184
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	0.87	0.83	1.73	2.57	< 0.005	0.07	0.47	0.54	0.06	0.20	0.26	—	521	521	0.02	0.02	0.31	527

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.82	3.21	29.2	29.8	0.06	1.24	19.8	21.1	1.14	10.1	11.3	—	6,820	6,820	0.27	0.13	1.82	6,846
2027	6.71	6.46	11.2	21.4	0.03	0.36	1.50	1.86	0.34	0.36	0.69	—	4,529	4,529	0.14	0.15	6.03	4,584
2028	6.64	6.36	10.7	20.9	0.03	0.32	1.50	1.82	0.29	0.36	0.65	—	4,487	4,487	0.14	0.15	5.43	4,542
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	6.74	6.48	11.9	20.0	0.03	0.41	1.50	1.91	0.38	0.36	0.74	—	4,406	4,406	0.15	0.16	0.17	4,458
2027	6.67	6.37	11.4	19.6	0.03	0.36	1.50	1.86	0.34	0.36	0.69	—	4,372	4,372	0.15	0.16	0.16	4,423
2028	6.60	6.31	10.8	19.3	0.03	0.32	1.50	1.82	0.29	0.36	0.65	—	4,334	4,334	0.15	0.16	0.14	4,385
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.07	1.86	9.48	11.2	0.02	0.38	2.60	2.98	0.35	1.09	1.44	—	2,412	2,412	0.09	0.05	0.64	2,430
2027	4.76	4.55	8.07	14.1	0.02	0.26	1.06	1.32	0.24	0.25	0.49	—	3,146	3,146	0.10	0.11	1.86	3,184
2028	2.22	2.13	3.41	6.16	0.01	0.10	0.47	0.58	0.09	0.11	0.21	—	1,385	1,385	0.05	0.05	0.75	1,402
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.38	0.34	1.73	2.05	< 0.005	0.07	0.47	0.54	0.06	0.20	0.26	—	399	399	0.02	0.01	0.11	402
2027	0.87	0.83	1.47	2.57	< 0.005	0.05	0.19	0.24	0.04	0.05	0.09	—	521	521	0.02	0.02	0.31	527
2028	0.40	0.39	0.62	1.12	< 0.005	0.02	0.09	0.11	0.02	0.02	0.04	—	229	229	0.01	0.01	0.12	232

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.82	3.21	29.2	29.8	0.06	1.24	19.8	21.1	1.14	10.1	11.3	—	6,820	6,820	0.27	0.13	1.82	6,846
2027	6.71	6.46	11.2	21.4	0.03	0.36	1.50	1.86	0.34	0.36	0.69	—	4,529	4,529	0.14	0.15	6.03	4,584
2028	6.64	6.36	10.7	20.9	0.03	0.32	1.50	1.82	0.29	0.36	0.65	—	4,487	4,487	0.14	0.15	5.43	4,542
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	6.74	6.48	11.9	20.0	0.03	0.41	1.50	1.91	0.38	0.36	0.74	—	4,406	4,406	0.15	0.16	0.17	4,458
2027	6.67	6.37	11.4	19.6	0.03	0.36	1.50	1.86	0.34	0.36	0.69	—	4,372	4,372	0.15	0.16	0.16	4,423
2028	6.60	6.31	10.8	19.3	0.03	0.32	1.50	1.82	0.29	0.36	0.65	—	4,334	4,334	0.15	0.16	0.14	4,385
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.07	1.86	9.48	11.2	0.02	0.38	2.60	2.98	0.35	1.09	1.44	—	2,412	2,412	0.09	0.05	0.64	2,430
2027	4.76	4.55	8.07	14.1	0.02	0.26	1.06	1.32	0.24	0.25	0.49	—	3,146	3,146	0.10	0.11	1.86	3,184
2028	2.22	2.13	3.41	6.16	0.01	0.10	0.47	0.58	0.09	0.11	0.21	—	1,385	1,385	0.05	0.05	0.75	1,402
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.38	0.34	1.73	2.05	< 0.005	0.07	0.47	0.54	0.06	0.20	0.26	—	399	399	0.02	0.01	0.11	402
2027	0.87	0.83	1.47	2.57	< 0.005	0.05	0.19	0.24	0.04	0.05	0.09	—	521	521	0.02	0.02	0.31	527
2028	0.40	0.39	0.62	1.12	< 0.005	0.02	0.09	0.11	0.02	0.02	0.04	—	229	229	0.01	0.01	0.12	232

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.9	15.0	8.05	77.3	0.16	0.22	12.9	13.1	0.21	3.28	3.49	86.0	17,858	17,944	9.56	0.78	47.4	18,463
Mit.	15.9	15.0	8.05	77.3	0.16	0.22	12.9	13.1	0.21	3.28	3.49	86.0	17,510	17,596	9.51	0.77	47.4	18,111

% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	2%	2%	1%	1%	—	2%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14.2	13.4	9.10	57.8	0.15	0.21	12.9	13.1	0.20	3.28	3.49	86.0	16,622	16,708	9.64	0.84	3.07	17,203
Mit.	14.2	13.4	9.10	57.8	0.15	0.21	12.9	13.1	0.20	3.28	3.49	86.0	16,274	16,360	9.58	0.83	3.07	16,851
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	2%	2%	1%	1%	—	2%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14.7	13.9	8.65	62.1	0.15	0.21	12.7	13.0	0.21	3.24	3.45	86.0	16,889	16,975	9.59	0.81	21.5	17,478
Mit.	14.7	13.9	8.65	62.1	0.15	0.21	12.7	13.0	0.21	3.24	3.45	86.0	16,541	16,627	9.54	0.80	21.5	17,127
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	2%	2%	1%	1%	—	2%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.68	2.53	1.58	11.3	0.03	0.04	2.33	2.37	0.04	0.59	0.63	14.2	2,796	2,810	1.59	0.13	3.57	2,894
Mit.	2.68	2.53	1.58	11.3	0.03	0.04	2.33	2.37	0.04	0.59	0.63	14.2	2,739	2,753	1.58	0.13	3.57	2,836
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	2%	2%	1%	1%	—	2%

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.28	7.56	6.81	66.0	0.15	0.12	12.9	13.0	0.11	3.28	3.39	—	15,663	15,663	0.69	0.73	45.5	15,944
Area	7.45	7.40	0.10	10.9	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.1
Energy	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	2,142	2,142	0.24	0.02	—	2,153

Water	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Waste	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Total	15.9	15.0	8.05	77.3	0.16	0.22	12.9	13.1	0.21	3.28	3.49	86.0	17,858	17,944	9.56	0.78	47.4	18,463
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.65	6.90	7.97	57.3	0.14	0.12	12.9	13.0	0.11	3.28	3.39	—	14,457	14,457	0.77	0.79	1.18	14,713
Area	6.45	6.45	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	2,142	2,142	0.24	0.02	—	2,153
Water	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Waste	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Total	14.2	13.4	9.10	57.8	0.15	0.21	12.9	13.1	0.20	3.28	3.49	86.0	16,622	16,708	9.64	0.84	3.07	17,203
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.62	6.89	7.46	56.3	0.14	0.12	12.7	12.9	0.11	3.24	3.36	—	14,709	14,709	0.72	0.76	19.7	14,974
Area	6.95	6.92	0.05	5.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	14.3	14.3	< 0.005	< 0.005	—	14.3
Energy	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	2,142	2,142	0.24	0.02	—	2,153
Water	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Waste	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Total	14.7	13.9	8.65	62.1	0.15	0.21	12.7	13.0	0.21	3.24	3.45	86.0	16,889	16,975	9.59	0.81	21.5	17,478
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.39	1.26	1.36	10.3	0.03	0.02	2.33	2.35	0.02	0.59	0.61	—	2,435	2,435	0.12	0.13	3.25	2,479
Area	1.27	1.26	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.37
Energy	0.02	0.01	0.21	0.09	< 0.005	0.02	—	0.02	0.02	—	0.02	—	355	355	0.04	< 0.005	—	356
Water	—	—	—	—	—	—	—	—	—	—	—	2.11	3.99	6.10	0.22	0.01	—	13.1
Waste	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.4

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31
Total	2.68	2.53	1.58	11.3	0.03	0.04	2.33	2.37	0.04	0.59	0.63	14.2	2,796	2,810	1.59	0.13	3.57	2,894

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.28	7.56	6.81	66.0	0.15	0.12	12.9	13.0	0.11	3.28	3.39	—	15,663	15,663	0.69	0.73	45.5	15,944
Area	7.45	7.40	0.10	10.9	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.1
Energy	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	1,794	1,794	0.18	0.01	—	1,801
Water	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Waste	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Total	15.9	15.0	8.05	77.3	0.16	0.22	12.9	13.1	0.21	3.28	3.49	86.0	17,510	17,596	9.51	0.77	47.4	18,111
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.65	6.90	7.97	57.3	0.14	0.12	12.9	13.0	0.11	3.28	3.39	—	14,457	14,457	0.77	0.79	1.18	14,713
Area	6.45	6.45	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	1,794	1,794	0.18	0.01	—	1,801
Water	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Waste	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Total	14.2	13.4	9.10	57.8	0.15	0.21	12.9	13.1	0.20	3.28	3.49	86.0	16,274	16,360	9.58	0.83	3.07	16,851
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.62	6.89	7.46	56.3	0.14	0.12	12.7	12.9	0.11	3.24	3.36	—	14,709	14,709	0.72	0.76	19.7	14,974
Area	6.95	6.92	0.05	5.35	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	14.3	14.3	< 0.005	< 0.005	—	14.3

Energy	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	1,794	1,794	0.18	0.01	—	1,801
Water	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Waste	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Total	14.7	13.9	8.65	62.1	0.15	0.21	12.7	13.0	0.21	3.24	3.45	86.0	16,541	16,627	9.54	0.80	21.5	17,127
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.39	1.26	1.36	10.3	0.03	0.02	2.33	2.35	0.02	0.59	0.61	—	2,435	2,435	0.12	0.13	3.25	2,479
Area	1.27	1.26	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.37
Energy	0.02	0.01	0.21	0.09	< 0.005	0.02	—	0.02	0.02	—	0.02	—	297	297	0.03	< 0.005	—	298
Water	—	—	—	—	—	—	—	—	—	—	—	2.11	3.99	6.10	0.22	0.01	—	13.1
Waste	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.4
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31
Total	2.68	2.53	1.58	11.3	0.03	0.04	2.33	2.37	0.04	0.59	0.63	14.2	2,739	2,753	1.58	0.13	3.57	2,836

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.74	0.74	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	0.19	1.70	1.56	< 0.005	0.07	—	0.07	0.06	—	0.06	—	282	282	0.01	< 0.005	—	283
Demolition	—	—	—	—	—	—	0.06	0.06	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.31	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46.6	46.6	< 0.005	< 0.005	—	46.8
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.84	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	166	166	< 0.005	0.01	0.59	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	0.01	0.71	0.25	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	581	581	0.03	0.09	1.22	611
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.5	12.5	< 0.005	< 0.005	0.02	12.7

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	47.8	47.8	< 0.005	0.01	0.04	50.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.07	2.07	< 0.005	< 0.005	< 0.005	2.10
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.91	7.91	< 0.005	< 0.005	0.01	8.31

3.2. Demolition (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.74	0.74	—	0.11	0.11	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	0.19	1.70	1.56	< 0.005	0.07	—	0.07	0.06	—	0.06	—	282	282	0.01	< 0.005	—	283
Demolition	—	—	—	—	—	—	0.06	0.06	—	0.01	0.01	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.31	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	46.6	46.6	< 0.005	< 0.005	—	46.8
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.84	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	166	166	< 0.005	0.01	0.59	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	0.01	0.71	0.25	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	581	581	0.03	0.09	1.22	611
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.5	12.5	< 0.005	< 0.005	0.02	12.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	47.8	47.8	< 0.005	0.01	0.04	50.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.07	2.07	< 0.005	< 0.005	< 0.005	2.10
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.91	7.91	< 0.005	< 0.005	0.01	8.31

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.17	1.60	1.58	< 0.005	0.07	—	0.07	0.06	—	0.06	—	290	290	0.01	< 0.005	—	291
Dust From Material Movement	—	—	—	—	—	—	1.08	1.08	—	0.55	0.55	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.1	48.1	< 0.005	< 0.005	—	48.2

Dust From Material Movement	—	—	—	—	—	—	0.20	0.20	—	0.10	0.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.04	0.98	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	194	194	< 0.005	0.01	0.69	197
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.72	9.72	< 0.005	< 0.005	0.02	9.86
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Site Preparation (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.17	1.60	1.58	< 0.005	0.07	—	0.07	0.06	—	0.06	—	290	290	0.01	< 0.005	—	291
Dust From Material Movement	—	—	—	—	—	—	1.08	1.08	—	0.55	0.55	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.1	48.1	< 0.005	< 0.005	—	48.2
Dust From Material Movement	—	—	—	—	—	—	0.20	0.20	—	0.10	0.10	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.04	0.98	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	194	194	< 0.005	0.01	0.69	197
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.72	9.72	< 0.005	< 0.005	0.02	9.86
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.45	0.38	3.36	3.40	0.01	0.14	—	0.14	0.13	—	0.13	—	814	814	0.03	0.01	—	816
Dust From Material Movement	—	—	—	—	—	—	1.13	1.13	—	0.45	0.45	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.61	0.62	< 0.005	0.03	—	0.03	0.02	—	0.02	—	135	135	0.01	< 0.005	—	135
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.05	1.12	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	222	222	< 0.005	0.01	0.79	225
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	25.0	25.0	< 0.005	< 0.005	0.04	25.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.14	4.14	< 0.005	< 0.005	0.01	4.20
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Grading (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621

Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.45	0.38	3.36	3.40	0.01	0.14	—	0.14	0.13	—	0.13	—	814	814	0.03	0.01	—	816
Dust From Material Movement	—	—	—	—	—	—	1.13	1.13	—	0.45	0.45	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.61	0.62	< 0.005	0.03	—	0.03	0.02	—	0.02	—	135	135	0.01	< 0.005	—	135
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.05	1.12	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	222	222	< 0.005	0.01	0.79	225

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	25.0	25.0	< 0.005	< 0.005	0.04	25.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.14	4.14	< 0.005	< 0.005	0.01	4.20
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	0.19	1.74	2.28	< 0.005	0.07	—	0.07	0.06	—	0.06	—	422	422	0.02	< 0.005	—	424
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.32	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	69.9	69.9	< 0.005	< 0.005	—	70.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.42	0.40	0.41	4.67	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,100	1,100	0.02	0.04	0.11	1,114
Vendor	0.04	0.02	0.73	0.26	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	555	555	0.02	0.09	0.04	581
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.84	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	199	199	< 0.005	0.01	0.33	201
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	97.7	97.7	< 0.005	0.02	0.11	102
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	32.9	32.9	< 0.005	< 0.005	0.06	33.4
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	16.2	16.2	< 0.005	< 0.005	0.02	17.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	0.19	1.74	2.28	< 0.005	0.07	—	0.07	0.06	—	0.06	—	422	422	0.02	< 0.005	—	424
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.32	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	69.9	69.9	< 0.005	< 0.005	—	70.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.42	0.40	0.41	4.67	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,100	1,100	0.02	0.04	0.11	1,114
Vendor	0.04	0.02	0.73	0.26	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	555	555	0.02	0.09	0.04	581
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.84	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	199	199	< 0.005	0.01	0.33	201
Vendor	0.01	< 0.005	0.13	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	97.7	97.7	< 0.005	0.02	0.11	102
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.04	0.04	0.00	0.01	0.01	—	32.9	32.9	< 0.005	< 0.005	0.06	33.4
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	—	16.2	16.2	< 0.005	< 0.005	0.02	17.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.88	0.74	6.71	9.24	0.02	0.24	—	0.24	0.22	—	0.22	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.16	0.13	1.22	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.44	0.43	0.28	5.87	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,212	1,212	0.02	0.04	4.00	1,229
Vendor	0.03	0.02	0.65	0.24	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	544	544	0.02	0.08	1.23	570
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.40	0.35	0.37	4.42	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,081	1,081	0.02	0.04	0.10	1,095
Vendor	0.03	0.02	0.70	0.25	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	544	544	0.02	0.08	0.03	569
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.28	0.25	0.23	3.20	0.00	0.00	0.79	0.79	0.00	0.19	0.19	—	792	792	0.01	0.03	1.23	803
Vendor	0.02	0.01	0.49	0.18	< 0.005	0.01	0.11	0.11	0.01	0.03	0.04	—	388	388	0.01	0.06	0.38	407
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.58	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	131	131	< 0.005	0.01	0.20	133
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	64.3	64.3	< 0.005	0.01	0.06	67.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.88	0.74	6.71	9.24	0.02	0.24	—	0.24	0.22	—	0.22	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.22	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.44	0.43	0.28	5.87	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,212	1,212	0.02	0.04	4.00	1,229
Vendor	0.03	0.02	0.65	0.24	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	544	544	0.02	0.08	1.23	570
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.40	0.35	0.37	4.42	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,081	1,081	0.02	0.04	0.10	1,095
Vendor	0.03	0.02	0.70	0.25	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	—	544	544	0.02	0.08	0.03	569
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.28	0.25	0.23	3.20	0.00	0.00	0.79	0.79	0.00	0.19	0.19	—	792	792	0.01	0.03	1.23	803
Vendor	0.02	0.01	0.49	0.18	< 0.005	0.01	0.11	0.11	0.01	0.03	0.04	—	388	388	0.01	0.06	0.38	407
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.58	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	131	131	< 0.005	0.01	0.20	133
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	64.3	64.3	< 0.005	0.01	0.06	67.3

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.37	0.31	2.81	4.08	0.01	0.09	—	0.09	0.09	—	0.09	—	755	755	0.03	0.01	—	758
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.07	0.06	0.51	0.74	< 0.005	0.02	—	0.02	0.02	—	0.02	—	125	125	0.01	< 0.005	—	125
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.42	0.38	0.24	5.55	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,188	1,188	0.02	0.04	3.62	1,204
Vendor	0.03	0.02	0.63	0.24	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	531	531	0.02	0.08	1.09	557
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.39	0.34	0.33	4.17	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,060	1,060	0.02	0.04	0.09	1,074
Vendor	0.03	0.02	0.68	0.24	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	532	532	0.02	0.08	0.03	556
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.11	0.09	1.34	0.00	0.00	0.35	0.35	0.00	0.08	0.08	—	342	342	0.01	0.01	0.49	347
Vendor	0.01	0.01	0.21	0.07	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	167	167	0.01	0.03	0.15	175
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.24	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	56.7	56.7	< 0.005	< 0.005	0.08	57.5
Vendor	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.7	27.7	< 0.005	< 0.005	0.02	29.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Building Construction (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.37	0.31	2.81	4.08	0.01	0.09	—	0.09	0.09	—	0.09	—	755	755	0.03	0.01	—	758
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.51	0.74	< 0.005	0.02	—	0.02	0.02	—	0.02	—	125	125	0.01	< 0.005	—	125
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.42	0.38	0.24	5.55	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,188	1,188	0.02	0.04	3.62	1,204
Vendor	0.03	0.02	0.63	0.24	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	531	531	0.02	0.08	1.09	557
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.39	0.34	0.33	4.17	0.00	0.00	1.12	1.12	0.00	0.26	0.26	—	1,060	1,060	0.02	0.04	0.09	1,074
Vendor	0.03	0.02	0.68	0.24	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05	—	532	532	0.02	0.08	0.03	556
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.11	0.09	1.34	0.00	0.00	0.35	0.35	0.00	0.08	0.08	—	342	342	0.01	0.01	0.49	347
Vendor	0.01	0.01	0.21	0.07	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	167	167	0.01	0.03	0.15	175
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.24	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	56.7	56.7	< 0.005	< 0.005	0.08	57.5
Vendor	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	27.7	27.7	< 0.005	< 0.005	0.02	29.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Paving (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.68	0.95	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	145
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.84	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	166	166	< 0.005	0.01	0.59	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.63	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	148	148	< 0.005	0.01	0.02	150
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	14.6	14.6	< 0.005	< 0.005	0.02	14.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.41	2.41	< 0.005	< 0.005	< 0.005	2.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Paving (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.68	0.95	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	145
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.84	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	166	166	< 0.005	0.01	0.59	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.63	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	148	148	< 0.005	0.01	0.02	150
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	14.6	14.6	< 0.005	< 0.005	0.02	14.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.41	2.41	< 0.005	< 0.005	< 0.005	2.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.13	0.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19.9	19.9	< 0.005	< 0.005	—	19.9
Architectural Coatings	0.71	0.71	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.29	3.29	< 0.005	< 0.005	—	3.30
Architectural Coatings	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.08	0.93	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	220	220	< 0.005	0.01	0.02	223
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	33.6	33.6	< 0.005	< 0.005	0.06	34.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.55	5.55	< 0.005	< 0.005	0.01	5.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.16. Architectural Coating (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.13	0.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19.9	19.9	< 0.005	< 0.005	—	19.9
Architectural Coatings	0.71	0.71	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.29	3.29	< 0.005	< 0.005	—	3.30
Architectural Coatings	0.13	0.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.08	0.93	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	220	220	< 0.005	0.01	0.02	223
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	33.6	33.6	< 0.005	< 0.005	0.06	34.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.55	5.55	< 0.005	< 0.005	0.01	5.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.59	0.80	< 0.005	0.01	—	0.01	0.01	—	0.01	—	95.4	95.4	< 0.005	< 0.005	—	95.7
Architectural Coatings	3.42	3.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.11	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.8	15.8	< 0.005	< 0.005	—	15.8
Architectural Coatings	0.62	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.06	1.17	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	242	242	< 0.005	0.01	0.80	246
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.88	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	216	216	< 0.005	0.01	0.02	219
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.64	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	158	158	< 0.005	0.01	0.25	161
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.12	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26.2	26.2	< 0.005	< 0.005	0.04	26.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.18. Architectural Coating (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.59	0.80	< 0.005	0.01	—	0.01	0.01	—	0.01	—	95.4	95.4	< 0.005	< 0.005	—	95.7
Architectural Coatings	3.42	3.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.11	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.8	15.8	< 0.005	< 0.005	—	15.8

Architect Coatings	0.62	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.06	1.17	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	242	242	< 0.005	0.01	0.80	246
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.88	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	216	216	< 0.005	0.01	0.02	219
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.64	0.00	0.00	0.16	0.16	0.00	0.04	0.04	—	158	158	< 0.005	0.01	0.25	161
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.12	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26.2	26.2	< 0.005	< 0.005	0.04	26.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.19. Architectural Coating (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.28	0.38	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	45.7	45.7	< 0.005	< 0.005	—	45.9
Architectural Coatings	1.64	1.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.57	7.57	< 0.005	< 0.005	—	7.60
Architectural Coatings	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.05	1.11	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	238	238	< 0.005	0.01	0.72	241
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.83	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	212	212	< 0.005	0.01	0.02	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.02	0.29	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	74.4	74.4	< 0.005	< 0.005	0.11	75.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.3	12.3	< 0.005	< 0.005	0.02	12.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.20. Architectural Coating (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	4.78	4.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.28	0.38	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	45.7	45.7	< 0.005	< 0.005	—	45.9

Architect Coatings	1.64	1.64	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.57	7.57	< 0.005	< 0.005	—	7.60
Architectural Coatings	0.30	0.30	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.05	1.11	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	238	238	< 0.005	0.01	0.72	241
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.07	0.83	0.00	0.00	0.22	0.22	0.00	0.05	0.05	—	212	212	< 0.005	0.01	0.02	215
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.02	0.29	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	74.4	74.4	< 0.005	< 0.005	0.11	75.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	12.3	12.3	< 0.005	< 0.005	0.02	12.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.28	7.56	6.81	66.0	0.15	0.12	12.9	13.0	0.11	3.28	3.39	—	15,663	15,663	0.69	0.73	45.5	15,944
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	8.28	7.56	6.81	66.0	0.15	0.12	12.9	13.0	0.11	3.28	3.39	—	15,663	15,663	0.69	0.73	45.5	15,944

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	7.65	6.90	7.97	57.3	0.14	0.12	12.9	13.0	0.11	3.28	3.39	—	14,457	14,457	0.77	0.79	1.18	14,713
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	7.65	6.90	7.97	57.3	0.14	0.12	12.9	13.0	0.11	3.28	3.39	—	14,457	14,457	0.77	0.79	1.18	14,713
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.39	1.26	1.36	10.3	0.03	0.02	2.33	2.35	0.02	0.59	0.61	—	2,435	2,435	0.12	0.13	3.25	2,479
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Total	1.39	1.26	1.36	10.3	0.03	0.02	2.33	2.35	0.02	0.59	0.61	—	2,435	2,435	0.12	0.13	3.25	2,479

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	8.28	7.56	6.81	66.0	0.15	0.12	12.9	13.0	0.11	3.28	3.39	—	15,663	15,663	0.69	0.73	45.5	15,944
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	8.28	7.56	6.81	66.0	0.15	0.12	12.9	13.0	0.11	3.28	3.39	—	15,663	15,663	0.69	0.73	45.5	15,944
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	7.65	6.90	7.97	57.3	0.14	0.12	12.9	13.0	0.11	3.28	3.39	—	14,457	14,457	0.77	0.79	1.18	14,713
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Apartme Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	7.65	6.90	7.97	57.3	0.14	0.12	12.9	13.0	0.11	3.28	3.39	—	14,457	14,457	0.77	0.79	1.18	14,713
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1.39	1.26	1.36	10.3	0.03	0.02	2.33	2.35	0.02	0.59	0.61	—	2,435	2,435	0.12	0.13	3.25	2,479
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.39	1.26	1.36	10.3	0.03	0.02	2.33	2.35	0.02	0.59	0.61	—	2,435	2,435	0.12	0.13	3.25	2,479

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	348	348	0.06	0.01	—	351
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	227
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	101	101	0.02	< 0.005	—	102
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.1	30.1	< 0.005	< 0.005	—	30.4
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	704	704	0.11	0.01	—	711
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	348	348	0.06	0.01	—	351
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	227
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	101	101	0.02	< 0.005	—	102
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.1	30.1	< 0.005	< 0.005	—	30.4

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	704	704	0.11	0.01	—	711
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	57.6	57.6	0.01	< 0.005	—	58.2
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	37.2	37.2	0.01	< 0.005	—	37.6
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	16.7	16.7	< 0.005	< 0.005	—	16.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.98	4.98	< 0.005	< 0.005	—	5.03
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	117	117	0.02	< 0.005	—	118

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Condo/T	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	227
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	101	101	0.02	< 0.005	—	102
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.1	30.1	< 0.005	< 0.005	—	30.4
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	356	356	0.06	0.01	—	359
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	225	225	0.04	< 0.005	—	227
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	101	101	0.02	< 0.005	—	102
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	30.1	30.1	< 0.005	< 0.005	—	30.4
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	356	356	0.06	0.01	—	359
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Condo/T	—	—	—	—	—	—	—	—	—	—	—	—	37.2	37.2	0.01	< 0.005	—	37.6
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	16.7	16.7	< 0.005	< 0.005	—	16.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.98	4.98	< 0.005	< 0.005	—	5.03
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	58.9	58.9	0.01	< 0.005	—	59.5

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.06	0.03	0.54	0.23	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	682
Condo/Townhouse	0.05	0.03	0.46	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	580	580	0.05	< 0.005	—	582
Apartments Mid Rise	0.02	0.01	0.14	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	177	177	0.02	< 0.005	—	177
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	1,438	1,438	0.13	< 0.005	—	1,442
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.06	0.03	0.54	0.23	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	682
Condo/Townhouse	0.05	0.03	0.46	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	580	580	0.05	< 0.005	—	582
Apartments Mid Rise	0.02	0.01	0.14	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	177	177	0.02	< 0.005	—	177
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	1,438	1,438	0.13	< 0.005	—	1,442
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	113
Condo/Townhouse	0.01	< 0.005	0.08	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	96.1	96.1	0.01	< 0.005	—	96.4
Apartments Mid Rise	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	29.3	29.3	< 0.005	< 0.005	—	29.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.09	< 0.005	0.02	—	0.02	0.02	—	0.02	—	238	238	0.02	< 0.005	—	239

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.06	0.03	0.54	0.23	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	682
Condo/Townhouse	0.05	0.03	0.46	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	580	580	0.05	< 0.005	—	582
Apartments Mid Rise	0.02	0.01	0.14	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	177	177	0.02	< 0.005	—	177
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	1,438	1,438	0.13	< 0.005	—	1,442
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	0.06	0.03	0.54	0.23	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	682
Condo/Townhouse	0.05	0.03	0.46	0.19	< 0.005	0.04	—	0.04	0.04	—	0.04	—	580	580	0.05	< 0.005	—	582
Apartments Mid Rise	0.02	0.01	0.14	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	177	177	0.02	< 0.005	—	177
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.07	1.13	0.48	0.01	0.09	—	0.09	0.09	—	0.09	—	1,438	1,438	0.13	< 0.005	—	1,442
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	113
Condo/Townhouse	0.01	< 0.005	0.08	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	96.1	96.1	0.01	< 0.005	—	96.4
Apartments Mid Rise	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	29.3	29.3	< 0.005	< 0.005	—	29.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.09	< 0.005	0.02	—	0.02	0.02	—	0.02	—	238	238	0.02	< 0.005	—	239

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	5.88	5.88	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.00	0.94	0.10	10.9	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	29.0	29.0	< 0.005	< 0.005	—	29.1
Total	7.45	7.40	0.10	10.9	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	5.88	5.88	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.45	6.45	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	1.07	1.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.09	0.08	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.37	2.37	< 0.005	< 0.005	—	2.37
Total	1.27	1.26	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.37

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	5.88	5.88	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.00	0.94	0.10	10.9	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	29.0	29.0	< 0.005	< 0.005	—	29.1
Total	7.45	7.40	0.10	10.9	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.1

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	5.88	5.88	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.45	6.45	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	1.07	1.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.09	0.08	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.37	2.37	< 0.005	< 0.005	—	2.37
Total	1.27	1.26	0.01	0.98	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.37

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	4.88	5.54	10.4	0.50	0.01	—	26.5
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	5.21	5.48	10.7	0.54	0.01	—	27.9
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.67	2.65	5.33	0.27	0.01	—	14.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	10.4	10.4	< 0.005	< 0.005	—	10.5
Total	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	4.88	5.54	10.4	0.50	0.01	—	26.5
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	5.21	5.48	10.7	0.54	0.01	—	27.9
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.67	2.65	5.33	0.27	0.01	—	14.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	10.4	10.4	< 0.005	< 0.005	—	10.5
Total	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.81	0.92	1.72	0.08	< 0.005	—	4.39
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.86	0.91	1.77	0.09	< 0.005	—	4.62
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	0.44	0.44	0.88	0.05	< 0.005	—	2.34
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	1.72	1.72	< 0.005	< 0.005	—	1.74
Total	—	—	—	—	—	—	—	—	—	—	—	2.11	3.99	6.10	0.22	0.01	—	13.1

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	4.88	5.54	10.4	0.50	0.01	—	26.5
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	5.21	5.48	10.7	0.54	0.01	—	27.9

Apartme Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.67	2.65	5.33	0.27	0.01	—	14.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	10.4	10.4	< 0.005	< 0.005	—	10.5
Total	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	4.88	5.54	10.4	0.50	0.01	—	26.5
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	5.21	5.48	10.7	0.54	0.01	—	27.9
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.67	2.65	5.33	0.27	0.01	—	14.1
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	10.4	10.4	< 0.005	< 0.005	—	10.5
Total	—	—	—	—	—	—	—	—	—	—	—	12.8	24.1	36.8	1.31	0.03	—	79.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.81	0.92	1.72	0.08	< 0.005	—	4.39

Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.86	0.91	1.77	0.09	< 0.005	—	4.62
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	0.44	0.44	0.88	0.05	< 0.005	—	2.34
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	1.72	1.72	< 0.005	< 0.005	—	1.74
Total	—	—	—	—	—	—	—	—	—	—	—	2.11	3.99	6.10	0.22	0.01	—	13.1

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	25.7	0.00	25.7	2.57	0.00	—	90.1
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	31.1	0.00	31.1	3.11	0.00	—	109
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	16.0	0.00	16.0	1.60	0.00	—	55.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.45	0.00	0.45	0.04	0.00	—	1.57
Total	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	25.7	0.00	25.7	2.57	0.00	—	90.1
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	31.1	0.00	31.1	3.11	0.00	—	109
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	16.0	0.00	16.0	1.60	0.00	—	55.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.45	0.00	0.45	0.04	0.00	—	1.57
Total	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	4.26	0.00	4.26	0.43	0.00	—	14.9
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	5.15	0.00	5.15	0.51	0.00	—	18.0
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.64	0.00	2.64	0.26	0.00	—	9.25

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.07	0.00	0.07	0.01	0.00	—	0.26
Total	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.4

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	25.7	0.00	25.7	2.57	0.00	—	90.1
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	31.1	0.00	31.1	3.11	0.00	—	109
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	16.0	0.00	16.0	1.60	0.00	—	55.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.45	0.00	0.45	0.04	0.00	—	1.57
Total	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	25.7	0.00	25.7	2.57	0.00	—	90.1
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	31.1	0.00	31.1	3.11	0.00	—	109
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	16.0	0.00	16.0	1.60	0.00	—	55.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.45	0.00	0.45	0.04	0.00	—	1.57
Total	—	—	—	—	—	—	—	—	—	—	—	73.2	0.00	73.2	7.32	0.00	—	256
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	4.26	0.00	4.26	0.43	0.00	—	14.9
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	5.15	0.00	5.15	0.51	0.00	—	18.0
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.64	0.00	2.64	0.26	0.00	—	9.25
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.07	0.00	0.07	0.01	0.00	—	0.26

Total	—	—	—	—	—	—	—	—	—	—	—	12.1	0.00	12.1	1.21	0.00	—	42.4

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.02	1.02
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.59	0.59
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.02	1.02
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.59	0.59
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28

City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.17	0.17
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.10	0.10
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.02	1.02
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.59	0.59
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.02	1.02
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.59	0.59
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.89	1.89
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.17	0.17
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.10	0.10
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipm Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	4/1/2026	5/13/2026	5.00	30.0	—
Site Preparation	Site Preparation	5/14/2026	6/11/2026	5.00	20.0	—
Grading	Grading	6/12/2026	8/14/2026	5.00	45.0	—
Building Construction	Building Construction	10/3/2026	6/9/2028	5.00	440	—
Paving	Paving	8/15/2026	10/2/2026	5.00	35.0	—
Architectural Coating	Architectural Coating	10/17/2026	6/23/2028	5.00	440	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40

Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	14.3	LDA,LDT1,LDT2
Demolition	Vendor	—	8.80	HHDT,MHDT
Demolition	Hauling	8.33	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT

Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	14.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.80	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	14.3	LDA,LDT1,LDT2
Grading	Vendor	—	8.80	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	111	14.3	LDA,LDT1,LDT2
Building Construction	Vendor	20.4	8.80	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	14.3	LDA,LDT1,LDT2
Paving	Vendor	—	8.80	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	22.2	14.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.80	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix

Demolition	—	—	—	—
Demolition	Worker	15.0	14.3	LDA,LDT1,LDT2
Demolition	Vendor	—	8.80	HHDT,MHDT
Demolition	Hauling	8.33	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	14.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.80	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	14.3	LDA,LDT1,LDT2
Grading	Vendor	—	8.80	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	111	14.3	LDA,LDT1,LDT2
Building Construction	Vendor	20.4	8.80	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	14.3	LDA,LDT1,LDT2
Paving	Vendor	—	8.80	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	22.2	14.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.80	HHDT,MHDT

Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	533,446	177,815	0.00	0.00	9,461

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	21,700	—
Site Preparation	—	—	30.0	0.00	—
Grading	—	—	135	0.00	—
Paving	0.00	0.00	0.00	0.00	4.42

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	0.80	0%
Condo/Townhouse	—	0%

Apartments Mid Rise	—	0%
Parking Lot	1.41	100%
Other Asphalt Surfaces	2.21	100%
City Park	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	1,801	1,801	1,801	657,365	18,090	18,090	18,090	6,602,949
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year

Single Family Housing	1,801	1,801	1,801	657,365	18,090	18,090	18,090	6,602,949
Condo/Townhouse	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	73
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Condo/Townhouse	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0

Electric Fireplaces	0
No Fireplaces	78
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	40
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	73
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0

Pellet Wood Stoves	0
Condo/Townhouse	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	78
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	40
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
533445.75	177,815	0.00	0.00	9,461

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	622,377	204	0.0330	0.0040	2,123,572
Condo/Townhouse	402,415	204	0.0330	0.0040	1,811,156
Apartments Mid Rise	180,712	204	0.0330	0.0040	551,700
Parking Lot	53,804	204	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00
City Park	0.00	204	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	0.00	204	0.0330	0.0040	2,123,572
Condo/Townhouse	402,415	204	0.0330	0.0040	1,811,156
Apartments Mid Rise	180,712	204	0.0330	0.0040	551,700
Parking Lot	53,804	204	0.0330	0.0040	0.00

Other Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00
City Park	0.00	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	2,546,329	1,201,310
Condo/Townhouse	2,720,736	794,909
Apartments Mid Rise	1,395,249	234,527
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00
City Park	0.00	11,551,582

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	2,546,329	1,201,310
Condo/Townhouse	2,720,736	794,909
Apartments Mid Rise	1,395,249	234,527
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00
City Park	0.00	11,551,582

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	47.8	—

Condo/Townhouse	57.7	—
Apartments Mid Rise	29.6	—
Parking Lot	0.00	—
Other Asphalt Surfaces	0.00	—
City Park	0.84	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	47.8	—
Condo/Townhouse	57.7	—
Apartments Mid Rise	29.6	—
Parking Lot	0.00	—
Other Asphalt Surfaces	0.00	—
City Park	0.84	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

8. User Changes to Default Data

Screen	Justification
Land Use	Land use adjustments made based on project-specific information from the Wildhorse Project EIR.
Construction: Construction Phases	Based on typical construction practices, architectural coating assumed to start two weeks after the start of building construction and last for the same number of days.

Construction: On-Road Fugitive Dust	All roads in the project vicinity are paved.
Operations: Vehicle Data	Trip generation rates and VMT adjusted consistent with project-specific data provided by Fehr & Peers.
Operations: Road Dust	All roads in the project area are paved.

Palomino Place - Proposed Project Custom Report

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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Palomino Place - Proposed Project
Construction Start Date	4/1/2026
Operational Year	2029
Lead Agency	City of Davis
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.60
Precipitation (days)	18.2
Location	38.566541022409304, -121.71451052514658
County	Yolo
City	Davis
Air District	Yolo/Solano AQMD
Air Basin	Sacramento Valley
TAZ	317
EDFZ	4
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.28

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	101	Dwelling Unit	12.0	196,950	103,569	—	280	—

Apartments Mid Rise	45.0	Dwelling Unit	0.59	43,200	5,178	—	125	—
Condo/Townhouse High Rise	29.0	Dwelling Unit	2.53	27,840	21,836	—	80.0	—
Health Club	14.0	1000sqft	1.07	14,000	9,666	—	—	—
Recreational Swimming Pool	3.38	1000sqft	0.08	3,375	0.00	—	—	—
Parking Lot	88.0	Space	0.55	0.00	0.00	—	—	—
Other Asphalt Surfaces	5.74	Acre	5.74	0.00	0.00	—	—	—
City Park	3.22	Acre	3.22	0.00	140,263	140,263	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Energy	E-10-A	Establish Onsite Renewable Energy Systems: Generic
Energy	E-10-B	Establish Onsite Renewable Energy Systems: Solar Power

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.99	4.74	34.5	31.7	0.10	1.33	21.0	22.3	1.20	10.5	11.7	—	12,384	12,384	0.55	0.96	12.5	12,697
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.95	4.66	34.6	30.8	0.10	1.23	10.9	12.1	1.10	4.11	5.22	—	12,362	12,362	0.55	0.96	0.32	12,663

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.50	3.30	15.1	13.9	0.04	0.56	4.24	4.80	0.51	1.72	2.23	—	4,638	4,638	0.20	0.32	1.82	4,740
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.64	0.60	2.76	2.54	0.01	0.10	0.77	0.88	0.09	0.31	0.41	—	768	768	0.03	0.05	0.30	785

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.14	3.31	34.5	31.7	0.10	1.33	21.0	22.3	1.20	10.5	11.7	—	12,384	12,384	0.55	0.96	12.5	12,697
2027	4.99	4.74	11.2	20.5	0.03	0.36	1.33	1.70	0.34	0.32	0.65	—	4,372	4,372	0.14	0.15	5.48	4,426
2028	4.92	4.64	10.7	20.1	0.03	0.32	1.33	1.66	0.29	0.32	0.61	—	4,334	4,334	0.14	0.15	4.94	4,387
2029	4.87	4.59	10.3	19.8	0.03	0.29	1.33	1.63	0.27	0.32	0.59	—	4,297	4,297	0.13	0.11	4.41	4,338
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.10	3.23	34.6	30.8	0.10	1.23	10.9	12.1	1.10	4.11	5.22	—	12,362	12,362	0.55	0.96	0.32	12,663
2027	4.95	4.66	11.3	18.9	0.03	0.36	1.33	1.70	0.34	0.32	0.65	—	4,236	4,236	0.15	0.15	0.14	4,285
2028	4.89	4.61	10.8	18.7	0.03	0.32	1.33	1.66	0.29	0.32	0.61	—	4,200	4,200	0.14	0.15	0.13	4,250
2029	4.83	4.56	10.4	18.4	0.03	0.29	1.33	1.63	0.27	0.32	0.59	—	4,166	4,166	0.14	0.15	0.11	4,214
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.87	1.50	15.1	13.9	0.04	0.56	4.24	4.80	0.51	1.72	2.23	—	4,638	4,638	0.20	0.32	1.82	4,740
2027	3.00	2.81	7.52	12.5	0.02	0.25	0.80	1.05	0.23	0.19	0.42	—	2,726	2,726	0.09	0.09	1.43	2,758
2028	3.50	3.30	7.69	13.4	0.02	0.23	0.94	1.18	0.21	0.23	0.44	—	3,028	3,028	0.10	0.11	1.53	3,065
2029	3.29	3.10	6.86	12.2	0.02	0.19	0.88	1.07	0.18	0.21	0.39	—	2,783	2,783	0.09	0.10	1.27	2,815

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.34	0.27	2.76	2.54	0.01	0.10	0.77	0.88	0.09	0.31	0.41	—	768	768	0.03	0.05	0.30	785
2027	0.55	0.51	1.37	2.28	< 0.005	0.05	0.15	0.19	0.04	0.03	0.08	—	451	451	0.02	0.02	0.24	457
2028	0.64	0.60	1.40	2.45	< 0.005	0.04	0.17	0.21	0.04	0.04	0.08	—	501	501	0.02	0.02	0.25	507
2029	0.60	0.57	1.25	2.23	< 0.005	0.04	0.16	0.20	0.03	0.04	0.07	—	461	461	0.02	0.02	0.21	466

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.14	3.31	34.5	31.7	0.10	1.33	21.0	22.3	1.20	10.5	11.7	—	12,384	12,384	0.55	0.96	12.5	12,697
2027	4.99	4.74	11.2	20.5	0.03	0.36	1.33	1.70	0.34	0.32	0.65	—	4,372	4,372	0.14	0.15	5.48	4,426
2028	4.92	4.64	10.7	20.1	0.03	0.32	1.33	1.66	0.29	0.32	0.61	—	4,334	4,334	0.14	0.15	4.94	4,387
2029	4.87	4.59	10.3	19.8	0.03	0.29	1.33	1.63	0.27	0.32	0.59	—	4,297	4,297	0.13	0.11	4.41	4,338
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.10	3.23	34.6	30.8	0.10	1.23	10.9	12.1	1.10	4.11	5.22	—	12,362	12,362	0.55	0.96	0.32	12,663
2027	4.95	4.66	11.3	18.9	0.03	0.36	1.33	1.70	0.34	0.32	0.65	—	4,236	4,236	0.15	0.15	0.14	4,285
2028	4.89	4.61	10.8	18.7	0.03	0.32	1.33	1.66	0.29	0.32	0.61	—	4,200	4,200	0.14	0.15	0.13	4,250
2029	4.83	4.56	10.4	18.4	0.03	0.29	1.33	1.63	0.27	0.32	0.59	—	4,166	4,166	0.14	0.15	0.11	4,214
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.87	1.50	15.1	13.9	0.04	0.56	4.24	4.80	0.51	1.72	2.23	—	4,638	4,638	0.20	0.32	1.82	4,740
2027	3.00	2.81	7.52	12.5	0.02	0.25	0.80	1.05	0.23	0.19	0.42	—	2,726	2,726	0.09	0.09	1.43	2,758
2028	3.50	3.30	7.69	13.4	0.02	0.23	0.94	1.18	0.21	0.23	0.44	—	3,028	3,028	0.10	0.11	1.53	3,065
2029	3.29	3.10	6.86	12.2	0.02	0.19	0.88	1.07	0.18	0.21	0.39	—	2,783	2,783	0.09	0.10	1.27	2,815
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	0.34	0.27	2.76	2.54	0.01	0.10	0.77	0.88	0.09	0.31	0.41	—	768	768	0.03	0.05	0.30	785
2027	0.55	0.51	1.37	2.28	< 0.005	0.05	0.15	0.19	0.04	0.03	0.08	—	451	451	0.02	0.02	0.24	457
2028	0.64	0.60	1.40	2.45	< 0.005	0.04	0.17	0.21	0.04	0.04	0.08	—	501	501	0.02	0.02	0.25	507
2029	0.60	0.57	1.25	2.23	< 0.005	0.04	0.16	0.20	0.03	0.04	0.07	—	461	461	0.02	0.02	0.21	466

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16.4	15.7	7.25	68.7	0.14	0.20	11.1	11.3	0.19	2.82	3.01	132	15,577	15,709	14.2	0.70	37.0	16,309
Mit.	16.4	15.7	7.25	68.7	0.14	0.20	11.1	11.3	0.19	2.82	3.01	132	14,956	15,088	14.1	0.69	37.0	15,682
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	4%	4%	1%	2%	—	4%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	14.7	14.0	8.16	52.3	0.13	0.19	11.1	11.3	0.19	2.82	3.01	132	14,533	14,665	14.2	0.75	2.91	15,249
Mit.	14.7	14.0	8.16	52.3	0.13	0.19	11.1	11.3	0.19	2.82	3.01	132	13,912	14,044	14.1	0.74	2.91	14,622
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	4%	4%	1%	2%	—	4%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.2	14.5	7.76	55.8	0.13	0.20	11.0	11.2	0.19	2.79	2.98	132	14,759	14,891	14.2	0.73	17.1	15,479
Mit.	15.2	14.5	7.76	55.8	0.13	0.20	11.0	11.2	0.19	2.79	2.98	132	14,138	14,270	14.1	0.71	17.1	14,852
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	4%	4%	1%	2%	—	4%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.77	2.64	1.42	10.2	0.02	0.04	2.00	2.04	0.03	0.51	0.54	21.9	2,443	2,465	2.35	0.12	2.83	2,563

Mit.	2.77	2.64	1.42	10.2	0.02	0.04	2.00	2.04	0.03	0.51	0.54	21.9	2,341	2,363	2.33	0.12	2.83	2,459
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	4%	4%	1%	2%	—	4%

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.54	7.90	6.00	57.5	0.13	0.10	11.1	11.2	0.09	2.82	2.92	—	13,314	13,314	0.64	0.65	35.0	13,559
Area	7.77	7.71	0.10	10.6	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.2
Energy	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	2,215	2,215	0.25	0.02	—	2,227
Water	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Waste	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Total	16.4	15.7	7.25	68.7	0.14	0.20	11.1	11.3	0.19	2.82	3.01	132	15,577	15,709	14.2	0.70	37.0	16,309
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.83	7.16	7.00	51.8	0.12	0.10	11.1	11.2	0.09	2.82	2.92	—	12,299	12,299	0.73	0.70	0.91	12,528
Area	6.75	6.75	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	2,215	2,215	0.25	0.02	—	2,227
Water	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Waste	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Total	14.7	14.0	8.16	52.3	0.13	0.19	11.1	11.3	0.19	2.82	3.01	132	14,533	14,665	14.2	0.75	2.91	15,249
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.81	7.16	6.55	50.1	0.12	0.10	11.0	11.1	0.09	2.79	2.88	—	12,511	12,511	0.67	0.68	15.1	12,744

Area	7.26	7.23	0.05	5.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	14.3	14.3	< 0.005	< 0.005	—	14.4
Energy	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	2,215	2,215	0.25	0.02	—	2,227
Water	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Waste	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Total	15.2	14.5	7.76	55.8	0.13	0.20	11.0	11.2	0.19	2.79	2.98	132	14,759	14,891	14.2	0.73	17.1	15,479
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.43	1.31	1.20	9.14	0.02	0.02	2.00	2.02	0.02	0.51	0.53	—	2,071	2,071	0.11	0.11	2.50	2,110
Area	1.32	1.32	0.01	0.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.38
Energy	0.02	0.01	0.21	0.10	< 0.005	0.02	—	0.02	0.02	—	0.02	—	367	367	0.04	< 0.005	—	369
Water	—	—	—	—	—	—	—	—	—	—	—	2.26	3.00	5.26	0.23	0.01	—	12.7
Waste	—	—	—	—	—	—	—	—	—	—	—	19.7	0.00	19.7	1.96	0.00	—	68.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Total	2.77	2.64	1.42	10.2	0.02	0.04	2.00	2.04	0.03	0.51	0.54	21.9	2,443	2,465	2.35	0.12	2.83	2,563

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	8.54	7.90	6.00	57.5	0.13	0.10	11.1	11.2	0.09	2.82	2.92	—	13,314	13,314	0.64	0.65	35.0	13,559
Area	7.77	7.71	0.10	10.6	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.2
Energy	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	1,594	1,594	0.15	0.01	—	1,600
Water	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Waste	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Total	16.4	15.7	7.25	68.7	0.14	0.20	11.1	11.3	0.19	2.82	3.01	132	14,956	15,088	14.1	0.69	37.0	15,682

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.83	7.16	7.00	51.8	0.12	0.10	11.1	11.2	0.09	2.82	2.92	—	12,299	12,299	0.73	0.70	0.91	12,528
Area	6.75	6.75	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	1,594	1,594	0.15	0.01	—	1,600
Water	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Waste	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Total	14.7	14.0	8.16	52.3	0.13	0.19	11.1	11.3	0.19	2.82	3.01	132	13,912	14,044	14.1	0.74	2.91	14,622
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.81	7.16	6.55	50.1	0.12	0.10	11.0	11.1	0.09	2.79	2.88	—	12,511	12,511	0.67	0.68	15.1	12,744
Area	7.26	7.23	0.05	5.21	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	14.3	14.3	< 0.005	< 0.005	—	14.4
Energy	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	1,594	1,594	0.15	0.01	—	1,600
Water	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Waste	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Total	15.2	14.5	7.76	55.8	0.13	0.20	11.0	11.2	0.19	2.79	2.98	132	14,138	14,270	14.1	0.71	17.1	14,852
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.43	1.31	1.20	9.14	0.02	0.02	2.00	2.02	0.02	0.51	0.53	—	2,071	2,071	0.11	0.11	2.50	2,110
Area	1.32	1.32	0.01	0.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.38
Energy	0.02	0.01	0.21	0.10	< 0.005	0.02	—	0.02	0.02	—	0.02	—	264	264	0.03	< 0.005	—	265
Water	—	—	—	—	—	—	—	—	—	—	—	2.26	3.00	5.26	0.23	0.01	—	12.7
Waste	—	—	—	—	—	—	—	—	—	—	—	19.7	0.00	19.7	1.96	0.00	—	68.8
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33
Total	2.77	2.64	1.42	10.2	0.02	0.04	2.00	2.04	0.03	0.51	0.54	21.9	2,341	2,363	2.33	0.12	2.83	2,459

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.37	0.37	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.45	0.38	3.39	3.12	0.01	0.14	—	0.14	0.13	—	0.13	—	563	563	0.02	< 0.005	—	565
Demolition	—	—	—	—	—	—	0.06	0.06	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.62	0.57	< 0.005	0.03	—	0.03	0.02	—	0.02	—	93.3	93.3	< 0.005	< 0.005	—	93.6
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.84	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	166	166	< 0.005	0.01	0.59	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	0.01	0.35	0.13	< 0.005	0.01	0.08	0.08	< 0.005	0.02	0.02	—	291	291	0.01	0.05	0.61	306
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	25.0	25.0	< 0.005	< 0.005	0.04	25.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	47.8	47.8	< 0.005	0.01	0.04	50.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.14	4.14	< 0.005	< 0.005	0.01	4.20
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.91	7.91	< 0.005	< 0.005	0.01	8.31

3.2. Demolition (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.37	0.37	—	0.06	0.06	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.45	0.38	3.39	3.12	0.01	0.14	—	0.14	0.13	—	0.13	—	563	563	0.02	< 0.005	—	565
Demolition	—	—	—	—	—	—	0.06	0.06	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.07	0.62	0.57	< 0.005	0.03	—	0.03	0.02	—	0.02	—	93.3	93.3	< 0.005	< 0.005	—	93.6
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.84	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	166	166	< 0.005	0.01	0.59	169
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.02	0.01	0.35	0.13	< 0.005	0.01	0.08	0.08	< 0.005	0.02	0.02	—	291	291	0.01	0.05	0.61	306
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	25.0	25.0	< 0.005	< 0.005	0.04	25.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	47.8	47.8	< 0.005	0.01	0.04	50.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.14	4.14	< 0.005	< 0.005	0.01	4.20
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.91	7.91	< 0.005	< 0.005	0.01	8.31

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	0.17	1.60	1.58	< 0.005	0.07	—	0.07	0.06	—	0.06	—	290	290	0.01	< 0.005	—	291
Dust From Material Movement	—	—	—	—	—	—	1.08	1.08	—	0.55	0.55	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.1	48.1	< 0.005	< 0.005	—	48.2
Dust From Material Movement	—	—	—	—	—	—	0.20	0.20	—	0.10	0.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.04	0.98	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	194	194	< 0.005	0.01	0.69	197
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.32	0.10	5.32	1.88	0.03	0.08	1.13	1.21	0.06	0.32	0.37	—	4,360	4,360	0.22	0.71	9.18	4,585
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.72	9.72	< 0.005	< 0.005	0.02	9.86
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	0.01	0.31	0.10	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	239	239	0.01	0.04	0.22	251
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	39.6	39.6	< 0.005	0.01	0.04	41.6

3.4. Site Preparation (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.21	0.17	1.60	1.58	< 0.005	0.07	—	0.07	0.06	—	0.06	—	290	290	0.01	< 0.005	—	291
Dust From Material Movement	—	—	—	—	—	—	1.08	1.08	—	0.55	0.55	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.29	< 0.005	0.01	—	0.01	0.01	—	0.01	—	48.1	48.1	< 0.005	< 0.005	—	48.2
Dust From Material Movement	—	—	—	—	—	—	0.20	0.20	—	0.10	0.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.04	0.98	0.00	0.00	0.18	0.18	0.00	0.04	0.04	—	194	194	< 0.005	0.01	0.69	197
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.32	0.10	5.32	1.88	0.03	0.08	1.13	1.21	0.06	0.32	0.37	—	4,360	4,360	0.22	0.71	9.18	4,585
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.72	9.72	< 0.005	< 0.005	0.02	9.86
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	0.01	0.31	0.10	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	239	239	0.01	0.04	0.22	251
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.61	1.61	< 0.005	< 0.005	< 0.005	1.63
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.06	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	39.6	39.6	< 0.005	0.01	0.04	41.6

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.26	9.26	—	3.66	3.66	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.26	9.26	—	3.66	3.66	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.99	0.83	7.46	7.55	0.02	0.31	—	0.31	0.28	—	0.28	—	1,808	1,808	0.07	0.01	—	1,814
Dust From Material Movement	—	—	—	—	—	—	2.54	2.54	—	1.00	1.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.36	1.38	< 0.005	0.06	—	0.06	0.05	—	0.05	—	299	299	0.01	< 0.005	—	300
Dust From Material Movement	—	—	—	—	—	—	0.46	0.46	—	0.18	0.18	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.05	1.12	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	222	222	< 0.005	0.01	0.79	225
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.41	0.12	6.79	2.39	0.04	0.11	1.44	1.55	0.07	0.40	0.48	—	5,564	5,564	0.28	0.90	11.7	5,851
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.07	0.84	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	< 0.005	0.01	0.02	200
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.40	0.12	7.31	2.42	0.04	0.11	1.44	1.55	0.07	0.40	0.48	—	5,566	5,566	0.28	0.90	0.30	5,841
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.23	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	55.6	55.6	< 0.005	< 0.005	0.09	56.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.11	0.03	1.96	0.66	0.01	0.03	0.39	0.42	0.02	0.11	0.13	—	1,525	1,525	0.08	0.25	1.39	1,601
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.20	9.20	< 0.005	< 0.005	0.02	9.33
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	0.01	0.36	0.12	< 0.005	0.01	0.07	0.08	< 0.005	0.02	0.02	—	252	252	0.01	0.04	0.23	265

3.6. Grading (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.26	9.26	—	3.66	3.66	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.26	9.26	—	3.66	3.66	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.99	0.83	7.46	7.55	0.02	0.31	—	0.31	0.28	—	0.28	—	1,808	1,808	0.07	0.01	—	1,814
Dust From Material Movement	—	—	—	—	—	—	2.54	2.54	—	1.00	1.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	0.15	1.36	1.38	< 0.005	0.06	—	0.06	0.05	—	0.05	—	299	299	0.01	< 0.005	—	300
Dust From Material Movement	—	—	—	—	—	—	0.46	0.46	—	0.18	0.18	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.05	1.12	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	222	222	< 0.005	0.01	0.79	225

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.41	0.12	6.79	2.39	0.04	0.11	1.44	1.55	0.07	0.40	0.48	—	5,564	5,564	0.28	0.90	11.7	5,851
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.07	0.84	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	< 0.005	0.01	0.02	200
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.40	0.12	7.31	2.42	0.04	0.11	1.44	1.55	0.07	0.40	0.48	—	5,566	5,566	0.28	0.90	0.30	5,841
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.23	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	55.6	55.6	< 0.005	< 0.005	0.09	56.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.11	0.03	1.96	0.66	0.01	0.03	0.39	0.42	0.02	0.11	0.13	—	1,525	1,525	0.08	0.25	1.39	1,601
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.20	9.20	< 0.005	< 0.005	0.02	9.33
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.02	0.01	0.36	0.12	< 0.005	0.01	0.07	0.08	< 0.005	0.02	0.02	—	252	252	0.01	0.04	0.23	265

3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	0.61	5.59	7.70	0.01	0.20	—	0.20	0.18	—	0.18	—	1,426	1,426	0.06	0.01	—	1,431
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.02	1.40	< 0.005	0.04	—	0.04	0.03	—	0.03	—	236	236	0.01	< 0.005	—	237
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.38	0.25	5.12	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	1,056	1,056	0.01	0.04	3.48	1,071
Vendor	0.03	0.02	0.69	0.26	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	574	574	0.02	0.09	1.30	602
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.35	0.31	0.32	3.85	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	942	942	0.02	0.04	0.09	954

Vendor	0.03	0.02	0.74	0.27	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	574	574	0.02	0.09	0.03	601
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.18	0.17	2.32	0.00	0.00	0.58	0.58	0.00	0.13	0.13	—	575	575	0.01	0.02	0.89	583
Vendor	0.02	0.01	0.43	0.16	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	342	342	0.01	0.05	0.34	358
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.03	0.42	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	95.2	95.2	< 0.005	< 0.005	0.15	96.5
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	56.6	56.6	< 0.005	0.01	0.06	59.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	0.61	5.59	7.70	0.01	0.20	—	0.20	0.18	—	0.18	—	1,426	1,426	0.06	0.01	—	1,431
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.02	1.40	< 0.005	0.04	—	0.04	0.03	—	0.03	—	236	236	0.01	< 0.005	—	237
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.38	0.25	5.12	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	1,056	1,056	0.01	0.04	3.48	1,071
Vendor	0.03	0.02	0.69	0.26	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	574	574	0.02	0.09	1.30	602
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.35	0.31	0.32	3.85	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	942	942	0.02	0.04	0.09	954
Vendor	0.03	0.02	0.74	0.27	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	—	574	574	0.02	0.09	0.03	601
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.18	0.17	2.32	0.00	0.00	0.58	0.58	0.00	0.13	0.13	—	575	575	0.01	0.02	0.89	583
Vendor	0.02	0.01	0.43	0.16	< 0.005	< 0.005	0.09	0.10	< 0.005	0.03	0.03	—	342	342	0.01	0.05	0.34	358

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.03	0.42	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	95.2	95.2	< 0.005	< 0.005	0.15	96.5
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	—	56.6	56.6	< 0.005	0.01	0.06	59.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.39	9.26	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.17	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.37	0.33	0.21	4.84	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	1,035	1,035	0.01	0.04	3.15	1,050
Vendor	0.03	0.02	0.67	0.25	< 0.005	0.01	0.16	0.17	< 0.005	0.04	0.05	—	561	561	0.02	0.09	1.15	588
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.34	0.30	0.29	3.63	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	923	923	0.02	0.04	0.08	936
Vendor	0.03	0.02	0.71	0.26	< 0.005	0.01	0.16	0.17	< 0.005	0.04	0.05	—	561	561	0.02	0.09	0.03	587
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.18	2.65	0.00	0.00	0.69	0.69	0.00	0.16	0.16	—	678	678	0.01	0.03	0.97	687
Vendor	0.02	0.01	0.50	0.18	< 0.005	0.01	0.11	0.12	< 0.005	0.03	0.03	—	402	402	0.01	0.06	0.36	421
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.48	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	112	112	< 0.005	< 0.005	0.16	114
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	66.5	66.5	< 0.005	0.01	0.06	69.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.39	9.26	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.17	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.37	0.33	0.21	4.84	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	1,035	1,035	0.01	0.04	3.15	1,050
Vendor	0.03	0.02	0.67	0.25	< 0.005	0.01	0.16	0.17	< 0.005	0.04	0.05	—	561	561	0.02	0.09	1.15	588
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.34	0.30	0.29	3.63	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	923	923	0.02	0.04	0.08	936
Vendor	0.03	0.02	0.71	0.26	< 0.005	0.01	0.16	0.17	< 0.005	0.04	0.05	—	561	561	0.02	0.09	0.03	587
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.22	0.18	2.65	0.00	0.00	0.69	0.69	0.00	0.16	0.16	—	678	678	0.01	0.03	0.97	687
Vendor	0.02	0.01	0.50	0.18	< 0.005	0.01	0.11	0.12	< 0.005	0.03	0.03	—	402	402	0.01	0.06	0.36	421
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.48	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	112	112	< 0.005	< 0.005	0.16	114
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	66.5	66.5	< 0.005	0.01	0.06	69.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.76	0.64	5.68	8.53	0.02	0.18	—	0.18	0.17	—	0.17	—	1,585	1,585	0.06	0.01	—	1,591
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.04	1.56	< 0.005	0.03	—	0.03	0.03	—	0.03	—	262	262	0.01	< 0.005	—	263
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.35	0.32	0.21	4.59	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	1,017	1,017	0.01	0.01	2.83	1,022
Vendor	0.03	0.01	0.64	0.24	< 0.005	< 0.005	0.16	0.16	< 0.005	0.04	0.05	—	546	546	0.02	0.08	1.02	572
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.33	0.29	0.28	3.42	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	908	908	0.02	0.04	0.07	920
Vendor	0.03	0.01	0.69	0.25	< 0.005	< 0.005	0.16	0.16	< 0.005	0.04	0.05	—	547	547	0.02	0.08	0.03	572
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.19	0.16	2.30	0.00	0.00	0.64	0.64	0.00	0.15	0.15	—	616	616	0.01	0.02	0.81	624
Vendor	0.02	0.01	0.44	0.16	< 0.005	< 0.005	0.10	0.11	< 0.005	0.03	0.03	—	361	361	0.01	0.05	0.29	378
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.03	0.42	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	102	102	< 0.005	< 0.005	0.13	103
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	59.8	59.8	< 0.005	0.01	0.05	62.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Building Construction (2029) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.76	0.64	5.68	8.53	0.02	0.18	—	0.18	0.17	—	0.17	—	1,585	1,585	0.06	0.01	—	1,591
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.04	1.56	< 0.005	0.03	—	0.03	0.03	—	0.03	—	262	262	0.01	< 0.005	—	263
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.35	0.32	0.21	4.59	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	1,017	1,017	0.01	0.01	2.83	1,022
Vendor	0.03	0.01	0.64	0.24	< 0.005	< 0.005	0.16	0.16	< 0.005	0.04	0.05	—	546	546	0.02	0.08	1.02	572
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.33	0.29	0.28	3.42	0.00	0.00	0.98	0.98	0.00	0.23	0.23	—	908	908	0.02	0.04	0.07	920
Vendor	0.03	0.01	0.69	0.25	< 0.005	< 0.005	0.16	0.16	< 0.005	0.04	0.05	—	547	547	0.02	0.08	0.03	572
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.19	0.16	2.30	0.00	0.00	0.64	0.64	0.00	0.15	0.15	—	616	616	0.01	0.02	0.81	624
Vendor	0.02	0.01	0.44	0.16	< 0.005	< 0.005	0.10	0.11	< 0.005	0.03	0.03	—	361	361	0.01	0.05	0.29	378
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.03	0.42	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	102	102	< 0.005	< 0.005	0.13	103
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	59.8	59.8	< 0.005	0.01	0.05	62.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Paving (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.04	0.03	0.32	0.45	< 0.005	0.01	—	0.01	0.01	—	0.01	—	68.0	68.0	< 0.005	< 0.005	—	68.2
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.3
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.63	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	148	148	< 0.005	0.01	0.02	150
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.85	6.85	< 0.005	< 0.005	0.01	6.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.13	1.13	< 0.005	< 0.005	< 0.005	1.15
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Paving (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.12	9.94	0.01	0.32	—	0.32	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.32	0.45	< 0.005	0.01	—	0.01	0.01	—	0.01	—	68.0	68.0	< 0.005	< 0.005	—	68.2
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.3
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.05	0.63	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	148	148	< 0.005	0.01	0.02	150
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.85	6.85	< 0.005	< 0.005	0.01	6.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.13	1.13	< 0.005	< 0.005	< 0.005	1.15
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.83	1.19	< 0.005	0.04	—	0.04	0.03	—	0.03	—	180	180	0.01	< 0.005	—	181
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.22	< 0.005	0.01	—	0.01	0.01	—	0.01	—	29.9	29.9	< 0.005	< 0.005	—	30.0
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.60	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	146	146	< 0.005	0.01	0.01	148
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.8	17.8	< 0.005	< 0.005	0.03	18.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.95	2.95	< 0.005	< 0.005	< 0.005	3.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.16. Paving (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.83	1.19	< 0.005	0.04	—	0.04	0.03	—	0.03	—	180	180	0.01	< 0.005	—	181
Paving	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.22	< 0.005	0.01	—	0.01	0.01	—	0.01	—	29.9	29.9	< 0.005	< 0.005	—	30.0
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.60	0.00	0.00	0.15	0.15	0.00	0.04	0.04	—	146	146	< 0.005	0.01	0.01	148
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17.8	17.8	< 0.005	< 0.005	0.03	18.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.95	2.95	< 0.005	< 0.005	< 0.005	3.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.06	0.47	0.64	< 0.005	0.01	—	0.01	0.01	—	0.01	—	75.8	75.8	< 0.005	< 0.005	—	76.0
Architectural Coatings	1.78	1.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.5	12.5	< 0.005	< 0.005	—	12.6
Architectural Coatings	0.32	0.32	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.05	1.02	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	< 0.005	0.01	0.70	214
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.77	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	188	188	< 0.005	0.01	0.02	191
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.44	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	110	110	< 0.005	< 0.005	0.17	111
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	18.2	18.2	< 0.005	< 0.005	0.03	18.4

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.18. Architectural Coating (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.08	0.06	0.47	0.64	< 0.005	0.01	—	0.01	0.01	—	0.01	—	75.8	75.8	< 0.005	< 0.005	—	76.0
Architectural Coatings	1.78	1.78	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.12	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.5	12.5	< 0.005	< 0.005	—	12.6
Architectural Coatings	0.32	0.32	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.05	1.02	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	211	211	< 0.005	0.01	0.70	214
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.77	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	188	188	< 0.005	0.01	0.02	191
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.44	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	110	110	< 0.005	< 0.005	0.17	111

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	18.2	18.2	< 0.005	< 0.005	0.03	18.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.19. Architectural Coating (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134

Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.58	0.80	< 0.005	0.01	—	0.01	0.01	—	0.01	—	95.6	95.6	< 0.005	< 0.005	—	96.0
Architectural Coatings	2.24	2.24	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.11	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.8	15.8	< 0.005	< 0.005	—	15.9
Architectural Coatings	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.97	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	< 0.005	0.01	0.63	210
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.73	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	185	185	< 0.005	0.01	0.02	187
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.53	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	136	136	< 0.005	0.01	0.19	137
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	22.5	22.5	< 0.005	< 0.005	0.03	22.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.20. Architectural Coating (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.08	0.58	0.80	< 0.005	0.01	—	0.01	0.01	—	0.01	—	95.6	95.6	< 0.005	< 0.005	—	96.0
Architectural Coatings	2.24	2.24	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.11	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.8	15.8	< 0.005	< 0.005	—	15.9
Architectural Coatings	0.41	0.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.97	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	207	207	< 0.005	0.01	0.63	210
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.73	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	185	185	< 0.005	0.01	0.02	187
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.53	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	136	136	< 0.005	0.01	0.19	137
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	22.5	22.5	< 0.005	< 0.005	0.03	22.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.21. Architectural Coating (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road	0.12	0.10	0.79	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.79	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.55	0.77	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.0	92.0	< 0.005	< 0.005	—	92.3
Architectural Coatings	2.16	2.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.2	15.2	< 0.005	< 0.005	—	15.3

Architect Coatings	0.39	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.92	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	203	203	< 0.005	< 0.005	0.57	204
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.68	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	182	182	< 0.005	0.01	0.01	184
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.48	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	128	128	< 0.005	0.01	0.17	130
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.2	21.2	< 0.005	< 0.005	0.03	21.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.22. Architectural Coating (2029) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.79	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.79	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.13	3.13	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.55	0.77	< 0.005	0.01	—	0.01	0.01	—	0.01	—	92.0	92.0	< 0.005	< 0.005	—	92.3
Architectural Coatings	2.16	2.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.2	15.2	< 0.005	< 0.005	—	15.3
Architectural Coatings	0.39	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.04	0.92	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	203	203	< 0.005	< 0.005	0.57	204
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.68	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	182	182	< 0.005	0.01	0.01	184
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.03	0.48	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	128	128	< 0.005	0.01	0.17	130
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	0.01	0.01	—	21.2	21.2	< 0.005	< 0.005	0.03	21.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	5.04	4.68	3.48	33.3	0.07	0.06	6.37	6.42	0.05	1.62	1.67	—	7,648	7,648	0.37	0.38	20.1	7,789
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Condo/Townhouse High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	1.40	1.29	1.01	9.70	0.02	0.02	1.89	1.91	0.02	0.48	0.50	—	2,264	2,264	0.11	0.11	5.96	2,305
Recreational Swimming Pool	2.10	1.94	1.51	14.6	0.03	0.03	2.84	2.86	0.02	0.72	0.75	—	3,402	3,402	0.16	0.16	8.95	3,464
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Total	8.54	7.90	6.00	57.5	0.13	0.10	11.1	11.2	0.09	2.82	2.92	—	13,314	13,314	0.64	0.65	35.0	13,559
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	4.62	4.23	4.06	30.1	0.07	0.06	6.37	6.42	0.05	1.62	1.67	—	7,066	7,066	0.42	0.41	0.52	7,198
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Condo/Townhouse High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	1.28	1.17	1.17	8.67	0.02	0.02	1.89	1.91	0.02	0.48	0.50	—	2,091	2,091	0.12	0.12	0.15	2,129
Recreational Swimming Pool	1.93	1.76	1.76	13.0	0.03	0.03	2.84	2.86	0.02	0.72	0.75	—	3,143	3,143	0.18	0.18	0.23	3,200
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	7.83	7.16	7.00	51.8	0.12	0.10	11.1	11.2	0.09	2.82	2.92	—	12,299	12,299	0.73	0.70	0.91	12,528
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.84	0.77	0.69	5.30	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,190	1,190	0.07	0.06	1.44	1,212
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Condo/T High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.23	0.21	0.20	1.53	< 0.005	< 0.005	0.34	0.34	< 0.005	0.09	0.09	—	352	352	0.02	0.02	0.43	359
Recreational Swimming Pool	0.35	0.32	0.30	2.31	0.01	< 0.005	0.51	0.52	< 0.005	0.13	0.13	—	529	529	0.03	0.03	0.64	539
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.43	1.31	1.20	9.14	0.02	0.02	2.00	2.02	0.02	0.51	0.53	—	2,071	2,071	0.11	0.11	2.50	2,110

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	5.04	4.68	3.48	33.3	0.07	0.06	6.37	6.42	0.05	1.62	1.67	—	7,648	7,648	0.37	0.38	20.1	7,789
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Condo/Townhouse High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	1.40	1.29	1.01	9.70	0.02	0.02	1.89	1.91	0.02	0.48	0.50	—	2,264	2,264	0.11	0.11	5.96	2,305
Recreational Swimming Pool	2.10	1.94	1.51	14.6	0.03	0.03	2.84	2.86	0.02	0.72	0.75	—	3,402	3,402	0.16	0.16	8.95	3,464
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	8.54	7.90	6.00	57.5	0.13	0.10	11.1	11.2	0.09	2.82	2.92	—	13,314	13,314	0.64	0.65	35.0	13,559
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	4.62	4.23	4.06	30.1	0.07	0.06	6.37	6.42	0.05	1.62	1.67	—	7,066	7,066	0.42	0.41	0.52	7,198
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Condo/Townhouse High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	1.28	1.17	1.17	8.67	0.02	0.02	1.89	1.91	0.02	0.48	0.50	—	2,091	2,091	0.12	0.12	0.15	2,129

Recreational Swimmi Pool	1.93	1.76	1.76	13.0	0.03	0.03	2.84	2.86	0.02	0.72	0.75	—	3,143	3,143	0.18	0.18	0.23	3,200
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	7.83	7.16	7.00	51.8	0.12	0.10	11.1	11.2	0.09	2.82	2.92	—	12,299	12,299	0.73	0.70	0.91	12,528
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.84	0.77	0.69	5.30	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,190	1,190	0.07	0.06	1.44	1,212
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Condo/Townhouse High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	0.23	0.21	0.20	1.53	< 0.005	< 0.005	0.34	0.34	< 0.005	0.09	0.09	—	352	352	0.02	0.02	0.43	359
Recreational Swimming Pool	0.35	0.32	0.30	2.31	0.01	< 0.005	0.51	0.52	< 0.005	0.13	0.13	—	529	529	0.03	0.03	0.64	539
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.43	1.31	1.20	9.14	0.02	0.02	2.00	2.02	0.02	0.51	0.53	—	2,071	2,071	0.11	0.11	2.50	2,110

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	481	481	0.08	0.01	—	486
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	114	114	0.02	< 0.005	—	115
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	73.2	73.2	0.01	< 0.005	—	73.9
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	80.8	80.8	0.01	< 0.005	—	81.6
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	11.7	11.7	< 0.005	< 0.005	—	11.8
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	761	761	0.12	0.01	—	768
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	481	481	0.08	0.01	—	486
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	114	114	0.02	< 0.005	—	115
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	73.2	73.2	0.01	< 0.005	—	73.9
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	80.8	80.8	0.01	< 0.005	—	81.6
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	11.7	11.7	< 0.005	< 0.005	—	11.8
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	761	761	0.12	0.01	—	768
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	79.7	79.7	0.01	< 0.005	—	80.5

Apartments	—	—	—	—	—	—	—	—	—	—	—	—	18.8	18.8	< 0.005	< 0.005	—	19.0
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	12.1	12.1	< 0.005	< 0.005	—	12.2
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	13.4	13.4	< 0.005	< 0.005	—	13.5
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	1.94	1.94	< 0.005	< 0.005	—	1.96
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	126	126	0.02	< 0.005	—	127

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	56.8	56.8	0.01	< 0.005	—	57.4

Condo/T High Rise	—	—	—	—	—	—	—	—	—	—	—	—	36.6	36.6	0.01	< 0.005	—	37.0
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	40.4	40.4	0.01	< 0.005	—	40.8
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	5.86	5.86	< 0.005	< 0.005	—	5.92
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	140	140	0.02	< 0.005	—	141
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	56.8	56.8	0.01	< 0.005	—	57.4
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	36.6	36.6	0.01	< 0.005	—	37.0
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	40.4	40.4	0.01	< 0.005	—	40.8

Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	5.86	5.86	< 0.005	< 0.005	—	5.92
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	140	140	0.02	< 0.005	—	141
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	9.41	9.41	< 0.005	< 0.005	—	9.50
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	6.06	6.06	< 0.005	< 0.005	—	6.12
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	6.69	6.69	< 0.005	< 0.005	—	6.76
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	0.97	0.97	< 0.005	< 0.005	—	0.98
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

City Park	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	23.1	23.1	< 0.005	< 0.005	—	23.4

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.09	0.04	0.74	0.32	< 0.005	0.06	—	0.06	0.06	—	0.06	—	942	942	0.08	< 0.005	—	944
Apartments Mid Rise	0.02	0.01	0.16	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	199	199	0.02	< 0.005	—	199
Condo/Townhouse High Rise	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Health Club	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Total	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	1,455	1,455	0.13	< 0.005	—	1,459
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.09	0.04	0.74	0.32	< 0.005	0.06	—	0.06	0.06	—	0.06	—	942	942	0.08	< 0.005	—	944
Apartments Mid Rise	0.02	0.01	0.16	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	199	199	0.02	< 0.005	—	199
Condo/Townhouse High Rise	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Health Club	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	1,455	1,455	0.13	< 0.005	—	1,459
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.02	0.01	0.14	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	156	156	0.01	< 0.005	—	156
Apartments Mid Rise	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	32.9	32.9	< 0.005	< 0.005	—	33.0

Condo/T High Rise	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.2	21.2	< 0.005	< 0.005	—	21.3
Health Club	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	30.8	30.8	< 0.005	< 0.005	—	30.9
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.10	< 0.005	0.02	—	0.02	0.02	—	0.02	—	241	241	0.02	< 0.005	—	242

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.09	0.04	0.74	0.32	< 0.005	0.06	—	0.06	0.06	—	0.06	—	942	942	0.08	< 0.005	—	944
Apartments Mid Rise	0.02	0.01	0.16	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	199	199	0.02	< 0.005	—	199

Condo/Townhouse High Rise	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Health Club	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	1,455	1,455	0.13	< 0.005	—	1,459
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.09	0.04	0.74	0.32	< 0.005	0.06	—	0.06	0.06	—	0.06	—	942	942	0.08	< 0.005	—	944
Apartments Mid Rise	0.02	0.01	0.16	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	199	199	0.02	< 0.005	—	199
Condo/Townhouse High Rise	0.01	0.01	0.10	0.04	< 0.005	0.01	—	0.01	0.01	—	0.01	—	128	128	0.01	< 0.005	—	129
Health Club	0.02	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	—	186	186	0.02	< 0.005	—	187

Recreational Swimmi Pool	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.13	0.07	1.16	0.56	0.01	0.09	—	0.09	0.09	—	0.09	—	1,455	1,455	0.13	< 0.005	—	1,459
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.02	0.01	0.14	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	156	156	0.01	< 0.005	—	156
Apartments Mid Rise	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	32.9	32.9	< 0.005	< 0.005	—	33.0
Condo/Townhouse High Rise	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	21.2	21.2	< 0.005	< 0.005	—	21.3
Health Club	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	30.8	30.8	< 0.005	< 0.005	—	30.9
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

City Park	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.02	0.01	0.21	0.10	< 0.005	0.02	—	0.02	0.02	—	0.02	—	241	241	0.02	< 0.005	—	242

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	6.14	6.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.62	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.02	0.96	0.10	10.6	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	29.0	29.0	< 0.005	< 0.005	—	29.2
Total	7.77	7.71	0.10	10.6	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	6.14	6.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	0.62	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.75	6.75	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	1.12	1.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.09	0.09	0.01	0.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.37	2.37	< 0.005	< 0.005	—	2.38
Total	1.32	1.32	0.01	0.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.38

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	6.14	6.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.62	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	1.02	0.96	0.10	10.6	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	29.0	29.0	< 0.005	< 0.005	—	29.2
Total	7.77	7.71	0.10	10.6	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	29.0	29.0	< 0.005	< 0.005	—	29.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	6.14	6.14	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.62	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	6.75	6.75	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	1.12	1.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.09	0.09	0.01	0.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.37	2.37	< 0.005	< 0.005	—	2.38
Total	1.32	1.32	0.01	0.95	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	2.37	2.37	< 0.005	< 0.005	—	2.38

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	6.75	7.65	14.4	0.69	0.02	—	36.7
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.01	2.82	5.83	0.31	0.01	—	15.8
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	1.94	2.08	4.02	0.20	< 0.005	—	10.4
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.59	1.56	3.15	0.16	< 0.005	—	8.38
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	0.38	0.35	0.73	0.04	< 0.005	—	1.99
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	3.66	3.66	< 0.005	< 0.005	—	3.69
Total	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	6.75	7.65	14.4	0.69	0.02	—	36.7
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.01	2.82	5.83	0.31	0.01	—	15.8
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	1.94	2.08	4.02	0.20	< 0.005	—	10.4
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.59	1.56	3.15	0.16	< 0.005	—	8.38
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	0.38	0.35	0.73	0.04	< 0.005	—	1.99
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	3.66	3.66	< 0.005	< 0.005	—	3.69
Total	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1.12	1.27	2.38	0.11	< 0.005	—	6.07
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	0.50	0.47	0.97	0.05	< 0.005	—	2.61
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	0.32	0.34	0.67	0.03	< 0.005	—	1.72

Health Club	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26	0.52	0.03	< 0.005	—	1.39
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06	0.12	0.01	< 0.005	—	0.33
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.61	0.61	< 0.005	< 0.005	—	0.61
Total	—	—	—	—	—	—	—	—	—	—	—	2.26	3.00	5.26	0.23	0.01	—	12.7

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	6.75	7.65	14.4	0.69	0.02	—	36.7
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.01	2.82	5.83	0.31	0.01	—	15.8
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	1.94	2.08	4.02	0.20	< 0.005	—	10.4
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.59	1.56	3.15	0.16	< 0.005	—	8.38

Recreati Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	0.38	0.35	0.73	0.04	< 0.005	—	1.99
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	3.66	3.66	< 0.005	< 0.005	—	3.69
Total	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	6.75	7.65	14.4	0.69	0.02	—	36.7
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.01	2.82	5.83	0.31	0.01	—	15.8
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	1.94	2.08	4.02	0.20	< 0.005	—	10.4
Health Club	—	—	—	—	—	—	—	—	—	—	—	1.59	1.56	3.15	0.16	< 0.005	—	8.38
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	0.38	0.35	0.73	0.04	< 0.005	—	1.99
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	3.66	3.66	< 0.005	< 0.005	—	3.69
Total	—	—	—	—	—	—	—	—	—	—	—	13.7	18.1	31.8	1.40	0.03	—	76.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1.12	1.27	2.38	0.11	< 0.005	—	6.07
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	0.50	0.47	0.97	0.05	< 0.005	—	2.61
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	0.32	0.34	0.67	0.03	< 0.005	—	1.72
Health Club	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26	0.52	0.03	< 0.005	—	1.39
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06	0.12	0.01	< 0.005	—	0.33
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.00	0.61	0.61	< 0.005	< 0.005	—	0.61
Total	—	—	—	—	—	—	—	—	—	—	—	2.26	3.00	5.26	0.23	0.01	—	12.7

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	35.7	0.00	35.7	3.57	0.00	—	125
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	18.0	0.00	18.0	1.80	0.00	—	62.9
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	11.5	0.00	11.5	1.15	0.00	—	40.3
Health Club	—	—	—	—	—	—	—	—	—	—	—	43.0	0.00	43.0	4.30	0.00	—	150
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	10.4	0.00	10.4	1.04	0.00	—	36.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.15	0.00	0.15	0.01	0.00	—	0.52
Total	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	35.7	0.00	35.7	3.57	0.00	—	125

Apartme Mid Rise	—	—	—	—	—	—	—	—	—	—	—	18.0	0.00	18.0	1.80	0.00	—	62.9
Condo/T ownhou se High Rise	—	—	—	—	—	—	—	—	—	—	—	11.5	0.00	11.5	1.15	0.00	—	40.3
Health Club	—	—	—	—	—	—	—	—	—	—	—	43.0	0.00	43.0	4.30	0.00	—	150
Recreati onal Swimmi ng Pool	—	—	—	—	—	—	—	—	—	—	—	10.4	0.00	10.4	1.04	0.00	—	36.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.15	0.00	0.15	0.01	0.00	—	0.52
Total	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	5.91	0.00	5.91	0.59	0.00	—	20.7
Apartme nts Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.98	0.00	2.98	0.30	0.00	—	10.4
Condo/T ownhou se High Rise	—	—	—	—	—	—	—	—	—	—	—	1.91	0.00	1.91	0.19	0.00	—	6.67
Health Club	—	—	—	—	—	—	—	—	—	—	—	7.12	0.00	7.12	0.71	0.00	—	24.9

Recreational	—	—	—	—	—	—	—	—	—	—	—	1.72	0.00	1.72	0.17	0.00	—	6.01
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.02	0.00	0.02	< 0.005	0.00	—	0.09
Total	—	—	—	—	—	—	—	—	—	—	—	19.7	0.00	19.7	1.96	0.00	—	68.8

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	35.7	0.00	35.7	3.57	0.00	—	125
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	18.0	0.00	18.0	1.80	0.00	—	62.9
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	11.5	0.00	11.5	1.15	0.00	—	40.3
Health Club	—	—	—	—	—	—	—	—	—	—	—	43.0	0.00	43.0	4.30	0.00	—	150
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	10.4	0.00	10.4	1.04	0.00	—	36.3

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.15	0.00	0.15	0.01	0.00	—	0.52
Total	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	35.7	0.00	35.7	3.57	0.00	—	125
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	18.0	0.00	18.0	1.80	0.00	—	62.9
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	11.5	0.00	11.5	1.15	0.00	—	40.3
Health Club	—	—	—	—	—	—	—	—	—	—	—	43.0	0.00	43.0	4.30	0.00	—	150
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	10.4	0.00	10.4	1.04	0.00	—	36.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.15	0.00	0.15	0.01	0.00	—	0.52
Total	—	—	—	—	—	—	—	—	—	—	—	119	0.00	119	11.9	0.00	—	415

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	5.91	0.00	5.91	0.59	0.00	—	20.7
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	2.98	0.00	2.98	0.30	0.00	—	10.4
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	1.91	0.00	1.91	0.19	0.00	—	6.67
Health Club	—	—	—	—	—	—	—	—	—	—	—	7.12	0.00	7.12	0.71	0.00	—	24.9
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	1.72	0.00	1.72	0.17	0.00	—	6.01
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
City Park	—	—	—	—	—	—	—	—	—	—	—	0.02	0.00	0.02	< 0.005	0.00	—	0.09
Total	—	—	—	—	—	—	—	—	—	—	—	19.7	0.00	19.7	1.96	0.00	—	68.8

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.41	1.41
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.07	0.07
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.41	1.41
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20

Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.07	0.07
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.23	0.23
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.41	1.41
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.07	0.07
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.41	1.41
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.31	0.31

Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.07	0.07
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.00	2.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.23	0.23
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.05	0.05
Condo/Townhouse High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
City Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.33	0.33

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	4/1/2026	6/23/2026	5.00	60.0	—
Site Preparation	Site Preparation	6/24/2026	7/21/2026	5.00	20.0	—
Grading	Grading	7/22/2026	12/8/2026	5.00	100	—
Building Construction	Building Construction	3/3/2027	12/4/2029	5.00	720	—
Paving	Paving	12/9/2026	3/2/2027	5.00	60.0	—
Architectural Coating	Architectural Coating	3/17/2027	12/18/2029	5.00	720	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—

Demolition	Worker	15.0	14.3	LDA,LDT1,LDT2
Demolition	Vendor	—	8.80	HHDT,MHDT
Demolition	Hauling	4.17	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	14.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.80	HHDT,MHDT
Site Preparation	Hauling	62.5	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	14.3	LDA,LDT1,LDT2
Grading	Vendor	—	8.80	HHDT,MHDT
Grading	Hauling	79.8	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	96.9	14.3	LDA,LDT1,LDT2
Building Construction	Vendor	21.6	8.80	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	14.3	LDA,LDT1,LDT2
Paving	Vendor	—	8.80	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	19.4	14.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.80	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT

Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	14.3	LDA,LDT1,LDT2
Demolition	Vendor	—	8.80	HHDT,MHDT
Demolition	Hauling	4.17	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	14.3	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.80	HHDT,MHDT
Site Preparation	Hauling	62.5	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	14.3	LDA,LDT1,LDT2
Grading	Vendor	—	8.80	HHDT,MHDT
Grading	Hauling	79.8	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	96.9	14.3	LDA,LDT1,LDT2
Building Construction	Vendor	21.6	8.80	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	14.3	LDA,LDT1,LDT2
Paving	Vendor	—	8.80	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT

Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	19.4	14.3	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.80	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	542,680	180,893	21,000	7,000	16,440

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	21,700	—
Site Preparation	—	10,000	30.0	0.00	—
Grading	63,800	—	300	0.00	—
Paving	0.00	0.00	0.00	0.00	7.40

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	1.11	0%
Apartments Mid Rise	—	0%
Condo/Townhouse High Rise	—	0%
Health Club	0.00	0%
Recreational Swimming Pool	0.00	0%
Parking Lot	0.55	100%
Other Asphalt Surfaces	5.74	100%
City Park	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005
2029	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	1,250	1,250	1,250	456,241	8,929	8,929	8,929	3,258,935
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Condo/Townhouse High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	338	338	338	123,371	2,650	2,650	2,650	967,226
Recreational Swimming Pool	508	508	508	185,421	3,983	3,983	3,983	1,453,696
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	1,250	1,250	1,250	456,241	8,929	8,929	8,929	3,258,935
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Condo/Townhouse High Rise	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Health Club	338	338	338	123,371	2,650	2,650	2,650	967,226
Recreational Swimming Pool	508	508	508	185,421	3,983	3,983	3,983	1,453,696
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
City Park	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	101
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	45
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Condo/Townhouse High Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	29
Conventional Wood Stoves	0

Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	101
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	45
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0
Condo/Townhouse High Rise	—
Wood Fireplaces	0

Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	29
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
542679.75	180,893	21,000	7,000	16,440

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	861,097	204	0.0330	0.0040	2,938,093
Apartments Mid Rise	203,301	204	0.0330	0.0040	620,662
Condo/Townhouse High Rise	131,017	204	0.0330	0.0040	399,982
Health Club	144,619	204	0.0330	0.0040	580,421
Recreational Swimming Pool	0.00	204	0.0330	0.0040	0.00
Parking Lot	20,987	204	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00
City Park	0.00	204	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	0.00	204	0.0330	0.0040	2,938,093
Apartments Mid Rise	101,651	204	0.0330	0.0040	620,662
Condo/Townhouse High Rise	65,508	204	0.0330	0.0040	399,982
Health Club	72,310	204	0.0330	0.0040	580,421
Recreational Swimming Pool	0.00	204	0.0330	0.0040	0.00
Parking Lot	10,494	204	0.0330	0.0040	0.00
Other Asphalt Surfaces	0.00	204	0.0330	0.0040	0.00
City Park	0.00	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	3,523,004	1,647,316
Apartments Mid Rise	1,569,655	82,359

Condo/Townhouse High Rise	1,011,556	347,312
Health Club	828,004	125,789
Recreational Swimming Pool	199,608	0.00
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00
City Park	0.00	4,056,277

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	3,523,004	1,647,316
Apartments Mid Rise	1,569,655	82,359
Condo/Townhouse High Rise	1,011,556	347,312
Health Club	828,004	125,789
Recreational Swimming Pool	199,608	0.00
Parking Lot	0.00	0.00
Other Asphalt Surfaces	0.00	0.00
City Park	0.00	4,056,277

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	66.2	—
Apartments Mid Rise	33.4	—
Condo/Townhouse High Rise	21.4	—
Health Club	79.8	—
Recreational Swimming Pool	19.2	—
Parking Lot	0.00	—

Other Asphalt Surfaces	0.00	—
City Park	0.28	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	66.2	—
Apartments Mid Rise	33.4	—
Condo/Townhouse High Rise	21.4	—
Health Club	79.8	—
Recreational Swimming Pool	19.2	—
Parking Lot	0.00	—
Other Asphalt Surfaces	0.00	—
City Park	0.28	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

Condo/Townhouse High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Health Club	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Health Club	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Recreational Swimming Pool	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Recreational Swimming Pool	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

Condo/Townhouse High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Health Club	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Health Club	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Recreational Swimming Pool	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Recreational Swimming Pool	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

8. User Changes to Default Data

Screen	Justification
Land Use	Land use adjustments made based on project-specific information.
Construction: Construction Phases	Construction phase timing based on applicant provided information. Based on typical construction practices, architectural coating assumed to start two weeks after the start of building construction and last for the same number of days.
Construction: On-Road Fugitive Dust	All roads in the project vicinity are paved.
Operations: Vehicle Data	Trip generation rates and VMT adjusted consistent with project-specific data provided by Fehr & Peers.
Operations: Road Dust	All roads in the project area are paved.