

Point of Use/Point of Entry Ordinance Amendments

Draft Addendum to the 2010 Monterey County General Plan Environmental Impact Report

State Clearinghouse No. 2007121001

prepared by

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Introduction

This section provides an overview of the Point of Use/Point of Entry (POU/POE) Ordinance Amendments and the 2010 General Plan Environmental Impact Report (EIR) to provide context for this Addendum.

1. Basis for an Addendum

This document is an Addendum to the *2010 Monterey County General Plan Environmental Impact Report* (2010 General Plan EIR; SCH# 2007121001) for the adoption and implementation of the revised and reinstated POU/POE Ordinance (referred to herein as the "Ordinance" or "project"). Refer to the *Project Description* for a detailed discussion of the Ordinance.

In accordance with Section 15164 of the California Environmental Quality Act (CEQA) Guidelines, codified in Sections 15000 et seq. of Title 14 of the California Code of Regulations, the lead agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15612 calling for preparation of a subsequent EIR have occurred. Under Section 15162 (a), where an EIR has been certified for a project, no subsequent EIR shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, that there are substantial changes in the project or circumstances or substantially important new information that will cause the project to have significant new impacts or substantially increase previously identified significant impacts.

Specifically, the CEQA Guidelines state:

- The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred (Section 15164(a))
- An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration (Section 15164(c))
- The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to deciding on the project (Section 15164(d))
- A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence (Section 15164(e))

According to Section 15164 of the CEQA Guidelines, an addendum to a previously certified EIR is the appropriate environmental document when "some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of subsequent EIR have occurred." This Addendum has been prepared in accordance with relevant provisions of CEQA (California Public Resources Code Section 21000, *et seq.*) and the CEQA Guidelines, and is intended to be read together with, and as a part of, Monterey County's 2010 General Plan EIR.

The 2010 General Plan EIR is the primary environmental document for the proposed project. Although the adopted 2010 General Plan applies only in the inland unincorporated area of the County, the 2010 General Plan EIR assessed impacts related to planned buildout of Monterey County, including both inland and coastal zone areas, through the year 2030. Therefore, the scope and impact determinations of the 2010 General Plan EIR provide an appropriate and sufficient environmental baseline for evaluation of the reinstated Ordinance.

This Addendum describes the specific details of the POU/POE Ordinance Amendments and evaluates whether its reinstatement would result in new or more severe environmental impacts beyond those already analyzed and disclosed in the 2010 General Plan EIR. The analysis herein demonstrates that

implementation of the Ordinance would not result in any new significant impacts, nor does it substantially increase the severity of previously identified impacts. Accordingly, this Addendum supplements and incorporates the 2010 General Plan EIR by reference, and demonstrates the County need not prepare a subsequent or supplemental EIR pursuant to CEQA Guidelines Sections 15162 or 15163.

Project Description

This section describes the project location, project description, and the 2010 General Plan EIR project description.

1. Project Title

Point of Use/Point of Entry Ordinance Amendments

2. Lead Agency Name and Address

County of Monterey Environmental Health Bureau
1270 Natividad Road
Salinas, California 93906

3. Contact Person and Phone Number

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4. Project Location

The project consists of the implementation of an amended ordinance that would apply to properties on private wells and to lots in all local small, State small, and public water systems in the unincorporated area of Monterey County. Figure 1 shows the locations of these water systems and the planning areas of Monterey County. Figure 2 shows water systems with “Subject Lots,” where some development facilitated by the project is anticipated to occur.

5. General Plan Designation

The amended ordinance would apply to properties on private wells and to lots in all local small, State small, and public water systems in the unincorporated area of Monterey County, which have varying land use designations. The general plan land use designations of water systems where some development is anticipated to occur as a result of the project are shown in Table 2.

6. Zoning

The amended ordinance would apply to all local small, State small, and public water systems in unincorporated Monterey County, which have varying zoning districts. The zoning districts of water systems where development is anticipated to occur as a result of the project are shown in Table 2.

Figure 1 Local Small, State Small, and Public Water Systems in Monterey County

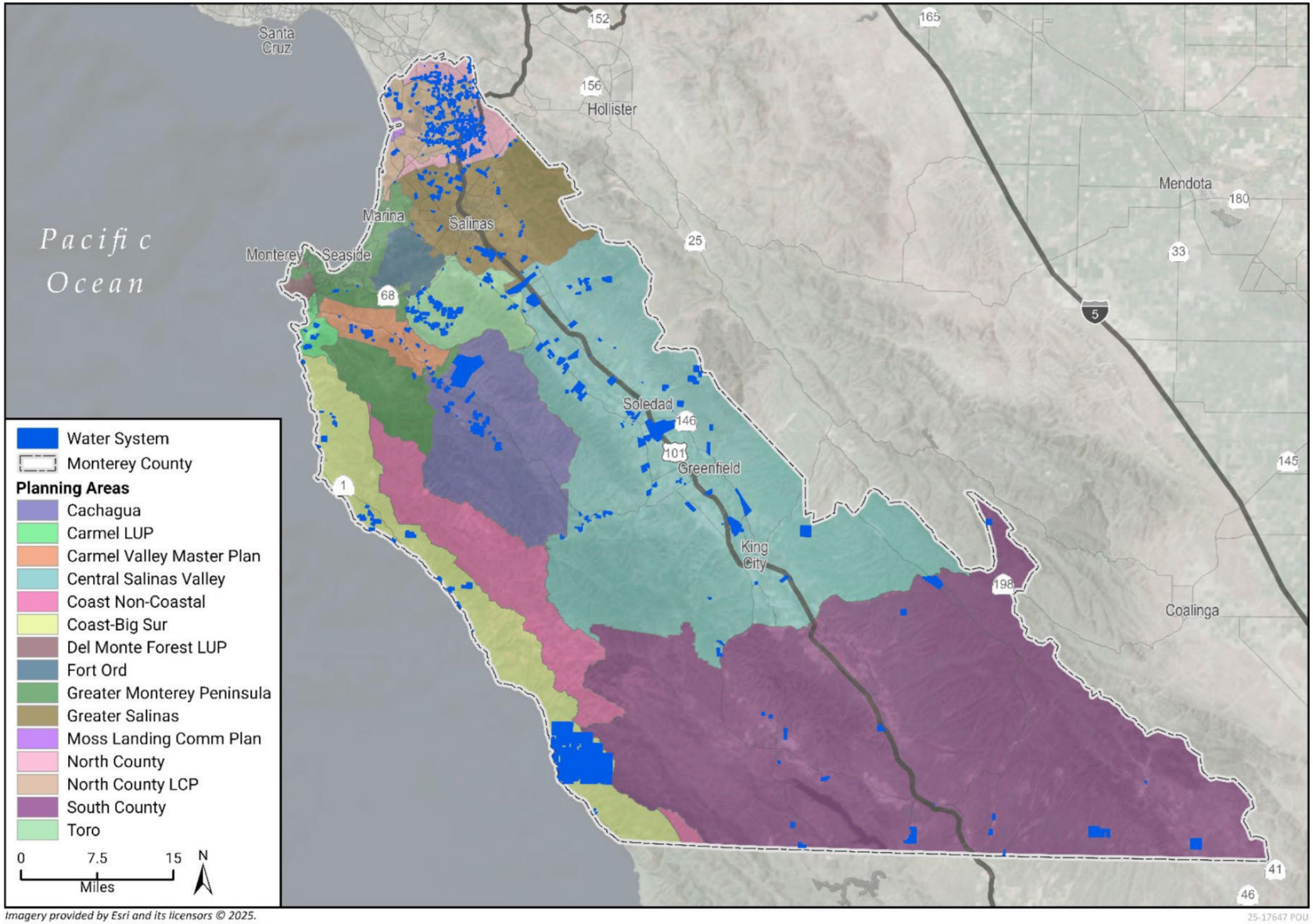
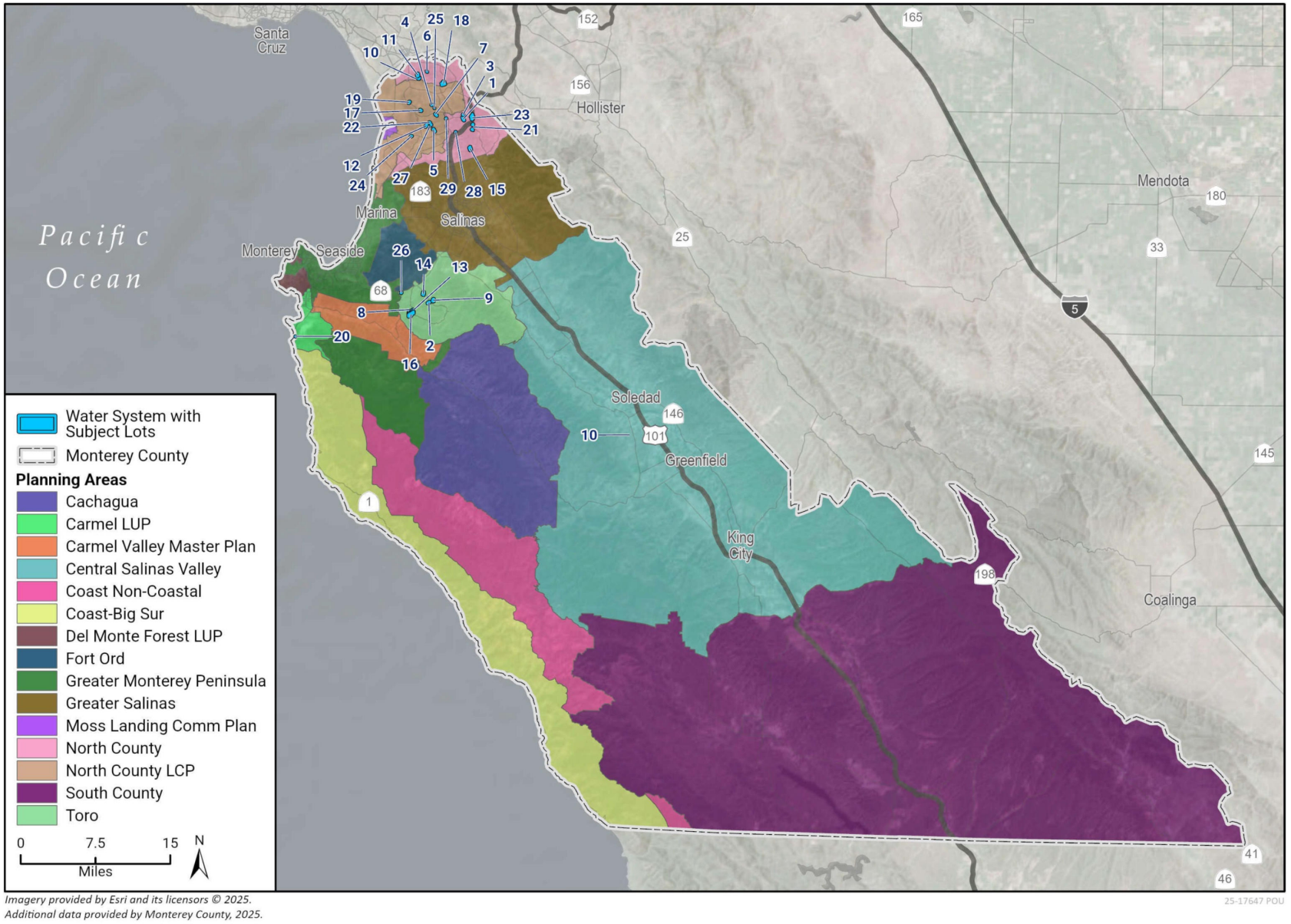


Figure 2 Water Systems with Subject Lots



7. Project Background

Water Systems, Regulations, and Compliance

The County of Monterey Environmental Health Bureau (EHB) regulates local small and State small water systems, including local small water systems with two to four service connections and State small water systems with five to 14 service connections. There are also public water systems, with 15 to 199 connections, that are no longer regulated by EHB but are still subject to the project considered herein. These water systems are drinking water well systems that typically serve multiple homes or parcels. The systems must comply with primary drinking water standards as established by Title 22 of the California Code of Regulations, incorporated by reference in Chapter 15.04 (Section 15.04.110) of the Monterey County Code.

Currently, many local small, State small, and public water systems in Monterey County are unable to meet drinking water standards due to contamination from substances such as nitrate, arsenic, fluoride, cadmium, hexavalent chromium, and 1,2,3-Trichloropropane. Many water systems in Monterey County are out of compliance for primary drinking water standards and maximum contaminant levels (MCLs), which poses public health risks. A water system or private well is out of compliance if it exceeds any of the following MCLs:[1]

- 0.005 micrograms per liter (µg/L) of 1,2,3-Trichloropropane (TCP)
- 5 µg/L of cadmium
- 10 µg/L of arsenic
- 10 µg/L of hexavalent chromium
- 2,000 µg/L of fluoride; and/or
- 10,000 µg/L of nitrate

Prior to passage of the Ordinance considered in this Addendum, options for water systems to comply with MCLs included consolidation with a neighboring compliant water system, drilling a new well, or installation of a centralized treatment system on an existing well. These compliance pathways are often infeasible due to geographic, technical, or financial constraints. If neighboring water systems are also noncompliant, water systems cannot be consolidated for compliance, meaning that drilling a new well may be both physically and financially difficult. Centralized treatment systems, in which a shared water treatment facility treats an entire water system from a single point typically at the water's source, are often complex and expensive. Further, because the entire water system with a centralized treatment system must comply with MCLs before a new water connection is added, it is often practically prohibitive to both propose development and add a new connection to the system.

To address these constraints, the Monterey County Board of Supervisors adopted Ordinance No. 5310 (Ordinance) on June 18, 2019. The Ordinance amended Chapter 15.04 and enacted Chapter 15.06 of the Monterey County Code to address point of entry ("POE") and point of use ("POU") water treatment when water supply does not meet primary drinking water standards. The Ordinance would allow treatment of water quality at the POU (such as a faucet) or POE (such as the entrance to a house) for existing non-compliant water systems, where previously only centralized treatment for these water systems (i.e., at the source) was allowed. The Ordinance would also enable building permit requirements to be met for water quality for individual vacant lots within non-compliant water systems and individual lots not within water systems if POU or POE water treatment were installed, and certain requirements were met. The Ordinance was modeled after State regulations that apply to public water systems with more than 14 connections.

[1] State Water Resources Control Board. 2025. MCLs, DLRs, and PHGs for Regulated Drinking Water Contaminants. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/mclreview/mcls_dlrs_phgs.pdf (accessed January 2026).

Environmental Review and Ordinance Suspension

In June 2019, the County determined that adoption of the Ordinance was categorically exempt from CEQA. The State regulations, which the Ordinance was modeled after, were also adopted in reliance upon certain categorical exemptions under CEQA. After adoption of the Ordinance, concerns were raised regarding the validity of the Ordinance on a variety of grounds, including insufficient CEQA review. These concerns included assertions that the Ordinance could be growth-inducing, in that POU or POE water treatment devices would remove a barrier to development, ultimately facilitating the development of vacant lots within local small, State small, and public water systems and development on individual lots served by wells that do not meet water quality standards. Based on these considerations, questions were raised as to whether reliance on a categorical exemption was appropriate.

To provide time to further evaluate the Ordinance, the Board of Supervisors adopted a subsequent ordinance on August 27, 2019 to suspend portions of the Ordinance (hereinafter referred to as the "Suspended Sections") until December 11, 2019. On December 10, 2019, the Board of Supervisors adopted an ordinance to extend this suspension until further action of the Board. The Suspended Sections would have governed use of POU and POE water treatment devices on individual wells that serve individual lots that are not within water systems where the well water does not meet drinking water standards. POU or POE water treatment devices on these types of lots (single lot, individual well) have been approved by EHB in recent years if certain requirements are met; the Suspended Sections would have codified this practice. The sections in the Ordinance pertaining to small public water systems (15 or more connections) remained. They went into effect because those systems are subject to existing State law and regulations that govern the use of POU or POE water treatment devices.

On November 28, 2023, the Board of Supervisors adopted Ordinance 23-020, which reinstated a portion of the Suspended Sections that allows POU and POE treatment on properties with active service connections in local small and state small water systems. This action is different from the Ordinance considered in this Addendum, as it applies to active service connections only, and does not allow the use of POU or POE treatment to result in new development. EHB now proposes to further amend the Ordinance to allow the use of POU and POE on vacant legal lots of record and/or ADUs within water systems that are out of compliance with water quality standards. As part of the County's efforts to resolve the issues raised and to ensure appropriate environmental review, the County has retained a consultant to conduct review of the Ordinance pursuant to CEQA.

8. Description of Project

Reinstated Ordinance

The "project" considered in this Addendum consists of adoption and implementation of the amended and reinstated Ordinance, which would allow the use of POU and POE water treatment devices non-compliant properties on private wells and to lots in all local small, State small, and public water systems in the unincorporated area of Monterey County. The proposed amendments to the Ordinance are shown in Appendix A.

The project would potentially increase the number of parcels where POU or POE water treatment may be used, and could increase buildout compared to baseline growth. Pursuant to the settlement agreement, EHB has evaluated potential growth that could be made possible by the reinstated Ordinance in this Addendum. The following sections discuss how the physical extent of potential buildout facilitated by the project was estimated.

Potential Buildout Facilitated by the Reinstated Ordinance

Determination of Subject Lots

Parcels which may not otherwise be feasibly or affordably developed without adoption of the Ordinance are referred to "Subject Lots" in this Addendum. Subject Lots are located in water systems that are out of compliance with MCLs, as described and listed above in "Water Systems, Regulations, and Compliance." To estimate the number of Subject Lots where development facilitated by the Ordinance would occur, potential development scenarios were identified, as the Ordinance would allow multiple pathways for local small, State small, and public water systems to achieve water quality compliance. These development scenarios are intended to capture a comprehensive range of scenarios in which development could be facilitated by the Ordinance; however, there could be unique situations not identified herein.

Development Scenarios

Development Scenario 1 Use of POU or POE water treatment devices to achieve compliance for an existing water system with no inactive connections

Development Scenario 2 Approval of development using POU or POE water treatment devices within an existing water system with inactive connections. This includes the following types of development:

- An individual lot within a water system (provided the water system of which the individual lot is a member is unwilling to install central treatment)
- An accessory dwelling unit (ADU)[2] that relies on a shared well as part of a water system

Development Scenario 3 Approval of development of an individual lot served by a private well where water quality does not meet the primary drinking water standards using POU or POE water treatment devices

Development Scenario 4 Approval of development of an ADU on an individual lot with a private well (not part of a water system) where water quality does not meet the primary drinking water standards using POU or POE water treatment devices

Development Scenario 5 Approval of development of a subdivision using POU or POE water treatment devices on a private individual well on each lot

Development Scenario 6 Approval of development on a vacant lot, or developed lot(s) and other neighboring vacant lot(s), that decide to come together to create a new water system or development of a neighboring vacant lot that joins an existing water system

Growth-Inducing Development Scenarios

The following section identifies which development scenarios have the potential to induce growth compared to baseline conditions.

Prior to approval of the Ordinance, under Development Scenario 1, the only way an existing local or State water system with no inactive connections could come into compliance was using centralized treatment, which is often cost prohibitive. With reinstatement of the Ordinance, under Development Scenario 1, non-compliant systems could utilize POU or POE water treatment devices, instead of a centralized system . This portion of the Ordinance was reinstated in 2023 through Ordinance 23-020, which allows POU and

[2] "Accessory dwelling unit" is defined by the Monterey County Code Section 21.06.372 as "a permanent residence, secondary to an existing main dwelling, which provides complete independent living facilities for one or more persons. It shall include permanent provision for living, sleeping, eating, cooking, and sanitation on the same parcel where the single-family dwelling is situated."

POE treatment on properties with active service connections in local small and state small water systems. Therefore, since this development is already allowed, this is not considered a change-over-baseline and **there is no further growth potential under Development Scenario 1** with reinstatement of the Ordinance.

Similar to Development Scenario 1, prior to approval of the Ordinance under Development Scenario 2, the only way a water system could be approved was using centralized treatment. Further, under Development Scenario 2, if an individual lot was within a water system that was out of compliance, under existing conditions the County would require the entire water system to become compliant using centralized treatment before any inactive connections could be activated. It is important to note, this scenario also includes approval of an ADU using an available inactive connection that relies on a shared well and is part of a water system, since approvals of ADUs are treated as an individual connection by EHB (please see Development Scenario 4 below for additional discussion of ADUs). With reinstatement of the Ordinance, under Development Scenario 2, an out of compliance water system with inactive connections would be able to utilize POU or POE water treatment devices, instead of a centralized treatment. Therefore, reinstatement of the Ordinance would be considered a change-over-baseline and, since there are inactive connections, a potential scenario where development could occur. In other words, if an inactive connection or a vacant lot (including one with an ADU connection) is served by a non-compliant water system, reinstating the Ordinance would allow these previously undevelopable lots to potentially be developed using POU or POE water treatment devices. As stated above, centralized treatment is more costly and practically prohibitive than POU or POE water treatment devices. Therefore, this change-over-baseline under **Development Scenario 2 can be considered potentially growth-inducing** as reinstatement of the Ordinance would remove an existing barrier to growth.

Development Scenario 3 is similar to Development Scenario 2, except that the individual lot would connect to a well (not a water system) that does not meet water quality standards. However, Development Scenario 3 is different than Development Scenario 2 since previously the EHB would approve a POU or POE water treatment device on a lot with an individual well if a deed restriction was recorded. Since the Ordinance was suspended, EHB has required centralized treatment for new development on private wells. Reinstatement of the Ordinance would reinstate the practice of allowing POU or POE water treatment devices for new development on private wells. As stated above, centralized treatment is more costly and practically prohibitive than POU or POE water treatment devices. Therefore, this change-over-baseline under **Development Scenario 3 can be considered potentially growth-inducing** as reinstatement of the Ordinance would remove an existing barrier to growth.

Development Scenario 4 pertains specifically to development of ADUs on an individual well where water quality does not meet the primary drinking water standards. Under existing conditions, an ADU is evaluated by EHB as if it is an individual connection, requiring water quality testing and, if necessary, centralized treatment. With reinstatement of the Ordinance, an ADU on an individual lot with a private well could be approved by EHB using POU or POE water treatment devices, representing a change-over-baseline. In both instances (existing conditions and reinstatement of the Ordinance), the addition of the ADU results in the creation of a water system needing a water system permit (unless the owner agrees to a deed restriction, which would then make the ADU fall under Development Scenario 3).

It is important to acknowledge that County Ordinance Nos. 5341 and 5343,[3] adopted by the County Board of Supervisors in September 2020, implement State law (Government Code Section 65852.2) that reduces local government discretion over approval of ADUs and streamlines approval by requiring a ministerial process. Previously, ADUs on a private well in Monterey County were not allowed to be approved using POU or POE if the well exceeded water quality standards; instead, centralized treatment was required. However, in aligning with State ADU law, EHB will likely be required to allow the development of an ADU regardless of the type of treatment system proposed. This, combined with other ADU streamlining provisions, may result in the production of more ADUs Countywide. While this potential

[3] As of the drafting of this IS-MND, the coastal ADU ordinance (Ordinance No. 5343) is pending certification by Coastal Commission and is not in effect. If a local ordinance is not adopted, per Government Code section 65852.2, state standards apply in conjunction with, in the coastal zone, the County's certified Local Coastal Program.

increase in ADUs would be facilitated primarily by State law, implemented via County Ordinance Nos. 5343 and 5341, this analysis will conservatively assume that ADU development would be made equally possible by reinstatement of the Ordinance. Accordingly, **Development Scenario 4 has growth-inducing potential.**

For Development Scenario 5, which pertains to development of subdivisions, Section 15.06.040.E of the Ordinance prohibits approval of a new subdivision using POU or POE for the water system if the water system includes 2 to 14 connections and requires treatment. Therefore, POU or POE water treatment devices cannot be relied upon for treatment, even with reinstatement of the Ordinance. EHB has not historically allowed the use of POU or POE water treatment devices as the basis of approval of new subdivisions, with one exception. In that exception, the subdivision was approved using POU or POE water treatment devices, where there were existing private wells for existing development on each of the lots to be created by the subdivision. It is EHB's intent to eliminate the possibility of using POU or POE water treatment in future subdivisions on private wells, and to only allow new subdivisions to use centralized treatment if water treatment is necessary. Therefore, reinstatement of the Ordinance alone under **Development Scenario 5 would not be considered growth-inducing** and this development scenario is not analyzed further.

Lastly, under Development Scenario 6, lots – developed, vacant, or a combination of both – could choose to utilize a shared private well which would result in the creation of a new water system. Development Scenario 6 includes the possibility of a neighboring vacant lot joining an existing water system. Under existing conditions, development of the lot in this scenario would only be allowed with centralized treatment of a water quality issue, but with reinstatement of the Ordinance, this type of development could potentially be allowed with POU or POE water treatment devices. Therefore, this type of development would represent a change-over-baseline and a potential scenario where growth could occur. **Development Scenario 6 is considered growth-inducing.**

The potential for each scenario to result in a change-over-baseline and/or be growth inducing is summarized in Table 1 below. As noted therein, Development Scenarios 1 and 3 would not cause a change-over-baseline and/or be growth inducing. **Development Scenarios 2, 5, 4, and 6 could cause a change-over-baseline and would potentially be growth inducing**. As such, these three scenarios may result in a Subject Lot for the purpose of this analysis.

Table 1 Summary of Baseline and Development Scenario Assumptions

Development Scenario	Existing Conditions	Passage of Suspended Sections	Change-Over-Baseline?	Potentially Growth Inducing?
1: Use of POU or POE water treatment devices to achieve compliance for an existing water system with no inactive connections	Already allowed by Ordinance 23-020.	No new changes, would remain allowed.	No	No, because there are no inactive connections.
2: Approval of development using POU or POE water treatment devices within an existing water system with inactive connections. This includes the following types of development: • An individual lot within a water system (provided the water system of which the individual lot is a member is unwilling to install central treatment) • An accessory dwelling unit (ADU) that relies on a shared well as part of a water system	Not allowed, centralized treatment required if system is out of compliance.	Allowed, the development could be approved using POU or POE water treatment devices.	Yes	**Yes**
3: Approval of development of an individual lot served by a private well where water quality does not meet the primary drinking water standards using POU or POE water treatment devices	Not allowed; centralized treatment required if system is out of compliance.	Allowed, POU or POE water treatment devices may be used for approval pursuant the MCC.	Yes	**Yes**
4: Approval of development of an ADU on an individual lot with a private well (not part of a water system) where water quality does not meet the primary drinking water standards using POU or POE water treatment devices	Not allowed, centralized treatment required if system is out of compliance.	Allowed, an ADU within a system could be approved using POU or POE water treatment devices.	Yes	**Yes**
5: Approval of development of a subdivision using POU or POE water treatment devices on a private individual well on each lot	Not supported for new undeveloped lots.	Not allowed, POU or POE water treatment devices may not be used for approval for new development.	No	No, because subdivisions would only be allowed to use centralized treatment if water treatment is necessary.
6: Approval of development on a vacant lot, or developed lot(s) and other neighboring vacant lot(s), that decide to come together to create a new water system or development of a neighboring vacant lot that joins an existing water system	Not allowed, centralized treatment required if system is out of compliance.	Allowed, POU or POE water treatment devices may be used for approval.	Yes	**Yes**

Buildout Estimation Methodology

This section describes the methodology used to estimate the potential future buildout of Subject Lots in the County under the project (i.e., implementing the Ordinance). As stated above, Development Scenarios 2, 4, and 6 represent a change-over-baseline, which could result in additional development throughout the County due to reinstatement of the Ordinance.

Subject Lots – Development Scenarios 2 and 6

To quantify buildout of Development Scenario 2, vacant lots within an out-of-compliance water system were quantified using County-provided GIS data which was input into an online mapping tool. This final online mapping tool provided a product by which water systems could be viewed and filtered using their compliance, inactive connection, and zoning status.

To visualize the individual lots that may be built under Development Scenario 2, water systems were filtered for those systems which had a compliance issue and had greater than zero inactive connections. Then each of these water systems were examined individually to understand the development potential and whether there was indeed a vacant lot with an inactive connection that may be built using POU or POE water treatment. To provide a conservative analysis, a lot was considered to be vacant if the water system ID had either an inactive connection or a vacant lot. In addition, vacant lots were crossed checked against the Monterey County zoning map to ensure that they were zoned for residential development.

Only under Development Scenario 2 was a quantitative approach feasible to estimate the potential future buildout of Subject Lots in the County under the project. Under Development Scenario 6, there are several variables that affect approval of these types of development, such as appropriate zoning, location of vacant lots in relation to zoning, as well as individual well capacity and cost of multiple wells. Isolating those variables to predict how changing one variable (passage of the Suspended Sections of the Ordinance) would affect growth potential in the County would be conjectural. As a result, a qualitative analysis is provided below for these scenarios.

Wells on Individual Lots – Development Scenario 3

As outlined above, there would be a change-over-baseline for the approval of individual lots using domestic wells (Development Scenario 3). To quantify the development potential under this scenario, historic permit data was analyzed. Monterey County's permit tracking software (Accela) was queried to quantify the number of individual lots using domestic wells and ADUs that have been approved.

Accessory Dwelling Units – Development Scenario 4

To conservatively estimate and analyze the maximum buildout scenario that could be attributed to the project, the growth projections herein assume that the development of ADUs within out-of-compliance water systems would be solely facilitated by the Ordinance, and not by State law and County Ordinances Nos. 5341 and 5343. To estimate the number of ADUs that could be facilitated in out-of-compliance water systems by the Ordinance, the number of ADU permit applications received by Monterey County Housing and Community Development (HCD) since 2018 was reviewed. For purposes of this analysis, it is assumed that each permit application resulted in the construction of an ADU. However, the application data provided by Monterey County HCD does not indicate whether the associated ADUs were ultimately approved or built. As a result, this analysis may overestimate actual ADU development, therefore providing a conservative analysis of ADU buildout.

2018 was selected as a baseline year as this is when several impactful ADU reforms occurred at the state level. Reforms passed in 2018 include but are not limited to Senate Bill 229, which strengthened state oversight of local ADU ordinances and clarified standards, and Assembly Bill 494, which made several changes to ADU regulations to further streamline approvals. Since 2018, then, County ADU applications were only possible for parcels in compliant local small, State small, or public water systems. The Ordinance would facilitate the development of ADUs within out-of-compliance water systems, where they

previously would have been more difficult to develop; therefore, the rate of ADU development across in-compliance water systems would generally represent the rate of ADU development within out-of-compliance systems, as POU or POE treatment would make it generally equally feasible to develop ADUs in water systems regardless of compliance status. The rate of ADU applications in other water systems was applied to the number of out-of-compliance water systems to estimate the rate of ADU development facilitated by the Ordinance.

The annual rate of ADU applications within in-compliance water systems since 2018 has been variable. For example, there were only four applications for ADUs for parcels within in-compliance systems between January 1, 2018 and December 31, 2020, and 16 applications between January 1, 2021 and December 31, 2023. The number of ADU permit applications within in-compliance systems peaked in 2025, with 20 applications submitted between January 1 and December 31. This increased 2025 rate may be associated with updates to the California Building Code that took effect on January 1, 2026. It is likely that some ADU applicants sought to apply for permits before new, more stringent development standards became effective. Although 2025 is likely an outlier, the County wishes the analysis to be conservative. Accordingly, this analysis will use the rate of 20 ADU applications per year to provide a conservative estimate of the number of ADUs that could be facilitated by the reinstated Ordinance.

Although the reinstated Ordinance would facilitate ADU development within compliant water systems, actual construction of ADUs would continue to be constrained by other factors. As discussed above, there is a gap between ADU applications filed and actual finalized, issued ADU permits. Applicants sometimes begin the ADU permitting process of but later abandon their plans once they discover the high costs of construction. In particular, the cost of installing new or upsized septic systems to accommodate proposed ADUs is often high enough to deter potential ADU applicants. Consequently, the rate of 20 ADUs per year is unlikely to be realized, as costs and other constraints would likely limit the actual ADUs that are ultimately built. .

The County intends for this Addendum to analyze direct and reasonably foreseeable indirect physical changes in the environment that may be caused by the project, while also analyzing a reasonable buildout scenario based on evidence. The County intends to avoid speculation. Accordingly, it would be unrealistic to assume that the project would result in the development of 20 ADUs per year indefinitely, especially given that this rate is conservative and unlikely to reflect reality and absent evidence . that market conditions, infrastructure capacity, and applicant behavior would sustain that rate long-term. Therefore, this analysis will use a ten-year horizon to estimate ADU development facilitated by the Ordinance, and this Addendum will consider a total of 200 ADUs. A ten-year horizon is consistent with programmatic planning documents, such as housing elements or general plans, which typically evaluate program-level effects across eight to 20 years. Therefore, this analysis shall use a ten-year planning horizon to evaluate the potential development of 200 ADUs throughout out-of-compliance water systems.

Buildout Estimation Results

Subject Lots – Development Scenarios 2 and 6

As outlined above, to understand the buildout potential for local small, State small, and public water systems with inactive connections or vacant lots (Development Scenario 2), County-provided GIS data was used to view existing vacant lots within out-of-compliance water systems throughout the County. The results of the mapping analysis are provided above in Figure 2 and below in Table 2.[4] The results indicate that there are 44 vacant parcels within a water system that is out of compliance. As shown in the figure, vacant lots are primarily congregated in the Toro Planning Area as well as the North County Planning Area, the North County Coastal Land Use Plan area, and the Central Salinas Valley Planning Area. Further details on these parcels are outlined in Table 2.

Forty-one of the vacant lots are residentially zoned, either as Low Density Residential (LDR) or Rural Density Residential (RDR). Therefore, development of one unit per lot is typically allowed with a

[4] Note specific water system information has been omitted in order to respect the privacy of the owners of the water system.

ministerial permit unless some aspect of the project triggers a discretionary permit (e.g., zoning overlay, tree removal, building on slopes). The three remaining vacant lots are zoned as Resource Conservation (RC), which also allow one single family dwelling unit per lot. The LDR, RDR, and RC zoning districts all allow one secondary guesthouse per lot, with development standards established in Monterey County Code Section 21.64.020.

Of the 44 vacant lots, 17 are located within water systems that are out of compliance for hexavalent chromium. Three lots are located within water systems out of compliance for nitrate, one is located within a water system out of compliance for fluoride, and nine are located within water systems that are out of compliance for arsenic.

Under Development Scenario 6, multiple landowners would need to come together to connect to an existing private well and create a new water system or agree to allow a new lot into the existing water system. It is highly unlikely that the owner of a private well would be willing to give adjacent landowners permissions to connect to their well, as this would escalate the well into a water system with accompanying regulations. Further, the adjacent landowner could drill their own well, if the capacity exists, instead of using the single well. This would likely be preferable to a new water system and would move this type of development to Development Scenario 3. As a result, although this scenario is possible and could potentially result in additional growth throughout the County, a combination of highly unlikely conditions would be required. As a result, it is not expected that the amount of additional approvals under Development Scenario 6 would be substantial. Therefore, the number of Subject Lots made possible by Development Scenario 6 is expected to be very minimal.

Wells on Individual Lots – Development Scenario 3

Between 2010 and 2020, ten single family residences on domestic wells in individual lots have been approved using POU or POE treatment devices.[5] More recent data is not available because centralized treatment has been required for development occurring under this scenario since suspension of the Ordinance at the end of 2019. Ten units on domestic wells in individual lots between 2010 and 2020 represent a development rate of one residence per year under Development Scenario 3. One residence per year is a reasonable development rate as it reflects observed development of residences on domestic wells in individual lots. Further, as discussed under "Accessory Dwelling Units – Development Scenario 4" in *Buildout Estimation Methodology* above, this analysis will use a ten-year planning horizon. Accordingly, it is estimated that approximately 10 residences would be facilitated under Development Scenario 3.

[5] Fowler, Nicole. Email communication regarding buildout facilitated by the Ordinance, August 20, 2020.

Table 2 Characteristics of Subject Lots

Water System Map Number	Water System ID	Compliance Issue[1]	General Plan Land Use Designation[2]	Zoning Designation[2]	Number of Vacant Lots[1]
1	2700778	hexavalent chromium	Resource Conservation	RC – Resource Conservation	6
2	2708809	arsenic	Residential – Low Density	LDR – Low Density Residential	2
3	2701424	hexavalent chromium	Resource Conservation	RC – Resource Conservation	1
4	2701519	hexavalent chromium	Residential – Rural Density (Coastal Zone)	RDR – Rural Density Residential	1
5	2702117	hexavalent chromium	None	LDR – Low Density Residential	1
6	2702414	hexavalent chromium	Residential – Low Density	LDR – Low Density Residential	1
7	2701520	nitrate	None	RDR – Rural Density Residential	1
8	2701743	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
9	2702113	arsenic	Residential – Low Density	LDR – Low Density Residential	3
10	2701796	hexavalent chromium	Residential – Low Density	RDR – Rural Density Residential	2
11	2702469	hexavalent chromium	Residential – Low Density	LDR – Low Density Residential	2
12	2700801	hexavalent chromium	None	LDR – Low Density Residential	1
13	2701412	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
14	2701450	arsenic	Residential – Low Density	LDR – Low Density Residential	1
15	2702313	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
16	2702445	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
17	2702676	hexavalent chromium	None	RDR – Rural Density Residential	1
18	2701885	hexavalent chromium	Residential – Rural Density	RDR – Rural Density Residential	1
19	2701618	hexavalent chromium	None	RDR – Rural Density Residential	1
20	2702809	fluoride	None	LDR – Low Density Residential	2

Water System Map Number	Water System ID	Compliance Issue[1]	General Plan Land Use Designation[2]	Zoning Designation[2]	Number of Vacant Lots[1]
21	2702007	hexavalent chromium	Resource Conservation	RC – Resource Conservation	3
22	2700674	hexavalent chromium	None	RDR – Rural Density Residential	2
23	2700713	nitrate	Resource Conservation, Residential – Rural Density	RDR – Rural Density Residential	2
24	2700548	hexavalent chromium	None	RDR – Rural Density Residential	1
25	2700594	hexavalent chromium	None	RDR – Rural Density Residential	1
26	2700612	arsenic	Residential – Low Density	LDR – Low Density Residential	1
27	2700624	hexavalent chromium	None	LDR – Low Density Residential	1
28	2701926	arsenic	Residential – Low Density	LDR – Low Density Residential	1
29	2702608	nitrate, hexavalent chromium	Residential – Low Density	LDR – Low Density Residential	1
Total Vacant Lots					**44**

Sources:

1. Environmental Health Bureau Local Small, State Small, and Public Water System Compliance data, updated in 2026.
2. County of Monterey, 2026. Zoning GIS database. https://montereyco.maps.arcgis.com/apps/InformationLookup/index.html?appid=1dce0909198142128bc57aee61c811ea

Accessory Dwelling Units – Development Scenario 4

Based on historic permit application data, the County has received 68 ADU applications for parcels located within an in-compliance water system since 2018, and 20 of these were received in 2025. This growth projection will use the number of ADU permit applications for parcels within in-compliance systems from 2025 to provide a conservative analysis, as discussed under "Accessory Dwelling Units – Development Scenario 4" in "Buildout Estimation Methodology." Therefore, it is assumed that approximately 20 ADUs per year would be facilitated by the Ordinance over 10 years, for a total of 200 ADUs.

Other Development Scenarios

Development Scenario 1 is already allowed by Ordinance 23-020, and therefore it is not considered further. Development Scenario 5 (subdivisions) would not induce development because the revised Ordinance specifically prohibits approval of new subdivisions using POU or POE water treatment. New subdivisions would be required to use centralized treatment if water treatment is necessary.

Buildout Estimation Summary

Buildout facilitated by the reinstated Ordinance is summarized in Table 3. In total, the project could facilitate development of approximately 54 new single-family units, plus up to 20 ADUs per year for approximately 10 years.

Table 3 Estimated Project Buildout

Development Scenario	Number of Potential Future Lots/Units	Considered Subject Lots
Local and State Small Water Systems with active connections (Development Scenario 1)	None, no potential for growth because active connections are already developed	Not applicable
Local and State Small Water Systems with inactive connections (Development Scenario 2)	44 single-family units	Yes
Individual Wells (Development Scenario 3)	1 per year for 10 years; 10 single-family units	No
ADUs on private well (Development Scenario 4)	20 per year for 10 years; 200 ADUs	Yes
Subdivisions (Development Scenario 5)	None, will not be allowed	No
Creation of a New System (Development Scenario 6)[1]	Unknown, but not expected to be substantial	Yes

9. Other Public Agencies Whose Approval is Required

The County of Monterey is the lead agency for this project. The Monterey County Board of Supervisors would have to approve the amended Ordinance. There are no other public agencies with approval power over the project.

10. Existing Environmental Documentation

2010 General Plan

State law mandates that each city and county in California adopt "a comprehensive, long-term general plan," the purpose of which is to plan for important community issues such as new growth, housing

needs, and environmental protection. Furthermore, the General Plan is used to project future demand for services such as sewer, water, roadways, parks, and emergency services.

On October 26, 2010, the County adopted the 2010 General Plan for the inland unincorporated area and certified the associated EIR as the lead agency. The Monterey County Board of Supervisors and Planning Commission rely on the General Plan as the primary framework for land use decisions and the provision of public facilities such as roads, parks, and fire stations. The 2010 General Plan also guides policies related to open space and habitat conservation, arts and recreation programming, and community character.

State law requires that every General Plan, at a minimum, address certain subject categories (called "elements"), which include land use, circulation, housing, conservation of natural resources, environmental justice, open space, noise, and safety. A General Plan may also address other subjects that are of importance to the community" future, such as sustainability, community design, and public art. The 2010 General Plan includes the following elements:

- Land Use Element
- Conservation and Open Space Element
- Safety Element
- Public Services Element
- Agriculture Element
- Housing Element
- Area/Master Plans
- Economic Development Element
- Circulation Element

2010 General Plan EIR

The 2010 General Plan EIR addressed the potential environmental effects of the planned buildout of the County through the year 2030, focusing in depth on 16 environmental issue areas. The 2010 General Plan EIR concluded that implementation of the 2010 General Plan would result in levels of environmental impacts as detailed in Table 4. Mitigation measures were incorporated into the 2010 General Plan EIR to reduce potential impacts from development under the 2010 General Plan. Although the 2010 Monterey County General Plan EIR did not directly analyze buildout of the coastal zones of the County, it did analyze cumulative buildout Countywide, including in coastal areas.

Table 4 Summary of Areas of Potential Impact under the 2010 General Plan EIR

Issue Area	Level of Significance After Mitigation	Mitigation in the General Plan EIR
Aesthetics, Light and Glare	Significant and Unavoidable	None
Agriculture Resources	Significant and Unavoidable	None
Air Quality	Significant and Unavoidable	AQ-1 through AQ-9
Biological Resources	Less than significant	BIO-1.1 through BIO-1.5, BIO-2.1 through BIO-2.3 and BIO-3.1 through BIO-3.2
Cultural Resources	Less than significant	None
Climate Change	Significant and Unavoidable	CC-1 through CC-5, BIO-1.9, CC-12 and CC-13
Geology, Soils and Seismicity	Less than significant	BIO-2.1

Issue Area	Level of Significance After Mitigation	Mitigation in the General Plan EIR
Hazards and Hazardous Materials	Less than significant	None
Water Resources	Significant and Unavoidable	WR-1 and WR-2
Land Use	Less than significant	None
Mineral Resources	Less than significant	None
Noise	Less than significant	None
Population and Housing	Significant and Unavoidable	None
Public Facilities and Services	Less than significant	None
Park and Recreation	Less than significant	PAR-1
Public Services and Utilities[1]	Significant and Unavoidable	PS-1 and PS-2
Transportation	Less than significant	TRAN -1E, TRAN-5A and TRAN-2B

[1] Public utilities and infrastructure was incorporated into the public facilities and services section of the 2010 General Plan EIR.

As summarized in Table 4, the County determined that implementation of the 2010 General Plan would result in significant and unavoidable impacts to aesthetics, light, and glare; agricultural resources; air quality; climate change; water resources; population and housing; and public services and utilities. On October 26, 2010, the Monterey County Board of Supervisors adopted CEQA Findings of Fact and a Statement of Overriding Considerations, which concluded that the updated General Plan was legally required, environmentally preferable to existing conditions, essential for long-term agricultural and community protection, and provided Countywide economic, social, and planning benefits that outweighed its environmental impacts.[6]

The 2010 General Plan was amended in 2013 to, among other amendments, update General Plan Policy PS-3.1 (Long Term Sustainable Water Supply), PS-3.3 (New Domestic Wells), and PS-3.4 (New High-Capacity Wells). Policy PS-3.1 was amended to require a five-year study to evaluate groundwater elevations and seawater intrusion relative to total water demand for existing and projected future uses under the General Plan through 2030 within the Monterey County Water Resources Agency Zone 2C assessment district area. Policy PS-3.3 was amended to change the description of PS-3.3a through PS-3.3g as “factors” for development of criteria instead of “criteria subjects”. Lastly, both Policy PS-3.3 and PS-3.4 were amended to add the phrase “additional extractions or diversion of water.”

Two addenda to the 2010 General Plan Final EIR were prepared (Addendum No. 1 and Addendum No. 2) to analyze the 2013 amendments. The addenda concluded that the proposed changes to the 2010 General Plan would not result in additional impacts or an increase in the severity of impacts.

Monterey County Local Coastal Program

Pursuant to the California Coastal Act (Public Resources Code Section 30000 et seq.), each local government within the State coastal zone must prepare a Local Coastal Program (LCP) for the portion of the coastal zone within its jurisdiction. An LCP includes a land use plan, ordinances, and actions for future projects to comply. The County’s certified LCP includes four certified Land Use Plans and Coastal Implementation Plan, which includes coastal zoning (Title 20 of the Monterey County Code) and area-specific regulations. Some of the Subject Lots fall within the North County Land Use Plan, which was certified in 1982. Since the County’s certified LCP is applicable in the unincorporated coastal zone, development of these Subject Lots would require a discretionary coastal permit. Therefore, all future

[6] County of Monterey, 2010. 2010 General Plan EIR Certification Exhibit EIR2, Statement of Overriding Considerations. https://www.countyofmonterey.gov/home/showpublisheddocument/46034/639124617278230000

projects located within the coastal zone would be required to conform to County's Land Use Plan and Coastal Implementation Plan.

Applicability of General Plan EIR

Most of the Subject Lots are located within the inland areas of Monterey County. Although the 2010 General Plan EIR assessed the environmental impacts associated with buildout of inland areas of the County, the cumulative impact analysis of the EIR addressed buildout of the entire County, including coastal areas. As such, even though a small number of the Subject Lots are within the coastal zone, the 2010 Monterey County General Plan EIR is considered relevant and an Addendum to the General Plan EIR is applicable to the Ordinance.

Decision not to Prepare a Subsequent EIR

Pursuant to CEQA Guidelines Section 15063, the County, as Lead Agency, prepared an Initial Study to determine whether the project may have a significant effect on the environment and to identify the appropriate form of CEQA documentation for the project. The Initial Study is included as Appendix B. The Initial Study included a preliminary evaluation of environmental effects, and addressed all environmental topic areas identified in Appendix G of the CEQA Guidelines.

Based on the results of the Initial Study, the County determined that an addendum to the previously certified 2010 General Plan EIR would be the appropriate level of CEQA review for the Ordinance amendments. As outlined in Section 15164 of the CEQA Guidelines, a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.

Future development facilitated by the amended Ordinance would undergo project specific developmental review and would be required to comply with development standards and zoning and building code regulations as required by State law and by County policy. When a specific development proposal is considered for approval, that project would be subject to adopted development standards, which include mitigation measures identified in the 2010 General Plan EIR that were incorporated as policies in the 2010 General Plan. Development of lots in the coastal zone must be consistent with Local Coastal Program policies. Most development facilitated by the Ordinance would only require ministerial permits from the County, and hence, not be subject to further environmental review. However, if future development requires a discretionary land use entitlement under County plans and regulations, a project-level environmental review would be required.

The impact analysis presented in this Addendum, informed by the Initial Study (Appendix B), demonstrates that the Ordinance amendments would not result in new or more severe significant environmental effects beyond those identified and analyzed in the 2010 General Plan EIR. The Ordinance would not involve substantial changes to the project, changes in circumstances, or the emergence of new information of substantial importance that would either create new significant impacts or substantially increase the severity of previously identified impacts. Accordingly, none of the conditions requiring preparation of a subsequent or supplemental EIR under CEQA Guidelines Section 15162 have occurred or would occur as a result of the Ordinance. Therefore, this Addendum is the appropriate level of CEQA review for the County's decision-making on the Ordinance.

Pursuant to CEQA Guidelines Section 15007(b), new requirements adopted through amendments to the Guidelines apply only to steps in the CEQA process that have not yet been undertaken as of each amendment's effective date. Section 15007(c) further provides that a CEQA document which satisfied the content requirements in effect at the time it was released for public review is not required to be revised to conform to subsequently adopted guideline amendments prior to final approval.

EIR addenda are not subject to required public review pursuant to CEQA Guidelines Section 15164(c). Accordingly, preparation of an addendum does not trigger the "public review" threshold for determining whether subsequently adopted analytical or procedural requirements apply. For this project, the Final EIR for the 2010 General Plan was certified in 2010, prior to the effectiveness of later statutory and regulatory amendments to CEQA, such as Senate Bill 743. Therefore, consistent with CEQA Guidelines Sections 15007 and 15164, those subsequent requirements do not apply to the evaluation of the Ordinance under CEQA.

Although CEQA Guidelines Section 15164(c) does not require public circulation of an EIR addendum, this Addendum is being circulated for public review as a courtesy to the public, to provide an opportunity for public comment on the Addendum, and to disclose the basis for the County's decision-making and CEQA determination for the Ordinance.

Environmental Checklist and Impacts of Proposed Changes to the 2010 General Plan EIR

This Addendum evaluates potential environmental impacts that could result from the Ordinance amendments. The analysis below provides updates where necessary to characterize potential impacts.

Appendix G of the CEQA Guidelines provides a checklist of environmental issues areas suggested for assessment in a CEQA analysis. The 2010 General Plan EIR addressed 16 of these environmental issue areas in detail. This included the following:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions/Climate Change
- Agricultural Resources
- Recreation
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation/Traffic
- Mineral Resources
- Population and Housing

To provide a thorough and conservative analysis of potential impacts associated with the Ordinance amendments, this Addendum addresses all 20 environmental issue areas suggested by Appendix G of the CEQA Guidelines, informed by the Initial Study (Appendix B) prepared for the Ordinance. This includes energy, wildfire, and tribal cultural resources. Energy and wildfire sections were not included in the 2010 General Plan EIR because they were not incorporated into CEQA at the time of adoption of the Notice of Preparation and approval of the 2010 General Plan EIR. In addition, Tribal Cultural Resources is an issue area added to the CEQA Guidelines in September 2016 pursuant to Assembly Bill (AB) 52, after certification of the 2010 General Plan EIR.

Potential environmental impacts of the Ordinance are analyzed to determine if they are consistent with the impact analysis provided in the 2010 General Plan EIR, and if additional mitigation measures are required to minimize or avoid further potential impacts. Where the following analysis identifies impacts, discussion of previously identified mitigation measures from the 2010 General Plan EIR and existing applicable policies and regulations are discussed, as relevant, with respect to mitigating potential impacts from the Ordinance.

1. Environmental Checklist

Aesthetics

Section 4.14, *Aesthetics, Light, and Glare*, of the 2010 General Plan EIR found that adoption of the 2010 General Plan would result in significant and unavoidable impacts related to visual character, light, and glare. All other impacts would be less than significant without mitigation. It further stated that individual development projects would be subject to project-specific development and planning review, including adherence to standards for community design and visual quality. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning aesthetic resources such as those that address architectural design, lighting, signage, landscaping, building setbacks, and hillside protection.

As discussed in Environmental Checklist Section 1 of the Initial Study (Appendix B), the Ordinance would have less-than-significant impacts related to adverse effects to scenic vistas, scenic resources within a state scenic highway, visual character or quality of public views, or light and glare. Accordingly, the Ordinance's potential impacts to aesthetics would not be new or more severe compared to those identified in the 2010 General Plan EIR.

Agriculture and Forestry Resources

Section 4.2, *Agriculture Resources*, of the 2010 General Plan EIR found that adoption of the 2010 General Plan would result in significant and unavoidable impacts related to the conversion of farmland to a non-agricultural use. All other impacts would be less than significant without mitigation. 2010 General Plan policies and implementation programs are in place to minimize impacts to agricultural land conversion that apply to future development. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning agricultural resources such as those that protect and preserve agricultural land.

As discussed in Environmental Checklist Section 2 of the Initial Study (Appendix B), the Ordinance would have no impacts related to the conversion of Farmland to non-agricultural use, conversion of forest land or timberland to non-forest use, conflicts with existing zoning for agricultural or forest use or a Williamson act contract, or other changes that could result in the conversion of Farmland or forest land to non-agricultural or non-forest use. Accordingly, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to agriculture and forestry resources than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of agriculture and forestry resources is required.

Air Quality

Section 4.7, *Air Quality*, of the 2010 General Plan EIR found that adoption of the 2010 General Plan would result in significant and unavoidable impacts regarding a cumulatively considerable net increase of criteria pollutants for which the region is in non-attainment. Mitigation Measures AQ-3, AQ-4, and AQ-5 would be implemented to reduce potential impacts; however, impacts would still be significant and unavoidable. In addition, the 2010 General Plan EIR determined that implementation of the 2010 General Plan would have less than significant impacts related to conflicting with applicable air quality management plans and standards. Mitigation Measures AQ-1 and AQ-2 would reduce potential impacts related to the generation of significant quantities of construction related emissions to a less than significant level. Furthermore, mitigation Measures AQ-6 and AQ-7 would reduce potential impacts related to diesel exposure health risk to a less than significant level. Mitigation Measures AQ-8 and AQ-9 would reduce potential impacts regarding odors to less than significant. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning air quality such as those that reduce air quality impacts.

As discussed in Environmental Checklist Section 3 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to conflicts with the applicable air quality plan, a cumulatively considerable net increase of criteria pollutants, exposure of sensitive receptions to substantial pollutant concentrations, or other emissions such as odors that may affect a substantial number of people. Accordingly, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to air quality than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of air quality is required.

Biological Resources

Section 4.9, *Biological Resources*, of the 2010 General Plan EIR determined that impacts to biological resources would be less than significant with mitigation incorporated for effects to sensitive animal and plant species, sensitive natural communities and habitats, and wildlife movement. Mitigation Measures BIO-1.1 through BIO-1.5, BIO-2.1 through BIO-2.3, and BIO-3.1 through BIO-3.2 would be implemented to reduce potential impacts. Impacts related to the potential loss of protected trees were determined to be less than significant. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA and other regulations concerning the protection of biological resources, including listed species, habitats, all planning resources designed to protect and conserve biological resources.

As discussed in Environmental Checklist Section 4 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts to special status species, riparian areas or other sensitive natural communities, wetlands, wildlife movement, conflicts with local ordinances protecting biological resources, or conflicts with habitat conservation plans. Accordingly, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to biological resources than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of biological resources is required.

Cultural Resources

Section 4.10, *Cultural Resources*, of the 2010 General Plan EIR determined that all impacts on cultural resources would be less than significant. The 2010 General Plan established policies for future development to reduce impacts to the greatest extent feasible. Individual development projects would be subject to project-specific development and planning review. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning the protection of cultural resources, including listed historic and archaeological resources. No mitigation measures were required.

As discussed in Environmental Checklist Section 5 of the Initial Study (Appendix B), the Ordinance would have no impacts related to substantial adverse changes in the significance of historical or archaeological resources, or disturbance of human remains. Accordingly, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to cultural resources than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of cultural resources is required.

Energy

The 2010 General Plan included a discussion of impacts related to energy pursuant to Appendix F of the *CEQA Guidelines*, which is summarized in Section 4.16, *Climate Change*, of the 2010 General Plan EIR. This section determined that impacts related to energy would be less than significant with mitigation incorporated. Mitigation Measure CC-3 would be implemented to reduce potential impacts related to energy. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations related to energy.

Environmental Checklist Section 6 of the Initial Study (Appendix B) includes an expanded discussion of energy, in accordance with the most recent version of Appendix G of the CEQA Guidelines. As discussed therein, the Ordinance would have less than significant impacts related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation, or to obstruction of a state or local plan for renewable energy or energy efficiency. Accordingly, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to energy than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of energy is required.

Geology and Soils

Section 4.4, *Geology and Soils*, of the 2010 General Plan EIR determined that impacts to geology and soils would be less than significant for adverse effects related to rupture of a known fault, strong ground shaking, seismic-related ground failure, or landslides; landslide, lateral spreading, subsidence, liquefaction, or collapse; locating development on expansive soils; tsunami, seiche, and mudflow hazards; and installing septic tanks and alternative wastewater disposal systems in expansive soils. However, potentially significant impacts were found for soil erosion and mitigation measure BIO-2.1 was incorporated to reduce impacts to less than significant. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning geology and soils. Therefore, impacts to geology and soils would be less than significant with mitigation and compliance with federal, State, and local regulations.

As discussed in Environmental Checklist Section 7 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to adverse effects involving fault rupture, unstable soil hazards, septic tanks or wastewater disposal systems, or paleontological resources. Accordingly, implementation of the reinstated Ordinance would have neither additional impacts nor more severe impacts on geology and soils than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of geology and soils is required.

Greenhouse Gas Emissions

Section 4.16, *Climate Change*, of the 2010 General Plan EIR determined that impacts to greenhouse gas (GHG) emissions and GHG reduction targets would be potentially significant with implementation of the 2010 General Plan. Mitigation measures CC-1 through CC-5, BIO-1.9, CC-12 and CC-13 in the 2010 General Plan EIR would reduce potential impacts to GHG emissions to less than significant. The 2010 General Plan would not conflict with California GHG reduction goals, or any applicable plan, policy, or regulation. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA and other regulations, plans and policies concerning GHG emissions such as those that aim to reduce GHG emissions.

As discussed in Environmental Checklist Section 8 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to GHG emissions. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to GHG emissions than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of GHG emissions is required.

Hazards and Hazardous Materials

Section 4.13, *Hazards and Hazardous Materials*, of the 2010 General Plan EIR determined that impacts related to hazards and hazardous materials would be less than significant. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning hazards and hazardous materials.

As discussed in Environmental Checklist Section 9 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to hazards and hazardous materials. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to hazards and hazardous materials than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of hazards and hazardous materials is required.

Hydrology and Water Quality

Section 4.3, *Water Resources*, of the 2010 General Plan EIR determined that implementation of the General Plan would result in significant and unavoidable impacts related to groundwater supply, demand for water storage, treatment, and conveyance facilities, and exceeding the capacity of existing water supply. Impacts related to water quality were determined to be less than significant. In addition, two addenda were prepared (Addendum No. 1 and Addendum No. 2) that describe the potential changes or additions to the General Plan FEIR that would result from amendments to the General Plan proposed and adopted in 2013. The Addenda concluded that the proposed changes to the General Plan would not result in either additional impacts or an increase in the severity of impacts.

The 2010 General Plan EIR assumed in Section 4.3, *Water Resources*, that "individualized water treatment is cost prohibitive and not allowed". The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning hydrology and water quality. All other impacts such as impacts related to drainage and runoff would be less than significant.

As discussed in Environmental Checklist Section 10 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to hydrology and water quality. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to GHG emissions than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of hydrology and water quality is required.

Land Use and Planning

Section 4.1, *Land Use*, of the 2010 General Plan EIR determined that impacts to land use would be less than significant as they pertain to conflicts with applicable land use plans. It found that 2010 General Plan implementation would not physically divide an established community and would, in fact, increase local and regional connectivity, which it identified as a beneficial impact. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning land use and planning.

As discussed in Environmental Checklist Section 11 of the Initial Study (Appendix B), the Ordinance would have no impacts related to land use and planning. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to land use and planning than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of land use and planning is required.

Mineral Resources

Section 4.5, *Mineral Resources*, of the 2010 General Plan EIR determined that impacts to mineral resources would be less than significant. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning mineral resources.

As discussed in Environmental Checklist Section 12 of the Initial Study (Appendix B), the Ordinance would have no impacts related to mineral resources. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to mineral resources than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of mineral resources is required.

Noise

Section 4.8, *Noise*, of the 2010 General Plan EIR determined that implementation of the General Plan would result in less than significant impacts with implementation of the General Plan, Area Plan, and Community Area policies incorporated in the 2010 General Plan. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning noise.

As discussed in Environmental Checklist Section 13 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to noise. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to noise than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of noise is required.

Population and Housing

Section 4.15, *Population and Housing*, of the 2010 General Plan EIR determined that the 2010 General Plan would not displace any houses or people, nor require the construction of replacement housing elsewhere. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning population and housing. However, the 2010 General Plan would induce population growth, resulting in a significant and unavoidable impact.

As discussed in Environmental Checklist Section 14 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to population and housing. Therefore, implementation of the reinstated Ordinance would have neither additional impacts nor more severe impacts to population and housing than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of population and housing is required.

Public Services

Section 4.11, *Public Services and Utilities*, of the 2010 General Plan EIR determined that implementation of the General Plan would not result in substantial adverse physical impacts associated with new or physically altered public services facilities, including those related to fire, police, schools, and libraries, and impacts would be less than significant. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning public services. Implementation of the 2010 General Plan would, however, result in a significant and unavoidable impact related to future schools potentially affecting adjoining land uses.

As discussed in Environmental Checklist Section 15 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to public services. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to public services than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of public services is required.

Recreation

Section 4.12, *Parks, Recreation and Open Space*, of the 2010 General Plan EIR determined that impacts to existing park and recreational facilities and the necessity for new and/or expanded recreational facilities would be less than significant with implementation of mitigation measure PAR-1 and 2010 General Plan policies. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010

General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning recreation.

As discussed in Environmental Checklist Section 16 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to recreation. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts on recreation than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of recreation is required.

Transportation

Section 4.6, *Transportation*, of the 2010 General Plan EIR determined that 2010 General Plan-related trip generation in combination with existing and proposed cumulative development would result in inadequate emergency access and designated road and/or highways that would exceed the Congestion Management Agency service standards, and no feasible mitigation was identified. The 2010 General Plan EIR identifies mitigation measures TRAN-1E, TRAN-5A and TRAN-2B to reduce impacts; however, impacts would be significant and unavoidable. Other impacts were determined to be less than significant, including hazardous roadway design features. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the 2010 General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning transportation.

As discussed in Environmental Checklist Section 17 of the Initial Study (Appendix B), the Ordinance would have no impact related to conflicts with transportation programs and plans, and less than significant impacts related to transportation hazards and emergency access. However, development facilitated by the Ordinance would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and would have potentially significant impacts related to vehicle miles travelled (VMT).

VMT impacts were not considered in the 2010 General Plan EIR. When the 2010 General Plan EIR was prepared, the metric used to analyze transportation impacts was level of service (LOS). LOS is a measure of delay and congestion, and evaluates how well a roadway or intersection operates for drivers. VMT measures the total amount of vehicle travel generated by a project or area, and focuses instead on how many vehicle miles are traveled rather than how congested roadways are. In 2010, LOS was the standard metric for evaluating transportation impacts under CEQA. In 2013, Senate Bill (SB) 743 was signed into law, which directed the Office of Planning and Research (now the Office of Land Use and Climate Innovation, or LCI) to establish new criteria for determining the significance of transportation impacts that better align with air quality and GHG emissions rather than congestion and roadway operation, and VMT became the metric for determining significant transportation impacts.

Pursuant to CEQA Guidelines Section 15007(b), new requirements adopted through amendments to the Guidelines apply only to steps in the CEQA process that have not yet been undertaken as of each amendment's effective date. Section 15007(c) further provides that a CEQA document which satisfied the content requirements in effect *at the time it was released for public review* is not required to be revised to conform to subsequently adopted guideline amendments prior to final approval. Pursuant to CEQA Guidelines Section 15064.3, VMT analysis requirements apply only as provided in CEQA Guidelines Section 15007. Because an EIR addendum is not subject to required public review pursuant to CEQA Guidelines Section 15164(c), preparation of an addendum does not trigger the application of new or amended CEQA requirements, including VMT analysis.

The Final EIR for the 2010 General Plan was certified in 2010, prior to the enactment and implementation of SB 743 and the associated VMT requirements in the CEQA Guidelines. Accordingly, and consistent with CEQA Guidelines Sections 15007 and 15164, VMT analysis and thresholds do not apply to this Ordinance. Although development facilitated by the Ordinance could result in increased VMT, the applicable CEQA framework does not require evaluation of VMT impacts for this action. Moreover, the 2010 General Plan EIR identified significant and unavoidable transportation impacts, and the Ordinance would not result in any new or more severe transportation impacts beyond those previously disclosed and evaluated.

Although EIR addenda are not subject to public review, as stated in CEQA Guidelines Section 15164(c), this Addendum shall be circulated for public review as a courtesy to the public, to provide an opportunity for public comment on the Addendum, and to disclose the basis for the County's decision-making and CEQA determination for the Ordinance.

Tribal Cultural Resources

California Assembly Bill 52 (AB 52) was adopted in 2014, after the 2010 General Plan EIR was certified. AB 52 expanded CEQA by requiring analysis of tribal cultural resources, defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. AB 52 also established a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified.

Although the 2010 General Plan EIR was certified prior to adoption of AB 52, the County consulted with Native American tribes pursuant to Government Code Section 65352.3. The County of Monterey initiated consultation with local Native American representatives in spring 2007. Six tribal groups were consulted through consultation efforts. The County met with representatives of the Ohlone Costanoan Esselen Nation (OCEN) Tribe on about six occasions to review general plan language relative to archaeology, burial sites, and paleontology. None of the other tribal groups responded to the request for consultation. Several language changes were suggested by the OCEN representatives and incorporated in the 2010 General Plan and the EIR, including General Plan Policies OS-8.1 and OS-8.3. Policy OS-8.1 states that unique burial sites will be identified and protected, and that burials, shrine sites, and sacred place locations shall be preserved in place to the greatest extent possible and as permitted by law Policy OS-8.3 states that, in areas known to contain burials or human cemeteries, development shall not modify, disturb, excavate, or develop within such areas until compliance with CEQA, the Native American Heritage Commission, the Health and Safety Code and Government Code, and any Memoranda of Understanding with a local tribe have been achieved. An OCEN representative was present at the Planning Commission hearings and agreed to the current 2010 General Plan language. Impacts related to tribal cultural resources were determined to be less than significant in the 2010 General Plan EIR. In addition, Public Resources Code Section 21080.3.1 requires consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR, not an EIR addendum.

As discussed in Environmental Checklist Section 18 of the Initial Study (Appendix B), the Ordinance would have no new impacts related to tribal cultural resources not already identified and discussed in the 2010 General Plan EIR. Development facilitated by the Ordinance would continue to be subject to the County's planning review process, which would involve evaluating individual projects for consistency with the 2010 General Plan and applicable area plans that contain policies related to tribal cultural resources. Therefore, implementation of the reinstated Ordinance would not have additional impacts or more severe impacts to tribal cultural resources than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of tribal cultural resources is required.

Utilities and Service Systems

Section 4.11, *Public Services and Utilities*, of the 2010 General Plan EIR determined that the General Plan would result in significant and unavoidable impacts related to future solid waste facilities. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations related to utilities and service systems. The General Plan EIR identifies mitigation measures PS-1 and PS-2 to reduce impacts by adding policies to the General Plan related to solid waste and low impact development techniques; however, impacts would be significant and unavoidable. All other impacts to utilities and service systems, such as stormwater drainage or wastewater facilities, would be less than significant.

As discussed in Environmental Checklist Section 19 of the Initial Study (Appendix B), the Ordinance would have less than significant impacts related to utilities and service systems. Therefore, implementation of

the reinstated Ordinance would not have additional impacts or more severe impacts to utilities and service systems than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of utilities and service systems is required.

Wildfire

Section 20, *Wildfire*, was added to Appendix G in 2018 after the 2010 General Plan EIR was certified. The 2010 General Plan included a brief discussion of wildfire impacts, summarized in Section 4.13, *Hazards and Hazardous Materials*, of the 2010 General Plan EIR. This section determined that impacts related to wildfire would be less than significant. The County's certified LCP is applicable in the unincorporated coastal zone, and in general, requires a discretionary coastal permit for development. As such, all future projects pursuant to the General Plan or County's certified LCP would be required to conform to zoning, design standards, CEQA, and other regulations concerning wildfires.

Environmental Checklist Section 20 of the Initial Study (Appendix B) includes an expanded discussion of wildfire, in accordance with the most recent version of Appendix G of the CEQA Guidelines. As discussed therein, the Ordinance would have less than significant impacts related to wildfire. Therefore, implementation of the reinstated Ordinance would have neither additional impacts nor more severe impacts to wildfire than those analyzed by the 2010 General Plan EIR. No additional environmental assessment of wildfire is required.

Conclusion

Implementation of the amended and reinstated Ordinance would allow the use POU or POE as an alternative method to achieve uncontaminated water, following the lead of the State. The Ordinance would not involve site-specific projects nor changes in the currently adopted General Plan land uses or certified Local Coastal Program land uses. Therefore, development facilitated by the Ordinance amendments would continue to fall within the impact analysis in the County's 2010 General Plan EIR certified in October 2010. Future development facilitated by the Ordinance would be subject to applicable development standards and reviews under County plans, policies, and regulations, and future development involving discretionary review are subject to CEQA.

It has been determined through this analysis that the Ordinance amendments would not result in significant impacts or increase in severity of significant impacts beyond those addressed or analyzed in the 2010 General Plan EIR, nor does the Ordinance present new information that shows new significant impacts or more severe impacts than those described in the General Plan EIR. Therefore, no additional environmental assessment is required. Pursuant to Section 15162, the Ordinance is within the scope of the existing certified EIR, an addendum to the existing EIR is appropriate, and no new environmental document, such as a new EIR, is required.

Although CEQA Guidelines Section 15164(c) does not require public circulation of an EIR addendum, this Addendum is being circulated for informational purposes only, as a courtesy to the public, to disclose the basis for the County's CEQA determination for the Ordinance. The Monterey County Board of Supervisors shall consider the Addendum with the final 2010 General Plan EIR prior to deciding on the Ordinance.

List of Preparers

Rincon Consultants prepared this Addendum under contract to the County of Monterey Environmental Health Bureau. Persons involved in data gathering analysis, project management, and quality control are listed below.

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Appendix A

Proposed Amendments to the Point of Use/Point of Entry Ordinance

ORDINANCE NO._____

AN ORDINANCE OF THE COUNTY OF MONTEREY, STATE OF CALIFORNIA AMENDING CHAPTER 15.06 OF THE MONTEREY COUNTY CODE RELATING TO POINT-OF-USE AND POINT-OF-ENTRY WATER TREATMENT SYSTEMS

County Counsel Summary

This ordinance amends Chapter 15.06 to the Monterey County Code to authorize and regulate point-of-use (POU) and point-of-entry (POE) water treatment for new construction on a vacant existing lot of record that will be served by either a domestic water system or a private well that would otherwise not meet primary drinking water standards. The amendment requires that EHB approve the POU or POE device to be installed and that the applicant provide EHB with water test results following installation that verify the device's effectiveness. The amendment also requires that the property owner record a deed restriction regarding the installation of the POU or POE. Finally, this ordinance allows a POU or POE device to be used to meet water quality requirements for construction of an ADU that will be served by water system or a private well, provided that all dwelling units on the property also install a POU or POE device. This ordinance applies in the unincorporated area of the County of Monterey.

The Board of Supervisors of the County of Monterey ordains as follows:

SECTION 1. FINDINGS AND DECLARATIONS.

A. Pursuant to Article XI, Section 7 of the California Constitution, the County of Monterey ("County") may adopt and enforce ordinances and regulations not in conflict with general laws to protect and promote the public health, safety, and welfare of its citizens.

B. This ordinance amendment is intended to ensure that the water delivered to new homes supplied by domestic water systems and private wells complies with applicable drinking water standards per Chapter 15 of Title 22 of the California Code of Regulations, as may be amended from time to time, and incorporated into Monterey County Code Chapter 15.04.110 with the objective of providing pure, wholesome, and potable water at all times. This ordinance amendment is intended to provide a new treatment option as an affordable means to accomplish this objective for new dwellings.

C. Centralized treatment systems treating contaminants of concern are expensive, and there is a lack of state funding for local small and state small water systems and limited state funding for privately owned public water systems. The installation of point-of-use ("POU") or point-of-entry ("POE") water treatment devices is a viable affordable option for property owners that want to construct new homes in these impacted water systems while allowing water systems sufficient time to pursue a long-term solution for provision of safe potable water, such as but not limited to centralized water treatment, a new well or consolidation.

D. On June 18, 2019, the Board of Supervisors ("Board") adopted Ordinance No. 5310, which addressed POE and POU treatment. Ordinance No. 5310 amended sections of Chapter 15.04 of the Monterey County Code and added a new Chapter 15.06 to authorize and regulate POU and POE water treatment by local small, state small, and small public water systems that would otherwise not meet primary drinking water standards. Ordinance No. 5310 also provided that if an individual property owner is seeking new construction on an existing legal lot with water that does not meet primary water quality standards, the owner may install POU or POE treatment as a means of satisfying water quality standards necessary for a construction permit for development.

E. On July 26, 2019, litigation was served on the County challenging the validity of Ordinance No. 5310 on a variety of grounds including California Environmental Quality Act ("CEQA") compliance.

F. On August 27, 2019, the Board adopted Ordinance No. 5316 which suspended the operation of Sections 3 and 6 and a portion of Section 5 of Ordinance No. 5310 until December 11, 2019. The suspended sections pertained to POU or POE treatment by local small water systems, state small water systems, and individual existing lots of record on private wells ("Suspended Sections").

G. On December 10, 2019, the Board adopted Ordinance No. 5322 which extended the suspension of the operation of Suspended Sections until further action of the Board.

H. On November 28,2023, the Board adopted Ordinance No. 5408 which allowed local and state small water systems to install POU or POE treatment on active service connections to bring the system into compliance with water quality standards.

I. Adoption of this ordinance reinstates and amends the Suspended Sections of Ordinance No. 5310 regarding approval of new construction using POU or POE to meet primary drinking water standards on existing lots of record served by either a domestic water system or private well.

J. Pursuant to a settlement agreement stemming from the CEQA litigation, the County hired a consultant to prepare an Initial Study to analyze the environmental impacts, if any, from this ordinance. Based on the findings of the Initial Study and applicable CEQA Guidelines (Title 14, Division 6, Chapter 3 of the California Code of Regulations), the County finds that an Addendum to the 2010 Monterey County General Plan Environmental Impact Report ("2010 General Plan EIR") is appropriate. CEQA Guidelines section 15164 requires the County, the lead agency, to "prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in [Guidelines] Section 15162 calling for preparation of a subsequent EIR have occurred." Those conditions include 1) substantial changes as to the project or the circumstances under which the project is undertaken that would require "major revisions of the previous EIR" due to either new significant environmental effects or a substantial increase in the severity of previously-identified significant effects; and 2) the discovery of "new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete" showing new significant effects not analyzed by the

previous EIR, increased severity of significant effects previously analyzed, or previously infeasible or new, considerably different mitigation measures or alternatives that would substantially reduce one or more significant project effects on the environment that the lead agency declines to adopt. None of these conditions exists. Consequently, and because the 2010 General Plan EIR included sufficient buildout assumptions to account for this project's effects, the CEQA Guidelines require the County to proceed by Addendum.

O. CEQA Guidelines section 15164(c) provides that an addendum "need not be circulated for public review." Nevertheless, the County publicly circulated the Addendum for public comment and response prior to bringing the Addendum to the Board of Supervisors for adoption together with this ordinance.

SECTION 2. Chapter 15.06 of the Monterey County Code is amended to read as follows:

Chapter 15.06

POINT-OF-USE (POU) AND POINT-OF-ENTRY (POE) WATER TREATMENT SYSTEMS

Sections:

15.06.010 – Findings and purpose.
15.06.020 – Definitions.
15.06.030 – Applicability.
15.06.040 – POU or POE Treatment Implementation Options.
15.06.050 – POU or POE Permit Requirements for Water Systems.
15.06.054 – POU and POE Requirements for New Dwelling Units.
15.06.057 – POU and POE Requirements for Additional Dwelling Units on a Property.
15.06.060 – POU and POE Treatment Device Technical Requirements for Water Systems.
15.06.070 – POU and POE Treatment Strategy for Water Systems.
15.06.080 – POU and POE Operations and Maintenance (O&M) Program for Water Systems.
15.06.090 – POU and POE Monitoring Program for Water Systems.
15.06.100 – POU and POE Recordkeeping and Reporting Requirements for Water Systems.
15.06.110 – POU and POE Water System Compliance.
15.06.120 – POU and POE Water System Enforcement.

15.06.010 Findings and purpose.

A. The County of Monterey regulates local small water systems consisting of two (2) to four (4) service connections, and state small water systems consisting of five (5) to

fourteen (14) service connections. Many of these water systems are impacted by contaminants of concern such as nitrate, arsenic, fluoride or chromium VI.

B. The County recognizes that centralized treatment systems treating contaminants of concern are expensive, and there is a lack of state funding for state and local small water systems. The installation of point-of-use (POU) or point-of-entry (POE) water treatment devices is a viable affordable option for these impacted water systems while they pursue a long term solution for provision of safe potable water such as but not limited to centralized water treatment, a new well, or consolidation.

C. POE treatment ensures that all water entering a structure provides a higher level of protection to public health from ingestion and exposure to contaminants than POU treatment.

D. POU treatment provides treated water at a single tap for reducing contaminants in drinking water only at that tap to protect public health from ingestion and exposure to contaminants.

E. On October 9, 2015, State of California Assembly Bill No. 434 ("AB 434") took effect. AB 434 amended California Health and Safety Code sections 116380 and 116552, which pertain to POE and POU treatment by public water systems.

F. On January 22, 2019, the State Water Resources Control Board adopted regulations that allow the permitted use of POE and POU treatment by public water systems in lieu of centralized treatment by making modifications to Title 22 of the California Code of Regulations, beginning with section 64417. On February 7, 2019, the State Water Resources Control Board submitted the adopted regulations to the Office of Administrative Law for review and approval. On March 22, 2019, the state regulations were signed by the Secretary of State and became effective. The state law applies to public water systems of 15 service connections or more and limits the use of POE and POU treatment to public water systems of fewer than 200 service connections and limits the period of use to three years or until funding for centralized treatment is available, whichever occurs first.

G. Monterey County Code Section 15.04.146(c) allows local small water systems (2 to 4 service connections) and state small water systems (5 to 14 service connections) to install POU or POE water treatment devices in conformance with the regulations of this Chapter. The purpose of this Chapter is to establish local County regulations, to govern the use of POE and POU treatment by local small water systems and state small water systems, similar to the recent changes in state law which govern larger public water systems.

H. By establishing regulations for POE and POU treatment, the County also recognizes that local small and state small water systems differ significantly in technical, managerial, and operational capacity in comparison to public water systems in that local small and state small water systems may find installation of centralized treatment financially, managerially, and operationally infeasible.

I. The County finds that bottled water use, although appropriate for disaster emergency response, is not a suitable alternative nor a permanent substitute for an

environmentally sustainable, financially affordable, readily accessible and reliable source of drinking water for local small and state small water systems.

J. This Chapter is also intended to provide an option for water quality treatment for owners of existing lots of record who are seeking approval of new development but whose water from a private well or existing local small, state small, or small public water system does not meet drinking water standards required for issuance of a construction permit. This chapter provides the option of POU or POE treatment meeting the standards of this chapter as a means of satisfying water quality requirements for permit issuance.

K. The County recognizes that the County has a housing shortage and allowing a POU or POE water treatment system may help facilitate new construction on existing lots of record upon which water quality does not meet drinking water standards.

~~J~~L. On December 4, 2018, the Board of Supervisors of the County of Monterey recognized the importance of the Human Right to Safe Drinking Water and passed Resolution No. 18-385 proclaiming that "every human being has the right to safe, clean, affordable and accessible water adequate for human consumption, cooking and sanitary purposes and that this right is extended to all residents of Monterey County including disadvantaged individuals and groups and communities in rural and urban areas".

M. The County recognizes that future land uses may include Accessory Dwelling Units (ADUs) that are served by an impacted water system. The occupants of ADUs, which may include tenants who do not control the water supply, have a human right to safe drinking water. Consequently, this chapter requires new ADUs and existing main dwellings to either satisfy primary drinking water standards or to install a POU or POE treatment system meeting established criteria prior to approval for occupancy

15.06.020 Definitions.

Words used in the present tense include the future as well as the present. Words used in the masculine gender include the feminine and neuter. The singular includes the plural and the plural the singular.

As used in this Chapter, unless otherwise apparent from the context:

A. "Accessory dwelling unit" has the same meaning as "dwelling unit, accessory" set forth in Monterey County Code section 21.06.372, as may be amended from time to time.

B. "Active service connection" means a service connection, as defined in Subsection (S) of this Section, that serves an already existing habitable structure.

C. "Centralized treatment" means a single treatment plant or device that treats all of the water supplied by a water system for human consumption.

D. "Consumer" means a customer or person served by the water system.

E. “Contaminant” means any physical, chemical, biological, or radiological substance or matter in water.

F. “Department” means the Monterey County Health Department.

G. “Director” means the Director or authorized representative of the Monterey County Health Department, designated to carry out the drinking water program.

H. "Domestic water system" means any water system including a local small water system, state small water system, or small public water system.

I. “Dwelling unit” has the same meaning as set forth in Monterey County Code section 21.06.370, as may be amended from time to time.

J. “Human consumption” means the use of water for drinking, bathing or showering, hand washing, food preparation, cooking, or oral hygiene.

K. “Impacted water system” means a domestic water system that does not meet primary water quality standards per Chapter 15 of Title 22 of the California Code of Regulations, as may be amended from time to time, as such standards are incorporated into Chapter 15.04.110 of the Monterey County Code.

L. “Laboratory” for the purposes of this Chapter means a laboratory that is accredited by the California Environmental Laboratory Accreditation Program.

M. “Local small water system” means a system for the provision of piped water for human consumption that serves at least two (2), but not more than four (4), service connections. It includes any collection, treatment, storage, and distribution facilities under control of the operator of such system which are used primarily in connection with such system, and any collection or pretreatment storage facilities not under the control of the operator which are used primarily in connection with such system. “Local small water system” does not include two (2) or more service connections on a single lot of record where none of the dwellings are leased, rented or offered for remuneration.

N. “Maximum contaminant level” or “MCL” means the maximum permissible level of a contaminant in water.

O. “Person” includes an individual, firm, association, partnership, corporation, and public entity.

P. “Point-of-entry” or “POE” means a treatment device applied to the drinking water entering a house or building for the purpose of reducing contaminants in the drinking water distributed throughout the house or building. Notwithstanding the foregoing, where all the water supplied by a water system for human consumption is treated by the water system via a single device or facility, regardless of location of the device or facility, the water system shall be considered to have centralized treatment.

Q. "Point-of-use" or "POU" means a treatment device applied to a single tap for the purpose of reducing contaminants in drinking water at that tap.

R. "Primary water quality standards" means drinking water standards per Chapter 15 of Title 22 of the California Code of Regulations, as may be amended from time to time, as such standards are incorporated by reference into section 15.04.110 of the Monterey County Code.

S "Private well" means a source that both serves a single lot of record and does not meet the definition of a domestic water system. Private wells also include other sources such as a spring or creek.

~~S~~T. "Service connection", consistent with Section 21.06.1010, of the Monterey County Code, means a connection to any habitable structure, except a guesthouse, or parcel which uses potable water from a water system for domestic and not agricultural purposes.

In addition, pursuant to California Health and Safety Code Section 116275(s), "service connection" means the point of connection between the customer's piping or constructed conveyance, and the water system's meter, service pipe, or constructed conveyance. A connection to a system that delivers water by a constructed conveyance other than a pipe shall not be considered a connection in determining if the system is a public water system if any of the following apply:

1. The water is used exclusively for purposes other than residential uses, consisting of drinking, bathing, and cooking or other similar uses.

2. The Health Officer determines that the alternative water to achieve the equivalent level of public health protection provided by the applicable primary drinking water regulation is provided for residential or similar uses for drinking and cooking.

3. The Health Officer determines that the water provided for residential or similar uses for drinking, cooking, and bathing is centrally treated or treated at the point of entry by the provider, a pass-through entity, or the user to achieve the equivalent level of protection provided by the applicable primary drinking water regulations.

~~T~~U. "State small water system" means a system for the provision of piped water to the public for human consumption that serves at least five (5), but not more than fourteen (14), service connections and does not regularly serve drinking water to more than an average of twenty-five (25) individuals daily for more than sixty (60) days out of the year. It includes any collection, treatment, storage, and distribution facilities under control of the operator of such system which are used primarily in connection with such system, and any collection or pretreatment storage facilities not under the control of the operator which are used primarily in connection with such system.

15.06.030 Applicability.

This Chapter applies to new and existing local small and state small water systems~~.~~, individual property owners whose property is part of an impacted water system and individual

property owners with a private well that do not meet primary water quality standards in the unincorporated area of the County of Monterey. ~~This Chapter only applies to active service connections~~.

15.06.040 POU or POE Treatment Implementation Options.

A. A local small or state small water system (2-4 connections and 5-14 connections respectively) may be permitted to use effective POU or POE treatment devices. Water systems who choose this alternative will be deemed as a "*Compliant Water System Utilizing Treatment*" if 100% of the service connections have installed a POU or POE treatment device in accordance with this Chapter and the water system meets the requirements of Section 15.06.110 of this Chapter.

B. A property owner seeking a construction permit for a new dwelling unit on a legal lot of record which will be served by either an impacted water system that is unable to meet the requirements of a compliant water system or a private well that does not meet primary water quality standards may choose to install an effective POU or POE treatment per Monterey County Code Section 15.06.054.

C. A property owner seeking a construction permit for an additional new or converted dwelling unit such as an accessory dwelling unit (ADU), that is served by an impacted water system or private well that does not meet primary water quality standards may choose to install an effective POU or POE treatment per Monterey County Code Section 15.06.057.

~~B~~D. For local small water systems, ~~and~~ state small water systems, and individuals served by an impacted water system or private well, POU treatment is not allowed for treatment of microbial contaminants, volatile organic chemicals, organic chemicals that pose an inhalation risk, or radon.

~~C~~E. POU treatment or POE treatment is not authorized as the means to establish proof of water quality for applications for new subdivisions. Discretionary approval for new subdivisions shall not be conditioned to use POU treatment or POE treatment for water systems as the means by which the lots to be created by the subdivision would meet primary water quality standards.

15.06.050 POU or POE Permit Requirements for Water Systems.

A. A local small or state small water system that chooses to implement a POU or POE treatment program must apply for and obtain an amendment to the water system permit pursuant to Monterey County Code Section 15.04.070 prior to use of POU or POE treatment. The applicant must do the following:

1. Submit an application for a permit amendment to implement a POU or POE treatment program on such form as the Department may prescribe.

2. For a mutual water company or shared well, provide a copy of the articles of incorporation or a valid water system agreement, which indicates who is responsible for complying with water system permitting requirements. If the mutual water company or shared well does not have articles of incorporation or a valid water system agreement, then articles of incorporation or a written water system agreement must be adopted in order to establish responsibility for complying with water system permitting requirements for the POU or POE treatment.

3. Provide documentation that the proposed POU or POE treatment device complies with the treatment device technical requirements pursuant to Monterey County Code Section 15.06.060.

4. Submit a POU or POE treatment strategy pursuant to Monterey County Code Section 15.06.070 for the Director's review and approval.

5. Submit a POU or POE operations and maintenance program pursuant to Monterey County Code Section 15.06.080 for the Director's review and approval.

6. Submit a POU or POE monitoring program pursuant to Monterey County Code Section 15.06.090 for the Director's review and approval.

7. Provide evidence that 100% of the service connections will participate in the approved POU or POE treatment.

B. The Director shall issue the permit amendment to the water system if all of the following requirements are met:

1. Applicant has submitted the application and all required supporting documentation;

2. The POU or POE treatment device meets technical requirements in accordance with this Chapter;

3. The Director has approved the treatment strategy, operations and maintenance program, and monitoring program in accordance with this Chapter;

4. The water system has demonstrated that 100% of the service connections will participate in the approved POU or POE treatment; and

5. The water system is in compliance with annual operating fee requirements as stated in Monterey County Code Section 15.04.150.

C. The Director may issue the permit amendment to the water system per Subsection B of this Section if all requirements except Subsection B(4) are met, but the water system would not be deemed a fully compliant system.

D. The permit amendment for a POU or POE treatment device shall be valid for one (1) year. The permit amendment must be renewed annually in order for the water system to be

deemed a "*Compliant Water System Utilizing Treatment*". In order to renew the permit amendment, the water system shall submit to following to the Director for review and approval:

1. Application for renewal;

2. Records maintained per Monterey County Code Section 15.06.100; and

3. If opportunities for grant funding resources to support long term water treatment solutions become available, the water system shall demonstrate that it is pursuing such funding in order to be eligible for renewal.

E. The Director shall issue the renewed permit amendment to the water system if all of the following requirements are met:

1. Applicant has submitted the application for permit renewal and all required supporting documentation.

2. The most recent test of each installed POU or POE meets primary water quality standards.

3. The water system is in compliance with the Director approved treatment strategy, operations and maintenance program, and monitoring program in accordance with this Chapter.

4. The water system has demonstrated that 100% of the service connections have an approved POU or POE treatment.

5. The water system is in compliance with annual operating fee requirements as stated in Monterey County Code Section 15.04.150.

15.06.054 POU and POE Requirements for New Dwelling Units.

A. A property owner seeking a construction permit for a new dwelling unit on a vacant lot that will be served by either an existing impacted water system or private well that does not meet primary water quality standards may install a POU or POE treatment to satisfy water quality requirements for issuance of the construction permit if all of the following requirements are met:

1. Prior to County issuance of a construction permit, the applicant shall submit plans to the Director for review and acceptance of a private POU or POE treatment device that will produce water that meets primary water quality standards;

2. The POU or POE treatment device shall either be selected from the California State Water Resources Control Board list of approved devices for the specific contaminant impacting the water system or shall be independently certified in accordance with the American National Standard Institute ("ANSI") standards;

3. The applicant shall provide the Director with copies of both a the real property's legal description and most current grant deed. The Director will prepare a deed restriction form to be signed and recorded by the property owner. The purposes of the deed restriction are to notify the current and future owners of the property that a POU or POE water treatment system has been installed on the property, that the water treatment system is necessary to meet primary water quality standards, and that the property owner is responsible to operate and maintain the system in accordance with the manufacturer's specifications.

4. Prior to final inspection of a construction permit, the applicant shall submit water quality analysis results of a treated water sample to demonstrate that the installed Director- approved water POU or POE treatment system produces water that meets primary water quality standards.

5. Prior to County issuance of final occupancy, the applicant shall provide documentation to the Department that the Director- prepared deed restriction has been signed and recorded in the Office of the Recorder of the County of Monterey.

B. If a new dwelling unit will be served by a well that does not meet primary water quality standards and will require creation of a new local or state small water system, the water system will be required to be a *Compliant Water System Utilizing POU or POE Treatment* in order to be an approved source for the construction permit for a new dwelling unit.

C. A property owner seeking a construction permit for a new dwelling unit that will be served by a water system that has a permit amendment for POU or POE treatment will be required to install a treatment device in conformance with the water system POU/POE Treatment Strategy prior to County issuance of final occupancy.

15.06.057 POU and POE Requirements for Additional Dwelling Units on a Property.

A. A property owner seeking a construction permit for an additional new or converted dwelling unit such as an accessory dwelling unit (ADU) that is served by either an impacted water system or private well that does not meet primary water quality standards may install a POU or POE treatment to satisfy water quality requirements for issuance of the construction permit if all of the following requirements are met:

1. Prior to approval of a construction permit, the applicant shall submit plans to the Director for review and acceptance of a private POU or POE treatment device that will produce water that meets primary water quality standards. The approved POU or POE treatment device must be installed on each dwelling unit on the property;

2. The POU or POE treatment device shall be selected from the California State Water Resources Control Board list of approved devices for the specific contaminant impacting the water system or shall be independently certified in accordance with the American National Standard Institute ("ANSI") standards;

3. The applicant shall provide a copy of the real property's legal description and a copy of the grant deed for the subject property to the Director. The Director will prepare the deed restriction form to be signed and recorded by the property owner. The purpose of the deed restriction is to notify the current and future owners of the property that a POU or POE water treatment system has been installed on the property, that the water treatment system is necessary to meet primary water quality standards, and that the property owner is responsible to operate and maintain the system in accordance with the manufacturer's specifications;

4. Prior to final inspection of a construction permit, the applicant shall submit water quality analysis results of a treated water sample to demonstrate that each installed Director- approved water POU or POE treatment system produces water that meets primary water quality standards; and

5. Prior to County issuance of final occupancy, the applicant shall provide documentation to the Department demonstrating that the Director-prepared deed restriction has been signed and recorded in the Office of the Recorder of the County of Monterey.

15.06.060 POU and POE Treatment Device Technical Requirements for Water Systems.

A. Each POU and POE treatment device for a water system must meet all of the requirements set forth below.

1. The POU or POE treatment device shall be selected from the California State Water Resources Control Board list of approved devices for the specific contaminant impacting the water system or shall be independently certified in accordance with the American National Standard Institute ("ANSI") standards.

2. The POU or POE treatment device shall be approved by the Director, following a review of, without limitation, the POU or POE unit's design, construction, treatment performance, waste disposal, and available field or pilot test results.

3. The POU or POE treatment device shall be installed, controlled, operated, and maintained by the water system, or a person under contract with the water system with the water system retaining responsibility, to ensure proper operation, maintenance, monitoring, and compliance with this Chapter and Monterey County Code Section 15.04.110 drinking water standards. For a mutual water company or shared well, if agreed upon by each property owner, the water system may delegate authority for installation, operation, maintenance, and sampling to each property owner.

4. If the POU or POE treatment device is a reverse osmosis system, it shall be equipped with a total dissolved solid in-line analyzer.

5. If the POU or POE treatment device utilizes an adsorptive media, the system shall be equipped with a totalizing flow meter, if requested by the Director.

B. Pilot testing shall be performed by the water system, or a person under contract with the water system on each proposed type of POU or POE treatment device to establish its use limitations and operations and maintenance criteria, as well as verification that it will produce effluent that meets primary water quality standards under the water system's expected influent water quality and flow conditions.

1. Prior to performing pilot testing, a pilot testing protocol shall be submitted to the Director for review, and the water system shall obtain Director approval of the protocol.

2. Pilot testing for a POU or POE treatment device shall be conducted in the manner and for the time period specified by the pilot testing protocol for that POU or POE treatment device. Water quality samples for the constituent of concern shall be collected upon initial installation and a second test shall be conducted eight (8) weeks after the initial test, and both shall be submitted to a laboratory. Each sampling event shall include a raw and treated water sample. The water system shall request the laboratory to submit sample results to the Director.

15.06.070 POU and POE Treatment Strategy for Water Systems.

Prior to installing a POU or POE treatment device, a water system shall comply with a Director-approved POU/POE Treatment Strategy. The POU/POE Treatment Strategy shall include all of the following:

A. Specify the primary water quality standard for which treatment is proposed.

B. A description of how the water system will determine the type, number, and location of the POU or POE treatment devices to ensure a sufficient number of devices are installed for human consumption at all locations where there will be human consumption or use for food preparation.

C. The basis for the POU or POE treatment device selection.

D. The qualifications and identification of the person(s) responsible for the POU or POE treatment device installation, operation, maintenance, and water quality sampling and analyses. For a mutual water company or shared well, if agreed upon by each property owner, the water system may designate each property owner as the person responsible for their own POU or POE treatment device's installation, operation, maintenance, and water quality sampling and analyses.

E. A consumer education program to be implemented prior to and following installation of the POU or POE treatment device.

F. The authority that allows the water system's representatives access to consumers' premises for POU or POE treatment device installation, maintenance, and water quality monitoring, as well as the surveys necessary to meet Subsection (B) of this Section. For a mutual water company or shared well, if agreed upon by each property owner, the water system may designate each property owner as the person responsible for their own POU or POE treatment device's installation, operation, maintenance, and water quality sampling and analyses.

G. A plan to be used in the event an installed POU or POE treatment device fails to produce water that meets primary water quality standards that includes:

1. A consumer notification protocol, along with example notices, consistent with this Section 15.06.070; and

2. A plan for provision of an alternative water supply, meeting primary water quality standards, to consumers served by such installed POU or POE treatment devices.

H. An ongoing consumer notification protocol that includes:

1. Notices in the language(s) appropriate for communication with the consumers, distributed by mail, email or other electronic form such as text messaging; and

2. Annual notices informing the consumers:

a. That only the taps for which a POU or POE treatment device is installed provide water meeting primary water quality standards; and

b. The purpose and operational requirements for using the in-line total dissolved analyzer, if applicable as per Monterey County Code Section 15.04.080(A)(4).

15.06.080 POU and POE Operations and Maintenance (O&M) Program for Water Systems.

A. Prior to installing a POU or POE treatment device, a water system shall submit a POU/POE Operations and Maintenance (O&M) Program for Director review and shall obtain Director approval of the Program. The POU/POE O&M Program shall include, but not be limited to, the following:

1. An installation protocol that, at a minimum, describes locations and assurances that the POU or POE treatment devices will be accessible for operation and maintenance;

2. The type and frequency of maintenance, at intervals specified by the manufacturer and determined by pilot testing, whichever is shorter, that ensures the POU or POE treatment device produces effluent that meets primary water quality standards;

3. A list of replacement parts for the POU or POE treatment device;

4. Replacement schedules for critical components;

5. The qualifications and identification of the person(s) responsible for the POU or POE treatment device installation, operation, and maintenance; and

6. POU or POE treatment device waste-handling and disposal procedures.

B. A protocol for how the water system shall ensure that the POU or POE treatment device is functioning properly at least every twelve (12) months.

C. Based on the ongoing operation and maintenance of installed POU or POE treatment devices, a water system shall revise its POU or POE O&M Program as necessary to ensure continuous effective treatment and to ensure that systems produce effluent that meets primary water quality standards. The Revised POU or POE O&M Program shall be submitted to the Director for review and approval prior to implementation of the revised Program.

D. A water system shall maintain a copy of and implement its most recent POU/POE O&M Program prepared and approved pursuant to this Section.

15.06.090 POU and POE Monitoring Program for Water Systems.

A. A water system shall submit a POU/POE Monitoring Program to the Director for review and shall obtain Director approval of the Monitoring Program. The samples shall be analyzed by a laboratory as defined by Monterey County Code Section 15.06.020(l). At a minimum, the POU/POE Monitoring Program shall include monitoring of the contaminant(s) for which the water system has applied to use the POU or POE treatment device, as follows:

1. Initial POU/POE effluent, with samples collected as soon as possible but no later than seventy-two (72) hours after a device is installed;

2. Annual POU/POE effluent, following the monitoring in Subsection (A)(1) with one quarter (1/4) of all units sampled quarterly on a rotating basis; and

3. Quarterly source water monitoring, with samples collected during the same month (first, second, or third) of each calendar quarter. After one year of monitoring, a water system may apply to the Director for reduced ongoing monitoring if current and historical results do not indicate an upward trend in contaminant levels.

B. The Director may require further monitoring for the contaminant of concern or other contaminants, including microbial contaminants, based on monitoring results, the health risk associated with the contaminant, POU/POE technology, or a water system's compliance with this Chapter.

C. The water system shall revise its POU/POE Monitoring Program as necessary based on the ongoing operation and maintenance of installed POU or POE treatment systems or additional monitoring required pursuant to Subsection (B) of this Section. The Revised

POU/POE Monitoring Program shall be submitted to the Director for review and approval prior to implementation of the revised Program.

D. The water system shall maintain a copy of and implement its most recent POU/POE Monitoring Program prepared and approved pursuant to this Section.

E. If an ongoing POU/POE effluent sample result exceeds any primary water quality standard, the water system shall take all of the following actions:

1. Implement the public notification and alternative water procedures identified in its Director-approved POU/POE Treatment Strategy.

2. Except as noted in Subsection (E)(3) below, collect a confirmation sample within seven (7) days of notification of the exceedance.

3. For an exceedance of a nitrate, nitrite, nitrate plus nitrite, or perchlorate Maximum Contaminant Level (MCL):

a. As soon as possible, but no later than twenty-four (24) hours following notification of an exceedance, provide each affected consumer with notification; and

b. Collect a confirmation sample within seventy-two (72) hours of notification of the exceedance.

4. If the confirmation sample or the average of the original and confirmation sample exceeds the MCL, notify the Director within twenty-four (24) hours of the result, complete corrective actions as soon as possible but within one (1) month of receipt of the result, and increase the monitoring frequency if requested to do so by the Director.

15.06.100 POU and POE Recordkeeping and Reporting Requirements for Water Systems.

A. The water system shall direct the laboratory which analyzes any water quality samples collected pursuant to this Chapter to submit all such water quality results to the Director;

B. A water system shall maintain and submit the following records to the Director as follows:

1. The date and type of maintenance and repairs performed; and

2. Any investigations and/or corrective action(s) taken to ensure the POU or POE treatment device meets the requirements of this Chapter including, but not limited to, POU/POE maintenance, property owner complaints, inspection results, and manufacturer notices pertaining to proper operation of devices.

C. The reports required pursuant to Subsection (B)(1) and (B)(2) of this Section shall be submitted to the Director with the annual permit renewal application.

15.06.110 POU and POE Water System Compliance.

A water system utilizing POU or POE treatment devices for compliance shall be considered a Compliant Water System Utilizing Treatment if:

A. 100% of the service connections, including all dwelling units on the property, have installed a POU or POE treatment device in accordance with this Chapter;

B. The water system follows the requirements in Section 15.06.090(E) if an individual POU or POE treatment device effluent fails to meet primary water quality standards;

C. The water system is compliant with the Director-approved POU or POE Treatment Device Technical Requirements, Treatment Strategy, Operations and Maintenance Program, Monitoring Program, and Recordkeeping and Reporting requirements in accordance with this Chapter; and

D. The water system's utilization of the POU or POE treatment device complies with all requirements of this Chapter.

15.06.120 POU and POE Water System Enforcement.

A. If a water system that has been deemed a Compliant Water System Utilizing Treatment violates the requirements of this Chapter, the County may in its discretion, in addition to all other remedies, take such enforcement actions as are authorized by the Monterey County Code and by law, including enforcement pursuant to Chapter 15.04 as applicable to water systems.

B. In the event of a violation of this Chapter, the County may in its discretion, in addition to all other remedies, take such enforcement actions as are authorized by the Monterey County Code and by law.

SECTION 5. SEVERABILITY. If any section, subsection, sentence, clause or phrase of this ordinance is for any reason held to be invalid, such decision shall not affect the validity of the remaining portions of this ordinance. The Board of Supervisors hereby declares that it would have passed this ordinance and each section, subsection, sentence, clause and phrase thereof, irrespective of the fact that any one or more sections, subsections, sentences, clauses, or phrases be declared invalid.

SECTION 6. EFFECTIVE DATE. Under California Government Code section 25123, this Ordinance shall become effective on the thirty-first day following its adoption.

PASSED AND ADOPTED on this ___ day of _____, 2026, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Wendy Root-Askew, Chair
Monterey County Board of Supervisors

A T T E S T:

Valerie Ralph
Clerk of the Board of Supervisors

By: _____
Deputy

APPROVED AS TO FORM BY:

Kelly L. Donlon
Assistant County Counsel

Appendix B

Initial Study for the Point of Use/Point of Entry Ordinance Amendments



Point of Use/Point of Entry Ordinance Amendments

Initial Study

prepared by

County of Monterey
Environmental Health Bureau
1270 Natividad Road
Salinas, California 93906
Contact: Ric Encarnacion, MPH, REHS

prepared with the assistance of

Rincon Consultants
80 Garden Court, Suite 240
Monterey, California 93940

May 2026

RINCON CONSULTANTS

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Initial Study

1. Project Title

Point of Use/Point of Entry Ordinance Amendments

2. Lead Agency Name and Address

County of Monterey Environmental Health Bureau
1270 Natividad Road
Salinas, California 93906

3. Contact Person and Phone Number

Ric Encarnacion MPH, REHS
Bureau Chief, Director of Environmental Health
(831) 755-4505

4. Project Location

The project consists of the implementation of an amended ordinance that would apply to all local small, State small, and public water systems in the unincorporated area of Monterey County. Figure 1 shows the locations of these water systems and the planning areas of Monterey County. Figure 2 shows water systems with “Subject Lots,” where development facilitated by the project is anticipated to occur.

5. General Plan Designation

The amended ordinance would apply to all local small, State small, and public water systems in unincorporated Monterey County, which have varying land use designations. The general plan land use designations of water systems where development is anticipated to occur as a result of the project are shown in Table 2.

6. Zoning

The amended ordinance would apply to all local small, State small, and public water systems in unincorporated Monterey County, which have varying zoning districts. The zoning districts of water systems where development is anticipated to occur as a result of the project are shown in Table 2.

Figure 1 Local Small, State Small, and Public Water Systems in Monterey County

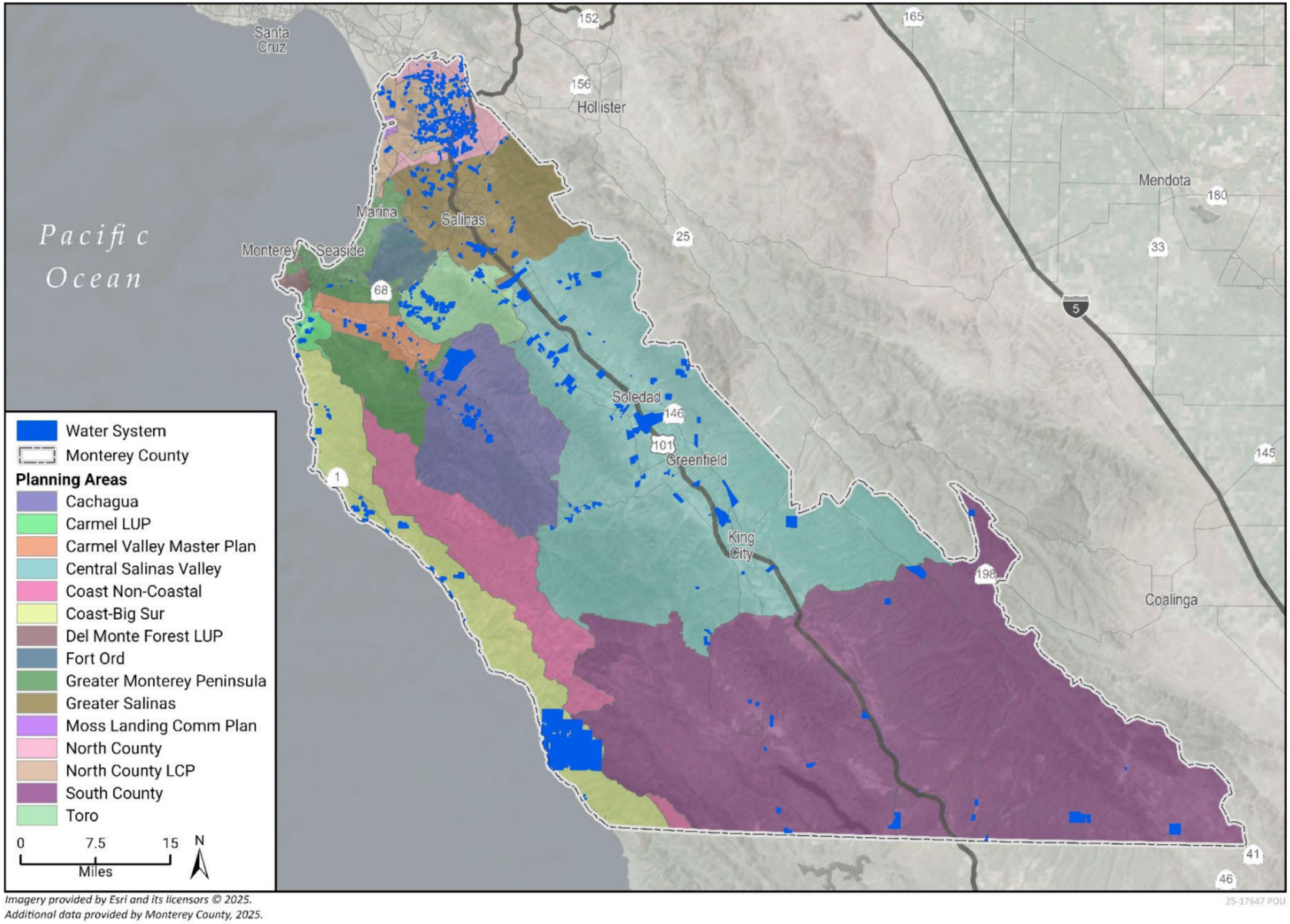
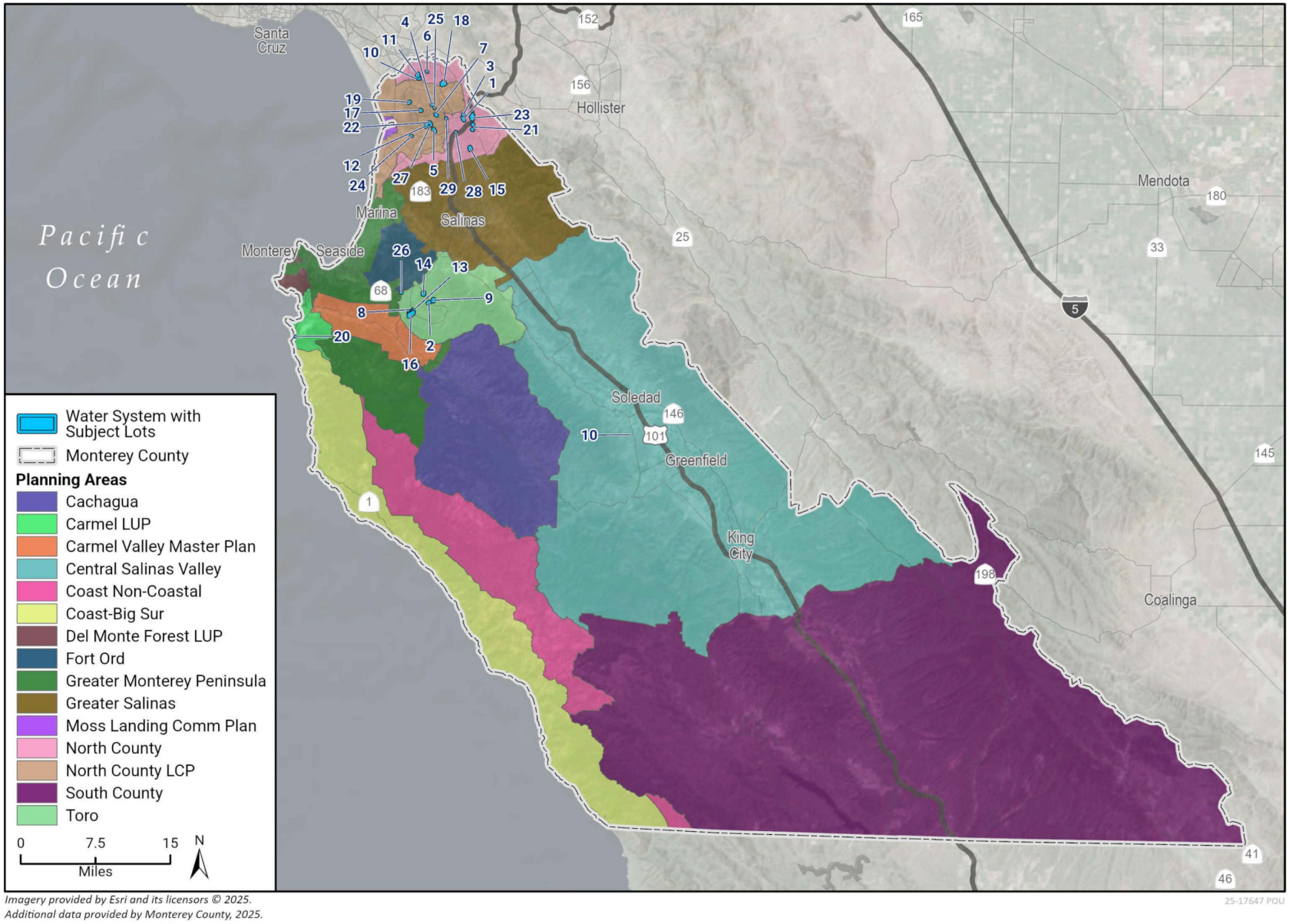


Figure 2 Water Systems with Subject Lots



7. Project Background

Water Systems, Regulations, and Compliance

The County of Monterey Environmental Health Bureau (EHB) regulates local small and State small water systems, including local small water systems with two to four service connections and State small water systems with five to 14 service connections. There are also public water systems, with 15 to 199 connections, that are no longer regulated by EHB but are still subject to the project considered herein. These water systems are drinking water well systems that typically serve multiple homes or parcels. The systems must comply with primary drinking water standards as established by Title 22 of the California Code of Regulations, incorporated by reference in Chapter 15.04 (Section 15.04.110) of the Monterey County Code.

Currently, many local small, State small, and public water systems in Monterey County are unable to meet drinking water standards due to contamination from substances such as nitrate, arsenic, fluoride, cadmium, hexavalent chromium, and 1,2,3-Trichloropropane. Many water systems in Monterey County are out of compliance for primary drinking water standards and maximum contaminant levels (MCLs), which poses public health risks. A water system or private well is out of compliance if it exceeds any of the following MCLs:[1]

- 0.005 micrograms per liter (µg/L) of 1,2,3-Trichloropropane (TCP)
- 5 µg/L of cadmium
- 10 µg/L of arsenic
- 10 µg/L of hexavalent chromium
- 2,000 µg/L of fluoride; and/or
- 10,000 µg/L of nitrate

Prior to passage of the Ordinance considered in this Addendum, options for water systems to comply with MCLs included consolidation with a neighboring compliant water system, drilling a new well, or installation of a centralized treatment system on an existing well. These compliance pathways are often infeasible due to geographic, technical, or financial constraints. If neighboring water systems are also noncompliant, water systems cannot be consolidated for compliance, meaning that drilling a new well may be both physically and financially difficult. Centralized treatment systems, in which a shared water treatment facility treats an entire water system from a single point typically at the water's source, are often complex and expensive. Further, because the entire water system with a centralized treatment system must comply with MCLs before a new water connection is added, it is often practically prohibitive to both propose development and add a new connection to the system.

To address these constraints, the Monterey County Board of Supervisors adopted Ordinance No. 5310 (Ordinance) on June 18, 2019. The Ordinance amended Chapter 15.04 and enacted Chapter 15.06 of the Monterey County Code to address point of entry ("POE") and point of use ("POU") water treatment when water supply does not meet primary drinking water standards. The Ordinance would allow treatment of water quality at the POU (such as a faucet) or POE (such as the entrance to a house) for existing non-compliant water systems, where previously only centralized treatment for these water systems (i.e., at the source) was allowed. The Ordinance would also enable building permit requirements to be met for water quality for individual vacant lots within non-compliant water systems and individual lots not within water systems if POU or POE water treatment were installed,

[1] State Water Resources Control Board. 2025. MCLs, DLRs, and PHGs for Regulated Drinking Water Contaminants. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/mclreview/mcls_dlrs_phgs.pdf (accessed January 2026).

and certain requirements were met. The Ordinance was modeled after State regulations that apply to public water systems with more than 14 connections.

Environmental Review and Ordinance Suspension

In June 2019, the County determined that adoption of the Ordinance was categorically exempt from CEQA. The State regulations, which the Ordinance was modeled after, were also adopted in reliance upon certain categorical exemptions under CEQA. After adoption of the Ordinance, concerns were raised regarding the validity of the Ordinance on a variety of grounds, including insufficient CEQA review. These concerns included assertions that the Ordinance could be growth-inducing, in that POU or POE water treatment devices would remove a barrier to development, ultimately facilitating the development of vacant lots within local small, State small, and public water systems and development on individual lots served by wells that do not meet water quality standards. Based on these considerations, questions were raised as to whether reliance on a categorical exemption was appropriate.

To provide time to further evaluate the Ordinance, the Board of Supervisors adopted a subsequent ordinance on August 27, 2019 to suspend portions of the Ordinance (hereinafter referred to as the "Suspended Sections") until December 11, 2019. On December 10, 2019, the Board of Supervisors adopted an ordinance to extend this suspension until further action of the Board. The Suspended Sections would have governed use of POU and POE water treatment devices on individual wells that serve individual lots that are not within water systems where the well water does not meet drinking water standards. POU or POE water treatment devices on these types of lots (single lot, individual well) have been approved by EHB in recent years if certain requirements are met; the Suspended Sections would have codified this practice. The sections in the Ordinance pertaining to small public water systems (15 or more connections) remained. They went into effect because those systems are subject to existing State law and regulations that govern the use of POU or POE water treatment devices.

On November 28, 2023, the Board of Supervisors adopted Ordinance 23-020, which reinstated a portion of the Suspended Sections that allows POU and POE treatment on properties with active service connections in local small and state small water systems. This action is different from the Ordinance considered in this Addendum, as it applies to active service connections only, and does not allow the use of POU or POE treatment to result in new development. EHB now proposes to further amend the Ordinance to allow the use of POU and POE on vacant legal lots of record and/or ADUs within water systems that are out of compliance with water quality standards, which would allow new development. As part of the County's efforts to resolve the issues raised and to ensure appropriate environmental review, the County has retained a consultant to conduct review of the Ordinance pursuant to CEQA.

8. Description of Project

Reinstated Ordinance

The "project" considered in this Addendum consists of adoption and implementation of the amended and reinstated Ordinance, which would allow the use of POU and POE water treatment devices non-compliant properties on private wells and to lots in all local small, State small, and public water systems in the unincorporated area of Monterey County. The proposed amendments to the Ordinance are shown in Appendix A.

The project would potentially increase the number of parcels where POU or POE water treatment may be used, and could increase buildout compared to baseline growth. Pursuant to the settlement agreement, EHB has evaluated potential growth that could be made possible by the reinstated Ordinance in this Initial Study. The following sections discuss how the physical extent of potential buildout facilitated by the project was estimated.

Potential Buildout Facilitated by the Reinstated Ordinance

Determination of Subject Lots

Parcels which may not otherwise be feasibly or affordably developed without adoption of the Ordinance are referred to "Subject Lots" in this Initial Study. Subject Lots are located in water systems that are out of compliance with MCLs, as described and listed above in "Water Systems, Regulations, and Compliance." To estimate the number of Subject Lots where development facilitated by the Ordinance would occur, potential development scenarios were identified, as the Ordinance would allow multiple pathways for local small, State small, and public water systems to achieve water quality compliance. These development scenarios are intended to capture a comprehensive range of scenarios in which development could be facilitated by the Ordinance; however, there could be unique situations not identified herein.

Development Scenarios

Development Scenario 1 Use of POU or POE water treatment devices to achieve compliance for an existing water system with no inactive connections

Development Scenario 2 Approval of development using POU or POE water treatment devices within an existing water system with inactive connections. This includes the following types of development:

- An individual lot within a water system (provided the water system of which the individual lot is a member is unwilling to install central treatment)
- An accessory dwelling unit (ADU)[2] that relies on a shared well as part of a water system

Development Scenario 3 Approval of development of an individual lot served by a private well where water quality does not meet the primary drinking water standards using POU or POE water treatment devices

Development Scenario 4 Approval of development of an ADU on an individual lot with a private well (not part of a water system) where water quality does not meet the primary drinking water standards using POU or POE water treatment devices

Development Scenario 5 Approval of development of a subdivision using POU or POE water treatment devices on a private individual well on each lot

Development Scenario 6 Approval of development on a vacant lot, or developed lot(s) and other neighboring vacant lot(s), that decide to come together to create a new water system or development of a neighboring vacant lot that joins an existing water system

Growth-Inducing Development Scenarios

The following section identifies which development scenarios have the potential to induce growth compared to baseline conditions.

Prior to approval of the Ordinance, under Development Scenario 1, the only way an existing local or State water system with no inactive connections could come into compliance was using centralized treatment, which is often cost prohibitive. With reinstatement of the Ordinance, under Development Scenario 1, non-compliant systems could utilize POU or POE water treatment devices, instead of a

[2] "Accessory dwelling unit" is defined by the Monterey County Code Section 21.06.372 as "a permanent residence, secondary to an existing main dwelling, which provides complete independent living facilities for one or more persons. It shall include permanent provision for living, sleeping, eating, cooking, and sanitation on the same parcel where the single-family dwelling is situated."

centralized system . This portion of the Ordinance was reinstated in 2023 through Ordinance 23-020, which allows POU and POE treatment on properties with active service connections in local small and state small water systems. Therefore, since this development is already allowed, this is not considered a change-over-baseline and **there is no further growth potential under Development Scenario 1** with reinstatement of the Ordinance.

Similar to Development Scenario 1, prior to approval of the Ordinance under Development Scenario 2, the only way a water system could be approved was using centralized treatment. Further, under Development Scenario 2, if an individual lot was within a water system that was out of compliance, under existing conditions the County would require the entire water system to become compliant using centralized treatment before any inactive connections could be activated. It is important to note, this scenario also includes approval of an ADU using an available inactive connection that relies on a shared well and is part of a water system, since approvals of ADUs are treated as an individual connection by EHB (please see Development Scenario 4 below for additional discussion of ADUs). With reinstatement of the Ordinance, under Development Scenario 2, an out of compliance water system with inactive connections would be able to utilize POU or POE water treatment devices, instead of a centralized treatment. Therefore, reinstatement of the Ordinance would be considered a change-over-baseline and, since there are inactive connections, a potential scenario where development could occur. In other words, if an inactive connection or a vacant lot (including one with an ADU connection) is served by a non-compliant water system, reinstating the Ordinance would allow these previously undevelopable lots to potentially be developed using POU or POE water treatment devices. As stated above, centralized treatment is more costly and practically prohibitive than POU or POE water treatment devices. Therefore, this change-over-baseline under **Development Scenario 2 can be considered potentially growth-inducing** as reinstatement of the Ordinance would remove an existing barrier to growth.

Development Scenario 3 is similar to Development Scenario 2, except that the individual lot would connect to a well (not a water system) that does not meet water quality standards. However, Development Scenario 3 is different than Development Scenario 2 since previously the EHB would approve a POU or POE water treatment device on a lot with an individual well if a deed restriction was recorded. Since the Ordinance was suspended, EHB has required centralized treatment for new development on private wells. Reinstatement of the Ordinance would reinstate the practice of allowing POU or POE water treatment devices for new development on private wells. As stated above, centralized treatment is more costly and practically prohibitive than POU or POE water treatment devices. Therefore, this change-over-baseline under **Development Scenario 3 can be considered potentially growth-inducing** as reinstatement of the Ordinance would remove an existing barrier to growth.

Development Scenario 4 pertains specifically to development of ADUs on an individual well where water quality does not meet the primary drinking water standards. Under existing conditions, an ADU is evaluated by EHB as if it is an individual connection, requiring water quality testing and, if necessary, centralized treatment. With reinstatement of the Ordinance, an ADU on an individual lot with a private well could be approved by EHB using POU or POE water treatment devices, representing a change-over-baseline. In both instances (existing conditions and reinstatement of the Ordinance), the addition of the ADU results in the creation of a water system needing a water system permit (unless the owner agrees to a deed restriction, which would then make the ADU fall under Development Scenario 3).

It is important to acknowledge that County Ordinance Nos. 5341 and 5343,[3] adopted by the County Board of Supervisors in September 2020, implement State law (Government Code Section 65852.2) that reduces local government discretion over approval of ADUs and streamlines approval by requiring a ministerial process. Previously, ADUs on a private well in Monterey County were not

[3] As of the drafting of this IS-MND, the coastal ADU ordinance (Ordinance No. 5343) is pending certification by Coastal Commission and is not in effect. If a local ordinance is not adopted, per Government Code section 65852.2, state standards apply in conjunction with, in the coastal zone, the County's certified Local Coastal Program.

allowed to be approved using POU or POE if the well exceeded water quality standards; instead, centralized treatment was required. However, in aligning with State ADU law, EHB will likely be required to allow the development of an ADU regardless of the type of treatment system proposed. This, combined with other ADU streamlining provisions, may result in the production of more ADUs Countywide. While this potential increase in ADUs would be facilitated primarily by State law, implemented via County Ordinance Nos. 5343 and 5341, this analysis will conservatively assume that ADU development would be made equally possible by reinstatement of the Ordinance. Accordingly, **Development Scenario 4 has growth-inducing potential.**

For Development Scenario 5, which pertains to development of subdivisions, Section 15.06.040.E of the Ordinance prohibits approval of a new subdivision using POU or POE for the water system if the water system includes 2 to 14 connections and requires treatment. Therefore, POU or POE water treatment devices cannot be relied upon for treatment, even with reinstatement of the Ordinance. EHB has not historically allowed the use of POU or POE water treatment devices as the basis of approval of new subdivisions, with one exception. In that exception, the subdivision was approved using POU or POE water treatment devices, where there were existing private wells for existing development on each of the lots to be created by the subdivision. It is EHB's intent to eliminate the possibility of using POU or POE water treatment in future subdivisions on private wells, and to only allow new subdivisions to use centralized treatment if water treatment is necessary. Therefore, reinstatement of the Ordinance alone under **Development Scenario 5 would not be considered growth-inducing** and this development scenario is not analyzed further.

Lastly, under Development Scenario 6, lots – developed, vacant, or a combination of both – could choose to utilize a shared private well which would result in the creation of a new water system. Development Scenario 6 includes the possibility of a neighboring vacant lot joining an existing water system. Under existing conditions, development of the lot in this scenario would only be allowed with centralized treatment of a water quality issue, but with reinstatement of the Ordinance, this type of development could potentially be allowed with POU or POE water treatment devices. Therefore, this type of development would represent a change-over-baseline and a potential scenario where growth could occur. **Development Scenario 6 is considered growth-inducing.**

The potential for each scenario to result in a change-over-baseline and/or be growth inducing is summarized in Table 1 below. As noted therein, Development Scenarios 1 and 3 would not cause a change-over-baseline and/or be growth inducing. **Development Scenarios 2, 5, 4, and 6 could cause a change-over-baseline and would potentially be growth inducing**. As such, these three scenarios may result in a Subject Lot for the purpose of this analysis.

Table 1 Summary of Baseline and Development Scenario Assumptions

Development Scenario	Existing Conditions	Passage of Suspended Sections	Change-Over-Baseline?	Potentially Growth Inducing?
1: Use of POU or POE water treatment devices to achieve compliance for an existing water system with no inactive connections	Already allowed by Ordinance 23-020.	No new changes, would remain allowed.	No	No, because there are no inactive connections.
2: Approval of development using POU or POE water treatment devices within an existing water system with inactive connections. This includes the following types of development: • An individual lot within a water system (provided the water system of which the individual lot is a member is unwilling to install central treatment) • An accessory dwelling unit (ADU) that relies on a shared well as part of a water system	Not allowed, centralized treatment required if system is out of compliance.	Allowed, the development could be approved using POU or POE water treatment devices.	Yes	**Yes**
3: Approval of development of an individual lot served by a private well where water quality does not meet the primary drinking water standards using POU or POE water treatment devices	Not allowed, centralized treatment required if system is out of compliance.	Allowed, POU or POE water treatment devices may be used for approval pursuant the MCC.	Yes	**Yes**
4: Approval of development of an ADU on an individual lot with a private well (not part of a water system) where water quality does not meet the primary drinking water standards using POU or POE water treatment devices	Not allowed, centralized treatment required if system is out of compliance.	Allowed, an ADU within a system could be approved using POU or POE water treatment devices.	Yes	**Yes**
5: Approval of development of a subdivision using POU or POE water treatment devices on a private individual well on each lot	Not supported for new undeveloped lots.	Not allowed, POU or POE water treatment devices may not be used for approval for new development.	No	No, because subdivisions would only be allowed to use centralized treatment if water treatment is necessary.

Development Scenario	Existing Conditions	Passage of Suspended Sections	Change-Over-Baseline?	Potentially Growth Inducing?
6: Approval of development on a vacant lot, or developed lot(s) and other neighboring vacant lot(s), that decide to come together to create a new water system or development of a neighboring vacant lot that joins an existing water system	Not allowed, centralized treatment required if system is out of compliance.	Allowed, POU or POE water treatment devices may be used for approval.	Yes	**Yes**

Buildout Estimation Methodology

This section describes the methodology used to estimate the potential future buildout of Subject Lots in the County under the project (i.e., implementing the Ordinance). As stated above, Development Scenarios 2, 4, and 6 represent a change-over-baseline, which could result in additional development throughout the County due to reinstatement of the Ordinance.

Subject Lots – Development Scenarios 2 and 6

To quantify buildout of Development Scenario 2, vacant lots within an out-of-compliance water system were quantified using County-provided GIS data which was input into an online mapping tool. This final online mapping tool provided a product by which water systems could be viewed and filtered using their compliance, inactive connection, and zoning status.

To visualize the individual lots that may be built under Development Scenario 2, water systems were filtered for those systems which had a compliance issue and had greater than zero inactive connections. Then each of these water systems were examined individually to understand the development potential and whether there was indeed a vacant lot with an inactive connection that may be built using POU or POE water treatment. . In addition, vacant lots were crossed checked against the Monterey County zoning map to ensure that they were zoned for residential development.

Only under Development Scenario 2 was a quantitative approach feasible to estimate the potential future buildout of Subject Lots in the County under the project. Under Development Scenario 6, there are several variables that affect approval of these types of development, such as appropriate zoning, location of vacant lots in relation to zoning, as well as individual well capacity and cost of multiple wells. Isolating those variables to predict how changing one variable (passage of the Suspended Sections of the Ordinance) would affect growth potential in the County would be conjectural. As a result, a qualitative analysis is provided below for these scenarios.

Wells on Individual Lots – Development Scenario 3

As outlined above, there would be a change-over-baseline for the approval of individual lots using domestic wells (Development Scenario 3). To quantify the development potential under this scenario, historic permit data was analyzed. Monterey County's permit tracking software (Accela) was queried to quantify the number of individual lots using domestic wells and ADUs that have been approved.

Accessory Dwelling Units – Development Scenario 4

To conservatively estimate and analyze the maximum buildout scenario that could be attributed to the project, the growth projections herein assume that the development of ADUs within out-of-compliance water systems would be solely facilitated by the Ordinance, and not by State law and County Ordinances Nos. 5341 and 5343. To estimate the number of ADUs that could be facilitated in out-of-compliance water systems by the Ordinance, the number of ADU permit applications received

by Monterey County Housing and Community Development (HCD) since 2018 was reviewed. For purposes of this Initial Study, it is assumed that each permit application resulted in the construction of an ADU. However, the application data provided by Monterey County HCD does not indicate whether the associated ADUs were ultimately approved or built. As a result, this Initial Study may overestimate actual ADU development, therefore providing a conservative analysis of ADU buildout.

2018 was selected as a baseline year as this is when several impactful ADU reforms occurred at the state level. Reforms passed in 2018 include but are not limited to Senate Bill 229, which strengthened state oversight of local ADU ordinances and clarified standards, and Assembly Bill 494, which made several changes to ADU regulations to further streamline approvals. Since 2018, then, County ADU applications were only possible for parcels in compliant local small, State small, or public water systems. The Ordinance would facilitate the development of ADUs within out-of-compliance water systems, where they previously would have been more difficult to develop; therefore, the rate of ADU development across in-compliance water systems would generally represent the rate of ADU development within out-of-compliance systems, as POU or POE treatment would make it generally equally feasible to develop ADUs in water systems regardless of compliance status. The rate of ADU applications in other water systems was applied to the number of out-of-compliance water systems to estimate the rate of ADU development facilitated by the Ordinance.

The annual rate of ADU applications within in-compliance water systems since 2018 has been variable. For example, there were only four applications for ADUs for parcels within in-compliance systems between January 1, 2018 and December 31, 2020, and 16 applications between January 1, 2021 and December 31, 2023. The number of ADU permit applications within in-compliance systems peaked in 2025, with 20 applications submitted between January 1 and December 31. This increased 2025 rate may be associated with updates to the California Building Code that took effect on January 1, 2026. It is likely that some ADU applicants sought to apply for permits before new, more stringent development standards became effective. Although 2025 is likely an outlier, the County wishes the analysis to be conservative. Accordingly, this analysis will use the rate of 20 ADU applications per year to provide a conservative estimate of the number of ADUs that could be facilitated by the reinstated Ordinance.

Although the reinstated Ordinance would facilitate ADU development within compliant water systems, actual construction of ADUs would continue to be constrained by other factors. As discussed above, there is a gap between ADU applications filed and actual finalized, issued ADU permits. Applicants sometimes begin the ADU permitting process of but later abandon their plans once they discover the high costs of construction. In particular, the cost of installing new or upsized septic systems to accommodate proposed ADUs is often high enough to deter potential ADU applicants. Consequently, the rate of 20 ADUs per year is unlikely to be realized, as costs and other constraints would likely limit the actual ADUs that are ultimately built. .

The County intends for this Addendum to analyze direct and reasonably foreseeable indirect physical changes in the environment that may be caused by the project, while also analyzing a reasonable buildout scenario based on evidence. The County intends to avoid speculation. Accordingly, it would be unrealistic to assume that the project would result in the development of 20 ADUs per year indefinitely, especially given that this rate is conservative and unlikely to reflect reality and absent evidence . that market conditions, infrastructure capacity, and applicant behavior would sustain that rate long-term. Therefore, this analysis will use a ten-year horizon to estimate ADU development facilitated by the Ordinance, and this Addendum will consider a total of 200 ADUs. A ten-year horizon is consistent with programmatic planning documents, such as housing elements or general plans, which typically evaluate program-level effects across eight to 20 years. Therefore, this analysis shall use a ten-year planning horizon to evaluate the potential development of 200 ADUs throughout out-of-compliance water systems.

Buildout Estimation Results

Subject Lots – Development Scenarios 2 and 6

As outlined above, to understand the buildout potential for local small, State small, and public water systems with inactive connections or vacant lots (Development Scenario 2), County-provided GIS data was used to view existing vacant lots within out-of-compliance water systems throughout the County. The results of the mapping analysis are provided above in Figure 2 and below in Table 2.[4] The results indicate that there are 44 vacant parcels within a water system that is out of compliance. As shown in the figure, vacant lots are primarily congregated in the Toro Planning Area as well as the North County Planning Area, the North County Coastal Land Use Plan area, and the Central Salinas Valley Planning Area. Further details on these parcels are outlined in Table 2.

Forty-one of the vacant lots are residentially zoned, either as Low Density Residential (LDR) or Rural Density Residential (RDR). Therefore, development of one unit per lot is typically allowed with a ministerial permit unless some aspect of the project triggers a discretionary permit (e.g., zoning overlay, tree removal, building on slopes). The three remaining vacant lots are zoned as Resource Conservation (RC), which also allow one single family dwelling unit per lot. The LDR, RDR, and RC zoning districts all allow one secondary guesthouse per lot, with development standards established in Monterey County Code Section 21.64.020.

Of the 44 vacant lots, 17 are located within water systems that are out of compliance for hexavalent chromium. Three lots are located within water systems out of compliance for nitrate, one is located within a water system out of compliance for fluoride, and nine are located within water systems that are out of compliance for arsenic.

Under Development Scenario 6, multiple landowners would need to come together to connect to an existing private well and create a new water system or agree to allow a new lot into the existing water system. It is highly unlikely that the owner of a private well would be willing to give adjacent landowners permissions to connect to their well, as this would escalate the well into a water system with accompanying regulations. Further, the adjacent landowner could drill their own well, if the capacity exists, instead of using the single well. This would likely be preferable to a new water system and would move this type of development to Development Scenario 3. As a result, although this scenario is possible and could potentially result in additional growth throughout the County, a combination of highly unlikely conditions would be required. As a result, it is not expected that the amount of additional approvals under Development Scenario 6 would be substantial. Therefore, the number of Subject Lots made possible by Development Scenario 6 is expected to be very minimal.

[4] Note specific water system information has been omitted in order to respect the privacy of the owners of the water system.

Table 2 Characteristics of Subject Lots

Water System Map Number	Water System ID	Compliance Issue[1]	General Plan Land Use Designation[2]	Zoning Designation[2]	Number of Vacant Lots[1]
1	2700778	hexavalent chromium	Resource Conservation	RC – Resource Conservation	6
2	2708809	arsenic	Residential – Low Density	LDR – Low Density Residential	2
3	2701424	hexavalent chromium	Resource Conservation	RC – Resource Conservation	1
4	2701519	hexavalent chromium	Residential – Rural Density (Coastal Zone)	RDR – Rural Density Residential	1
5	2702117	hexavalent chromium	None	LDR – Low Density Residential	1
6	2702414	hexavalent chromium	Residential – Low Density	LDR – Low Density Residential	1
7	2701520	nitrate	None	RDR – Rural Density Residential	1
8	2701743	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
9	2702113	arsenic	Residential – Low Density	LDR – Low Density Residential	3
10	2701796	hexavalent chromium	Residential – Low Density	RDR – Rural Density Residential	2
11	2702469	hexavalent chromium	Residential – Low Density	LDR – Low Density Residential	2
12	2700801	hexavalent chromium	None	LDR – Low Density Residential	1
13	2701412	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
14	2701450	arsenic	Residential – Low Density	LDR – Low Density Residential	1
15	2702313	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
16	2702445	arsenic	Residential – Rural Density	RDR – Rural Density Residential	1
17	2702676	hexavalent chromium	None	RDR – Rural Density Residential	1
18	2701885	hexavalent chromium	Residential – Rural Density	RDR – Rural Density Residential	1
19	2701618	hexavalent chromium	None	RDR – Rural Density Residential	1
20	2702809	fluoride	None	LDR – Low Density Residential	2

Water System Map Number	Water System ID	Compliance Issue[1]	General Plan Land Use Designation[2]	Zoning Designation[2]	Number of Vacant Lots[1]
21	2702007	hexavalent chromium	Resource Conservation	RC – Resource Conservation	3
22	2700674	hexavalent chromium	None	RDR – Rural Density Residential	2
23	2700713	nitrate	Resource Conservation, Residential – Rural Density	RDR – Rural Density Residential	2
24	2700548	hexavalent chromium	None	RDR – Rural Density Residential	1
25	2700594	hexavalent chromium	None	RDR – Rural Density Residential	1
26	2700612	arsenic	Residential – Low Density	LDR – Low Density Residential	1
27	2700624	hexavalent chromium	None	LDR – Low Density Residential	1
28	2701926	arsenic	Residential – Low Density	LDR – Low Density Residential	1
29	2702608	nitrate, hexavalent chromium	Residential – Low Density	LDR – Low Density Residential	1
Total Vacant Lots					**44**

Sources:

1. Environmental Health Bureau Local Small, State Small, and Public Water System Compliance data, updated in 2026.
2. County of Monterey, 2026. Zoning GIS database. https://montereyco.maps.arcgis.com/apps/InformationLookup/index.html?appid=1dce0909198142128bc57aee61c811ea

Wells on Individual Lots – Development Scenario 3

Between 2010 and 2020, ten single family residences on domestic wells in individual lots have been approved using POU or POE treatment devices (Fowler 2020). More recent data is not available because centralized treatment has been required for development occurring under this scenario since suspension of the Ordinance at the end of 2019. Ten developments on domestic wells in individual lots between 2010 and 2020 represents a development rate of one residence per year under Development Scenario 3. One residence per year is a reasonable development rate as it reflects observed development of residences on domestic wells in individual lots. As discussed under "Accessory Dwelling Units – Development Scenario 4" in *Buildout Estimation Methodology* above, this analysis will use a ten-year planning horizon. Accordingly, it is estimated that approximately 10 residences would be facilitated under Development Scenario 3.

Accessory Dwelling Units – Development Scenario 4

Based on historic permit application data, the County has received 68 ADU applications for parcels located within an in-compliance water system since 2018, and 20 of these were received in 2025. This growth projection will use the number of ADU permit applications for parcels within in-compliance systems from 2025 to provide a conservative analysis, as discussed under "Accessory Dwelling Units – Development Scenario 4" in "Buildout Estimation Methodology." Therefore, it is assumed that approximately 20 ADUs per year would be facilitated by the Ordinance over 10 years, for a total of 200 ADUs.

Other Development Scenarios

Development Scenario 1 is already allowed by Ordinance 23-020, and therefore it is not considered further. Development Scenario 5 (subdivisions) would not cause development because the revised Ordinance specifically prohibits approval of new subdivisions using POU or POE water treatment. New subdivisions would be required to use centralized treatment if water treatment is necessary.

Buildout Estimation Summary

Buildout facilitated by the reinstated Ordinance is summarized in Table 3. In total, the project could facilitate development of approximately 54 new single-family units, plus up to 20 ADUs per year for approximately 10 years.

Table 3 Estimated Project Buildout

Development Scenario	Number of Potential Future Lots/Units	Considered Subject Lots
Local and State Small Water Systems with active connections (Development Scenario 1)	None, no potential for growth because active connections are already developed	Not applicable
Local and State Small Water Systems with inactive connections (Development Scenario 2)	44 single-family units	Yes
Individual Wells (Development Scenario 3)	1 per year for 10 years; 10 single-family units	No
ADUs on private well (Development Scenario 4)	20 per year for 10 years; 200 ADUs	Yes
Subdivisions (Development Scenario 5)	None, will not be allowed	No
Creation of a New System (Development Scenario 6)[1]	Unknown, but not expected to be substantial	Yes

9. Other Public Agencies Whose Approval is Required

The County of Monterey is the lead agency for this project. The Monterey County Board of Supervisors would have to approve the reinstated Ordinance. There are no other public agencies with approval power over the project.

10. Approach to Analysis

Pursuant to CEQA Guidelines Section 15063, the County, as Lead Agency, will prepare an Initial Study to determine whether the project may have a significant effect on the environment and to identify the appropriate form of CEQA documentation for the project. The Initial Study is intended to provide a preliminary evaluation of environmental effects, and will address all environmental topic areas identified in Appendix G of the CEQA Guidelines. Based on the results of the Initial Study, the County will determine whether there is substantial evidence that the project, either individually or cumulatively, may result in a significant environmental effect. If such evidence exists, the County will determine whether to: (1) prepare an EIR; (2) use a previously prepared EIR that the County determines would adequately analyze the environmental effects of the proposed project; or (3) rely on tiering, a program EIR, or another appropriate CEQA process to identify which effects have been adequately addressed in prior environmental documentation and which effects, if any, require further analysis in a subsequent EIR or negative declaration. If the Initial Study finds no substantial evidence that the project or any of its components may have a significant effect on the environment, the County will prepare a Negative Declaration or Mitigated Negative Declaration, as appropriate.

Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

Determination

Based on this initial evaluation:

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

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

■ I find that although the proposed project could have a significant effect on the environment, all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project.



Signature	Date
	05/05/2026
Printed Name	Title
Ric Encarnacion	Bureau Chief, Director of Environmental Health

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	■	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

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

The Monterey County General Plan identifies scenic resources within Monterey County. Scenic vistas include the Santa Lucia and Gabilan mountain ranges, the Salinas Valley and Carmel Valley, Big Sur, and the County's coastline (County of Monterey 2010). Water systems are located throughout unincorporated Monterey County; while the identified Subject Lots are concentrated in the northern portion of the County, the Ordinance would facilitate development of single-family units and ADUs in out-of-compliance water systems throughout the County. Accordingly, development facilitated by the Ordinance could be located within the viewsheds of these mountain ranges, valleys, and the coastline.

The Ordinance would facilitate development of a relatively small number of residences throughout Monterey County. Residential development is already allowed in these areas; the Ordinance would allow alternative and lower-cost water treatment options, thereby removing an economic constraint that could otherwise limit development. Development made feasible by the Ordinance would occur within existing local small, State small, and public water systems, which are already characterized by low density residential uses. As shown in Table 2, the Ordinance would facilitate the addition of relatively few residences to each water system where growth is already anticipated. The incremental addition of a small number of single-family units within these water systems, as well as the potential development of ADUs in rural residential areas, would be consistent with the existing development pattern. Further, development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development permits. The planning review process would consider an individual project's consistency with County plans and regulations that pertain to visual resources, including General Plan policies, Local Coastal Program policies, and ordinances related to visual resources and designated scenic areas. Therefore,

development facilitated by the Ordinance would not substantially alter the visual character of these areas or substantially affect views from scenic vistas. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Several officially designated scenic highways occur in Monterey County, including multiple segments of State Route (SR) 1 and County-designated routes such as Laureles Grade Road and Interlake Road/ Nacimiento Drive (California Department of Transportation 2026, County of Monterey 2010). Water systems are located throughout Monterey County, and it is possible that development facilitated by the Ordinance could be located within the viewshed of a designated scenic highway.

Development made feasible by the Ordinance would occur within existing local small, State small, and public water systems, which are already characterized by low density residential uses. Development that may occur within Subject Lots or other water systems throughout the County would be visually consistent with existing development. Further, development facilitated by the Ordinance would remain subject to Monterey County development standards, and future development within scenic viewsheds would be reviewed for potential effects to trees, rock outcroppings, and historic buildings. Therefore, the Ordinance would not substantially damage scenic resources within a scenic highway, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Public Resources Code 21071 defines urbanized and non-urbanized areas. An unincorporated area is considered urbanized if it completely surrounded by one or more incorporated cities, if it is located within an urban growth boundary, or if the area has as existing residential population of at least 5,000 people per square mile. Given that local small, State small, and public water systems typically serve more rural residential development outside of the service areas of municipal or regional water providers, development facilitated by the Ordinance would generally occur in non-urbanized areas.

As discussed above, development made feasible by the Ordinance would occur within existing local small, State small, and public water systems, which are already characterized by low density residential uses. As shown in Table 2, the Ordinance would facilitate the addition of a limited number of residences within water systems where growth is anticipated. The incremental increase of single-family units and ADUs within out-of-compliance water systems would be consistent with existing, lower-density residential development in these water systems. Further, development facilitated by the Ordinance would remain subject to the County's design review process, which would ensure that proposed development is consistent with development standards prior to individual project approval. Therefore, the Ordinance would not substantially degrade the existing visual character or quality of public views, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Development facilitated by the Ordinance would generally occur in more rural, residential areas, where existing sources of light and glare may be limited. The Ordinance would facilitate development of single-family units and ADUs in water systems throughout Monterey County, which are already characterized by low-density residential development. Construction of a limited number of additional residences in these

areas would temporarily introduce light or glare from construction equipment and, if required, temporary construction lighting. Residential construction activities are typically conducted during daytime hours and do not generally involve nighttime work. As a result, any construction-related light or glare would be short-term, temporary in nature, and would cease upon completion of construction.

In operation, development facilitated by the Ordinance may introduce minor new sources of light and glare, such as vehicles and vehicle headlights, and exterior lighting. Exterior lighting would be subject to Monterey County Code (MCC) Section 21.63.020, which requires lighting be unobtrusive, fully shielded, directed toward intended areas only, and designed to reduce off-site glare. Local Coastal Program policies similarly mandate dark-sky protection and strict control of nighttime lighting to preserve coastal visual resources. Other new sources of light and glare would be similar to existing sources within water systems, and accordingly, the project would not create light and glare that would adversely affect daytime or nighttime views in the area. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

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

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

Several of the Subject Lots and many water systems are located in areas designated as Farmland and zoned for agricultural use (California Department of Conservation [DOC] 2022a). Many systems also include parcels that are enrolled in a Williamson Act contract (DOC 2022b). As shown in Table 2, Subject Lots are located in areas zoned as Rural Density Residential, Low Density Residential, or Resource Conservation. These zoning designations, as well as other residential or agricultural zones that other water systems are located in, allow single-family units and ADUs regardless of Farmland status. Residential development is already allowed in these areas; the Ordinance would allow alternative and lower-cost water treatment options, thereby removing an economic constraint that could otherwise limit development. The Ordinance itself would not alter zoning designations or modify agricultural land use designations, and would not modify a parcel's Williamson Act contract. Accordingly, the project would not convert Farmland to non-agricultural use, and would not conflict with existing zoning or Williamson Act contracts. No impact would occur.

NO IMPACT

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

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

Forest land is defined as land capable of supporting at least 10 percent native tree cover and providing forest resources such as timber, wildlife habitat, aesthetics, or watershed functions (California Public Resource Code Section 12220). Monterey County's zoning code and General Plan include designations for forest land, timberland, and Timberland Production Zones, and water systems may be located in areas designated as forestland or timberland. The reinstated Ordinance would not alter existing forestry zoning designations. Residential development is already allowed within out-of-compliance water systems, and the Ordinance would allow alternative and lower-cost water treatment options, thereby removing an economic constraint that could otherwise limit development. . Accordingly, development facilitated by the Ordinance would remain subject to Monterey County ordinances and regulations pertaining to forest land, and would not result in the loss of forest land or conversion of forest land to non-forest use.

Development facilitated by the Ordinance may require tree removal. Development would remain subject to MCC Chapter 16.60, which requires appropriate review, avoidance, minimization, or mitigation when native trees may be affected. Because the Ordinance does not modify forest-related zoning or tree-protection requirements, and facilitated development would occur on parcels already zoned for residential uses rather than forest or timberland uses, the project would not result in loss of forest land or conversion of forest land to non-forest uses. No impact would occur.

NO IMPACT

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

The Ordinance changes how water-quality compliance may be achieved for development on lots within out-of-compliance water systems. Although the Ordinance would facilitate additional growth compared to baseline growth, it does not change existing land use designations or development standards, nor does it authorize new subdivisions or infrastructure extensions that would result in the conversion of farmland or forestland to non-agricultural or non-forest use. No impact would occur.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

Air Quality Standards and Attainment

The California Air Resources Board (CARB) coordinates and oversees both state and federal air quality control programs in California. CARB has established 14 air basins statewide, and Monterey County is located in the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). The NCCAB is currently designated as nonattainment for the state particulate matter that is PM_{10} standards and nonattainment-transitional for the state one-hour and eight-hour ozone standards. The NCCAB is designated as attainment for all federal standards and other state standards. MBARD is responsible for enforcing the state and federal air quality standards and regulating stationary sources through the 2015 Air Quality Management Plan (AQMP) for the Monterey Bay Region, adopted on March 15, 2017 (MBARD 2017). Table 4, below, provides a summary of health effects associated with non-attainment criteria air pollutants.

Table 4 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[1]

Pollutant	Adverse Effects
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.

[1] More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: United States Environmental Protection Agency 2026

Air Quality Management

Residential projects that increase population will also generate population-related emissions (e.g., motor vehicles, residential heating and cooling emissions). A project would conflict with or obstruct implementation of the 2015 AQMP for the Monterey Bay Region if it is inconsistent with the plan's growth assumptions, in terms of population, employment, or regional growth in vehicle miles traveled. These population forecasts were developed, in part, using data obtained from local jurisdictions on projected land uses and population projections identified in community plans. Projects that result in an increase in population that is inconsistent with local community plans would be considered inconsistent with the AQMP. MBARD utilizes residential units to determine consistency rather than population because residential units are closely related to population and jurisdictions can track the housing stock in their area. To determine a project's consistency, a project's proposed residential units are compared to the existing and approved residential units within the jurisdiction. If the jurisdiction's residential units, including the project, are less than the forecast in the AQMP, then the project is consistent. If the jurisdiction residential units, including the project, exceed the forecast in the AQMP, then the project is not consistent.

Air Emission Thresholds

The CEQA Guidelines state that the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the significance determinations for project analysis.

MBARD has issued criteria for determining the level of significance for project specific impacts within its jurisdiction in accordance with the above thresholds. Based on criteria applied in or adapted from the MBARD Guidelines, the project's impacts on criteria air pollution would be significant if the project would:

- Be inconsistent with the adopted Air Quality Management Plan.
- During construction:
  - Cause a violation of the particulate matter of 10 microns or less (PM_{10}) Ambient Air Quality Standards (AAQS) nearby or upwind of sensitive receptors, based on whether the project would:
    - Emit greater than 82 pounds per day (lbs/day) of PM_{10} if located nearby or upwind of sensitive receptors (note: projects which require minimal earthmoving on 8.1 or more acres per day or grading and excavation on 2.2 or more acres per day are likely to exceed this threshold); or
    - Use equipment that is not "typical construction equipment" as specified in Section 5.3 of the MBARD CEQA Guidelines.
- During operations:
  - Generate direct (area source or stationary) plus indirect (operational or mobile) emissions of either Reactive Organic Gases (ROG) or Nitrogen Oxides (NO_X) that exceed 137 lbs/day;
  - Generate on-site emissions of PM_{10} exceeding 82 lbs/day;
  - Generate direct emissions of Carbon Monoxide (CO) exceeding 550 lbs/day;

- Generate direct emissions of Sulfur Oxides (SO_X) exceeding 150 lbs/day.
- Cause or substantially contribute to a violation of a CO standard.

Methodology

The analysis of air quality impacts conforms to the methodologies recommended in MBARD's CEQA Air Quality Guidelines. The handbook includes thresholds for emissions associated with both construction and operation of proposed projects.

Construction Emissions

The California Emissions Estimator Model (CalEEMod, version 2022.1.1.37) was used to estimate construction emissions from off-road equipment and fugitive dust generated during construction of development facilitated by the Ordinance. CalEEMod quantifies emissions associated with the use of off-road equipment, on-road worker commute, and construction delivery and haul trucks. Fugitive dust emissions are quantified for grading and site preparation activities/earthwork, truck loading, demolition, and vehicle trips on paved and unpaved surfaces. The program calculates fugitive dust associated with on-site earthwork, including on-site grading and site preparation phases, based on the construction equipment to be used (e.g., crawler tractors, graders, dozers, scrapers), hours of use, and the estimated area of disturbance calculated for each piece of equipment.

Operational Emissions

Operational emissions associated with development facilitated by the Ordinance were estimated using CalEEMod default vehicle trip data provided for residential units. Operational emissions would be comprised of mobile source emissions, emissions associated with energy consumption, and area source emissions. Mobile source emissions are generated by the increase in vehicle trips to and from the project site associated with operation of the project. Emissions attributed to energy use include electricity (although strictly related to greenhouse gas [GHG] emissions) and natural gas consumption for space and water heating and cooling, etc. Area source emissions are generated, for example, by landscape maintenance equipment, consumer products, and architectural coatings. Emissions from the full buildout of development facilitated by the Ordinance (i.e., buildout of 54 single-family units plus 20 ADUs a year over 10 years, for a total of 254 new residences) were calculated and compared to applicable thresholds.

Impact Analysis

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

As discussed above, under Air Quality Management, a project would conflict with or obstruct implementation of the AQMP for the Monterey Bay Region if it is inconsistent with the growth assumptions included in the 2015 AQMP (MBARD 2017). The "project" considered in this Initial Study consists of adoption and implementation of the amended and reinstated Ordinance, which would allow the use of POU and POE water treatment devices in out-of-compliance local small, State small, and public water systems in unincorporated Monterey County.

At full buildout, the Ordinance could facilitate development of approximately 54 new single-family units, plus up to 20 ADUs per year for approximately 10 years. As such, the Ordinance would result in an increase in the County's population. The California Department of Finance estimates the average household size in unincorporated Monterey County is 2.84 persons per dwelling unit (California Department of Finance 2025). Multiplying the 2.84 persons per dwelling unit by the project's 54 new single-family units and 200 ADUs results in an estimated additional population of 722 residents. This analysis conservatively assumes that these residents would be new residents relocating from outside the County.

The 2015 AQMP's population projections are based on regional growth forecasts prepared by the Association of Monterey Bay Area Governments. The population growth projections used in the 2015 AQMP forecast show that the population of Monterey County will reach 495,086 residents by 2035, an increase of 31,202 from 2025 projections (MBARD 2017). The population growth associated with the Ordinance represents approximately two percent of the total population growth expected in Monterey County between 2025 and 2035. Accordingly, development facilitated by the Ordinance would not exceed the 2015 AQMP population growth forecast for the County and would be consistent with the 2015 AQMP. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Although construction emissions are generally temporary, they can nonetheless result in short-term air quality impacts. In particular, fugitive particulate matter (PM) dust emissions are among the pollutants of greatest concern during construction activities. These emissions can cause adverse health effects as well as nuisance conditions, including reduced visibility and the soiling of exposed surfaces. Grading activities are the primary source of fugitive particulate matter dust during construction; however, emission levels vary widely depending on factors such as the intensity and type of construction activity, the number and types of equipment operating, vehicle speeds, local soil characteristics, meteorological conditions, and the extent of earth disturbance (e.g., grading, excavation, and cut-and-fill operations).

Emissions of ozone precursors such as nitrogen oxides (NO_X) and reactive organic gases (ROG) are primarily generated by the operation of off-road construction equipment and mobile sources (i.e., delivery vehicles, construction worker vehicles). Generation of these emissions vary as a function of the types and number of heavy-duty, off-road equipment used and the intensity and frequency of their operation, as well as vehicle trips per day associated with delivery of construction materials, the importing and exporting of soil, vendor trips, and worker commute trips.

The Ordinance would facilitate development of 54 new single-family units and 200 ADUs over approximately 10 years. To provide a conservative analysis, it was assumed that the construction of each residential unit would involve demolition, site-preparation, grading, excavation, paving, and architectural coating. The ozone precursors NO_X and ROG would be emitted by the operation of construction equipment, while PM_{10} (particulate matter with a diameter of 10 microns or less) would be emitted by activities that disturb the soil, such as grading and excavation.

Off-road equipment exhaust emissions, including from non-road engines defined by the United States Environmental Protection Agency (USEPA), were estimated based on emissions factors for individual pieces of construction equipment within CalEEMod, and default values were used to determine the amount of construction equipment that would be operating during construction of each residence. The emissions estimate conservatively assumes that all construction equipment required for development facilitated by the Ordinance would be operating on the same day for a total of eight hours; in reality, development facilitated by the Ordinance would be built out individually and gradually over several years. Emissions estimates also include emissions generated by construction workers traveling to and from each Subject Lot and ADU site, as well as trucks hauling materials to and from each site.

According to MBARD, construction related emissions could result in adverse health risks to nearby sensitive receptors if specified emission thresholds are exceeded, as shown in Table 5 (MBARD 2017). Construction would result in the temporary generation of vehicle and equipment exhaust and fugitive dust for the duration of construction activities. To provide a conservative evaluation of daily construction emissions, this analysis assumed that all 54 single-family units would be developed concurrently, with the 20 ADUs built annually. It was assumed that construction would start in 2027, and that each individual single-family unit and ADU would be constructed over the course of about one year. The 20 ADUs constructed each year beyond 2028 are anticipated to have similar or lesser emissions, as equipment

becomes more efficient and construction emissions would decrease. Estimated construction emissions associated with the project are presented in Table 5.

Table 5 Construction Emissions (pounds/day)

Year of Construction	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Single-Family Units						
2027	1	10	29	<1	9	<1
2028	114	9	14	<1	<1	<1
Accessory Dwelling Units						
2027	4	28	29	<1	9	5
Annually (2028 – 2037)	52	9	13	<1	<1	<1
Maximum Daily Emissions (Total)						
2027	5	38	58	<1	18	5
Annually (2028 – 2037)	166	18	27	<1	1	1
MBARD Threshold	N/A	N/A	N/A	N/A	82	N/A
Threshold Exceeded?	N/A	N/A	N/A	N/A	No	N/A

ROG = reactive organic gases; NOx = nitrogen oxides; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with a diameter of 10 micrometers and smaller; $PM_{2.5}$ = particulate matter with a diameter of 2.5 micrometers and smaller.

See Appendix A for CalEEMod modeling results.

As shown in Table 5, temporary construction emissions would vary by construction phase. During the first modeled year of construction activities (2027), demolition, grading, and initial building construction would generate higher particulate matter and NOx emissions. In subsequent construction phases, emissions profiles would shift, with building coating and paving activities resulting in higher ROG emissions. However, emissions would not exceed MBARD's significance thresholds. As such, construction air quality emissions during project construction would be consistent with the 2015 AQMP. Impacts would be less than significant.

Operational emissions would result from ongoing activities associated with occupancy of the 54 single-family units and 200 ADUs, including vehicle trips generated by residents, visitors, and service providers, as well as electricity and natural gas use for space heating, water heating, cooking, and other household uses. These activities would generate criteria air pollutants and greenhouse gas emissions on a daily basis for the life of the project. Table 6 summarizes the operational emissions from the development facilitated by the Ordinance at full buildout, assuming all 54 single-family units and 200 ADUs have been developed and are in operation.

Table 6 Operational Emissions (pounds/day)

	Estimated Emissions (lbs/day)					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile	6	3	26	<1	6	2
Area	20	4	23	<1	1	1
Energy	<1	2	1	<1	<1	<1
Total Project	**26**	**9**	**50**	**<1**	**8**	**3**
MBARD Threshold	137	137	550	150	82	N/A
Threshold Exceeded?	No	No	No	No	No	N/A

ROG = reactive organic gases; NOx = nitrogen oxides; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with a diameter of 10 micrometers and smaller; $PM_{2.5}$ = particulate matter with a diameter of 2.5 micrometers and smaller.

See Appendix A for CalEEMod modeling results.

As shown in Table 6, operational emissions would not exceed the applicable MBARD thresholds for any of the criteria pollutants. Therefore, the operation of development facilitated by the Ordinance would be consistent with the 2015 AQMP, and overall, the Ordinance would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Construction Dust Emissions

Because the Ordinance would facilitate development on parcels located within out-of-compliance water systems where existing residences are present, it is assumed that development facilitated by the project would be constructed in close proximity to existing residences. MBARD recommends evaluating potential air quality impacts to sensitive receptors located within 1,000 feet of a project site. As discussed under impact (b) above, the maximum daily PM_{10} emissions associated with project construction would not exceed MBARD's significance threshold of 82 pounds per day. In addition, the PM_{10} emission estimates do not account for compliance with MBARD Rule 400 (Visible Emissions), Rule 425 (Use of Cutback Asphalt), and Rule 426 (Architectural Coatings). Compliance with these rules would further reduce particulate emissions by minimizing visible dust, limiting overspray and volatilization of coating materials that could otherwise become aerosolized, and reducing ROG emissions through limits on the volatile organic compound (VOC) content of architectural coatings used during construction (MBARD 2020). Therefore, construction-related emissions would not expose nearby sensitive receptors to substantial pollutant concentrations. Impacts associated with construction dust would be less than significant.

Short-Term Construction Toxic Air Contaminants

Construction of development facilitated by the Ordinance would result in the temporary emission of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment during site preparation, demolition, grading, building construction, and other construction activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998 (MBARD 2020; CARB 2024).

Generation of DPM from construction projects typically occurs in a single area for a short period. Project construction would involve the use of heavy construction equipment incrementally over approximately 10 years. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be averaged over a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project, and should reflect localized risks to these sensitive receptors based on activity location and distance (California Office of Environmental Health Hazard Assessment 2026).

Although construction of development facilitated by the Ordinance would occur over an approximately 10-year period, which represents about 33 percent of the 30-year exposure duration typically used in health risk assessments, construction would take place intermittently at varying locations throughout unincorporated Monterey County and during different years and months. As a result, construction-related emissions would not occur continuously at any single location, and no individual sensitive receptor would experience sustained exposure at levels that could result in a significant health impact. If an individual development project facilitated by the Ordinance is determined to have the potential to result in a significant health impact, the County of Monterey would require the preparation of a health risk assessment as part of the project's planning and permitting process.

Current models and methodologies used to evaluate health risks are based on long-term exposure durations of 9, 30, and 70 years. These exposure periods do not correspond well with the temporary, intermittent, and location-specific nature of construction activities, which makes it difficult to generate accurate estimates of construction-related health risk (Bay Area Air District 2023). In addition, construction DPM would be reduced through the use of control measures such as USEPA-compliant construction equipment equipped with Tier 4 engines, which emit substantially lower levels of DPM compared to older engines. With the use of Tier 4 equipment, DPM generated during project construction is not anticipated to result in an excess cancer risk greater than ten in one million for the Maximally Exposed Individual, nor to produce ground-level concentrations of non-carcinogenic toxic air contaminants that would result in a Hazard Index greater than one for the Maximally Exposed Individual. Therefore, construction activities would not expose sensitive receptors to substantial toxic air contaminant concentrations. Impacts would be less than significant.

Operational Toxic Air Contaminants

DPM would be emitted from diesel-fueled off-road equipment, including equipment used during landscaping, and by project-generated traffic (on-road diesel vehicles) within the vicinity of each development site. The particulate matter component of diesel exhaust has been classified as a TAC by CARB based on its potential to cause cancer and other adverse health effects. Urban roads with traffic volumes exceeding 100,000 vehicles per day or rural roads with volumes greater than 50,000 vehicles per day are potentially hazardous sources of TACs within 500 feet of a sensitive receptor (CARB 2017). Because the water systems that the Ordinance would apply to are generally located in rural or suburban areas, roadways near the Subject Lots and other potential development sites do not have traffic volumes that exceed these thresholds (see Environmental Checklist Section 17, *Transportation*). Therefore, each individual development site would not be located near any major sources of TACs, and the Ordinance would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Carbon Monoxide Hotspots

Areas with high vehicle density, such as congested intersections and parking garages, have the potential to create high concentrations of CO, known as CO “hot spots,” which can expose sensitive receptors to substantial pollutant concentrations. Specifically, hot spots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal AAQS of 35.0 parts per million (ppm) or the state AAQS of 20.0 ppm.

According to the MBARD CEQA Air Quality Guidelines, a local CO hotspot analysis should be conducted if:

- Intersections or road segments that operate at Level of Service (LOS) D or better would operate at LOS E or F with the project’s traffic,
- Intersections or road segments that operate at LOS E or F where the volume-to-capacity ratio would increase 0.05 or more with the project’s traffic,
- Intersections that operate at LOS E or F where delay would increase by 10 seconds or more with the project’s traffic,
- Unsignalized intersections which operate at LOS E or F where the reserve capacity would decrease by 50 or more with the project’s traffic,
- The project would generate substantial heavy duty traffic or generate substantial traffic along urban street canyons or near a major stationary source of CO.

As further described in Environmental Checklist Section 17, *Transportation*, the Ordinance would facilitate the development of 54 single-family units and 20 ADUs per year over an approximately 10-year period, and would not generate substantial heavy duty truck traffic or generate substantial traffic along urban street canyons or near major stationary sources of CO. Although the development facilitated by the Ordinance would add vehicle trips to roadway segments serving applicable water systems, only a few

residences would be added to each out-of-compliance water system, which would not substantially affect LOS or the volume-to-capacity ratio or delay substantially enough to warrant a CO hotspot analysis. As such, CO hotspot impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Construction of development facilitated by the Ordinance would generate temporary odors from vehicle exhaust and equipment exhaust. However, construction-related odors would disperse and dissipate and would not cause substantial odors at the closest sensitive receptors. Contractors would be required to comply with the provisions of California Code of Regulations (CCR) Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes to minimize unnecessary fuel consumption, which would limit exhaust fumes. In addition, construction-related odors would be temporary and would cease upon completion of construction. During operation, the proposed residences would not be expected to produce other emissions that would result in odors. Therefore, development facilitated by the Ordinance would not result in other emissions, such as those leading to odors, that could adversely affect a substantial number of people. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

4 Biological Resources

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

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

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

c. *Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The Ordinance would facilitate development of a relatively small number of residences throughout Monterey County. Residential development is already allowed in these areas; the Ordinance would allow alternative and lower-cost water treatment options, thereby removing an economic constraint that could otherwise limit development. Further, the Subject Lots and other water systems in which development would occur are located in rural or low-density residential areas, make the presence of intact habitat and

sensitive natural communities less likely. However, it is possible that development facilitated by the Ordinance could be located in sensitive natural communities, riparian habitat, wetlands, or in areas that provide habitat for special status species.

Development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development permits. The planning review process would consider an individual project's consistency with County plans and regulations that pertain to biological resources, including General Plan policies, Local Coastal Program policies, ordinances related to biological resources, and state and federal laws, including but not limited to CEQA. As individual development is proposed in the Subject Lots or within other water systems, the County would review each site for the potential for special status species, sensitive communities, riparian areas, and wetlands to occur in an individual site. If any such resources are located within a proposed development site, the County would require further site-specific biological resources assessments and conditions of approval intended to avoid and minimize impacts.

The Ordinance itself does not include any specific development projects, and it would not directly authorize construction of new, previously unallowed development; it would facilitate the development residences in out-of-compliance water systems by making alternative water treatment options available. Individual projects made feasible by the Ordinance would continue to be subject to applicable County general plan policies, zoning regulations, and other laws pertaining to special-status species, riparian habitat, wetlands, or other sensitive natural communities. Accordingly, implementation of the Ordinance would not have a substantial adverse effect on special status species, riparian habitat, wetlands, or sensitive natural communities, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The Ordinance would facilitate the development of housing in rural and low density residential areas, where wildlife movement is already influenced by existing roads, property boundaries, and structures. As described above, the Ordinance itself does not include any specific development projects, and it does not directly authorize construction of new, previously unallowed development; it would facilitate the development residences in out-of-compliance water systems by making alternative, lower-cost water treatment options available.

As described above, individual development in Subject Lots or other water systems would continue to be subject to the County's planning review process, which would consider the project's consistency with County plans and regulations that pertain to biological resources, including wildlife corridors. Biological review conducted for individual projects made feasible by the Ordinance would continue to assess site-specific conditions, including the presence of suitable habitat, known or potential wildlife movement patterns, and sensitive biological resources. Where necessary, project-level conditions of approval, avoidance measures, or setbacks would be imposed to avoid or minimize potential effects. Development would occur incrementally, within an already fragmented landscape, and would not interfere with established wildlife corridors. Therefore, the Ordinance would not substantially interfere with wildlife movement or the use of wildlife nursery sites, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The Ordinance would not authorize new or previously unallowed development; it would facilitate development of residences in out-of-compliance water systems within existing parcels zoned for residential development by making alternative and lower-cost water treatment options available. The Ordinance would not modify or alter the implementation of County policies and regulations that pertain to biological resources, including General Plan and Local Coastal Program policies or zoning regulations. If individual development projects facilitated by the Ordinance require tree removal, development would remain subject to MCC Chapter 16.60, which requires appropriate review, avoidance, minimization, or mitigation when native trees may be affected. Therefore, the Ordinance would not conflict with local policies or ordinances protecting biological resources, and no impact would occur.

NO IMPACT

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

The Ordinance would not authorize new or previously unallowed development; it would facilitate development of residences in out-of-compliance water systems within existing parcels zoned for residential development by making alternative water treatment options available. Therefore, the Ordinance would not conflict with the provisions of a previously adopted habitat or conversation plan. No impact would occur.

NO IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	■	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	■	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	■

CEQA requires a lead agency to determine whether a project may have a significant effect on historical resources (Public Resources Code [PRC] Section 21084.1). A historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources; a resource included in a local register of historical resources; or any object, building, structure, site, area, place, record, or manuscript a lead agency determines to be historically significant (CEQA Guidelines Section 15064.5[a][1-3]).

To more clearly differentiate between archaeological and built environment resources, the analysis under threshold (a) is limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to CEQA Guidelines Section 15064.5 and those that may be considered unique archaeological resources pursuant to PRC Section 21083.2, are considered under threshold (b).

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

The Ordinance would allow alternative and lower-cost water treatment options, and accordingly, would facilitate development in vacant lots where development may otherwise be infeasible or cost prohibitive due to the failing centralized water treatment system. Therefore, it is assumed that development facilitated by the Ordinance would generally occur in vacant parcels, and would not require demolition. Further, development facilitated by the Ordinance would be subject to Monterey County's planning review process, which would consider if the project is consistent with General Plan policies and ordinances that pertain to the preservation of historic resources. If future development facilitated by the Ordinance as the potential to adversely affect a historic resource, it would be subject to MCC Chapter 18.25, which outlines regulations for the protection, enhancement, and preservation of historic resources. Accordingly, the Ordinance would not cause a substantial adverse change in the significance of a historical resource. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

As discussed above, it is assumed that development facilitated by the Ordinance would generally occur in vacant parcels, which would have low levels of previous disturbance. Therefore, development in these sites could encounter unknown archaeological resources during construction. Development facilitated by the Ordinance would be subject to Monterey County's planning review process, which would consider if the project is consistent with General Plan policies and ordinances pertaining to archaeological

resources. As part of its review, the County would also consider if proposed development is located in an archaeologically sensitive area. If it is determined that the project may affect an archaeological resource, the County would require further site-specific archaeological resources assessments and conditions of approval intended to avoid and minimize impacts. Conditions of approval would require the project proponent to retain an on-call archeological monitor, who shall review and evaluate any inadvertent discoveries to determine if they are historical resource(s) and/or unique archaeological resources or tribal cultural resources under CEQA, If the find constitutes such a resource, the archaeological monitor shall recommend mitigation measures to mitigate to a less-than-significant impact in accordance with PRC Section 15064.5, including but not limited to a Cultural Resources Protection and Management Plan and conduct additional testing to determine the resources' boundaries, if needed.. Accordingly, the Ordinance would not cause a substantial adverse change in the significance of an archaeological resource, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

If human remains are encountered during construction activities associated with development facilitated by the Ordinance, all work in the vicinity would be required to cease immediately in accordance with California Health and Safety Code Section 7050.5. The County Coroner would then determine the origin and appropriate disposition of the remains pursuant to Public Resources Code Section 5097.98. These requirements have been incorporated into standard County conditions of approval. With compliance with these regulations, development facilitated by the Ordinance would not result in substantial impacts associated with the disturbance of human remains. No impact would occur.

NO IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	■	☐

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

Construction of development facilitated by the Ordinance would involve typical activities such as site preparation and grading, building construction, utility installation, paving, and landscaping. Construction-related energy use would consist primarily of petroleum-based fuels for construction equipment, material delivery vehicles, and worker commutes. This energy use would occur intermittently over an approximately 10-year period and would be temporary in nature, and construction equipment and activities would be comparable to those of similar residential projects in the area. Construction of development facilitated by the Ordinance would be required to comply with CCR Title 13 Sections 2449 and 2485, which limit diesel vehicle idling to five minutes, and with USEPA construction equipment fuel efficiency standards. Additionally, future construction would comply with the current California Green Building Standards Code (CALGreen), which requires diversion of at least 65 percent of construction debris. Therefore, construction facilitated by the Ordinance would not involve the wasteful, inefficient, or unnecessary use of energy, and construction-related energy impacts would be less than significant.

Operation of development facilitated by the Ordinance would increase regional energy demand through the use of electricity, natural gas, gasoline, and diesel fuel for residential energy needs and vehicle travel. Electricity would be used for lighting, appliances, cooling, and water and wastewater conveyance, while natural gas would primarily be used for heating and cooking. Development would be required to comply with the latest California Building Standards Code (CCR Title 24), including CALGreen and the 2025 Building Energy Efficiency Standards (Title 24, Part 6), which mandate energy-efficient building materials and systems, solar photovoltaic installation for single-family residences (unless exempt), electric vehicle charging infrastructure, bicycle parking, water-efficient fixtures, and other energy-saving measures. These standards are designed to minimize inefficient or unnecessary energy consumption in new development. Accordingly, operation of development facilitated by the Ordinance would not result in wasteful, inefficient, or unnecessary use of energy, and operational energy impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The County has not adopted a specific renewable energy or energy efficiency plan. However, the County's General Plan Conservation and Open Space Element contains the following applicable policies related to energy (County of Monterey 2010):

Energy Resources Goal OS-9. Promote efficient energy use.

Policy OS-9.1. The use of solar, wind and other renewable resources for agricultural, residential, commercial, industrial, and public building applications shall be encouraged.

Policy OS-9.2. Development shall be directed toward cities, Community Areas, and Rural Centers where energy expended for transportation and provision of services can be minimized.

Policy OS-9.4. Lots shall be oriented to maximize the energy gains from solar and/or wind resources in order to minimize energy losses where possible.

As described under threshold (a), development facilitated by the Ordinance would comply with the current Building Energy Efficiency Standards and the 2025 California Energy Code, which require energy-efficient building systems, renewable energy integration, and smart energy management measures to reduce overall residential energy consumption. Development facilitated by the Ordinance would incorporate solar-ready infrastructure and design features to support efficient rooftop solar installation, consistent with the County's General Plan Conservation and Open Space Element Energy Resources Goal OS-9 and Policies OS-9.1 and OS-9.4. In addition, by allowing the use of alternative water treatment systems, the Ordinance would facilitate residential development in areas where residential uses are already allowed and anticipated, and water systems already exist, which would support Policy OS-9.2. Accordingly, the Ordinance would not conflict with or obstruct applicable state or local plans for renewable energy or energy efficiency, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

7 Geology and Soils



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

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

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

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

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

Monterey County and the Central Coast region of California is known to be a seismically active area. Several faults are present in the County, including the San Andreas Fault, and the risk of liquefaction, landslides, and other geologic hazards varies throughout the County based on topography, soil types, and other conditions.

The Ordinance would facilitate development of a relatively small number of residences throughout Monterey County. Residential development is already allowed in these areas; the Ordinance would allow alternative and lower-cost water treatment options, thereby removing an economic constraint that could otherwise limit development. Accordingly, development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development. This review process would identify geologic hazards present in each individual development site. Further, development facilitated by the project would be required to comply with the California Building Code (CBC), which requires new residences to be designed based on site-specific seismic parameters, including Seismic Design Category and soil conditions, and to incorporate engineered structural systems capable of safely resisting anticipated earthquake forces. These requirements include, but are not limited to, minimum lateral force–resisting systems, foundation design standards, anchorage of structures to foundations, and prescriptive or engineered detailing for walls, floors, and roofs. Adherence to the CBC would therefore ensure that new residences are designed and constructed to reduce the potential for seismic damage and to protect public safety.

Development facilitated by the Ordinance would also be required to comply with existing MCC provisions that regulate grading, erosion control, and building construction. Title 16, Chapter 16.08 (Grading) requires discretionary review and permitting of grading activities and establishes standards for slope stability, excavation, fills, and inspections to reduce the risk of landslides and soil instability. Compliance with existing state and local regulations would ensure that site-specific geologic and seismic hazards are identified and adequately addressed during individual project design and construction, and would minimize the potential for geologic instability and related risks. Therefore, the Ordinance would not cause potential substantial adverse effects related to fault rupture, seismic ground shaking, liquefaction, or landslides, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Development facilitated by the Ordinance would continue to be subject to MCC Chapter 16.12, which requires implementation of erosion control measures and runoff management to prevent accelerated erosion, soil loss, and downstream sedimentation that could exacerbate slope instability or damage adjacent properties and resources, particularly during storm events. Control measures would include appropriate best management practices such as temporary drainage controls, construction-phase sediment fencing, and soil stabilization. The small-scale nature of single-family units and ADUs facilitated by the Ordinance is not expected to generate substantial erosion, and any site-specific grading would remain governed by County regulations. Therefore, the Ordinance would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

As discussed above, the Ordinance would facilitate development of a relatively small number of residences throughout Monterey County. Residential development is already allowed in these areas; the Ordinance would only allow alternative and lower-cost water treatment options. Development would continue to be reviewed by County's Housing and Community Development Department and other departments as necessary, which may require preparation of a site-specific geotechnical report if a

particular site may be located on an unstable soil unit. Further, development in the Subject Lots and within other water systems would continue to be subject to MCC Chapter 16.08 (Grading), Chapter 16.12 (Erosion Control), and other County regulations related to unstable soil hazards, and the CBC, which requires foundations and structures to be designed to withstand site-specific geologic conditions. Therefore, the Ordinance would not result in hazards related to landslide, lateral spreading, subsidence, liquefaction, and collapse, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development. This review process would identify geologic hazards present in each individual development site, which could include expansive soils. This review process may require preparation of a site-specific geotechnical report if a particular site may be located on expansive soils. If expansive soils are identified, compliance with the CBC's foundation design requirements, as well as geotechnical measures (e.g., engineered slabs, soil compaction, moisture control) recommended in site-specific geotechnical reports, would ensure that potential risks are minimized. Accordingly, the Ordinance would not result in substantial direct or indirect risks to life or property related to expansive soils, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The Ordinance would allow the use of POU or POE (potable) water treatment devices and would not modify existing regulations pertaining to wastewater treatment devices. If development facilitated by the Ordinance would use septic tanks or alternative wastewater disposal systems, development would remain subject to existing requirements regulating the installation and use of such systems, including MCC Chapter 15.20 (Sewage Disposal), and would require approval by the County Health Department. Chapter 15.20 regulates the siting, design, installation, operation, monitoring, and maintenance of on-site wastewater treatment systems to ensure that wastewater is adequately treated and disposed of in a manner protective of public health and water quality. These requirements include, but are not limited to, evaluation of site-specific soil conditions, groundwater depth and separation requirements, system sizing based on projected wastewater flows, setbacks from wells, surface waters, and drainage features, and ongoing maintenance obligations to ensure long-term system performance. These requirements ensure that site soils are capable of supporting septic systems or alternative wastewater disposal systems. The Ordinance does not modify these standards or allow development in areas where septic systems cannot be supported. Because septic system feasibility is determined at the project level and must meet all existing Health Department and County Code requirements before approval, the Ordinance would not result in development on soils incapable of supporting septic systems. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Several areas located throughout the County are known to be sensitive for paleontological resources. Development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development. Part of this review process includes evaluating the site's sensitivity for paleontological resources. If a

particular development site overlies a geologic unit with high paleontological sensitivity, the development would be subject to standard Monterey County conditions of approval, which could include but would not be limited to work stoppage and evaluation by a qualified paleontologist if subsurface fossil material is uncovered during construction. These procedures comply with State requirements and ensure appropriate protection and treatment of paleontological resources. Therefore, the Ordinance would not result in the destruction of a unique paleontological resource or sire or unique geologic feature, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

The majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence on climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. According to the CEQA Guidelines Section 15355, "cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.

The County does not currently have an adopted GHG reduction plan with numerical reduction targets for individual uses and developments. The County is in the process of developing a Community Climate Action and Adaptation Plan (CCAAP) to reduce GHG emissions within the unincorporated County area. In October 2024, a Final Greenhouse Gas Emissions Inventory Report was prepared for the County's CCAAP (County of Monterey 2024). The CCAAP has not yet been approved or adopted; however, it is intended to align with the requirements of the General Plan, as well as State mandates, and will serve to reduce GHG emissions for target years 2030 and 2045. The long-term target year of 2045 was chosen to align with the statewide carbon neutrality goal expressed in Executive Order B-55-18.

Since MBARD has not adopted thresholds, the County uses consistency with applicable plans for the reduction of GHG emissions as the threshold for project significance.

Impact Analysis

a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Construction Emissions

As discussed in Environmental Checklist Section 3, *Air Quality,* construction emissions were estimated using CalEEMod. The project would facilitate development of 54 new single-family units and 200 ADUs over approximately 10 years. To provide a conservative analysis, it was assumed that the construction of each residential unit would involve demolition, site-preparation, grading, excavation, paving, and architectural coating, and that construction of all residences would occur in a single year. This is a conservative assumption because development facilitated by the Ordinance would occur more gradually over several years. CalEEMod modeling outputs are included in Appendix A. Under these assumptions, development facilitated by the Ordinance would generate approximately 4,140 metric tons (MT) of carbon dioxide (CO_2) or carbon dioxide equivalents (CO_2e), as shown in Table 7. This total includes CO_2 and methane (CH_4) emissions, which are combined using standard global warming potential conversions. When amortized over a 30-year project lifespan, construction-related emissions would equal

approximately 138 MT CO_2e per year (*see* Appendix A for CalEEMod calculations). Construction emissions are provided for informational purposes only.

Table 7 Estimated Annual Construction GHG Emissions

Year of Construction	Annual Emissions (MT CO_2e)
Single Family Housing	
2027	383
2028	137
Accessory Dwelling Units (ADUs) - Annual[1]	
2027	321
2028	41
ADUs – Project Buildout[2]	
Years 1 - 10	3,620
Total Construction[3]	**4,140**
Amortized Over 30-Years	138 MT CO_2e

MT CO_2e = metric tons of carbon dioxide equivalents.

[1] Represents annual emissions, assuming 20 ADUs would be constructed per year.

[2] Represents emissions from construction of all 200 ADUs. It is anticipated that 20 ADUs would be constructed annually over the course of 10 years. As such, "ADUs – Project Buildout" was calculated by multiplying "ADUs – Annual" emissions values by 10.

[3] Represents the total project buildout of the ADUs and the single family housing.

See Appendix A for CalEEMod worksheets.

Operational Emissions

Operational GHG emissions were calculated using default assumptions for area source emissions, energy emissions, mobile source emissions, waste generation, and water use associated with residential development. It is estimated that project operational emissions would total approximately 2,092 MT CO_2e per year, with a total (including amortized construction emissions) of 2,230 MT CO_2e per year. The CalEEMod operational emissions are summarized below in Table 8. Operational emissions are provided for informational purposes only.

Table 8 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2e in metric tons)[1]
Construction	138
Operational	
Mobile	956
Area	382
Energy	656
Water	34
Waste	63
Refrigerants	<1
Operational Total	2,092
Project Total (with amortized GHG)	**2,230**

CO_2e = carbon dioxide equivalents; GHG = greenhouse gas

[1] Numbers may not add directly due to rounding.

See Appendix A for CalEEMod worksheets.

The County has not adopted a specific renewable energy or energy efficiency plan (County of Monterey 2024). However, the following plans, policies, or regulations adopted for the purpose of reducing GHG emissions are applicable to the project.

Monterey Bay Air Resources District Air Quality Management Plan

Compliance with the 2015 AQMP is demonstrated under Environmental Checklist Section 3, *Air Quality,* impact (a) through impact (c). As described therein, the Ordinance would not result in population growth that would exceed the 2015 AQMP forecast, nor would the Ordinance result in emissions exceeding MBARD criteria pollutant thresholds or utilize construction equipment that is not accounted for within the CalEEMod model. Therefore, the Ordinance would not conflict with or obstruct implementation of the applicable air quality plan (the 2015 AQMP).

Association of Monterey Bay Area Governments Metropolitan Transportation Plan/Sustainable Communities Strategy

The Association of Monterey Bay Area Governments (AMBAG) adopted the Sustainable Communities Strategy (SCS) as part of the 2045 Metropolitan Transportation Plan (MTP) in June 2022.[5] The MTP serves as the long-range plan for the region, identifying transportation needs, investment priorities, and policy frameworks for local governments to foster sustainable development, including meeting the SB 375 GHG emissions reduction target of five percent below 2005 per capita GHG emissions by 2035. As part of meeting these reductions, AMBAG has an overall goal to assure that the region is EV ready. Emissions inventories are determined based on the AMBAG population growth forecasting to determine whether a project meets the SB 375 goals in the MTP/SCS. As described in Environmental Checklist Section 3, *Air Quality,* the Ordinance would not generate a population that exceeds the AMBAG population growth projections used in the 2015 AQMP, and as described below in Environmental Checklist Section 14, *Population and Housing,* the Ordinance would not generate a population that exceeds current AMBAG population forecasts. Further, development facilitated by the Ordinance would be required to comply with the latest iteration of the CBC, which would require EV infrastructure and solar-readiness at new residences. Therefore, the Ordinance would be consistent with AMBAG's MTP/SCS.

Monterey County 2010 General Plan

The County does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. However, the County's General Plan Conservation and Open Space Element contains the following applicable policies related to reducing GHG emissions through renewable energy sources (County of Monterey 2010).

> Policy OS-9.1. The use of solar, wind and other renewable resources for agricultural, residential, commercial, industrial, and public building applications shall be encouraged.
>
> Policy OS-9.4. Lots shall be oriented to maximize the energy gains from solar and/or wind resources in order to minimize energy losses where possible.
>
> Policy OS-9.6. Development shall incorporate features that reduce energy used for transportation, including pedestrian and bicycle pathways, access to transit, and roadway design as appropriate.

As described under Environmental Checklist Section 6, *Energy*, development facilitated by the Ordinance would meet the requirements of the current Building Energy Efficiency Standards and the current California Energy Code, which require efficient mechanical and lighting systems, and the integration of renewable energy and smart energy management measures to reduce overall energy consumption and

[5] AMBAG is currently drafting *Connect Monterey Bay 2050,* which once approved, would become the latest MTP/SCS and long range transportation plan for the Monterey Bay region. At the time of this analysis, the 2050 MTP/SCS has not been formally adopted. As such, the 2045 MTP/SCS is used.

thereby reduce GHG emissions (California Energy Commission 2026). Development facilitated by the Ordinance would comply with the CBC and would include solar panels or solar-ready infrastructure on proposed residential units, thereby complying with the County's General Plan Conservation and Open Space Element Policies OS-9.1 and OS-9.4, described above. Additionally, per 2025 CALGreen requirements, mandatory EV charging infrastructure would be provided as part of the project design. As such, the Ordinance would comply with the County's General Plan Conservation and Open Space Element Policy OS-9.6.

California Air Resources Board 2022 Scoping Plan Update

MBARD has not established quantitative thresholds of significance for GHG emissions to evaluate consistency with CARB's 2022 Scoping Plan Update and the State's goal of achieving carbon neutrality by 2045, nor has the County of Monterey adopted a qualified CAP with enforceable GHG reduction measures. Nevertheless, development facilitated by the Ordinance would be required to comply with the mandatory provisions of the current CALGreen Standards, including requirements for EV charging infrastructure and minimum on-site solar systems. Compliance with CALGreen would reduce both transportation- and energy-related GHG emissions over the operational life of future development. Although limited on-site natural gas use may occur during initial operational years, increased building efficiency, on-site renewable energy generation, and expanded EV charging capacity would help offset these emissions. In addition, statewide policies and market trends supporting electrification and reduced reliance on natural gas appliances are expected to further decrease on-site combustion-related GHG emissions over time as equipment is replaced. Accordingly, development facilitated by the Ordinance would be consistent with the GHG reduction framework established by the 2022 Scoping Plan Update, and GHG impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☐	■
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	■	☐

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

b. *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Development facilitated by the Ordinance would involve construction or operational activities typical of residential development, and would not use or store hazardous materials beyond typical residential quantities (e.g., household cleaners, paints). Future development would be required to comply with State and federal laws regulating hazardous materials, including but not limited to the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, California Hazardous Material Management Act, and the California Code of Regulations Title 22. Therefore, the Ordinance would not create a significant hazard to the public or the environment through the transport, use, disposal, or release of hazardous materials, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Development facilitated by the Ordinance would generally be located in more rural areas and would not be proximate to schools. Further, the construction and operation of residences facilitated by the Ordinance would not be anticipated to result in hazardous emissions or use acutely hazardous materials. No impact would occur.

NO IMPACT

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

The Ordinance would facilitate development in residential areas, where residential uses are currently present and additional residential development is planned and anticipated. There are generally fewer hazardous material sites in rural residential areas, and it is not anticipated that development facilitated by the Ordinance would be located on or near a hazardous materials site included on a list compiled pursuant to Government Code Section 65962.5. Nonetheless, development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development permits. If an individual project site is on or near a listed hazardous materials site, the County would require conditions of approval to address potential risks associated with hazardous materials. These conditions could include site-specific environmental assessments, soil and groundwater testing, implementation of remediation or mitigation measures, preparation of a health and safety plan, and/or restrictions on site disturbance. If necessary, applicable regulatory agencies such as the County Health Department, the California Department of Toxic Substances Control, the Regional Water Quality Control Board, the CalEPA Certified Unified Program Agency, or other agencies would oversee site testing and remediation activities to ensure compliance with state and federal hazardous materials regulations. Compliance with these requirements would ensure that any potential contamination is appropriately evaluated and managed prior to or during development. Therefore, the Ordinance would not create a significant hazard to the public or the environment related to listed hazardous materials sites, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The nearest airport to the nearest Subject Lot is Monterey Regional Airport, which is located over two miles to the east. According to the Monterey Regional Airport Land Use Compatibility Plan (County of Monterey 2019) the nearest Subject Lot would not be located within the airport's land use planning boundaries. Therefore, the Ordinance would not result in an aircraft safety hazard or excessive aircraft noise for people residing or working in the project area, and no impact would occur.

NO IMPACT

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

The Ordinance would facilitate development in areas where residential growth is already planned and anticipated. The addition of a few residences to each water system would not result in substantial traffic congestion or inhibit access for emergency response or evacuation. The Monterey County's Emergency Operations Plan, which establishes the overall framework for coordinated emergency response, evacuation, and recovery activities among County departments, local jurisdictions, special districts, and state and federal agencies, would remain applicable to development facilitated by the Ordinance. Therefore, development facilitated by the Ordinance would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Environmental Checklist Section 20, *Wildfire,* discusses potential impacts related to wildfire in more detail. As discussed therein, although some development may be located in wildfire hazard zones, the Ordinance would not substantially affect the risk of loss, injury, or death involving wildland fires, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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10 Hydrology and Water Quality

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

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

Development facilitated by the Ordinance would be subject to MCC regulations that pertain to water quality. Specifically, MCC Chapter 16.08 (Grading) regulates excavation and earthwork activities and typically requires engineered grading plans and geotechnical review where development would create slopes steeper than a 2:1 horizontal-to-vertical ratio or cut slopes greater than five feet. These requirements are intended to minimize slope instability, erosion, and sediment transport that could otherwise result in the discharge of sediment to surface waters. In addition, Chapter 16.12 (Erosion Control) requires the preparation and implementation of erosion and sediment control measures during construction, including best management practices to prevent sediment-laden runoff from leaving the project site. Erosion and sediment control measures would include, but would not be limited to, limiting the extent and duration of soil disturbance; installation of silt fences, fiber rolls, or gravel bag barriers along downslope perimeters; use of temporary erosion control blankets or mulch on exposed soils; stabilization of construction entrances to reduce sediment tracking; protection of storm drain inlets;

implementation of sediment traps or basins where appropriate; and proper containment and management of construction materials, fuels, and concrete washout areas. Compliance with these regulations would reduce the potential for erosion, sedimentation, and pollutant discharges, thereby minimizing the risk of violating water quality standards or waste discharge requirements and avoiding substantial degradation of surface or groundwater quality.

Future development would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development permits. The planning review process would consider an individual project's consistency with County plans and regulations that pertain to water quality, including General Plan policies, Local Coastal Program policies, ordinances related to water quality, and state and federal laws, including but not limited to CEQA. This review would identify site-specific components that may impact surface or ground water quality. If development facilitated by the Ordinance intends to use septic or alternative wastewater treatment, this would be subject to the County's planning review process and Chapter 15.20, Sewage Disposal, of the MCC. Chapter 15.20 regulates on-site wastewater treatment systems and requires the proper design, placement, installation, maintenance, and evaluation of individual systems. These requirements include, but are not limited to, evaluation of site-specific soil conditions, groundwater depth and separation requirements, system sizing based on projected wastewater flows, setbacks from wells, surface waters, and drainage features, and ongoing maintenance obligations to ensure long-term system performance. Compliance with these requirements would minimize the risk of system failure or contamination. Therefore, development facilitated by the Ordinance would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The Ordinance would facilitate development of a limited number of residences throughout Monterey County by allowing an alternative water treatment option within existing, noncompliant water systems. Residential development is already allowed and anticipated in these areas. The Ordinance would allow the use of POU or POE treatment devices for individual developments, whereas only centralized treatment systems are currently allowed. By authorizing these alternative, lower-cost treatment methods, the Ordinance would remove one existing constraint to development, However, it would not increase water availability or result in greater water consumption beyond what is already anticipated under existing regulations. Activation of connections or approval of individual units remains subject to EHB review for water system adequacy, and adequate water supply would be verified as part of review of each individual development application. The County would not approve a new residence or ADU in a shared well system unless adequate water supply is demonstrated. Therefore, development facilitated by the Ordinance would not substantially decrease groundwater supplies.

Development facilitated by the Ordinance would involve construction of single-family and ADUs, which, when considering total development throughout Monterey County, would negligibly increase impervious surface areas and would not substantially interfere with groundwater recharge. Development would continue to be subject to MCC Chapter 16.14, Urban Stormwater Quality Management and Discharge Control, which regulates stormwater discharges from development to protect surface water and groundwater quality by prohibiting non-stormwater discharges and requiring implementation of best management practices. Compliance with this ordinance, in combination with grading and erosion control requirements, would reduce the potential for construction- and operation-related runoff to violate either water quality standards or waste discharge requirements. Development facilitated by the Ordinance would not substantially decrease groundwater supplies or interfere with groundwater recharge. Impacts would be less than significant

LESS-THAN-SIGNIFICANT IMPACT

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

The Ordinance would facilitate development on parcels where residential uses are already planned and allowed by removing a constraint to development by authorizing alternative, lower-cost water treatment options. Most parcels where development could occur are presently suitable for residential use. Such development is unlikely to result in the alteration of a stream or river, flooding, or flood flows. Development facilitated by the Ordinance would not have significant impacts on either impervious surface areas or drainage patterns. Regardless, development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development permits. The planning review process would consider an individual project's consistency with County plans and regulations that pertain to on-site hydrology and drainage, including General Plan policies, Local Coastal Program policies, ordinances related to hydrology and drainage, and state and federal laws, including but not limited to CEQA. As individual development is proposed for the Subject Lots and/or within other water systems, the County would review each site for drainage impacts. If a site has particular drainage impacts, the County would require further site-specific runoff controls and conditions of approval to avoid and minimize impacts. Development would continue to be subject to MCC Chapter 16.14, Urban Stormwater Quality Management and Discharge Control, which regulates stormwater discharges from development to protect surface water and groundwater quality by prohibiting non-stormwater discharges and requiring implementation of best management practices. Accordingly, development facilitated by the Ordinance would not substantially alter the existing drainage pattern of the site or area. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

As shown in Figure 2, most water systems with Subject Lots are located in inland areas of the County and would not be subject to flood or tsunami risk from the Pacific Ocean. Subject Lot Number 20 (shown Figure 2) is adjacent to the Pacific Ocean; however, the parcel is situated on a cliffside, and the developable portion of the parcel is located outside the tsunami hazard zone (California Department of Conservation 2026). In the northern portion of the County, Subject Lots and water systems more proximate to the Salinas River or Elkhorn Slough could be subject to flood hazard or seiche risk. Nevertheless, the Ordinance would facilitate residential development, which would not typically store large quantities of pollutants. In addition, development facilitated by the Ordinance would remain subject to Monterey County's resource planning review process. If an individual project is in a flood hazard zone, it would require a Floodplain Development Permit and would be subject to base flood elevation design

requirements. Therefore, development facilitated by the Ordinance would not risk release of pollutants due to project inundation. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

The project site is in the Central Coastal Basin, which is regulated by the Central Coast Regional Water Quality Control Board (RWQCB). The Central Coast RWQCB regulates sources of water quality related issues resulting in actual or potential impairment or degradation of beneficial uses, or the overall degradation of water quality. The Water Quality Control Plan for the Central Coast Basin serves as the master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater, and includes programs of implementation to achieve water quality objectives (Central Coast RWQCB 2024). As discussed under threshold (a) above, development facilitated by the Ordinance would neither violate water quality standards nor degrade water quality. The Ordinance would allow alternative water treatment options for development in out-of-compliance water systems, which would facilitate the provision of drinking water that meets drinking water standards. Therefore, the Ordinance would not conflict with or obstruct implementation of the Water Quality Control Plan for the Central Coast Basin.

There are several groundwater basins in Monterey County, including the Salinas Valley Basin and its different aquifers, the Pajaro Valley Basin, and the Carmel Valley Alluvial Aquifer. Most development facilitated by the Ordinance would overlie the Salinas Valley Basin, which is managed by the Salinas Valley Basin Groundwater Sustainability Agency. As discussed under threshold (b) above, the Ordinance would remove one existing constraint to development but would neither increase water availability nor result in greater water consumption beyond what is already anticipated under existing regulations. Therefore, the Ordinance would not result in greater groundwater consumption than anticipated by the Salinas Valley Basin Groundwater Sustainability Agency's long-term basin sustainability planning. Activation of connections or approval of individual units remains subject to EHB review for water system adequacy. Adequate water supply would be verified as part of review of each individual development application. If adequate water supply cannot be demonstrated, the County would not approve the proposed development. Therefore, development facilitated by the Ordinance would not conflict with a sustainable groundwater management plan. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	■

a. Would the project physically divide an established community?

The Ordinance would facilitate development of a relatively small number of residences throughout Monterey County. Residential development is already allowed in these areas; the Ordinance would only facilitate development by allowing alternative, lower-cost water treatment option. Therefore, the Ordinance would facilitate residential development in areas already zoned and planned for residential development, and would not introduce new features like public roads or new land use designations that could result in the physical division of an established community. Therefore, the Ordinance would not physically divide an established community and no impact would occur.

NO IMPACT

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

The Ordinance would not modify land use designations, zoning designations, General Plan policies, or any applicable Area Plan provisions adopted to avoid or mitigate environmental effects. The Ordinance would allow alternative water treatment options for parcels in out-of-compliance water systems where residential development is already planned and anticipated, and development facilitated by the Ordinance would remain subject to the MCC, the 2010 General Plan, applicable Area Plans, the Local Coastal Program if located in the coastal zone, and existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur.

NO IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Implementation of the Ordinance would facilitate residential development in areas already designated for residential development, which are not located in areas with known mineral resources or mineral extraction operations. The development facilitated by the Ordinance would not result in the loss of availability of a known mineral resource, and no impact would occur.

NO IMPACT

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13 Noise

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

Overview of Noise and Vibration

Noise

Sound is a vibratory disturbance produced by a moving source and detected by the human hearing system. Noise is a subset of sound that is loud, unpleasant, unexpected, or undesired. The effects of noise can include annoyance, interference with speech, sleep disturbance, and, at higher levels or prolonged exposure, hearing impairment (Caltrans 2013). Noise levels are measured in A-weighted decibels (dBA), which adjust sound levels to reflect the sensitivity of the human ear, which is most responsive to frequencies near 4,000 Hertz. Because decibels are measured on a logarithmic scale, increases in sound energy do not correspond linearly to human perception. Generally, a 3 dBA change is barely perceptible, a 5 dBA change is clearly noticeable, and a 10 dBA increase is perceived as roughly twice as loud (Caltrans 2013).

As sound travels away from its source, noise levels decrease depending on distance, source type, ground conditions, and intervening structures. Noise from point sources typically attenuates by approximately 6 dBA per doubling of distance, while noise from line sources decreases by about 3 dBA per doubling. Soft ground surfaces provide additional attenuation, and natural or man-made barriers that block the line of sight can reduce noise levels by at least 5 dBA. Modern buildings further reduce noise exposure, typically providing an exterior-to-interior noise reduction of about 35 dBA (Caltrans 2013; Federal Highway Administration [FHWA] 2011).

Noise impacts also depend on duration and time of day. The equivalent sound level (Leq) is commonly used to represent average noise energy over a specified period, while Lmax and Lmin represent the highest and lowest measured levels. Because nighttime noise is more disturbing, community noise is often evaluated using Day-Night Average Level (DNL) or Community Noise Equivalent Level (CNEL), both of which apply penalties to evening and nighttime noise to reflect increased sensitivity during those hours (Caltrans 2013; Federal Transit Administration [FTA] 2018).

Vibration

Groundborne vibration consists of oscillatory waves that travel through the ground from a source to nearby buildings or structures, where the energy may propagate and be perceived indoors. Vibration may be felt or heard as low-frequency groundborne noise and can cause items such as windows, shelves, or wall hangings to rattle. While vibration is rarely annoying to people outdoors, it can be intrusive to occupants of vibration-sensitive land uses and, at sufficiently high levels, may cause structural or cosmetic damage. Groundborne vibration from human activities typically attenuates rapidly with distance and is commonly measured as peak particle velocity (PPV) or root mean squared velocity, expressed in inches per second. PPV is most often used because it correlates with stresses experienced by buildings (Caltrans 2020). Elevated vibration levels are generally associated with high-impact activities such as blasting, pile driving, demolition, drilling, or excavation.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Typical noise-sensitive land uses are residences, schools, hospitals, childcare, senior care, congregate care and churches.

Vibration-sensitive receptors are similar to noise-sensitive receptors and include residences and institutional uses, such as schools, churches, and hospitals. However, vibration-sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment, which can be affected by levels that may be well below those associated with human annoyance.

Regulatory Setting

Monterey County General Plan

The Safety Element of the County's General Plan identifies sources of noise and provides policies addressing existing and foreseeable noise problems (County of Monterey 2010). It includes Goal S-7 to maintain a healthy and quiet environment free from annoying and harmful sounds. Policies S-7.1 through S-7.7 outline noise compatibility standards for new noise sensitive land uses and require new development to incorporate design elements to minimize noise impacts on surrounding uses. Acoustical analysis is required when a project may result in noise compatibility impacts.

Policy S-7.1 The Land Use Compatibility for Community Noise in the County's General Plan identifies noise levels up to 60 dBA CNEL are considered normally acceptable for low-density residential land use, and noise levels up to 70 dBA CNEL are conditionally acceptable with incorporation of noise insulation features.

Policy S-7.8 relates to potential vibration impacts. All discretionary projects that propose to use heavy construction equipment that has the potential to create vibrations that could cause structural damage to adjacent structures within 100 feet shall be required to submit a pre-construction vibration study prior to the approval of a building permit. Pile driving or blasting are illustrative of the type of equipment that could be subject to this policy.

Policy S-7.9 No construction activities pursuant to a County permit that exceed "acceptable" levels listed in Policy S-7.1 (described below) shall be allowed within 500 feet of a noise sensitive land use during the evening hours of Monday through Saturday, or anytime on Sunday or holidays, prior to completion of a noise mitigation study. Noise protection measures, in the event of any identified impact, may include but not be limited to:

- Constructing temporary barriers; or
- Using quieter equipment than normal.

Policy S-7.10 Construction projects shall include the following standard noise protection measures:

- Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience;
- All equipment shall have properly operating mufflers; and
- Lay-down yards and semi-stationary equipment such as pumps or generators shall be located as far from noise-sensitive land uses as practical.

Monterey County Code

MCC Chapter 10.60 (Noise) establishes noise regulations in Monterey County. Section 10.60.030 states that operation of equipment with the potential to produce noise exceeding 70 dBA, measured 50 feet from the equipment, during any time of the day is prohibited within 2,500 feet from any occupied dwelling unit. Section 10.60.040 of the County Code states that "loud and unreasonable" nighttime noise that exceeds a maximum noise level 65 dBA, or average noise level of 45 Leq dBA, shall not be allowed between the hours of 10:00 p.m. to 7:00 a.m.

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

As the County does not define a quantitative daytime construction noise threshold, for purposes of analyzing impacts from construction facilitated by the Ordinance, the County has determined that the FTA construction criteria are applicable to the proposed project. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential uses, the daytime noise threshold is 80 dBA $L_{eq(8hr)}$ for an 8-hour period. Construction noise would be significant if it exceeds this threshold.

The Ordinance does not authorize specific development, but would facilitate the construction of new housing development in Monterey County. Over an approximately 10-year period, the Ordinance is anticipated to facilitate the development of up to 54 new single-family housing units and 200 ADUs dispersed throughout Monterey County. These units would be located on individual parcels within low-density and rural residential areas, where greater separation between residences and the absence of concentrated development patterns would further limit the potential for noticeable changes in ambient noise conditions.

Construction noise was evaluated using a conservative scenario in which a dozer, excavator, and backhoe would operate simultaneously during construction of a residence. Reference noise levels from the Roadway Construction Noise Model were applied, resulting in an estimated construction noise level of approximately 80 dBA L_{eq} at 50 feet. This level would not exceed the FTA's residential construction noise threshold of 80 dBA L_{eq}(8-hour). In addition, compliance with Policy S-7.10, as described in the *Regulatory Setting*, would ensure that construction activities occur only during allowable hours and that all equipment is equipped with properly maintained mufflers. With adherence to these requirements, construction-related noise would not result in a substantial temporary increase in ambient noise levels and impacts would be less than significant.

Stationary Operational Noise

Operational mechanical equipment (e.g., HVAC systems) would be installed on individual residences within a low-density or rural setting. In these areas, greater separation distances between homes typically limit the potential for noticeable increases in noise levels at nearby receptors. Operation of development facilitated by the Ordinance would be subject to Section 10.60.030 of the MCC, which restricts mechanical equipment noise to a maximum of 70 dBA, and Section 10.60.040, which limits nighttime noise to a maximum level of 65 dBA or an average level of 45 dBA Leq. Compliance with these local noise

standards would ensure that operational noise from mechanical equipment would not result in excessive noise levels. Therefore, operational noise impacts would be less than significant.

Operational Traffic Noise

Development facilitated by the Ordinance would not result in a substantial adverse effect on the transportation system as the incremental addition of 54 single-family units and 200 ADUs over the next 10 years would generate a minor increase in vehicle trips that would be absorbed by the existing roadway network without altering traffic patterns or creating new congestion. Traffic noise impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Land uses that typically generate groundborne vibration include industrial facilities, manufacturing facilities, or transportation operations. The Ordinance would facilitate residential development, which would not include substantial vibration sources in operation. Therefore, operational vibration impacts would be less than significant.

Construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers. The greatest anticipated source of vibration during general residential construction activities would be from a large bulldozer, which may be used within 15 feet of the nearest residential structures. It is not anticipated that more vibratory construction methods such as blasting or pile driving would be required for construction of development facilitated by the Ordinance. Table 9 shows vibration levels of anticipated equipment used during construction at distances of 15 feet and 25 feet from the nearest residential structures. Vibration levels were estimated using the FTA reference vibration levels at 25 feet.

Table 9 Vibration Levels Measured during Construction Activities

Construction Phase	PPV at 25 feet (in/sec)	PPV at 15 feet (in/sec)
Large Bulldozer	0.089	0.191
Loaded Trucks	0.076	0.164
Small Bulldozer	0.003	0.006

Source: FTA 2018

Based on FTA recommendations, limiting vibration levels to below 0.2 in/sec PPV at nonengineered timber and masonry buildings (residential buildings) would prevent architectural damage regardless of building construction type. A large bulldozer generates up to approximately 0.191 in/sec PPV at a distance of 15 feet (FTA 2018), which would not exceed the significance threshold of 0.2 in/sec PPV. Other construction equipment would have lower vibration levels, and would also not exceed the threshold. Therefore, development facilitated by the Ordinance would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The nearest airport to the nearest Subject Lot is Monterey Regional Airport, which is located over two miles to the east. According to the Monterey Regional Airport Land Use Compatibility Plan (Monterey 2019), the nearest Subject Lot would not be located within the airport's 65 CNEL noise contour. Therefore, development facilitated by the Ordinance would not expose people or structures to airport noise. No impact would occur.

NO IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

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

As discussed under "Potential Buildout Facilitated by the Reinstated Ordinance" in Initial Study Section 8, *Description of Project*, it is conservatively estimated that the Ordinance would facilitate development of 54 new single-family units and approximately 20 ADUs per year over 10 years, for a total of 254 new residences in the County. The California Department of Finance estimates the average household size in unincorporated Monterey County is 2.84 persons per dwelling unit (California Department of Finance 2025). Multiplying the 2.84 persons per dwelling unit by the project's 254 units results in an estimated additional population of 722 residents. This analysis conservatively assumes that these residents would be new residents in the County and would relocate from elsewhere, and that the number of residents per ADU would be the same as residents per single-family unit.

The 2010 Monterey County General Plan projected future population growth with population projections provided by AMBAG. At the time the 2010 General Plan was prepared, AMBAG forecasted the population of Monterey County to increase from 464,847 people in 2010 to 602,731 people in 2030 (County of Monterey 2011). Since preparation of the 2010 General Plan, AMBAG's population projections have changed; as described in the 2026 Subregional Growth Forecast, AMBAG anticipates that the population of Monterey County will be approximately 446,857 people by 2030 and 454,652 by 2040 (AMBAG 2024).

According to the California Department of Finance, the 2025 population of Monterey County was 438,831 people (California Department of Finance 2025). Development facilitated by the Ordinance would add approximately 722 people to the County over 10 years. This increase is well within the anticipated population growth for the County, and accordingly, the Ordinance would not induce substantial unplanned population growth.

The extension of roadways and infrastructure is typically associated with the development of new subdivisions, which require new and extended roads, power lines, water lines, and other utilities to connect to several new parcels. As discussed under "Growth-Inducing Development Scenarios" in Initial Study Section 8, *Description of Project*, it is EHB's intent to eliminate the possibility of using POU or POE water treatment in future subdivisions on private wells, and to only allow new subdivisions to use centralized treatment if water treatment is necessary. Accordingly, the Ordinance would facilitate development in areas where roads and infrastructure are already present, and reinstatement of the Ordinance would not result in the extension of roads or other infrastructure that would indirectly induce growth. No impact would occur.

LESS-THAN-SIGNIFICANT IMPACT

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

The Ordinance would facilitate development of residences on vacant lots, and development of ADUs on previously developed lots within out-of-compliance water systems. Because residences facilitated by the Ordinance would be located on vacant lots, they would not displace existing people or housing. Further, the development of ADUs would provide additional housing, and since they would be accessory to an existing residence by nature, the ADUs developed under the Ordinance would not displace existing people or housing. Therefore, the Ordinance would not displace substantial numbers of people or housing and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

NO IMPACT

15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	☐	☐	■	☐
2 Police protection?	☐	☐	■	☐
3 Schools?	☐	☐	■	☐
4 Parks?	☐	☐	■	☐
5 Other public facilities?	☐	☐	■	☐

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The Ordinance would facilitate development of a relatively small number of residences throughout Monterey County by allowing an alternative, lower-cost water treatment option. Residential development is already allowed in these areas, and existing residences in these areas are currently served by fire and police protection providers. Any new residences facilitated by the Ordinance would be located within the existing service areas of fire and police departments. Because the Ordinance would not enable growth beyond what is already allowed, nor extend development into new or unserved areas, it would not require the construction of new or expanded fire or police protection facilities.

Development facilitated by the Ordinance would be located across several school districts in the County. The relatively minor increase in residences would incrementally add students to the student population of each district, but would not introduce a substantial number of students such that new or physically altered schools would be required.

The Ordinance would facilitate the introduction of 722 residents throughout the County, which would incrementally increase demand for parks and recreational facilities. Because new residents would be dispersed throughout the County and would be introduced to the County gradually, the Ordinance would not result in the need for new or physically altered parks. Overall, impacts related to public services would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

16 Recreation



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

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

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

As discussed above in Environmental Checklist Section 15, *Public Services,* the Ordinance would facilitate the introduction of 722 residents throughout the County, which would incrementally increase demand for parks and recreational facilities. New residents would be dispersed throughout the County and would be introduced to the County gradually. The relatively minor increase in residents would not result in the substantial physical deterioration of recreational facilities. Further, residential development facilitated by the Ordinance would not include the construction or expansion of recreational facilities. Impacts to recreation would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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17 Transportation



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

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Ordinance would facilitate development of a relatively small number of residences throughout Monterey County by allowing alternative, lower-cost water treatment options, thereby removing an economic constraint on development. Residential development is already allowed in these areas. Transportation to and from these residences would be accommodated by existing transit, roadway, bicycle, and pedestrian facilities. Development facilitated by the Ordinance would not conflict with a program, plan, ordinance, or policy addressing the circulation system. No impact would occur.

NO IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines section 15064.3, subdivision (b), requires transportation impacts to be evaluated based on vehicle miles traveled (VMT), rather than in terms of level of service or roadway congestion. VMT represents the amount and distance of automobile travel associated with a project and is used as a metric for transportation-related environmental effects, including greenhouse gas emissions and energy consumption. At this time, the County has not adopted their own VMT thresholds. Therefore, state guidelines were used as guidance for evaluating potential transportation impacts from the Ordinance.

In its *Technical Advisory on Evaluating Transportation Impacts in CEQA*, the Governor's Office of Land Use and Climate Innovation (LCI, formerly Office of Planning and Research) recommends that projects resulting in VMT per capita or total VMT that is less than or equal to 85 percent of existing regional or citywide averages be considered less than significant for CEQA purposes. In other words, projects that generate VMT greater than 15 percent below the baseline level of VMT are considered to have significant impacts under CEQA (LCI 2018).

Development facilitated by the Ordinance would occur within existing out-of-compliance local small, State small, and public water systems. These water systems are generally located outside the service boundaries of municipal and regional water providers and are typically situated in rural areas of Monterey County. As a result, the subject parcels and associated water systems where development could occur under the Ordinance tend to be farther from schools, employment centers, commercial services, and other common daily destinations. Consequently, future residents in these areas would generally be required to travel longer distances to access routine services and activities compared to residents in urban or suburban areas.

In the *Technical Advisory,* LCI identifies several screening thresholds for land use projects to identify when a project should be expected to cause a less-than-significant impact to VMT without conducting a detailed study. These screening thresholds apply to small projects that generate less than 110 trips per day, residential and office projects located in areas with low existing VMT, or projects located near transit services. Development facilitated by the Ordinance would facilitate development of 54 new single-family units and up to 200 ADUs, and residents of this development, when considered together, would generate more than 110 trips per day. Due to the rural nature of where development would occur, development facilitated by the Ordinance would not be located in areas with low existing VMT or in areas near existing transit services. Therefore, none of the screening thresholds apply and development facilitated by the Ordinance cannot be assumed to have a less than significant VMT impact.

Monterey County has identified several transportation demand management strategies to reduce VMT, including the provision of transit services, ridesharing and commuting services, bicycle infrastructure, and neighborhood enhancement strategies that promote mixed-use development and shorter trip lengths. These strategies are generally most effective in urbanized areas with higher densities, established transit networks, and close proximity between residential uses, employment centers, and daily services. However, these strategies would not effectively reduce VMT associated with development facilitated by the Ordinance, because development would be located in generally rural areas characterized by low densities, dispersed land uses, and limited to no access to transit services, bicycle facilities, or nearby commercial centers. In these settings, residents typically rely on personal vehicles to meet daily travel needs, and opportunities to shift trips to alternative modes of transportation are limited. While Countywide transportation demand management strategies would remain in place; however, they would not substantially alter travel behavior or meaningfully reduce VMT generated by development facilitated by the Ordinance.

Because VMT screening thresholds do not apply impacts related to VMT would be potentially significant.

POTENTIALLY SIGNIFICANT IMPACT

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

Development facilitated by the Ordinance would occur in areas where residential development is already planned and anticipated. Although VMT associated with new rural residential development may be higher per-capita than urban areas, the Ordinance would facilitate a relatively small number of additional residences, dispersed across out-of-compliance water systems throughout the County. As a result, while VMT impacts would be potentially significant, the incremental increase in traffic volumes on individual roadways would be minimal. Individual development applications would continue to be reviewed by Monterey County and local emergency service providers for hazardous roadway conditions and emergency vehicle access. The relatively minimal, dispersed increase in residential units would not introduce incompatible roadway uses or increase traffic volumes to a degree that would create hazardous roadway conditions. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

As discussed above, development facilitated by the Ordinance would occur where residential development is already planned and anticipated, in areas already served by existing roads. Individual development applications would be reviewed by local emergency service providers for adequate emergency access. In addition, development facilitated by the Ordinance would be dispersed, with only a few Subject Lots identified for each affected water system. The addition of a few residences to each water system would not substantially increase traffic or congestion in one area such that emergency access is impacted. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

18 Tribal Cultural Resources

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

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

The Ordinance would allow alternative and lower-cost water treatment options, and accordingly, would facilitate development in vacant lots where development may otherwise be infeasible or cost prohibitive due to the failing centralized water treatment system. Therefore, it is assumed that development facilitated by the Ordinance would generally occur in vacant parcels, and could encounter unknown tribal cultural resources during construction.

Development facilitated by the Ordinance would be subject to Monterey County's planning review process, and would be subject to General Plan policies and ordinances pertaining to tribal cultural resources, as well as any statutory requirements. As part of its review, the County would determine if proposed development is located in an sensitive area or an area known to contain tribal cultural resources. If it is determined that the project may affect a resource, the County would require further site-specific resources assessments and conditions of approval intended to avoid and minimize impacts. Conditions of approval typically require construction work to halt if unanticipated tribal cultural resources are uncovered, and a qualified archaeologist or tribal monitor must evaluate the find and recommend appropriate treatment. Individual development projects would also be evaluated for consistency with the 2010 General Plan and the applicable area plan, which contain policies related to the protection and preservation of tribal cultural resources. In the 2010 General Plan, Policy OS-8.1 directs the identification and protection of burial sites and sacred places and states they shall be preserved to the greatest extent possible as permitted by law. Further, Policy OS-8.3 requires that development proposed on sites containing known burials or cemeteries shall not modify, disturb, excavate, or otherwise develop such areas until full compliance with CEQA, the Native American Heritage Commission, applicable Health and

Safety Code and Government Code provisions, and any completed Memorandum of Understanding with a local tribe has been achieved.

If any kind of human remains are encountered during construction activities associated with development facilitated by the Ordinance, all work in the vicinity would be required to cease immediately in accordance with California Health and Safety Code Section 7050.5. The County Coroner would then determine the origin and appropriate disposition of the remains pursuant to Public Resources Code Section 5097.98. Accordingly, the Ordinance would not cause a substantial adverse change in the significance of a tribal cultural resource, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. 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?	☐	☐	■	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	■	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	■	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

a. Would the project 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?

The Ordinance would facilitate development of a limited number of residences throughout Monterey County by allowing an alternative water treatment option within existing, noncompliant water systems. Residential development is already allowed and anticipated in these areas. The County would not approve a new residence or ADU in a shared well system unless adequate water supply is demonstrated The Ordinance would allow the use of POU or POE treatment devices for individual developments, whereas only centralized treatment systems are currently allowed. By authorizing these alternative treatment methods, the Ordinance would remove one existing constraint to development but would not increase water availability or result in greater water consumption beyond what is already anticipated under existing regulations. Further, the construction of POU or POE water treatment devices would generally be contained within the construction footprint of individual development facilitated by the Ordinance, and would not constitute the construction of substantial new or expanded water treatment facilities.

The Ordinance would not alter existing requirements and regulations that pertain to the provision of wastewater treatment, storm drainage, electric power, natural gas, and telecommunications facilities in the County. Development facilitated by the Ordinance would continue to be required to provide such facilities, and the potential environmental impacts of these facilities would be evaluated by the County for each individual development application. Therefore, development facilitated by the Ordinance would not result in significant environmental effects related to the relocation or construction of new or expanded

water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As discussed above, the Ordinance would facilitate development of a limited number of residences throughout Monterey County by allowing an alternative water treatment option within existing, noncompliant water systems. By authorizing alternative treatment methods, the Ordinance would remove one existing constraint to development but would not increase water availability or result in greater water consumption beyond what is already anticipated under existing regulations. The Ordinance would not create new water systems or make new water sources available, and it would not change entitlement to water. Activation of connections or approval of individual units remains subject to EHB review for water system adequacy, and adequate water supply would be verified as part of review of each individual development application. The County would not approve a new residence or ADU in a shared well system unless adequate water supply is demonstrated. Therefore, the Ordinance would not result in insufficient water supplies for reasonably foreseeable future development during normal, dry and multiple dry years, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Development facilitated by the Ordinance would generally occur in rural areas outside the service boundaries of municipal or regional wastewater treatment providers and would therefore rely on on-site septic systems or other alternative wastewater treatment systems. A limited number of residences facilitated by the Ordinance may be located within areas served by an existing wastewater treatment provider. In those instances, any additional wastewater generated by a small number of residences would represent a negligible increase in wastewater flows and would not meaningfully affect wastewater treatment operations or capacity.

Most development facilitated by the Ordinance would require on-site wastewater treatment, and wastewater treatment methods and devices would continue to be subject to the County's planning review process and Chapter 15.20, Sewage Disposal, of the MCC. Chapter 15.20 regulates on-site wastewater treatment systems and requires the proper design, placement, installation, maintenance, and evaluation of individual systems. Therefore, the Ordinance would not result in a determination by a wastewater treatment provider that it has inadequate capacity, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The approximately 54 single-family units and 200 ADUs facilitated by the Ordinance would generate a relatively minor amount of solid waste in the County. The California Department of Resources Recycling and Recovery (CalRecycle) estimates the average household generates approximately 10 pounds of solid waste per day (CalRecycle 1992). At full buildout, the 254 units facilitated by the Ordinance would result in the generation of 2,440 pounds of solid waste per day, or 1.2 tons per day. The primary landfills in Monterey County include the Monterey Peninsula Landfill in Marina, and the Johnson Canyon Sanitary

Landfill located near Gonzales. These landfills have a maximum daily throughput of 3,500 tons and 1,600 tons, respectively, and both have several million cubic yards of remaining capacity (CalRecycle 2026a; 2026b). Development facilitated by the Ordinance would be required to comply with CALGreen, which mandates that at least 65 percent of non-hazardous construction and demolition waste be diverted from landfills. Therefore, development facilitated by the Ordinance would not generate solid waste in excess of state and local standards or in excess of local infrastructure capacity. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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20 Wildfire

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

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Development facilitated by the Ordinance would occur throughout the County's unincorporated areas. Because these areas are generally rural, many of the residences facilitated by the Ordinance would likely be located within Moderate, High, or Very High Fire Hazard Severity Zones, as designated by the California Department of Forestry and Fire Protection (CALFIRE; CALFIRE 2023). The Ordinance would facilitate development in areas where residential growth is already planned and anticipated, and would add a relatively small number of residences to each out-of-compliance water system. The addition of a few residences to each water system would not result in substantial traffic congestion or inhibit access for emergency response or evacuation. Accordingly, the Ordinance would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The Ordinance would facilitate development in areas where residential growth is already planned and anticipated, and would not substantially increase the risk of wildfire. Future development facilitated by the Ordinance would likely be located in a Moderate, High, or Very High FHSZs, and environmental conditions such as slope, wind, and other factors can influence the likelihood or the behavior of a wildfire. Development would continue to be subject regulations and ordinances intended to reduce the risk of wildfire hazards to residential uses. This includes compliance with CBC wildland-urban interface construction standards, which regulate building construction in fire prone areas and requires ignition-

resistant materials, and CAL FIRE Defensible Space Requirements (Public Resources Code Section 4291), which requires property owners to maintain defensible space and to keep roadways and buildings free of vegetation for emergency access. In addition, development facilitated by the Ordinance would be subject to MCC Chapter 18.56 (Wildfire Protection) which requires development to have adequate fire apparatus access, sufficient on-site water supply and pressure for firefighting, and allows the County to apply site-specific wildfire protection measures based on site topography, slope, vegetation, access, and other environmental conditions. Therefore, the Ordinance would not exacerbate wildfire risks due to slope, prevailing winds, or other factors, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The Ordinance would facilitate development in areas where residential growth is already planned and anticipated, in areas already served by existing roadways, water sources, power lines, and other utilities. Individual residences facilitated by the Ordinance may require on-site wastewater treatment systems or minor extensions of power lines, but the installation of this infrastructure would not substantially increase fire risk in the areas where development would occur and would not result in temporary or ongoing impacts to the environment. As discussed above, development facilitated by the Ordinance would comply with CBC wildland-urban interface construction standards, CALFIRE Defensible Space Requirements, and MCC Chapter 18.56, which would require specific construction materials and methods in fire-prone areas and site-specific wildfire protection measures. Therefore, the Ordinance would not exacerbate risk associated with the installation or maintenance of roads and utility infrastructure, and impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Development facilitated by the Ordinance could be located on sloped sites subject to landslides and slope instability, which could be exacerbated by a wildfire or post-wildfire conditions. Development would be subject to MCC regulations that pertain to development on sloped sites. Chapter 16.08, Grading, regulates excavation and earthwork and typically requires engineered grading plans and geotechnical review for sites that create slops steeper than a 2:1 horizontal to vertical ratio or cut slopes greater than five feet. Chapter 16.12, Erosion Control, requires preparation and implementation of erosion and sediment control measures when development occurs on slopes prone to accelerated erosion. In addition, Chapter 18.56, Wildfire Protection, allows the County to apply site-specific conditions where slope can increase wildfire risk. Development facilitated by the Ordinance would also be subject to the County's resource planning review process, which would be conducted by the County's Housing and Community Development Department and other departments as necessary when a project proponent applies for development. This review process would identify potential hazards present in each individual development site, and pursuant to MCC Chapter 18.56, the County is authorized to apply site-specific wildfire protection measures to minimize fire risks. With compliance with these requirements and implementation of protection measures, development facilitated by the Ordinance would not expose people or structures to significant risks from downslope and downstream flooding, landslides, or runoff related to post-fire slope instability. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

21 Mandatory Findings of Significance

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

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

As discussed in Environmental Checklist Section 4, *Biological Resources*, the proposed project would not substantially reduce the habitat of fish and wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. In addition, as discussed in Environmental Checklist Section 5, *Cultural Resources*, the project would not eliminate important examples of the major periods of California history or prehistory because none are known to be present in the project area. Impacts would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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

Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects which, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area. Cumulatively considerable impacts could occur if the construction of other projects occurs at the same time as development facilitated by the Ordinance and in the same vicinity, such that the effects of similar impacts of multiple projects combine to expose adjacent sensitive receptors to greater levels of impact than would occur under the proposed project. For

example, if the construction of other projects in the area occurs at the same time as construction of development facilitated by the Ordinance, potential impacts associated with noise and traffic in the project area may be more substantial.

This Initial Study effectively provides a cumulative impact analysis for development facilitated by the Ordinance. The Ordinance would facilitate the development of single-family units on Subject Lots, which would generally be exempt from CEQA review on an individual basis, and the development of ADUs, which would generally be exempt from CEQA review with their permitting streamlined by State law (see "Accessory Dwelling Units – Development Scenario 4" in Initial Study Section 8, *Description of Project)*. This Initial Study in and of itself provides a holistic, cumulative impact analysis of development facilitated by the Ordinance, which is estimated to include up to 54 single-family units and 200 ADUs that would be built out over approximately 10 years. Therefore, this Initial Study in part addresses impacts that individually limited but cumulatively considerable. Nevertheless, the cumulative analysis herein evaluates development facilitated by the Ordinance in combination with buildout allowed under the 2010 General Plan in order to more fully capture the potential cumulative impacts associated with the Ordinance.

Pursuant to CEQA Guidelines Section 15130(b), the lead agency should define the geographic scope of the area affected by cumulative impacts, and that the lead agency may evaluate cumulative impacts either by using a list of past, present and probably future projects, or by using a summary of projections contained in an adopted local, regional, or statewide plan. Such plans may include a general plan, regional transportation plan or in an adopted or certified prior environmental document for such a plan. For this Initial Study, the County's 2010 General Plan and associated Environmental Impact Report (EIR) are used to evaluate cumulative impacts.

The geographic scope of potential cumulative impacts is Monterey County. This geographic scope is appropriate because the Ordinance would apply to out-of-compliance water systems throughout the unincorporated area of Monterey County. Significant cumulative impacts would occur if cumulative impacts are already present in the applicable geographic scope, and if implementation of the Ordinance would contribute considerably to those impacts. The 2010 General Plan EIR analyzed the cumulative buildout of development in Monterey County under the General Plan, and identified significant and unavoidable impacts to aesthetics, agriculture, air quality, climate change, water resources, population and housing, and public services and utilities (County of Monterey 2011). Therefore, buildout under the 2010 Monterey County General Plan would result in cumulative impacts to these resource areas.

Because the primary result of the Ordinance would be additional housing and population in the County, the Ordinance could result in cumulatively considerable impacts if individual developments made feasible by the Ordinance exceed the buildout estimates in the 2010 General Plan and its associated EIR. The 2010 General Plan EIR identifies that the County has experienced steady, if sometimes uneven, increases in population and housing, and that implementation of the 2010 General Plan would facilitate the buildout of approximately 10,015 additional dwelling units in the unincorporated area by 2030. Using AMBAG population projections, the 2010 General Plan EIR identified a potential population increase of approximately 25,292 people (County of Monterey 2011). The 2010 General Plan EIR determined that most of this growth would occur in the northern plan areas of the County, with approximately 3,295 dwelling units in Fort Ord, 259 units in Pajaro, 278 units in Boronda, and 625 units in Castroville (County of Monterey 2011).

Development facilitated by the Ordinance would be consistent with this anticipated growth. As discussed in Initial Study Section 8, *Description of Project*, and shown in Figure 1, most water systems are located in the northern portion of the County. As discussed in Environmental Checklist Section 14, *Population and Housing*, development and population facilitated by the Ordinance would be within the population and housing estimates included in the 2010 General Plan and its EIR, and would be within current (2026) AMBAG population projections for 2030 and 2040. Accordingly, development facilitated by the Ordinance would occur in areas where growth was already planned and anticipated, and consists of growth anticipated by the 2010 General Plan EIR. As discussed in Environmental Checklist Section 17, *Transportation,* the Ordinance would result in potentially significant impacts related to VMT. The 2010 General Plan EIR was certified before VMT became the standard metric for determining transportation

impacts, and does not contain a VMT-based analysis. Outside of the Monterey peninsula and Salinas, Monterey County is generally rural in character, with low population densities, limited transit services, and long travel distances between residential areas, employment centers, and services. As a result, most new developments would be automobile-dependent and would generate higher VMT per capita compared to baseline conditions. Therefore, given the level of development anticipated and evaluated in the General Plan and its EIR, it is reasonable to conclude that a VMT-based analysis would have identified potentially significant VMT impacts had such an analysis been required at the time. Although the Ordinance may result in potentially significant impacts related to VMT, the buildout facilitated by the Ordinance would be relatively small compared to buildout envisioned under the 2010 General Plan. Overall, the Ordinance would not result in a cumulatively considerable contribution to cumulative impacts in Monterey County.

LESS-THAN-SIGNIFICANT IMPACT

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

Impacts to human beings are generally associated with air quality, hazards and hazardous materials, noise, and wildfire. As detailed in Environmental Checklist Section 3, *Air Quality*, the Ordinance would not result, either directly or indirectly, in substantial adverse effects related to air quality. As discussed in Environmental Checklist Section 9, *Hazards and Hazardous Materials*, development facilitated by the Ordinance would not result in impacts related to hazards and hazardous materials. As discussed in Environmental Checklist Section 13, *Noise*, impacts related to noise would be less than significant, and as discussed in Environmental Checklist Section 20, *Wildfire*, impacts related to wildfire would be less than significant. Therefore, impacts to human beings would be less than significant.

LESS-THAN-SIGNIFICANT IMPACT

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Appendix A

CalEEMod Modeling Results

POU-POE Ordinance Change Project - Construction SFH ONLY Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	POU-POE Ordinance Change Project - Construction SFH ONLY
Construction Start Date	1/1/2027
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.80000
Precipitation (days)	27.6000
Location	Monterey County, CA, USA
County	Monterey
City	Monterey
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3238
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.39

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	44.0000	Dwelling Unit	14.2857	85,800.0	515,366	—	146.000	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

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.	114.262	114.238	9.55951	13.6217	0.02403	0.33782	0.12978	0.46760	0.31090	0.03142	0.34231	—	2,596.34	2,596.34	0.10679	0.03651	0.59790	2,610.49
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.70871	3.12267	28.0353	28.9327	0.06093	1.17173	7.78332	8.95506	1.07799	3.96740	5.04539	—	6,729.30	6,729.30	0.27667	0.05947	0.01554	6,753.95
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	6.66103	6.59594	9.17665	11.5218	0.02120	0.34523	0.59380	0.93903	0.31767	0.24638	0.56405	—	2,303.98	2,303.98	0.09523	0.02803	0.17301	2,314.89
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.21564	1.20376	1.67474	2.10273	0.00387	0.06301	0.10837	0.17137	0.05797	0.04496	0.10294	—	381.451	381.451	0.01577	0.00464	0.02864	383.256

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

Includes both onsite and offsite emissions.

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.31230	1.09914	9.55951	13.6217	0.02402	0.33782	0.12978	0.46760	0.31090	0.03142	0.34231	—	2,596.34	2,596.34	0.10677	0.03651	0.59790	2,610.49
2028	114.262	114.238	9.08442	13.5747	0.02403	0.30149	0.12978	0.43126	0.27747	0.03142	0.30889	—	2,592.48	2,592.48	0.10679	0.03641	0.54381	2,606.55
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	3.70871	3.12267	28.0353	28.9327	0.06093	1.17173	7.78332	8.95506	1.07799	3.96740	5.04539	—	6,729.30	6,729.30	0.27667	0.05947	0.01554	6,753.95
2028	1.25922	1.05725	9.10345	13.5496	0.02403	0.30149	0.12978	0.43126	0.27747	0.03142	0.30889	—	2,586.39	2,586.39	0.10453	0.03686	0.01408	2,600.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.25630	1.05584	9.17665	11.5218	0.02120	0.34523	0.59380	0.93903	0.31767	0.24638	0.56405	—	2,303.98	2,303.98	0.09523	0.02803	0.17301	2,314.89
2028	6.66103	6.59594	2.95608	4.42118	0.00758	0.09921	0.04223	0.14145	0.09130	0.01017	0.10147	—	820.460	820.460	0.03291	0.01134	0.07581	824.738
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.22927	0.19269	1.67474	2.10273	0.00387	0.06301	0.10837	0.17137	0.05797	0.04496	0.10294	—	381.451	381.451	0.01577	0.00464	0.02864	383.256
2028	1.21564	1.20376	0.53949	0.80687	0.00138	0.01811	0.00771	0.02581	0.01666	0.00186	0.01852	—	135.836	135.836	0.00545	0.00188	0.01255	136.545

2.2.2. Onsite 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	0.00000	0.33657	0.30965	0.00000	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	0.00000	2,405.30
2028	114.248	114.225	8.92495	12.9352	0.02340	0.30024	0.00000	0.30024	0.27622	0.00000	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	0.00000	2,405.68
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	3.63178	3.05170	27.9724	28.2794	0.06093	1.17173	7.66623	8.83797	1.07799	3.93995	5.01795	—	6,598.08	6,598.08	0.26765	0.05353	0.00000	6,620.72
2028	1.18481	0.99143	8.92495	12.9352	0.02340	0.30024	0.00000	0.30024	0.27622	0.00000	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	0.00000	2,405.68

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.20179	1.00734	9.06824	11.0766	0.02086	0.34455	0.50505	0.84961	0.31699	0.22506	0.54205	—	2,179.31	2,179.31	0.08840	0.01768	0.00000	2,186.79
2028	6.63641	6.57392	2.90502	4.22413	0.00741	0.09886	0.00000	0.09886	0.09095	0.00000	0.09095	—	761.025	761.025	0.03087	0.00617	0.00000	763.636
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.21933	0.18384	1.65495	2.02148	0.00381	0.06288	0.09217	0.15505	0.05785	0.04107	0.09892	—	360.810	360.810	0.01464	0.00293	0.00000	362.049
2028	1.21114	1.19974	0.53017	0.77090	0.00135	0.01804	0.00000	0.01804	0.01660	0.00000	0.01660	—	125.996	125.996	0.00511	0.00102	0.00000	126.429

2.2.3. Offsite 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.08154	0.06927	0.16858	0.68379	0.00063	0.00125	0.12978	0.13103	0.00125	0.03142	0.03267	—	199.260	199.260	0.00954	0.01706	0.59790	205.181
2028	0.07566	0.06742	0.15947	0.63949	0.00063	0.00125	0.12978	0.13103	0.00125	0.03142	0.03267	—	195.028	195.028	0.00954	0.01696	0.54381	200.865
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.08792	0.08110	0.18823	0.74671	0.00063	0.00125	0.13382	0.13382	0.00125	0.03142	0.03267	—	193.038	193.038	0.01058	0.01741	0.01554	198.508
2028	0.07440	0.06581	0.17850	0.61435	0.00063	0.00125	0.12978	0.13103	0.00125	0.03142	0.03267	—	188.935	188.935	0.00728	0.01741	0.01408	194.320
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.05451	0.04850	0.10840	0.44519	0.00034	0.00068	0.08874	0.08942	0.00068	0.02132	0.02200	—	124.669	124.669	0.00683	0.01035	0.17301	128.097
2028	0.02462	0.02201	0.05106	0.19705	0.00017	0.00035	0.04223	0.04258	0.00035	0.01017	0.01052	—	59.4349	59.4349	0.00204	0.00517	0.07581	61.1019
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.00995	0.00885	0.01978	0.08125	0.00006	0.00012	0.01620	0.01632	0.00012	0.00389	0.00401	—	20.6404	20.6404	0.00113	0.00171	0.02864	21.2079
2028	0.00449	0.00402	0.00932	0.03596	0.00003	0.00006	0.00771	0.00777	0.00006	0.00186	0.00192	—	9.84012	9.84012	0.00034	0.00086	0.01255	10.1161

3. Construction Emissions Details

3.1. Site Preparation (2027)

3.1.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.63178	3.05170	27.9724	28.2794	0.04891	1.17173	—	1.17173	1.07799	—	1.07799	—	5,297.82	5,297.82	0.21490	0.04298	—	5,316.00
Dust From Material Movement	—	—	—	—	—	—	7.66623	7.66623	—	3.93995	3.93995	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09950	0.08361	0.76637	0.77478	0.00134	0.03210	—	0.03210	0.02953	—	0.02953	—	145.146	145.146	0.00589	0.00118	—	145.644
Dust From Material Movement	—	—	—	—	—	—	0.21003	0.21003	—	0.10794	0.10794	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.01816	0.01526	0.13986	0.14140	0.00024	0.00586	—	0.00586	0.00539	—	0.00539	—	24.0305	24.0305	0.00097	0.00019	—	24.1130
Dust From Material Movement	—	—	—	—	—	—	0.03833	0.03833	—	0.01970	0.01970	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.1.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07693	0.07097	0.06293	0.65338	0.00000	0.00000	0.11709	0.11709	0.00000	0.02745	0.02745	—	114.817	114.817	0.00790	0.00520	0.01160	116.575
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00209	0.00193	0.00159	0.01711	0.00000	0.00000	0.00315	0.00315	0.00000	0.00074	0.00074	—	3.16045	3.16045	0.00021	0.00014	0.00528	3.21330
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00038	0.00035	0.00029	0.00312	0.00000	0.00000	0.00058	0.00058	0.00000	0.00013	0.00013	—	0.52325	0.52325	0.00003	0.00002	0.00087	0.53200
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2. Grading (2027)

3.2.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.50534	2.94546	25.5801	27.2816	0.06093	1.04307	—	1.04307	0.95962	—	0.95962	—	6,598.08	6,598.08	0.26765	0.05353	—	6,620.72
Dust From Material Movement	—	—	—	—	—	—	3.58940	3.58940	—	1.42496	1.42496	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.28811	0.24209	2.10247	2.24233	0.00501	0.08573	—	0.08573	0.07887	—	0.07887	—	542.308	542.308	0.02200	0.00440	—	544.169
Dust From Material Movement	—	—	—	—	—	—	0.29502	0.29502	—	0.11712	0.11712	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.05258	0.04418	0.38370	0.40922	0.00091	0.01565	—	0.01565	0.01439	—	0.01439	—	89.7852	89.7852	0.00364	0.00073	—	90.0934
Dust From Material Movement	—	—	—	—	—	—	0.05384	0.05384	—	0.02137	0.02137	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08792	0.08110	0.07192	0.74671	0.00000	0.00000	0.13382	0.13382	0.00000	0.03137	0.03137	—	131.220	131.220	0.00903	0.00594	0.01326	133.229
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00715	0.00663	0.00546	0.05865	0.00000	0.00000	0.01080	0.01080	0.00000	0.00253	0.00253	—	10.8358	10.8358	0.00071	0.00049	0.01811	11.0170
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00131	0.00121	0.00100	0.01070	0.00000	0.00000	0.00197	0.00197	0.00000	0.00046	0.00046	—	1.79399	1.79399	0.00012	0.00008	0.00300	1.82400
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3. Building Construction (2027)

3.3.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.66957	0.56029	5.10896	7.03865	0.01273	0.18311	—	0.18311	0.16846	—	0.16846	—	1,304.09	1,304.09	0.05290	0.01058	—	1,308.56
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12220	0.10225	0.93239	1.28455	0.00232	0.03342	—	0.03342	0.03074	—	0.03074	—	215.906	215.906	0.00876	0.00175	—	216.647

Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07364	0.06563	0.04459	0.62424	0.00000	0.00000	0.10598	0.10598	0.00000	0.02484	0.02484	—	110.240	110.240	0.00610	0.00435	0.40386	112.094
Vendor	0.00790	0.00364	0.12399	0.05955	0.00063	0.00125	0.02379	0.02504	0.00125	0.00657	0.00782	—	89.0201	89.0201	0.00343	0.01271	0.19403	93.0876
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06964	0.06423	0.05696	0.59140	0.00000	0.00000	0.10598	0.10598	0.00000	0.02484	0.02484	—	103.926	103.926	0.00715	0.00470	0.01050	105.517
Vendor	0.00749	0.00332	0.13127	0.06110	0.00063	0.00125	0.02379	0.02504	0.00125	0.00657	0.00782	—	89.1123	89.1123	0.00343	0.01271	0.00504	92.9909
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03750	0.03476	0.02862	0.30748	0.00000	0.00000	0.05664	0.05664	0.00000	0.01326	0.01326	—	56.8045	56.8045	0.00370	0.00256	0.09493	57.7545
Vendor	0.00419	0.00187	0.07000	0.03262	0.00034	0.00068	0.01275	0.01343	0.00068	0.00353	0.00421	—	48.4507	48.4507	0.00187	0.00691	0.04563	50.6036
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00684	0.00634	0.00522	0.05611	0.00000	0.00000	0.01034	0.01034	0.00000	0.00242	0.00242	—	9.40463	9.40463	0.00061	0.00042	0.01572	9.56191
Vendor	0.00076	0.00034	0.01278	0.00595	0.00006	0.00012	0.00233	0.00245	0.00012	0.00064	0.00077	—	8.02156	8.02156	0.00031	0.00114	0.00755	8.37800
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4. Building Construction (2028)

3.4.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18481	0.99143	8.92495	12.9352	0.02340	0.30024	—	0.30024	0.27622	—	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	—	2,405.68
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18481	0.99143	8.92495	12.9352	0.02340	0.30024	—	0.30024	0.27622	—	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	—	2,405.68
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33156	0.27745	2.49759	3.61984	0.00655	0.08402	—	0.08402	0.07730	—	0.07730	—	670.913	670.913	0.02722	0.00544	—	673.215
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06051	0.05063	0.45581	0.66062	0.00120	0.01533	—	0.01533	0.01411	—	0.01411	—	111.077	111.077	0.00451	0.00090	—	111.458
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06859	0.06388	0.04059	0.58348	0.00000	0.00000	0.10598	0.10598	0.00000	0.02484	0.02484	—	108.236	108.236	0.00610	0.00435	0.37123	110.057
Vendor	0.00707	0.00353	0.11888	0.05601	0.00063	0.00125	0.02379	0.02504	0.00125	0.00657	0.00782	—	86.7923	86.7923	0.00343	0.01261	0.17257	90.8075
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06754	0.06249	0.05295	0.55638	0.00000	0.00000	0.10598	0.10598	0.00000	0.02484	0.02484	—	102.046	102.046	0.00384	0.00470	0.00960	103.553
Vendor	0.00686	0.00332	0.12554	0.05798	0.00063	0.00125	0.02379	0.02504	0.00125	0.00657	0.00782	—	86.8892	86.8892	0.00343	0.01271	0.00448	90.7671
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01851	0.01719	0.01360	0.14793	0.00000	0.00000	0.02913	0.02913	0.00000	0.00682	0.00682	—	28.6917	28.6917	0.00088	0.00132	0.04486	29.1508
Vendor	0.00195	0.00096	0.03440	0.01591	0.00017	0.00035	0.00656	0.00691	0.00035	0.00181	0.00216	—	24.2995	24.2995	0.00096	0.00356	0.02087	25.4044
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00338	0.00314	0.00248	0.02700	0.00000	0.00000	0.00532	0.00532	0.00000	0.00124	0.00124	—	4.75024	4.75024	0.00015	0.00022	0.00743	4.82625
Vendor	0.00036	0.00018	0.00628	0.00290	0.00003	0.00006	0.00120	0.00126	0.00006	0.00033	0.00040	—	4.02306	4.02306	0.00016	0.00059	0.00346	4.20598
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5. Paving (2028)

3.5.1. Onsite - 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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81550	0.68524	6.62754	9.90989	0.01395	0.25554	—	0.25554	0.23510	—	0.23510	—	1,511.03	1,511.03	0.06129	0.01226	—	1,516.22
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04468	0.03755	0.36315	0.54301	0.00076	0.01400	—	0.01400	0.01288	—	0.01288	—	82.7962	82.7962	0.00336	0.00067	—	83.0803
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00815	0.00685	0.06628	0.09910	0.00014	0.00256	—	0.00256	0.00235	—	0.00235	—	13.7079	13.7079	0.00056	0.00011	—	13.7549
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5.2. Offsite - 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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06495	0.06050	0.03844	0.55254	0.00000	0.00000	0.10036	0.10036	0.00000	0.02353	0.02353	—	102.496	102.496	0.00578	0.00412	0.35155	104.221
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00343	0.00319	0.00252	0.02743	0.00000	0.00000	0.00540	0.00540	0.00000	0.00126	0.00126	—	5.32004	5.32004	0.00016	0.00024	0.00832	5.40517
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00063	0.00058	0.00046	0.00501	0.00000	0.00000	0.00099	0.00099	0.00000	0.00023	0.00023	—	0.88079	0.88079	0.00003	0.00004	0.00138	0.89489
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.6. Architectural Coating (2028)

3.6.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12985	0.10731	0.80814	1.11833	0.00173	0.01536	—	0.01536	0.01413	—	0.01413	—	133.517	133.517	0.00542	0.00108	—	133.975

Architectural	114.118	114.118	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00711	0.00588	0.04428	0.06128	0.00009	0.00084	—	0.00084	0.00077	—	0.00077	—	7.31600	7.31600	0.00030	0.00006	—	7.34111
Architectural Coatings	6.25305	6.25305	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00130	0.00107	0.00808	0.01118	0.00002	0.00015	—	0.00015	0.00014	—	0.00014	—	1.21125	1.21125	0.00005	0.00001	—	1.21540
Architectural Coatings	1.14118	1.14118	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.6.2. Offsite - 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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01372	0.01278	0.00812	0.11670	0.00000	0.00000	0.02120	0.02120	0.00000	0.00497	0.00497	—	21.6471	21.6471	0.00122	0.00087	0.07425	22.0114
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00072	0.00067	0.00053	0.00579	0.00000	0.00000	0.00114	0.00114	0.00000	0.00027	0.00027	—	1.12359	1.12359	0.00003	0.00005	0.00176	1.14157
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00013	0.00012	0.00010	0.00106	0.00000	0.00000	0.00021	0.00021	0.00000	0.00005	0.00005	—	0.18602	0.18602	0.00001	0.00001	0.00029	0.18900
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7. Demolition (2027)

3.7.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	2.63907	2.21478	19.9005	18.6307	0.03253	0.79594	—	0.79594	0.73226	—	0.73226	—	3,426.90	3,426.90	0.13901	0.02780	—	3,438.66
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14461	0.12136	1.09044	1.02086	0.00178	0.04361	—	0.04361	0.04012	—	0.04012	—	187.775	187.775	0.00762	0.00152	—	188.420
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02639	0.02215	0.19901	0.18631	0.00033	0.00796	—	0.00796	0.00732	—	0.00732	—	31.0883	31.0883	0.00126	0.00025	—	31.1950
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06594	0.06083	0.05394	0.56004	0.00000	0.00000	0.10036	0.10036	0.00000	0.02353	0.02353	—	98.4149	98.4149	0.00677	0.00445	0.00994	99.9215
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00358	0.00331	0.00273	0.02933	0.00000	0.00000	0.00540	0.00540	0.00000	0.00126	0.00126	—	5.41791	5.41791	0.00035	0.00024	0.00905	5.50852
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00065	0.00060	0.00050	0.00535	0.00000	0.00000	0.00099	0.00099	0.00000	0.00023	0.00023	—	0.89700	0.89700	0.00006	0.00004	0.00150	0.91200
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	1/30/2027	2/13/2027	5.00000	10.00000	—
Grading	Grading	2/14/2027	3/28/2027	5.00000	30.0000	—
Building Construction	Building Construction	3/29/2027	5/22/2028	5.00000	300.000	—
Paving	Paving	5/23/2028	6/20/2028	5.00000	20.0000	—
Architectural Coating	Architectural Coating	6/21/2028	7/19/2028	5.00000	20.0000	—
Demolition	Demolition	1/1/2027	1/29/2027	5.00000	20.0000	—

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
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00000	8.00000	367.000	0.40000
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00000	8.00000	84.0000	0.37000
Grading	Excavators	Diesel	Average	2.00000	8.00000	36.0000	0.38000
Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000
Grading	Scrapers	Diesel	Average	2.00000	8.00000	423.000	0.48000
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00000	8.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	7.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	3.00000	8.00000	82.0000	0.20000
Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00000	7.00000	84.0000	0.37000
Building Construction	Welders	Diesel	Average	1.000000	8.00000	46.0000	0.45000
Paving	Pavers	Diesel	Average	2.00000	8.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Average	2.00000	8.00000	89.0000	0.36000

Paving	Rollers	Diesel	Average	2.00000	8.00000	36.0000	0.38000
Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Demolition	Excavators	Diesel	Average	3.00000	8.00000	36.0000	0.38000
Demolition	Rubber Tired Dozers	Diesel	Average	2.00000	8.00000	367.000	0.40000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	17.5000	9.47000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	6.03000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	20.0000	9.47000	LDA,LDT1,LDT2
Grading	Vendor	—	6.03000	HHDT,MHDT
Grading	Hauling	0.00000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	15.8400	9.47000	LDA,LDT1,LDT2
Building Construction	Vendor	4.70360	6.03000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15.0000	9.47000	LDA,LDT1,LDT2
Paving	Vendor	—	6.03000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	3.16800	9.47000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.03000	HHDT,MHDT

Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Demolition	Worker	15.0000	9.47000	LDA,LDT1,LDT2
Demolition	Vendor	—	6.03000	HHDT,MHDT
Demolition	Hauling	0.00000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

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	173,745	57,915.0	0.00000	0.00000	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	15.0000	0.00000	0.00000
Grading	—	—	90.0000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.48485
Demolition	0.00000	0.00000	0.00000	—	0.00000

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Single Family Housing	0.48485	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2027	0.00000	203.983	0.03300	0.00400
2028	0.00000	203.983	0.03300	0.00400

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. Biomass Cover Type

5.18.1.1. Unmitigated

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)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.75000	annual days of extreme heat
Extreme Precipitation	4.10000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	31.3300	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A

Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	13.6154
AQ-PM	2.92470
AQ-DPM	26.3846
Drinking Water	38.7161
Lead Risk Housing	56.6982
Pesticides	0.00000
Toxic Releases	0.53763
Traffic	27.0500
Effect Indicators	—
CleanUp Sites	82.9787
Groundwater	87.4813
Haz Waste Facilities/Generators	30.5890
Impaired Water Bodies	77.2995
Solid Waste	59.1753
Sensitive Population	—
Asthma	35.8549
Cardio-vascular	13.0982
Low Birth Weights	19.9256
Socioeconomic Factor Indicators	—
Education	24.1205
Housing	63.9670
Linguistic	24.7665
Poverty	26.6709
Unemployment	37.7147

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	64.9557295
Employed	60.78532016
Median HI	46.47760811
Education	—
Bachelor's or higher	81.58603875
High school enrollment	100
Preschool enrollment	1.873476197
Transportation	—
Auto Access	57.21801617
Active commuting	87.89939689
Social	—
2-parent households	65.78981137
Voting	70.98678301
Neighborhood	—
Alcohol availability	40.65186706
Park access	81.35506224
Retail density	93.41716925
Supermarket access	64.09598358
Tree canopy	81.52187861
Housing	—
Homeownership	12.72937251
Housing habitability	27.37071731
Low-inc homeowner severe housing cost burden	19.88964455
Low-inc renter severe housing cost burden	39.67663288

Uncrowded housing	84.29359682
Health Outcomes	—
Insured adults	64.90440139
Arthritis	0.0
Asthma ER Admissions	75.6
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	79.6
Cognitively Disabled	32.0
Physically Disabled	36.0
Heart Attack ER Admissions	94.8
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	84.3
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	4.5
SLR Inundation Area	47.2

Children	88.7
Elderly	20.2
English Speaking	64.4
Foreign-born	44.0
Outdoor Workers	70.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	31.0
Traffic Density	1.4
Traffic Access	0.0
Other Indices	—
Hardship	20.0
Other Decision Support	—
2016 Voting	74.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	22.0000
Healthy Places Index Score for Project Location (b)	67.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Characteristics: Project Details	Information provided to Rincon.
Construction: On-Road Fugitive Dust	Information provided to Rincon.
Operations: Road Dust	Information provided to Rincon.

8.4. Construction

8.4.7. On-Road Fugitive Dust

Phase Name	Model Parameter	Units	Default Value	New Value
Site Preparation	Worker Trip Paved	%	52.0000	100.0000
Site Preparation	Vendor Trip Paved	%	52.0000	100.0000
Site Preparation	Hauling Trip Paved	%	52.0000	100.0000
Grading	Worker Trip Paved	%	52.0000	100.0000
Grading	Vendor Trip Paved	%	52.0000	100.0000
Grading	Hauling Trip Paved	%	52.0000	100.0000
Building Construction	Worker Trip Paved	%	52.0000	100.0000
Building Construction	Vendor Trip Paved	%	52.0000	100.0000
Building Construction	Hauling Trip Paved	%	52.0000	100.0000
Paving	Worker Trip Paved	%	52.0000	100.0000
Paving	Vendor Trip Paved	%	52.0000	100.0000
Paving	Hauling Trip Paved	%	52.0000	100.0000
Architectural Coating	Worker Trip Paved	%	52.0000	100.0000

Architectural Coating	Vendor Trip Paved	%	52.0000	100.0000
Architectural Coating	Hauling Trip Paved	%	52.0000	100.0000
Demolition	Worker Trip Paved	%	52.0000	100.0000
Demolition	Vendor Trip Paved	%	52.0000	100.0000
Demolition	Hauling Trip Paved	%	52.0000	100.0000

POU-POE Ordinance Change Project - Construction ADUs ONLY Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	POU-POE Ordinance Change Project - Construction ADUs ONLY
Construction Start Date	1/1/2027
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.80000
Precipitation (days)	27.6000
Location	Monterey County, CA, USA
County	Monterey
City	Monterey
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3238
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.39

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	20.0000	Dwelling Unit	6.49351	39,000.0	234,257	—	66.0000	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

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.	1.26782	1.06136	9.46756	13.2488	0.02368	0.33714	0.05899	0.39613	0.31022	0.01428	0.32450	—	2,487.65	2,487.65	0.10157	0.02720	0.27177	2,498.57
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	52.0079	51.9849	28.0353	28.9327	0.04891	1.17173	7.78332	8.95506	1.07799	3.96740	5.04539	—	5,412.64	5,412.64	0.22280	0.04818	0.01160	5,432.57
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.97175	2.95115	8.05703	10.3734	0.01815	0.30112	0.40847	0.70959	0.27705	0.19241	0.46947	—	1,929.12	1,929.12	0.07922	0.02028	0.09050	1,937.24
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.54234	0.53859	1.47041	1.89315	0.00331	0.05495	0.07455	0.12950	0.05056	0.03512	0.08568	—	319.389	319.389	0.01312	0.00336	0.01498	320.732

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

Includes both onsite and offsite emissions.

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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.26782	1.06136	9.46756	13.2488	0.02368	0.33714	0.05899	0.39613	0.31022	0.01428	0.32450	—	2,487.65	2,487.65	0.10157	0.02720	0.27177	2,498.57
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	3.70871	3.12267	28.0353	28.9327	0.04891	1.17173	7.78332	8.95506	1.07799	3.96740	5.04539	—	5,412.64	5,412.64	0.22280	0.04818	0.01160	5,432.57
2028	52.0079	51.9849	9.00609	13.2145	0.02368	0.30081	0.10036	0.35980	0.27679	0.02353	0.29107	—	2,483.34	2,483.34	0.10056	0.02737	0.00909	2,494.01
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.07999	0.90644	8.05703	10.3734	0.01815	0.30112	0.40847	0.70959	0.27705	0.19241	0.46947	—	1,929.12	1,929.12	0.07922	0.02028	0.09050	1,937.24
2028	2.97175	2.95115	0.95636	1.43521	0.00230	0.03309	0.00944	0.04253	0.03045	0.00224	0.03268	—	246.607	246.607	0.00992	0.00266	0.01559	247.663
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.19710	0.16543	1.47041	1.89315	0.00331	0.05495	0.07455	0.12950	0.05056	0.03512	0.08568	—	319.389	319.389	0.01312	0.00336	0.01498	320.732
2028	0.54234	0.53859	0.17454	0.26193	0.00042	0.00604	0.00172	0.00776	0.00556	0.00041	0.00596	—	40.8286	40.8286	0.00164	0.00044	0.00258	41.0034

2.2.2. Onsite 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	0.00000	0.33657	0.30965	0.00000	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	0.00000	2,405.30
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	3.63178	3.05170	27.9724	28.2794	0.04891	1.17173	7.66623	8.83797	1.07799	3.93995	5.01795	—	5,297.82	5,297.82	0.21490	0.04298	0.00000	5,316.00
2028	52.0017	51.9792	8.92495	12.9352	0.02340	0.30024	0.00000	0.30024	0.27622	0.00000	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	0.00000	2,405.68
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	1.05085	0.88039	8.00290	10.1353	0.01799	0.30079	0.36139	0.66218	0.27673	0.18113	0.45786	—	1,864.88	1,864.88	0.07565	0.01513	0.00000	1,871.28

2028	2.96597	2.94587	0.94887	1.38901	0.00228	0.03306	0.00000	0.03306	0.03041	0.00000	0.03041	—	235.555	235.555	0.00956	0.00191	0.00000	236.363
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.19178	0.16067	1.46053	1.84969	0.00328	0.05489	0.06595	0.12085	0.05050	0.03306	0.08356	—	308.751	308.751	0.01252	0.00250	0.00000	309.811
2028	0.54129	0.53762	0.17317	0.25349	0.00042	0.00603	0.00000	0.00603	0.00555	0.00000	0.00555	—	38.9988	38.9988	0.00158	0.00032	0.00000	39.1326

2.2.3. Offsite 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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.03707	0.03148	0.07663	0.31081	0.00028	0.00057	0.05899	0.05956	0.00057	0.01428	0.01485	—	90.5726	90.5726	0.00433	0.00776	0.27177	93.2642
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.07693	0.07097	0.08556	0.65338	0.00028	0.00057	0.11709	0.11709	0.00057	0.02745	0.02745	—	114.817	114.817	0.00790	0.00792	0.01160	116.575
2028	0.06396	0.05917	0.08113	0.52687	0.00028	0.00057	0.10036	0.10036	0.00057	0.02353	0.02353	—	96.6344	96.6344	0.00364	0.00792	0.00909	98.0619
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.02915	0.02605	0.05414	0.23814	0.00016	0.00032	0.04708	0.04741	0.00032	0.01128	0.01161	—	64.2489	64.2489	0.00357	0.00515	0.09050	65.9644
2028	0.00578	0.00528	0.00749	0.04621	0.00002	0.00003	0.00944	0.00947	0.00003	0.00224	0.00227	—	11.0524	11.0524	0.00036	0.00075	0.01559	11.2998
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.00532	0.00475	0.00988	0.04346	0.00003	0.00006	0.00859	0.00865	0.00006	0.00206	0.00212	—	10.6371	10.6371	0.00059	0.00085	0.01498	10.9212
2028	0.00105	0.00096	0.00137	0.00843	< 0.000005	0.00001	0.00172	0.00173	0.00001	0.00041	0.00041	—	1.82985	1.82985	0.00006	0.00012	0.00258	1.87081

3. Construction Emissions Details

3.1. Site Preparation (2027)

3.1.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.63178	3.05170	27.9724	28.2794	0.04891	1.17173	—	1.17173	1.07799	—	1.07799	—	5,297.82	5,297.82	0.21490	0.04298	—	5,316.00
Dust From Material Movement	—	—	—	—	—	—	7.66623	7.66623	—	3.93995	3.93995	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09950	0.08361	0.76637	0.77478	0.00134	0.03210	—	0.03210	0.02953	—	0.02953	—	145.146	145.146	0.00589	0.00118	—	145.644
Dust From Material Movement	—	—	—	—	—	—	0.21003	0.21003	—	0.10794	0.10794	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01816	0.01526	0.13986	0.14140	0.00024	0.00586	—	0.00586	0.00539	—	0.00539	—	24.0305	24.0305	0.00097	0.00019	—	24.1130

Dust From Material Movement	—	—	—	—	—	—	0.03833	0.03833	—	0.01970	0.01970	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.1.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07693	0.07097	0.06293	0.65338	0.00000	0.00000	0.11709	0.11709	0.00000	0.02745	0.02745	—	114.817	114.817	0.00790	0.00520	0.01160	116.575
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00209	0.00193	0.00159	0.01711	0.00000	0.00000	0.00315	0.00315	0.00000	0.00074	0.00074	—	3.16045	3.16045	0.00021	0.00014	0.00528	3.21330
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00038	0.00035	0.00029	0.00312	0.00000	0.00000	0.00058	0.00058	0.00000	0.00013	0.00013	—	0.52325	0.52325	0.00003	0.00002	0.00087	0.53200
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2. Grading (2027)

3.2.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.88795	1.58640	14.2321	17.2743	0.02733	0.59767	—	0.59767	0.54986	—	0.54986	—	2,960.07	2,960.07	0.12007	0.02401	—	2,970.23
Dust From Material Movement	—	—	—	—	—	—	2.76221	2.76221	—	1.33565	1.33565	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10345	0.08693	0.77984	0.94654	0.00150	0.03275	—	0.03275	0.03013	—	0.03013	—	162.196	162.196	0.00658	0.00132	—	162.752
Dust From Material Movement	—	—	—	—	—	—	0.15135	0.15135	—	0.07319	0.07319	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01888	0.01586	0.14232	0.17274	0.00027	0.00598	—	0.00598	0.00550	—	0.00550	—	26.8534	26.8534	0.00109	0.00022	—	26.9455

Dust From Material Movement	—	—	—	—	—	—	0.02762	0.02762	—	0.01336	0.01336	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06594	0.06083	0.05394	0.56004	0.00000	0.00000	0.10036	0.10036	0.00000	0.02353	0.02353	—	98.4149	98.4149	0.00677	0.00445	0.00994	99.9215
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00358	0.00331	0.00273	0.02933	0.00000	0.00000	0.00540	0.00540	0.00000	0.00126	0.00126	—	5.41791	5.41791	0.00035	0.00024	0.00905	5.50852
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00065	0.00060	0.00050	0.00535	0.00000	0.00000	0.00099	0.00099	0.00000	0.00023	0.00023	—	0.89700	0.89700	0.00006	0.00004	0.00150	0.91200
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3. Building Construction (2027)

3.3.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23076	1.02988	9.39093	12.9379	0.02340	0.33657	—	0.33657	0.30965	—	0.30965	—	2,397.08	2,397.08	0.09724	0.01945	—	2,405.30
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.70329	0.58850	5.36625	7.39311	0.01337	0.19233	—	0.19233	0.17694	—	0.17694	—	1,369.76	1,369.76	0.05556	0.01111	—	1,374.46
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12835	0.10740	0.97934	1.34924	0.00244	0.03510	—	0.03510	0.03229	—	0.03229	—	226.779	226.779	0.00920	0.00184	—	227.557
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03347	0.02983	0.02027	0.28374	0.00000	0.00000	0.04817	0.04817	0.00000	0.01129	0.01129	—	50.1090	50.1090	0.00277	0.00198	0.18357	50.9517
Vendor	0.00359	0.00165	0.05636	0.02707	0.00028	0.00057	0.01081	0.01138	0.00057	0.00299	0.00356	—	40.4637	40.4637	0.00156	0.00578	0.08820	42.3125
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03165	0.02920	0.02589	0.26882	0.00000	0.00000	0.04817	0.04817	0.00000	0.01129	0.01129	—	47.2391	47.2391	0.00325	0.00214	0.00477	47.9623
Vendor	0.00340	0.00151	0.05967	0.02777	0.00028	0.00057	0.01081	0.01138	0.00057	0.00299	0.00356	—	40.5056	40.5056	0.00156	0.00578	0.00229	42.2686
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01791	0.01659	0.01366	0.14680	0.00000	0.00000	0.02704	0.02704	0.00000	0.00633	0.00633	—	27.1205	27.1205	0.00177	0.00122	0.04533	27.5741
Vendor	0.00200	0.00089	0.03342	0.01557	0.00016	0.00032	0.00609	0.00641	0.00032	0.00168	0.00201	—	23.1321	23.1321	0.00089	0.00330	0.02179	24.1600
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00327	0.00303	0.00249	0.02679	0.00000	0.00000	0.00493	0.00493	0.00000	0.00116	0.00116	—	4.49011	4.49011	0.00029	0.00020	0.00750	4.56520
Vendor	0.00036	0.00016	0.00610	0.00284	0.00003	0.00006	0.00111	0.00117	0.00006	0.00031	0.00037	—	3.82979	3.82979	0.00015	0.00055	0.00361	3.99996
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4. Building Construction (2028)

3.4.1. Onsite - 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

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18481	0.99143	8.92495	12.9352	0.02340	0.30024	—	0.30024	0.27622	—	0.27622	—	2,397.46	2,397.46	0.09725	0.01945	—	2,405.68
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07188	0.06015	0.54144	0.78472	0.00142	0.01821	—	0.01821	0.01676	—	0.01676	—	145.443	145.443	0.00590	0.00118	—	145.942
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01312	0.01098	0.09881	0.14321	0.00026	0.00332	—	0.00332	0.00306	—	0.00306	—	24.0797	24.0797	0.00098	0.00020	—	24.1623
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03070	0.02840	0.02407	0.25290	0.00000	0.00000	0.04817	0.04817	0.00000	0.01129	0.01129	—	46.3845	46.3845	0.00175	0.00214	0.00436	47.0697
Vendor	0.00312	0.00151	0.05706	0.02635	0.00028	0.00057	0.01081	0.01138	0.00057	0.00299	0.00356	—	39.4951	39.4951	0.00156	0.00578	0.00204	41.2578
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00182	0.00169	0.00134	0.01458	0.00000	0.00000	0.00287	0.00287	0.00000	0.00067	0.00067	—	2.82722	2.82722	0.00009	0.00013	0.00442	2.87246
Vendor	0.00019	0.00009	0.00339	0.00157	0.00002	0.00003	0.00065	0.00068	0.00003	0.00018	0.00021	—	2.39442	2.39442	0.00009	0.00035	0.00206	2.50329
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00033	0.00031	0.00024	0.00266	0.00000	0.00000	0.00052	0.00052	0.00000	0.00012	0.00012	—	0.46808	0.46808	0.00001	0.00002	0.00073	0.47557
Vendor	0.00004	0.00002	0.00062	0.00029	< 0.000005	0.00001	0.00012	0.00012	0.00001	0.00003	0.00004	—	0.39642	0.39642	0.00002	0.00006	0.00034	0.41445
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5. Paving (2028)

3.5.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.81550	0.68524	6.62754	9.90989	0.01395	0.25554	—	0.25554	0.23510	—	0.23510	—	1,511.03	1,511.03	0.06129	0.01226	—	1,516.22

Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04468	0.03755	0.36315	0.54301	0.00076	0.01400	—	0.01400	0.01288	—	0.01288	—	82.7962	82.7962	0.00336	0.00067	—	83.0803
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00815	0.00685	0.06628	0.09910	0.00014	0.00256	—	0.00256	0.00235	—	0.00235	—	13.7079	13.7079	0.00056	0.00011	—	13.7549
Paving	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06396	0.05917	0.05015	0.52687	0.00000	0.00000	0.10036	0.10036	0.00000	0.02353	0.02353	—	96.6344	96.6344	0.00364	0.00445	0.00909	98.0619
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00343	0.00319	0.00252	0.02743	0.00000	0.00000	0.00540	0.00540	0.00000	0.00126	0.00126	—	5.32004	5.32004	0.00016	0.00024	0.00832	5.40517
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00063	0.00058	0.00046	0.00501	0.00000	0.00000	0.00099	0.00099	0.00000	0.00023	0.00023	—	0.88079	0.88079	0.00003	0.00004	0.00138	0.89489
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.6. Architectural Coating (2028)

3.6.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12985	0.10731	0.80814	1.11833	0.00173	0.01536	—	0.01536	0.01413	—	0.01413	—	133.517	133.517	0.00542	0.00108	—	133.975
Architectural Coatings	51.8719	51.8719	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.00711	0.00588	0.04428	0.06128	0.00009	0.00084	—	0.00084	0.00077	—	0.00077	—	7.31600	7.31600	0.00030	0.00006	—	7.34111
Architectural Coatings	2.84229	2.84229	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00130	0.00107	0.00808	0.01118	0.00002	0.00015	—	0.00015	0.00014	—	0.00014	—	1.21125	1.21125	0.00005	0.00001	—	1.21540
Architectural Coatings	0.51872	0.51872	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.6.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00614	0.00568	0.00481	0.05058	0.00000	0.00000	0.00963	0.00963	0.00000	0.00226	0.00226	—	9.27691	9.27691	0.00035	0.00043	0.00087	9.41394
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.00033	0.00031	0.00024	0.00263	0.00000	0.00000	0.00052	0.00052	0.00000	0.00012	0.00012	—	0.51072	0.51072	0.00002	0.00002	0.00080	0.51890
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00006	0.00006	0.00004	0.00048	0.00000	0.00000	0.00009	0.00009	0.00000	0.00002	0.00002	—	0.08456	0.08456	< 0.000005	< 0.000005	0.00013	0.08591
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7. Demolition (2027)

3.7.1. Onsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.63907	2.21478	19.9005	18.6307	0.03253	0.79594	—	0.79594	0.73226	—	0.73226	—	3,426.90	3,426.90	0.13901	0.02780	—	3,438.66
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14461	0.12136	1.09044	1.02086	0.00178	0.04361	—	0.04361	0.04012	—	0.04012	—	187.775	187.775	0.00762	0.00152	—	188.420

Demoliti	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02639	0.02215	0.19901	0.18631	0.00033	0.00796	—	0.00796	0.00732	—	0.00732	—	31.0883	31.0883	0.00126	0.00025	—	31.1950
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.7.2. Offsite - 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
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06594	0.06083	0.05394	0.56004	0.00000	0.00000	0.10036	0.10036	0.00000	0.02353	0.02353	—	98.4149	98.4149	0.00677	0.00445	0.00994	99.9215
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00358	0.00331	0.00273	0.02933	0.00000	0.00000	0.00540	0.00540	0.00000	0.00126	0.00126	—	5.41791	5.41791	0.00035	0.00024	0.00905	5.50852
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00065	0.00060	0.00050	0.00535	0.00000	0.00000	0.00099	0.00099	0.00000	0.00023	0.00023	—	0.89700	0.89700	0.00006	0.00004	0.00150	0.91200

Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	1/30/2027	2/13/2027	5.00000	10.00000	—
Grading	Grading	2/14/2027	3/14/2027	5.00000	20.0000	—
Building Construction	Building Construction	3/15/2027	1/31/2028	5.00000	230.000	—
Paving	Paving	2/1/2028	2/29/2028	5.00000	20.0000	—
Architectural Coating	Architectural Coating	3/1/2028	3/29/2028	5.00000	20.0000	—
Demolition	Demolition	1/1/2027	1/29/2027	5.00000	20.0000	—

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

Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00000	8.00000	367.000	0.40000
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00000	8.00000	84.0000	0.37000
Grading	Excavators	Diesel	Average	1.000000	8.00000	36.0000	0.38000
Grading	Graders	Diesel	Average	1.000000	8.00000	148.000	0.41000
Grading	Rubber Tired Dozers	Diesel	Average	1.000000	8.00000	367.000	0.40000
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00000	8.00000	84.0000	0.37000
Building Construction	Cranes	Diesel	Average	1.000000	7.00000	367.000	0.29000
Building Construction	Forklifts	Diesel	Average	3.00000	8.00000	82.0000	0.20000
Building Construction	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00000	7.00000	84.0000	0.37000
Building Construction	Welders	Diesel	Average	1.000000	8.00000	46.0000	0.45000
Paving	Pavers	Diesel	Average	2.00000	8.00000	81.0000	0.42000
Paving	Paving Equipment	Diesel	Average	2.00000	8.00000	89.0000	0.36000
Paving	Rollers	Diesel	Average	2.00000	8.00000	36.0000	0.38000
Architectural Coating	Air Compressors	Diesel	Average	1.000000	6.00000	37.0000	0.48000
Demolition	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Demolition	Excavators	Diesel	Average	3.00000	8.00000	36.0000	0.38000
Demolition	Rubber Tired Dozers	Diesel	Average	2.00000	8.00000	367.000	0.40000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	Worker	17.5000	9.47000	LDA,LDT1,LDT2
Site Preparation	Vendor	—	6.03000	HHDT,MHDT
Site Preparation	Hauling	0.00000	20.0000	HHDT

Site Preparation	Onsite truck	—	—	HHDT
Grading	Worker	15.0000	9.47000	LDA,LDT1,LDT2
Grading	Vendor	—	6.03000	HHDT,MHDT
Grading	Hauling	0.00000	20.0000	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	Worker	7.20000	9.47000	LDA,LDT1,LDT2
Building Construction	Vendor	2.13800	6.03000	HHDT,MHDT
Building Construction	Hauling	0.00000	20.0000	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	Worker	15.0000	9.47000	LDA,LDT1,LDT2
Paving	Vendor	—	6.03000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	Worker	1.44000	9.47000	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.03000	HHDT,MHDT
Architectural Coating	Hauling	0.00000	20.0000	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Demolition	Worker	15.0000	9.47000	LDA,LDT1,LDT2
Demolition	Vendor	—	6.03000	HHDT,MHDT
Demolition	Hauling	0.00000	20.0000	HHDT
Demolition	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

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	78,975.0	26,325.0	0.00000	0.00000	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	15.0000	0.00000	0.00000
Grading	—	—	20.0000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.22039
Demolition	0.00000	0.00000	0.00000	—	0.00000

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Single Family Housing	0.22039	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O

2027	0.00000	203.983	0.03300	0.00400
2028	0.00000	203.983	0.03300	0.00400

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. Biomass Cover Type

5.18.1.1. Unmitigated

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)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.75000	annual days of extreme heat
Extreme Precipitation	4.10000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth

Wildfire	31.3300	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A

Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	13.6154
AQ-PM	2.92470
AQ-DPM	26.3846
Drinking Water	38.7161
Lead Risk Housing	56.6982
Pesticides	0.00000
Toxic Releases	0.53763
Traffic	27.0500
Effect Indicators	—
CleanUp Sites	82.9787

Groundwater	87.4813
Haz Waste Facilities/Generators	30.5890
Impaired Water Bodies	77.2995
Solid Waste	59.1753
Sensitive Population	—
Asthma	35.8549
Cardio-vascular	13.0982
Low Birth Weights	19.9256
Socioeconomic Factor Indicators	—
Education	24.1205
Housing	63.9670
Linguistic	24.7665
Poverty	26.6709
Unemployment	37.7147

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	64.9557295
Employed	60.78532016
Median HI	46.47760811
Education	—
Bachelor's or higher	81.58603875
High school enrollment	100
Preschool enrollment	1.873476197
Transportation	—
Auto Access	57.21801617

Active commuting	87.89939689
Social	—
2-parent households	65.78981137
Voting	70.98678301
Neighborhood	—
Alcohol availability	40.65186706
Park access	81.35506224
Retail density	93.41716925
Supermarket access	64.09598358
Tree canopy	81.52187861
Housing	—
Homeownership	12.72937251
Housing habitability	27.37071731
Low-inc homeowner severe housing cost burden	19.88964455
Low-inc renter severe housing cost burden	39.67663288
Uncrowded housing	84.29359682
Health Outcomes	—
Insured adults	64.90440139
Arthritis	0.0
Asthma ER Admissions	75.6
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	79.6
Cognitively Disabled	32.0

Physically Disabled	36.0
Heart Attack ER Admissions	94.8
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	84.3
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	4.5
SLR Inundation Area	47.2
Children	88.7
Elderly	20.2
English Speaking	64.4
Foreign-born	44.0
Outdoor Workers	70.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	31.0
Traffic Density	1.4
Traffic Access	0.0
Other Indices	—
Hardship	20.0
Other Decision Support	—
2016 Voting	74.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	22.0000
Healthy Places Index Score for Project Location (b)	67.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Construction: On-Road Fugitive Dust	Information provided to Rincon.
Operations: Road Dust	Information provided to Rincon.

8.4. Construction

8.4.7. On-Road Fugitive Dust

Phase Name	Model Parameter	Units	Default Value	New Value

Site Preparation	Worker Trip Paved	%	52.0000	100.0000
Site Preparation	Vendor Trip Paved	%	52.0000	100.0000
Site Preparation	Hauling Trip Paved	%	52.0000	100.0000
Grading	Worker Trip Paved	%	52.0000	100.0000
Grading	Vendor Trip Paved	%	52.0000	100.0000
Grading	Hauling Trip Paved	%	52.0000	100.0000
Building Construction	Worker Trip Paved	%	52.0000	100.0000
Building Construction	Vendor Trip Paved	%	52.0000	100.0000
Building Construction	Hauling Trip Paved	%	52.0000	100.0000
Paving	Worker Trip Paved	%	52.0000	100.0000
Paving	Vendor Trip Paved	%	52.0000	100.0000
Paving	Hauling Trip Paved	%	52.0000	100.0000
Architectural Coating	Worker Trip Paved	%	52.0000	100.0000
Architectural Coating	Vendor Trip Paved	%	52.0000	100.0000
Architectural Coating	Hauling Trip Paved	%	52.0000	100.0000
Demolition	Worker Trip Paved	%	52.0000	100.0000
Demolition	Vendor Trip Paved	%	52.0000	100.0000
Demolition	Hauling Trip Paved	%	52.0000	100.0000

POU-POE Ordinance Change Project - Operational ONLY Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	POU-POE Ordinance Change Project - Operational ONLY
Operational Year	2036
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.80000
Precipitation (days)	27.6000
Location	Monterey County, CA, USA
County	Monterey
City	Monterey
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3238
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.38

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	44.0000	Dwelling Unit	14.2857	85,800.0	515,366	—	125.000	—

Single Family Housing	200.000	Dwelling Unit	64.9351	390,000	2,342,571	—	568.000	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.3. 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.	26.1088	25.4414	9.38982	50.1706	0.11111	1.61158	5.97012	7.58171	1.60793	1.51277	3.12070	231.619	15,183.6	15,415.2	13.6928	0.39879	11.3719	15,887.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	24.8292	24.2004	9.73093	38.5744	0.10796	1.60543	5.97012	7.57555	1.60328	1.51277	3.11604	231.619	14,888.2	15,119.8	13.7577	0.43272	3.61419	15,596.3
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	23.3245	21.3708	7.25202	53.0073	0.14855	2.73544	5.73317	8.46861	2.65284	1.45308	4.10592	685.356	11,419.0	12,104.4	16.2555	0.39665	6.76986	12,635.7
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.25672	3.90017	1.32349	9.67383	0.02711	0.49922	1.04630	1.54552	0.48414	0.26519	0.74933	113.469	1,890.55	2,004.02	2.69129	0.06567	1.12083	2,091.99

2.4. 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	5.90923	5.66611	2.64508	25.7056	0.05937	0.03332	5.97012	6.00344	0.03117	1.51277	1.54393	—	6,040.01	6,040.01	0.31890	0.30452	7.96426	6,146.69
Area	19.9119	19.6314	4.28663	23.4190	0.03605	1.37953	—	1.37953	1.37803	—	1.37803	103.700	5,077.45	5,181.15	0.10893	0.02223	—	5,190.50
Energy	0.28765	0.14382	2.45810	1.04600	0.01569	0.19874	—	0.19874	0.19874	—	0.19874	—	3,946.93	3,946.93	0.40989	0.02209	—	3,963.76
Water	—	—	—	—	—	—	—	—	—	—	—	19.5474	119.222	138.769	2.02365	0.04996	—	204.249
Waste	—	—	—	—	—	—	—	—	—	—	—	108.372	0.00000	108.372	10.8314	0.00000	—	379.157
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.40768	3.40768
Total	26.1088	25.4414	9.38982	50.1706	0.11111	1.61158	5.97012	7.58171	1.60793	1.51277	3.12070	231.619	15,183.6	15,415.2	13.6928	0.39879	11.3719	15,887.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.89521	5.62337	3.11396	28.0220	0.05682	0.03335	5.97012	6.00347	0.03120	1.51277	1.54396	—	5,781.59	5,781.59	0.38539	0.33875	0.20651	5,892.38
Area	18.6464	18.4332	4.15888	9.50642	0.03545	1.37334	—	1.37334	1.37334	—	1.37334	103.700	5,040.44	5,144.14	0.10738	0.02192	—	5,153.36
Energy	0.28765	0.14382	2.45810	1.04600	0.01569	0.19874	—	0.19874	0.19874	—	0.19874	—	3,946.93	3,946.93	0.40989	0.02209	—	3,963.76
Water	—	—	—	—	—	—	—	—	—	—	—	19.5474	119.222	138.769	2.02365	0.04996	—	204.249
Waste	—	—	—	—	—	—	—	—	—	—	—	108.372	0.00000	108.372	10.8314	0.00000	—	379.157
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.40768	3.40768
Total	24.8292	24.2004	9.73093	38.5744	0.10796	1.60543	5.97012	7.57555	1.60328	1.51277	3.11604	231.619	14,888.2	15,119.8	13.7577	0.43272	3.61419	15,596.3
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.66851	5.41613	2.85315	25.3607	0.05572	0.03259	5.73317	5.76576	0.03048	1.45308	1.48356	—	5,670.38	5,670.38	0.34711	0.31719	3.36218	5,776.94
Area	17.3683	15.8108	1.94078	26.6006	0.07714	2.50411	—	2.50411	2.42362	—	2.42362	557.437	1,682.48	2,239.92	2.64349	0.00742	—	2,308.22
Energy	0.28765	0.14382	2.45810	1.04600	0.01569	0.19874	—	0.19874	0.19874	—	0.19874	—	3,946.93	3,946.93	0.40989	0.02209	—	3,963.76
Water	—	—	—	—	—	—	—	—	—	—	—	19.5474	119.222	138.769	2.02365	0.04996	—	204.249
Waste	—	—	—	—	—	—	—	—	—	—	—	108.372	0.00000	108.372	10.8314	0.00000	—	379.157
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.40768	3.40768
Total	23.3245	21.3708	7.25202	53.0073	0.14855	2.73544	5.73317	8.46861	2.65284	1.45308	4.10592	685.356	11,419.0	12,104.4	16.2555	0.39665	6.76986	12,635.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	1.03450	0.98844	0.52070	4.62833	0.01017	0.00595	1.04630	1.05225	0.00556	0.26519	0.27075	—	938.797	938.797	0.05747	0.05251	0.55665	956.439
Area	3.16972	2.88548	0.35419	4.85461	0.01408	0.45700	—	0.45700	0.44231	—	0.44231	92.2900	278.554	370.844	0.43766	0.00123	—	382.151
Energy	0.05250	0.02625	0.44860	0.19089	0.00286	0.03627	—	0.03627	0.03627	—	0.03627	—	653.460	653.460	0.06786	0.00366	—	656.246
Water	—	—	—	—	—	—	—	—	—	—	—	3.23629	19.7386	22.9748	0.33504	0.00827	—	33.8157
Waste	—	—	—	—	—	—	—	—	—	—	—	17.9422	0.00000	17.9422	1.79326	0.00000	—	62.7737
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.56418	0.56418
Total	4.25672	3.90017	1.32349	9.67383	0.02711	0.49922	1.04630	1.54552	0.48414	0.26519	0.74933	113.469	1,890.55	2,004.02	2.69129	0.06567	1.12083	2,091.99

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	5.90923	5.66611	2.64508	25.7056	0.05937	0.03332	5.97012	6.00344	0.03117	1.51277	1.54393	—	6,040.01	6,040.01	0.31890	0.30452	7.96426	6,146.69
Total	5.90923	5.66611	2.64508	25.7056	0.05937	0.03332	5.97012	6.00344	0.03117	1.51277	1.54393	—	6,040.01	6,040.01	0.31890	0.30452	7.96426	6,146.69
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	5.89521	5.62337	3.11396	28.0220	0.05682	0.03335	5.97012	6.00347	0.03120	1.51277	1.54396	—	5,781.59	5,781.59	0.38539	0.33875	0.20651	5,892.38
Total	5.89521	5.62337	3.11396	28.0220	0.05682	0.03335	5.97012	6.00347	0.03120	1.51277	1.54396	—	5,781.59	5,781.59	0.38539	0.33875	0.20651	5,892.38
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	1.03450	0.98844	0.52070	4.62833	0.01017	0.00595	1.04630	1.05225	0.00556	0.26519	0.27075	—	938.797	938.797	0.05747	0.05251	0.55665	956.439
Total	1.03450	0.98844	0.52070	4.62833	0.01017	0.00595	1.04630	1.05225	0.00556	0.26519	0.27075	—	938.797	938.797	0.05747	0.05251	0.55665	956.439

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	—	—	—	—	—	—	—	—	—	—	—	—	826.806	826.806	0.13376	0.01621	—	834.982
Total	—	—	—	—	—	—	—	—	—	—	—	—	826.806	826.806	0.13376	0.01621	—	834.982
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	826.806	826.806	0.13376	0.01621	—	834.982
Total	—	—	—	—	—	—	—	—	—	—	—	—	826.806	826.806	0.13376	0.01621	—	834.982
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	136.887	136.887	0.02215	0.00268	—	138.241
Total	—	—	—	—	—	—	—	—	—	—	—	—	136.887	136.887	0.02215	0.00268	—	138.241

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	0.28765	0.14382	2.45810	1.04600	0.01569	0.19874	—	0.19874	0.19874	—	0.19874	—	3,120.13	3,120.13	0.27613	0.00588	—	3,128.78
Total	0.28765	0.14382	2.45810	1.04600	0.01569	0.19874	—	0.19874	0.19874	—	0.19874	—	3,120.13	3,120.13	0.27613	0.00588	—	3,128.78
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.28765	0.14382	2.45810	1.04600	0.01569	0.19874	—	0.19874	0.19874	—	0.19874	—	3,120.13	3,120.13	0.27613	0.00588	—	3,128.78
Total	0.28765	0.14382	2.45810	1.04600	0.01569	0.19874	—	0.19874	0.19874	—	0.19874	—	3,120.13	3,120.13	0.27613	0.00588	—	3,128.78
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.05250	0.02625	0.44860	0.19089	0.00286	0.03627	—	0.03627	0.03627	—	0.03627	—	516.572	516.572	0.04572	0.00097	—	518.005
Total	0.05250	0.02625	0.44860	0.19089	0.00286	0.03627	—	0.03627	0.03627	—	0.03627	—	516.572	516.572	0.04572	0.00097	—	518.005

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	7.44438	7.23124	4.15888	9.50642	0.03545	1.37334	—	1.37334	1.37334	—	1.37334	103.700	5,040.44	5,144.14	0.10738	0.02192	—	5,153.36

Consumer Products	10.1821	10.1821	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	1.01988	1.01988	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.26551	1.19819	0.12776	13.9126	0.00060	0.00619	—	0.00619	0.00469	—	0.00469	—	37.0117	37.0117	0.00155	0.00031	—	37.1419
Total	19.9119	19.6314	4.28663	23.4190	0.03605	1.37953	—	1.37953	1.37803	—	1.37803	103.700	5,077.45	5,181.15	0.10893	0.02223	—	5,190.50
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	7.44438	7.23124	4.15888	9.50642	0.03545	1.37334	—	1.37334	1.37334	—	1.37334	103.700	5,040.44	5,144.14	0.10738	0.02192	—	5,153.36
Consumer Products	10.1821	10.1821	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	1.01988	1.01988	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	18.6464	18.4332	4.15888	9.50642	0.03545	1.37334	—	1.37334	1.37334	—	1.37334	103.700	5,040.44	5,144.14	0.10738	0.02192	—	5,153.36
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.96717	0.69134	0.33822	3.11553	0.01400	0.45623	—	0.45623	0.44172	—	0.44172	92.2900	274.357	366.647	0.43748	0.00119	—	377.940
Consumer Products	1.85824	1.85824	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.18613	0.18613	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	0.15819	0.14977	0.01597	1.73907	0.00008	0.00077	—	0.00077	0.00059	—	0.00059	—	4.19706	4.19706	0.00018	0.00003	—	4.21182
Total	3.16972	2.88548	0.35419	4.85461	0.01408	0.45700	—	0.45700	0.44231	—	0.44231	92.2900	278.554	370.844	0.43766	0.00123	—	382.151

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	—	—	—	—	—	—	—	—	—	—	—	19.5474	119.222	138.769	2.02365	0.04996	—	204.249
Total	—	—	—	—	—	—	—	—	—	—	—	19.5474	119.222	138.769	2.02365	0.04996	—	204.249
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	19.5474	119.222	138.769	2.02365	0.04996	—	204.249
Total	—	—	—	—	—	—	—	—	—	—	—	19.5474	119.222	138.769	2.02365	0.04996	—	204.249
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.23629	19.7386	22.9748	0.33504	0.00827	—	33.8157
Total	—	—	—	—	—	—	—	—	—	—	—	3.23629	19.7386	22.9748	0.33504	0.00827	—	33.8157

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	—	—	—	—	—	—	—	—	—	—	—	108.372	0.00000	108.372	10.8314	0.00000	—	379.157
Total	—	—	—	—	—	—	—	—	—	—	—	108.372	0.00000	108.372	10.8314	0.00000	—	379.157
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	108.372	0.00000	108.372	10.8314	0.00000	—	379.157
Total	—	—	—	—	—	—	—	—	—	—	—	108.372	0.00000	108.372	10.8314	0.00000	—	379.157
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	17.9422	0.00000	17.9422	1.79326	0.00000	—	62.7737
Total	—	—	—	—	—	—	—	—	—	—	—	17.9422	0.00000	17.9422	1.79326	0.00000	—	62.7737

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.40768	3.40768
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.40768	3.40768
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.40768	3.40768
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.40768	3.40768
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.56418	0.56418
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.56418	0.56418

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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. 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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. 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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. 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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

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	415.360	419.760	376.200	149,794	1,511.92	1,527.94	1,369.38	545,254
Single Family Housing	1,888.00	1,908.00	1,710.00	680,881	6,872.38	6,945.18	6,224.45	2,478,429

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Single Family Housing	Wood Fireplaces	1	1
Single Family Housing	Gas Fireplaces	40	40
Single Family Housing	Propane Fireplaces	3	3
Single Family Housing	Electric Fireplaces	0	0
Single Family Housing	No Fireplaces	0	0

Single Family Housing	Conventional Wood Stoves	0	0
Single Family Housing	Catalytic Wood Stoves	2	2
Single Family Housing	Non-Catalytic Wood Stoves	2	2
Single Family Housing	Pellet Wood Stoves	3	3
Single Family Housing	Wood Fireplaces	6	6
Single Family Housing	Gas Fireplaces	180	180
Single Family Housing	Propane Fireplaces	14	14
Single Family Housing	Electric Fireplaces	0	0
Single Family Housing	No Fireplaces	0	0
Single Family Housing	Conventional Wood Stoves	0	0
Single Family Housing	Catalytic Wood Stoves	10	10
Single Family Housing	Non-Catalytic Wood Stoves	10	10
Single Family Housing	Pellet Wood Stoves	14	14

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)
963,495	321,165	0.00000	0.00000	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00000
Summer Days	day/yr	250.000

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	266,788	203.983	0.0330	0.0040	1,755,605
Single Family Housing	1,212,671	203.983	0.0330	0.0040	7,980,024

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	1,839,512	7,371,293
Single Family Housing	8,361,420	33,505,854

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	36.2705	0.00000
Single Family Housing	164.813	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	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	2,088.00	0.00225	2.50000	2.50000	10.00000
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430.00	0.11538	0.60000	0.00000	1.000000

Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088.00	0.00225	2.50000	2.50000	10.00000
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430.00	0.11538	0.60000	0.00000	1.000000

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

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. Biomass Cover Type

5.18.1.1. Unmitigated

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)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.75000	annual days of extreme heat
Extreme Precipitation	4.10000	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	31.3300	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A

Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	13.6154
AQ-PM	2.92470
AQ-DPM	26.3846
Drinking Water	38.7161
Lead Risk Housing	56.6982
Pesticides	0.00000
Toxic Releases	0.53763
Traffic	27.0500
Effect Indicators	—
CleanUp Sites	82.9787
Groundwater	87.4813
Haz Waste Facilities/Generators	30.5890
Impaired Water Bodies	77.2995
Solid Waste	59.1753
Sensitive Population	—
Asthma	35.8549
Cardio-vascular	13.0982
Low Birth Weights	19.9256
Socioeconomic Factor Indicators	—
Education	24.1205
Housing	63.9670
Linguistic	24.7665
Poverty	26.6709
Unemployment	37.7147

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	64.9557295
Employed	60.78532016
Median HI	46.47760811
Education	—
Bachelor's or higher	81.58603875
High school enrollment	100
Preschool enrollment	1.873476197
Transportation	—
Auto Access	57.21801617
Active commuting	87.89939689
Social	—
2-parent households	65.78981137
Voting	70.98678301
Neighborhood	—
Alcohol availability	40.65186706
Park access	81.35506224
Retail density	93.41716925
Supermarket access	64.09598358
Tree canopy	81.52187861
Housing	—
Homeownership	12.72937251
Housing habitability	27.37071731
Low-inc homeowner severe housing cost burden	19.88964455
Low-inc renter severe housing cost burden	39.67663288

Uncrowded housing	84.29359682
Health Outcomes	—
Insured adults	64.90440139
Arthritis	0.0
Asthma ER Admissions	75.6
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	79.6
Cognitively Disabled	32.0
Physically Disabled	36.0
Heart Attack ER Admissions	94.8
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	84.3
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	4.5
SLR Inundation Area	47.2

Children	88.7
Elderly	20.2
English Speaking	64.4
Foreign-born	44.0
Outdoor Workers	70.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	31.0
Traffic Density	1.4
Traffic Access	0.0
Other Indices	—
Hardship	20.0
Other Decision Support	—
2016 Voting	74.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	22.0000
Healthy Places Index Score for Project Location (b)	67.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Information provided to Rincon.
Construction: Construction Phases	Information provided to Rincon.
Construction: On-Road Fugitive Dust	Information provided to Rincon.
Operations: Road Dust	Information provided to Rincon.

8.3. Land Use

Model Parameter	Units	Default Value	New Value
Population	people	146.000	125.000
Population	people	664.000	568.000

8.5. Operations

8.5.1. Mobile Sources

8.5.1.4. Road Dust

Model Parameter	Units	Default Value	New Value
% Paved	%	52.0000	100.0000