Final
Environmental Impact Report
(SCH No. 2019011044)

For The

DSRT SURF SPECIFIC PLAN

PREPARED FOR

CITY OF PALM DESERT
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PREPARED BY

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1.0 INTRODUCTION

1.1 Introduction

This Final Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (Public Resources Code §§21000-21189.3) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, §§15000-15387).

The Final EIR includes the Draft EIR, written comments received during the public comment period, responses to those comments, and changes or errata to the Draft EIR. The City of Palm Desert (City) prepared this EIR to evaluate the potential environmental impacts associated with the construction and operation of the proposed DSRT SURF project. The City is the Lead Agency for the Project.

According to State CEQA Guidelines §15089, the requirements for a Final Environmental Impact Report are:

a) *The Lead Agency shall prepare a final EIR before approving the project. The contents of a final EIR are specified in Section 15132 of these Guidelines.*

b) *Lead Agencies may provide an opportunity for review of the final EIR by the public or by commenting agencies before approving the project. The review of a final EIR should focus on the responses to comments on the draft EIR.*

1.2 Organization of the Final EIR

As directed by CEQA Guidelines §15132, the Final EIR consists of three sections:

Section 1 – Introduction. This Section provides an introduction and summarizes the CEQA requirements for preparation of responses to substantive public comments on the Draft EIR.

Section 2 – Response to Comments. This Section includes comments received during the public comment period and the City's response to each comment. Where the same question or concern has been raised by multiple commenters, the first instance when the comment was addressed is referenced in the response.

Section 3 – Changes to the Draft EIR. Changes to the EIR's text resulting from comments and their responses are provided in this section.

1.3 Draft EIR Public Review Period

The Draft EIR was released for public comment on May 21, 2019. The document was sent to the California State Clearinghouse, public agencies, and individuals who had expressed an interest or requested to receive the Draft EIR. In addition, a Notice of Completion/Notice of Availability was published in the Desert Sun. The Notice of Completion/Notice of Availability was also sent to the Riverside County Clerk. Copies of the Draft EIR were also made available at Palm Desert City Hall, on-line at the City's website, and at the City's library.

The public comment period ended on July 5, 2019. During the public review period, the City received a total of 6 comments in the form of letters and emails.

1.4 Certification of the Environmental Impact Report and Project Selection Process

The City of Palm Desert City Council will consider the EIR at a meeting on November 14, 2019. In order to certify the Final EIR, CEQA Guidelines §15090 prescribe that the City Council must find that:

a) The Final EIR has been completed in compliance with CEQA;

b) The Final EIR was presented to the decision-making body and that the decision-making body reviewed and considered the information contained in the Final EIR; and

c) The Final EIR reflects the Lead Agency's independent judgment and analysis.

If the City Council certifies the Final EIR, it can then consider approving the project, in whole or in part.

1.5 Consideration of Recirculation

CEQA Guidelines §15088.5 requires a Lead Agency to recirculate a revised EIR only if significant new information is identified following the release of the Draft EIR. "Significant new information" can include, changes in the project or environmental setting as well as additional data or other information, for example, a new significant environmental impact or a substantial increase in the severity of an environmental impact. New information is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the proponent has declined to implement.

The City has evaluated the information contained in this Final EIR as well as all other information in the record, and has determined that no significant new information has been added to the EIR after public notice was given of the availability of the Draft EIR for public review. Therefore, CEQA does not require recirculation of the Draft EIR.

2.0 RESPONSE TO COMMENTS

2.1 Introduction

The Response to Comments on the Draft EIR for the Project has been prepared in accordance with CEQA Guidelines Sections 15088, 15089 and 15132. This Section of the Final EIR contains reproductions of all comments received during the public comment period.

The following comments were received on the Draft EIR from various public agencies and interested parties. These comments address aspects of the Project or Draft EIR, including clarification of information, comments upon the adequacy of environmental analysis, and similar issues. The complete letter or email is included Appendix A. If the letter or email included attachments, these are provided as well. Each letter or email has been provided brackets identifying each specific comment for which a response is provided and a corresponding comment identification number. Following each comment is a specific response that matches the comment number.

A list of all comments received is provided in Table 2-1. Individual comments and the City's responses follow.

Table 2-1
Master List of Comments Received

Assigned Letter	Commenter Name	Agency / Affiliation / City of Residence
A		State of California Governor's Office of Planning and Research State Clearinghouse and Planning Unit
B	Paul Rull	Riverside County Airport Land Use Commission
C	Heather Pert for Scott Wilson	California Department of Fish and Wildlife
D	Lijin Sun, J.D.	South Coast Air Quality Management District
E	John Belcher	Law Offices of John Belcher
F	Liridona Leti	Palm Desert resident

2.2 Response to Comments

A. Governor's Office of Planning & Research, State Clearinghouse

Comment A-1 The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 7/5/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: https://ceqanet.opr.ca.gov/2019 011044/2. Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly**.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response A-1 The City thanks the State Clearinghouse for assisting it in complying with CEQA. The City has checked the Clearinghouse database, and found that one comment letter was submitted, from the California Department of Fish and Wildlife. That letter is responded to below, as Comment Letter C.

B. Riverside County Airport Land Use Commission (ALUC)

Comment B-1 Thank you for transmitting the above project to ALUC for review. Please note that the project is located outside the airport influence area, and therefore ALUC has no official comment on the project.

Response B-1 The City thanks ALUC for participating in the review of the EIR, and acknowledges that the project is located outside the airport influence area of the Bermuda Dunes Airport.

Comment B-2 However, I wanted to let you know that ALUC is currently reviewing a similar "surf lagoon" project (ZAP1046TH19) in the unincorporated County area of Jacqueline Cochran Airport that is tentatively scheduled for a public hearing meeting on June 13, 2019. The staff report for this project can be viewed on the ALUC website here http://www.rcaluc.org/Agendas/Meeting-Agendas about 1-2 weeks before the meeting. In the report, ALUC staff analyzes a biological wildlife hazard study for the potential impact of the "surf lagoon" on aircraft via bird strikes. The study proposes several mitigations (sic) measures to help minimize the occurrences of aircraft bird strikes.

The City may find this information useful when considering the DSRT Surf project.

Response B-2 The City thanks ALUC for providing the information relating to the project located to the Jacqueline Cochran Airport in Thermal. However, because the proposed Project is not within an area of low-flying aircraft, bird strikes are not anticipated to be an impact of the proposed Project.

C. California Department of Fish and Wildlife

Comment C-1 The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of Palm Desert for the DSRT SURF Specific Plan, Precise Plan, Tentative Tract Map 37369 and Associated Disposition and Development Agreement (SP 18-0002 and PP18-0009) Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

Response C-1 The City thanks the Department for participating in the review of the EIR, and acknowledges its role in providing comments germane to the Fish and Game Code.

Comment C-2 **CDFW ROLE**

CDFW is California's **Trustee Agency** for fish and wildlife resources , and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code , § 21070; CEQA Guidelines§ 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. *(Id.,* § 1802.) Similarly for purposes of CEQA , CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines,§ 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result

in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code,§ 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

Response C-2 The City acknowledges the Department's role as both a Trustee and Responsible Agency, and recognizes its role in the CEQA process.

Comment C-3 The CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The CDFW offers the comments and recommendations presented below to assist the City of Palm Desert (City; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed project with respect to impacts on biological resources and the project's consistency with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).

The CDFW's comments and recommendations on the DEIR include:

Project Description

The Project Description on pp. 1-2 through 1-6 of the DEIR lacks a description of the timing of operation of the wave machines. Artificial water bodies in desert climates often act as attractants to waterfowl (e.g., Canada geese). If the surf lagoon wave machines are idle for extended periods, waterfowl may establish residence at the surf lagoon, thereby creating a potential human-wildlife conflict between waterfowl and surf lagoon customers. CDFW recommends that the Project Description be revised to include a description of the frequency, timing, and duration of the wave generating equipment operation.

Response C-3 The hours of operations of the wave machine are provided on page 1-6, as the first row of the "Surf Lagoon Operational Details." In that sub-section, the hours are stated as 6 AM to 12 AM for wave machine/surf pool operations. Therefore, the surf pool will be inactive for a period of 6 hours every night (from midnight to 6 AM). It is therefore unlikely, given that most waterfowl are diurnal, rather than nocturnal, that they would establish residency on the pool on any given night. Further, when the wave machine is operational,

surfers will also be in the water. Much like the experience of surfing on the Pacific Ocean, waterfowl tend to avoid human contact, and their extended presence on the lagoon is unlikely. The Department's recommendation to add operation data is noted, but no change is required since the information is already provided in the Draft EIR.

Comment C-4 Though not identified in the Project Description, CDFW assumes that the water in the surf lagoon will be chlorinated. This information should be clarified, given that mosquito abatement may be necessary if the water is not treated and is proposed to remain undisturbed for extended periods of time (for example, when the wave machines are idle). CDFW recommends that the Project Description clearly identify any proposed mosquito abatement activities, or describe why such activities will be unnecessary.

Response C-4 Please see Response C-3 as it relates to operation of the surf lagoon. The surf lagoon will be treated to meet County standards for such facilities, and as noted above, the wave machine will be inactive for up to 6 hours per night. Further, when the wave machine is inactive, filtration will continue, and much like a swimming pool, standing water will not occur. As a result, there will be no need for mosquito abatement activities.

Comment C-5 <u>Environmental Setting, Impacts, and Mitigation, Biological Resources Section, Subsection 2.4.6 (Project Impacts) and 2.4.7 (Mitigation Measures)</u>

Subsection 2.4.6 (Impacts) on pp. 2.4-19 through 2.4-21 of the DEIR lacks a description of the possibility of waterfowl establishing residence at the surf lagoon during Project operation when wave machines are idle for extended periods of time. CDFW recommends that a Contingency Plan be developed and included as a Mitigation Measure in Subsection 2.4.7 to minimize human-wildlife conflicts if waterfowl are attracted to the surf lagoon.

Response C-5 Please see Response C-3. The wave motion and human activity on the surf lagoon will prevent waterfowl from establishing residence on the lagoon, and there is no need for a "contingency plan" to minimize human-wildlife conflicts. For clarity, the following addition will be made to page 2.4.20:

"Tables 2.4.1 through 2.4.3 summarize information on all special-status species that have been reported in the Project vicinity, or that have the potential to occur onsite based on geographic distribution and presence of potentially suitable habitat. Given the level of existing disturbance onsite from parking lot development, grading, installation of irrigation systems, development of surrounding parcels, and daily disturbances of human activity

on the adjacent Desert Willow Golf Resort, there is a low potential for the proposed Project to adversely impact sensitive biological species. Furthermore, the Surf Lagoon component of the Project will operate daily from 6 AM to 12 AM, resulting in constant motion on the surf lagoon. This water activity, combined with the human activity associated with surfers, will prevent water fowl from taking up residence in the Surf Lagoon."

Comment C-6 Environmental Setting, Impacts, and Mitigation, Hydrology and Water Quality Section, Subsection 2.10.5 (Existing Conditions)

It is stated on p. 2.10-8 of the DEIR that "If required, the surf lagoon water will be treated before being sent to the evacuation line." The evacuation line carries discharge to the existing golf course lake. CDFW was unable to locate a definition for "treated" within the DEIR. Given that the water will be discharged to a lake accessible by wildlife, CDFW recommends that a definition of "treated" be included in the DEIR to provide public review and comment for any potential impacts to fish and wildlife resources. CDFW recommends that the definition clearly identify how the water may be treated, what would trigger treatment, and the chemical constituents proposed to be used, if chemical treatment is deemed necessary.

Response C-6 The use of the term "treated" in the DEIR does not include chemical treatment. Water treatment throughout the Project, as described on pages 2.10-13 through 2.10-18, will be required to comply with Regional Water Quality Control Board, City and County requirements, including the City's NPDES permit. A system of holding tanks and drywells, as well as Best Management Practices provided in the Project's WQMP and SWPPP, will assure that all water discharged within the Project, whether into the ground for percolation or into the existing golf course lakes, meets all water quality requirements. Through the implementation of these requirements of law, water released to the golf course lakes will meet or exceed water quality requirements.

Comment C-7 Environmental Setting, Impacts, and Mitigation, Hydrology and Water Quality Section, Subsection 2.10.6 (Project Impacts)

Subsection 2.10.6 states on pp. 2.10-18 and 2.10-19 of the DEIR states (sic):

> *"The Project will provide water for the lagoon in one of three ways: installation of* a *new groundwater well at the southeastern corner of the site; connection to the existing Desert Willow groundwater well located south of the* site *near Country Club Drive; or utilization of the potable water from CVWD."*

Table 2.10-1 (Total Project Water Demand) identifies that the total Project water demand would be 165.21 acre-feet per year (AFY). However, water savings from a turf reduction program at the golf course are projected to be 106.75 AFY. The net total water demand after accounting for the water savings associated with turf reduction will be 58.46 AFY. CDFW recommends that no new groundwater extractions be implemented, either through a new well or increased extractions from an existing well. The Coachella Valley has been in groundwater overdraft for many years and although groundwater levels have been improving in some areas (due to ongoing groundwater replenishment activities), the groundwater basin is still, nonetheless in overdraft. Page 42 of Appendix I to the DEIR (Water Supply Assessment and Water Supply Verification for the DSRT SURF Project) states:

> *"The effectiveness of the Groundwater Replenishment Program* has *been demonstrated by rising water levels in the Palm Springs area and by slowing water level declines in the mid-Coachella Valley portion of Whitewater River (Indio) Subbasin. According to the 2016 CVWMP [Coachella Valley Water Management Plan] Status Report, it* is *anticipated that long-term groundwater overdraft will be eliminated by 2022 in the Coachella Valley with increased groundwater levels in the Palm Springs area and the eastern Coachella valley...However, groundwater levels in the mid-Coachella Valley area will continue to decline until programs are implemented in this area to reduce groundwater pumping."*

The Project site is located in the middle section of the Coachella Valley. Although, projections indicate that groundwater overdraft may be eliminated in the groundwater subbasin as a whole by 2022, it is identified by the Water Supply Assessment that groundwater declines are still occurring in the mid-valley area.

Response C-7

The CVWD approved the Water Supply Assessment (WSA) for the proposed Project on May 14, 2019. The WSA correctly found that the CVWD has sufficient supplies to serve the proposed Project, based on its current demand, the demand expected from future growth, and its current and future supplies in normal, single dry and multiple dry years.

The commenter deleted from the second citation an important factor; the correct citation states:

> *“According to the 2016 CVWMP Status Report, it* is *anticipated that long-term groundwater overdraft will be eliminated by 2022 in the Coachella Valley with increased groundwater levels in the Palm Springs area and the*

*eastern Coachella Valley, **which exceeds the goal set by the CVWMP to eliminate overdraft by 2030**. However, groundwater levels in the mid-Coachella Valley area will continue to decline until programs are implemented in this area to reduce groundwater pumping."* (emphasis added)

As noted in the complete text, the CVWD continues to work toward eliminating overdraft. A full description of the CVWD's water supply and status as regards overdraft is provided on pages 16 through 24 of the Water Supply Assessment, Appendix I of the DEIR. As described therein, CVWD regularly updates the status of the groundwater basin in its annual Engineer's Reports. Further, the CVWD has adopted the Coachella Valley Water Management Plan (CVWMP), which details recharge and source substitution methods being implemented by CVWD and the Desert Water Agency. These methods include programs to increase recycled water supply to golf course and recharge activities in the central portion of the Basin. As stated in the EIR (and quoted above) the CVWD has implemented plans that will eliminate overdraft throughout the basin by 2022.

Comment C-8 Given that the Coachella Valley is in groundwater overdraft, and the Project site is located in an area where groundwater levels are still declining and/or have been declining in the recent past, CDFW is concerned that if the Project chooses not to use potable water (i.e., water is instead sourced via the installation of a new groundwater well at the southeastern corner of the site, or connection to the existing Desert Willow groundwater well located south of the site near Country Club Drive) reliance on groundwater for this Project would have impacts to biological resources not identified or analyzed in this DEIR. If the Lead Agency wishes to pursue the use of groundwater for this Project CDFW recommends that additional analyses be completed and presented in a revised and recirculated EIR for public review and comment. As currently prepared the DEIR lacks sufficient information on the potential impacts of additional groundwater extraction at this location.

Response C-8 Please see Response C-7. Most importantly, as described in both the DEIR (page 2.10-9) and the WSA for the Project, CVWD's domestic water supply is groundwater from the Whitewater River Groundwater Basin. Therefore, whether the Project utilizes the domestic water pipes located in Desert Willow Drive, the existing golf course well, or a new well on the Project site, the source of water will be the same – groundwater from the Whitewater River Subbasin. The Project will utilize tertiary treated water, currently available at Desert Willow Drive, for irrigation of landscaped areas. As described in the DEIR, Table 2.10-1, the Project will generate demand for 165.21 acre feet per year (AFY).

The Project's implementation of a comprehensive turf reduction program on both courses at Desert Willow will result in a reduction in water use of 106.75 AFY in the area immediately surrounding the Project. As a result, the Project's net water demand will be 58.46 AFY. Given that the water demand for the hotels alone is 60.99 AFY, the net water demand will be less than that required for the two hotels. This represents significant water demand reduction by design, and results in less than significant impacts on water demand from the proposed Project.

The commenter provides no evidence that reliance on groundwater would impact biological resources not identified or analyzed in the EIR. The site does not contain any natural spring or riparian habitat. There are no wetlands or other potential ground-water-based environments on or adjacent to the Project site (DEIR Appendix C, page 26). The lakes in the Desert Willow Golf Course are all engineered, man-made bodies of water that store groundwater extracted for irrigation and storm water generated on and around the Desert Willow project. The DEIR correctly analyzed all the biological resources on the site, and determined that with the implementation of mitigation measures related to migratory birds and burrowing owl, the Project's impacts on biological resources would be less than significant.

Comment C-9 **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code , § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB) . The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/ biogeodata/cnddb/ pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@ wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/ cnddb/plants_and_ animals.asp.

Response C-9 Comment noted. As stated in the DEIR, page 2.4-20, no sensitive plant or wildlife species were identified on the Project site. Burrowing owl habitat is present on the Project site, but no sign of occupancy or individual was identified during the biological resources survey. The DEIR requires pre-construction surveys for the species, along with MBTA surveys. Should any sensitive species be identified in those surveys, the Project biologist will comply with the requirements of law.

Comment C-10 **FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs , tit. 14, § 753.5; Fish & G. Code , § 711.4; Pub. Resources Code, § 21089.)

Response C-10 Comment noted. The City will pay the appropriate filing fees when the Notice of Determination is filed with the County of Riverside.

Comment C-11 **CONCLUSION**

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources and we request that the City address the Department's comments and concerns prior to adoption of the DEIR. In particular we request clarification regarding the ultimate water source to be used for this project. If you should have any questions pertaining to the comments provided in this letter, please contact Charles Land (760) 200-9418 or at Charles.Land@wildlife.ca.gov.

Response C-11 The City thanks the Department for its participation in the CEQA process. The Department's questions regarding water supply have been addressed in the comments above. The City will transmit the Final EIR/Response to Comments to the Department and all other commenters as required by law prior to the City Council's consideration of the EIR.

D. South Coast Air Quality Management District

Comment D-1 South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

Response D-1 The City thanks South Coast AQMD for participating in the review of the EIR, and for providing comments and guidance relevant to air quality standards and regulations.

Comment D-2 South Coast AQMD Staff's Summary of Project Description

The Lead Agency is proposing the construction of a six-acre surf lagoon, 45,000 square feet of retail uses, 11,250 square feet of restaurant uses, 350 hotel rooms, and 88 residential units on 17.69 acres (Proposed Project). The Proposed Project is located on the northeast comer of Country Club Drive and Portola Avenue. Construction of the Proposed Project is expected to occur in two phases over two years, reaching full buildout in 2021. Phase One of the construction includes the surf lagoon, retail uses, and restaurant facilities. Phase Two of the construction includes the hotel rooms and residential units.

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction activities would result in 99.73 pounds per day (lbs/day) of NOx emissions, which is slightly below South Coast AQMD's air quality CEQA significance threshold of 100 lbs/day for NOx, after the implementation of Mitigation Measure (MM) AQ-9. MM AQ-9 requires the preparation of a dust control management plan. Additionally, the Lead Agency found that the Proposed Project's operational air quality impacts would be significant and unavoidable for NOx at 116 lbs/day during regular operation and 152 lbs/day during a special event, after the implementation of MM AQ-1 through MM AQ-8. MM AQ-1 through MM AQ-8 require five percent of vehicle parking spaces to include electric vehicle (EV) charging stations, a five-minute idling restriction, energy efficient appliances, street sweepers, and landscaping, light colored roofing, and an employee commute reduction program.

Response D-2 Comment noted. South Coast AQMD has provided an accurate summary the Project Description and the Air Quality Analysis.

Comment D-3 South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis and the proposed mitigation measures. South Coast AQMD staff found that the haul routes identified in the Draft EIR, which were used to calculate emissions from haul truck trips during construction, appeared to be shorter than the distance found in aerial imagery. To further incentivize the use of EVs by patrons visiting the Proposed Project and to further reduce operational NOx emissions during regular operation and special events, South Coast AQMD staff recommends that the Lead Agency include six percent of vehicle parking spaces to include EV charging stations instead of five percent and designate eight percent of vehicle parking spaces for clean air vehicles in the Final EIR. Please see the attachment for more information.

Response D-3 South Coast AQMD staff provided an Attachment to their comment letter that includes additional information regarding the above construction haul trips and EV comments. The Attachment comment regarding haul trips is labeled Comment D-5, and is fully addressed in Response D-5. The Attachment comment regarding EVs is labeled Comment D-6, and is fully addressed in Response D-6.

Comment D-4 Conclusion

Pursuant to California Public Resources Code Section 21092.S(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

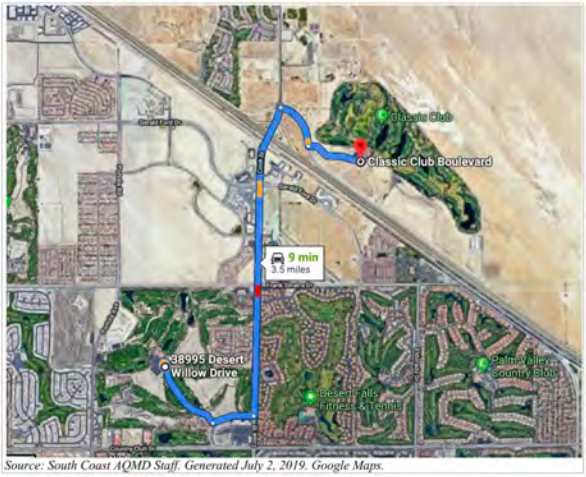
Response D-4 The City thanks the South Coast AQMD for its participation in the CEQA process. The South Coast AQMD's questions regarding air quality impacts have been addressed in the comments and responses below. The City will transmit the Final EIR/Response to Comments to the South Coast AQMD and all other commenters as required by law prior to the City Council's consideration of the EIR.

As described below, the City has taken the South Coast AQMND's recommendations under consideration, addressed questions, and included mitigation measures or explained why they have not been included in the responses below.

Comment D-5 **Air Quality Impact Analysis - Haul Truck Emissions**

1. In the Air Quality Analysis, the Lead Agency quantified haul truck emissions by calculating the vehicle miles traveled (VMT) per day by haul trucks. The Lead Agency identified the number of haul truck trips expected per day and multiplied the trips per day by a distance of 2.5 miles because the exported material would be taken to the Classic Club. South Coast AQMD staff is concerned that the Lead Agency may have under-estimated the haul trip distance. As shown in Figure 1 below, the shortest haul route distance from the Proposed Project to the Classic Club is approximately 3.5 miles. Calculating the Proposed Project's haul truck emissions based on a 2.5-mile hauling distance instead of a 3.5-mile hauling distance might have under-estimated the Proposed Project's construction emissions. Therefore, to conservatively analyze a worst-case construction impact scenario, South Coast AQMD staff recommends that the Lead Agency recalculate haul truck emissions based on a 3.5-mile trip length, or provide additional information to justify the use of a 2.5-mile trip length in the Final EIR. If the Lead

Figure 1: Proposed Haul Route



Source: South Coast AQMD Staff. Generated July 2, 2019. Google Maps.

Agency finds, after revising the Air Quality Analysis, that a new significant impact or a substantial increase in the severity of the air quality impact than that analyzed in the Draft EIR that cannot be reduced to less than significant levels with existing MM AQ-1 through MM AQ-9, the Lead Agency should commit to reevaluating the Proposed Project's Air Quality Impacts and recirculating the Air Quality Analysis section of the Draft EIR for public review and comments (CEQA Guidelines Section 15088.5).

Response D-5 The air quality modeling originally assumed a 2.5-mile haul route. Adhering to South Coast AQMD's recommendation, haul truck emissions were recalculated in CalEEMod Version 2016.3.2 using a 3.5-mile trip length to conservatively analyze a worst-case construction impact scenario. During the process of revising the CalEEMod assumptions, two additional changes were made in the model to reflect CARB and USEPA equipment emission standards and other construction practices that were not previously considered, as recommended by South Coast AQMD.

The first modification made to the model, consistent with South Coast AQMD's recommendation (see Comment D-7) was updating all construction equipment engines to Tier 4 per CARB and USEPA off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. These standards were recommended in South Coast AQMD's comment letter Attachment, item 3.a, for *Construction-Related Air Quality Mitigation Measures*. An additional mitigation measure, **MM AQ-10**, will be added to require Tier 4 engine standards (See Response D-7, below).

The second modification made to the model was equipment operational hours during the grading period where hauling occurs. Originally, the model assumed that all pieces of equipment were to operate for 8 hours per day, essentially operating non-stop during a standard work day. To account for worker breaks, refueling, loading of the haul trucks, and miscellaneous maintenance, the hours of operation were changed from 8 hours per day to 7 hours per day.

The following table provides the comparison of previous Project construction emissions and the recalculated emissions with modifications, as discussed above. See Appendix B for the revised CalEEMod outputs.

Construction Emissions Comparison: Proposed Project (lbs./day)

	CO	NO_x	ROG	SO_x	PM_{10}	$PM_{2.5}$
ORIGINAL – 1/30/2019						
Max. Daily Emissions	65.67	99.43	65.90	0.14	9.58	6.11
SCAQMD Threshold	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**
REVISED – 7/9/2019						
Max. Daily Emissions	64.85	92.32	65.90	0.14	9.58	6.11
SCAQMD Threshold	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod Version 2016.3.2.						

As shown in the table above, construction-related emissions would remain below South Coast AQMD thresholds. Given that emissions will remain less than significant, that the change in haul trip length is not significant, and that the addition of the Tier 4 engine requirement represents a standard of law, no substantial change has been made to the EIR, and recirculation is not necessary or required.

Please note that this change affects a number of pages in EIR where emissions are discussed. The locations of changes, and the proposed change are provided in Section 3.

Comment D-6

Recommended Revisions to Existing Mitigation Measure AQ-1

2. The Lead Agency has committed to installing electric vehicle (EV) charging stations in five percent of all vehicle parking spaces at the Proposed Project. To facilitate the implementation of the 2016 California Green Building Standards Code, Part 11 for nonresidential projects with 201 vehicle parking spaces or more to include EV charging stations in at least six percent of all vehicle parking spaces, South Coast AQMD staff recommends that the Lead Agency incorporate the following changes to MM AQ-1 in the Final EIR. Additionally, South Coast AQMD staff recommends that the Lead Agency include designated parking for clean air vehicles in at least eight percent of all vehicle parking spaces for nonresidential projects with 201 vehicle parking spaces or more.

MM AQ-1: At least ~~5~~6% of all vehicle parking spaces shall include EV charging stations and 8% of all vehicle parking spaces shall include designated parking for clean air vehicles.

Response D-6

Comment noted and the suggested update to **MM AQ-1,** above, will be made in the Final EIR.

Comment D-7 **Additional Recommended Mitigation Measures**

3. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. South Coast AQMD staff recommends that the Lead Agency review the following recommended mitigation measures for incorporation in the Final EIR to further reduce construction and operational emissions.

Construction-Related Air Quality Mitigation Measures

a. Require the use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions. A list of CARB verified DPFs are available on the CARB website.

To ensure that Tier 4 construction equipment or better will be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 3 emissions standards, reduction in the number and/or horsepower rating of

construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate. Require that contractor(s) maintain records of all trucks visiting the Proposed Project and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.

c. Maintain vehicle and equipment maintenance records for the construction portion of the Proposed Project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. All maintenance records shall remain on-site for a period of at least two years from completion of construction.

d. Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: http://www.agmd.gov/home/programs/business/business-detail?title=off-road-diesel-engmes.

Response D-7 As described in Response D-6, the EIR will be modified to include recommendation “a” to require the use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB)

and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. The mitigation measure will read as follows:

MM AQ-10 Off-Road Emission Standards
It shall be required that all off-road diesel-powered construction equipment meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction.

Because all criteria pollutant emissions are below South Coast thresholds for construction, and therefore do not create significant adverse impacts, the addition of items "b" through "d" as mitigation measures are not necessary.

Comment D-8 *Operation-Related Air Quality Mitigation Measures*

a. Provide incentives for vendors and material delivery trucks that would be visiting the commercial/retail uses of the Proposed Project to encourage the use of ZE or NZE trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

b. Establish a shuttle bus system to accommodate special events, aimed at reducing vehicle miles traveled and idling times associated with traffic congestion of visitors of the Proposed Project.

c. Maximize the use of solar energy including solar panels. Install the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations.

d. Maximize the planting of trees in landscaping areas and parking lots.

Response D-8 As discussed in the DEIR on page 2.13-16, operational-emissions of NOx related to customer/passenger vehicle trips could have potentially significant adverse impacts. The suggestions (a-d) made by the commenter do not directly address the impact associated with NOx related to passenger vehicle trips. Although the incentive program for vendors and material delivery trucks

may result in a slight reduction to operational emissions, this measure cannot be enforced with 100% guarantee that all tenants will participate in the incentive program. As a result, its addition would not represent an effective mitigation measure, and would not reduce NOx emissions.

Additionally, suggestions "b" through "d" have already been incorporated into the Project design and operations, and are not necessary as mitigation measures. Please see DEIR page 1-6 as it relates to shuttle buses for special events, page 2.2-33 as it relates to the incorporation of solar panels in the Project design, and page 1-3 as it relates to landscaping requirements.

Comment D-9

Responsible Agency and South Coast AQMD Permits

4. It is important to note that generally, operation of portable engines and portable equipment units of 50 horsepower (hp) or greater requires a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB). In the event that using portable cement manufacturing, aggregate crushing, and screening equipment of 50 hp or greater is expected at the Proposed Project, the Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if a South Coast AQMD permit will be required and if compliance with any South Coast AQMD rules and/or regulations are required. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. If the Proposed Project is required to adhere to any South Coast AQMD rules and regulations, South Coast AQMD rules and regulations should be discussed in the Air Quality section of the Final EIR to demonstrate compliance. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp.

Response D-9

Comment is noted. The City shall consult with South Coast AQMD's Engineering and Permitting staff should a South Coast AQMD permit be required and if compliance with any South Coast AQMD rules and/or regulations are required.

E. Law Offices of John Belcher

Comment E-1 This law firm represents Save Our Mojave, a 501(c)(3) non-profit organization working to raise public awareness about some of the most pressing issues facing California's deserts, including unchecked damage to the environment and wildlife.

Save Our Mojave has reviewed the Environmental Impact Report ("EIR") for the proposed DSRT SURF Project (the "Project"). The project proposes the development of a 6-acre surf lagoon and surf center facilities (restaurant, bar, retail, and similar facilities) and up to 350 hotel rooms and 88 residential villas on 17.69 acres in the City of Palm Desert, Riverside County. As described in the DSRT Surf Specific Plan:

> The Project will be implemented in two phases. The Surf Lagoon Planning Area will include development of a 5.5-acre surf lagoon and surf center facilities to include restaurant, bar, retail, and similar facilities together totaling 11.85 acres. The Hotels and Villas Planning Area will include the development of up to 350 hotel rooms and up to 88 resort residential villas on approximately 5.84 acres. Parking facilities throughout the Project will include surface parking, underground parking, and improvement of an existing off-site parking lot southeast of the Project site for overflow parking during special events. Primary Project access will be provided via two access drives on Desert Willow Drive, and emergency access will be provided at a third access point at the southwestern portion of the Project, into the adjacent developed Westin Desert Willow project. In addition to daily operations, the surf lagoon and surf center will also be capable of accommodating special events that will attract additional surfers and ticketed spectators. The number of special events is not currently known. However, for purposes of this document, it has been assumed that up to one event per month could occur, for a total of 12 special events per year.

Response E-1 Comment noted. The commenter cites page ES-2 of the DEIR.

Comment E-2 The EIR describes the proposed Project and assesses the potential adverse impacts on the surrounding physical environment, but concludes that the effects could be mitigated to "less- than-significant" levels, or that they are "significant, but unavoidable." After investigation and after review of publicly available documents, Save Our Mojave believes that the Project does not adequately mitigate the impact of the Project on the environment and local wildlife, and neither does it adequately explore the cumulative impacts of this Project relative to others in the area.

"CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure." CEQA Guidelines § 15003(1). Absent complete environmental impact analysis of the effect on the local environment and wildlife, the EIR is not a "good faith effort at full disclosure."

Response E-2 The commenter's opinion is noted. However, as described in the Responses which follow, the DEIR is adequate, complete and provides full disclosure of the Project's direct, indirect and cumulative impacts.

Comment E-3 Above all, we are extremely concerned about the level of water usage required for the continuos (sic) operation of this Project. The EIR admits repeatedly that the Coachella Valley relies on groundwater for its primary supply source, and that "the amount of water in the aquifer has decreased over the years due to pumping to serve urban, rural and agricultural development in the Coachella Valley, which has withdrawn water from the aquifer at a rate faster than its natural rate of recharge." The solution has been to import the majority of the water supply, primarily from the Colorado River.

Response E-3 As described in the EIR and Water Supply Assessment for the project (Appendix I), the CVWD balances its withdrawals of groundwater with natural surface water recharge, the recycling of water at two of its treatment plants, and recharge from at several facilities located in the western and eastern Coachella Valley (DEIR page 2.10-9; Appendix I pages 16 to 24). As a result of these activities, the Basin is no longer in overdraft. The CVWD has long-standing State Water Project (SWP) contracts which it uses for recharge efforts. The SWP allocations are established each year. In years of high supply, the CVWD recharges greater amounts of water; whereas in low supply years recharge is limited. As described in Response C-7, the CVWMP includes comprehensive management of the water resource, consistent with State law.

Comment E-4 Coachella Valley's water conservation plans rely heavily on source substitution with the Colorado River, but the Colorado River is also experiencing historically low levels and drought conditions. Countless other communities also rely on the Colorado River as a water source, so this practice is not sustainable in the long term. In fact, the EIR only analyzes and accounts for the water supply through 2040, which is relatively soon. With exponential population growth expected, and the continuing effects of climate change, this analysis needs to account for a much longer period of time. The updated *Coachella Valley Water Management Plan* even admits:

There are a number of uncertainties inherent in the demand projections, including:

- Growth forecasts or rates of growth may be too high or too low
- Impacts of economic booms and busts
- Reductions in fish farm operations
- Rates of development on Tribal lands
- Rate of agricultural/vacant land conversion to urban use
- Future water demand factors for various land uses
- Growth outside the Whitewater River subbasin
- Number of future golf courses developed in the East Valley
- Acceptance and effects of water conservation measures

It quickly goes on to say that "climate change could affect the long term supplies of both the SWP and Colorado River and water demands within the Valley" MWH, *Coachella Valley Water Management Plan Update §* ES-16 (2012).

Response E-4

The commenter cites the Executive Summary of the CVWMP, but fails to recognize that the document went on to analyze goals for water conservation, techniques for conservation and management of the resource, and extensive analysis of both the implementation of the CVWMP to date, and future efforts. In addition, the CVWD has issued regular Status Reports on the CVWMP, the latest being in 2016. In that report, as described on pages 36-37 of the WSA, the Basin is no longer in overdraft due to the management of the resource implemented in the CVWMP. Further, the CVWD does not assume or rely on its annual assigned allocation. Instead, as described on pages 58 and 59 of the WSA, the CVWD's planning assumptions are that it will receive 50% of its allocation on an annual basis. This represents a conservative estimate of the potential for source substitution. The CVWD also has implemented conservation measures which have resulted in reductions in demand, and continues to plan for further conservation. Finally, the CVWMP includes expanded use of recycled water, to include not only golf course uses, but landscaping areas as well.

As it relates to the WSA's analysis to 2040, the timeframe was established by SB 610 and SB 221, when they were passed into law. California Water Code Sections 10910 and 10912 were amended at that time to require water purveyors to analyze water supply based on land use on a 20 year horizon. Analysis beyond that timeframe would be speculative and not based on fact. The WSA and DEIR, therefore, correctly analyze the CVWD's water demand and supply.

As it relates to population growth, all of CVWD's planning documents, including the CVWMP and its Urban Water Management Plan (UWMP) are based on population growth data developed by the Riverside County Center for Demographic Research, and were adopted by the Southern California Association of Governments. The continued analysis of population projections in the region resulted in a lowering of anticipated population growth in the UWMP in 2015 (WSA page 53).

Finally, as it relates to climate change, the WSA thoroughly describes that CVWD has and continues to consider climate change, including a water supply buffer in its assumptions (WSA pages 42-43, and Appendix A).

Comment E-5 The Project (even with extensive mitigation) is projected to demand over 18 million gallons of water per year, around 1.25 million of that being loss due to backwash and evaporation from the pools, spas, and the surf lagoon. If not for artificial recharge from other declining sources, the area would have nowhere near enough water supply for the demand and it is therefore unsustainable to continue to grow the demand by such great margins. Projects that allow for such a high degree of wasted resources, i.e. the amount of water lost due to evaporation, should not be permitted to put pressure on already declining aquifers. This is especially true when the climate crisis is creating an uncertain future where sustainability and demand on aquifers are getting harder and harder to predict.

Response E-5 As described in the DEIR, pages 2.10-18 through 2.10-25, the proposed Project will generate a total water demand of 165.21 AFY. The Project is required, however, to implement a turf reduction program on both Desert Willow golf courses. The area to be replaced currently generates a demand for 143.08 AFY. With implementation of the turf reduction requirement, the same area will generate a demand of 36.34 AFY (EIR Table 2.10-5). This water demand is currently accommodated by recycled water and groundwater pumped from the existing wells on the property. By replacing the turf with drought tolerant landscaping, the Project will reduce water demand by 106.75 AFY on the golf course. The Project's net water demand will be 58.46 AFY. The CVWD determined that it has sufficient supplies to accommodate the project when it adopted the WSA on May 14, 2019.

The Project will implement water conservation measures prescribed by the Uniform Building Code in effect at the time that construction is undertaken. These conservation measures include both interior fixtures, and outdoor irrigation of low-water demand landscaping. The Project's landscape plans must meet or exceed the City's landscaping ordinance, which sets strict limits

on irrigation. Further, the Project's irrigation will use recycled water currently available at the golf course. These measures, considered in the calculation of water demand provided in Table 2.10-1 of the DEIR, assure that the Project will not waste resources.

As it relates to climate change, please see Response E-4.

Comment E-6 We are also deeply concerned about the impact of the Project on the area's burrowing owl population. Long-term studies need to be conducted on burrowing owls in the area. Previous studies are minimal and preconstruction surveys, while protecting specific owls in the short-term, would not accurately represent any long-term effects on local populations.

Western burrowing owls are at risk of going extinct in areas of California, and habitat degradation and fragmentation are the most pressing issues facing the species. This project has a potentially significant impact. As burrowing owls are ground nesting, there are almost no possible methods of mitigation, and any amount of disturbance in their direct habitat would eliminate them. Attempts have been made to relocate burrowing owls in other areas of California, but the success rates has (sic) been inconsistent. Attempts have also been made to create imitation burrows to attract owls to a new area, but those have also been mostly unsuccessful.

San Diego Zoo conservationists affirm that current mitigation strategies have no proven record of success and further research is required into the best methods of mitigation for this species.

Response E-6 The commenter is incorrect. The burrowing owl has been extensively studied in the Coachella Valley, particularly in the Coachella Valley Multiple Species Habitat Conservation Plan (MSHCP). As described on pages 2.4-20 through 2.4-21 of the DEIR, the burrowing owl is a covered species under the MSHCP, but its take is not authorized by the Plan. The DEIR further describes that the biologist identified suitable mammal burrows on the Project site, but did not find either sign or presence during the site specific survey. The species, however, is mobile, and could occupy the site prior to construction. As required by California Fish and Game Code and the Migratory Bird Treaty Act, to avoid take of the species and assure that the Project has no impact on it, Mitigation Measures BIO-2 and BIO-3 are provided in the EIR. These measures include performance standards, including compliance with CDFW protocol, to assure that the species is not impacted. Should pre-construction surveys identify the presence of the species on the site, CDFW consultation is required. CDFW, as the State's expert agency on the protection of the species, would

recommend and work with the biologist to determine what course of action is most appropriate. The EIR fully discloses that the species does not occur, but provides for effective mitigation should it be located prior to the initiation of construction. The EIR and mitigation measures correctly conclude that impacts to the species will be less than significant with the implementation of mitigation measures.

Comment E-7 Protection of the burrowing owls themselves is not the only relevant factor, as the owls rely heavily on ground squirrels as a primary source of prey. The Project could also potentially impact local ground squirrel populations, but this discussion is absent from the EIR. Further surveys need to be done in order to better understand the permanent direct and indirect impacts on the area ground squirrel population.

Response E-7 As stated in Response C-6 and in the EIR, burrowing owl were not identified on the site, nor was their sign found at or near the burrows the biologist identified. Given that the species does not occur, the commenter's assumption that it would have a significant impact on ground squirrel populations is unfounded. Also as stated in the EIR (page 2.4-11) no ground squirrels were identified during the site survey. Table 2.4-3 identifies one sensitive ground squirrel species, the Coachella Valley (Palm Springs) round-tailed ground squirrel, as absent from the site, based on degraded habitat and distance from the nearest reported sighting of the species. Therefore, there is no likelihood of impacts to ground squirrels, or as a result, indirect impacts on burrowing owl, on the Project site, and no further analysis is required.

Comment E-8 The Project will also result in significantly compromised air quality in the area throughout the construction process, and potentially once the development is completed. Removal of stabilized soils and biological soil crust creates a destructive cycle of airborne particulates and erosion. As more stabilized soils are removed, blowing particulates from recently eroded areas act as abrasive catalysts that erode the remaining crusts thus resulting in more airborne particulates.

Response E-8 The EIR correctly identifies that the Project area, and the Coachella Valley, are in non-attainment for PM10, and unclassified for PM2.5. The EIR also describes that the Project site is subject to the 2003 PM10 Coachella Valley State Implementation Plan (CVSIP), which was adopted specifically to address attainment of PM10 standards (EIR page 2.3-2). The EIR also includes Table 2.3-2, which shows the number of days when the federal and State standards for PM10 were exceeded. As shown in that table, the more stringent State standard has not been exceeded since 2013. The CVSIP imposes strict

standards for construction activities as they relate to PM10, and requires all projects to prepare PM10 management plans that must be approved by the local jurisdiction prior to initiation of activities on a project site. The proposed Project will be subject to these requirements. As shown in Table 2.3-6, with the implementation of the standard requirements of a PM10 management plan, the proposed Project's construction activities will result in 9.58 pounds of PM10, and 6.11 pounds of PM2.5, far below the SCAQMD threshold of 150 and 55 pounds, respectively.

Comment E-9 As stated in the current EIR, development-related NOx emissions would "violate State or Federal air quality standards for NOx emissions, which subsequently will substantially contribute to the existing ozone violation in the Salton Sea Air Basin." The EIR had already discussed the compromised air quality in the area due to environmental and weather factors, admitting that particulates are often held in the area, creating ongoing air quality issues. The EIR in fact, goes on to say that even with full implementation of the mitigation measures, the "impacts associated with operations of the proposed Project at build out will remain significant and unavoidable" and "operational impacts will continue to exceed NOx emissions under the current analysis methods." A development with this effect on emissions is unacceptable amidst the current state of our climate crisis.

Response E-9 The commenter's opinion is noted. The EIR correctly identifies that NOx emissions will exceed SCAQMD thresholds during operations. The EIR also fully discloses that the exceedance is the result of vehicle trips. The EIR then imposes mitigation measures, to the greatest extent practical, to reduce these emissions, including idling time limitations for delivery vehicles, employee commute reduction programs for large employers, and the use of electric mowers. As stated in the EIR, however, even with the implementation of these mitigation measures, NOx emissions will exceed SCAQMD thresholds of significance, and impacts will be significant and unavoidable (EIR page 2.3-21).

As described in the CEQA Guidelines, Section 15002, the purpose of CEQA is to "inform governmental officials and the public about the potential, significant environmental effects of proposed activities." The EIR has provided that analysis, and demonstrated to the public and the City's officials that NOx emissions cannot be mitigated to a less than significant level. The EIR also states that in order to approve the Project, the City will be required to adopt Findings and a Statement of Overriding Considerations (EIR page 2.3-21). The EIR correctly identifies the process, as provided in CEQA Guidelines 15093, which the City is required to consider. When the Project is considered by the City Council, it will have the opportunity to consider whether the adoption of

a Statement of Overriding Considerations is appropriate, based on applicable "economic, legal, social, technological or other benefits" of the proposed Project.

Comment E-10 The EIR needs to go farther in addressing the spike in greenhouse gas emissions during the potentially multiple year construction period. Due to the use of heavy construction equipment, unsafe levels of air pollutants would have an impact on the surrounding community and wildlife during that time. The presence of toxic air contaminants during construction is discussed in relation the sensitive human receptors, but ignores construction pollutant impact on wildlife and the ecosystem.

Response E-10 The EIR, Section 2.8.6, identifies that the project will generate a total of 2,491.23 metric tons of CO2e during Project construction (Table 2.8-1). The EIR further breaks down these emissions on an annual basis, assuming a three year construction period. As provided by SCAQMD in its standards and requirements, the construction emissions are amortized over a 30 year period to determine total annual GHG emissions associated with the Project. This analysis, provided in Table 2.8-3, shows that the Project will result in significant and unavoidable impacts associated with GHG emissions. As described in Response E-9, the EIR correctly discloses the level of impact, and that in order to approve the Project, the City will be required to determine whether the benefits of the Project outweigh the impacts associated with GHGs.

As regards toxic air contaminants, the proposed Project does not occur within proximity to a high volume roadway or railroad, and will not generate diesel truck trips beyond the vehicle mix established for resort projects in the Valley. The EIR does analyze both the health impacts associated with air pollutants (EIR pages 2.3-17-2.3-18), and the impacts to sensitive receptors proximate to the Project site during construction (EIR page 2.3-19). As correctly stated, in the case of the former, on-site and off-site exposure to NOx generated by the Project are expected to result in less than significant impacts associated with health risks. The analysis also discusses the cumulative impacts associated with the regional nature of air pollutants, and the lack of factual data relating to health risks. In the case of localized emissions, the EIR includes a discussion of proximate sensitive receptors, and quantifies those impacts in Table 2.3-8. As shown in that Table, the impacts associated with criteria pollutants for which the region is in non-attainment will be well below the thresholds of significance established by the SCAQMD.

The commenter offers no substantial evidence that construction pollutants will impact wildlife or the ecosystem in a manner different or greater than that analyzed for human beings. As stated in the EIR analysis of biological resources (Section 2.4), the site is comprised of degraded habitat that has been impacted by human activities associated with the golf course which surrounds the site. No sensitive species were identified on the Project site, nor are sensitive species expected to occur on the site (see Tables 2.4-1 through 2.4-3). Common species occur on and surrounding the Project site, but there is no evidence that air emissions from localized construction activities would be greater than those to human beings, which would be less than significant as established by the SCAQMD.

Comment E-11 Noise pollution, like air pollution, has significant health implications. Construction and traffic noise are some of the largest producers of noise pollution. Prolonged exposure to noise pollution can lead to hypertension and heart disease, hearing loss and consequential sleep disturbances. The surf lagoon is projected to stay open until midnight or 2 A.M., and the Project is projected to host around 12 special events per year. All of these elements will contribute heavily to noise pollution in the area. Noise pollution does not only adversely effect (sic) human lives. Wildlife, especially birds, are heavily impacted by increased noise pollution. Communication, mating behavior, hunting and survival instincts of animals are altered by excessive noise.

Response E-11 The commenter provides no substantial evidence that specific noise levels will impact wildlife at the Project site. Section 2.12-6 analyzed noise impacts associated with the proposed Project. In that analysis, construction noise is shown to reach up 68.4 dBA Leq at 90 feet. This noise level is typical of urban environments, and well below the National Institute of Occupational Safety and Health's 85 dBA noise threshold of significance (EIR page 2.12-20).

The EIR also quantified operational noise levels, including noise levels during special events. As shown in Table 2.12-15, noise levels during special events will not exceed the City's daytime or nighttime thresholds for either residential or commercial land uses proximate to the Project. The EIR also depicted the noise contours associated with the Project in Exhibit 2.12-3. As shown in that Exhibit, noise levels of 60 dBA or less are expected to occur at the property line. These noise levels are consistent with or less than the noise levels acceptable by City standards, and consistent with the urban environment in which the Project is proposed.

As described in Response E-10, there are no sensitive wildlife species on the Project site. Common species will be subject to the 68.4 dBA construction noise levels, but given their life currently in an urban environment, they are experiencing these noise levels. Because the proposed Project will not exceed the City's standards for urban community noise levels, the proposed Project will not substantially change the noise environment for either the people or the wildlife that occur in the Project area.

Comment E-12 As written, the EIR also glosses over the aggregate environmental impacts of the Project and misleads the reader through words such as "may" and "potentially." This Project cannot be viewed independently from other planned developments in the region. The EIR needs to address the cumulative effects of the Project in relation to other nearby projects and planned developments.

> The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Guidelines § 15355(b). Water demand, greenhouse gas emissions, noise and air pollution, and habitat fragmentation are aggregate and have cumulative effects. It would be a cataclysmic oversight for the City to allow the Project to move forward without fully analyzing this Project's impact in relation to the overall impact of other projects in the region that are currently in development or in the planning stages.

Response E-12 The EIR analyzes cumulative impacts for each and every environmental impact area (see EIR Section 2 discussions, subsection .9 of each). In each impact area, the scope of the cumulative analysis is defined, based on the impact area's influence. In most cases, the scope of the cumulative impact analysis relates to General Plan build out of the City, which represents the worst-case potential for future and existing projects, and provides a more conservative analysis than studying only projects that are "in development or in the planning stages." In impact areas such as air quality, biological and cultural resources, water resources and greenhouse gas emissions, which are regional in nature, cumulative impacts are analyzed on that basis. As a result of that analysis, the EIR correctly discloses that air quality and greenhouse gas emission impacts will be significant and unavoidable.

Comment E-13 For all of the reasons stated above, we oppose the project as currently proposed. The Project's EIR must be rewritten to address all the environmental impacts. The current EIR misleads the reader as to the true impact of the Project. Only a rewritten and recirculated cumulative impacts analysis will allow the public to understand the true impact of the Project.

Response E-13 As described in Responses E-2 through E-12, the EIR thoroughly analyzes the Project's direct, indirect and cumulative impacts. The EIR does not omit data or analysis, nor does it inaccurately or incorrectly represent Project impacts. The commenter has provided no substantial evidence to the contrary. There is therefore no need to rewrite or recirculate the EIR.

F. Liridona Leti

Comment F-1 You have to reconsider the wave pool that is happening at the golf course. This is extremely anti environmentally friendly and it will not help the DESERT whatsoever. Please notice that I emphasized DESERT, we live in the desert where what you are allowing should not happen. CA has already had two major earthquakes in the last week and if you think depleting the natural resources will help, think again. All that you are allowing is more earthquakes and potholes to occur.

Do not let this go through, stop it before it gets worse.

Response F-1 The commenter's opinion is noted. The commenter does not, however, provide any substantial evidence that the proposed Project will result in either a greater number of earthquakes or potholes. The proposed surf lagoon will be constructed to meet all seismic standards of the Uniform Building Code in force at the time that building permits are secured. These standards include the reinforcement of concrete to prevent significant impacts associated with earthquakes. These impacts are analyzed in Section 2.7, and include specific discussion of a number of seismic hazards and soils hazards, including groundshaking, subsidence, lateral spreading, ground failure (including liquefaction), soil erosion, unstable soils, and expansive soils. The EIR also analyzed the potential hazards associated with seismically induced tsunami or seiche in Section 2.10-6. This analysis, supported by a comprehensive analysis by a registered geologist, resulted in a determination that impacts associated with geological hazards will be mitigated to a less than significant level with the implementation of Mitigation Measures GEO-1 through GEO-19. Impacts associated with earthquakes are correctly determined in the EIR to be less than significant with the implementation of these mitigation measures. No further analysis is required.

3.0 CHANGES TO THE EIR

The following provides changes to the Draft EIR being made as a result of the Response to Comments (Section 2) of this document. Typographical errors and other editorial modifications are also provided below. Please note that deletions are indicated in strikethrough and additions in underlined text.

CEQA Guidelines §15088.5 requires a Lead Agency to recirculate a revised EIR only if significant new information is identified following the release of the Draft EIR. "Significant new information" can include, changes in the project or environmental setting as well as additional data or other information, for example, a new significant environmental impact or a substantial increase in the severity of an environmental impact. New information is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the proponent has declined to implement.

The City has evaluated the information contained in this Final EIR as well as all other information in the record, and has determined that no significant new information has been added to the EIR after public notice was given of the availability of the Draft EIR for public review. Therefore, CEQA does not require recirculation of the Draft EIR.

Location **Change**

Page ES-26

Section 2.8 Greenhouse Gas Emissions			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	~~No Impact~~ Potentially Significant	No mitigation is required.	~~No Impact~~ Significant and unavoidable

Page 2.3-14 "The proposed Project would result in approximately 17.69-acres of disturbance. Construction would require the export of approximately 103,000 cubic yards5 of surplus earthen material to the Classic Club, which has a designated fill site for excess soils and is located approximately 3.5 miles northeast of the subject property. Therefore, it is assumed that each haul round trip would be approximately 7 miles. This represents a worse-case hauling distance, since the City may also allow the off-loading of Project-related soil export within vacant areas of the Desert Willow project, which are much closer than the 7 miles associated with the Classic Club location."

Page 2.3.14

Table 2.3-1
Construction Emissions Summary
Proposed Project
(lbs./day)

	CO	**NO_x**	**ROG**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Max. Daily Emissions	64.85	92.32	65.90	0.14	9.58	6.11
SCAQMD Threshold*	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds Threshold	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2016.3.2. See Appendix B of this EIR for detailed tables. Value shown represents the average unmitigated emissions of summer and winter outputs.
* Source: "SCAQMD Air Quality Significance Thresholds" prepared by SCAQMD.
Note: PM_{10} and $PM_{2.5}$ emissions are shown as "mitigated" in the CalEEMod output tables; however, the mitigation used is standard dust control requirements, such as watering exposed onsite soil 3 times per day.

Page 2.3-19

Table 2.3-2
Localized Significance Thresholds
25 Meters, 5 Acres
(lbs per day)

	CO	**NO_x**	**PM_{10}**	**$PM_{2.5}$**
Construction	64.85	92.32	9.58	6.11
LST Threshold*	2,292.00	304.00	14.00	8.00
Exceed?	No	No	No	No

Source of Emission Data: CalEEMod Version 2016.3.2, see Appendix B of this DEIR.
Source of LST Threshold: LST Mass Rate Look-up Table, 25 meters, 5 acres, SCAQMD.

Page 2.3.20 AQ-1 Electric Vehicle Charging Stations

At least 6% of all vehicle parking spaces shall include EV charging stations and 8% of all vehicle parking spaces shall include designated parking for clean air vehicles.

Page 2.3-21 AQ-10 Off-Road Emission Standards

It shall be required that all off-road diesel-powered construction equipment meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction.

Page 2.4-20 "Tables 2.4.1 through 2.4.3 summarize information on all special-status species that have been reported in the Project vicinity, or that have the potential to occur onsite based on geographic distribution and presence of potentially suitable habitat. Given the level of existing disturbance onsite from parking lot development, grading, installation of irrigation systems, development of surrounding parcels, and daily disturbances of human activity on the adjacent

Desert Willow Golf Resort, there is a low potential for the proposed Project to adversely impact sensitive biological species. Furthermore, the Surf Lagoon component of the Project will operate daily from 6 AM to 12 AM, resulting in constant motion on the surf lagoon. This water activity, combined with the human activity associated with surfers, will prevent water fowl from taking up residence in the Surf Lagoon."

Page 2.8-7

Table 2.8-1
Construction GHG Emissions Summary
(Metric Tons)

	CO_2	CH_4	N_2O	Total CO_2e
2019	766.21	0.16	0.00	770.34
2020	1,404.68	0.17	0.00	1,408.87
2021	289.61	0.03	0.00	290.37
TOTAL	**2,460.5**	**0.33**	**0.00**	**2,469.58**

Source: CalEEMod Versions 2016.3.2. See Appendix B of this DEIR for detailed tables. Values shown represent the total unmitigated GHG emission projections for construction of the proposed Project. CO_2e includes the remaining GHG pollutants, such as hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

Page 2.8-9

Table 2.8-2
Operational GHG Emission Summary
(Metric Tons/Year)

	CO_2	CH_4	N_2O	CO_2e
Typical Operations	16,907.63	24.91	0.12	17,565.85
12 Special Events[1]	399.12	0.00	0.00	400.08
Amortized Construction[2]	82.01	0.01	0.00	83.02
Total Operational Emissions				18,048.95

Source: CalEEMod Version 2016.3.2. See Appendix B of this DEIR for detailed tables. Values shown represent the total unmitigated GHG emission projections for operation of the proposed Project under two scenarios.
1. Emissions derived from multiplying daily metric ton emissions in Table 2.8-2 by 12.
2. Buildout construction GHG emissions were amortized over 30 years then added to buildout operational GHG emissions. Emission numbers on "TOTAL" line in Table 2.8-1 were divided by 30, and are provided above.

Page 3.17-1 "Table 3.17-1 shows the level of impact associated with each alternative and the proposed Project. As can be seen in that table, the level of significance associated with the alternatives is consistent with the proposed Project's impacts, with the exception of Air Quality and Greenhouse Gas Emissions. Under the proposed Project, vehicular emissions of NOx and CO_2E would be significant and unavoidable, due to the higher number of trips generated by the hotels, villas and surf center. Under all alternatives, air quality impacts would not exceed SCAQMD

thresholds, and impacts would be less than significant. Alternatives B and C would result in less than significant greenhouse gas emissions; however, Alternative A, similar to the proposed Project, would also result in significant and unavoidable impacts."

Table 3.17-1
Environmentally Superior
Development Alternative Comparison

	Level of Significance*			
Environmental Issue	**Proposed Project**	**Alternative A**	**Alternative B**	**Alternative C**
Aesthetics	LSM	LS	LS	LS
Air Quality	SU	LS	LS	LS
Biological Resources	LSM	LSM	LSM	LSM
Cultural & Tribal Resources	LSM	LSM	LSM	LSM
Energy	LS	LS	LS	LS
Geology and Soils	LSM	LSM	LSM	LSM
Greenhouse Gas Emissions	SU	SU	LS	LS
Hazards and Hazardous Materials	LSM	LSM	LSM	LSM
Hydrology and Water Quality	LSM	LSM	LSM	LSM
Land Use and Planning	LS	LS	LS	LS
Noise	LS	LS	LS	LS
Population and Housing	LS	LS	LS	LS
Public Services	LS	LS	LS	LS
Transportation and Traffic	LSM	LSM	LSM	LSM
Utilities and Service Systems	LS	LS	LS	LS
SU= Significant and Unavoidable LSM= Less than Significant with Mitigation LS= Less than Significant				

Page 4-1 "**Introduction**

Unavoidable significant impacts are those that cannot be reduced to acceptable or insignificant levels by the implementation mitigation measures. Impacts associated with development of the DSRT SURF Specific Plan are addressed in detail in Section 2 of this EIR. Comprehensive mitigation measures, as well as monitoring and reporting programs, have been developed to address potential impacts. In most cases, the mitigation measures set forth in this Draft EIR will demonstrably and effectively reduce all potentially significant impacts to levels of insignificance. However, air quality impacts associated with NO_x emissions during the life of the project and greenhouse gas emissions, could not be mitigated to less than significant levels and are considered an unavoidable significant impact."

Page 4-2 "**Greenhouse Gas Emissions**

All components of construction, including equipment, fuels, materials, and management practices, would be subject to current SCAQMD rules and regulations related to greenhouse gases. Applicable SCAQMD rules include, but are not limited to, source-specific standards that reduce the greenhouse gas content in engines and limit equipment idling durations. The Project will also adhere to the required state Low Carbon Fuel Standard for construction equipment and heavy-duty vehicle efficiency standards.

Operational emissions will occur throughout the life of the Project. At buildout, five emission source categories will contribute either directly or indirectly to operational GHG emissions: energy/electricity usage, water usage, solid waste disposal, area emissions (pavement and architectural coating off-gassing), and mobile sources. The bulk of operational emissions are largely due to the number of vehicle trips generated by the Project. As shown in Table 2.8-2, one special event (33.34 MTCO2e/yr) will increase overall GHG emissions by a marginal 0.19 percent.

It was recommended by SCAQMD staff that a project's greenhouse gas emissions would be considered significant if it could not comply with at least one of the "tiered" tests based upon an October 2008 staff report and draft interim guidance document[1], as described in Section 2.8.6 (p. 2.8-9).

Construction-related GHG emissions will not exceed GHG thresholds for construction because no such thresholds have been established. However, the Project would not comply with any of the tiered tests for overall operational (annual) emissions, and will therefore have Significant and Unavoidable Impacts associated with GHG emissions.

Because the Project would result in Significant and Unavoidable impacts, it can be argued that operational impacts would conflict with GHG reduction goals because operation of the Project would either exceed or not comply with SCAQMD's interim tiered thresholds. By exceeding such thresholds, the Project is contributing to GHG emissions at a level that is not conducive to reducing state and local GHG emissions. Although implementation of Mitigation Measure GHG-1 will assure the Project complies with the Palm Desert Environmental Sustainability Plan, impacts are considered significant and unavoidable."

[1] Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, prepared by SCAQMD, October 2008.

Appendix A
Comment Letters

A

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

July 8, 2019

Eric Ceja
Palm Desert, City of
73-510 Fred Waring Drive
Palm Desert, CA 92260

Subject: DSRT SURF Specific Plan, Precise Plan, TTM 37369 and ODA (SP18-0002 and PP18-0009)
SCH#: 2019011044

Dear Eric Ceja:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 7/5/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A-1

Check the CEQA database for submitted comments for use in preparing your final environmental document: https://ceqanet.opr.ca.gov/2019011044/2 . Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly**.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

Subject: FW: DSRT Surf Specific Plan transmittal ALUC comments
Date: Friday, July 5, 2019 at 11:09:32 AM Pacific Daylight Time
From: eceja@cityofpalmdesert.org
To: Nicole Criste
Attachments: image002.jpg

Eric Ceja
Principal Planner
Ph: 760.346.0611 Direct: 760.776.6384
eceja@cityofpalmdesert.org

From: Rull, Paul [mailto:PRull@RIVCO.ORG]
Sent: Tuesday, May 21, 2019 12:49 PM
To: Ceja, Eric <eceja@cityofpalmdesert.org>
Subject: DSRT Surf Specific Plan transmittal ALUC comments

Hi Eric,

Thank you for transmitting the above project to ALUC for review. Please note that the project is located outside the airport influence area, and therefore ALUC has no official comment on the project. B-1

However, I wanted to let you know that ALUC is currently reviewing a similar "surf lagoon" project (ZAP1046TH19) in the unincorporated County area of Jacqueline Cochran Airport that is tentatively scheduled for a public hearing meeting on June 13, 2019. The staff report for this project can be viewed on the ALUC website here http://www.rcaluc.org/Agendas/Meeting-Agendas about 1-2 weeks before the meeting. In the report, ALUC staff analyzes a biological wildlife hazard study for the potential impact of the "surf lagoon" on aircraft via bird strikes. The study proposes several mitigations measures to help minimize the occurrences of aircraft bird strikes. B-2

The City may find this information useful when considering the DSRT Surf project.

If you have any questions, please feel free to contact me.

Paul Rull
ALUC Principal Planner

Riverside County Airport Land Use Commission
4080 Lemon Street, 14th Floor
Riverside, Ca 92501
(951) 955-6893
(951) 955-5177 (fax)
PRULL@RIVCO.ORG
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County of Riverside California

C

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

July 3, 2019

Eric Ceja
Principal Planner
City of Palm Desert
73-510 Fred Waring Drive
Palm Desert, CA 92260

Dear Mr. Ceja:

Subject: DSRT SURF Specific Plan, Precise Plan, Tentative Tract Map 37369 and Associated Disposition and Development Agreement (SP18-0002 and PP18-0009)
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH#: 2019011044

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of Palm Desert for the DSRT SURF Specific Plan, Precise Plan, Tentative Tract Map 37369 and Associated Disposition and Development Agreement (SP 18-0002 and PP18-0009) Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

C-1

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

C-2

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code. **C-2 Cont.**

PROJECT LOCATION

The Project site is located within the Desert Willow Golf Resort south of Frank Sinatra Drive, east of Monterey Avenue, and west of Desert Willow Drive within the City of Palm Desert in Riverside County. The project site area is 17.69 acres in area. The Assessor's Parcel Numbers (APN) are 620-420-023, 620-400-024, and 620-400-008.

PROJECT DESCRIPTION

The Project proposes the development of a surf lagoon of up to 6 acres in size with surf center facilities to include restaurant, bar, retail and similar facilities, up to 350 hotel rooms, and up to 88 resort residential villas. The Project will be implemented in two phases: The Surf Lagoon Planning Area will include the development of the surf lagoon and associated amenities on 11.85 acres. The surf lagoon will be a pie-shaped water pool. The Project would include a wave machine located in the central pier of the lagoon and a mechanical building at the southeastern portion of the site. The Hotels and Villas Planning Area will result in the construction of the hotel(s) and villas on approximately 5.84 acres. The Project may provide water for the lagoon in one of three ways: a well may be dug at the southeastern corner of the site; underground pipes may be constructed to connect from the southeastern corner of the site to the existing Desert Willow well located south of the site near Country Club Drive; or the lagoon may utilize potable water from existing Coachella Valley Water District (CVWD) water lines in Desert Willow Drive. The surf lagoon will be drained to Desert Willow Golf Course Lake, located south of the site between Willow Ridge and Desert Willow Drive. Existing turf in the Desert Willow Golf Course will be removed and replaced with desert landscaping in order to reduce the demand for water.

COMMENTS AND RECOMMENDATIONS

The CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The CDFW offers the comments and recommendations presented below to assist the City of Palm Desert (City; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the CDFW to adequately review and comment on the proposed project **C-3**

with respect to impacts on biological resources and the project's consistency with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP).

The CDFW's comments and recommendations on the DEIR include:

Project Description

The Project Description on pp. 1-2 through 1-6 of the DEIR lacks a description of the timing of operation of the wave machines. Artificial water bodies in desert climates often act as attractants to waterfowl (e.g., Canada geese). If the surf lagoon wave machines are idle for extended periods, waterfowl may establish residence at the surf lagoon, thereby creating a potential human-wildlife conflict between waterfowl and surf lagoon customers. CDFW recommends that the Project Description be revised to include a description of the frequency, timing, and duration of the wave generating equipment operation. Though not identified in the Project Description, CDFW assumes that the water in the surf lagoon will be chlorinated. This information should be clarified, given that mosquito abatement may be necessary if the water is not treated and is proposed to remain undisturbed for extended periods of time (for example, when the wave machines are idle). CDFW recommends that the Project Description clearly identify any proposed mosquito abatement activities, or describe why such activities will be unnecessary.

C-3 Cont.

C-4

Environmental Setting, Impacts, and Mitigation, Biological Resources Section, Subsection 2.4.6 (Project Impacts) and 2.4.7 (Mitigation Measures)

Subsection 2.4.6 (Impacts) on pp. 2.4-19 through 2.4-21 of the DEIR lacks a description of the possibility of waterfowl establishing residence at the surf lagoon during Project operation when wave machines are idle for extended periods of time. CDFW recommends that a Contingency Plan be developed and included as a Mitigation Measure in Subsection 2.4.7 to minimize human-wildlife conflicts if waterfowl are attracted to the surf lagoon.

C-5

Environmental Setting, Impacts, and Mitigation, Hydrology and Water Quality Section, Subsection 2.10.5 (Existing Conditions)

It is stated on p. 2.10-8 of the DEIR that "If required, the surf lagoon water will be treated before being sent to the evacuation line". The evacuation line carries discharge to the existing golf course lake. CDFW was unable to locate a definition for "treated" within the DEIR. Given that the water will be discharged to a lake accessible by wildlife, CDFW recommends that a definition of "treated" be included in the DEIR to provide public review and comment for any potential impacts to fish and wildlife resources. CDFW recommends that the definition clearly identify how the water may be treated, what would trigger treatment, and the chemical constituents proposed to be used, if chemical treatment is deemed necessary.

C-6

Environmental Setting, Impacts, and Mitigation, Hydrology and Water Quality Section, Subsection 2.10.6 (Project Impacts)

C-7

Subsection 2.10.6 states on pp. 2.10-18 and 2.10-19 of the DEIR states:

> "*The Project will provide water for the lagoon in one of three ways: installation of a new groundwater well at the southeastern corner of the site; connection to the existing Desert Willow groundwater well located south of the site near Country Club Drive; or utilization of the potable water from CVWD.*"

Table 2.10-1 (Total Project Water Demand) identifies that the total Project water demand would be 165.21 acre-feet per year (AFY). However, water savings from a turf reduction program at the golf course are projected to be 106.75 AFY. The net total water demand after accounting for the water savings associated with turf reduction will be 58.46 AFY. CDFW recommends that no new groundwater extractions be implemented, either through a new well or increased extractions from an existing well. The Coachella Valley has been in groundwater overdraft for many years and although groundwater levels have been improving in some areas (due to ongoing groundwater replenishment activities), the groundwater basin is still, nonetheless in overdraft. Page 42 of Appendix I to the DEIR (Water Supply Assessment and Water Supply Verification for the DSRT SURF Project) states:

> "*The effectiveness of the Groundwater Replenishment Program has been demonstrated by rising water levels in the Palm Springs area and by slowing water level declines in the mid-Coachella Valley portion of Whitewater River (Indio) Subbasin. According to the 2016 CVWMP [Coachella Valley Water Management Plan] Status Report, it is anticipated that long-term groundwater overdraft will be eliminated by 2022 in the Coachella Valley with increased groundwater levels in the Palm Springs area and the eastern Coachella valley…However, groundwater levels in the mid-Coachella Valley area will continue to decline until programs are implemented in this area to reduce groundwater pumping.*"

The Project site is located in the middle section of the Coachella Valley. Although, projections indicate that groundwater overdraft may be eliminated in the groundwater subbasin as a whole by 2022, it is identified by the Water Supply Assessment that groundwater declines are still occurring in the mid-valley area.

C-7 Cont.

Given that the Coachella Valley is in groundwater overdraft, and the Project site is located in an area where groundwater levels are still declining and/or have been declining in the recent past, CDFW is concerned that if the Project chooses not to use potable water (i.e., water is instead sourced via the installation of a new groundwater well at the southeastern corner of the site, or connection to the existing Desert Willow groundwater well located south of the site near Country Club Drive) reliance on groundwater for this Project would have impacts to biological resources not identified or analyzed in this DEIR. If the Lead Agency wishes to pursue the use of groundwater for this Project CDFW recommends that additional analyses be completed and presented in a revised and recirculated EIR for public review and comment. As currently prepared the DEIR lacks sufficient information on the potential impacts of additional groundwater extraction at this location.

C-8

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp. **C-9**

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) **C-10**

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources and we request that the City address the Department's comments and concerns prior to adoption of the DEIR. In particular we request clarification regarding the ultimate water source to be used for this project. If you should have any questions pertaining to the comments provided in this letter, please contact Charles Land (760) 200-9418 or at Charles.Land@wildlife.ca.gov. **C-11**

Sincerely,

Heather A. Pert

for Scott Wilson
Environmental Program Manager
Inland Deserts Region

ec: Heather Pert, CDFW
Joanna Gibson, CDFW
State Clearinghouse

Ken Corey, US Fish and Wildlife Service
Jenness McBride, US Fish and Wildlife Service

D

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
ECeja@cityofpalmdesert.org
Eric Ceja, Principal Planner
City of Palm Desert, Planning Department
73-510 Fred Waring Drive
Palm Desert, CA 92260

July 3, 2019

Draft Environmental Impact Report (Draft EIR) for the Proposed DSRT Surf Specific Plan, Precise Plan, Tentative Tract Map 37369 and Associated Disposition and Development Agreement Project (SP18-0002 & PP18-0009) (SCH No. 2019011044)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR. D-1

South Coast AQMD Staff's Summary of Project Description

The Lead Agency is proposing the construction of a six-acre surf lagoon, 45,000 square feet of retail uses, 11,250 square feet of restaurant uses, 350 hotel rooms, and 88 residential units on 17.69 acres (Proposed Project). The Proposed Project is located on the northeast corner of Country Club Drive and Portola Avenue. Construction of the Proposed Project is expected to occur in two phases over two years, reaching full buildout in 2021[1]. Phase One of the construction includes the surf lagoon, retail uses, and restaurant facilities. Phase Two of the construction includes the hotel rooms and residential units.

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction activities would result in 99.73 pounds per day (lbs/day) of NOx emissions[2], which is slightly below South Coast AQMD's air quality CEQA significance threshold of 100 lbs/day for NOx, after the implementation of Mitigation Measure (MM) AQ-9[3]. MM AQ-9 requires the preparation of a dust control management plan[4]. Additionally, the Lead Agency found that the Proposed Project's operational air quality impacts would be significant and unavoidable for NOx at 116 lbs/day[5] during regular operation and 152 lbs/day[6] during a special event, after the implementation of MM AQ-1 through MM AQ-8[7]. MM AQ-1 through MM AQ-8 require five percent of vehicle parking spaces to include electric vehicle (EV) charging stations, a five-minute idling restriction, energy efficient appliances, street sweepers, and landscaping, light colored roofing, and an employee commute reduction program[8]. D-2

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis and the proposed mitigation measures. South Coast AQMD staff found that the haul routes identified in the Draft EIR, which were D-3

[1] Draft EIR. Section 2.3, *Air Quality*. Page 2.3-13.
[2] *Ibid. Appendix B, DSRT Surf-AQ GHG Report, CalEEMod Summer Run*. PDF Page 109.
[3] *Ibid.* Page 2.3-20.
[4] *Ibid.*
[5] *Ibid.* Page 2.3-16.
[6] *Ibid.*
[7] *Ibid.* Page 2.3-20.
[8] *Ibid.* Pages 2.3-20 and 2.3-21.

used to calculate emissions from haul truck trips during construction, appeared to be shorter than the distance found in aerial imagery. To further incentivize the use of EVs by patrons visiting the Proposed Project and to further reduce operational NOx emissions during regular operation and special events, South Coast AQMD staff recommends that the Lead Agency include six percent of vehicle parking spaces to include EV charging stations instead of five percent and designate eight percent of vehicle parking spaces for clean air vehicles in the Final EIR. Please see the attachment for more information.

D-3 Cont.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

D-4

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

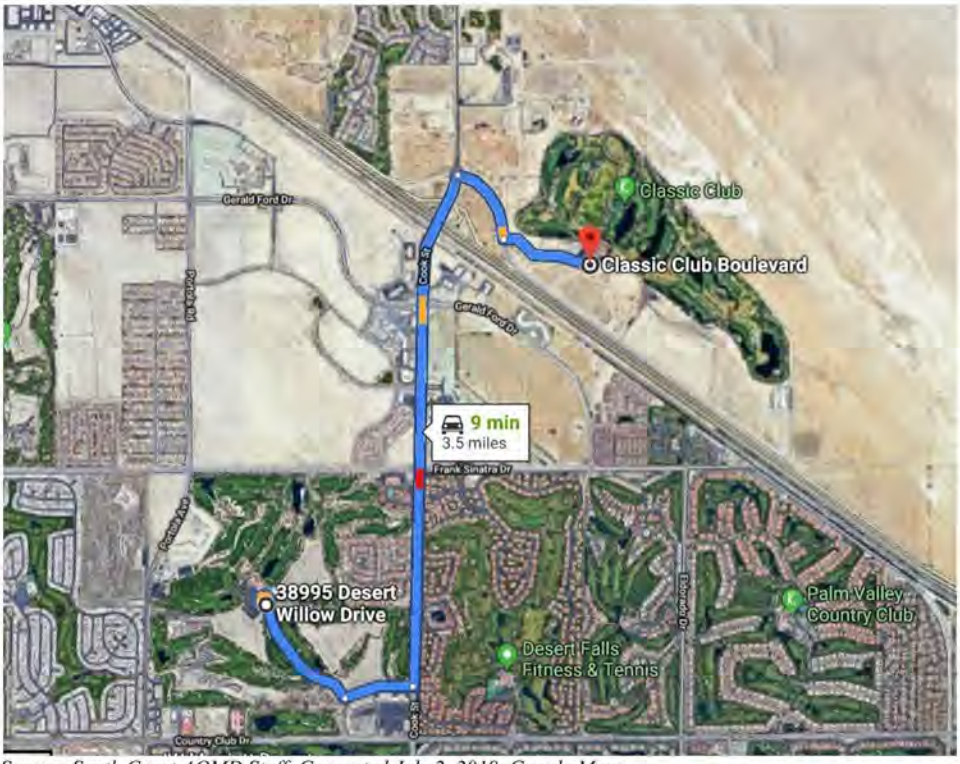
Attachment
LS:RD
RVC190521-04
Control Number

ATTACHMENT

Air Quality Impact Analysis – Haul Truck Emissions

1. In the Air Quality Analysis, the Lead Agency quantified haul truck emissions by calculating the vehicle miles traveled (VMT) per day by haul trucks. The Lead Agency identified the number of haul truck trips expected per day and multiplied the trips per day by a distance of 2.5 miles[9] because the exported material would be taken to the Classic Club[10]. South Coast AQMD staff is concerned that the Lead Agency may have under-estimated the haul trip distance. As shown in Figure 1 below, the shortest haul route distance from the Proposed Project to the Classic Club is approximately 3.5 miles. Calculating the Proposed Project's haul truck emissions based on a 2.5-mile hauling distance instead of a 3.5-mile hauling distance might have under-estimated the Proposed Project's construction emissions. Therefore, to conservatively analyze a worst-case construction impact scenario, South Coast AQMD staff recommends that the Lead Agency recalculate haul truck emissions based on a 3.5-mile trip length, or provide additional information to justify the use of a 2.5-mile trip length in the Final EIR[11]. If the Lead Agency finds, after revising the Air Quality Analysis, that a new significant impact or a substantial increase in the severity of the air quality impact than that analyzed in the Draft EIR that cannot be reduced to less than significant levels with existing MM AQ-1 through MM AQ-9, the Lead Agency should commit to reevaluating the Proposed Project's Air Quality Impacts and recirculating the Air Quality Analysis section of the Draft EIR for public review and comments (CEQA Guidelines Section 15088.5).

Figure 1: Proposed Haul Route



Source: South Coast AQMD Staff. Generated July 2, 2019. Google Maps.

D-5

[9] Draft EIR. Section 2.3, Air Quality. Page 2.3-14.
[10] *Ibid.*
[11] *Ibid.*

Recommended Revisions to Existing Mitigation Measure AQ-1

2. The Lead Agency has committed to installing electric vehicle (EV) charging stations in five percent of all vehicle parking spaces at the Proposed Project. To facilitate the implementation of the 2016 California Green Building Standards Code, Part 11 for nonresidential projects with 201 vehicle parking spaces or more to include EV charging stations in at least six percent of all vehicle parking spaces[12], South Coast AQMD staff recommends that the Lead Agency incorporate the following changes to MM AQ-1 in the Final EIR. Additionally, South Coast AQMD staff recommends that the Lead Agency include designated parking for clean air vehicles in at least eight percent of all vehicle parking spaces for nonresidential projects with 201 vehicle parking spaces or more[13]. D-6

   MM AQ-1: At least ~~5~~6% of all vehicle parking spaces shall include EV charging stations and 8% of all vehicle parking spaces shall include designated parking for clean air vehicles.

Additional Recommended Mitigation Measures

3. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. South Coast AQMD staff recommends that the Lead Agency review the following recommended mitigation measures for incorporation in the Final EIR to further reduce construction and operational emissions.

   Construction-Related Air Quality Mitigation Measures

   a. Require the use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions[14]. A list of CARB verified DPFs are available on the CARB website[15].

      To ensure that Tier 4 construction equipment or better will be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. D-7

      In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 3 emissions standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck

[12] 2016 California Green Building Standards Code, Part 11. Chapter 5, *Nonresidential Mandatory Measures.* Table 5.106.5.3.3. Page 35. Accessed at: https://codes.iccsafe.org/content/chapter/10708/.
[13] *Ibid.* Table 5.106.5.2. Page 34. Accessed at: https://codes.iccsafe.org/content/chapter/10708/.
[14] California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.
[15] *Ibid*. Page 18.

trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year[16] or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate. Require that contractor(s) maintain records of all trucks visiting the Proposed Project and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.

c. Maintain vehicle and equipment maintenance records for the construction portion of the Proposed Project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. All maintenance records shall remain on-site for a period of at least two years from completion of construction.

d. Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.

D-7 Cont.

Operation-Related Air Quality Mitigation Measures

a. Provide incentives for vendors and material delivery trucks that would be visiting the commercial/retail uses of the Proposed Project to encourage the use of ZE or NZE trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year[17]. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

b. Establish a shuttle bus system to accommodate special events, aimed at reducing vehicle miles traveled and idling times associated with traffic congestion of visitors of the Proposed Project.

c. Maximize the use of solar energy including solar panels. Install the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations.

D-8

[16] CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulations is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.html.

[17] *Ibid.*

d. Maximize the planting of trees in landscaping areas and parking lots. D-8 Cont.

Responsible Agency and South Coast AQMD Permits

4. It is important to note that generally, operation of portable engines and portable equipment units of 50 horsepower (hp) or greater requires a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)[18]. In the event that using portable cement manufacturing, aggregate crushing, and screening equipment of 50 hp or greater is expected at the Proposed Project, the Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if a South Coast AQMD permit will be required and if compliance with any South Coast AQMD rules and/or regulations are required. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. If the Proposed Project is required to adhere to any South Coast AQMD rules and regulations, South Coast AQMD rules and regulations should be discussed in the Air Quality section of the Final EIR to demonstrate compliance. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp. D-9

[18] South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: http://www.aqmd.gov/home/permits/equipment-registration/perp

E

Law Offices of John A. Belcher

ATTORNEYS AT LAW
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TELEPHONE (626) 577-5771
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July 3, 2019

Via Email

Eric Ceja
City of Palm Desert
73-510 Fred Waring Drive
Palm Desert, CA 92260
eceja@cityofpalmdesert.org

Re: Environmental Impact Report: DSRT SURF
SCH# 2019011044

Dear Mr. Ceja:

This law firm represents Save Our Mojave, a 501(c)(3) non-profit organization working to raise public awareness about some of the most pressing issues facing California's deserts, including unchecked damage to the environment and wildlife.

Save Our Mojave has reviewed the Environmental Impact Report ("EIR") for the proposed DSRT SURF Project (the "Project"). The project proposes the development of a 6-acre surf lagoon and surf center facilities (restaurant, bar, retail, and similar facilities) and up to 350 hotel rooms and 88 residential villas on 17.69 acres in the City of Palm Desert, Riverside County. As described in the DSRT Surf Specific Plan:

E-1

> The Project will be implemented in two phases. The Surf Lagoon Planning Area will include development of a 5.5-acre surf lagoon and surf center facilities to include restaurant, bar, retail, and similar facilities together totaling 11.85 acres. The Hotels and Villas Planning Area will include the development of up to 350 hotel rooms and up to 88 resort residential villas on approximately 5.84 acres. Parking facilities throughout the Project will include surface parking, underground parking, and improvement of an existing off-site parking lot southeast of the Project site for overflow parking during special events. Primary Project access will be provided via two access drives on Desert Willow Drive, and emergency access will be provided at a third access point at the southwestern portion of the

Project, into the adjacent developed Westin Desert Willow project. In addition to daily operations, the surf lagoon and surf center will also be capable of accommodating special events that will attract additional surfers and ticketed spectators. The number of special events is not currently known. However, for purposes of this document, it has been assumed that up to one event per month could occur, for a total of 12 special events per year.

E-1 Cont.

The EIR describes the proposed Project and assesses the potential adverse impacts on the surrounding physical environment, but concludes that the effects could be mitigated to "less-than-significant" levels, or that they are "significant, but unavoidable." After investigation and after review of publicly available documents, Save Our Mojave believes that the Project does not adequately mitigate the impact of the Project on the environment and local wildlife, and neither does it adequately explore the cumulative impacts of this Project relative to others in the area.

E-2

"CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure." CEQA Guidelines § 15003(I). Absent complete environmental impact analysis of the effect on the local environment and wildlife, the EIR is not a "good faith effort at full disclosure."

Above all, we are extremely concerned about the level of water usage required for the continuos operation of this Project. The EIR admits repeatedly that the Coachella Valley relies on groundwater for its primary supply source, and that "the amount of water in the aquifer has decreased over the years due to pumping to serve urban, rural and agricultural development in the Coachella Valley, which has withdrawn water from the aquifer at a rate faster than its natural rate of recharge." The solution has been to import the majority of the water supply, primarily from the Colorado River.

E-3

Coachella Valley's water conservation plans rely heavily on source substitution with the Colorado River, but the Colorado River is also experiencing historically low levels and drought conditions. Countless other communities also rely on the Colorado River as a water source, so this practice is not sustainable in the long term. In fact, the EIR only analyzes and accounts for the water supply through 2040, which is relatively soon. With exponential population growth expected, and the continuing effects of climate change, this analysis needs to account for a much longer period of time. The updated *Coachella Valley Water Management Plan* even admits:

E-4

There are a number of uncertainties inherent in the demand projections, including:

- Growth forecasts or rates of growth may be too high or too low
- Impacts of economic booms and busts
- Reductions in fish farm operations
- Rates of development on Tribal lands
- Rate of agricultural/vacant land conversion to urban use
- Future water demand factors for various land uses
- Growth outside the Whitewater River subbasin
- Number of future golf courses developed in the East Valley
- Acceptance and effects of water conservation measures

It quickly goes on to say that "climate change could affect the long term supplies of both the SWP and Colorado River and water demands within the Valley" MWH, *Coachella Valley Water Management Plan Update* § ES-16 (2012).

E-4 Cont.

The Project (even with extensive mitigation) is projected to demand over 18 million gallons of water per year, around 1.25 million of that being loss due to backwash and evaporation from the pools, spas, and the surf lagoon. If not for artificial recharge from other declining sources, the area would have nowhere near enough water supply for the demand and it is therefore unsustainable to continue to grow the demand by such great margins. Projects that allow for such a high degree of wasted resources, i.e. the amount of water lost due to evaporation, should not be permitted to put pressure on already declining aquifers. This is especially true when the climate crisis is creating an uncertain future where sustainability and demand on aquifers are getting harder and harder to predict.

E-5

We are also deeply concerned about the impact of the Project on the area's burrowing owl population. Long-term studies need to be conducted on burrowing owls in the area. Previous studies are minimal and preconstruction surveys, while protecting specific owls in the short-term, would not accurately represent any long-term effects on local populations.

Western burrowing owls are at risk of going extinct in areas of California, and habitat degradation and fragmentation are the most pressing issues facing the species. This project has a potentially significant impact. As burrowing owls are ground nesting, there are almost no possible methods of mitigation, and any amount of disturbance in their direct habitat would eliminate them. Attempts have been made to relocate burrowing owls in other areas of California, but the success rates has been inconsistent. Attempts have also been made to create imitation burrows to attract owls to a new area, but those have also been mostly unsuccessful.

E-6

San Diego Zoo conservationists affirm that current mitigation strategies have no proven record of success and further research is required into the best methods of mitigation for this species. **E-6 Cont.**

Protection of the burrowing owls themselves is not the only relevant factor, as the owls rely heavily on ground squirrels as a primary source of prey. The Project could also potentially impact local ground squirrel populations, but this discussion is absent from the EIR. Further surveys need to be done in order to better understand the permanent direct and indirect impacts on the area ground squirrel population. **E-7**

The Project will also result in significantly compromised air quality in the area throughout the construction process, and potentially once the development is completed. Removal of stabilized soils and biological soil crust creates a destructive cycle of airborne particulates and erosion. As more stabilized soils are removed, blowing particulates from recently eroded areas act as abrasive catalysts that erode the remaining crusts thus resulting in more airborne particulates. **E-8**

As stated in the current EIR, development-related NOx emissions would "violate State or Federal air quality standards for NOx emissions, which subsequently will substantially contribute to the existing ozone violation in the Salton Sea Air Basin." The EIR had already discussed the compromised air quality in the area due to environmental and weather factors, admitting that particulates are often held in the area, creating ongoing air quality issues. The EIR in fact, goes on to say that even with full implementation of the mitigation measures, the "impacts associated with operations of the proposed Project at build out will remain significant and unavoidable" and "operational impacts will continue to exceed NOx emissions under the current analysis methods." A development with this effect on emissions is unacceptable amidst the current state of our climate crisis. **E-9**

The EIR needs to go farther in addressing the spike in greenhouse gas emissions during the potentially multiple year construction period. Due to the use of heavy construction equipment, unsafe levels of air pollutants would have an impact on the surrounding community and wildlife during that time. The presence of toxic air contaminants during construction is discussed in relation the sensitive human receptors, but ignores construction pollutant impact on wildlife and the ecosystem. **E-10**

Noise pollution, like air pollution, has significant health implications. Construction and traffic noise are some of the largest producers of noise pollution. Prolonged exposure to noise pollution can lead to hypertension and heart disease, hearing loss and consequential sleep disturbances. The surf lagoon is projected to stay open until midnight or 2 A.M., and the Project **E-11**

is projected to host around 12 special events per year. All of these elements will contribute heavily to noise pollution in the area. Noise pollution does not only adversely effect human lives. Wildlife, especially birds, are heavily impacted by increased noise pollution. Communication, mating behavior, hunting and survival instincts of animals are altered by excessive noise.

E-11 Cont.

As written, the EIR also glosses over the aggregate environmental impacts of the Project and misleads the reader through words such as "may" and "potentially." This Project cannot be viewed independently from other planned developments in the region. The EIR needs to address the cumulative effects of the Project in relation to other nearby projects and planned developments.

> The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Guidelines § 15355(b). Water demand, greenhouse gas emissions, noise and air pollution, and habitat fragmentation are aggregate and have cumulative effects. It would be a cataclysmic oversight for the City to allow the Project to move forward without fully analyzing this Project's impact in relation to the overall impact of other projects in the region that are currently in development or in the planning stages.

E-12

For all of the reasons stated above, we oppose the project as currently proposed. The Project's EIR must be rewritten to address all the environmental impacts. The current EIR misleads the reader as to the true impact of the Project. Only a rewritten and recirculated cumulative impacts analysis will allow the public to understand the true impact of the Project.

E-13

Sincerely,

John A. Belcher

Eric Ceja
Principal Planner
Ph: 760.346.0611 Direct: 760.776.6384
eceja@cityofpalmdesert.org

F

From: webmaster@cityofpalmdesert.org [mailto:webmaster@cityofpalmdesert.org]
Sent: Sunday, July 07, 2019 7:48 PM
To: Information Mail <info@cityofpalmdesert.org>
Subject: City of Palm Desert: Website Contact Us Form Submission

A new entry to a form/survey has been submitted.

Form Name:	Contact Us
Date & Time:	07/07/2019 7:47 PM
Response #:	1710
Submitter ID:	13785
IP address:	24.249.30.62
Time to complete:	4 min. , 16 sec.

Survey Details

Page 1

Your Contact Information

First Name	Liridona	**Last Name**	Leti
Email Address	Leti.liridona@gmail.com	**Phone Number**	7604085738
Address	231 East San Fernando St	**Address 2**	Not answered
City	San Jose	**State**	California
ZIP Code	95112		

I am a:
(o) Palm Desert Resident

Comments or Concerns:
To whom it may concern,

You have to reconsider the wave pool that is happening at the golf course. This is extremely anti environmentally friendly and it will not help the DESERT whatsoever. Please notice that I emphasized DESERT, we live in the desert where what you are allowing should not happen. CA has already had two major earthquakes in the last week and if you think depleting the natural resources will help, think again. All that you are allowing is more earthquakes and potholes to occur. F-1

Do not let this go through, stop it before it gets worse.

Thank you,
City of Palm Desert

Appendix B
Revised CalEEMod Outputs

DSRT SURF Proposed Project SP Buildout

Salton Sea Air Basin, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	520.00	Space	3.51	208,000.00	0
Other Asphalt Surfaces	1.50	Acre	1.00	65,340.00	0
High Turnover (Sit Down Restaurant)	11.25	1000sqft	0.26	11,250.00	0
Hotel	438.00	Room	6.00	500,000.00	0
Recreational Swimming Pool	261.36	1000sqft	6.00	261,360.00	0
Regional Shopping Center	45.00	1000sqft	1.03	45,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	3.4	**Precipitation Freq (Days)**	20
Climate Zone	15			**Operational Year**	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Assumptions made due to SP level information. See AQ/GHG report for assumption breakdown.

Construction Phase - Assumes a 2-year buildout

Off-road Equipment - Number of equipment increased.

Off-road Equipment - Added material handling equipment for export. Hours reduced from 8 to 7 per day to account for worker breaks, refueling, maintenance etc.

Trips and VMT - Worse case scenario haul trip is 3.25 miles north to the Classic Club material dumping site.

On-road Fugitive Dust - All roads in project area are paced.

Grading - Excavation for the lagoon will require approx. 103,000 CY of export.

Architectural Coating - Use of low VOC coatings per SCAQMD Rule 1113

Vehicle Trips - Per Traffic Report, total project daily trips = 5496. Assumes some visitors may be coming from greater distances, 25 miles average per trip assumed.

Road Dust - All roads paved.

Energy Use - All electricity will be Title 24 approved. Lagoon wave machine and lighting assumptions accounted for in "Regional Shopping Center."

Construction Off-road Equipment Mitigation - Standard requirements per SCAQMD Rule 403.1 Dust Control.

Off-road Equipment - Hours per day reduced to account for worker breaks, refueling, maintenance etc.

Off-road Equipment -

Off-road Equipment - Hours per day reduced from 8 to 7 to account for worker breaks, refueling, maintenance etc.

Table Name	Column Name	Default Value	New Value
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tblArchitecturalCoating	EF_Nonresidential_Interior	150.00	125.00
tblArchitecturalCoating	EF_Parking	150.00	125.00
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.5
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	40
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final

tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	20.00	110.00
tblConstructionPhase	NumDays	300.00	350.00
tblConstructionPhase	NumDays	30.00	90.00
tblConstructionPhase	NumDays	20.00	55.00
tblConstructionPhase	NumDays	10.00	20.00
tblEnergyUse	NT24E	0.19	0.00
tblEnergyUse	NT24E	28.48	0.00
tblEnergyUse	NT24E	6.23	0.00
tblEnergyUse	NT24E	2.44	0.00
tblEnergyUse	T24E	3.92	4.00
tblEnergyUse	T24E	12.38	41.00
tblEnergyUse	T24E	6.47	13.00
tblEnergyUse	T24E	4.58	233.50
tblGrading	AcresOfGrading	196.88	17.80
tblGrading	MaterialExported	0.00	103,000.00
tblLandUse	LandUseSquareFeet	635,976.00	500,000.00

tblLandUse	LotAcreage	4.68	3.51
tblLandUse	LotAcreage	1.50	1.00
tblLandUse	LotAcreage	14.60	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblRoadDust	RoadPercentPave	50	100

tblTripsAndVMT	HaulingTripLength	20.00	3.50
tblTripsAndVMT	WorkerTripNumber	28.00	20.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	ST_TR	158.37	56.17
tblVehicleTrips	ST_TR	8.19	8.36
tblVehicleTrips	ST_TR	9.10	4.30
tblVehicleTrips	ST_TR	49.97	1.68
tblVehicleTrips	SU_TR	131.84	56.17
tblVehicleTrips	SU_TR	5.95	8.36
tblVehicleTrips	SU_TR	13.60	4.30
tblVehicleTrips	SU_TR	25.24	1.68
tblVehicleTrips	WD_TR	127.15	56.17
tblVehicleTrips	WD_TR	8.17	8.36
tblVehicleTrips	WD_TR	33.82	4.30
tblVehicleTrips	WD_TR	42.70	1.68

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.4724	5.3654	3.4721	8.4000e-003	0.5662	0.1979	0.7642	0.2670	0.1833	0.4503	0.0000	766.2129	766.2129	0.1654	0.0000	770.3483
2020	0.8112	6.3935	6.0405	0.0156	0.6090	0.2273	0.8364	0.1644	0.2155	0.3798	0.0000	1,404.6866	1,404.6866	0.1674	0.0000	1,408.8710
2021	3.4340	1.1112	1.2679	3.2200e-003	0.1482	0.0382	0.1864	0.0398	0.0365	0.0763	0.0000	289.6175	289.6175	0.0300	0.0000	290.3671
Maximum	**3.4340**	**6.3935**	**6.0405**	**0.0156**	**0.6090**	**0.2273**	**0.8364**	**0.2670**	**0.2155**	**0.4503**	**0.0000**	**1,404.6866**	**1,404.6866**	**0.1674**	**0.0000**	**1,408.8710**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.4724	5.3654	3.4721	8.4000e-003	0.2994	0.1979	0.4973	0.1254	0.1833	0.3087	0.0000	766.2123	766.2123	0.1654	0.0000	770.3478
2020	0.8112	6.3935	6.0405	0.0156	0.6090	0.2273	0.8364	0.1644	0.2155	0.3798	0.0000	1,404.6861	1,404.6861	0.1674	0.0000	1,408.8704
2021	3.4340	1.1112	1.2679	3.2200e-003	0.1482	0.0382	0.1864	0.0398	0.0365	0.0763	0.0000	289.6174	289.6174	0.0300	0.0000	290.3670
Maximum	**3.4340**	**6.3935**	**6.0405**	**0.0156**	**0.6090**	**0.2273**	**0.8364**	**0.1644**	**0.2155**	**0.3798**	**0.0000**	**1,404.6861**	**1,404.6861**	**0.1674**	**0.0000**	**1,408.8704**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**20.16**	**0.00**	**14.93**	**30.06**	**0.00**	**15.63**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**6-3-2019**	**9-2-2019**	2.4189	2.4189
2	**9-3-2019**	**12-2-2019**	2.6197	2.6197
3	**12-3-2019**	**3-2-2020**	2.0759	2.0759
4	**3-3-2020**	**6-2-2020**	1.7881	1.7881
5	**6-3-2020**	**9-2-2020**	1.7930	1.7930
6	**9-3-2020**	**12-2-2020**	1.7629	1.7629
7	**12-3-2020**	**3-2-2021**	2.9838	2.9838
8	**3-3-2021**	**6-2-2021**	2.0899	2.0899
9	**6-3-2021**	**9-2-2021**	0.0222	0.0222
		Highest	2.9838	2.9838

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	2.5836	1.1000e-004	0.0118	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0228	0.0228	6.0000e-005	0.0000	0.0243
Energy	0.1789	1.6265	1.3663	9.7600e-003		0.1236	0.1236		0.1236	0.1236	0.0000	8,688.4747	8,688.4747	0.3195	0.0916	8,723.7455
Mobile	2.1852	19.7303	22.0144	0.0821	4.7277	0.0578	4.7855	1.2701	0.0544	1.3245	0.0000	7,636.5789	7,636.5789	0.5791	0.0000	7,651.0568
Waste						0.0000	0.0000		0.0000	0.0000	387.8528	0.0000	387.8528	22.9214	0.0000	960.8889
Water						0.0000	0.0000		0.0000	0.0000	10.5697	184.1322	194.7019	1.0932	0.0272	230.1398
Total	**4.9478**	**21.3569**	**23.3925**	**0.0919**	**4.7277**	**0.1814**	**4.9092**	**1.2701**	**0.1781**	**1.4482**	**398.4225**	**16,509.2086**	**16,907.6311**	**24.9134**	**0.1188**	**17,565.8554**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	2.5836	1.1000e-004	0.0118	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0228	0.0228	6.0000e-005	0.0000	0.0243
Energy	0.1789	1.6265	1.3663	9.7600e-003		0.1236	0.1236		0.1236	0.1236	0.0000	8,688.4747	8,688.4747	0.3195	0.0916	8,723.7455
Mobile	2.1852	19.7303	22.0144	0.0821	4.7277	0.0578	4.7855	1.2701	0.0544	1.3245	0.0000	7,636.5789	7,636.5789	0.5791	0.0000	7,651.0568
Waste						0.0000	0.0000		0.0000	0.0000	387.8528	0.0000	387.8528	22.9214	0.0000	960.8889
Water						0.0000	0.0000		0.0000	0.0000	10.5697	184.1322	194.7019	1.0932	0.0272	230.1398
Total	**4.9478**	**21.3569**	**23.3925**	**0.0919**	**4.7277**	**0.1814**	**4.9092**	**1.2701**	**0.1781**	**1.4482**	**398.4225**	**16,509.2086**	**16,907.6311**	**24.9134**	**0.1188**	**17,565.8554**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/3/2019	6/28/2019	5	20	
2	Grading	Grading	6/29/2019	11/1/2019	5	90	
3	Paving	Paving	11/1/2019	1/16/2020	5	55	
4	Building Construction	Building Construction	11/2/2019	3/5/2021	5	350	
5	Architectural Coating	Architectural Coating	1/1/2021	6/3/2021	5	110	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 17.8

Acres of Paving: 4.51

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 834,375; Non-Residential Outdoor: 278,125; Striped Parking Area: 16,400 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	7.00	158	0.38
Grading	Graders	1	7.00	187	0.41
Grading	Other Material Handling Equipment	3	7.00	168	0.40
Grading	Rubber Tired Dozers	1	7.00	247	0.40
Grading	Scrapers	2	7.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Building Construction	Cranes	2	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	2	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Grading	11	20.00	0.00	12,875.00	11.00	5.40	3.50	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	12	454.00	179.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	91.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use Soil Stabilizer

Water Exposed Area

3.2 Site Preparation - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0434	0.4557	0.2206	3.8000e-004		0.0239	0.0239		0.0220	0.0220	0.0000	34.1687	34.1687	0.0108	0.0000	34.4390
Total	**0.0434**	**0.4557**	**0.2206**	**3.8000e-004**	**0.1807**	**0.0239**	**0.2046**	**0.0993**	**0.0220**	**0.1213**	**0.0000**	**34.1687**	**34.1687**	**0.0108**	**0.0000**	**34.4390**

3.2 Site Preparation - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.9000e-004	7.5000e-004	7.3800e-003	1.0000e-005	1.4900e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.0000e-004	0.0000	1.3127	1.3127	6.0000e-005	0.0000	1.3142
Total	**9.9000e-004**	**7.5000e-004**	**7.3800e-003**	**1.0000e-005**	**1.4900e-003**	**1.0000e-005**	**1.5000e-003**	**4.0000e-004**	**1.0000e-005**	**4.0000e-004**	**0.0000**	**1.3127**	**1.3127**	**6.0000e-005**	**0.0000**	**1.3142**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0705	0.0000	0.0705	0.0387	0.0000	0.0387	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0434	0.4557	0.2206	3.8000e-004		0.0239	0.0239		0.0220	0.0220	0.0000	34.1687	34.1687	0.0108	0.0000	34.4389
Total	**0.0434**	**0.4557**	**0.2206**	**3.8000e-004**	**0.0705**	**0.0239**	**0.0944**	**0.0387**	**0.0220**	**0.0607**	**0.0000**	**34.1687**	**34.1687**	**0.0108**	**0.0000**	**34.4389**

3.2 Site Preparation - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.9000e-004	7.5000e-004	7.3800e-003	1.0000e-005	1.4900e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.0000e-004	0.0000	1.3127	1.3127	6.0000e-005	0.0000	1.3142
Total	**9.9000e-004**	**7.5000e-004**	**7.3800e-003**	**1.0000e-005**	**1.4900e-003**	**1.0000e-005**	**1.5000e-003**	**4.0000e-004**	**1.0000e-005**	**4.0000e-004**	**0.0000**	**1.3127**	**1.3127**	**6.0000e-005**	**0.0000**	**1.3142**

3.3 Grading - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.2568	0.0000	0.2568	0.1329	0.0000	0.1329	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2257	2.5351	1.7602	3.1200e-003		0.1133	0.1133		0.1042	0.1042	0.0000	280.6324	280.6324	0.0888	0.0000	282.8521
Total	**0.2257**	**2.5351**	**1.7602**	**3.1200e-003**	**0.2568**	**0.1133**	**0.3701**	**0.1329**	**0.1042**	**0.2371**	**0.0000**	**280.6324**	**280.6324**	**0.0888**	**0.0000**	**282.8521**

3.3 Grading - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0213	0.9344	0.1090	1.7900e-003	0.0197	1.4000e-003	0.0211	5.4100e-003	1.3400e-003	6.7500e-003	0.0000	170.1753	170.1753	0.0240	0.0000	170.7757
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.9300e-003	3.7500e-003	0.0369	7.0000e-005	7.4400e-003	5.0000e-005	7.4900e-003	1.9800e-003	4.0000e-005	2.0200e-003	0.0000	6.5636	6.5636	3.0000e-004	0.0000	6.5711
Total	**0.0262**	**0.9381**	**0.1459**	**1.8600e-003**	**0.0271**	**1.4500e-003**	**0.0286**	**7.3900e-003**	**1.3800e-003**	**8.7700e-003**	**0.0000**	**176.7388**	**176.7388**	**0.0243**	**0.0000**	**177.3468**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1002	0.0000	0.1002	0.0518	0.0000	0.0518	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2257	2.5351	1.7601	3.1200e-003		0.1133	0.1133		0.1042	0.1042	0.0000	280.6320	280.6320	0.0888	0.0000	282.8518
Total	**0.2257**	**2.5351**	**1.7601**	**3.1200e-003**	**0.1002**	**0.1133**	**0.2134**	**0.0518**	**0.1042**	**0.1560**	**0.0000**	**280.6320**	**280.6320**	**0.0888**	**0.0000**	**282.8518**

3.3 Grading - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0213	0.9344	0.1090	1.7900e-003	0.0197	1.4000e-003	0.0211	5.4100e-003	1.3400e-003	6.7500e-003	0.0000	170.1753	170.1753	0.0240	0.0000	170.7757
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.9300e-003	3.7500e-003	0.0369	7.0000e-005	7.4400e-003	5.0000e-005	7.4900e-003	1.9800e-003	4.0000e-005	2.0200e-003	0.0000	6.5636	6.5636	3.0000e-004	0.0000	6.5711
Total	**0.0262**	**0.9381**	**0.1459**	**1.8600e-003**	**0.0271**	**1.4500e-003**	**0.0286**	**7.3900e-003**	**1.3800e-003**	**8.7700e-003**	**0.0000**	**176.7388**	**176.7388**	**0.0243**	**0.0000**	**177.3468**

3.4 Paving - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0313	0.3278	0.3153	4.9000e-004		0.0177	0.0177		0.0163	0.0163	0.0000	44.0216	44.0216	0.0139	0.0000	44.3698
Paving	1.0200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0323**	**0.3278**	**0.3153**	**4.9000e-004**		**0.0177**	**0.0177**		**0.0163**	**0.0163**	**0.0000**	**44.0216**	**44.0216**	**0.0139**	**0.0000**	**44.3698**

3.4 Paving - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7700e-003	1.3400e-003	0.0132	3.0000e-005	2.6700e-003	2.0000e-005	2.6800e-003	7.1000e-004	2.0000e-005	7.2000e-004	0.0000	2.3519	2.3519	1.1000e-004	0.0000	2.3547
Total	**1.7700e-003**	**1.3400e-003**	**0.0132**	**3.0000e-005**	**2.6700e-003**	**2.0000e-005**	**2.6800e-003**	**7.1000e-004**	**2.0000e-005**	**7.2000e-004**	**0.0000**	**2.3519**	**2.3519**	**1.1000e-004**	**0.0000**	**2.3547**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0313	0.3278	0.3153	4.9000e-004		0.0177	0.0177		0.0163	0.0163	0.0000	44.0216	44.0216	0.0139	0.0000	44.3698
Paving	1.0200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0323**	**0.3278**	**0.3153**	**4.9000e-004**		**0.0177**	**0.0177**		**0.0163**	**0.0163**	**0.0000**	**44.0216**	**44.0216**	**0.0139**	**0.0000**	**44.3698**

3.4 Paving - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7700e-003	1.3400e-003	0.0132	3.0000e-005	2.6700e-003	2.0000e-005	2.6800e-003	7.1000e-004	2.0000e-005	7.2000e-004	0.0000	2.3519	2.3519	1.1000e-004	0.0000	2.3547
Total	**1.7700e-003**	**1.3400e-003**	**0.0132**	**3.0000e-005**	**2.6700e-003**	**2.0000e-005**	**2.6800e-003**	**7.1000e-004**	**2.0000e-005**	**7.2000e-004**	**0.0000**	**2.3519**	**2.3519**	**1.1000e-004**	**0.0000**	**2.3547**

3.4 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.1400e-003	0.0844	0.0879	1.4000e-004		4.5200e-003	4.5200e-003		4.1600e-003	4.1600e-003	0.0000	12.0169	12.0169	3.8900e-003	0.0000	12.1141
Paving	2.9000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**8.4300e-003**	**0.0844**	**0.0879**	**1.4000e-004**		**4.5200e-003**	**4.5200e-003**		**4.1600e-003**	**4.1600e-003**	**0.0000**	**12.0169**	**12.0169**	**3.8900e-003**	**0.0000**	**12.1141**

3.4 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.6000e-004	3.4000e-004	3.3700e-003	1.0000e-005	7.4000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6355	0.6355	3.0000e-005	0.0000	0.6362
Total	**4.6000e-004**	**3.4000e-004**	**3.3700e-003**	**1.0000e-005**	**7.4000e-004**	**0.0000**	**7.5000e-004**	**2.0000e-004**	**0.0000**	**2.0000e-004**	**0.0000**	**0.6355**	**0.6355**	**3.0000e-005**	**0.0000**	**0.6362**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	8.1400e-003	0.0844	0.0879	1.4000e-004		4.5200e-003	4.5200e-003		4.1600e-003	4.1600e-003	0.0000	12.0169	12.0169	3.8900e-003	0.0000	12.1141
Paving	2.9000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**8.4300e-003**	**0.0844**	**0.0879**	**1.4000e-004**		**4.5200e-003**	**4.5200e-003**		**4.1600e-003**	**4.1600e-003**	**0.0000**	**12.0169**	**12.0169**	**3.8900e-003**	**0.0000**	**12.1141**

3.4 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.6000e-004	3.4000e-004	3.3700e-003	1.0000e-005	7.4000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6355	0.6355	3.0000e-005	0.0000	0.6362
Total	**4.6000e-004**	**3.4000e-004**	**3.3700e-003**	**1.0000e-005**	**7.4000e-004**	**0.0000**	**7.5000e-004**	**2.0000e-004**	**0.0000**	**2.0000e-004**	**0.0000**	**0.6355**	**0.6355**	**3.0000e-005**	**0.0000**	**0.6362**

3.5 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0763	0.6665	0.5187	8.6000e-004		0.0386	0.0386		0.0366	0.0366	0.0000	74.7157	74.7157	0.0165	0.0000	75.1270
Total	**0.0763**	**0.6665**	**0.5187**	**8.6000e-004**		**0.0386**	**0.0386**		**0.0366**	**0.0366**	**0.0000**	**74.7157**	**74.7157**	**0.0165**	**0.0000**	**75.1270**

3.5 Building Construction - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0136	0.4004	0.0998	8.7000e-004	0.0187	2.4400e-003	0.0211	5.3900e-003	2.3300e-003	7.7300e-003	0.0000	82.7411	82.7411	7.7400e-003	0.0000	82.9347
Worker	0.0523	0.0397	0.3910	7.7000e-004	0.0788	5.2000e-004	0.0793	0.0209	4.8000e-004	0.0214	0.0000	69.5299	69.5299	3.2100e-003	0.0000	69.6101
Total	**0.0658**	**0.4402**	**0.4908**	**1.6400e-003**	**0.0975**	**2.9600e-003**	**0.1005**	**0.0263**	**2.8100e-003**	**0.0291**	**0.0000**	**152.2710**	**152.2710**	**0.0110**	**0.0000**	**152.5448**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0763	0.6665	0.5187	8.6000e-004		0.0386	0.0386		0.0366	0.0366	0.0000	74.7156	74.7156	0.0165	0.0000	75.1269
Total	**0.0763**	**0.6665**	**0.5187**	**8.6000e-004**		**0.0386**	**0.0386**		**0.0366**	**0.0366**	**0.0000**	**74.7156**	**74.7156**	**0.0165**	**0.0000**	**75.1269**

3.5 Building Construction - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0136	0.4004	0.0998	8.7000e-004	0.0187	2.4400e-003	0.0211	5.3900e-003	2.3300e-003	7.7300e-003	0.0000	82.7411	82.7411	7.7400e-003	0.0000	82.9347
Worker	0.0523	0.0397	0.3910	7.7000e-004	0.0788	5.2000e-004	0.0793	0.0209	4.8000e-004	0.0214	0.0000	69.5299	69.5299	3.2100e-003	0.0000	69.6101
Total	**0.0658**	**0.4402**	**0.4908**	**1.6400e-003**	**0.0975**	**2.9600e-003**	**0.1005**	**0.0263**	**2.8100e-003**	**0.0291**	**0.0000**	**152.2710**	**152.2710**	**0.0110**	**0.0000**	**152.5448**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.4268	3.7929	3.1665	5.3800e-003		0.2089	0.2089		0.1981	0.1981	0.0000	460.2145	460.2145	0.1006	0.0000	462.7302
Total	**0.4268**	**3.7929**	**3.1665**	**5.3800e-003**		**0.2089**	**0.2089**		**0.1981**	**0.1981**	**0.0000**	**460.2145**	**460.2145**	**0.1006**	**0.0000**	**462.7302**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0739	2.2921	0.5586	5.3900e-003	0.1166	0.0107	0.1274	0.0337	0.0103	0.0439	0.0000	511.8764	511.8764	0.0448	0.0000	512.9954
Worker	0.3017	0.2237	2.2241	4.6600e-003	0.4917	3.1400e-003	0.4948	0.1305	2.9000e-003	0.1334	0.0000	419.9433	419.9433	0.0181	0.0000	420.3951
Total	**0.3756**	**2.5159**	**2.7827**	**0.0101**	**0.6083**	**0.0139**	**0.6222**	**0.1642**	**0.0132**	**0.1774**	**0.0000**	**931.8197**	**931.8197**	**0.0628**	**0.0000**	**933.3905**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.4268	3.7929	3.1665	5.3800e-003		0.2089	0.2089		0.1981	0.1981	0.0000	460.2139	460.2139	0.1006	0.0000	462.7296
Total	**0.4268**	**3.7929**	**3.1665**	**5.3800e-003**		**0.2089**	**0.2089**		**0.1981**	**0.1981**	**0.0000**	**460.2139**	**460.2139**	**0.1006**	**0.0000**	**462.7296**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0739	2.2921	0.5586	5.3900e-003	0.1166	0.0107	0.1274	0.0337	0.0103	0.0439	0.0000	511.8764	511.8764	0.0448	0.0000	512.9954
Worker	0.3017	0.2237	2.2241	4.6600e-003	0.4917	3.1400e-003	0.4948	0.1305	2.9000e-003	0.1334	0.0000	419.9433	419.9433	0.0181	0.0000	420.3951
Total	**0.3756**	**2.5159**	**2.7827**	**0.0101**	**0.6083**	**0.0139**	**0.6222**	**0.1642**	**0.0132**	**0.1774**	**0.0000**	**931.8197**	**931.8197**	**0.0628**	**0.0000**	**933.3905**

3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0672	0.6061	0.5454	9.5000e-004		0.0316	0.0316		0.0299	0.0299	0.0000	80.8064	80.8064	0.0174	0.0000	81.2409
Total	**0.0672**	**0.6061**	**0.5454**	**9.5000e-004**		**0.0316**	**0.0316**		**0.0299**	**0.0299**	**0.0000**	**80.8064**	**80.8064**	**0.0174**	**0.0000**	**81.2409**

3.5 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0114	0.3684	0.0882	9.4000e-004	0.0205	6.6000e-004	0.0211	5.9100e-003	6.4000e-004	6.5400e-003	0.0000	89.3677	89.3677	7.3400e-003	0.0000	89.5513
Worker	0.0494	0.0357	0.3612	7.9000e-004	0.0863	5.4000e-004	0.0869	0.0229	5.0000e-004	0.0234	0.0000	71.2496	71.2496	2.9100e-003	0.0000	71.3223
Total	**0.0608**	**0.4040**	**0.4494**	**1.7300e-003**	**0.1068**	**1.2000e-003**	**0.1080**	**0.0288**	**1.1400e-003**	**0.0300**	**0.0000**	**160.6173**	**160.6173**	**0.0103**	**0.0000**	**160.8735**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0672	0.6061	0.5454	9.5000e-004		0.0316	0.0316		0.0299	0.0299	0.0000	80.8063	80.8063	0.0174	0.0000	81.2408
Total	**0.0672**	**0.6061**	**0.5454**	**9.5000e-004**		**0.0316**	**0.0316**		**0.0299**	**0.0299**	**0.0000**	**80.8063**	**80.8063**	**0.0174**	**0.0000**	**81.2408**

3.5 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0114	0.3684	0.0882	9.4000e-004	0.0205	6.6000e-004	0.0211	5.9100e-003	6.4000e-004	6.5400e-003	0.0000	89.3677	89.3677	7.3400e-003	0.0000	89.5513
Worker	0.0494	0.0357	0.3612	7.9000e-004	0.0863	5.4000e-004	0.0869	0.0229	5.0000e-004	0.0234	0.0000	71.2496	71.2496	2.9100e-003	0.0000	71.3223
Total	**0.0608**	**0.4040**	**0.4494**	**1.7300e-003**	**0.1068**	**1.2000e-003**	**0.1080**	**0.0288**	**1.1400e-003**	**0.0300**	**0.0000**	**160.6173**	**160.6173**	**0.0103**	**0.0000**	**160.8735**

3.6 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	3.2703					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0120	0.0840	0.1000	1.6000e-004		5.1800e-003	5.1800e-003		5.1800e-003	5.1800e-003	0.0000	14.0429	14.0429	9.6000e-004	0.0000	14.0670
Total	**3.2823**	**0.0840**	**0.1000**	**1.6000e-004**		**5.1800e-003**	**5.1800e-003**		**5.1800e-003**	**5.1800e-003**	**0.0000**	**14.0429**	**14.0429**	**9.6000e-004**	**0.0000**	**14.0670**

3.6 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0237	0.0171	0.1731	3.8000e-004	0.0414	2.6000e-004	0.0416	0.0110	2.4000e-004	0.0112	0.0000	34.1509	34.1509	1.3900e-003	0.0000	34.1858
Total	**0.0237**	**0.0171**	**0.1731**	**3.8000e-004**	**0.0414**	**2.6000e-004**	**0.0416**	**0.0110**	**2.4000e-004**	**0.0112**	**0.0000**	**34.1509**	**34.1509**	**1.3900e-003**	**0.0000**	**34.1858**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	3.2703					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0120	0.0840	0.1000	1.6000e-004		5.1800e-003	5.1800e-003		5.1800e-003	5.1800e-003	0.0000	14.0429	14.0429	9.6000e-004	0.0000	14.0670
Total	**3.2823**	**0.0840**	**0.1000**	**1.6000e-004**		**5.1800e-003**	**5.1800e-003**		**5.1800e-003**	**5.1800e-003**	**0.0000**	**14.0429**	**14.0429**	**9.6000e-004**	**0.0000**	**14.0670**

3.6 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0237	0.0171	0.1731	3.8000e-004	0.0414	2.6000e-004	0.0416	0.0110	2.4000e-004	0.0112	0.0000	34.1509	34.1509	1.3900e-003	0.0000	34.1858
Total	**0.0237**	**0.0171**	**0.1731**	**3.8000e-004**	**0.0414**	**2.6000e-004**	**0.0416**	**0.0110**	**2.4000e-004**	**0.0112**	**0.0000**	**34.1509**	**34.1509**	**1.3900e-003**	**0.0000**	**34.1858**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	2.1852	19.7303	22.0144	0.0821	4.7277	0.0578	4.7855	1.2701	0.0544	1.3245	0.0000	7,636.5789	7,636.5789	0.5791	0.0000	7,651.0568
Unmitigated	2.1852	19.7303	22.0144	0.0821	4.7277	0.0578	4.7855	1.2701	0.0544	1.3245	0.0000	7,636.5789	7,636.5789	0.5791	0.0000	7,651.0568

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Enclosed Parking with Elevator	0.00	0.00	0.00		
High Turnover (Sit Down Restaurant)	631.91	631.91	631.91	505,822	505,822
Hotel	3,661.68	3,661.68	3661.68	8,788,137	8,788,137
Other Asphalt Surfaces	0.00	0.00	0.00		
Recreational Swimming Pool	1,123.85	1,123.85	1123.85	2,754,828	2,754,828
Regional Shopping Center	75.60	75.60	75.60	164,431	164,431
Total	5,493.04	5,493.04	5,493.04	12,213,217	12,213,217

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Enclosed Parking with Elevator	12.50	4.20	5.40	0.00	0.00	0.00	0	0	0
High Turnover (Sit Down	12.50	4.20	5.40	8.50	72.50	19.00	37	20	43
Hotel	12.50	4.20	25.00	19.40	61.60	19.00	58	38	4
Other Asphalt Surfaces	12.50	4.20	5.40	0.00	0.00	0.00	0	0	0
Recreational Swimming Pool	12.50	4.20	25.00	33.00	48.00	19.00	52	39	9
Regional Shopping Center	12.50	4.20	25.00	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Enclosed Parking with Elevator	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
High Turnover (Sit Down Restaurant)	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Hotel	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Other Asphalt Surfaces	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Recreational Swimming Pool	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Regional Shopping Center	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	6,917.8048	6,917.8048	0.2856	0.0591	6,942.5535
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	6,917.8048	6,917.8048	0.2856	0.0591	6,942.5535
NaturalGas Mitigated	0.1789	1.6265	1.3663	9.7600e-003		0.1236	0.1236		0.1236	0.1236	0.0000	1,770.6699	1,770.6699	0.0339	0.0325	1,781.1921
NaturalGas Unmitigated	0.1789	1.6265	1.3663	9.7600e-003		0.1236	0.1236		0.1236	0.1236	0.0000	1,770.6699	1,770.6699	0.0339	0.0325	1,781.1921

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	3.0762e+006	0.0166	0.1508	0.1267	9.0000e-004		0.0115	0.0115		0.0115	0.0115	0.0000	164.1578	164.1578	3.1500e-003	3.0100e-003	165.1333
Hotel	3.0005e+007	0.1618	1.4708	1.2355	8.8200e-003		0.1118	0.1118		0.1118	0.1118	0.0000	1,601.1811	1,601.1811	0.0307	0.0294	1,610.6961
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	99900	5.4000e-004	4.9000e-003	4.1100e-003	3.0000e-005		3.7000e-004	3.7000e-004		3.7000e-004	3.7000e-004	0.0000	5.3310	5.3310	1.0000e-004	1.0000e-004	5.3627
Total		**0.1789**	**1.6265**	**1.3663**	**9.7500e-003**		**0.1236**	**0.1236**		**0.1236**	**0.1236**	**0.0000**	**1,770.6699**	**1,770.6699**	**0.0339**	**0.0325**	**1,781.1921**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	3.0762e+006	0.0166	0.1508	0.1267	9.0000e-004		0.0115	0.0115		0.0115	0.0115	0.0000	164.1578	164.1578	3.1500e-003	3.0100e-003	165.1333
Hotel	3.0005e+007	0.1618	1.4708	1.2355	8.8200e-003		0.1118	0.1118		0.1118	0.1118	0.0000	1,601.1811	1,601.1811	0.0307	0.0294	1,610.6961
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	99900	5.4000e-004	4.9000e-003	4.1100e-003	3.0000e-005		3.7000e-004	3.7000e-004		3.7000e-004	3.7000e-004	0.0000	5.3310	5.3310	1.0000e-004	1.0000e-004	5.3627
Total		**0.1789**	**1.6265**	**1.3663**	**9.7500e-003**		**0.1236**	**0.1236**		**0.1236**	**0.1236**	**0.0000**	**1,770.6699**	**1,770.6699**	**0.0339**	**0.0325**	**1,781.1921**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Enclosed Parking with Elevator	1.196e+006	381.0712	0.0157	3.2500e-003	382.4345
High Turnover (Sit Down Restaurant)	535725	170.6935	7.0500e-003	1.4600e-003	171.3041
Hotel	9.22e+006	2,937.6895	0.1213	0.0251	2,948.1992
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	1.076e+007	3,428.3506	0.1415	0.0293	3,440.6156
Total		**6,917.8048**	**0.2856**	**0.0591**	**6,942.5535**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Enclosed Parking with Elevator	1.196e+006	381.0712	0.0157	3.2500e-003	382.4345
High Turnover (Sit Down Restaurant)	535725	170.6935	7.0500e-003	1.4600e-003	171.3041
Hotel	9.22e+006	2,937.6895	0.1213	0.0251	2,948.1992
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	1.076e+007	3,428.3506	0.1415	0.0293	3,440.6156
Total		**6,917.8048**	**0.2856**	**0.0591**	**6,942.5535**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	2.5836	1.1000e-004	0.0118	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0228	0.0228	6.0000e-005	0.0000	0.0243
Unmitigated	2.5836	1.1000e-004	0.0118	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0228	0.0228	6.0000e-005	0.0000	0.0243

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3924					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.1901					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1000e-003	1.1000e-004	0.0118	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0228	0.0228	6.0000e-005	0.0000	0.0243
Total	**2.5836**	**1.1000e-004**	**0.0118**	**0.0000**		**4.0000e-005**	**4.0000e-005**		**4.0000e-005**	**4.0000e-005**	**0.0000**	**0.0228**	**0.0228**	**6.0000e-005**	**0.0000**	**0.0243**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3924					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.1901					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.1000e-003	1.1000e-004	0.0118	0.0000		4.0000e-005	4.0000e-005		4.0000e-005	4.0000e-005	0.0000	0.0228	0.0228	6.0000e-005	0.0000	0.0243
Total	**2.5836**	**1.1000e-004**	**0.0118**	**0.0000**		**4.0000e-005**	**4.0000e-005**		**4.0000e-005**	**4.0000e-005**	**0.0000**	**0.0228**	**0.0228**	**6.0000e-005**	**0.0000**	**0.0243**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	194.7019	1.0932	0.0272	230.1398
Unmitigated	194.7019	1.0932	0.0272	230.1398

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	3.41475 / 0.217963	16.0219	0.1119	2.7500e-003	19.6401
Hotel	11.1106 / 1.23452	53.9905	0.3641	8.9800e-003	65.7695
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	15.4577 / 9.47404	102.5713	0.5077	0.0127	119.0570
Regional Shopping Center	3.33326 / 2.04297	22.1183	0.1095	2.7400e-003	25.6733
Total		**194.7020**	**1.0932**	**0.0272**	**230.1398**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	3.41475 / 0.217963	16.0219	0.1119	2.7500e-003	19.6401
Hotel	11.1106 / 1.23452	53.9905	0.3641	8.9800e-003	65.7695
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	15.4577 / 9.47404	102.5713	0.5077	0.0127	119.0570
Regional Shopping Center	3.33326 / 2.04297	22.1183	0.1095	2.7400e-003	25.6733
Total		**194.7020**	**1.0932**	**0.0272**	**230.1398**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	387.8528	22.9214	0.0000	960.8889
Unmitigated	387.8528	22.9214	0.0000	960.8889

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	133.88	27.1764	1.6061	0.0000	67.3285
Hotel	239.81	48.6793	2.8769	0.0000	120.6008
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	1489.75	302.4058	17.8717	0.0000	749.1975
Regional Shopping Center	47.25	9.5913	0.5668	0.0000	23.7621
Total		**387.8528**	**22.9214**	**0.0000**	**960.8889**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	133.88	27.1764	1.6061	0.0000	67.3285
Hotel	239.81	48.6793	2.8769	0.0000	120.6008
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	1489.75	302.4058	17.8717	0.0000	749.1975
Regional Shopping Center	47.25	9.5913	0.5668	0.0000	23.7621
Total		**387.8528**	**22.9214**	**0.0000**	**960.8889**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

DSRT SURF Proposed Project SP Buildout

Salton Sea Air Basin, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	520.00	Space	3.51	208,000.00	0
Other Asphalt Surfaces	1.50	Acre	1.00	65,340.00	0
High Turnover (Sit Down Restaurant)	11.25	1000sqft	0.26	11,250.00	0
Hotel	438.00	Room	6.00	500,000.00	0
Recreational Swimming Pool	261.36	1000sqft	6.00	261,360.00	0
Regional Shopping Center	45.00	1000sqft	1.03	45,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	3.4	**Precipitation Freq (Days)**	20
Climate Zone	15			**Operational Year**	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Assumptions made due to SP level information. See AQ/GHG report for assumption breakdown.

Construction Phase - Assumes a 2-year buildout

Off-road Equipment - Number of equipment increased.

Off-road Equipment - Added material handling equipment for export. Hours reduced from 8 to 7 per day to account for worker breaks, refueling, maintenance etc.

Trips and VMT - Worse case scenario haul trip is 3.25 miles north to the Classic Club material dumping site.

On-road Fugitive Dust - All roads in project area are paced.

Grading - Excavation for the lagoon will require approx. 103,000 CY of export.

Architectural Coating - Use of low VOC coatings per SCAQMD Rule 1113

Vehicle Trips - Per Traffic Report, total project daily trips = 5496. Assumes some visitors may be coming from greater distances, 25 miles average per trip assumed.

Road Dust - All roads paved.

Energy Use - All electricity will be Title 24 approved. Lagoon wave machine and lighting assumptions accounted for in "Regional Shopping Center."

Construction Off-road Equipment Mitigation - Standard requirements per SCAQMD Rule 403.1 Dust Control.

Off-road Equipment - Hours per day reduced to account for worker breaks, refueling, maintenance etc.

Off-road Equipment -

Off-road Equipment - Hours per day reduced from 8 to 7 to account for worker breaks, refueling, maintenance etc.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	150.00	125.00
tblArchitecturalCoating	EF_Nonresidential_Interior	150.00	125.00
tblArchitecturalCoating	EF_Parking	150.00	125.00
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.5
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	40
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final

tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	20.00	110.00
tblConstructionPhase	NumDays	300.00	350.00
tblConstructionPhase	NumDays	30.00	90.00
tblConstructionPhase	NumDays	20.00	55.00
tblConstructionPhase	NumDays	10.00	20.00
tblEnergyUse	NT24E	0.19	0.00
tblEnergyUse	NT24E	28.48	0.00
tblEnergyUse	NT24E	6.23	0.00
tblEnergyUse	NT24E	2.44	0.00
tblEnergyUse	T24E	3.92	4.00
tblEnergyUse	T24E	12.38	41.00
tblEnergyUse	T24E	6.47	13.00
tblEnergyUse	T24E	4.58	233.50
tblGrading	AcresOfGrading	196.88	17.80
tblGrading	MaterialExported	0.00	103,000.00
tblLandUse	LandUseSquareFeet	635,976.00	500,000.00

DSRT SURF Proposed Project SP Buildout - Salton Sea Air Basin, Summer

tblLandUse	LotAcreage	4.68	3.51
tblLandUse	LotAcreage	1.50	1.00
tblLandUse	LotAcreage	14.60	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblRoadDust	RoadPercentPave	50	100

tblTripsAndVMT	HaulingTripLength	20.00	3.50
tblTripsAndVMT	WorkerTripNumber	28.00	20.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	ST_TR	158.37	56.17
tblVehicleTrips	ST_TR	8.19	8.36
tblVehicleTrips	ST_TR	9.10	4.30
tblVehicleTrips	ST_TR	49.97	1.68
tblVehicleTrips	SU_TR	131.84	56.17
tblVehicleTrips	SU_TR	5.95	8.36
tblVehicleTrips	SU_TR	13.60	4.30
tblVehicleTrips	SU_TR	25.24	1.68
tblVehicleTrips	WD_TR	127.15	56.17
tblVehicleTrips	WD_TR	8.17	8.36
tblVehicleTrips	WD_TR	33.82	4.30
tblVehicleTrips	WD_TR	42.70	1.68

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	8.8450	92.5889	67.8518	0.1483	18.2169	3.3731	20.6082	9.9706	3.1043	12.1707	0.0000	14,784.9732	14,784.9732	3.4623	0.0000	14,839.1529
2020	8.0564	62.1293	64.7387	0.1466	4.8229	2.4536	7.2765	1.2998	2.3056	3.6054	0.0000	14,517.3833	14,517.3833	2.1017	0.0000	14,569.9264
2021	66.1554	45.6644	52.6979	0.1315	5.4588	1.5232	6.9820	1.4685	1.4487	2.9171	0.0000	13,063.1110	13,063.1110	1.3809	0.0000	13,097.6326
Maximum	**66.1554**	**92.5889**	**67.8518**	**0.1483**	**18.2169**	**3.3731**	**20.6082**	**9.9706**	**3.1043**	**12.1707**	**0.0000**	**14,784.9732**	**14,784.9732**	**3.4623**	**0.0000**	**14,839.1529**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	8.8450	92.5889	67.8518	0.1483	7.1964	3.3731	9.5878	3.9129	3.1043	6.1129	0.0000	14,784.9732	14,784.9732	3.4623	0.0000	14,839.1529
2020	8.0564	62.1293	64.7387	0.1466	4.8229	2.4536	7.2765	1.2998	2.3056	3.6054	0.0000	14,517.3833	14,517.3833	2.1017	0.0000	14,569.9264
2021	66.1554	45.6644	52.6979	0.1315	5.4588	1.5232	6.9820	1.4685	1.4487	2.9171	0.0000	13,063.1110	13,063.1110	1.3809	0.0000	13,097.6326
Maximum	**66.1554**	**92.5889**	**67.8518**	**0.1483**	**7.1964**	**3.3731**	**9.5878**	**3.9129**	**3.1043**	**6.1129**	**0.0000**	**14,784.9732**	**14,784.9732**	**3.4623**	**0.0000**	**14,839.1529**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**38.67**	**0.00**	**31.61**	**47.55**	**0.00**	**32.41**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Energy	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105
Mobile	14.8306	107.9586	141.9591	0.4792	26.2804	0.3143	26.5947	7.0531	0.2960	7.3491		49,065.9757	49,065.9757	3.5120		49,153.7766
Total	**29.9741**	**116.8723**	**149.5764**	**0.5327**	**26.2804**	**0.9921**	**27.2725**	**7.0531**	**0.9739**	**8.0269**		**59,761.2109**	**59,761.2109**	**3.7178**	**0.1961**	**59,912.5851**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Energy	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105
Mobile	14.8306	107.9586	141.9591	0.4792	26.2804	0.3143	26.5947	7.0531	0.2960	7.3491		49,065.9757	49,065.9757	3.5120		49,153.7766
Total	**29.9741**	**116.8723**	**149.5764**	**0.5327**	**26.2804**	**0.9921**	**27.2725**	**7.0531**	**0.9739**	**8.0269**		**59,761.2109**	**59,761.2109**	**3.7178**	**0.1961**	**59,912.5851**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/3/2019	6/28/2019	5	20	
2	Grading	Grading	6/29/2019	11/1/2019	5	90	
3	Paving	Paving	11/1/2019	1/16/2020	5	55	
4	Building Construction	Building Construction	11/2/2019	3/5/2021	5	350	
5	Architectural Coating	Architectural Coating	1/1/2021	6/3/2021	5	110	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 17.8

Acres of Paving: 4.51

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 834,375; Non-Residential Outdoor: 278,125; Striped Parking Area: 16,400 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	7.00	158	0.38
Grading	Graders	1	7.00	187	0.41
Grading	Other Material Handling Equipment	3	7.00	168	0.40
Grading	Rubber Tired Dozers	1	7.00	247	0.40
Grading	Scrapers	2	7.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Building Construction	Cranes	2	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	2	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Grading	11	20.00	0.00	12,875.00	11.00	5.40	3.50	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	12	454.00	179.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	91.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use Soil Stabilizer

Water Exposed Area

3.2 Site Preparation - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	4.3350	45.5727	22.0630	0.0380		2.3904	2.3904		2.1991	2.1991		3,766.4529	3,766.4529	1.1917		3,796.2445
Total	**4.3350**	**45.5727**	**22.0630**	**0.0380**	**18.0663**	**2.3904**	**20.4566**	**9.9307**	**2.1991**	**12.1298**		**3,766.4529**	**3,766.4529**	**1.1917**		**3,796.2445**

3.2 Site Preparation - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1179	0.0742	0.9228	1.6100e-003	0.1506	9.8000e-004	0.1516	0.0400	9.0000e-004	0.0408		160.0181	160.0181	7.7700e-003		160.2123
Total	**0.1179**	**0.0742**	**0.9228**	**1.6100e-003**	**0.1506**	**9.8000e-004**	**0.1516**	**0.0400**	**9.0000e-004**	**0.0408**		**160.0181**	**160.0181**	**7.7700e-003**		**160.2123**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.0458	0.0000	7.0458	3.8730	0.0000	3.8730			0.0000			0.0000
Off-Road	4.3350	45.5727	22.0630	0.0380		2.3904	2.3904		2.1991	2.1991	0.0000	3,766.4529	3,766.4529	1.1917		3,796.2445
Total	**4.3350**	**45.5727**	**22.0630**	**0.0380**	**7.0458**	**2.3904**	**9.4362**	**3.8730**	**2.1991**	**6.0721**	**0.0000**	**3,766.4529**	**3,766.4529**	**1.1917**		**3,796.2445**

3.2 Site Preparation - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1179	0.0742	0.9228	1.6100e-003	0.1506	9.8000e-004	0.1516	0.0400	9.0000e-004	0.0408		160.0181	160.0181	7.7700e-003		160.2123
Total	**0.1179**	**0.0742**	**0.9228**	**1.6100e-003**	**0.1506**	**9.8000e-004**	**0.1516**	**0.0400**	**9.0000e-004**	**0.0408**		**160.0181**	**160.0181**	**7.7700e-003**		**160.2123**

3.3 Grading - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7070	0.0000	5.7070	2.9536	0.0000	2.9536			0.0000			0.0000
Off-Road	5.0165	56.3346	39.1143	0.0694		2.5166	2.5166		2.3153	2.3153		6,874.3163	6,874.3163	2.1750		6,928.6903
Total	**5.0165**	**56.3346**	**39.1143**	**0.0694**	**5.7070**	**2.5166**	**8.2236**	**2.9536**	**2.3153**	**5.2689**		**6,874.3163**	**6,874.3163**	**2.1750**		**6,928.6903**

3.3 Grading - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4519	20.8661	2.0376	0.0411	0.4414	0.0300	0.4714	0.1213	0.0287	0.1500		4,315.4563	4,315.4563	0.5582		4,329.4111
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1310	0.0824	1.0254	1.7900e-003	0.1673	1.0800e-003	0.1684	0.0444	1.0000e-003	0.0454		177.7979	177.7979	8.6300e-003		178.0136
Total	**0.5829**	**20.9485**	**3.0630**	**0.0429**	**0.6087**	**0.0310**	**0.6398**	**0.1657**	**0.0297**	**0.1953**		**4,493.2542**	**4,493.2542**	**0.5668**		**4,507.4247**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.2257	0.0000	2.2257	1.1519	0.0000	1.1519			0.0000			0.0000
Off-Road	5.0165	56.3346	39.1143	0.0694		2.5166	2.5166		2.3153	2.3153	0.0000	6,874.3163	6,874.3163	2.1750		6,928.6903
Total	**5.0165**	**56.3346**	**39.1143**	**0.0694**	**2.2257**	**2.5166**	**4.7424**	**1.1519**	**2.3153**	**3.4672**	**0.0000**	**6,874.3163**	**6,874.3163**	**2.1750**		**6,928.6903**

3.3 Grading - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.4519	20.8661	2.0376	0.0411	0.4414	0.0300	0.4714	0.1213	0.0287	0.1500		4,315.4563	4,315.4563	0.5582		4,329.4111
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1310	0.0824	1.0254	1.7900e-003	0.1673	1.0800e-003	0.1684	0.0444	1.0000e-003	0.0454		177.7979	177.7979	8.6300e-003		178.0136
Total	**0.5829**	**20.9485**	**3.0630**	**0.0429**	**0.6087**	**0.0310**	**0.6398**	**0.1657**	**0.0297**	**0.1953**		**4,493.2542**	**4,493.2542**	**0.5668**		**4,507.4247**

3.4 Paving - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4544	15.2441	14.6648	0.0228		0.8246	0.8246		0.7586	0.7586		2,257.0025	2,257.0025	0.7141		2,274.8548
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5021**	**15.2441**	**14.6648**	**0.0228**		**0.8246**	**0.8246**		**0.7586**	**0.7586**		**2,257.0025**	**2,257.0025**	**0.7141**		**2,274.8548**

3.4 Paving - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0983	0.0618	0.7690	1.3400e-003	0.1255	8.1000e-004	0.1263	0.0333	7.5000e-004	0.0340		133.3484	133.3484	6.4700e-003		133.5102
Total	**0.0983**	**0.0618**	**0.7690**	**1.3400e-003**	**0.1255**	**8.1000e-004**	**0.1263**	**0.0333**	**7.5000e-004**	**0.0340**		**133.3484**	**133.3484**	**6.4700e-003**		**133.5102**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4544	15.2441	14.6648	0.0228		0.8246	0.8246		0.7586	0.7586	0.0000	2,257.0025	2,257.0025	0.7141		2,274.8548
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5021**	**15.2441**	**14.6648**	**0.0228**		**0.8246**	**0.8246**		**0.7586**	**0.7586**	**0.0000**	**2,257.0025**	**2,257.0025**	**0.7141**		**2,274.8548**

3.4 Paving - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0983	0.0618	0.7690	1.3400e-003	0.1255	8.1000e-004	0.1263	0.0333	7.5000e-004	0.0340		133.3484	133.3484	6.4700e-003		133.5102
Total	**0.0983**	**0.0618**	**0.7690**	**1.3400e-003**	**0.1255**	**8.1000e-004**	**0.1263**	**0.0333**	**7.5000e-004**	**0.0340**		**133.3484**	**133.3484**	**6.4700e-003**		**133.5102**

3.4 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3566	14.0656	14.6521	0.0228		0.7528	0.7528		0.6926	0.6926		2,207.7334	2,207.7334	0.7140		2,225.5841
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.4042**	**14.0656**	**14.6521**	**0.0228**		**0.7528**	**0.7528**		**0.6926**	**0.6926**		**2,207.7334**	**2,207.7334**	**0.7140**		**2,225.5841**

3.4 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0907	0.0559	0.7018	1.3000e-003	0.1255	7.9000e-004	0.1263	0.0333	7.3000e-004	0.0340		129.1118	129.1118	5.8400e-003		129.2577
Total	**0.0907**	**0.0559**	**0.7018**	**1.3000e-003**	**0.1255**	**7.9000e-004**	**0.1263**	**0.0333**	**7.3000e-004**	**0.0340**		**129.1118**	**129.1118**	**5.8400e-003**		**129.2577**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3566	14.0656	14.6521	0.0228		0.7528	0.7528		0.6926	0.6926	0.0000	2,207.7334	2,207.7334	0.7140		2,225.5841
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.4042**	**14.0656**	**14.6521**	**0.0228**		**0.7528**	**0.7528**		**0.6926**	**0.6926**	**0.0000**	**2,207.7334**	**2,207.7334**	**0.7140**		**2,225.5841**

3.4 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0907	0.0559	0.7018	1.3000e-003	0.1255	7.9000e-004	0.1263	0.0333	7.3000e-004	0.0340		129.1118	129.1118	5.8400e-003		129.2577
Total	**0.0907**	**0.0559**	**0.7018**	**1.3000e-003**	**0.1255**	**7.9000e-004**	**0.1263**	**0.0333**	**7.3000e-004**	**0.0340**		**129.1118**	**129.1118**	**5.8400e-003**		**129.2577**

3.5 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6314	31.7371	24.7005	0.0411		1.8382	1.8382		1.7432	1.7432		3,921.9017	3,921.9017	0.8636		3,943.4922
Total	**3.6314**	**31.7371**	**24.7005**	**0.0411**		**1.8382**	**1.8382**		**1.7432**	**1.7432**		**3,921.9017**	**3,921.9017**	**0.8636**		**3,943.4922**

3.5 Building Construction - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.6395	18.8684	4.4418	0.0424	0.8990	0.1152	1.0141	0.2590	0.1102	0.3692		4,436.7089	4,436.7089	0.3871		4,446.3868
Worker	2.9738	1.8708	23.2758	0.0407	3.7985	0.0246	3.8231	1.0075	0.0227	1.0302		4,036.0117	4,036.0117	0.1959		4,040.9090
Total	**3.6133**	**20.7392**	**27.7175**	**0.0831**	**4.6975**	**0.1398**	**4.8372**	**1.2665**	**0.1328**	**1.3994**		**8,472.7206**	**8,472.7206**	**0.5830**		**8,487.2958**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6314	31.7371	24.7005	0.0411		1.8382	1.8382		1.7432	1.7432	0.0000	3,921.9017	3,921.9017	0.8636		3,943.4922
Total	**3.6314**	**31.7371**	**24.7005**	**0.0411**		**1.8382**	**1.8382**		**1.7432**	**1.7432**	**0.0000**	**3,921.9017**	**3,921.9017**	**0.8636**		**3,943.4922**

3.5 Building Construction - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.6395	18.8684	4.4418	0.0424	0.8990	0.1152	1.0141	0.2590	0.1102	0.3692		4,436.7089	4,436.7089	0.3871		4,446.3868
Worker	2.9738	1.8708	23.2758	0.0407	3.7985	0.0246	3.8231	1.0075	0.0227	1.0302		4,036.0117	4,036.0117	0.1959		4,040.9090
Total	**3.6133**	**20.7392**	**27.7175**	**0.0831**	**4.6975**	**0.1398**	**4.8372**	**1.2665**	**0.1328**	**1.3994**		**8,472.7206**	**8,472.7206**	**0.5830**		**8,487.2958**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.2577	28.9536	24.1720	0.0411		1.5947	1.5947		1.5124	1.5124		3,872.5163	3,872.5163	0.8467		3,893.6848
Total	**3.2577**	**28.9536**	**24.1720**	**0.0411**		**1.5947**	**1.5947**		**1.5124**	**1.5124**		**3,872.5163**	**3,872.5163**	**0.8467**		**3,893.6848**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.5579	17.3638	3.9732	0.0420	0.8990	0.0813	0.9803	0.2590	0.0778	0.3368		4,400.2394	4,400.2394	0.3585		4,409.2007
Worker	2.7458	1.6905	21.2396	0.0394	3.7985	0.0240	3.8225	1.0075	0.0221	1.0296		3,907.7824	3,907.7824	0.1767		3,912.1991
Total	**3.3037**	**19.0543**	**25.2128**	**0.0814**	**4.6974**	**0.1053**	**4.8028**	**1.2665**	**0.0999**	**1.3664**		**8,308.0218**	**8,308.0218**	**0.5351**		**8,321.3999**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.2577	28.9536	24.1720	0.0411		1.5947	1.5947		1.5124	1.5124	0.0000	3,872.5163	3,872.5163	0.8467		3,893.6848
Total	**3.2577**	**28.9536**	**24.1720**	**0.0411**		**1.5947**	**1.5947**		**1.5124**	**1.5124**	**0.0000**	**3,872.5163**	**3,872.5163**	**0.8467**		**3,893.6848**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.5579	17.3638	3.9732	0.0420	0.8990	0.0813	0.9803	0.2590	0.0778	0.3368		4,400.2394	4,400.2394	0.3585		4,409.2007
Worker	2.7458	1.6905	21.2396	0.0394	3.7985	0.0240	3.8225	1.0075	0.0221	1.0296		3,907.7824	3,907.7824	0.1767		3,912.1991
Total	**3.3037**	**19.0543**	**25.2128**	**0.0814**	**4.6974**	**0.1053**	**4.8028**	**1.2665**	**0.0999**	**1.3664**		**8,308.0218**	**8,308.0218**	**0.5351**		**8,321.3999**

3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9223	26.3503	23.7137	0.0411		1.3727	1.3727		1.3016	1.3016		3,872.7726	3,872.7726	0.8329		3,893.5962
Total	**2.9223**	**26.3503**	**23.7137**	**0.0411**		**1.3727**	**1.3727**		**1.3016**	**1.3016**		**3,872.7726**	**3,872.7726**	**0.8329**		**3,893.5962**

3.5 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4913	15.9443	3.5592	0.0418	0.8989	0.0283	0.9272	0.2590	0.0271	0.2861		4,375.6536	4,375.6536	0.3346		4,384.0190
Worker	2.5518	1.5353	19.6657	0.0380	3.7985	0.0234	3.8219	1.0075	0.0216	1.0291		3,776.3109	3,776.3109	0.1616		3,780.3510
Total	**3.0431**	**17.4795**	**23.2249**	**0.0798**	**4.6974**	**0.0517**	**4.7491**	**1.2665**	**0.0486**	**1.3151**		**8,151.9645**	**8,151.9645**	**0.4962**		**8,164.3700**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9223	26.3503	23.7137	0.0411		1.3727	1.3727		1.3016	1.3016	0.0000	3,872.7726	3,872.7726	0.8329		3,893.5962
Total	**2.9223**	**26.3503**	**23.7137**	**0.0411**		**1.3727**	**1.3727**		**1.3016**	**1.3016**	**0.0000**	**3,872.7726**	**3,872.7726**	**0.8329**		**3,893.5962**

3.5 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4913	15.9443	3.5592	0.0418	0.8989	0.0283	0.9272	0.2590	0.0271	0.2861		4,375.6536	4,375.6536	0.3346		4,384.0190
Worker	2.5518	1.5353	19.6657	0.0380	3.7985	0.0234	3.8219	1.0075	0.0216	1.0291		3,776.3109	3,776.3109	0.1616		3,780.3510
Total	**3.0431**	**17.4795**	**23.2249**	**0.0798**	**4.6974**	**0.0517**	**4.7491**	**1.2665**	**0.0486**	**1.3151**		**8,151.9645**	**8,151.9645**	**0.4962**		**8,164.3700**

3.6 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	59.4597					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	**59.6786**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**		**281.4481**	**281.4481**	**0.0193**		**281.9309**

3.6 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5115	0.3077	3.9418	7.6200e-003	0.7614	4.6900e-003	0.7661	0.2020	4.3200e-003	0.2063		756.9258	756.9258	0.0324		757.7356
Total	**0.5115**	**0.3077**	**3.9418**	**7.6200e-003**	**0.7614**	**4.6900e-003**	**0.7661**	**0.2020**	**4.3200e-003**	**0.2063**		**756.9258**	**756.9258**	**0.0324**		**757.7356**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	59.4597					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309
Total	**59.6786**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**	**0.0000**	**281.4481**	**281.4481**	**0.0193**		**281.9309**

3.6 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5115	0.3077	3.9418	7.6200e-003	0.7614	4.6900e-003	0.7661	0.2020	4.3200e-003	0.2063		756.9258	756.9258	0.0324		757.7356
Total	**0.5115**	**0.3077**	**3.9418**	**7.6200e-003**	**0.7614**	**4.6900e-003**	**0.7661**	**0.2020**	**4.3200e-003**	**0.2063**		**756.9258**	**756.9258**	**0.0324**		**757.7356**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	14.8306	107.9586	141.9591	0.4792	26.2804	0.3143	26.5947	7.0531	0.2960	7.3491		49,065.9757	49,065.9757	3.5120		49,153.7766
Unmitigated	14.8306	107.9586	141.9591	0.4792	26.2804	0.3143	26.5947	7.0531	0.2960	7.3491		49,065.9757	49,065.9757	3.5120		49,153.7766

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Enclosed Parking with Elevator	0.00	0.00	0.00		
High Turnover (Sit Down Restaurant)	631.91	631.91	631.91	505,822	505,822
Hotel	3,661.68	3,661.68	3661.68	8,788,137	8,788,137
Other Asphalt Surfaces	0.00	0.00	0.00		
Recreational Swimming Pool	1,123.85	1,123.85	1123.85	2,754,828	2,754,828
Regional Shopping Center	75.60	75.60	75.60	164,431	164,431
Total	5,493.04	5,493.04	5,493.04	12,213,217	12,213,217

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Enclosed Parking with Elevator	12.50	4.20	5.40	0.00	0.00	0.00	0	0	0
High Turnover (Sit Down	12.50	4.20	5.40	8.50	72.50	19.00	37	20	43
Hotel	12.50	4.20	25.00	19.40	61.60	19.00	58	38	4
Other Asphalt Surfaces	12.50	4.20	5.40	0.00	0.00	0.00	0	0	0
Recreational Swimming Pool	12.50	4.20	25.00	33.00	48.00	19.00	52	39	9
Regional Shopping Center	12.50	4.20	25.00	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Enclosed Parking with Elevator	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
High Turnover (Sit Down Restaurant)	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Hotel	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Other Asphalt Surfaces	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Recreational Swimming Pool	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Regional Shopping Center	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105
NaturalGas Unmitigated	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	8427.95	0.0909	0.8263	0.6941	4.9600e-003		0.0628	0.0628		0.0628	0.0628		991.5230	991.5230	0.0190	0.0182	997.4151
Hotel	82205.5	0.8865	8.0594	6.7699	0.0484		0.6125	0.6125		0.6125	0.6125		9,671.2329	9,671.2329	0.1854	0.1773	9,728.7042
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	273.699	2.9500e-003	0.0268	0.0225	1.6000e-004		2.0400e-003	2.0400e-003		2.0400e-003	2.0400e-003		32.1998	32.1998	6.2000e-004	5.9000e-004	32.3912
Total		**0.9804**	**8.9125**	**7.4865**	**0.0535**		**0.6774**	**0.6774**		**0.6774**	**0.6774**		**10,694.9557**	**10,694.9557**	**0.2050**	**0.1961**	**10,758.5105**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	8.42795	0.0909	0.8263	0.6941	4.9600e-003		0.0628	0.0628		0.0628	0.0628		991.5230	991.5230	0.0190	0.0182	997.4151
Hotel	82.2055	0.8865	8.0594	6.7699	0.0484		0.6125	0.6125		0.6125	0.6125		9,671.2329	9,671.2329	0.1854	0.1773	9,728.7042
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	0.273699	2.9500e-003	0.0268	0.0225	1.6000e-004		2.0400e-003	2.0400e-003		2.0400e-003	2.0400e-003		32.1998	32.1998	6.2000e-004	5.9000e-004	32.3912
Total		**0.9804**	**8.9125**	**7.4865**	**0.0535**		**0.6774**	**0.6774**		**0.6774**	**0.6774**		**10,694.9557**	**10,694.9557**	**0.2050**	**0.1961**	**10,758.5105**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Unmitigated	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.1503					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.0006					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0122	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Total	**14.1631**	**1.2000e-003**	**0.1309**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**		**0.2795**	**0.2795**	**7.4000e-004**		**0.2981**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.1503					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.0006					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0122	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Total	**14.1631**	**1.2000e-003**	**0.1309**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**		**0.2795**	**0.2795**	**7.4000e-004**		**0.2981**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

DSRT SURF Proposed Project SP Buildout

Salton Sea Air Basin, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	520.00	Space	3.51	208,000.00	0
Other Asphalt Surfaces	1.50	Acre	1.00	65,340.00	0
High Turnover (Sit Down Restaurant)	11.25	1000sqft	0.26	11,250.00	0
Hotel	438.00	Room	6.00	500,000.00	0
Recreational Swimming Pool	261.36	1000sqft	6.00	261,360.00	0
Regional Shopping Center	45.00	1000sqft	1.03	45,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	3.4	**Precipitation Freq (Days)**	20
Climate Zone	15			**Operational Year**	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Assumptions made due to SP level information. See AQ/GHG report for assumption breakdown.

Construction Phase - Assumes a 2-year buildout

Off-road Equipment - Number of equipment increased.

Off-road Equipment - Added material handling equipment for export. Hours reduced from 8 to 7 per day to account for worker breaks, refueling, maintenance etc.

Trips and VMT - Worse case scenario haul trip is 3.25 miles north to the Classic Club material dumping site.

On-road Fugitive Dust - All roads in project area are paced.

Grading - Excavation for the lagoon will require approx. 103,000 CY of export.

Architectural Coating - Use of low VOC coatings per SCAQMD Rule 1113

Vehicle Trips - Per Traffic Report, total project daily trips = 5496. Assumes some visitors may be coming from greater distances, 25 miles average per trip assumed.

Road Dust - All roads paved.

Energy Use - All electricity will be Title 24 approved. Lagoon wave machine and lighting assumptions accounted for in "Regional Shopping Center."

Construction Off-road Equipment Mitigation - Standard requirements per SCAQMD Rule 403.1 Dust Control.

Off-road Equipment - Hours per day reduced to account for worker breaks, refueling, maintenance etc.

Off-road Equipment -

Off-road Equipment - Hours per day reduced from 8 to 7 to account for worker breaks, refueling, maintenance etc.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	150.00	125.00
tblArchitecturalCoating	EF_Nonresidential_Interior	150.00	125.00
tblArchitecturalCoating	EF_Parking	150.00	125.00
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.5
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	40
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final

tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
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tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstEquipMitigation	Tier	No Change	Tier 4 Final
tblConstructionPhase	NumDays	20.00	110.00
tblConstructionPhase	NumDays	300.00	350.00
tblConstructionPhase	NumDays	30.00	90.00
tblConstructionPhase	NumDays	20.00	55.00
tblConstructionPhase	NumDays	10.00	20.00
tblEnergyUse	NT24E	0.19	0.00
tblEnergyUse	NT24E	28.48	0.00
tblEnergyUse	NT24E	6.23	0.00
tblEnergyUse	NT24E	2.44	0.00
tblEnergyUse	T24E	3.92	4.00
tblEnergyUse	T24E	12.38	41.00
tblEnergyUse	T24E	6.47	13.00
tblEnergyUse	T24E	4.58	233.50
tblGrading	AcresOfGrading	196.88	17.80
tblGrading	MaterialExported	0.00	103,000.00
tblLandUse	LandUseSquareFeet	635,976.00	500,000.00

tblLandUse	LotAcreage	4.68	3.51
tblLandUse	LotAcreage	1.50	1.00
tblLandUse	LotAcreage	14.60	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	HaulingPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	VendorPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblOnRoadDust	WorkerPercentPave	50.00	100.00
tblRoadDust	RoadPercentPave	50	100

tblTripsAndVMT	HaulingTripLength	20.00	3.50
tblTripsAndVMT	WorkerTripNumber	28.00	20.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	CNW_TL	5.40	25.00
tblVehicleTrips	ST_TR	158.37	56.17
tblVehicleTrips	ST_TR	8.19	8.36
tblVehicleTrips	ST_TR	9.10	4.30
tblVehicleTrips	ST_TR	49.97	1.68
tblVehicleTrips	SU_TR	131.84	56.17
tblVehicleTrips	SU_TR	5.95	8.36
tblVehicleTrips	SU_TR	13.60	4.30
tblVehicleTrips	SU_TR	25.24	1.68
tblVehicleTrips	WD_TR	127.15	56.17
tblVehicleTrips	WD_TR	8.17	8.36
tblVehicleTrips	WD_TR	33.82	4.30
tblVehicleTrips	WD_TR	42.70	1.68

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	8.3262	92.0677	61.8689	0.1394	18.2169	3.3757	20.6082	9.9706	3.1069	12.1707	0.0000	13,896.2979	13,896.2979	3.5321	0.0000	13,950.5889
2020	7.5859	62.1126	59.2582	0.1379	4.8229	2.4552	7.2782	1.2998	2.3072	3.6070	0.0000	13,651.0122	13,651.0122	2.1077	0.0000	13,703.7035
2021	65.6539	45.5875	46.6480	0.1221	5.4588	1.5246	6.9834	1.4685	1.4500	2.9184	0.0000	12,118.5300	12,118.5300	1.3824	0.0000	12,153.0890
Maximum	**65.6539**	**92.0677**	**61.8689**	**0.1394**	**18.2169**	**3.3757**	**20.6082**	**9.9706**	**3.1069**	**12.1707**	**0.0000**	**13,896.2979**	**13,896.2979**	**3.5321**	**0.0000**	**13,950.5889**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	8.3262	92.0677	61.8689	0.1394	7.1964	3.3757	9.5878	3.9129	3.1069	6.1129	0.0000	13,896.2979	13,896.2979	3.5321	0.0000	13,950.5889
2020	7.5859	62.1126	59.2582	0.1379	4.8229	2.4552	7.2782	1.2998	2.3072	3.6070	0.0000	13,651.0122	13,651.0122	2.1077	0.0000	13,703.7035
2021	65.6539	45.5875	46.6480	0.1221	5.4588	1.5246	6.9834	1.4685	1.4500	2.9184	0.0000	12,118.5300	12,118.5300	1.3824	0.0000	12,153.0890
Maximum	**65.6539**	**92.0677**	**61.8689**	**0.1394**	**7.1964**	**3.3757**	**9.5878**	**3.9129**	**3.1069**	**6.1129**	**0.0000**	**13,896.2979**	**13,896.2979**	**3.5321**	**0.0000**	**13,950.5889**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**38.67**	**0.00**	**31.60**	**47.55**	**0.00**	**32.40**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Energy	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105
Mobile	10.8656	107.3398	116.3483	0.4291	26.2804	0.3226	26.6030	7.0531	0.3040	7.3571		44,016.5204	44,016.5204	3.6281		44,107.2229
Total	**26.0091**	**116.2535**	**123.9656**	**0.4825**	**26.2804**	**1.0004**	**27.2808**	**7.0531**	**0.9818**	**8.0349**		**54,711.7555**	**54,711.7555**	**3.8338**	**0.1961**	**54,866.0314**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Energy	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105
Mobile	10.8656	107.3398	116.3483	0.4291	26.2804	0.3226	26.6030	7.0531	0.3040	7.3571		44,016.5204	44,016.5204	3.6281		44,107.2229
Total	**26.0091**	**116.2535**	**123.9656**	**0.4825**	**26.2804**	**1.0004**	**27.2808**	**7.0531**	**0.9818**	**8.0349**		**54,711.7555**	**54,711.7555**	**3.8338**	**0.1961**	**54,866.0314**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/3/2019	6/28/2019	5	20	
2	Grading	Grading	6/29/2019	11/1/2019	5	90	
3	Paving	Paving	11/1/2019	1/16/2020	5	55	
4	Building Construction	Building Construction	11/2/2019	3/5/2021	5	350	
5	Architectural Coating	Architectural Coating	1/1/2021	6/3/2021	5	110	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 17.8

Acres of Paving: 4.51

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 834,375; Non-Residential Outdoor: 278,125; Striped Parking Area: 16,400 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	7.00	158	0.38
Grading	Graders	1	7.00	187	0.41
Grading	Other Material Handling Equipment	3	7.00	168	0.40
Grading	Rubber Tired Dozers	1	7.00	247	0.40
Grading	Scrapers	2	7.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Building Construction	Cranes	2	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	2	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	2	8.00	46	0.45
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Grading	11	20.00	0.00	12,875.00	11.00	5.40	3.50	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	12	454.00	179.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	91.00	0.00	0.00	11.00	5.40	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use Soil Stabilizer

Water Exposed Area

3.2 Site Preparation - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	4.3350	45.5727	22.0630	0.0380		2.3904	2.3904		2.1991	2.1991		3,766.4529	3,766.4529	1.1917		3,796.2445
Total	**4.3350**	**45.5727**	**22.0630**	**0.0380**	**18.0663**	**2.3904**	**20.4566**	**9.9307**	**2.1991**	**12.1298**		**3,766.4529**	**3,766.4529**	**1.1917**		**3,796.2445**

3.2 Site Preparation - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0968	0.0765	0.6624	1.3500e-003	0.1506	9.8000e-004	0.1516	0.0400	9.0000e-004	0.0408		134.4593	134.4593	6.1400e-003		134.6128
Total	**0.0968**	**0.0765**	**0.6624**	**1.3500e-003**	**0.1506**	**9.8000e-004**	**0.1516**	**0.0400**	**9.0000e-004**	**0.0408**		**134.4593**	**134.4593**	**6.1400e-003**		**134.6128**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.0458	0.0000	7.0458	3.8730	0.0000	3.8730			0.0000			0.0000
Off-Road	4.3350	45.5727	22.0630	0.0380		2.3904	2.3904		2.1991	2.1991	0.0000	3,766.4529	3,766.4529	1.1917		3,796.2445
Total	**4.3350**	**45.5727**	**22.0630**	**0.0380**	**7.0458**	**2.3904**	**9.4362**	**3.8730**	**2.1991**	**6.0721**	**0.0000**	**3,766.4529**	**3,766.4529**	**1.1917**		**3,796.2445**

3.2 Site Preparation - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0968	0.0765	0.6624	1.3500e-003	0.1506	9.8000e-004	0.1516	0.0400	9.0000e-004	0.0408		134.4593	134.4593	6.1400e-003		134.6128
Total	**0.0968**	**0.0765**	**0.6624**	**1.3500e-003**	**0.1506**	**9.8000e-004**	**0.1516**	**0.0400**	**9.0000e-004**	**0.0408**		**134.4593**	**134.4593**	**6.1400e-003**		**134.6128**

3.3 Grading - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.7070	0.0000	5.7070	2.9536	0.0000	2.9536			0.0000			0.0000
Off-Road	5.0165	56.3346	39.1143	0.0694		2.5166	2.5166		2.3153	2.3153		6,874.3163	6,874.3163	2.1750		6,928.6903
Total	**5.0165**	**56.3346**	**39.1143**	**0.0694**	**5.7070**	**2.5166**	**8.2236**	**2.9536**	**2.3153**	**5.2689**		**6,874.3163**	**6,874.3163**	**2.1750**		**6,928.6903**

3.3 Grading - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.5014	20.3402	2.9708	0.0378	0.4414	0.0326	0.4740	0.1213	0.0312	0.1525		3,965.7525	3,965.7525	0.6311		3,981.5306
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1076	0.0851	0.7361	1.5000e-003	0.1673	1.0800e-003	0.1684	0.0444	1.0000e-003	0.0454		149.3992	149.3992	6.8200e-003		149.5697
Total	**0.6090**	**20.4253**	**3.7068**	**0.0393**	**0.6087**	**0.0337**	**0.6424**	**0.1657**	**0.0322**	**0.1979**		**4,115.1517**	**4,115.1517**	**0.6380**		**4,131.1004**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.2257	0.0000	2.2257	1.1519	0.0000	1.1519			0.0000			0.0000
Off-Road	5.0165	56.3346	39.1143	0.0694		2.5166	2.5166		2.3153	2.3153	0.0000	6,874.3163	6,874.3163	2.1750		6,928.6903
Total	**5.0165**	**56.3346**	**39.1143**	**0.0694**	**2.2257**	**2.5166**	**4.7424**	**1.1519**	**2.3153**	**3.4672**	**0.0000**	**6,874.3163**	**6,874.3163**	**2.1750**		**6,928.6903**

3.3 Grading - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.5014	20.3402	2.9708	0.0378	0.4414	0.0326	0.4740	0.1213	0.0312	0.1525		3,965.7525	3,965.7525	0.6311		3,981.5306
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1076	0.0851	0.7361	1.5000e-003	0.1673	1.0800e-003	0.1684	0.0444	1.0000e-003	0.0454		149.3992	149.3992	6.8200e-003		149.5697
Total	**0.6090**	**20.4253**	**3.7068**	**0.0393**	**0.6087**	**0.0337**	**0.6424**	**0.1657**	**0.0322**	**0.1979**		**4,115.1517**	**4,115.1517**	**0.6380**		**4,131.1004**

3.4 Paving - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4544	15.2441	14.6648	0.0228		0.8246	0.8246		0.7586	0.7586		2,257.0025	2,257.0025	0.7141		2,274.8548
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5021**	**15.2441**	**14.6648**	**0.0228**		**0.8246**	**0.8246**		**0.7586**	**0.7586**		**2,257.0025**	**2,257.0025**	**0.7141**		**2,274.8548**

3.4 Paving - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0807	0.0638	0.5520	1.1300e-003	0.1255	8.1000e-004	0.1263	0.0333	7.5000e-004	0.0340		112.0494	112.0494	5.1200e-003		112.1773
Total	**0.0807**	**0.0638**	**0.5520**	**1.1300e-003**	**0.1255**	**8.1000e-004**	**0.1263**	**0.0333**	**7.5000e-004**	**0.0340**		**112.0494**	**112.0494**	**5.1200e-003**		**112.1773**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.4544	15.2441	14.6648	0.0228		0.8246	0.8246		0.7586	0.7586	0.0000	2,257.0025	2,257.0025	0.7141		2,274.8548
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5021**	**15.2441**	**14.6648**	**0.0228**		**0.8246**	**0.8246**		**0.7586**	**0.7586**	**0.0000**	**2,257.0025**	**2,257.0025**	**0.7141**		**2,274.8548**

3.4 Paving - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0807	0.0638	0.5520	1.1300e-003	0.1255	8.1000e-004	0.1263	0.0333	7.5000e-004	0.0340		112.0494	112.0494	5.1200e-003		112.1773
Total	**0.0807**	**0.0638**	**0.5520**	**1.1300e-003**	**0.1255**	**8.1000e-004**	**0.1263**	**0.0333**	**7.5000e-004**	**0.0340**		**112.0494**	**112.0494**	**5.1200e-003**		**112.1773**

3.4 Paving - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3566	14.0656	14.6521	0.0228		0.7528	0.7528		0.6926	0.6926		2,207.7334	2,207.7334	0.7140		2,225.5841
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.4042**	**14.0656**	**14.6521**	**0.0228**		**0.7528**	**0.7528**		**0.6926**	**0.6926**		**2,207.7334**	**2,207.7334**	**0.7140**		**2,225.5841**

3.4 Paving - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0747	0.0576	0.5025	1.0900e-003	0.1255	7.9000e-004	0.1263	0.0333	7.3000e-004	0.0340		108.4854	108.4854	4.6100e-003		108.6008
Total	**0.0747**	**0.0576**	**0.5025**	**1.0900e-003**	**0.1255**	**7.9000e-004**	**0.1263**	**0.0333**	**7.3000e-004**	**0.0340**		**108.4854**	**108.4854**	**4.6100e-003**		**108.6008**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3566	14.0656	14.6521	0.0228		0.7528	0.7528		0.6926	0.6926	0.0000	2,207.7334	2,207.7334	0.7140		2,225.5841
Paving	0.0476					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.4042**	**14.0656**	**14.6521**	**0.0228**		**0.7528**	**0.7528**		**0.6926**	**0.6926**	**0.0000**	**2,207.7334**	**2,207.7334**	**0.7140**		**2,225.5841**

3.4 Paving - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0747	0.0576	0.5025	1.0900e-003	0.1255	7.9000e-004	0.1263	0.0333	7.3000e-004	0.0340		108.4854	108.4854	4.6100e-003		108.6008
Total	**0.0747**	**0.0576**	**0.5025**	**1.0900e-003**	**0.1255**	**7.9000e-004**	**0.1263**	**0.0333**	**7.3000e-004**	**0.0340**		**108.4854**	**108.4854**	**4.6100e-003**		**108.6008**

3.5 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6314	31.7371	24.7005	0.0411		1.8382	1.8382		1.7432	1.7432		3,921.9017	3,921.9017	0.8636		3,943.4922
Total	**3.6314**	**31.7371**	**24.7005**	**0.0411**		**1.8382**	**1.8382**		**1.7432**	**1.7432**		**3,921.9017**	**3,921.9017**	**0.8636**		**3,943.4922**

3.5 Building Construction - 2019

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.6705	18.8638	5.2433	0.0403	0.8990	0.1173	1.0163	0.2590	0.1122	0.3712		4,213.9815	4,213.9815	0.4340		4,224.8314
Worker	2.4417	1.9305	16.7083	0.0341	3.7985	0.0246	3.8231	1.0075	0.0227	1.0302		3,391.3627	3,391.3627	0.1548		3,395.2332
Total	**3.1121**	**20.7944**	**21.9516**	**0.0744**	**4.6975**	**0.1419**	**4.8394**	**1.2665**	**0.1349**	**1.4014**		**7,605.3443**	**7,605.3443**	**0.5888**		**7,620.0647**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.6314	31.7371	24.7005	0.0411		1.8382	1.8382		1.7432	1.7432	0.0000	3,921.9017	3,921.9017	0.8636		3,943.4922
Total	**3.6314**	**31.7371**	**24.7005**	**0.0411**		**1.8382**	**1.8382**		**1.7432**	**1.7432**	**0.0000**	**3,921.9017**	**3,921.9017**	**0.8636**		**3,943.4922**

3.5 Building Construction - 2019

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.6705	18.8638	5.2433	0.0403	0.8990	0.1173	1.0163	0.2590	0.1122	0.3712		4,213.9815	4,213.9815	0.4340		4,224.8314
Worker	2.4417	1.9305	16.7083	0.0341	3.7985	0.0246	3.8231	1.0075	0.0227	1.0302		3,391.3627	3,391.3627	0.1548		3,395.2332
Total	**3.1121**	**20.7944**	**21.9516**	**0.0744**	**4.6975**	**0.1419**	**4.8394**	**1.2665**	**0.1349**	**1.4014**		**7,605.3443**	**7,605.3443**	**0.5888**		**7,620.0647**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.2577	28.9536	24.1720	0.0411		1.5947	1.5947		1.5124	1.5124		3,872.5163	3,872.5163	0.8467		3,893.6848
Total	**3.2577**	**28.9536**	**24.1720**	**0.0411**		**1.5947**	**1.5947**		**1.5124**	**1.5124**		**3,872.5163**	**3,872.5163**	**0.8467**		**3,893.6848**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.5871	17.2934	4.7227	0.0399	0.8990	0.0830	0.9819	0.2590	0.0794	0.3384		4,178.7854	4,178.7854	0.4026		4,188.8505
Worker	2.2621	1.7425	15.2089	0.0330	3.7985	0.0240	3.8225	1.0075	0.0221	1.0296		3,283.4917	3,283.4917	0.1397		3,286.9834
Total	**2.8492**	**19.0359**	**19.9316**	**0.0730**	**4.6974**	**0.1070**	**4.8044**	**1.2665**	**0.1015**	**1.3680**		**7,462.2771**	**7,462.2771**	**0.5423**		**7,475.8339**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.2577	28.9536	24.1720	0.0411		1.5947	1.5947		1.5124	1.5124	0.0000	3,872.5163	3,872.5163	0.8467		3,893.6848
Total	**3.2577**	**28.9536**	**24.1720**	**0.0411**		**1.5947**	**1.5947**		**1.5124**	**1.5124**	**0.0000**	**3,872.5163**	**3,872.5163**	**0.8467**		**3,893.6848**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.5871	17.2934	4.7227	0.0399	0.8990	0.0830	0.9819	0.2590	0.0794	0.3384		4,178.7854	4,178.7854	0.4026		4,188.8505
Worker	2.2621	1.7425	15.2089	0.0330	3.7985	0.0240	3.8225	1.0075	0.0221	1.0296		3,283.4917	3,283.4917	0.1397		3,286.9834
Total	**2.8492**	**19.0359**	**19.9316**	**0.0730**	**4.6974**	**0.1070**	**4.8044**	**1.2665**	**0.1015**	**1.3680**		**7,462.2771**	**7,462.2771**	**0.5423**		**7,475.8339**

3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9223	26.3503	23.7137	0.0411		1.3727	1.3727		1.3016	1.3016		3,872.7726	3,872.7726	0.8329		3,893.5962
Total	**2.9223**	**26.3503**	**23.7137**	**0.0411**		**1.3727**	**1.3727**		**1.3016**	**1.3016**		**3,872.7726**	**3,872.7726**	**0.8329**		**3,893.5962**

3.5 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.5194	15.8126	4.2670	0.0397	0.8989	0.0297	0.9286	0.2590	0.0284	0.2874		4,155.2562	4,155.2562	0.3765		4,164.6691
Worker	2.1106	1.5809	14.0364	0.0319	3.7985	0.0234	3.8219	1.0075	0.0216	1.0291		3,173.0461	3,173.0461	0.1279		3,176.2447
Total	**2.6300**	**17.3935**	**18.3033**	**0.0716**	**4.6974**	**0.0531**	**4.7505**	**1.2665**	**0.0499**	**1.3164**		**7,328.3023**	**7,328.3023**	**0.5045**		**7,340.9138**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9223	26.3503	23.7137	0.0411		1.3727	1.3727		1.3016	1.3016	0.0000	3,872.7726	3,872.7726	0.8329		3,893.5962
Total	**2.9223**	**26.3503**	**23.7137**	**0.0411**		**1.3727**	**1.3727**		**1.3016**	**1.3016**	**0.0000**	**3,872.7726**	**3,872.7726**	**0.8329**		**3,893.5962**

3.5 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.5194	15.8126	4.2670	0.0397	0.8989	0.0297	0.9286	0.2590	0.0284	0.2874		4,155.2562	4,155.2562	0.3765		4,164.6691
Worker	2.1106	1.5809	14.0364	0.0319	3.7985	0.0234	3.8219	1.0075	0.0216	1.0291		3,173.0461	3,173.0461	0.1279		3,176.2447
Total	**2.6300**	**17.3935**	**18.3033**	**0.0716**	**4.6974**	**0.0531**	**4.7505**	**1.2665**	**0.0499**	**1.3164**		**7,328.3023**	**7,328.3023**	**0.5045**		**7,340.9138**

3.6 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	59.4597					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	**59.6786**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**		**281.4481**	**281.4481**	**0.0193**		**281.9309**

3.6 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4231	0.3169	2.8135	6.3900e-003	0.7614	4.6900e-003	0.7661	0.2020	4.3200e-003	0.2063		636.0070	636.0070	0.0256		636.6482
Total	**0.4231**	**0.3169**	**2.8135**	**6.3900e-003**	**0.7614**	**4.6900e-003**	**0.7661**	**0.2020**	**4.3200e-003**	**0.2063**		**636.0070**	**636.0070**	**0.0256**		**636.6482**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	59.4597					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309
Total	**59.6786**	**1.5268**	**1.8176**	**2.9700e-003**		**0.0941**	**0.0941**		**0.0941**	**0.0941**	**0.0000**	**281.4481**	**281.4481**	**0.0193**		**281.9309**

3.6 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4231	0.3169	2.8135	6.3900e-003	0.7614	4.6900e-003	0.7661	0.2020	4.3200e-003	0.2063		636.0070	636.0070	0.0256		636.6482
Total	**0.4231**	**0.3169**	**2.8135**	**6.3900e-003**	**0.7614**	**4.6900e-003**	**0.7661**	**0.2020**	**4.3200e-003**	**0.2063**		**636.0070**	**636.0070**	**0.0256**		**636.6482**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	10.8656	107.3398	116.3483	0.4291	26.2804	0.3226	26.6030	7.0531	0.3040	7.3571		44,016.5204	44,016.5204	3.6281		44,107.2229
Unmitigated	10.8656	107.3398	116.3483	0.4291	26.2804	0.3226	26.6030	7.0531	0.3040	7.3571		44,016.5204	44,016.5204	3.6281		44,107.2229

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Enclosed Parking with Elevator	0.00	0.00	0.00		
High Turnover (Sit Down Restaurant)	631.91	631.91	631.91	505,822	505,822
Hotel	3,661.68	3,661.68	3661.68	8,788,137	8,788,137
Other Asphalt Surfaces	0.00	0.00	0.00		
Recreational Swimming Pool	1,123.85	1,123.85	1123.85	2,754,828	2,754,828
Regional Shopping Center	75.60	75.60	75.60	164,431	164,431
Total	5,493.04	5,493.04	5,493.04	12,213,217	12,213,217

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Enclosed Parking with Elevator	12.50	4.20	5.40	0.00	0.00	0.00	0	0	0
High Turnover (Sit Down	12.50	4.20	5.40	8.50	72.50	19.00	37	20	43
Hotel	12.50	4.20	25.00	19.40	61.60	19.00	58	38	4
Other Asphalt Surfaces	12.50	4.20	5.40	0.00	0.00	0.00	0	0	0
Recreational Swimming Pool	12.50	4.20	25.00	33.00	48.00	19.00	52	39	9
Regional Shopping Center	12.50	4.20	25.00	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Enclosed Parking with Elevator	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
High Turnover (Sit Down Restaurant)	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Hotel	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Other Asphalt Surfaces	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Recreational Swimming Pool	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871
Regional Shopping Center	0.488026	0.036684	0.182870	0.124813	0.016056	0.005387	0.022140	0.111418	0.002892	0.001913	0.006145	0.000785	0.000871

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105
NaturalGas Unmitigated	0.9804	8.9125	7.4865	0.0535		0.6774	0.6774		0.6774	0.6774		10,694.9557	10,694.9557	0.2050	0.1961	10,758.5105

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	8427.95	0.0909	0.8263	0.6941	4.9600e-003		0.0628	0.0628		0.0628	0.0628		991.5230	991.5230	0.0190	0.0182	997.4151
Hotel	82205.5	0.8865	8.0594	6.7699	0.0484		0.6125	0.6125		0.6125	0.6125		9,671.2329	9,671.2329	0.1854	0.1773	9,728.7042
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	273.699	2.9500e-003	0.0268	0.0225	1.6000e-004		2.0400e-003	2.0400e-003		2.0400e-003	2.0400e-003		32.1998	32.1998	6.2000e-004	5.9000e-004	32.3912
Total		**0.9804**	**8.9125**	**7.4865**	**0.0535**		**0.6774**	**0.6774**		**0.6774**	**0.6774**		**10,694.9557**	**10,694.9557**	**0.2050**	**0.1961**	**10,758.5105**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day											lb/day				
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	8.42795	0.0909	0.8263	0.6941	4.9600e-003		0.0628	0.0628		0.0628	0.0628		991.5230	991.5230	0.0190	0.0182	997.4151
Hotel	82.2055	0.8865	8.0594	6.7699	0.0484		0.6125	0.6125		0.6125	0.6125		9,671.2329	9,671.2329	0.1854	0.1773	9,728.7042
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Recreational Swimming Pool	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Regional Shopping Center	0.273699	2.9500e-003	0.0268	0.0225	1.6000e-004		2.0400e-003	2.0400e-003		2.0400e-003	2.0400e-003		32.1998	32.1998	6.2000e-004	5.9000e-004	32.3912
Total		**0.9804**	**8.9125**	**7.4865**	**0.0535**		**0.6774**	**0.6774**		**0.6774**	**0.6774**		**10,694.9557**	**10,694.9557**	**0.2050**	**0.1961**	**10,758.5105**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day											lb/day				
Mitigated	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Unmitigated	14.1631	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day											lb/day				
Architectural Coating	2.1503					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.0006					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0122	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Total	**14.1631**	**1.2000e-003**	**0.1309**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**		**0.2795**	**0.2795**	**7.4000e-004**		**0.2981**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.1503					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	12.0006					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0122	1.2000e-003	0.1309	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004		0.2795	0.2795	7.4000e-004		0.2981
Total	**14.1631**	**1.2000e-003**	**0.1309**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**		**0.2795**	**0.2795**	**7.4000e-004**		**0.2981**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation