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July 23, 2024

RE: Revised Air Quality and Greenhouse Gas Emissions Section of Initial Study for CUP 2024-02 for 2218 & 2250 W. Main Street, Stanislaus County APN 044-007-024 and 044-007-040

On June 24, the City of Turlock Planning Division ran the California Emissions Estimator Model (CalEEMod) for CUP 2024-02 at 2218 and 2250 W. Main Street. The Conditional Use Permit is a request to develop two properties totaling approximately 7-acres, with a 2-story 23,723 square foot banquet hall/event center, 5-story 120-room hotel, and a 4,040 square foot commercial building.

The construction and operational emissions exceeded the San Joaquin Valley Air Pollution Control District's (SJVAPDC) thresholds; however, the project was below the SJVAPCD Small Project Level Analysis Levels (SPAL) thresholds. Therefore, the City determined, with mitigation identified in the Initial Study and Westside Industrial Specific Plan EIR, the project was not expected to exceed the thresholds of significance for criteria pollutants. The Notice of Intent to Adopt a Mitigated Negative Declaration was filed with the Office of Planning and Research on June 26, 2024 and with the Stanislaus County Clerk on June 27, 2024. The June 24, 2024 CalEEMod Detailed construction and operational reports are shown below and in Attachment 1 of this memo.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un. Mit.	TCG	RCG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	14BCO2	CO2T	CH4	14CH4	R	CO2e
Daily, Summer (Max)																		
Unmit.	5.93	5.35	280	63.9	0.13	1.17	19.8	21.0	1.08	10.1	11.2	—	25,345	25,345	0.45	2.08	37.9	26,015
Mit.	29.8	29.8	280	63.9	0.13	1.17	14.7	15.1	1.08	3.97	5.05	—	25,345	25,345	0.45	2.08	37.9	26,015
% Reduced	-402%	-456%	—	—	—	—	26%	28%	—	61%	55%	—	—	—	—	—	—	—
Daily, Winter (Max)																		
Unmit.	5.52	4.91	280	53.5	0.13	1.17	19.8	21.0	1.08	10.1	11.2	—	24,313	24,313	0.51	2.41	0.99	25,045
Mit.	29.8	29.8	280	53.5	0.13	1.17	14.7	15.1	1.08	3.97	5.05	—	24,313	24,313	0.51	2.41	0.99	25,045
% Reduced	-439%	-506%	—	—	—	—	26%	28%	—	61%	55%	—	—	—	—	—	—	—
Average Daily (Max)																		
Unmit.	3.79	3.43	19.0	37.7	0.10	0.76	11.8	12.6	0.72	5.81	6.53	—	17,167	17,167	0.34	1.41	10.1	17,606
Mit.	21.3	21.3	19.0	37.7	0.10	0.76	10.3	10.5	0.72	2.54	3.00	—	17,167	17,167	0.34	1.41	10.1	17,606
% Reduced	-462%	-520%	—	—	—	—	13%	17%	—	56%	54%	—	—	—	—	—	—	—
Annual (Max)																		
Unmit.	0.69	0.63	3.47	669	0.02	0.14	216	230	0.13	1.06	11.9	—	2842	2842	0.06	0.23	167	2,915
Mit.	3.88	3.88	3.47	669	0.02	0.14	188	192	0.13	0.46	0.55	—	2,842	2,842	0.06	0.23	1,637	2,915

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Unmit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)																		
Unmit.	957	904	644	5,735	11.6	11.4	972	884	10.7	248	258	2,975	1,253,657	1,256,632	377	95.7	4,637	1,299,229
Mit.	943	890	639	5,688	11.5	11.3	964	975	10.7	246	256	2,975	1,243,683	1,246,658	377	95.2	4,600	1,289,062
% Reduced	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	—	1%	1%	< 0.5%	1%	1%	1%
Daily, Winter (Max)																		
Unmit.	844	790	736	4,833	10.7	11.1	972	983	10.5	248	258	2,975	1,161,864	1,164,839	386	100	410	1,204,794
Mit.	831	777	730	4,792	10.6	11.0	964	975	10.4	246	256	2,975	1,152,663	1,155,638	385	99.8	409	1,195,423
% Reduced	2%	2%	1%	1%	1%	1%	1%	1%	1%	1%	1%	—	1%	1%	< 0.5%	1%	< 0.5%	1%
Average Daily (Max)																		
Unmit.	802	753	636	4,491	9.97	10.4	872	882	9.79	222	232	2,975	1,089,894	1,092,869	377	92.9	2,010	1,131,992
Mit.	789	741	631	4,453	9.88	10.3	865	875	9.71	220	230	2,975	1,081,308	1,084,283	376	92.5	1,985	1,123,242
% Reduced	2%	2%	1%	1%	1%	1%	1%	1%	1%	1%	1%	—	1%	1%	< 0.5%	< 0.5%	1%	1%

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On July 16, 2024, staff received a phone call from the SJVAPCD expressing concern regarding the CalEEMod emissions. Staff sent the CalEEMod files to the SJVAPCD to review. On July 17, 2024 the SJVAPCD contacted staff and explained there was an error in the input information. The 4,040 square foot retail/commercial building had been accidentally inputted as 4,000,040 square feet.

Staff re-ran the CalEEMod on July 18, 2024 with the correct square footage of the retail/commercial building. The Detail Summary report for construction and operational emissions are below as Attachment 2 of this memo.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Unmit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)																		
Unmit.	3.71	3.12	28.0	29.1	0.06	1.17	19.8	21.0	1.08	10.1	11.2	—	6,752	6,752	0.27	0.12	242	6,777
Mit.	3.71	3.12	28.0	29.1	0.06	1.17	7.80	8.97	1.08	3.97	5.05	—	6,752	6,752	0.27	0.12	242	6,777
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—
Daily, Winter (Max)																		
Unmit.	3.82	3.21	29.2	29.5	0.06	1.24	19.8	21.0	1.14	10.1	11.3	—	6,736	6,736	0.27	0.14	0.06	6,760
Mit.	3.82	3.21	29.2	29.5	0.06	1.24	7.80	9.04	1.14	3.97	5.11	—	6,736	6,736	0.27	0.14	0.06	6,760
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—
Average Daily (Max)																		
Unmit.	2.64	2.23	20.0	20.6	0.04	0.84	14.1	15.0	0.77	7.24	8.01	—	4,811	4,811	0.19	0.10	0.72	4,828
Mit.	2.64	2.23	20.0	20.6	0.04	0.84	5.57	6.41	0.77	2.84	3.61	—	4,811	4,811	0.19	0.10	0.72	4,828
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—
Annual (Max)																		
Unmit.	0.48	0.41	3.65	3.77	0.01	0.15	2.58	2.73	0.14	1.32	1.46	—	796	796	0.03	0.02	0.12	799
Mit.	0.48	0.41	3.65	3.77	0.01	0.15	1.02	1.17	0.14	0.52	0.66	—	796	796	0.03	0.02	0.12	799
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un Mit	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	17.4	16.7	8.19	66.6	0.13	0.25	9.89	10.1	0.24	2.52	2.76	118	16,248	16,366	13.4	1.66	317	17,574
Mit.	17.0	16.3	8.14	66.1	0.13	0.25	9.80	10.1	0.24	2.50	2.73	118	16,146	16,264	13.4	1.66	316	17,470
% Reduced	2%	2%	1%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	<0.5%	<0.5%	<0.5%	1%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.1	14.4	9.06	50.5	0.12	0.23	9.69	10.1	0.23	2.52	2.75	118	15,286	15,404	13.5	1.91	274	16,585
Mit.	14.7	14.0	9.00	50.1	0.12	0.23	9.60	10.0	0.23	2.50	2.72	118	15,192	15,310	13.5	1.90	274	16,489
% Reduced	3%	3%	1%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	<0.5%	<0.5%	<0.5%	1%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	13.9	13.4	6.85	41.8	0.09	0.21	7.15	7.37	0.21	1.62	2.03	118	12,580	12,699	13.3	1.73	287	13,833
Mit.	13.5	13.0	6.81	41.5	0.09	0.21	7.09	7.31	0.21	1.61	2.01	118	12,510	12,628	13.3	1.72	286	13,761
% Reduced	3%	3%	1%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	<0.5%	<0.5%	<0.5%	1%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.54	2.44	1.25	7.62	0.02	0.04	1.31	1.34	0.04	0.33	0.37	19.6	2,083	2,102	2.21	0.29	47.4	2,290
Mit.	2.47	2.37	1.24	7.57	0.02	0.04	1.29	1.33	0.04	0.33	0.37	19.6	2,071	2,091	2.21	0.29	47.4	2,278
% Reduced	3%	3%	1%	1%	1%	<0.5%	1%	1%	<0.5%	1%	1%	—	1%	1%	<0.5%	<0.5%	<0.5%	1%

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The corrected information in CalEEMod reduced the construction and operational emissions for the project below the SJVAPCD thresholds. The CalEEMod corrected reports were provided to the SJVAPCD for comment. The Air Quality and Greenhouse Gas Emissions sections of the Initial Study have been updated to include the corrected CalEEMod results. The sections have been included in this memo as Attachment 3.

For the following reasons and pursuant to CEQA §15073.5 recirculation of the mitigated negative declaration is not required.

1. No mitigation measure were replaced with equal or more effective measures pursuant to Section 15074.1.
2. No new project revisions were added in response to written or verbal comments on the project's effects identified in the proposed mitigated negative declaration which are not new avoidable significant effects.
3. No measure or conditions of project approval were added after circulation of the mitigated negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
4. No new information was added to the mitigated negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the mitigated negative declaration.

Hotel	120	Room	4.00	174,240	18,218	—	—	—
Parking Lot	377	Space	3.39	0.00	17,018	—	—	—
Other Non-Asphalt Surfaces	17,530	1000sqft	402	0.00	17,530	—	—	—
Place of Worship	23.7	1000sqft	0.54	23,723	26,915	—	—	—
Strip Mall	4,040	1000sqft	92.7	4,040,000	1,200	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-4*	Use Local and Sustainable Building Materials
Construction	C-6	Use Diesel Particulate Filters
Construction	C-9	Use Dust Suppressants
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-B	Water Active Demolition Sites
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-13	Use Low-VOC Paints for Construction
Transportation	T-34*	Provide Bike Parking

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)														
Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—
CH4	—	—	—	—	—	—	—	—	—	—	—	—	—	—
N2O	—	—	—	—	—	—	—	—	—	—	—	—	—	—
CO2T	—	—	—	—	—	—	—	—	—	—	—	—	—	—
CO2e	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	5.93	5.35	28.0	63.9	0.13	1.17	19.8	21.0	1.08	10.1	11.2	—	25,345	25,345	0.45	2.08	37.9	26,015
Mit.	29.8	29.8	28.0	63.9	0.13	1.17	14.7	15.1	1.08	3.97	5.05	—	25,345	25,345	0.45	2.08	37.9	26,015
% Reduced	-402%	-456%	—	—	—	—	26%	28%	—	61%	55%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.52	4.91	28.0	53.5	0.13	1.17	19.8	21.0	1.08	10.1	11.2	—	24,313	24,313	0.51	2.41	0.99	25,045
Mit.	29.8	29.8	28.0	53.5	0.13	1.17	14.7	15.1	1.08	3.97	5.05	—	24,313	24,313	0.51	2.41	0.99	25,045
% Reduced	-439%	-506%	—	—	—	—	26%	28%	—	61%	55%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.79	3.43	19.0	37.7	0.10	0.78	11.8	12.6	0.72	5.81	6.53	—	17,167	17,167	0.34	1.41	10.1	17,606
Mit.	21.3	21.3	19.0	37.7	0.10	0.78	10.3	10.5	0.72	2.54	3.00	—	17,167	17,167	0.34	1.41	10.1	17,606
% Reduced	-462%	-520%	—	—	—	—	13%	17%	—	56%	54%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.69	0.63	3.47	6.89	0.02	0.14	2.16	2.30	0.13	1.06	1.19	—	2,842	2,842	0.06	0.23	1.67	2,915
Mit.	3.88	3.88	3.47	6.89	0.02	0.14	1.88	1.92	0.13	0.46	0.55	—	2,842	2,842	0.06	0.23	1.67	2,915
% Reduced	-462%	-520%	—	—	—	—	13%	17%	—	56%	54%	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2053	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2054	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2055	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2056	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2057	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2058	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2059	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2060	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2061	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2062	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2063	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2064	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2065	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2066	—	—	—	—	—	1.68	1.68	—	0.42	0.42	—	0.00	0.00	0.00	0.00	—	0.00
2067	< 0.005	< 0.005	—	—	—	1.52	1.52	—	0.38	0.38	—	0.00	0.00	0.00	0.00	—	0.00
2068	< 0.005	< 0.005	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	0.00	0.00	0.00	0.00	—	0.00
2069	< 0.005	< 0.005	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	0.00	0.00	0.00	0.00	—	0.00
2070	2.19	2.19	—	—	—	0.15	0.15	—	0.04	0.04	—	0.00	0.00	0.00	0.00	—	0.00
2071	3.88	3.88	—	—	—	0.25	0.25	—	0.06	0.06	—	0.00	0.00	0.00	0.00	—	0.00
2072	3.76	3.76	—	—	—	0.24	0.24	—	0.06	0.06	—	0.00	0.00	0.00	0.00	—	0.00

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)																		
Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	957	904	644	5,735	11.6	11.4	972	984	10.7	248	258	2,975	1,253.65 7	1,256.63 2	377	95.7	4,637	1,299.22 9
Mit.	957	904	644	5,735	11.6	11.4	972	984	10.7	248	258	2,975	1,253.65 7	1,256.63 2	377	95.7	4,637	1,299.22 9
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	844	790	736	4,833	10.7	11.1	972	983	10.5	248	258	2,975	1,161.86 4	1,164.83 9	386	100	410	1,204.79 4
Mit.	844	790	736	4,833	10.7	11.1	972	983	10.5	248	258	2,975	1,161.86 4	1,164.83 9	386	100	410	1,204.79 4
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	802	753	636	4,491	9.97	10.4	872	882	9.79	222	232	2,975	1,089.89 4	1,092.86 9	377	92.9	2,010	1,131.99 2
Mit.	802	753	636	4,491	9.97	10.4	872	882	9.79	222	232	2,975	1,089.89 4	1,092.86 9	377	92.9	2,010	1,131.99 2
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	146	137	116	820	1.82	1.89	159	161	1.79	40.5	42.3	493	180,444	180,937	62.4	15.4	333	187,414
Mit.	146	137	116	820	1.82	1.89	159	161	1.79	40.5	42.3	493	180,444	180,937	62.4	15.4	333	187,414
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)																		
Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.71	3.12	28.0	29.1	0.06	1.17	19.8	21.0	1.08	10.1	11.2	—	6,752	6,752	0.27	0.12	2.42	6,777
Mit.	3.71	3.12	28.0	29.1	0.06	1.17	7.80	8.97	1.08	3.97	5.05	—	6,752	6,752	0.27	0.12	2.42	6,777
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.82	3.21	29.2	29.5	0.06	1.24	19.8	21.0	1.14	10.1	11.3	—	6,736	6,736	0.27	0.14	0.06	6,760
Mit.	3.82	3.21	29.2	29.5	0.06	1.24	7.80	9.04	1.14	3.97	5.11	—	6,736	6,736	0.27	0.14	0.06	6,760
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.64	2.23	20.0	20.6	0.04	0.84	14.1	15.0	0.77	7.24	8.01	—	4,811	4,811	0.19	0.10	0.72	4,828
Mit.	2.64	2.23	20.0	20.6	0.04	0.84	5.57	6.41	0.77	2.84	3.61	—	4,811	4,811	0.19	0.10	0.72	4,828
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.48	0.41	3.65	3.77	0.01	0.15	2.58	2.73	0.14	1.32	1.46	—	796	796	0.03	0.02	0.12	799
Mit.	0.48	0.41	3.65	3.77	0.01	0.15	1.02	1.17	0.14	0.52	0.66	—	796	796	0.03	0.02	0.12	799
% Reduced	—	—	—	—	—	—	61%	57%	—	61%	55%	—	—	—	—	—	—	—

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	17.4	16.7	8.19	66.6	0.13	0.25	9.89	10.1	0.24	2.52	2.76	118	16,248	16,366	13.4	1.86	317	17,574
Mit.	17.0	16.3	8.14	66.1	0.13	0.25	9.80	10.1	0.24	2.50	2.73	118	16,146	16,264	13.4	1.86	316	17,470
% Reduced	2%	2%	1%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	< 0.5%	< 0.5%	< 0.5%	1%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	15.1	14.4	9.06	50.5	0.12	0.23	9.89	10.1	0.23	2.52	2.75	118	15,286	15,404	13.5	1.91	274	16,585
Mit.	14.7	14.0	9.00	50.1	0.12	0.23	9.80	10.0	0.23	2.50	2.72	118	15,192	15,310	13.5	1.90	274	16,489
% Reduced	3%	3%	1%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	< 0.5%	< 0.5%	< 0.5%	1%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	13.9	13.4	6.85	41.8	0.09	0.21	7.15	7.37	0.21	1.82	2.03	118	12,580	12,699	13.3	1.73	287	13,833
Mit.	13.5	13.0	6.81	41.5	0.09	0.21	7.09	7.31	0.21	1.81	2.01	118	12,510	12,628	13.3	1.72	286	13,761
% Reduced	3%	3%	1%	1%	—	—	1%	1%	—	1%	1%	—	1%	1%	< 0.5%	< 0.5%	< 0.5%	1%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.54	2.44	1.25	7.62	0.02	0.04	1.31	1.34	0.04	0.33	0.37	19.6	2,083	2,102	2.21	0.29	47.4	2,290
Mit.	2.47	2.37	1.24	7.57	0.02	0.04	1.29	1.33	0.04	0.33	0.37	19.6	2,071	2,091	2.21	0.29	47.4	2,278
% Reduced	3%	3%	1%	1%	1%	< 0.5%	1%	1%	< 0.5%	1%	1%	—	1%	1%	< 0.5%	< 0.5%	< 0.5%	1%



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- e) The site is currently designated for urban uses and is an infill site. The surrounding properties are developed with a mix of commercial and industrial uses. Development of the site will not involve changes in the existing environment which will result in conversion of farmland or forest land as the properties in the area are already developed with commercial and industrial uses or are zoned for commercial and industrial uses.

Sources: CA Dept. of Conservation Farmland Mapping and Monitoring Program, 2020; City of Turlock, General Plan, Land Use Element, 2012; City of Turlock, General Plan EIR, 2012;

Mitigation:

None

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
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3. Air Quality - Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?			X	

Response:

a), b), c) The project will not conflict with, or obstruct, implementation of the 2007 PM10 Maintenance Plan, the 2016 Ozone Plan, or the 2012, 2015 and 2018 PM2.5 Plan or related subsequent progress reports of these plans. SJVAPCD has established thresholds for ROG, NOx, PM 10 & PM 2.5 emissions. The project will be subject to San Joaquin Valley Air District rules and regulations designed to control criteria pollutants, such as Rule 9510 and Regulation VIII. The project is required to obtain these permits to construct and operate. As such, the project is not expected to cause a conflict with, or obstruct implementation of applicable air quality plans.

The CalEEMod analysis run on June 24, 2024 had incorrectly identified the square footage of the commercial/retail building as 4,000,040 square feet. The correct square footage of the commercial building is 4,040 square feet. The air quality analysis was re-run using the correct square footage of the commercial building. Based on the CalEEMod 2022.1.1.24 analysis run on July 18, 2024 the project is located in an urbanized area surrounded by commercial and industrial uses in Climate Zone 3, wind speeds 3.1 m/s, and 29 days precipitation frequency. When the construction emissions and operational emissions were calculated in the CalEEMOD models, it was found that emissions would not exceed the established Air Quality Thresholds of Significance for Construction Emissions for ROG (10 tons per year), NOx (10 tpy), PM 10 (15 tpy) & PM 2.5 (15 tpy) emissions. The operational emissions calculated in the CalEEMOD 2022.1.1.24 model, would exceeded 1 ton per year for



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each of the established thresholds for ROG, NOx, PM 10 & PM 2.5. However, the SJVAPCD has published guidance on determining potential significant impacts and potential mitigation of significant impacts in its Guidance for Assessing and Mitigating Air Quality Impacts (GMAQI). The District has established thresholds of Significance for criteria pollutant emissions, which are based on the District's New Source Review (NSR) offset requirements for stationary sources. Using the project type, size, and number of vehicle trips, the District has pre-quantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants.

The SJVAPCD Small Project Level Analysis Levels (SPAL) pre-quantified the following land use types and sizes:

Retail: Strip Mall	46,000 square feet
Educational: Place of Worship	141,000 square feet
Recreational: Hotel	228 rooms

The proposed project is the development of two properties, totaling approximately 7-acres, with a 2-story 23,723 square foot banquet hall/event center, 5-story 120-room hotel, and a 4,040 square foot commercial building.

Based on the project type and the SJVAPCD SPAL the proposed project is not expected to exceed the thresholds of significance for criteria pollutants.

Overall Construction Emissions

CalEEMOD 2022.1.1.24 ROG 0.41 tpy, NOx 3.65 tpy, CO 3.77 tpy SOx 0.01 tpy, PM_{10E} 0.15 tpy PM_{10D} 2.58, PM_{2.5E} 0.14 tpy, PM_{2.5D} 1.32 and PM_{2.5T} 1.46

Overall Operational Emissions

CalEEMOD 2022.1.1.24: ROG 2.4 tpy, NOx 1.25 tpy, CO 7.62 tpy SOx 0.02 tpy, PM_{10E} 0.04 tpy PM_{10D} 1.31 PM_{10T} 1.34 and PM_{2.5E} 0.04 tpy. PM_{2.5D} 0.33 PM_{2.5T} 0.37

A variety of toxic air contaminants (TACs) are of environmental concern. The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommended setback distances for sensitive land uses from major sources of TACs such as gas stations, freeways and high traffic roads, distribution centers and dry cleaners. The SJVAPCD defines sensitive receptors "people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s)." The proposed project will not place sensitive receptors within any recommended setback distance of any existing source of TACs, and therefore would not expose sensitive receptors to TAC emissions.

Furthermore, to ensure compliance with District standards the mitigation measures identified below will be incorporated as conditions of approval for the project.

The project will not violate any air quality standards, result in cumulatively considerable net increase of any criteria pollutant, or expose sensitive receptors to substantial pollutant concentrations. Compliance with the General Plan policies and standards, and the SJVAPCD Rules and Regulations is expected to reduce the project impacts; however, the Turlock General Plan EIR found that there would be significant and unavoidable air quality impacts even with implementation of these measures with the build out of the General Plan primarily



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due to local and regional vehicle emissions generated by future population growth associated with the build out of the proposed plan. A Statement of Overriding Considerations has been adopted as part of that process.

Additionally, the City of Turlock adopted an Air Quality and Greenhouse Gas Emissions Element demonstrating that the General Plan would reduce greenhouse gas emissions. Compliance with the State's greenhouse gas emissions targets for 2030 relied on the adoption of the regional Sustainable Communities Strategy (SCS). StanCOG's SCS has been adopted and was approved by the California Air Resources Board. StanCOG has found that the City of Turlock's General Plan complies with the SCS. This project is consistent with the General Plan; therefore, the project is expected to have a less than significant impact on greenhouse gas emissions.

- d) The proposed commercial project will not produce other pollutants such as odors. The proposed development is not expected to expose sensitive receptors to increased pollutants. The project may produce odors during the construction phase, however, these impacts are short-term in nature and are anticipated to be of a less-than-significant impact.

Sources: *San Joaquin Valley Unified Air Pollution Control District 2016 Plan for the 2008 8-Hour Ozone Standard, 2010 PM-10 Maintenance Plan, 2012 and 2015 PM-2.5 Plan; SJV.APCD's Guide For Assessing and Mitigating Air Quality Impacts (revised March 19, 2015); California Air Resources Board Air Quality and Land Use Handbook: A Community Health Perspective; Turlock General Plan EIR, 2012, Turlock General Plan, Air Quality and Greenhouse Gas Element Section, 2012; Statement of Overriding Considerations (Turlock City Council Resolution 2012-156); StanCOG Regional Transportation plan/Sustainable Communities Strategy Letter of Consistency for the Turlock General Plan dated January 25, 2015; SJVUAPCD (June 2005) Air Quality Guidelines for General Plans; San Joaquin Valley Air Pollution Control District comment letter dated June 11, 2024; CalEEMod Air Quality Analysis report dated June 24, 2024 available upon request;*

Mitigation:

1. The applicant shall comply with all applicable San Joaquin Valley Air Pollution Control District rules and regulations. The applicant shall contact the SJVAPCD prior to submitting an application for a building, grading and/or encroachment permit. Compliance with Rule 9510 shall be demonstrated to the Planning Division prior to the issuance of a building permit.
2. TMC§9-2-211 Bike racks shall be installed to encourage alternative modes of transportation.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
4. Biological Resources - Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U. S. Fish and Wildlife Service?		X		



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d) Less than one percent of the soils located in the General Plan study area are considered to have moderate potential for expansion. As required by the Turlock Municipal Code, building permit applications must be accompanied by a preliminary soil management report that characterizes soil properties in the development area. The project will comply with GP 10.2-a, 10.2-b, 10.2-g; The project shall comply with the California Building Code (CBC) requirements for specific site development and construction standards for specified soils types.

e) Development within the project area will be required to connect to the City of Turlock's waste water system and will not utilize any type of septic system or alternative wastewater system.

f) The proposed project is an infill project proposed to be constructed on two undeveloped parcels totaling approximately 7-acres located in an urbanized area surrounded by a mix of commercial and industrial uses. As a result of many years of extensive agricultural production, virtually all of the land in the City of Turlock has been previously altered from its native state.

Sources: California Uniform Building Code; City of Turlock, Standard Specifications, Grading Practices; City of Turlock Municipal Code, Title 8, (Building Regulations); City of Turlock, General Plan, Safety Element, 2012;

Mitigation:

1. The project shall comply with the current California Building Code (CBC) requirements for Seismic Zone 3, which stipulates building structural material and reinforcement.
2. The project shall comply with California Health and Safety Code Section 19100 et seq. (Earthquake Protection Law), which requires that buildings be designed to resist stresses produced by natural forces caused earthquakes and wind.
3. The project shall comply with the California Building Code (CBC), Chapter 70, regulating grading activities including drainage and erosion control.
4. The project shall comply with the City's NPDES permitting requirements by providing a grading and erosion control plan, including but not limited to the preparation of a Storm Water Pollution Prevent Plan and Erosion and Sediment Control Plan.
5. The project shall comply with the California Building Code (CBC) requirements for specific site development and construction standards for specified soils types.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
8. Greenhouse Gas Emissions - Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X		
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
<u>Response:</u>				
a), b) The project will not conflict with, or obstruct, implementation of the 2007 PM10 Maintenance				



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Plan, the 2016 Ozone Plan, or the 2012, 2015 and 2018 PM_{2.5} Plan or related subsequent progress reports of these plans. SJVAPCD has established thresholds for ROG, NO_x, PM₁₀ & PM_{2.5} emissions. The project will be subject to San Joaquin Valley Air District rules and regulations designed to control criteria pollutants, such as Rule 9510 and Regulation VIII. The project is required to obtain these permits to construct and operate. As such, the project is not expected to cause a conflict with, or obstruct implementation of applicable air quality plans.

The CalEEMod analysis run on June 24, 2024 had incorrectly identified the square footage of the commercial/retail building as 4,000,040 square feet. The correct square footage of the commercial building is 4,040 square feet. The air quality analysis was re-run using the correct square footage of the commercial building. Based on the CalEEMod 2022.1.1.24 analysis run on July 18, 2024 the project is located in an urbanized area surrounded by commercial and industrial uses in Climate Zone 3, wind speeds 3.1 m/s, and 29 days precipitation frequency. When the construction emissions and operational emissions were calculated in the CalEEMOD models, it was found that emissions would not exceed the established Air Quality Thresholds of Significance for Construction Emissions for ROG (10 tons per year), NO_x (10 tpy), PM₁₀ (15 tpy) & PM_{2.5} (15 tpy) emissions. The operational emissions calculated in the CalEEMOD 2022.1.1.24 model, would exceeded 1 ton per year for each of the established thresholds for ROG, NO_x, PM₁₀ & PM_{2.5}. However, the SJVAPCD has published guidance on determining potential significant impacts and potential mitigation of significant impacts in its Guidance for Assessing and Mitigating Air Quality Impacts (GMAQI). The District has established thresholds of Significance for criteria pollutant emissions, which are based on the District's New Source Review (NSR) offset requirements for stationary sources. Using the project type, size, and number of vehicle trips, the District has pre-quantified emissions and determined values below which it is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants.

The SJVAPCD Small Project Level Analysis Levels (SPAL) pre-quantified the following land use types and sizes:

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The propose project is the development of two properties, totaling approximately 7-acres, with a 2-story 23,723 square foot banquet hall/event center, 5-story 120-room hotel, and a 4,040 square foot commercial building.

Based on the project type and the SJVAPCD SPAL the proposed project is not expected to exceed the thresholds of significance for criteria pollutants.

Overall Construction Emissions

CalEEMOD 2022.1.1.24 ROG 0.41 tpy, NO_x 3.65 tpy, CO 3.77 tpy SO_x 0.01 tpy, PM_{10E} 0.15 tpy PM_{10D} 2.58, PM_{2.5E} 0.14 tpy, PM_{2.5D} 1.32 and PM_{2.5T} 1.46

Overall Operational Emissions

CalEEMOD 2022.1.1.24: ROG 2.4 tpy, NO_x 1.25 tpy, CO 7.62 tpy SO_x 0.02 tpy, PM_{10E} 0.04 tpy PM_{10D} 1.31 PM_{10T} 1.34 and PM_{2.5E} 0.04 tpy. PM_{2.5D} 0.33 PM_{2.5T} 0.37



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A variety of toxic air contaminants (TACs) are of environmental concern. The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommended setback distances for sensitive land uses from major sources of TACs such as gas stations, freeways and high traffic roads, distribution centers and dry cleaners. The SJVAPCD defines sensitive receptors "people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s)." The proposed project will not place sensitive receptors within any recommended setback distance of any existing source of TACs, and therefore would not expose sensitive receptors to TAC emissions.

Furthermore, to ensure compliance with District standards the mitigation measures identified below will be incorporated as conditions of approval for the project.

The project will not violate any air quality standards, result in cumulatively considerable net increase of any criteria pollutant, or expose sensitive receptors to substantial pollutant concentrations. Compliance with the General Plan policies and standards, and the SJVAPCD Rules and Regulations is expected to reduce the project impacts; however, the Turlock General Plan EIR found that there would be significant and unavoidable air quality impacts even with implementation of these measures with the build out of the General Plan primarily due to local and regional vehicle emissions generated by future population growth associated with the build out of the proposed plan. A Statement of Overriding Considerations has been adopted as part of that process.

Additionally, the City of Turlock adopted an Air Quality and Greenhouse Gas Emissions Element demonstrating that the General Plan would reduce greenhouse gas emissions. Compliance with the State's greenhouse gas emissions targets for 2030 relied on the adoption of the regional Sustainable Communities Strategy (SCS). StanCOG's SCS has been adopted and was approved by the California Air Resources Board. StanCOG has found that the City of Turlock's General Plan complies with the SCS. This project is consistent with the General Plan; therefore, the project is expected to have a less than significant impact on greenhouse gas emissions.

Sources: City of Turlock 2012 General Plan, Air Quality and Greenhouse Gases chapter; AB 32 Scoping Plan; 2014 Stanislaus Council of Governments Regional Transportation Plan and Sustainable Communities Strategy; San Joaquin Valley Air Pollution Control District comment letter dated June 11, 2024; CalEEMod Air Quality Analysis report dated June 24, 2024 available upon request.

Mitigation:

1. GP 8.1-b, 8.1-j, 8.1-l; The applicant shall comply with all applicable San Joaquin Valley Air Pollution Control District rules and regulations.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
9. Hazards and Hazardous Materials - Would the project:				