Exhibit C

AIR QUALITY & GREENHOUSE GAS IMPACT ASSESSMENT

FOR

ALLEGRETTO RESORT EXPANSION PROJECT

PASO ROBLES, CA

MARCH 2025

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LIST OF COMMON TERMS & ACRONYMS

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
APS	Alternative Planning Strategy
AQI	Air Quality Index
ARB	California Air Resources Board
ATCM	Air Toxics Control Measure
BAAQMD	Bay Area Air Quality Management District
BACT	Best Available Control Technology
BSC	Building Standards Commission
C_2F_6	Perfluoroethane
C_3F_8	Perfluoropropane
C_4F_{10}	Perfluorobutane
C_4F_8	Perfluorocyclobutane
C_5F_{12}	Perfluoropentane
C_6F_{14}	Perfluorohexane
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CAMP	Construction Activity Management Plan
CAPCOA	California Air Pollution Control Officers Association
CBC	California Building Code
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act
CF_4	Perfluoromethane
CH4	Methane
City	City of Paso Robles
CNG	Compressed Natural Gas
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
CVC	California Vehicle Code
DPM	Diesel-Exhaust Particulate Matter or Diesel-Exhaust PM
EV	Electric Vehicle
FCAA	Federal Clean Air Act
GHG	Greenhouse Gases
GWP	Global Warming Potential
HAP	Hazardous Air Pollutant
HFC	Hydrofluorocarbons
hp	Horsepower
LNG	Liquified Natural Gas
LOS	Level of Service
MMT	Million Metric Tons
mph	Miles per Hour

LIST OF COMMON TERMS & ACRONYMS (CONTINUED)

MPO	Metropolitan Planning Organization
MT	Metric Tons
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NESHAPs	National Emission Standards for HAPs
NF_3	Nitrogen Trifluoride
NHTSA	National Highway Traffic Safety Administration
NO_2	Nitrogen Dioxide
NOA	Naturally-Occurring Asbestos
NO_X	Oxides of Nitrogen
O_3	Ozone
OPR	Office of Planning and Research
Pb	Lead
PFC	Perfluorocarbons
PM	Particulate Matter
PM_{10}	Fugitive Particulate Matter (less than 10 micrometers)
$PM_{2.5}$	Fine Particulate Matter (less than 2.5 micrometers)
ppb	Parts per Billion
ppm	Parts per Million
Project	Allegretto Resort Expansion Project
PV	Photovoltaic
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
SB	Senate Bill
SCCAB	South Central Coast Air Basin
SCS	Sustainable Communities Strategy
SF_6	Sulfur Hexafluoride
SLCP	Short-lived Climate Pollutant
SLOAPCD	San Luis Obispo Air Pollution Control District
SLOCOG	San Luis Obispo Council of Governments
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO_2	Sulfur Dioxide
SP	Service Population
TAC	Toxic Air Contaminant
U.S. EPA	United State Environmental Protection Agency
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
ZNE	Zero Net Energy
$\mu g/m^3$	Micrograms per cubic meter
µm	Micrometer

INTRODUCTION

This report provides an analysis of air quality and greenhouse gas (GHG) impacts associated with the proposed development of the Allegretto Resort Expansion Project (project). This report also provides a summary of existing conditions in the project area and the applicable regulatory framework pertaining to air quality and climate change.

PROPOSED PROJECT SUMMARY

The proposed project is located in the City of Paso Robles at the southeast corner of Buena Vista Drive and Dallons Drive. The project includes development of a mix of land uses, including hotel suites, event space, restaurant, conference center, pickleball courts, gardens and vineyards. The proposed project's site plan is depicted in Figure 1.

AIR QUALITY

Existing Setting

The project is located in the City of Paso Robles (City), within the South Central Coast Air Basin (SCCAB), and within the jurisdiction of the San Luis Obispo County Air Pollution Control District (SLOAPCD). Air quality in the SCCAB is influenced by a variety of factors, including topography, and local and regional meteorology.

Topography

The City sits on the rolling hills of the eastern side of the Santa Lucia Mountain Range. It is bounded from the northwest by the Santa Lucia Mountain Range, which extends almost the entire length of the county. Rising sharply to about 3,000 feet at its northern boundary, the Santa Lucia Range gradually winds southward away from the coast, finally merging into a mass of rugged features on the north side of Cuyama Canyon. Point Buchon juts into the Pacific just south of Morro Bay to form the protective harbor of San Luis Obispo Bay. The Irish Hills are the dominant feature on this knob of land, rising abruptly from the shore to form steep cliffs and generally complex terrain from the Los Osos/Montana de Oro State Park area to Pismo Beach. These headlands have a pronounced influence on local wind flow patterns.

Estuaries are also a notable feature of the coastal areas, occurring wherever flowing streams meet the ocean. Morro Bay contains the region's largest estuary, with a saltwater marsh located on the east side where Chorro and Los Osos creeks enter the bay. This is one of the most significant wetlands remaining on the California coast and has been designated part of the National Estuary Program. It provides nesting habitat for blue herons, cranes, and other important types of woodland birds and wildlife. Smaller coastal lagoons and marshes are also scattered along the county's shoreline.

Local and Regional Meteorology

The climate of the county can be generally characterized as Mediterranean, with warm, dry summers and cooler, relatively damp winters. Along the coast, mild temperatures are the rule throughout the year due to the moderating influence of the Pacific Ocean. This effect is diminished inland in proportion to the distance from the ocean or by major intervening terrain features, such as the coastal mountain ranges. As a result, inland areas are characterized by a considerably wider range of temperature conditions. Maximum summer temperatures average about 70 degrees Fahrenheit near the coast, while inland valleys are often in the high 90s. Minimum winter temperatures average from the low 30s along the coast to the low 20s inland (SLOAPCD 2001).

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Figure 1. Proposed Site Plan

Regional meteorology is largely dominated by a persistent high-pressure area that commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause seasonal changes in the weather patterns of the area. The Pacific High remains generally fixed several hundred miles offshore from May through September, enhancing onshore winds and opposing offshore winds.

During spring and early summer, as the onshore breezes pass over the cool water of the ocean, fog, and low clouds often form in the marine air layer along the coast. Surface heating in the interior valleys dissipates the marine layer as it moves inland (SLOAPCD 2001).

From November through April the Pacific High tends to migrate southward, allowing northern storms to move across the county. About 90 percent of the total annual rainfall is received during this period. Winter conditions are usually mild, with intermittent periods of precipitation followed by mostly clear days. Rainfall amounts can vary considerably among different regions in the county. In the Coastal Plain, annual rainfall averages 16 to 28 inches, while the Upper Salinas River Valley generally receives about 12 to 20 inches of rain. The Carrizo Plain is the driest area of the county with less than 12 inches of rain in a typical year (SLOAPCD 2001).

Airflow around the county plays an important role in the movement and dispersion of pollutants. The speed and direction of local winds are controlled by the location and strength of the Pacific High-pressure system and other global patterns, by topographical factors, and by circulation patterns resulting from temperature differences between the land and sea. In spring and summer months, when the Pacific High attains its greatest strength, onshore winds from the northwest generally prevail during the day. At night, as the sea breeze dies, weak drainage winds flow down the coastal mountains and valleys to form a light, easterly land breeze (SLOAPCD 2001).

In the Fall, onshore surface winds decline, and the marine layer grows shallow, allowing an occasional reversal to a weak offshore flow. This, along with the diurnal alternation of land-sea breeze circulation, can sometimes produce a "sloshing" effect. Under these conditions, pollutants may accumulate over the ocean for a period of one or more days and are subsequently carried back onshore with the return of the sea breeze. Strong inversions can form at this time, "trapping" pollutants near the surface (SLOAPCD 2001).

This effect is intensified when the Pacific High weakens or moves inland to the east. This may produce a "Santa Ana" condition in which air, often pollutant-laden, is transported into the county from the east and southeast. This can occur over a period of several days until the high-pressure system returns to its normal location, breaking the pattern. The breakup of Santa Ana conditions may result in relatively stagnant conditions and a buildup of pollutants offshore. The onset of the typical daytime sea breeze can bring these pollutants back onshore, where they combine with local emissions to cause high pollutant concentrations. Not all occurrences of the "post-Santa Ana" conditions lead to high ambient pollutant levels, but it does play an important role in the air pollution meteorology of the county (SLOAPCD 2001).

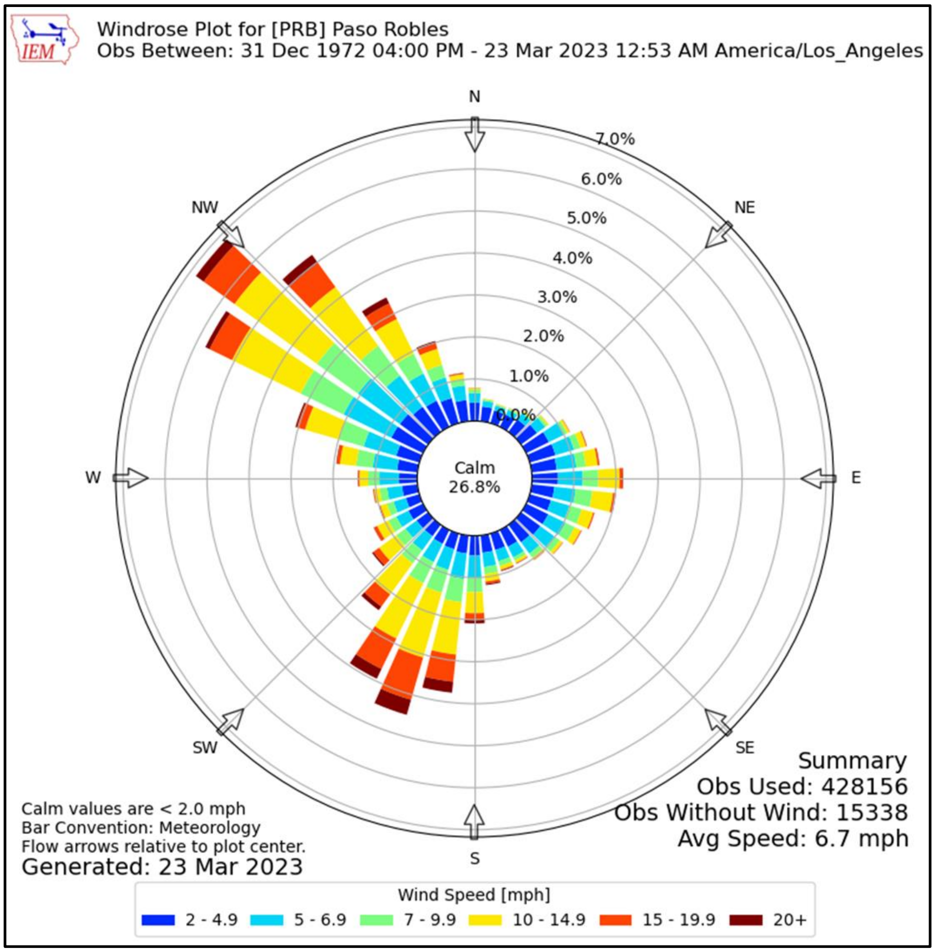
Predominant wind flow in the project area, based on historical meteorological data from the Paso Robles Municipal Airport, is depicted in Figure 2. As depicted, wind flow in the project area is predominantly from the northwest, averaging approximately 6.7 miles per hour (mph). Calm winds are present an average of approximately 26.8 percent of the time.

Atmospheric Stability and Dispersion

Air pollutant concentrations are primarily determined by the amount of pollutant emissions in an area and the degree to which these pollutants are dispersed into the atmosphere. The stability of the atmosphere is one of the key factors affecting pollutant dispersion. Atmospheric stability regulates the amount of vertical and horizontal air exchange or mixing that can occur within a given air basin. Restricted mixing and low wind speeds are generally associated with a high degree of stability in the atmosphere. These conditions are characteristic of temperature inversions (SLOAPCD 2001).

In the atmosphere, air temperatures normally decrease as altitude increases. At varying distances above the earth's surface, however, a reversal of this gradient can occur. This condition termed an inversion, is simply a warm layer of air above a layer of cooler air, and it has the effect of limiting the vertical dispersion of pollutants. The height of the inversion determines the size of the mixing volume trapped below. Inversion strength or intensity is measured by the thickness of the layer and the difference in temperature between the base and the top of the inversion. The strength of the inversion determines how easily it can be broken by wind or solar heating (SLOAPCD 2001).

Figure 2. Paso Robles Municipal Airport Wind Rose Plot



Source: Iowa Environmental Mesonet 2023

Several types of inversions are common to this area. Weak, surface inversions are caused by radiational cooling of air in contact with the cold surface of the earth at night. In valleys and low-lying areas, this condition is intensified by the addition of cold air flowing downslope from the hills and pooling on the valley floor. Surface inversions are a common occurrence throughout the county during the winter, particularly on cold mornings when the inversion is strongest. As the morning sun warms the earth and the air near the ground, the inversion lifts, gradually dissipating as the day progresses. During the late spring and early summer months, cool air over the ocean can intrude under the relatively warmer air over land, causing a marine inversion. These inversions can restrict dispersion along the coast, but they are typically shallow and will dissipate with surface heating (SLOAPCD 2001).

In contrast, in the summertime, the presence of the Pacific high-pressure cell can cause the air mass aloft to sink. As the air descends, compressional heating warms it to a temperature higher than the air below. This highly stable atmospheric condition, termed a subsidence inversion, is common to all of coastal California and can act as a nearly impenetrable lid to the vertical mixing of pollutants. The base of the inversion typically ranges from 1,000 to 2,500 feet above sea level; however, levels as low as 250 feet, among the lowest anywhere in the state, have been recorded on the coastal plateau in San Luis Obispo County. The strength of these inversions makes them difficult to disrupt. Consequently, they can persist for one or more days, causing air stagnation and the buildup of pollutants. Highest or worst-case ozone levels are often associated with the presence of this type of inversion (SLOAPCD 2001).

Criteria Air Pollutants

For the protection of public health and welfare, the Clean Air Act (CAA) required that the United States Environmental Protection Agency (U.S. EPA) establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as "criteria" pollutants because the U.S. EPA publishes criteria documents to justify the choice of standards. These standards define the maximum amount of an air pollutant that can be present in ambient air without harm to the public's health. An ambient air quality standard is generally specified as a concentration averaged over a specific time period, such as one hour, eight hours, 24 hours, or one year. The different averaging times and concentrations are meant to protect against different exposure effects. The CAA allows states to adopt additional or more health-protective standards. The air quality regulatory framework and ambient air quality standards are discussed in greater detail later in this report.

Human Health & Welfare Effects

Common air pollutants and associated adverse health and welfare effects are summarized in Table 1. Within the SCCAB, the air pollutants of primary concern, with regard to human health, include ozone, particulate matter (PM), and carbon monoxide (CO). As depicted in Table 1, exposure to increased pollutant concentrations of ozone, PM and CO can result in various heart and lung ailments, cardiovascular and nervous system impairment, and death.

Table 1. Common Pollutants & Adverse Effects

Pollutant	Human Health & Welfare Effects
Particulate Matter (PM_{10} & $PM_{2.5}$)	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Ozone (O_3)	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Sulfur Dioxide (SO_2)	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron, and steel; damage crops and natural vegetation. Impairs visibility. A precursor to acid rain.
Carbon Monoxide (CO)	Reduces the ability of blood to deliver oxygen to vital tissues, effecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	Respiratory irritant; aggravates lung and heart problems. A precursor to ozone and acid rain. Contributes to global warming, and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.
Source: ARB 2018	

Odors

Typically, odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (i.e. irritation, anger, or anxiety) to physiological, including circulatory and respiratory effects, nausea, vomiting, and headache.

Neither the state nor the federal governments have adopted rules or regulations for the control of odor sources. The SLOAPCD does not have an individual rule or regulation that specifically addresses odors; however, odors would be applicable to SLOAPCD's Rule 402, Nuisance. Any actions related to odors would be based on citizen complaints to local governments and the SLOAPCD. The SLOAPCD recommends that odor impacts be addressed in a qualitative manner. Such analysis shall determine if the project results in excessive nuisance odors, as defined under the California Code of Regulations, Health & Safety Code Section 41700, air quality public nuisance.

Toxic Air Contaminants

Toxic air contaminants (TACs) are air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air, but due to their high toxicity, they may pose a threat to public health even at very low concentrations. Because there is no threshold level below which adverse health impacts are not expected to occur, TACs differ from criteria pollutants for which acceptable levels of exposure can be determined and for which state and federal governments have set ambient air quality standards. TACs, therefore, are not considered "criteria pollutants" under either the Federal Clean Air Act (FCAA) or the California Clean Air Act (CCAA) and are thus not subject to National or State ambient air quality standards (AAQS). TACs are not considered criteria pollutants in that the FCAA and CCAA do not address them specifically through the setting of National or State AAQS. Instead, the U.S. EPA and California Air Resources Board (ARB) regulate Hazardous Air Pollutants (HAPs) and TACs, respectively, through statutes and regulations that generally require the use of the maximum or best available control technology to limit emissions. In conjunction with District rules, these federal and state statutes and regulations establish the regulatory framework for TACs. At the national level, the U.S. EPA has established National Emission Standards for HAPs (NESHAPs), in accordance with the requirements of the FCAA and subsequent amendments. These are technology-based source-specific regulations that limit allowable emissions of HAPs.

Within California, TACs are regulated primarily through the Tanner Air Toxics Act [Assembly Bill (AB) 1807] and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act sets forth a formal procedure for ARB to designate substances as TACs. This includes research, public participation, and scientific peer review before ARB designates a substance as a TAC. Existing sources of TACs that are subject to the Air Toxics Hot Spots Information and Assessment Act are required to: (1) prepare a toxic emissions inventory; (2) prepare a risk assessment if emissions are significant; (3) notify the public of significant risk levels; and (4) prepare and implement risk reduction measures.

At the state level, the ARB has authority for the regulation of emissions from motor vehicles, fuels, and consumer products. Most recently, diesel-exhaust particulate matter (DPM) was added to the ARB list of TACs. DPM is the primary TACs of concern for mobile sources. Of all controlled TACs, emissions of DPM are estimated to be responsible for about 70 percent of the total ambient TAC risk. The ARB has made the reduction of the public's exposure to DPM one of its highest priorities, with an aggressive plan to require cleaner diesel fuel and cleaner diesel engines and vehicles (ARB 2005).

At the local level, air districts have authority over stationary or industrial sources. All projects that require air quality permits from the SLOAPCD are evaluated for TAC emissions. The SLOAPCD limits emissions and public exposure to TACs through a number of programs. The SLOAPCD prioritizes TAC-emitting stationary sources, based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors. The SLOAPCD requires a comprehensive health risk assessment for facilities that are classified in the significant-risk category, pursuant to AB 2588. No major existing sources of TACs have been identified in the project area.

Asbestos

Asbestos is the common name for a group of naturally-occurring fibrous silicate minerals that can separate into thin but strong and durable fibers. Naturally-occurring asbestos (NOA), which was identified as a TAC in 1986 by ARB, is located in many parts of California and is commonly associated with ultramafic rock. The project site is not located within an area identified as having a potential for naturally-occurring ultramafic rock and serpentine soils.

Ambient Air Quality

Air pollutant concentrations are measured at several monitoring stations in the SCCAB. The Paso Robles-Santa Fe Avenue is the closest representative monitoring station with sufficient data to meet U.S. EPA and/or ARB criteria for quality assurance. Ambient monitoring data was obtained for the last three years of available measurement data (i.e., 2021 through 2023) and is summarized in Table 2. As depicted, the state $PM_{2.5}$

standards were exceeded for 3 days in 2021 and was exceeded for 2 days in 2023. Measured 24-hour PM_{10}, 8-hour ozone, 1-hour ozone, and NO_2 concentrations did not exceed the state and federal ambient air quality standards in the last three years of monitoring.

Table 2. Summary of Ambient Air Quality Monitoring Data

Pollutant	Monitoring Year		
	2021	2022	2023
Ozone (O_3)(1)			
Maximum concentration (1-hour/8-hour average; ppm)	0.070/0.065	0.074/0.068	0.075/0.066
Number of days state/national 1-hour standard exceeded	0/0	0/0	0/0
Number of days state/national 8-hour standard exceeded	0/0	0/0	0/0
Nitrogen Dioxide (NO_2)(2)			
Maximum concentration (1-hour average; ppb)	44.0	26.0	50.7
Number of days state/national standard exceeded	0/0	0/0	0/0
Suspended Particulate Matter ($PM_{2.5}$)(2)			
Maximum 24-hour concentration (national/state; µg/m3)	19.1/19.1	24.3/24.3	28.7/28.7
Number of days national standard exceeded (measured/calculated)(3)	0/0	0/0	0/0
Suspended Particulate Matter (PM_{10})(1)			
Maximum concentration (national/state; µg/m3)	74.4/74.7	46.8/46.1	54.1/52.9
Number of days state standard exceeded (measured/calculated)(3)	3/3.1	0/NA	2/2
Number of days national standard exceeded (measured/calculated)(3)	0/0	0/0	0/0

ppm = parts per million by volume, µg/m³ = micrograms per cubic meter, NA=Not Available

1. *Based on ambient concentrations obtained from the Paso Robles-Santa Fe Avenue. Monitoring Station.*
2. *Based on ambient concentrations obtained from the Atascadero-Lift Station #5 Monitoring Station.*
3. *Measured days are those days that an actual measurement was greater than the standard. Calculated days are estimated days that measurement would have exceeded the standard had measurements been collected every day.*

Source: ARB 2025

Air Quality Index

The health effects of ambient air pollutant concentrations can be evaluated and presented in various ways. The most common method is the use of the Air Quality Index (AQI). The U.S. EPA developed the AQI as an easy-to-understand measure of health impacts based on measured ambient air quality in comparison to established ambient air quality standards. Tables 3 and 4 present a summary of the health impacts for ozone and fine particulate matter ($PM_{2.5}$), respectively, based on the U.S. EPA's AQI.

A summary of the annual air quality index for the project area, based on monitoring data obtained from the Paso Robles monitoring station for the last three years of available data, is provided in Table 5. As depicted in Table 5, the project area typically experiences "good" air quality with the total number of days ranging from 117 to 207 days per year. Days classified as "moderate" AQI ranged from 152 to 245 days per year. Over the last three years of available data, the area has experienced a total of 17 days classified as "Unhealthy for Sensitive Groups". Over the past three years, the area has not experienced air quality conditions within the "Unhealthy", "Very Unhealthy" or "Hazardous" range (U.S. EPA 2023).

Table 3. Air Quality Index Summary for Ozone & Related Health Effects

Air Quality Index / 8-hour Ozone Concentration	Health Effects Description
AQI 51-100: Moderate Ambient Ozone Concentrations: 55-70 ppb	Sensitive Groups: Children and people with asthma are the groups at most risk. Health Effects Statements: Unusually sensitive individuals may experience respiratory symptoms. Cautionary Statements: Unusually sensitive people should consider limiting prolonged outdoor exertion.
AQI 101-150: Unhealthy for Sensitive Groups Ambient Ozone Concentrations: 71-85 ppb	Sensitive Groups: Children and people with asthma are the groups at most risk. Health Effects Statements: Increasing likelihood of respiratory symptoms and breathing discomfort in active children and adults and people with respiratory disease, such as asthma. Cautionary Statements: Active children and adults, and people with respiratory disease, such as asthma, should limit prolonged outdoor exertion.
AQI 151–200: Unhealthy Ambient Ozone Concentrations: 86-105 ppb	Sensitive Groups: Children and people with asthma are the groups at most risk. Health Effects Statements: Greater likelihood of respiratory symptoms and breathing difficulty in active children and adults and people with respiratory disease, such as asthma; possible respiratory effects in general population. Cautionary Statements: Active children and adults, and people with respiratory disease, such as asthma, should limit prolonged outdoor exertion; everyone else, especially children, should limit prolonged outdoor exertion.
AQI 201-300: Very Unhealthy Ambient Ozone Concentrations: 106-200 ppb	Sensitive Groups: Children and people with asthma are the groups at most risk. Health Effects Statements: Increasingly severe symptoms and impaired breathing likely in active children and adults and people with respiratory disease, such as asthma; increasing likelihood of respiratory effects in general population. Cautionary Statements: Active children and adults, and people with respiratory disease, such as asthma, should avoid outdoor exertion; everyone else, especially children, should limit outdoor exertion.

An AQI of 50 and below is categorized as "Good" and air quality is satisfactory, and poses little or no risk. An AQI of 301 or higher is categorized as "Hazardous" having a health warning of emergency conditions: everyone is more likely to be affected. Outdoor activities should be avoided for all individuals.

AQI = Air quality index, ppb = parts per billion

Source: ARB 2018

Table 4. Air Quality Index Summary for Fine Particulate Matter & Related Health Effects

Air Quality Index / 8-hour Ozone Concentration	Health Effects Description
AQI 51-100: Moderate Ambient Concentrations: 12.1-35.4 µg/m³	Sensitive Groups: Some people who may be unusually sensitive to particulate. Health Effects Statements: Unusually sensitive people should consider reducing prolonged or heavy exertion. Cautionary Statements: Unusually sensitive people: Consider reducing prolonged or heavy exertion. Watch for symptoms such as coughing or shortness of breath. These are signs to take it easier.
AQI 101-150: Unhealthy for Sensitive Groups Ambient Concentrations: 35.5-55.4 µg/m³	Sensitive Groups: People with heart or lung disease, older adults, children, and teenagers. Health Effects Statements: Increasing likelihood of respiratory symptoms for sensitive individuals, aggravation of heart or lung disease, and premature mortality in persons with cardiopulmonary disease, and the elderly. Cautionary Statements: If you have heart disease: Symptoms such as palpations, shortness of breath, or unusual fatigue may indicate a serious problem. If you have any of these, contact a health care provider.
AQI 151–200: Unhealthy Ambient Concentrations: 55.5-150.4 µg/m³	Sensitive Groups: Everyone. Health Effects Statements: Increased aggravation of heart or lung disease and premature mortality in persons with cardiopulmonary disease, and the elderly; increased respiratory effects in general population. Cautionary Statements: Sensitive groups: Avoid prolonged or heavy exertion. Consider moving activities indoors or rescheduling. Everyone else: Reduce prolonged or heavy exertion. Take more breaks during outdoor activities.
AQI 201-300: Very Unhealthy Ambient Concentrations: 150.5-250.4 µg/m³	Sensitive Groups: Everyone. Health Effects Statements: Significant aggravation of heart or lung disease and premature mortality in persons with cardiopulmonary disease, and the elderly; significant increase in respiratory effects in general population. Cautionary Statements: Sensitive groups: Avoid all physical activity outdoors. Move activities indoors or reschedule to a time when air quality is better. Everyone else: Avoid prolonged or heavy exertion. Consider moving activities indoors or reschedule to a time when air quality is better.

An AQI of 50 and below is categorized as "Good" and air quality is satisfactory and poses little or no risk. An AQI of 301 or higher is categorized as "Hazardous" having a health warning of emergency conditions: everyone is more likely to be affected. Outdoor activities should be avoided for all individuals.

AQI = Air quality index, µg/m3 = micrograms per cubic meter

Source: ARB 2018

Table 5. Air Quality Index Annual Historical Summary

Year	Air Quality Index (AQI) - Number of Days					
	Good	Moderate	Unhealthy for Sensitive Groups	Unhealthy	Very Unhealthy	Hazardous
2023	207	152	6	0	0	0
2022	117	245	3	0	0	0
2021	154	203	8	0	0	0

Represents overall air quality taking into account all criteria pollutants measured.

Source: U.S, EPA 2023

Regulatory Framework

Air quality within the SCCAB is regulated by several jurisdictions including the U.S. EPA, ARB, and the SLOAPCD. Each of these jurisdictions develops rules, regulations, and policies to attain the goals or directives imposed upon them through legislation.

Federal

U.S. ENVIRONMENTAL PROTECTION AGENCY

At the federal level, the U.S. EPA has been charged with implementing national air quality programs. The U.S. EPA's air quality mandates are drawn primarily from the FCAA, which was signed into law in 1970. Congress substantially amended the FCAA in 1977 and again in 1990.

FEDERAL CLEAN AIR ACT

The FCAA required the U.S. EPA to establish NAAQS or National AAQS, and set deadlines for their attainment. Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. NAAQS are summarized in Table 6.

State

CALIFORNIA AIR RESOURCES BOARD

The ARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the CCAA of 1988. Other ARB duties include monitoring air quality (in conjunction with air monitoring networks maintained by air pollution control districts and air quality management districts, establishing California Ambient Air Quality Standards (CAAQS), which in many cases are more stringent than the NAAQS, and setting emissions standards for new motor vehicles. The CAAQS are summarized in Table 6. The emission standards established for motor vehicles differ depending on various factors including the model year, and the type of vehicle, fuel, and engine used.

CALIFORNIA CLEAN AIR ACT

The CCAA requires that all air districts in the state endeavor to achieve and maintain CAAQS for ozone, CO, sulfur dioxide (SO_2), and nitrogen dioxide (NO_2) by the earliest practicable date. The CCAA specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the act provides districts with authority to regulate indirect sources. Each district plan is required to either (1) achieve a five percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each non-attainment pollutant or its precursors, or (2) to provide for the implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both state and federal planning requirements.

ASSEMBLY BILLS 1807 & 2588 - TOXIC AIR CONTAMINANTS

Within California, TACs are regulated primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics Hot Spots Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for ARB to designate substances as TACs. This includes research, public participation, and scientific peer review before ARB designates a substance as a TAC. Existing sources of TACs that are subject to the Air Toxics Hot Spots Information and Assessment Act are required to: (1) prepare a toxic emissions inventory; (2) prepare a risk assessment if emissions are significant; (3) notify the public of significant risk levels; and (4) prepare and implement risk reduction measures.

IN-USE OFF-ROAD DIESEL VEHICLE REGULATION

On July 26, 2007, the ARB adopted a regulation to reduce DPM and oxides of nitrogen (NO_X) emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. The regulation applies to self-propelled diesel-fueled vehicles that cannot be registered and licensed to drive on-road, as well as two-engine vehicles that drive on road, with the limited exception of two-engine sweepers. Examples include loaders, crawler tractors, skid steers, backhoes, forklifts, airport ground support equipment, water well drilling rigs, and two-engine cranes. Such vehicles are used in construction, mining, and industrial operations. The regulation does not apply to stationary equipment or portable equipment such as generators. The off-road vehicle regulation establishes emissions performance requirements, reporting, disclosure, and labeling requirements for off-road vehicles, and limits unnecessary idling.

CALIFORNIA BUILDING CODE

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC is adopted every three years by the Building Standards Commission (BSC). In the interim, the BSC also adopts annual updates to make necessary mid-term corrections. The CBC standards apply statewide; however, a local jurisdiction may amend a CBC standard if it makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

GREEN BUILDING STANDARDS

In essence, green buildings standards are indistinguishable from any other building standards. Both standards are contained in the CBC and regulate the construction of new buildings and improvements. The only practical distinction between the two is that whereas the focus of traditional building standards has been protecting public health and safety, the focus of green building standards is to improve environmental performance.

AB 32, which mandates the reduction of GHG emissions in California to 1990 levels by 2020, increased the urgency around the adoption of green building standards. In its scoping plan for the implementation of AB 32, ARB identified energy use as the second largest contributor to California's GHG emissions, constituting roughly 25 percent of all such emissions. In recommending a green building strategy as one element of the scoping plan, ARB estimated that green building standards would reduce GHG emissions by approximately 26 million metric tons (MMT) of carbon dioxide equivalent (CO_2e) by 2020.

The May 2018 green buildings standards referred to as the 2019 Building Energy Efficiency Standards, focuses on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources. Under the standards, nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades. The recently updated 2019 Building Energy Efficiency Standards also require new homes built after January 1, 2020, to be equipped with solar photovoltaic (PV) systems. The solar PV systems are to be sized based on the building's annual electricity demand, the building's square footage, and the climate zone within which the home is located. However, under the 2019 Building Energy Efficiency Standards, homes may still rely on other energy sources, such as natural gas. Compliance with the 2019 Building Energy Efficiency Standards, including the solar PV system mandate, residential dwellings will use approximately 50 to 53 percent less energy than those under the 2016 standards. Actual reduction will vary depending on various factors (e.g., building orientation, sun exposure). Non-residential buildings will use about 30 percent less energy due mainly to lighting upgrades (CEC 2018).

The recently updated 2022 Building Energy Efficiency Standards (2022 Standards), which were approved in December 2021, encourage efficient electric heat pumps, establishes electric-ready requirements when natural gas is installed and to support the future installation of battery storage, and further expands solar photovoltaic and battery storage standards. The 2022 Standards extend solar PV system requirements, as well as battery storage capabilities for select land uses, including high-rise multi-family and non-residential land uses, such as office buildings, schools, restaurants, warehouses, theaters, grocery stores, and more. Depending on the land use and other factors, solar systems should be sized to meet targets of up to 60 percent of the structure's loads. These new solar requirements went into effect January 1, 2023, and contribute to California's goal of reaching net-zero carbon footprint by 2045 (CEC 2021).

Exhibit C

Table 6. Summary of Ambient Air Quality Standards & Attainment Designations

Pollutant	Averaging Time	California Standards****		Federal Standards****	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m³)	Non-Attainment	–	Non-Attainment Eastern SLO County - Attainment Western SLO County***
	8 Hour	0.070 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)******	
Respirable Particulate Matter (PM10)	24 Hour	50 µg/m³	Non-Attainment	150 µg/m³	Unclassified*/ Attainment
	Annual Arithmetic Mean	20 µg/m³		–	
Fine Particulate Matter (PM2.5)	24 Hour	No State Standard	Attainment	35 µg/m³	Unclassified*/ Attainment
	Annual Arithmetic Mean	12 µg/m³		12.0 µg/m³ *****	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m³)	Attainment	9 ppm (10 mg/m³)	Unclassified*
	1 Hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	Attainment	0.053 ppm (100 µg/m³)	Unclassified*
	1 Hour	0.18 ppm (330 µg/m³)		100 ppb (196 mg/m³)	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	–	Attainment	0.030 ppm (80 µg/m³)	Unclassified*
	24 Hour	0.04 ppm (105 µg/m³)		0.14 ppm (365 µg/m³)	
	3 Hour	–		0.5 ppm (1300 µg/m³)**	
	1 Hour	0.25 ppm (655 µg/m³)		75 ppb (196 mg/m³)	
Lead*	30 Day Average	1.5 µg/m³	Attainment	–	No Attainment Information
	Calendar Quarter	–		1.5 µg/m³	
	Rolling 3-Month Average*	–		0.15 µg/m³	
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.	Attainment	No Federal Standards	
Sulfates	24 Hour	25 µg/m³	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m³)	Attainment		
Vinyl Chloride*	24 Hour	0.01 ppm (26 µg/m³)	No Attainment Information		

* Unclassified (EPA/Federal definition): Any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for that pollutant. ** Secondary Standard

*** San Luis Obispo County has been designated non-attainment east of the -120.4 deg Longitude line, in areas of SLO County that are south of latitude 35.45 degrees, and east of the -120.3 degree Longitude line, in areas of SLO County that are north of latitude 35.45 degrees. Map of non-attainment area is available upon request from the APCD. **** For more information on standards visit:http//ww.arb.ca.gov.research/aaqs/aaqs2.pdf

Attainment (EPA/Federal definition): Any area that meets the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was not exceeded during a three year period. ***** Federal PM2.5 Secondary Standard is 15µg/m³

Non-Attainment (EPA/Federal definition): Any area that does not meet, or contributes to an area that does not meet the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was exceeded at least once during a three year period. ******The 2008 NAAQS for 8hr ozone is 0.075 ppm. The 2015 NAAQS for 8hr ozone is 0.070 ppm. The attainment status shown in this table relates to the 2008 and 2015 NAAQS. SLO County has been designated non-attainment of the 2015 NAAQS. NAAQS is National Ambient Air Quality Standards Revised January 29, 2019

Source: SLOAPCD 2019

Local

COUNTY OF SAN LUIS OBISPO AIR POLLUTION CONTROL DISTRICT

The SLOAPCD is the agency primarily responsible for ensuring that NAAQS and CAAQS are not exceeded and that air quality conditions within the region are maintained. Responsibilities of the SLOAPCD include but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by the FCAA and the CCAA.

CITY OF PASO ROBLES

The City's General Plan includes numerous policies related to air quality. These policies address emissions generated by mobile and non-mobile sources and land use compatibility. The General Plan includes the following policies related to air quality:

- *Circulation Element - Policy CE-1A*. Circulation Master Plan. Revise/update the City's Circulation Master Plan to address the mobility needs of all users of the streets, roads, and highways including motorists, movers of commercial goods, seniors, children, pedestrians, disabled persons, users of public transportation, and bicyclists.
- *Circulation Element - Policy CE-1B. Reduce Vehicle Miles Traveled (VMT). The City shall strive to reduce VMT generated per household per weekday by making efficient use of existing transportation facilities and by providing direct routes for pedestrians and bicyclists through the implementation of sustainable planning principles.*
- *Circulation Element - Policy CE-1C. Airport. Improve/expand transportation to and from the Paso Robles Municipal Airport as set forth in the Airport Master Plan*
- *Circulation Element - Policy CE-1D. Transit. Improve and expand transit services.*
- *Circulation Element - Policy CE-1E. Rail. Promote regional, interstate, and intra-state rail service.*
- *Circulation Element - Policy CE-1F. Pedestrian and Bicycle Access. Provide safe and convenient pedestrian and bicycle access to all areas of the City.*
- *Conservation Element - Policy C-2A. Traffic Congestion Reduction. Implement circulation systems improvements to reduce congestion and associated air contaminant emissions.*
- *Conservation Element - Policy C-2B. VMT Reduction. Implement programs to reduce the number of VMT, especially by single occupant vehicles, including providing opportunities for mixed-use projects.*
- *Conservation Element - Policy C-2C*. Emissions Reduction. Take steps to reduce creation of air contaminant emissions.

Impact Analysis

Thresholds of Significance

In accordance with Appendix G of the *California Environmental Quality Act (CEQA) Guidelines,* air quality impacts associated with the proposed project would be considered significant if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan.

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

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

To assist in the evaluation of air quality impacts, the SLOAPCD has developed recommended significance thresholds, which are contained in the SLOAPCD's *CEQA Air Quality Handbook* (2012). For the purposes of this analysis, project-generated emissions would be considered to have a potentially significant impact if any of the following SLOAPCD thresholds are exceeded:

Construction Impacts

The threshold criteria established by the SLOAPCD to determine the significance and appropriate mitigation level for a project's short-term construction emissions are presented in Table 7 and discussed, as follows (SLOAPCD 2012):

Table 7. SLOAPCD Thresholds of Significance for Project-Level Construction Impacts

Pollutant	Threshold[1]		
	Daily (lbs/day)	Quarterly Tier 1 (tons)	Quarterly Tier 2 (tons)
Ozone Precursors (ROG + NO_X)	137	2.5	6.3
Diesel Particulate Matter (DPM)	7	0.13	0.32
Fugitive Particulate Matter (PM_{10}), Dust[2]	--	2.5	--

1. Daily and quarterly emissions thresholds are based on the California Health & Safety Code and the ARB Carl Moyer Guidelines.
2. Any project with a grading area greater than 4.0 acres of a worked area can exceed the 2.5 tons PM10 quarterly threshold.
Source: SLOAPCD 2012

<u>ROG and NOx Emissions</u>

Daily: For construction projects exceeding the 137 lbs/day threshold require Standard Mitigation Measures.

Quarterly – Tier 1: For construction projects exceeding the 2.5 tons/quarter threshold, require Standard Mitigation Measures and Best Available Control Technology (BACT) for construction equipment. Off-site mitigation may be required if feasible mitigation measures are not implemented, or if no mitigation measures are feasible for the project.

Quarterly – Tier 2: For construction projects exceeding the 6.3 tons/quarter threshold, Standard Mitigation Measures, BACT, implementation of a Construction Activity Management Plan (CAMP), and off-site mitigation are required.

<u>DPM Emissions</u>

Daily: For construction projects exceeding the 7 lbs/day threshold, require Standard Mitigation Measures.

Quarterly - Tier 1: For construction projects lasting more than one quarter, exceedance of the 0.13 tons/quarter threshold requires Standard Mitigation Measures, BACT for construction equipment; and,

Quarterly - Tier 2: For construction projects exceeding the 0.32 tons/quarter threshold, require Standard Mitigation Measures, BACT, implementation of a CAMP, and off-site mitigation.

<u>Fugitive Particulate Matter (PM10), Dust Emissions</u>

Quarterly- Tier 1: For construction projects exceeding the 2.5 tons/quarter threshold require Fugitive PM_{10} dust Mitigation Measures and may require the implementation of a CAMP.

Operational Impacts

<u>Criteria Air Pollutants</u>

The threshold criteria established by the SLOAPCD to determine the significance and appropriate mitigation level for long-term operational emissions from a project are presented in Table 8.

For projects exceeding the 25 lbs/day operational ozone precursor threshold but not the corresponding 25 tons/year annual threshold, the project shall implement all applicable SLOAPCD-recommended mitigation measures. Off-site mitigation may be required for projects (exceeding the 25 lbs/day threshold) if all applicable SLOAPCD-recommended mitigation measures are not implemented, or if no mitigation measures are feasible for the project. Off-site mitigation is required for projects exceeding the 25 tons/year threshold (SLOAPCD 2017).

Table 8. SLOAPCD Thresholds of Significance for Project-Level Operational Impacts

Pollutant	Threshold[1]	
	Daily (lbs/day)	Annual (tons/year)
Ozone Precursors [reactive organic gas (ROG) + oxides of nitrogen (NO_X)]	25	25
Diesel Particulate Matter (DPM)[2]	1.25	--
Fugitive Particulate Matter (PM_{10}), Dust	25	25
Carbon Monoxide (CO)	550	--

1. *Daily and annual emissions thresholds are based on the California Health & Safety Code Division 26, Part 3, Chapter 10, Section 40918 and the ARB Carl Moyer Guidelines for DPM.*
2. *Applies to on-site emissions. DPM is seldom emitted from individual projects in quantities which lead to local or regional air quality attainment violations.*

Source: SLOAPCD 2012

Toxic Air Contaminants

If a project has the potential to emit toxic or hazardous air pollutants or is located in close proximity to sensitive receptors, impacts may be considered significant due to increased cancer risk for the affected population, even at a very low level of emissions. For the evaluation of new proposed land use projects that generate TACs, such as diesel-fueled engines, the SLOAPCD has defined the excess cancer risk significance threshold at 10 in a million.

Localized CO Concentrations

Localized CO concentrations associated with the proposed project would be considered a less-than-significant impact if: (1) Traffic generated by the proposed project would not result in deterioration of signalized intersection level of service (LOS) to LOS E or F; or (2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS of E or F (Caltrans 1996).

Odors

Screening of potential odor impacts is typically recommended for the following two situations:

- Projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate; and
- Residential or other sensitive receptor projects or other projects that may attract people locating near existing odor sources.

If the proposed project would locate receptors and known odor sources within one mile of each other, a full analysis of odor impacts is recommended. Known odor sources of primary concern, as identified by the SLOAPCD include landfills, transfer stations, asphalt batch plants, rendering plants, petroleum refineries, and painting/coating operations, as well as, composting, food processing, wastewater treatment, chemical manufacturing, and feedlot/dairy facilities.

Methodology

Emissions associated with the construction of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.29, computer program. Construction information, including construction phase durations, area of disturbance, and area to be paved was based on project-specific information provided. No existing structure would be demolished. Additional construction information such as off-road equipment use, worker vehicle trips, and equipment load factors were based on default parameters contained in the model for San Luis Obispo County. Modeling assumptions and output files are included in Appendix A of this report.

Long-term operational emissions were calculated using the CalEEMod, version 2022.1.1.29 based, in part, on vehicle trip-generation rates derived from the traffic analysis prepared for this project (CCTC 2025). Vehicle travel distribution/distances were not available and were based on model defaults for San Luis Obispo County. Energy-saving features included as part of the proposed project were also included in the emissions modeling. Based on project-specific information provided, the project would include the installation of a solar photovoltaic (PV) energy system, which is estimated to provide approximately 1,267,700 kWh/year. The project would also include the use of low-flow inline drip irrigation systems with "smart" controllers and flow sensors, which would reduce water use and associated electrical usage. The project would also include the installation of energy-efficient appliances and lighting, per current building code requirements. Emission modeling files are provided in Appendix A.

Project Impacts and Mitigation Measures

Impact AQ-A. Conflict with or obstruct implementation of the applicable air quality plan?

SLOAPCD Clean Air Plan

As part of the CCAA, the SLOAPCD is required to develop a plan to achieve and maintain the state ozone standard by the earliest practicable date. The SLOAPCD's 2001 Clean Air Plan addresses the attainment and maintenance of state and federal ambient air quality standards. The Clean Air Plan was adopted by SLOAPCD on March 26, 2002.

The SLOAPCD's Clean Air Plan outlines the District's strategies to reduce ozone-precursor pollutants [i.e., reactive organic gas (ROG) and NO_X] from a wide variety of sources. The SLOAPCD's Clean Air Plan includes a stationary-source control program, which includes control measures for permitted stationary sources; as well as transportation and land use management strategies to reduce motor vehicle emissions and use. The stationary-source control program is administered by SLOAPCD. Transportation and land use control measures are implemented at the local or regional level, by promoting and facilitating the use of alternative transportation options, increased pedestrian access and accessibility to community services and local destinations, reductions in VMT, and promotion of congestion management efforts. In addition, local jurisdictions also prepare population forecasts, which are used by SLOAPCD to forecast population-related emissions and air quality attainment, including those contained in the SLOAPCD's Clean Air Plan. As a result, consistency with the SLOAPCD's Clean Air Plan has been evaluated based on the proposed project's consistency with the land use management strategies and transportation control measures identified in the Clean Air Plan. This analysis also provides an analysis of regional vehicle miles traveled (VMT) and consistency with regional VMT-reduction efforts. Regional VMT estimates are relied upon for regional air quality planning purposes. Regional VMT and growth projections are used to determine the strategies to be implemented sufficient to reach the emission reduction targets set by the ARB through Senate Bill (SB) 375 which is transportation legislation that supports the broader 2030 emission reduction targets required in SB 32.

Transportation and Land Use Control Measures

The SLOAPCD's Clean Air Plan includes multiple transportation and land use control measures intended to reduce emissions through reductions in VMT and the promotion of alternative forms of transportation. Implementation of the proposed project would not result in increases in regional VMT. The proposed project would include pedestrian and bicycle improvements (CCTC 2025). In addition, Mitigation Measure GHG-1c would require CALGreen Tier 2 compliant electric vehicle (EV) charging stations to be "EV Ready" as opposed to "EV Capable". These improvements would help to promote the use of alternative means of transportation, including the installation of alternative fueled vehicle infrastructure and bicycle use.

Projected Population, Employment & VMT Growth

According to the Regional Housing Needs Assessment, the City has about 14 percent more housing units than jobs, indicative of a "jobs-poor" community. The City's jobs-to-housing ratio is estimated to improve from a year 2015 ratio of 0.87 to a 0.89 jobs-housing ratio by the year 2035 (SLOCOG 2019). The proposed project would result in increased employment and would not result in additional housing units. As a result, the proposed project would be anticipated to improve the jobs-housing balance.

For the reasons noted above, this impact would be considered ***less than significant***.

Particulate Matter Report – Implementation of SB 656 Requirements

In July 2005, SLOAPCD adopted the *Particulate Matter Report* (PM Report). The PM Report identifies various measures and strategies to reduce public exposure to PM emitted from a wide variety of sources, including emissions from permitted stationary sources and fugitive sources, such as construction activities. As discussed in Impact AQ-B, uncontrolled fugitive dust generated during construction may result in localized pollutant concentrations that may result in increased nuisance concerns to nearby land uses. Therefore, construction-generated emissions of PM would be considered to have a ***potentially-significant impact*** with regard to air quality planning efforts.

Mitigation Measures

Implement Mitigation Measures AQ-1 through AQ-2 (refer to Impact AQ-B).

Significance After Mitigation

Implementation of Mitigation Measures AQ-1 and AQ-2 would include measures to reduce construction-generated emissions. Together these measures would help to reduce PM emissions and provide consistency with SLOAPCD's airborne PM-reduction efforts. With mitigation, this impact would be considered ***less than significant.***

Impact AQ-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?

Short-term Construction Emissions

Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to represent a significant air quality impact. Construction of the proposed project would result in the temporary generation of emissions associated with clearing, site prep, grading, building construction, paving, motor vehicle exhaust associated with construction equipment, and worker trips, as well as the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO_X) and emissions of PM. Emissions of ozone-precursors would result from the operation of on- and off-road motorized vehicles and equipment. Emissions of airborne PM are largely dependent on the amount of ground disturbance associated with site preparation activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses.

Estimated maximum daily and quarterly emissions associated with the construction of the proposed project are presented in Table 9 and Table 10, respectively. Construction-generated emissions were compared to SLOAPCD's recommended significance thresholds (Daily, Quarterly Tier 1, and Quarterly Tier 2). As depicted in Table 9, the maximum daily emissions associated with project construction would total approximately 50.9 lbs/day of ROG+NO_X and 0.7 lbs/day of $PM_{2.5}$ exhaust. As depicted in Table 10, maximum quarterly construction-generated emissions would total approximately 2.7 tons/quarter of ROG+NO_X, 0.3 tons/quarter of fugitive PM_{10} dust, and <0.1 tons/quarter of $PM_{2.5}$ exhaust. A summary of unmitigated construction-generated emissions in comparison to SLOAPCD-recommended significance thresholds is provided in Table 11.

Maximum daily construction emissions would not exceed SLOAPCD's daily significance threshold. However, maximum quarterly construction emissions are predicted to exceed SLOAPCD's quarterly significance threshold. Emissions would be largely a result of mobile-source emissions associated with construction vehicle and equipment operations anticipated to occur during the grading. If uncontrolled, fugitive dust generated during construction may also result in localized pollutant concentrations that could exceed ambient air quality standards and result in increased nuisance concerns to nearby land uses. For this reason, construction-generated emissions would be considered to have a ***potentially-significant impact.***

Table 9. Daily Construction Emissions without Mitigation

Construction Activity	Maximum Daily Emissions (lbs/day)[(1)]									
	ROG	NO_X	ROG+NO_X	CO	PM_{10}			$PM_{2.5}$		
					Exhaust	Dust	Total	Exhaust	Dust	Total
Site Preparation	3.23	30.54	33.78	29.79	1.26	24.00	25.25	1.16	10.59	11.75
Grading	1.73	16.30	18.03	18.35	0.66	11.41	12.07	0.61	3.91	4.52
Construction-2026	1.38	11.04	12.42	15.64	0.39	0.61	1.00	0.36	0.15	0.51
Construction-2027	1.34	10.51	11.85	15.44	0.35	0.61	0.96	0.32	0.15	0.47
Architectural Coating	28.97	0.89	29.86	1.60	0.02	0.09	0.11	0.02	0.02	0.04
Paving	1.33	7.28	8.60	10.50	0.30	0.14	0.45	0.28	0.04	0.31
Maximum Daily Emissions [(2)]	31.7	19.2	50.9	27.7	0.7	0.8	1.6	0.7	0.2	0.9
SLOAPCD Daily Thresholds (pounds/day)	--	--	**137**	--	--	--	--	**7**	--	--
Exceed SLOAPCD Thresholds?	--	--	No	--	--	--	--	No	--	--

1. Emissions were quantified using the CalEEMod, v2022.1.1.29., computer program.
2. Maximum daily emissions assumes building construction, paving, and application of architectural coatings could potentially occur on the same day.
lbs/day = pounds per day; ROG =Reactive Organic Gases; NO_X = oxides of nitrogen; CO = carbon monoxide.
PM_{10} = respirable particulate matter (10 micrometers or less); $PM_{2.5}$ = respirable particulate matter (2.5 micrometers or less)
Refer to Appendix A for emissions modeling assumptions and results.

Table 10. Quarterly Construction Emissions without Mitigation

Construction Quarter	Maximum Quarterly Emissions (tons)[(1)]								
	ROG	NOx	ROG+NO_X	PM_{10}[2]			$PM_{2.5}$		
				Exhaust	Dust	Total	Exhaust	Dust	Total
Quarter 1	0.06	0.51	0.57	0.02	0.25	0.27	0.02	0.10	0.12
Quarter 2	0.20	0.36	0.56	0.01	0.02	0.03	0.01	0.01	0.02
Quarter 3	1.81	0.70	2.51	0.02	0.04	0.06	0.02	0.01	0.03
Quarter 4	1.97	0.76	2.73	0.03	0.05	0.08	0.02	0.01	0.03
Quarter 5	0.33	0.11	0.44	<0.01	<0.01	0.01	<0.01	<0.01	<0.01
Maximum Quarterly Emissions:	--	--	2.7	--	0.3	--	0.02	--	--
SLOAPCD Quarterly Tier 1/Tier 2 Thresholds (tons/quarter)	--	--	**2.5/6.3**	--	**2.5/None**	--	**0.13/0.32**	--	--
Exceed SLOAPCD Tier 1/Tier 2 Thresholds?	--	--	**Yes**/No	--	No/--	--	No/No	--	--

Maximum Quarterly Emissions: Based on construction schedule information provided and default assumptions contained in the CalEEMod computer model. Totals may not sum due to rounding. Refer to Appendix A for modeling assumptions and results.
1. Maximum quarterly emissions include on-site and off-site emissions.

Table 11. Summary of Construction Emissions without Mitigation

Criteria	Project Emissions (lbs/day)	SLOAPCD Significance Threshold		Exceeds Significance Threshold?	
Maximum Daily Emissions of ROG+NO_X	50.9	137 lbs/day		No	
Maximum Daily Emissions of $PM_{2.5}$ Exhaust	0.7	7 lbs/day		No	
	(tons/quarter)	**Tier 1**	**Tier 2**	**Tier 1**	**Tier 2**
Maximum Quarterly Emissions of ROG+NO_X	2.7	2.5 tons/quarter	6.3 tons/quarter	**Yes**	No
Maximum Quarterly Emissions of PM_{10} Dust	0.3	2.5 tons/quarter	None	No	No
Maximum Quarterly Emissions of $PM_{2.5}$ Exhaust	0.02	0.13 tons/quarter	0.32 tons/quarter	No	No
Refer to Appendix A for modeling assumptions and results.					

Mitigation Measures

AQ-1: The following mitigation measures shall be implemented to reduce construction-generated fugitive dust. These measures shall be shown on grading and building plans.

a. Reduce the amount of disturbed areas where possible.
b. Use water trucks, SLOAPCD-approved dust suppressants (see Section 4.3 in the CEQA Air Quality Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the District's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of an APCD-approved dust suppressant where possible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the CEQA Air Quality Handbook.
c. All dirt stockpile areas should be sprayed daily or covered with tarps or other dust barriers as needed.
d. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
e. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code (CVC) Section 23114.
f. "Track-Out" is defined as sand or soil that adheres to and/or agglomerates on the exterior surfaces of motor vehicles and/or equipment (including tires) that may then fall onto any highway or street as described in CVC Section 23113 and California Water Code 13304. To prevent 'track out', designate access points and require all employees, subcontractors, and others to use them. Install and operate a 'track-out prevention device' where vehicles enter and exit unpaved roads onto paved streets. The 'track-out prevention device' can be any device or combination of devices that are effective at preventing track out, located at the point of intersection of an unpaved area and a paved road. Rumble strips or steel plate devices need periodic cleaning to be effective. If paved roadways accumulate tracked out soils, the track-out prevention device may need to be modified.
g. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities.
h. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.
i. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.
j. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where possible. Roads shall be pre-wetted prior to sweeping when possible.
l. The burning of vegetative material shall be prohibited. Effective February 25, 2000, SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County. If you have any questions regarding these requirements, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent the transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork, or demolition.

AQ-2: The following measures shall be implemented to reduce construction emissions from on and off-road construction equipment (NOx, ROG, and DPM) and area sources. These measures shall be shown on grading and building plans:

a. Maintain all construction equipment in proper tune according to manufacturer's specifications.
b. Fuel all off-road and portable diesel-powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).
c. To the extent locally available, heavy-duty (50 horsepower or greater) diesel-fueled, off-road construction equipment shall meet Tier 4 emissions standards.
d. When applicable, portable equipment, 50 horsepower (hp) or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the California Air Resources Board) or be permitted by the APCD. Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g, aggregate plant, asphalt plant, concrete plant). For more information, contact the SLOAPCD Engineering & Compliance Division at (805) 781-5912.
e. Use on-road heavy-duty trucks that meet the ARB's 2010 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation.
f. All on and off-road diesel equipment shall not idle when not in use. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit.
g. Construction equipment staging areas shall be located at the furthest distance possible from nearby residential land uses.
h. To the extent locally available, electrified, or alternatively powered construction equipment shall be used.
i. Substitute gasoline-powered in place of diesel-powered equipment, where possible; and,
j. Use alternative-fueled construction equipment on-site where possible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.
k. Construction of the proposed project shall use low-VOC content paints not exceeding 50 grams per liter.
l. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.
m. Meet or exceed Cal Green Tier 2 standards for reducing cement use in concrete mix as allowed by local ordinance and conditions.

Significance After Mitigation

Implementation of Mitigation Measures AQ-1 and AQ-2 include SLOAPCD-recommended standard and best available control measures to reduce construction-generated emissions of fugitive dust, mobile-source emissions associated with construction vehicles and equipment, and evaporative emissions from architectural coasting (e.g. low VOC-emission paint). Mitigated quarterly construction emissions are presented in Table 12. With mitigation, project-generated construction emissions would not exceed applicable significance thresholds and would be considered ***less than significant.***

Exhibit C

Table 12. Quarterly Construction Emissions with Mitigation

Construction Quarter	Maximum Quarterly Emissions (tons)[(1)]								
	ROG	NOx	ROG+NOx	PM_{10}[2]			$PM_{2.5}$		
				Exhaust	Dust	Total	Exhaust	Dust	Total
Quarter 1	0.02	0.13	0.15	<0.01	0.08	0.08	<0.01	0.03	0.03
Quarter 2	0.18	0.14	0.32	<0.01	0.02	0.02	<0.01	0.01	0.01
Quarter 3	1.77	0.29	2.06	0.01	0.04	0.05	0.01	0.01	0.02
Quarter 4	1.93	0.32	2.25	0.01	0.05	0.06	0.01	0.01	0.02
Quarter 5	0.32	0.04	0.36	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Maximum Quarterly Emissions:	--	--	2.3	--	0.1	--	0.01	--	--
SLOAPCD Quarterly Tier 1/Tier 2 Thresholds (tons/quarter)	--	--	**2.5/6.3**	--	**2.5/None**	--	**0.13/0.32**	--	--
Exceed SLOAPCD Tier 1/Tier 2 Thresholds?	--	--	No/No	--	No/--	--	No/No	--	--

Maximum Quarterly Emissions: Based on construction schedule information provided and default assumptions contained in the CalEEMod computer model. Totals may not sum due to rounding. Refer to Appendix A for modeling assumptions and results.

1. *Maximum quarterly emissions include on-site and off-site emissions.*
2. *Includes use of dust control measures, Tier 4 heavy-duty off-road equipment, and low-VOC paints.*

Long-term Operational Emissions

Long-term operational emissions associated with the proposed project would be predominantly associated with mobile sources and area sources, such as landscape maintenance activities.

Unmitigated operational emissions associated with the proposed project are summarized in Table 13. As depicted, daily operational emissions would total approximately 15.6 lbs/day of ROG+NO_X, 31.2 lbs/day of CO, 3.6 lbs/day of fugitive PM_{10} dust, and 0.3 lbs/day of $PM_{2.5}$ exhaust. Annual operational emissions would total approximately 2.7 tons/year of ROG+NO_x and 0.6 tons/year of fugitive PM_{10} dust. Predicted operational emissions would exceed SLOAPCD's recommended ROG+NO_x threshold. As a result, this impact would be considered ***potentially significant.***

Health Effects of Project-Generated Regional Emissions

Project-generated emissions are evaluated based on the pollutants' potential to affect local or regional air quality. As noted earlier in this report, regional pollutants of concern typically include ozone and particulate matter. Whereas, for development projects, localized pollutants of primary concern often include carbon monoxide, TACs, as well as airborne particulates. The health effects of these pollutants are discussed earlier in this report and summarized in Table 1.

For localized pollutants, health impacts can be evaluated using screening criteria or through dispersion modeling. However, for regional pollutants such as ozone, the change in health effects associated with an individual project is a secondary pollutant created by NO_X and ROG (also commonly referred to as VOCs). As previously discussed earlier in this report, ozone is not a directly emitted pollutant. NO_X and ROG are not criteria air pollutants but, when in the presence of sunlight, they can form ozone and also contribute to the formation of secondary $PM_{2.5}$. Because ozone is not a directly emitted pollutant and is created under specific meteorological conditions over a wide transport area, ozone concentrations are typically evaluated at a regional level using complex photochemical models. These models are capable of predicting concentrations that take into account variations in amounts of precursor emissions (e.g., ROG, NO_X), temperature, inversions, sunlight, hourly variations, ambient conditions, and wind flow over long distances (e.g., miles). At the project level of analysis, evaluation of ozone concentrations is "not practicable and not likely [to] yield valid information" (SJVAPCD 2015).

Of the criteria pollutants identified, ozone and $PM_{2.5}$ have the most critical health effects. As a result, concentrations of these pollutants are typically relied upon for determining public health effects. In comparison to modeled regional emissions, the emissions associated with most individual projects would be negligible and too small to produce a measurable change in regional ozone or $PM_{2.5}$ concentrations or associated public health effects. In addition, the Sacramento Metropolitan Air Quality Management District (SMAQMD) has recently conducted regional emissions modeling analyses using a chemical transport model to evaluate changes in emissions and associated health effects associated with an individual project. The modeling was based on very conservative assumptions representative of the largest projects, which assumed up to approximately eight times the threshold of significance (up to 656 lbs/day) of NO_X, ROG, and PM. This level of emissions would be more representative of large community plan projects. Based on the modeling conducted by SMAQMD, even these large projects would have "low overall health effects" (SMAQMD 2020).

It is important to reiterate that the health effects of criteria air pollutants are taken into consideration when the U.S., EPA establishes the NAAQS for individual pollutants. The health effects of a particular pollutant are analyzed on a regional basis based on the area's attainment of the NAAQS. As previously discussed in this report, the AQI is one common method of evaluating public health impacts for criteria air pollutants of primary concern. Local air districts establish significance thresholds that are based on the evaluation of an individual project's contribution to regional air quality conditions and associated health effects. Based on the above discussion and given that project-generated criteria pollutants would exceed applicable significance thresholds, Project-generated emissions of regional criteria pollutants (e.g., ROG, NO_X, PM) could have an effect on public health. Refer to Impact AQ-C for a discussion of localized air quality impacts.

Table 13. Operational Emissions without Mitigation

Operational Source	Emissions[1]									
	ROG	NO_X	ROG+NO_X	CO	PM_{10}			PM2.5		
					Exhaust	Dust	Total	Exhaust	Dust	Total
Daily Emissions (lbs/day)										
Mobile[2]	5.56	2.80	8.36	21.8	0.04	3.61	3.65	0.04	0.92	0.96
Area	5.57	0.07	5.64	8.07	0.01	>0.01	0.01	0.11	>0.01	0.11
Energy[3]	0.08	1.47	1.55	1.24	0.11	>0.01	0.11	0.11	>0.01	0.11
Total Daily Emissions:	11.2	4.4	15.6	31.2	0.2	3.6	3.8	0.3	0.9	1.1
SLOAPCD Significance Thresholds	**--**	**--**	**25**	**550**	**--**	**25**	**--**	**1.25**	**--**	**--**
Exceeds SLOAPCD Thresholds?	--	--	No	No	--	No	--	No	--	--
Annual Emissions (tons/year)										
Total Annual Emissions[4]:	2.0	0.8	2.8	5.5	0.03	0.6	0.6	0.03	0.2	0.2
SLOAPCD Significance Thresholds	**--**	**--**	**25**	**--**	**--**	**25**	**--**	**--**	**--**	**--**
Exceeds SLOAPCD Thresholds?	--	--	No	--	--	No	--	--	--	--

Note: Based on operational year 2025. Totals may not sum due to rounding. Refer to Appendix A for modeling output files and assumptions.

1. *Daily emissions are based on the worst case between summer and winter buildout operational conditions.*
2. *Mobile emissions were based on trip-generation rates derived from the traffic analysis prepared for this project and CalEEMod default fleet mix and trip distances.*
3. *Includes consistency with current building standards related to the use of energy-efficient mechanical equipment/appliances and water-efficient irrigation systems.*
4. *Annual emissions were derived from the CalEEMod modeling.*

Impact AQ-C. Expose sensitive receptors to substantial pollutant concentrations?

The proposed project would not result in the installation of any equipment or processes that would be considered a major emission source. However, the proposed project would result in localized increases in pollutant concentrations during project construction. The proposed project's potential contribution to localized air pollutants is discussed, as follows:

Short-Term Construction Activities

Naturally-Occurring Asbestos

NOA has been identified as a TAC by the ARB. In accordance with ARB's Air Toxics Control Measure (ATCM), prior to any grading activities, a geologic evaluation should be conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request form, along with a copy of the geologic report, must be filed with the SLOAPCD. If NOA is found at the site, the applicant must comply with all requirements outlined in the Asbestos ATCM (SLOAPCD 2018).

Based on a review of the SLOAPCD's map depicting potential areas of NOA, the project site is not located in or near an area that has been identified as having a potential for NOA. As a result, this impact would be considered ***less than significant***.

Localized Construction PM Concentrations

Fugitive dust emissions would be primarily associated with site preparation, grading, and vehicle travel on unpaved and paved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of DPM, which could contribute to elevated localized concentration at nearby receptors. Uncontrolled emissions of fugitive dust may also contribute to potential increases in nuisance impacts to nearby receptors. Short-term exposure to airborne particulates can result in irritation of the eyes and the respiratory system and may affect sensitive individuals, including those suffering from asthma and other medical conditions. For these reasons, localized uncontrolled concentrations of construction-generated PM would be considered to have a ***potentially-significant impact.***

Mitigation Measures

Implement Mitigation Measures AQ-1 and AQ-2.

Significance After Mitigation

With the implementation of Mitigation Measures AQ-1 and AQ-2 construction-related emissions of PM would be substantially reduced. With mitigation, short-term exposure to localized pollutants would be considered to have a ***less-than-significant impact.***

Impact AQ-D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose members of the public to objectionable odors would be deemed to have a significant impact.

The proposed project would not result in the installation of any equipment or processes that would be considered major odor-emission sources. In addition, no known odor sources are within one mile of the project site. However, construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly with increasing distance from the source. Mitigation measures, such as the implementation of idling restrictions for construction equipment and vehicles and the use of newer, cleaner equipment and vehicles would further reduce construction-generated emissions. For these reasons, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. For these reasons, potential exposure of sensitive receptors to odorous emissions would be considered ***less than significant***.

GREENHOUSE GASES AND CLIMATE CHANGE

Existing Setting

To fully understand global climate change, it is important to recognize the naturally occurring "greenhouse effect" and to define the GHGs that contribute to this phenomenon. Various gases in the earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the Earth's atmosphere from space and a portion of the radiation is absorbed by the Earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Primary GHGs attributed to global climate change, are discussed, as follows:

- **Carbon Dioxide**. Carbon dioxide (CO_2) is a colorless, odorless gas. CO_2 is emitted in a number of ways, both naturally and through human activities. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO_2 emissions. The atmospheric lifetime of CO_2 is variable because it is so readily exchanged in the atmosphere (U.S. EPA 2018).

- **Methane**. Methane (CH_4) is a colorless, odorless gas that is not flammable under most circumstances. CH_4 is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (enteric fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH_4 into the atmosphere. Natural sources of methane include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. Methane's atmospheric lifetime is about 12 years (U.S. EPA 2018).

- **Nitrous Oxide**. Nitrous oxide (N_2O) is a clear, colorless gas with a slightly sweet odor. N_2O is produced by both natural and human-related sources. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, acid production, and nitric acid production. N_2O is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 114 years (U.S. EPA 2018).

- **Hydrofluorocarbons.** Hydrofluorocarbons (HFCs) are man-made chemicals, many of which have been developed as alternatives to ozone-depleting substances for industrial, commercial, and consumer products. The only significant emissions of HFCs before 1990 were of the chemical HFC-23, which is generated as a byproduct of the production of HCFC-22 (or Freon 22, used in air conditioning applications). The atmospheric lifetime for HFCs varies from just over a year for HFC-152a to 270 years for HFC-23. Most of the commercially used HFCs have atmospheric lifetimes of less than 15 years (e.g., HFC-134a, which is used in automobile air conditioning and refrigeration, has an atmospheric life of 14 years) (U.S. EPA 2018).

- **Perfluorocarbons.** Perfluorocarbons (PFCs) are colorless, highly dense, chemically inert, and non-toxic. There are seven PFC gases: perfluoromethane (CF_4), perfluoroethane (C_2F_6), perfluoropropane (C_3F_8), perfluorobutane (C_4F_{10}), perfluorocyclobutane (C_4F_8), perfluoropentane (C_5F_{12}), and perfluorohexane (C_6F_{14}). Natural geological emissions have been responsible for the PFCs that have accumulated in the atmosphere in the past; however, the largest current source is aluminum production, which releases CF_4 and C_2F_6 as byproducts. The estimated atmospheric lifetimes for PFCs ranges from 2,600 to 50,000 years (U.S. EPA 2018).

- **Nitrogen Trifluoride**. Nitrogen trifluoride (NF_3) is an inorganic, colorless, odorless, toxic, nonflammable gas used as an etchant in microelectronics. NF_3 is predominantly employed in the cleaning of the plasma-enhanced chemical vapor deposition chambers in the production of liquid crystal displays and silicon-based thin-film solar cells. It has a global warming potential of 16,100 CO_2e. While NF_3 may have a lower global warming potential than other chemical etchants, it is still a potent GHG. In 2009, NF_3 was listed by California as a high (global warming potential) GWP GHG to be listed and regulated under AB 32 (Section 38505 Health and Safety Code).

- **Sulfur Hexafluoride**. Sulfur hexafluoride (SF_6) is an inorganic compound that is colorless, odorless, non-toxic, and generally non-flammable. SF_6 is primarily used as an electrical insulator in high-voltage equipment. The electric power industry uses roughly 80 percent of all SF_6 produced worldwide. Leaks of SF_6 occur from aging equipment and during equipment maintenance and servicing. SF_6 has an atmospheric life of 3,200 years (U.S. EPA 2018).

- **Black Carbon**. Black carbon is the strongest light-absorbing component of PM emitted from burning fuels such as coal, diesel, and biomass. Black carbon contributes to climate change both directly by absorbing sunlight and indirectly by depositing on snow and by interacting with clouds and affecting cloud formation. Black carbon is considered a short-lived species, which can vary spatially and, consequently, it is very difficult to quantify associated global warming potentials. The main sources of black carbon in California are wildfires, off-road vehicles (locomotives, marine vessels, tractors, excavators, dozers, etc.), on-road vehicles (cars, trucks, and buses), fireplaces, agricultural waste burning, and prescribed burning (planned burns of forest or wildlands) (U.S. EPA 2018).

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Often, estimates of GHG emissions are presented in CO_2e, which weighs each gas by its global warming potential (GWP). Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. Table 14 provides a summary of the GWP for GHG emissions of typical concern with regard to community development projects, based on a 100-year time horizon. As indicated, Methane traps over 25 times more heat per molecule than CO_2, and N_2O absorbs roughly 298 times more heat per molecule than CO_2. Additional GHGs with high GWP include NF_3, SF_6, PFCs, and black carbon.

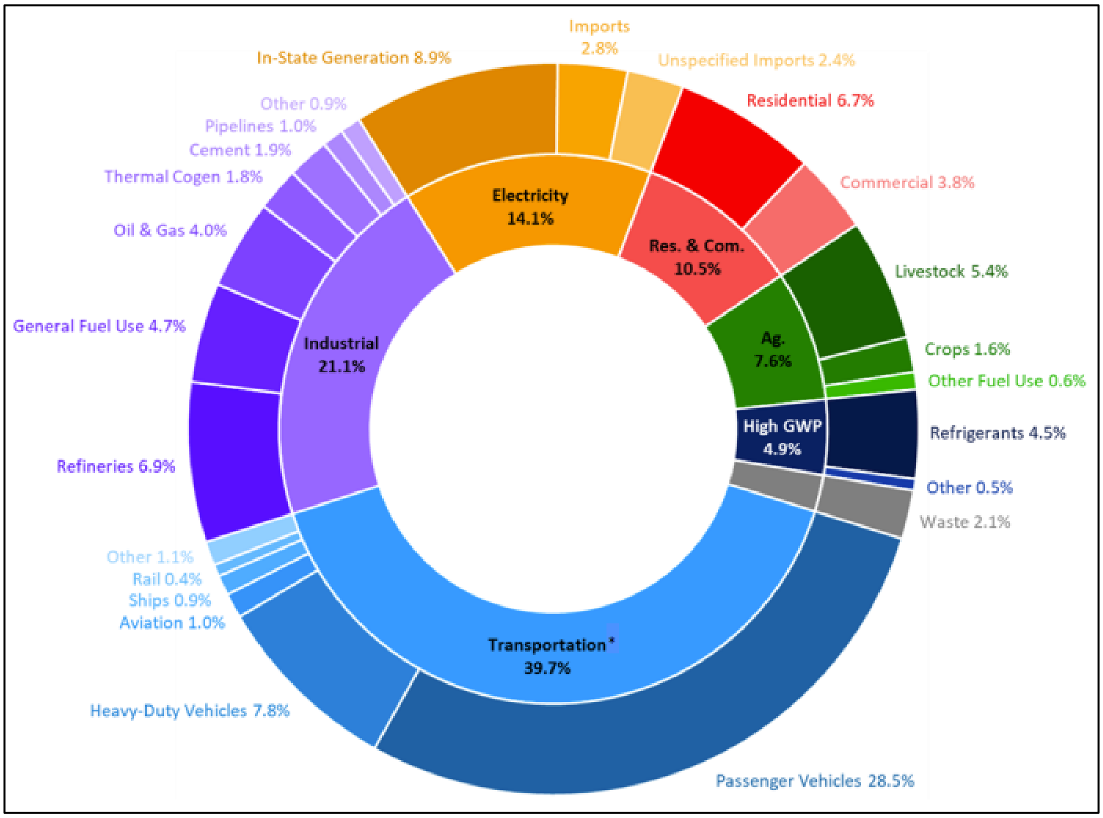
Table 14. Global Warming Potential for Greenhouse Gases

Greenhouse Gas	Global Warming Potential (100-year)
Carbon Dioxide (CO_2)	1
Methane (CH_4)	25
Nitrous Dioxide (N_2O)	298
Based on IPCC GWP values for 100-year time horizon. *Source: IPCC 2007*	

Statewide GHG Emissions

In 2019, GHG emissions within California totaled 418.1 MMT of CO_2e. GHG emissions, by sector, are summarized in Figure 3. Within California, the transportation sector is the largest contributor, accounting for approximately 39.7 percent of the total state-wide GHG emissions. Emissions associated with industrial uses are the second-largest contributor, totaling roughly 21.1 percent. Electricity generation totaled roughly 14.1 percent. Other major emission sources included commercial uses, residential uses, agriculture, refrigerants, and waste (ARB 2021).

Figure 3. California GHG Emissions Inventory by Sector & Subsector (2019)



Source: ARB 2021

City of Paso Robles GHG Emissions Inventories

The City has completed a community-wide inventory of GHG emissions for the years 2005 and 2020, which are summarized in Table 15. As shown, a majority of the City's emissions are associated with mobile sources. Remaining GHG emissions are predominantly associated with energy use and solid waste generation. In comparison to year 2005 community-wide emissions, year 2016 metric tons (MT)CO_2e emissions decreased by a total of approximately 20 percent (City of Paso Robles 2013).

Table 15. City of Paso Robles GHG Emissions Inventories

Sector	Year 2005 (MTCO_2e)	Year 2020 (MTCO_2e)	Percent Change from 2005 to 2020
Residential	40,188	46,828	17%
Commercial/Industrial	33,536	30,551	-9%
Transportation	67,801	92,913	37%
Off-Road	13,205	15,878	20%
Solid Waste	13,343	16,653	17%
Wastewater	70	82	17%
Aircraft	1,324	1,543	17%
Total	**169,557**	**203,448**	**20%**

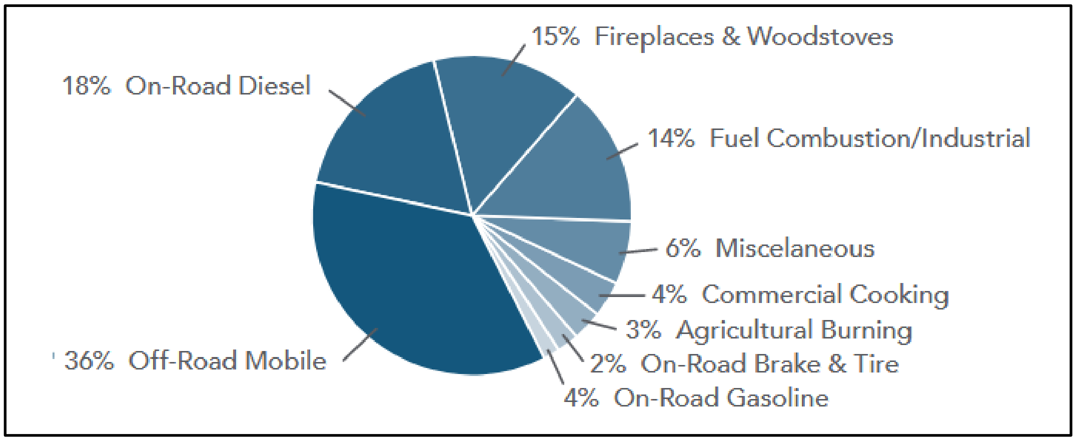
MTCO_2e = Metric tons of carbon dioxide equivalent
Source: City of Paso Robles Climate Action Plan 2013

Short-Lived Climate Pollutants

Short-lived climate pollutants (SLCPs), such as black carbon, fluorinated gases, and methane also have a dramatic effect on climate change. Though short-lived, these pollutants create a warming influence on the climate that is many times more potent than that of carbon dioxide.

As part of the ARB's efforts to address SLCPs, the ARB has developed a statewide emission inventory for black carbon. The black carbon inventory will help support the implementation of the SLCP Strategy, but it is not part of the State's GHG Inventory that tracks progress towards the State's climate targets. The most recent inventory for year 2013 conditions is depicted in Figure 4. As depicted, off-road mobile sources account for a majority of black carbon emissions totaling roughly 36 percent of the inventory. Other major anthropogenic sources of black carbon include on-road transportation, residential wood burning, fuel combustion, and industrial processes (ARB 2020).

Figure 4. California Black Carbon Emissions Inventory (Year 2013)



Source: ARB 2020

Effects of Global Climate Change

There are uncertainties as to exactly what the climate changes will be in various local areas of the earth. There are also uncertainties associated with the magnitude and timing of other consequences of a warmer planet: sea-level rise, the spread of certain diseases out of their usual geographic range, the effect on agricultural production, water supply, sustainability of ecosystems, increased strength and frequency of storms, extreme heat events, increased air pollution episodes, and the consequence of these effects on the economy.

Within California, climate changes would likely alter the ecological characteristics of many ecosystems throughout the state. Such alterations would likely include increases in surface temperatures and changes in the form, timing, and intensity of precipitation. For instance, historical records depict an increasing trend toward earlier snowmelt in the Sierra Nevada. This snowpack is a principal supply of water for the state, providing roughly 50 percent of the state's annual runoff. If this trend continues, some areas of the state may experience an increased danger of floods during the winter months and possible exhaustion of the snowpack during the spring and summer months. Earlier snowmelt would also impact the State's energy resources. Currently, approximately 20 percent of California's electricity comes from hydropower. Early exhaustion of the Sierra snowpack may force electricity producers to switch to more costly or non-renewable forms of electricity generation during the spring and summer months. A changing climate may also impact agricultural crop yields, coastal structures, and biodiversity. As a result, changes in climate will likely have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry.

Regulatory Framework

Federal

EXECUTIVE ORDER 13514

Executive Order (EO) 13514 is focused on reducing GHGs internally in federal agency missions, programs, and operations. In addition, the executive order directs federal agencies to participate in the Interagency Climate Change Adaptation Task Force, which is engaged in developing a national strategy for adaptation to climate change.

On April 2, 2007, in Massachusetts v. U.S. EPA, 549 U.S. 497 (2007), the Supreme Court found that GHGs are air pollutants covered by the FCAA, and that the U.S. EPA has the authority to regulate GHG. The Court held that the U.S. EPA Administrator must determine whether or not emissions of GHGs from new motor vehicles cause or contribute to air pollution which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision.

On December 7, 2009, the U.S. EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the Clean Air Act:

- Endangerment Finding: The Administrator found that the current and projected concentrations of the six key well-mixed GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The Administrator found that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare.

Although these findings did not themselves impose any requirements on industry or other entities, this action was a prerequisite to finalizing the U.S. EPA's Proposed Greenhouse Gas Emission Standards for Light-Duty Vehicles, which was published on September 15, 2009. On May 7, 2010, the final Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards were published in the Federal Register.

The U.S. EPA and the National Highway Traffic Safety Administration (NHTSA) are taking coordinated steps to enable the production of a new generation of clean vehicles with reduced GHG emissions and improved fuel efficiency from on-road vehicles and engines. These next steps include developing the first-ever GHG regulations for heavy-duty engines and vehicles, as well as additional light-duty vehicle GHG regulations. These steps were outlined by President Obama in a Presidential Memorandum on May 21, 2010.

The final combined U.S. EPA and NHTSA standards that make up the first phase of this national program apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The standards require these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile (the equivalent to 35.5 miles per gallon if the automobile industry were to meet this CO_2 level solely through fuel economy improvements). Together, these standards will cut GHG emissions by an estimated 960 MMT and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012-2016). On August 28, 2012, U.S. EPA and NHTSA issued their joint rule to extend this national program of coordinated GHG and fuel economy standards to model years 2017 through 2025 passenger vehicles.

State

EXECUTIVE ORDER NO. S-3-05

EO S-3-05 (State of California) proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emission targets. Specifically, emissions are to be reduced to the 2000 level by 2010, to the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

The EO directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The secretary will also submit biannual reports to the governor and state legislature describing (1) progress made toward reaching the emission targets, (2) impacts of global warming on California's resources, and (3) mitigation and adaptation plans to combat these impacts. To comply with the EO, the secretary of CalEPA created a Climate Action Team made up of members from various state agencies and commissions. The Climate Action Team released its first report in March 2006 and continues to release periodic reports on progress. The report proposed to achieve the targets by building on voluntary actions of California businesses, local government, and community actions, as well as through state incentives and regulatory programs.

ASSEMBLY BILL 32 - CALIFORNIA GLOBAL WARMING SOLUTIONS ACT OF 2006

AB 32 (Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561–38565, 38570, 38571, 38574, 38580, 38590, 38592–38599) requires that statewide GHG emissions be reduced to 1990 levels by the year 2020. The gases that are regulated by AB 32 include CO_2, CH_4, N_2O, HFCs, PFCs, NF_3, and SF_6. The reduction to 1990 levels will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs ARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then ARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that ARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap, institute a schedule to meet the emissions cap, and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

CLIMATE CHANGE SCOPING PLAN

In October 2008, ARB published its *Climate Change Proposed Scoping Plan*, which is the State's plan to achieve GHG reductions in California required by AB 32. This initial Scoping Plan contained the main strategies to be implemented in order to achieve the target emission levels identified in AB 32. The Scoping Plan included ARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The largest proposed GHG reduction recommendations were associated with improving emissions standards for light-duty vehicles, implementing the Low Carbon Fuel Standard program, implementing energy efficiency measures in buildings and appliances, the widespread development of combined heat and power systems, and developing a renewable portfolio standard for electricity production.

The Scoping Plan states that land use planning and urban growth decisions will play important roles in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions. ARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emissions sectors. With regard to land use planning, the Scoping Plan expects approximately 5.0 MMT CO_2e will be achieved associated with the implementation of SB 375, which is discussed further below.

The initial Scoping Plan was first approved by ARB on December 11, 2008, and is updated every five years. The first update of the Scoping Plan was approved by the ARB on May 22, 2014, which looked past 2020 to set mid-term goals (2030-2035) on the road to reaching the 2050 goals. The *2017 Climate Change Scoping Plan*, was released in November 2017. The *2017 Climate Change Scoping Plan* incorporates strategies for achieving the 2030 GHG-reduction target established in SB 32 and EO B-30-15. Most notably, the *2017 Climate Change Scoping Plan* encourages zero net increases in GHG emissions. However, the *2017 Climate Change Scoping Plan* recognizes that achieving net zero increases in GHG emissions may not be possible or appropriate for all projects and that the inability of a project to mitigate its GHG emissions to zero would not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA.

On November 16, 2022, the ARB approved the *2022 Scoping Plan for Achieving Carbon Neutrality*. The 2022 Scoping Plan continues the path to achieve the SB 32 2030 target and expands upon earlier plans by targeting an 85 percent reduction in GHG below 1990 levels by 2045 (ARB 2022).

SENATE BILL 1078 AND GOVERNOR'S ORDER S-14-08

SB 1078 (Public Utilities Code Sections 387, 390.1, 399.25, and Article 16) addresses electricity supply and requires that retail sellers of electricity, including investor-owned utilities and community choice aggregators, provide a minimum of 20 percent of their supply from renewable sources by 2017. This Senate Bill will affect statewide GHG emissions associated with electricity generation. In 2008, Governor Schwarzenegger signed EO S-14-08, which set the Renewables Portfolio Standard target to 33 percent by 2020. It directed state government agencies and retail sellers of electricity to take all appropriate actions to implement this target. EO S-14-08 was later superseded by EO S-21-09 on September 15, 2009. EO S-21-09 directed the ARB to adopt regulations requiring 33 percent of electricity sold in the State to come from renewable energy by 2020. Statute SB X1-2 superseded this EO in 2011, which obligated all California electricity providers, including investor-owned utilities and publicly owned utilities, to obtain at least 33 percent of their energy from renewable electrical generation facilities by 2020.

ARB is required by current law, AB 32 of 2006, to regulate sources of GHGs to meet a state goal of reducing GHG emissions to 1990 levels by 2020 and an 80 percent reduction of 1990 levels by 2050. The California Energy Commission and California Public Utilities Commission serve in advisory roles to help ARB develop the regulations to administer the 33 percent by 2020 requirement. ARB is also authorized to increase the target and accelerate and expand the time frame.

MANDATORY REPORTING OF GHG EMISSIONS

The California Global Warming Solutions Act (AB 32, 2006) requires the reporting of GHGs by major sources to the ARB. Major sources required to report GHG emissions include industrial facilities, suppliers of transportation fuels, natural gas, natural gas liquids, liquefied petroleum gas, and CO_2, operators of petroleum and natural gas systems, and electricity retail providers and marketers.

CAP-AND-TRADE REGULATION

The cap-and-trade regulation is a key element in California's climate plan. It sets a statewide limit on sources responsible for 85 percent of California's GHG emissions and establishes a price signal needed to drive long-term investment in cleaner fuels and more efficient use of energy. The cap-and-trade rules came into effect on January 1, 2013, and apply to large electric power plants and large industrial plants. In 2015, fuel distributors, including distributors of heating and transportation fuels, also became subject to the cap-and-trade rules. At that stage, the program will encompass around 360 businesses throughout California and nearly 85 percent of the state's total GHG emissions.

Under the cap-and-trade regulation, companies must hold enough emission allowances to cover their emissions and are free to buy and sell allowances on the open market. California held its first auction of GHG allowances on November 14, 2012. California's GHG cap-and-trade system is projected to reduce GHG emissions to 1990 levels by the year 2020 and would achieve an approximate 80 percent reduction from 1990 levels by 2050.

SENATE BILL 32

SB 32 was signed by Governor Brown on September 8, 2016. SB 32 effectively extends California's GHG emission-reduction goals from year 2020 to year 2030. This new emission-reduction target of 40 percent below 1990 levels by 2030 is intended to promote further GHG-reductions in support of the State's ultimate goal of reducing GHG emissions by 80 percent below 1990 levels by 2050. SB 32 also directs the ARB to update the Climate Change Scoping Plan to address this interim 2030 emission-reduction target.

SENATE BILL 97

SB 97 was enacted in 2007. SB 97 required the Office of Planning and Research (OPR) to develop, and the Natural Resources Agency to adopt, amendments to the CEQA Guidelines addressing the analysis and mitigation of GHG emissions. Those CEQA Guidelines amendments clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects and must reach a conclusion regarding the significance of those emissions.
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions.
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change.
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria.
- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply, and ways to reduce energy demand, including through the use of efficient transportation alternatives.

As part of the administrative rulemaking process, the California Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010.

SENATE BILL 100

SB 100 was signed by Governor Jerry Brown on September 10, 2018. SB 100 sets a goal of phasing out all fossil fuels from the state's electricity sector by 2045. SB 100 increases to 60 percent, from 50 percent, how much of California's electricity portfolio must come from renewables by 2030. It establishes a further goal to have an electric grid that is entirely powered by clean energy by 2045, which could include other carbon-free sources, like nuclear power, that are not renewable.

SENATE BILL 375

SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will address land-use allocation in that MPOs regional transportation plan. ARB, in consultation with MPOs, establishes regional reduction targets for GHGs emitted by passenger cars and light trucks for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. ARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, funding for transportation projects may be withheld. In 2018, ARB adopted updated SB 375 targets.

SENATE BILLS 1383 & 1206

SB 1383 requires California to reduce hydrofluorocarbon (HFC) emissions associated with the use of refrigerants to 40 percent below 2013 levels by 2030. Starting in 2022, new facilities will be required to use refrigerants that can reduce their emissions by up to 90 percent. The intent of the new rules is to eliminate the use of very high-GWP refrigerants in every sector that uses non-residential refrigeration systems. Compliance begins for most home air conditioning equipment in 2025. Senate Bill 1206, signed into law in September 2022, prohibits the sale or distribution of HFCs that exceed a specified GWP. Under this new law, refrigerants would not be allowed to exceed 2,200 GWP beginning January 1, 2025; 1,500 GWP beginning January 1, 2030; and 750 GWP beginning January 1, 2030. California Building Code

The CBC contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The California Building Code is adopted every three years by the Building Standards Commission (BSC). In the interim, the BSC also adopts annual updates to make necessary mid-term corrections. The CBC standards apply statewide; however, a local jurisdiction may amend a CBC standard if it makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

CALIFORNIA GREEN BUILDING STANDARDS

In essence, the green building standards are indistinguishable from any other building standards, are contained in the CBC, and regulate the construction of new buildings and improvements. Whereas the focus of traditional building standards has been protecting public health and safety, the focus of green building standards is to improve environmental performance.

The 2019 Building Energy Efficiency Standards (2019 Standards), adopted in May 2018, addressed four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. The 2019 Standards required new residential and non-residential construction; as well as major alterations to existing structures, to include EV-capable parking spaces which have electrical panel capacity and conduit to accommodate future installation. In addition, the 2019 Standards also required the installation of PV systems for low-rise residential dwellings, defined as single-family dwellings and multi-family dwellings up to three stories in height. These requirements are based on various factors, including the floor area of the home, sun exposure, and climate zone. Under the 2019 standards, nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades (CEC 2019).

The recently updated 2022 Building Energy Efficiency Standards (2022 Standards), which were approved in December 2021, encourage efficient electric heat pumps, establish electric-ready requirements when natural gas is installed and support the future installation of battery storage, and further expands solar photovoltaic and battery storage standards. The 2022 Standards extend solar PV system requirements, as well as battery storage capabilities for select land uses, including high-rise multi-family and non-residential land uses, such as office buildings, schools, restaurants, warehouses, theaters, grocery stores, and more. Depending on the land use and other factors, solar systems should be sized to meet targets of up to 60 percent of the structure's loads. These new solar requirements will become effective January 1, 2023, and contribute to California's goal of reaching net-zero carbon footprint by 2045 (CEC 2021).

SHORT-LIVED CLIMATE POLLUTANT REDUCTION STRATEGY

In March 2017, the ARB adopted the *Short-Lived Climate Pollutant Reduction Strategy* (*SLCP Strategy*) establishing a path to decrease GHG emissions and displace fossil-based natural gas use. Strategies include avoiding landfill methane emissions by reducing the disposal of organics through edible food recovery, composting, in-vessel digestion, and other processes; and recovering methane from wastewater treatment facilities, and manure methane at dairies, and using the methane as a renewable source of natural gas to fuel vehicles or generate electricity. The *SLCP Strategy* also identifies steps to reduce natural gas leaks from oil and gas wells, pipelines, valves, and pumps to improve safety, avoid energy losses, and reduce methane emissions associated with natural gas use. Lastly, the *SLCP Strategy* also identifies measures that can reduce HFC emissions at national and international levels, in addition to State-level action that includes an incentive program to encourage the use of low-GWP refrigerants and limitations on the use of high-GWP refrigerants in new refrigeration and air-conditioning equipment (ARB 2020).

San Luis Obispo County Air Pollution Control District

SLOAPCD is a local public agency with the primary mission of realizing and preserving clean air for all county residents and businesses. Responsibilities of the SLOAPCD include but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by federal and state regulatory requirements.

City Of Paso Robles Climate Action Plan

The City's Climate Action Plan is a long-range plan to reduce GHG emissions from City government operations and community activities. The Climate Action Plan will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, and supporting local economic development. The Climate Action Plan includes measures to reduce community-wide GHG emissions by 15 percent below 2005 levels by 2020 (City of Paso Robles 2013).

County of San Luis Obispo 2023 Regional Transportation Plan/Sustainable Communities Strategy

The 2023 RTP was adopted by the SLOCOG Board in June 2023. The RTP includes the region's SCS, which outlines how the region will exceed its GHG reduction targets as required by SB 375 through the promotion of a variety of transportation demand management & system management tools and techniques to maximize the efficiency of the transportation network. Consistency with the requirement of SB 375 ensures consistency with the GHG-reduction targets set by ARB. The 2023 SCS was found to be consistent with the requirement of SB 375 and is also consistent with the general plans of the region’s jurisdictions (SLOCOG 2023).

Impact Analysis

Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines,* increased GHG emissions associated with the implementation of the proposed project would be considered significant if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

In accordance with SLOAPCD recommendations, the proposed project would be considered to be consistent with the State’s carbon neutrality goals and would be considered to have a less-than-significant impact if: 1) the project is deemed consistent with regional VMT-reduction targets; 2) the project incorporates best management practices (BMPs) to support the State’s GHG-reduction efforts; and 3) the project would not result in a wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

The SLOAPCD has not identified recommended BMPs for development projects. However, other air districts in the State have recently released BMP-related guidance for the evaluation of GHG impacts. For instance, the Bay Area Air Quality Management District (BAAQMD) has recently released recommended GHG significance thresholds that are based on a “fair share” approach for achieving carbon neutrality goals and to ensure consistency with the State’s GHG-reduction efforts, including the State’s Climate Change Scoping Plan. Accordingly, the BAAQMD recommends that the installation of natural gas infrastructure for development projects be prohibited to the extent that alternatively powered options are available. Similarly, the SMAQMD has also recently released BMPs, which also discourage the installation of natural gas infrastructure for development projects as well as a requirement that projects meet current CalGreen Tier 2 standards for electric-vehicle (EV) spaces, except that EV-capable spaces shall instead be EV ready. This additional requirement requires the installation of electrical infrastructure sufficient to service the future installation of EV chargers. The BAAQMD and SMAQMD thresholds are based on an approach endorsed by the Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015). Although not located within these jurisdictions, development in San Luis Obispo County and associated GHG emissions are comparable to those generated by developments within other areas of the state, including the BAAQMD and SMAQMD jurisdictions. Given that climate change is inherently a cumulative impact that occurs on a global scale, these BMPs would, likewise, be considered representative of the project’s “fair share” of what would be required to meet the State’s long-term climate goals, including achieving carbon neutrality by 2045 and ensuring consistency with the State’s Climate Change Scoping Plan. It is also important to note that the CARB 2022 Scoping Plan states that under the Lead Agencies discretion with supporting evidence projects that incorporate some but not all key attributes could be found by the lead agency as being consistent with the State’s Scoping Plan. Project-related operational GHG impacts were assessed based on consistency with applicable GHG reduction plans. Refer to Appendix A for emissions modeling assumptions and results.

Methodology

Emissions associated with the construction of the proposed project were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.29, computer program. Construction information, including construction phase durations, area of disturbance, and area to be paved was based on project-specific information provided. No existing structure would be demolished. Additional construction information such as off-road equipment use, worker vehicle trips, and equipment load factors were based on default parameters contained in the model for San Luis Obispo County. Modeling assumptions and output files are included in Appendix A of this report.

Long-term operational emissions were calculated using the CalEEMod, version 2022.1.1.29 based, in part, on vehicle trip-generation rates derived from the traffic analysis prepared for this project (CCTC 2025). Vehicle travel distribution/distances were not available and were based on model defaults for San Luis Obispo County. Energy-saving features included as part of the proposed project were also included in the emissions modeling. Based on project-specific information provided, the project would include the installation of a solar photovoltaic (PV) energy system, which is estimated to provide approximately 1,267,700 kWh/year. The project would also include the use of low-flow inline drip irrigation systems with "smart" controllers and flow sensors, which would reduce water use and associated electrical usage. The project would also include the installation of energy-efficient appliances and lighting, per current building code requirements. Emission modeling files are provided in Appendix A.

Project Impacts and Mitigation Measures

Impact GHG-A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? or Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas?

Estimated GHG emissions attributable to future development would be primarily associated with increases in CO_2 from mobile sources. To a lesser extent, other GHG pollutants, such as CH_4 and N_2O, would also be generated. Short-term and long-term GHG emissions associated with the development of the proposed project are discussed in greater detail, as follows:

Short-term Construction GHG Emissions

Estimated increases in GHG emissions associated with the construction of the proposed project are summarized in Table 16. Based on the modeling conducted, construction-related GHG emissions would total approximately 469 $MTCO_2e$. Amortized GHG emissions, when averaged over the assumed 30-year minimum life of the project, would total approximately 15.6 $MTCO_2e$/year. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Actual emissions may vary, depending on the final construction schedules, equipment required, and activities conducted. Amortized construction-generated GHG emissions are included in the operational GHG emissions impact discussion provided below.

Table 16. Construction-Generated GHG Emissions

Construction Year	GHG Emissions ($MTCO_2e$/Year)
2026	357
2027	112
Total Construction Emissions:	469
Amortized Construction Emissions:	15.6
Amortized emissions are quantified based on a minimum 30-year project life. Refer to Appendix A for modeling assumptions and results.	

Long-term Operational GHG Emissions

For informational purposes, estimated long-term increases in operational GHG emissions associated with the proposed project are summarized in Table 17. As depicted, operational GHG emissions for the proposed project, with the inclusion of amortized construction GHGs, would total approximately 1,197 $MTCO_2e$/year under opening year 2028 conditions. A majority of the operational GHG emissions would be associated with motor vehicle use and energy use. To a lesser extent, operational GHG emissions would also be associated with solid waste generation and water use. Operational GHG emissions would be projected to gradually decrease in future years, due largely to anticipated improvements in mobile-source fuel-efficiency rates.

Table 17. Operational GHG Emissions

Operational Year/Source	GHG Emissions ($MTCO_2e$/Year)
Mobile(1)	634.0
Area Source(2)	5.0
Energy(3)	457
Water(3)	15.9
Waste	30.7
Refrigerant(4)	39.2
Amortized Construction Emissions:	15.6
Total Emissions:	1,197

1. *Based on default fleet mix for land uses contained in CalEEMod for San Luis Obispo County. Based on opening year 2028 conditions.*
2. *Area sources include emissions associated primarily with consumer products and the use of landscape maintenance equipment.*
3. *Includes use of energy-efficient appliances, low-flow water fixtures and water-efficient irrigation systems, per current building code requirements.*
4. *Reduced service leak emissions.*

Refer to Appendix A for modeling assumptions and results.

Consistency With Applicable Plans

As noted in Table 20, operational GHG emissions attributable to the proposed project would be primarily associated with energy use, refrigerant emissions, and mobile sources. Applicable GHG-reduction plans related to reducing operational GHG emissions are the *County of San Luis Obispo's Regional Transportation Plan/Sustainable Communities Strategy*, ARB's *2022 Climate Change Scoping Plan*, and the *City of Paso Robles CAP*. The project's consistency with these plans is discussed in greater detail, as follows:

City of Paso Robles Climate Action Plan

The City's Climate Action Plan is a long-range plan to reduce GHG emissions from City government operations and community activities within the community. The City's Climate Action Plan includes numerous measures to reduce GHG emissions associated with energy use, motor vehicle use, water use, waste generation, and construction. It is important to note, however, that the City's Climate Action Plan is based on the year 2020 GHG-reduction targets and has not yet been updated to reflect year 2030 GHG-reduction targets, per SB 32. Nonetheless, a summary of the proposed project's consistency with the measures identified in the City's Climate Action Plan are summarized in Table 18. As noted, and with the implementation of proposed mitigation measures, the project would be consistent with the GHG-reduction measures identified in the City's currently adopted Climate Action Plan (City of Paso Robles 2013).

County of San Luis Obispo 2023 Regional Transportation Plan/Sustainable Communities Strategy

The 2023 RTP was adopted by the SLOCOG Board in June 2023. The RTP includes the region's SCS, which outlines how the region will meet or exceed its GHG reduction targets as required by SB 375 through the promotion of a variety of transportation demand management & system management tools and techniques to maximize the efficiency of the transportation network. Consistency with the requirement of SB 375 ensures consistency with the GHG-reduction targets set by ARB. The 2023 SCS was found to be consistent with the requirement of SB 375 and is also consistent with the general plans of the region's jurisdictions (SLOCOG 2023). Based on the traffic analysis prepared for the project, the project would result in a reduction in regional VMT (CCTC 2025). As a result, the project would be consistent with regional VMT-reduction efforts.

Exhibit C

Table 18. Project Consistency with the City's Climate Action Plan

Climate Action Plan Measures	Project Consistency
Energy Measures	
Does the project exclusively include "All-electric buildings"?	**Consistent with Mitigation**. A mitigation measure has been included to encourage the installation of electrically-powered appliances in place of natural gas to the extent possible. Where natural gas service for equipment is required, electrical service to the equipment shall also be required to promote the future conversion from natural gas to electrical service (refer to Mitigation Measure GHG-1a). The proposed project includes the installation of solar photovoltaic systems and installation of energy-efficient appliances and lighting, per building code requirements. The project would comply with the City's Energy Reach code requirements.
If the project/plan includes a new mixed-fuel building or buildings (plumbed for the use of natural gas as fuel for space heating, water heating, cooking, or clothes drying appliances) does that building/those buildings exceed the City's Energy Reach code?	
Transportation and Land Use Measures	
Does the project comply with requirements in the City's Municipal Code with no exceptions, including bicycle parking, bikeway design, and EV charging stations?	**Consistent**. The project includes bicycle parking and EV charging stations in accordance with building requirements.
Is the estimated project-generated VMT within the City's adopted thresholds, as confirmed by the City's Transportation Division?	**Consistent**. Based on the traffic analysis prepared for this project, the project would result in a reduction in reginal VMT. Project-generated VMT would, therefore, not exceed the City's adopted VMT thresholds.
If "No", does the project/plan include VMT mitigation strategies and/or a Transportation Demand Management (TDM) Plan approved by the City's Transportation Division?	
Does the project demonstrate consistency with the City's Bicycle Network Plan?	**Consistent**. The project would include improvements to nearby bicycle and pedestrian facilities (CCTC 2025). The project would, therefore, not conflict with the City's Bicycle Network Plan.
Off-Road Measure	
Will the project work to reduce GHG emissions by reducing off-road equipment and vehicle usage and idling?	**Consistent with Mitigation**. Mitigation measures have been included to require the project to restrict idling and vehicle usage when feasible and to use alternatively-powered equipment where possible during construction (refer to Mitigation Measure AQ-2).
Water Measure	
Does the project comply with water efficiency and conservation requirements?	**Consistent**. The project includes the use of low-flow water fixtures, water-efficient irrigation systems, and drought-tolerant landscaping in accordance with building requirements.
Waste Measure	
Does the project include an operational commitment to reduce the amount of trash and other waste and recycle as many materials as possible?	**Consistent.** The project would be required to provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services (refer to Mitigation Measure GHG-1b).
Tree Planting Measure	
Does the project include an operational commitment to maintain a healthy urban forest and incorporate native drought-tolerant trees?	**Consistent**. The project would comply with the City's Water Efficient Landscape Ordinance and includes the installation of drought tolerant landscaping.

California's 2022 Climate Change Scoping Plan

The previously adopted 2017 Climate Change Scoping Plan incorporated the State's GHG emissions reduction target of 40 percent below 1990 emissions levels by 2030, as mandated by SB 32. On November 16, 2022, the ARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality. The recently adopted 2022 Scoping Plan continues the path to achieve the SB 32 2030 target and expands upon earlier Scoping Plans by targeting an 85 percent reduction in GHG below 1990 levels by 2045. A significant part of achieving the SB 32 goals are strategies to promote sustainable communities, such as the promotion of zero net energy buildings, and improved transportation choices that result in reducing VMT. Other measures include the increased use of low-carbon fuels and cleaner vehicles (ARB 2022).

For land use development projects, additional reductions in GHG emissions may be required in order to meet the project's fair share of the statewide reductions required to achieve carbon neutrality, consistent with EO B-55-18 and ARB's Draft 2022 Scoping Plan Update. Neither the SLOAPCD nor the City have developed recommended thresholds of significance that are based on achieving carbon neutrality by the year 2045. However, the Bay Area Air Quality Management District (BAAQMD) has recently released recommended GHG significance thresholds that are based on a "fair share" approach for achieving carbon neutrality goals. Consistent with this approach, new land use development projects would be considered to be consistent with the State's carbon neutrality goals and would be considered to have a less-than-significant impact if: 1) the project is deemed consistent with regional VMT-reduction targets; 2) the project prohibits the installation of natural gas infrastructure (to the extent that alternative power sources are available); and 3) the project would not result in a wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. Similarly, the SMAQMD has also recently released Best Management Practices (BMPs), which also include the prohibited installation of natural gas infrastructure for development projects, as well as a requirement that projects meet current CALGreen Tier 2 standards for EV spaces, except that *EV-capable* spaces shall instead be *EV ready*. This additional requirement requires the installation of electrical infrastructure sufficient to service the future installation of EV chargers. The BAAQMD and SMAQMD thresholds are based on an approach endorsed by the Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015). Although not located within these jurisdictions, development in San Luis Obispo County and associated GHG emissions are comparable to those generated by developments within other areas of the state, including the BAAQMD and SMAQMD jurisdictions. Given that climate change is inherently a cumulative impact that occurs on a global scale, these BMPs would, likewise, be considered representative of the project's "fair share" of what would be required to meet the State's long-term climate goals, including achieving carbon neutrality by 2045, as identified by the BAAQMD and the SMAQMD.

As noted above, the proposed project would result in an overall reduction in regional VMT and, therefore, would not conflict with regional VMT-reduction targets. However, the proposed project does not include BMPs that would constitute its "fair share" of what would be required to meet the State's long-term climate goals, including achieving carbon neutrality by 2045. Specifically, the project does not prohibit the installation of natural gas-fueled appliances/equipment, nor require that current CALGreen Tier 2 compliant EV spaces be *EV Ready*, as opposed to *EV Capable*. As a result, this impact would be considered **potentially significant**.

<u>Mitigation Measures</u>

Implement Mitigation Measure AQ-2 and the following:

GHG-1: The project shall include the following measures:

a. CALGreen Tier 2 compliant electric vehicle (EV) charging stations shall be "EV Ready" as opposed to "EV Capable".

b. Install electrically powered appliances and building mechanical equipment in place of natural-gas-fueled equipment. If natural gas equipment is to be installed, the following shall be implemented: (1) Install electrical service to the natural gas equipment location sufficient to allow for the future conversion from natural gas to electrical service; (2) A Greenhouse Gas (GHG) Reduction Plan shall be prepared for the proposed project. The GHG Reduction Plan shall include a menu of all possible onsite GHG reduction measures sufficient to offset operational natural-gas source emissions. In the event that the City of Paso Robles (City) adopts an updated Climate Action Plan or the San Luis Obispo County Air Pollution Control District (SLOAPCD) releases updated recommended GHG significance thresholds that address future-year GHG emissions reductions, the GHG-Reduction Plan may be evaluated in comparison to the GHG thresholds and reduction measures identified in the Climate Action Plan or those identified by the SLOAPCD and adjusted in order for the project to be in compliance with the Climate Action Plan. The GHG Reduction plan shall be approved by the City prior to issuance of building construction permits.

Under California Environmental Quality Act Guidelines Section 15126.4(c)(3) and (c)(4), respectively, a project's GHG emissions may also be reduced by offsite measures, including offsets that are not otherwise required by existing regulations and measures that sequester GHGs. In the event that feasible onsite GHG-reduction measures are insufficient to offset operational natural-gas source GHG emissions, offsite mitigation measures may be included to the extent feasible. Offsite mitigation measures may include "Direct Reduction Activities" located in the City of Paso Robles or the SLOAPCD jurisdictional areas. "Direct Reduction Activities" means undertaking or funding activities that will reduce or sequester GHG emissions. GHG reduction credits shall achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, and enforceable. GHG reduction credits shall be undertaken for the specific purpose of reducing project-generated GHG emissions and shall not include reductions that would otherwise be required by law. All Direct Reduction Activities and associated reduction credits shall be confirmed by an independent, qualified third-party air consultant retained by the Applicant.

c. The project shall provide organic waste pick up and shall provide the appropriate on-site enclosures consistent with the provisions of the City of Paso Robles Development Standards for Solid Waste Services.

Significance After Mitigation

Implementation of Mitigation Measures AQ-2 and GHG-1 would reduce project-generated GHG emissions to ensure consistency with future year 2030 GHG-reduction targets. With mitigation, the project would be considered consistent with the regional GHG-reduction planning efforts, which have been deemed consistent with State-wide GHG-reduction planning efforts.

Mitigation Measure GHG-1a would require the installation of EV-ready parking spaces in support of the State's carbon neutrality goals. With regard to CALGreen EV parking requirements, "EV Capable" is defined as including the installation of a "raceway" (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate future installation of a dedicated branch circuit and charging station(s). "EV Ready" includes "EV Capable" requirements plus the addition of dedicated branch circuit(s) (electrical pre-wiring), circuit breakers, and other electrical components, including a receptacle (240-volt outlet) or blank cover needed to support future installation of one or more charging stations. Mitigation has also been included to promote the use of electrically powered appliances/equipment (as opposed to natural gas-fueled appliances/equipment) and to reduce waste per applicable City development standards. In the event that natural-gas appliances/equipment are installed, Mitigation Measure GHG-1b would require the project to implement additional GHG emission reduction measures sufficient to offset any GHG increases associated with the use of natural gas in the event that natural gas appliances/equipment is to be installed. Implementation of Mitigation Measure GHG-1c would help to reduce GHG emissions associated with waste generation and Mitigation Measures AQ-2 would help to reduce GHG emissions associated with construction-related activities, including short-lived climate pollutants, such as black carbon. With mitigation, the project would be considered consistent with the local, regional, and state GHG-reduction planning efforts. With mitigation, this impact would be considered ***less than significant.***

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APPENDIX A

EMISSIONS MODELING & SUPPORTIVE DOCUMENTATION

Exhibit C

TYPES OF EV-CHARGING SPACES

Currently, there are three different types of EV charging spaces: *EV Capable, EV Ready,* and *EV Installed*. Each of these vary depending on the state of completion of an EV charging station.

EV Capable
A vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways, both underground and/or surface mounted, to support EV charging

EV Ready
A vehicle space which is provided with a branch circuit; any necessary raceways, both underground and/or surface mounted; to accommodate EV charging, terminating in a receptacle or a charger.

EV Installed
Includes the installation of the infrastructure, as noted above for "EV Ready", and the EV charging station.

Exhibit C

Ayres Resort Expansion Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Ayres Resort Expansion
Construction Start Date	2/17/2026
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.00
Precipitation (days)	0.20
Location	35.64841193637051, -120.67048201594922
County	San Luis Obispo
City	Paso Robles
Air District	San Luis Obispo County APCD
Air Basin	South Central Coast
TAZ	3307
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Hotel	100	Room	3.33	145,200	23,661	—	—	—

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Quality Restaurant	6.00	1000sqft	0.14	6,000	23,661	—	—	—
Junior College (2yr)	16.5	1000sqft	0.38	16,500	23,661	23,661	—	—
General Office Building	17.9	1000sqft	0.41	17,950	23,661	—	—	—
Parking Lot	4.00	Acre	4.00	0.00	23,661	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Energy	E-2	Require Energy Efficient Appliances
Energy	E-10-B	Establish Onsite Renewable Energy Systems: Solar Power
Water	W-4	Require Low-Flow Water Fixtures
Refrigerants	R-5	Reduce Service Leak Emissions
Area Sources	AS-2	Use Low-VOC Paints

* 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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	30.4	30.5	29.8	0.06	1.26	24.0	25.3	1.16	10.6	11.7	6,411

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Mit.	29.7	4.94	29.3	0.06	0.12	6.46	6.57	0.11	2.82	2.93	6,411
% Reduced	2%	84%	2%	—	91%	73%	74%	90%	73%	75%	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	30.4	30.5	29.8	0.06	1.26	24.0	25.3	1.16	10.6	11.7	6,405
Mit.	29.7	4.99	29.3	0.06	0.12	6.46	6.57	0.11	2.82	2.93	6,405
% Reduced	2%	84%	2%	—	91%	73%	74%	90%	73%	75%	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.76	7.24	9.68	0.02	0.26	1.60	1.86	0.24	0.58	0.82	2,155
Mit.	7.30	2.52	10.6	0.02	0.06	0.67	0.73	0.06	0.21	0.27	2,155
% Reduced	6%	65%	-10%	—	76%	58%	61%	75%	63%	67%	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.42	1.32	1.77	< 0.005	0.05	0.29	0.34	0.04	0.11	0.15	357
Mit.	1.33	0.46	1.93	< 0.005	0.01	0.12	0.13	0.01	0.04	0.05	357
% Reduced	6%	65%	-10%	—	76%	58%	61%	75%	63%	67%	—

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	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	30.4	30.5	29.8	0.06	1.26	24.0	25.3	1.16	10.6	11.7	6,411
2027	1.33	7.27	10.5	0.02	0.30	0.14	0.44	0.28	0.04	0.31	1,832
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	30.4	30.5	29.8	0.06	1.26	24.0	25.3	1.16	10.6	11.7	6,405
2027	30.3	11.4	17.0	0.03	0.36	0.70	1.06	0.34	0.17	0.51	3,749
Average Daily	—	—	—	—	—	—	—	—	—	—	—

2026	7.76	7.24	9.68	0.02	0.26	1.60	1.86	0.24	0.58	0.82	2,155
2027	5.38	2.16	3.20	0.01	0.07	0.12	0.19	0.07	0.03	0.10	678
Annual	—	—	—	—	—	—	—	—	—	—	—
2026	1.42	1.32	1.77	< 0.005	0.05	0.29	0.34	0.04	0.11	0.15	357
2027	0.98	0.39	0.58	< 0.005	0.01	0.02	0.03	0.01	0.01	0.02	112

2.3. Construction Emissions by Year, Mitigated

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

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	29.7	4.94	29.3	0.06	0.12	6.46	6.57	0.11	2.82	2.93	6,411
2027	0.75	2.26	11.1	0.02	0.03	0.14	0.17	0.03	0.04	0.07	1,832
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
2026	29.7	4.99	29.3	0.06	0.12	6.46	6.57	0.11	2.82	2.93	6,405
2027	29.6	4.88	18.9	0.03	0.11	0.70	0.81	0.11	0.17	0.28	3,749
Average Daily	—	—	—	—	—	—	—	—	—	—	—
2026	7.30	2.52	10.6	0.02	0.06	0.67	0.73	0.06	0.21	0.27	2,155
2027	5.24	0.88	3.51	0.01	0.02	0.12	0.14	0.02	0.03	0.05	678
Annual	—	—	—	—	—	—	—	—	—	—	—
2026	1.33	0.46	1.93	< 0.005	0.01	0.12	0.13	0.01	0.04	0.05	357
2027	0.96	0.16	0.64	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	112

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.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e

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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	12.2	4.35	31.2	0.05	0.17	3.61	3.78	0.16	0.92	1.08	7,669
Mit.	11.2	4.35	31.2	0.05	0.17	3.61	3.78	0.16	0.92	1.08	7,669
% Reduced	8%	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.7	4.53	24.6	0.05	0.15	3.61	3.76	0.15	0.92	1.07	7,506
Mit.	9.76	4.53	24.6	0.05	0.15	3.61	3.76	0.15	0.92	1.07	7,506
% Reduced	9%	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11.8	4.35	29.8	0.05	0.16	3.23	3.39	0.16	0.82	0.98	7,142
Mit.	10.9	4.35	29.8	0.05	0.16	3.23	3.39	0.16	0.82	0.98	7,142
% Reduced	8%	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.15	0.79	5.45	0.01	0.03	0.59	0.62	0.03	0.15	0.18	1,183
Mit.	1.98	0.79	5.45	0.01	0.03	0.59	0.62	0.03	0.15	0.18	1,183
% Reduced	8%	—	—	—	—	—	—	—	—	—	—

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.56	2.80	21.8	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,355
Area	6.51	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	33.3
Energy	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	2,763
Water	—	—	—	—	—	—	—	—	—	—	96.2

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Waste	—	—	—	—	—	—	—	—	—	—	185
Refrig.	—	—	—	—	—	—	—	—	—	—	236
Total	12.2	4.35	31.2	0.05	0.17	3.61	3.78	0.16	0.92	1.08	7,669
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.44	3.06	23.3	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,226
Area	5.19	—	—	—	—	—	—	—	—	—	—
Energy	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	2,763
Water	—	—	—	—	—	—	—	—	—	—	96.2
Waste	—	—	—	—	—	—	—	—	—	—	185
Refrig.	—	—	—	—	—	—	—	—	—	—	236
Total	10.7	4.53	24.6	0.05	0.15	3.61	3.76	0.15	0.92	1.07	7,506
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.33	2.81	21.3	0.04	0.04	3.23	3.27	0.04	0.82	0.86	3,832
Area	6.38	0.06	7.30	< 0.005	0.01	—	0.01	0.01	—	0.01	30.1
Energy	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	2,763
Water	—	—	—	—	—	—	—	—	—	—	96.2
Waste	—	—	—	—	—	—	—	—	—	—	185
Refrig.	—	—	—	—	—	—	—	—	—	—	236
Total	11.8	4.35	29.8	0.05	0.16	3.23	3.39	0.16	0.82	0.98	7,142
Annual	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.97	0.51	3.89	0.01	0.01	0.59	0.60	0.01	0.15	0.16	634
Area	1.17	0.01	1.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.99
Energy	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	457
Water	—	—	—	—	—	—	—	—	—	—	15.9
Waste	—	—	—	—	—	—	—	—	—	—	30.7
Refrig.	—	—	—	—	—	—	—	—	—	—	39.2
Total	2.15	0.79	5.45	0.01	0.03	0.59	0.62	0.03	0.15	0.18	1,183

Exhibit C

2.6. Operations Emissions by Sector, Mitigated

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

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.56	2.80	21.8	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,355
Area	5.57	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	33.3
Energy	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	2,763
Water	—	—	—	—	—	—	—	—	—	—	96.2
Waste	—	—	—	—	—	—	—	—	—	—	185
Refrig.	—	—	—	—	—	—	—	—	—	—	236
Total	11.2	4.35	31.2	0.05	0.17	3.61	3.78	0.16	0.92	1.08	7,669
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.44	3.06	23.3	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,226
Area	4.24	—	—	—	—	—	—	—	—	—	—
Energy	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	2,763
Water	—	—	—	—	—	—	—	—	—	—	96.2
Waste	—	—	—	—	—	—	—	—	—	—	185
Refrig.	—	—	—	—	—	—	—	—	—	—	236
Total	9.76	4.53	24.6	0.05	0.15	3.61	3.76	0.15	0.92	1.07	7,506
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.33	2.81	21.3	0.04	0.04	3.23	3.27	0.04	0.82	0.86	3,832
Area	5.44	0.06	7.30	< 0.005	0.01	—	0.01	0.01	—	0.01	30.1
Energy	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	2,763
Water	—	—	—	—	—	—	—	—	—	—	96.2
Waste	—	—	—	—	—	—	—	—	—	—	185
Refrig.	—	—	—	—	—	—	—	—	—	—	236

Exhibit C

Total	10.9	4.35	29.8	0.05	0.16	3.23	3.39	0.16	0.82	0.98	7,142
Annual	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.97	0.51	3.89	0.01	0.01	0.59	0.60	0.01	0.15	0.16	634
Area	0.99	0.01	1.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.99
Energy	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	457
Water	—	—	—	—	—	—	—	—	—	—	15.9
Waste	—	—	—	—	—	—	—	—	—	—	30.7
Refrig.	—	—	—	—	—	—	—	—	—	—	39.2
Total	1.98	0.79	5.45	0.01	0.03	0.59	0.62	0.03	0.15	0.18	1,183

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	5,316
Dust From Material Movement	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—
Onsite truck	< 0.005	0.01	< 0.005	< 0.005	< 0.005	4.00	4.00	< 0.005	0.40	0.40	5.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	5,316
Dust From Material Movement	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—

Onsite truck	< 0.005	0.01	0.01	< 0.005	< 0.005	4.00	4.00	< 0.005	0.40	0.40	5.88
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.80	0.79	< 0.005	0.03	—	0.03	0.03	—	0.03	146
Dust From Material Movement	—	—	—	—	—	0.54	0.54	—	0.28	0.28	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.11	0.11	< 0.005	0.01	0.01	0.16
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	24.1
Dust From Material Movement	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	0.03
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.04	0.54	0.00	0.00	0.10	0.10	0.00	0.02	0.02	107
Vendor	0.01	0.31	0.13	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	231
Hauling	0.02	0.97	0.32	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.05	0.52	0.00	0.00	0.10	0.10	0.00	0.02	0.02	102
Vendor	0.01	0.32	0.13	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	230
Hauling	0.01	1.00	0.33	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	750
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.82
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	6.32
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	20.6
Annual	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.47
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.05
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	3.41

3.2. Site Preparation (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	2.59	28.3	0.05	0.10	—	0.10	0.10	—	0.10	5,316
Dust From Material Movement	—	—	—	—	—	5.11	5.11	—	2.63	2.63	—
Onsite truck	< 0.005	0.01	< 0.005	< 0.005	< 0.005	1.01	1.01	< 0.005	0.10	0.10	5.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	2.59	28.3	0.05	0.10	—	0.10	0.10	—	0.10	5,316
Dust From Material Movement	—	—	—	—	—	5.11	5.11	—	2.63	2.63	—
Onsite truck	< 0.005	0.01	0.01	< 0.005	< 0.005	1.01	1.01	< 0.005	0.10	0.10	5.88
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.78	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	146
Dust From Material Movement	—	—	—	—	—	0.14	0.14	—	0.07	0.07	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	< 0.005	0.16
Annual	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	0.01	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	24.1
Dust From Material Movement	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.03
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.04	0.54	0.00	0.00	0.10	0.10	0.00	0.02	0.02	107
Vendor	0.01	0.31	0.13	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	231
Hauling	0.02	0.97	0.32	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.05	0.52	0.00	0.00	0.10	0.10	0.00	0.02	0.02	102
Vendor	0.01	0.32	0.13	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	230
Hauling	0.01	1.00	0.33	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	750
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.82
Vendor	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	6.32
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	20.6
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.47
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	1.05
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	3.41

3.3. Grading (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.65	15.0	17.4	0.03	0.65	—	0.65	0.59	—	0.59	2,970
Dust From Material Movement	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—
Onsite truck	< 0.005	0.01	< 0.005	< 0.005	< 0.005	4.00	4.00	< 0.005	0.40	0.40	5.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.82	0.96	< 0.005	0.04	—	0.04	0.03	—	0.03	163
Dust From Material Movement	—	—	—	—	—	0.39	0.39	—	0.19	0.19	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.22	0.22	< 0.005	0.02	0.02	0.32
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.15	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	26.9
Dust From Material Movement	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	< 0.005	0.05
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.46	0.00	0.00	0.09	0.09	0.00	0.02	0.02	91.4
Vendor	0.01	0.31	0.13	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	231
Hauling	0.02	0.97	0.32	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.83
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	12.6
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	41.1
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.80
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	2.09
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	6.81

3.4. Grading (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.29	2.04	17.8	0.03	0.06	—	0.06	0.06	—	0.06	2,970
Dust From Material Movement	—	—	—	—	—	1.84	1.84	—	0.89	0.89	—
Onsite truck	< 0.005	0.01	< 0.005	< 0.005	< 0.005	1.01	1.01	< 0.005	0.10	0.10	5.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.11	0.97	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	163
Dust From Material Movement	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	0.32
Annual	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Off-Road Equipment	< 0.005	0.02	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	26.9
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.05
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.46	0.00	0.00	0.09	0.09	0.00	0.02	0.02	91.4
Vendor	0.01	0.31	0.13	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	231
Hauling	0.02	0.97	0.32	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.83
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	12.6
Hauling	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	41.1
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.80
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	2.09
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	6.81

3.5. Building Construction (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	2,405

Exhibit C

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.51	4.72	6.22	0.01	0.18	—	0.18	0.17	—	0.17	1,153
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.86	1.13	< 0.005	0.03	—	0.03	0.03	—	0.03	191
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.18	2.33	0.00	0.00	0.44	0.44	0.00	0.10	0.10	464
Vendor	0.02	0.95	0.38	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	702
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.20	2.28	0.00	0.00	0.44	0.44	0.00	0.10	0.10	444
Vendor	0.02	0.98	0.39	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	701
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.10	1.08	0.00	0.00	0.21	0.21	0.00	0.05	0.05	214
Vendor	0.01	0.47	0.18	< 0.005	< 0.005	0.08	0.09	< 0.005	0.02	0.03	336
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.20	0.00	0.00	0.04	0.04	0.00	0.01	0.01	35.5

Exhibit C

Vendor	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	55.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Building Construction (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.47	3.12	15.0	0.02	0.11	—	0.11	0.10	—	0.10	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.47	3.12	15.0	0.02	0.11	—	0.11	0.10	—	0.10	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	1.50	7.18	0.01	0.05	—	0.05	0.05	—	0.05	1,153
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.27	1.31	< 0.005	0.01	—	0.01	0.01	—	0.01	191
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.18	2.33	0.00	0.00	0.44	0.44	0.00	0.10	0.10	464
Vendor	0.02	0.95	0.38	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	702
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Exhibit C

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.20	2.28	0.00	0.00	0.44	0.44	0.00	0.10	0.10	444
Vendor	0.02	0.98	0.39	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	701
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.14	0.10	1.08	0.00	0.00	0.21	0.21	0.00	0.05	0.05	214
Vendor	0.01	0.47	0.18	< 0.005	< 0.005	0.08	0.09	< 0.005	0.02	0.03	336
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.20	0.00	0.00	0.04	0.04	0.00	0.01	0.01	35.5
Vendor	< 0.005	0.09	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	0.01	55.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.43	1.97	< 0.005	0.05	—	0.05	0.05	—	0.05	367
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Off-Road Equipment	0.03	0.26	0.36	< 0.005	0.01	—	0.01	0.01	—	0.01	60.8
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.28	0.18	2.13	0.00	0.00	0.44	0.44	0.00	0.10	0.10	436
Vendor	0.02	0.93	0.37	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	687
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.32	0.00	0.00	0.07	0.07	0.00	0.02	0.02	67.1
Vendor	< 0.005	0.14	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	105
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	11.1
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	17.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2027) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.45	3.08	15.0	0.02	0.10	—	0.10	0.09	—	0.09	2,405

Exhibit C

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.47	2.28	< 0.005	0.02	—	0.02	0.01	—	0.01	367
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.42	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	60.8
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.28	0.18	2.13	0.00	0.00	0.44	0.44	0.00	0.10	0.10	436
Vendor	0.02	0.93	0.37	< 0.005	0.01	0.18	0.19	0.01	0.05	0.06	687
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.32	0.00	0.00	0.07	0.07	0.00	0.02	0.02	67.1
Vendor	< 0.005	0.14	0.06	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	105
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	11.1
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	17.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e

Exhibit C

Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	1,516
Paving	0.52	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	1,516
Paving	0.52	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	83.1
Paving	0.03	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	13.8
Paving	0.01	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.03	0.43	0.00	0.00	0.09	0.09	0.00	0.02	0.02	89.7
Vendor	0.01	0.30	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	226
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Worker	0.06	0.04	0.42	0.00	0.00	0.09	0.09	0.00	0.02	0.02	85.8
Vendor	0.01	0.31	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	226
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.74
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	12.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.78
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	2.05
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Paving (2027) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.93	10.6	0.01	0.03	—	0.03	0.03	—	0.03	1,516
Paving	0.52	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.93	10.6	0.01	0.03	—	0.03	0.03	—	0.03	1,516
Paving	0.52	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Off-Road Equipment	0.01	0.11	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	83.1
Paving	0.03	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	13.8
Paving	0.01	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.03	0.43	0.00	0.00	0.09	0.09	0.00	0.02	0.02	89.7
Vendor	0.01	0.30	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	226
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.42	0.00	0.00	0.09	0.09	0.00	0.02	0.02	85.8
Vendor	0.01	0.31	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	226
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	4.74
Vendor	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	12.4
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.78
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	2.05
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2026) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	134
Architectural Coatings	28.8	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	134
Architectural Coatings	28.8	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.20	0.27	< 0.005	0.01	—	0.01	0.01	—	0.01	32.0
Architectural Coatings	6.87	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.04	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	5.30
Architectural Coatings	1.25	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.47	0.00	0.00	0.09	0.09	0.00	0.02	0.02	92.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.46	0.00	0.00	0.09	0.09	0.00	0.02	0.02	88.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	21.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	3.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Architectural Coating (2026) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	134
Architectural Coatings	28.8	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Exhibit C

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	134
Architectural Coatings	28.8	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.15	0.23	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	32.0
Architectural Coatings	6.87	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	5.30
Architectural Coatings	1.25	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.47	0.00	0.00	0.09	0.09	0.00	0.02	0.02	92.8
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.46	0.00	0.00	0.09	0.09	0.00	0.02	0.02	88.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.11	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	21.4

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	3.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2027) - Unmitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	134
Architectural Coatings	28.8	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.15	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	23.6
Architectural Coatings	5.07	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	3.91
Architectural Coatings	0.93	—	—	—	—	—	—	—	—	—	—

Exhibit C

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.43	0.00	0.00	0.09	0.09	0.00	0.02	0.02	87.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	15.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.56
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2027) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	134
Architectural Coatings	28.8	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.11	0.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	23.6
Architectural Coatings	5.07	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	3.91
Architectural Coatings	0.93	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.04	0.43	0.00	0.00	0.09	0.09	0.00	0.02	0.02	87.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.07	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	15.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	2.56
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Exhibit C

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	2.28	1.15	8.97	0.02	0.02	1.48	1.50	0.02	0.38	0.39	1,788
Quality Restaurant	1.55	0.78	6.07	0.01	0.01	1.00	1.01	0.01	0.25	0.27	1,210
Junior College (2yr)	0.66	0.33	2.61	< 0.005	0.01	0.43	0.44	< 0.005	0.11	0.11	520
General Office Building	1.07	0.54	4.20	0.01	0.01	0.69	0.70	0.01	0.18	0.18	836
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.56	2.80	21.8	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,355
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	2.23	1.25	9.58	0.02	0.02	1.48	1.50	0.02	0.38	0.39	1,735
Quality Restaurant	1.51	0.85	6.49	0.01	0.01	1.00	1.02	0.01	0.25	0.27	1,174
Junior College (2yr)	0.65	0.36	2.79	< 0.005	0.01	0.43	0.44	< 0.005	0.11	0.11	505
General Office Building	1.04	0.59	4.48	0.01	0.01	0.69	0.70	0.01	0.18	0.18	812
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.44	3.06	23.3	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,226
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.40	0.23	1.69	< 0.005	< 0.005	0.27	0.27	< 0.005	0.07	0.07	289

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Quality Restaurant	0.26	0.12	0.91	< 0.005	< 0.005	0.11	0.12	< 0.005	0.03	0.03	126
Junior College (2yr)	0.12	0.07	0.49	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	84.0
General Office Building	0.19	0.11	0.79	< 0.005	< 0.005	0.13	0.13	< 0.005	0.03	0.03	135
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.97	0.51	3.89	0.01	0.01	0.59	0.60	0.01	0.15	0.16	634

4.1.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	2.28	1.15	8.97	0.02	0.02	1.48	1.50	0.02	0.38	0.39	1,788
Quality Restaurant	1.55	0.78	6.07	0.01	0.01	1.00	1.01	0.01	0.25	0.27	1,210
Junior College (2yr)	0.66	0.33	2.61	< 0.005	0.01	0.43	0.44	< 0.005	0.11	0.11	520
General Office Building	1.07	0.54	4.20	0.01	0.01	0.69	0.70	0.01	0.18	0.18	836
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.56	2.80	21.8	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,355
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	2.23	1.25	9.58	0.02	0.02	1.48	1.50	0.02	0.38	0.39	1,735
Quality Restaurant	1.51	0.85	6.49	0.01	0.01	1.00	1.02	0.01	0.25	0.27	1,174
Junior College (2yr)	0.65	0.36	2.79	< 0.005	0.01	0.43	0.44	< 0.005	0.11	0.11	505
General Office Building	1.04	0.59	4.48	0.01	0.01	0.69	0.70	0.01	0.18	0.18	812

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.44	3.06	23.3	0.04	0.04	3.61	3.65	0.04	0.92	0.96	4,226
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.40	0.23	1.69	< 0.005	< 0.005	0.27	0.27	< 0.005	0.07	0.07	289
Quality Restaurant	0.26	0.12	0.91	< 0.005	< 0.005	0.11	0.12	< 0.005	0.03	0.03	126
Junior College (2yr)	0.12	0.07	0.49	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	84.0
General Office Building	0.19	0.11	0.79	< 0.005	< 0.005	0.13	0.13	< 0.005	0.03	0.03	135
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.97	0.51	3.89	0.01	0.01	0.59	0.60	0.01	0.15	0.16	634

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	506
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	144
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	51.5
General Office Building	—	—	—	—	—	—	—	—	—	—	211
Parking Lot	—	—	—	—	—	—	—	—	—	—	86.1
Total	—	—	—	—	—	—	—	—	—	—	999
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—

Hotel	—	—	—	—	—	—	—	—	—	—	506
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	144
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	51.5
General Office Building	—	—	—	—	—	—	—	—	—	—	211
Parking Lot	—	—	—	—	—	—	—	—	—	—	86.1
Total	—	—	—	—	—	—	—	—	—	—	999
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	83.8
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	23.8
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	8.52
General Office Building	—	—	—	—	—	—	—	—	—	—	35.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	14.3
Total	—	—	—	—	—	—	—	—	—	—	165

4.2.2. Electricity Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	506
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	144
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	51.5
General Office Building	—	—	—	—	—	—	—	—	—	—	211

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Parking Lot	—	—	—	—	—	—	—	—	—	—	86.1
Total	—	—	—	—	—	—	—	—	—	—	999
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	506
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	144
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	51.5
General Office Building	—	—	—	—	—	—	—	—	—	—	211
Parking Lot	—	—	—	—	—	—	—	—	—	—	86.1
Total	—	—	—	—	—	—	—	—	—	—	999
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	83.8
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	23.8
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	8.52
General Office Building	—	—	—	—	—	—	—	—	—	—	35.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	14.3
Total	—	—	—	—	—	—	—	—	—	—	165

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.06	1.01	0.85	0.01	0.08	—	0.08	0.08	—	0.08	1,205

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Quality Restaurant	0.01	0.20	0.17	< 0.005	0.02	—	0.02	0.02	—	0.02	239
Junior College (2yr)	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	189
General Office Building	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	130
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	1,764
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.06	1.01	0.85	0.01	0.08	—	0.08	0.08	—	0.08	1,205
Quality Restaurant	0.01	0.20	0.17	< 0.005	0.02	—	0.02	0.02	—	0.02	239
Junior College (2yr)	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	189
General Office Building	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	130
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	1,764
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.01	0.18	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	200
Quality Restaurant	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	39.5
Junior College (2yr)	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	31.3
General Office Building	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	21.6
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	292

4.2.4. Natural Gas Emissions By Land Use - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.06	1.01	0.85	0.01	0.08	—	0.08	0.08	—	0.08	1,205
Quality Restaurant	0.01	0.20	0.17	< 0.005	0.02	—	0.02	0.02	—	0.02	239
Junior College (2yr)	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	189
General Office Building	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	130
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	1,764
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.06	1.01	0.85	0.01	0.08	—	0.08	0.08	—	0.08	1,205
Quality Restaurant	0.01	0.20	0.17	< 0.005	0.02	—	0.02	0.02	—	0.02	239
Junior College (2yr)	0.01	0.16	0.13	< 0.005	0.01	—	0.01	0.01	—	0.01	189
General Office Building	0.01	0.11	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	130
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00
Total	0.08	1.47	1.24	0.01	0.11	—	0.11	0.11	—	0.11	1,764
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.01	0.18	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	200
Quality Restaurant	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	39.5
Junior College (2yr)	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	31.3
General Office Building	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	21.6
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00

Exhibit C

Total	0.01	0.27	0.23	< 0.005	0.02	—	0.02	0.02	—	0.02	292

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.99	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	1.20	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.33	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	33.3
Total	6.51	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	33.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.99	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	1.20	—	—	—	—	—	—	—	—	—	—
Total	5.19	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.73	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.22	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.22	0.01	1.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.99
Total	1.17	0.01	1.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.99

Exhibit C

4.3.2. Mitigated

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

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.99	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.26	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.33	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	33.3
Total	5.57	0.07	8.07	< 0.005	0.01	—	0.01	0.01	—	0.01	33.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	3.99	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.26	—	—	—	—	—	—	—	—	—	—
Total	4.24	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.73	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.05	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.22	0.01	1.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.99
Total	0.99	0.01	1.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	4.99

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Exhibit C

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	29.0
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	20.9
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	9.51
General Office Building	—	—	—	—	—	—	—	—	—	—	36.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.39
Total	—	—	—	—	—	—	—	—	—	—	96.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	29.0
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	20.9
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	9.51
General Office Building	—	—	—	—	—	—	—	—	—	—	36.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.39
Total	—	—	—	—	—	—	—	—	—	—	96.2
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	4.80
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	3.46
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	1.57
General Office Building	—	—	—	—	—	—	—	—	—	—	6.02
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.06

Exhibit C

Total	—	—	—	—	—	—	—	—	—	—	15.9

4.4.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	29.0
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	20.9
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	9.51
General Office Building	—	—	—	—	—	—	—	—	—	—	36.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.39
Total	—	—	—	—	—	—	—	—	—	—	96.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	29.0
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	20.9
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	9.51
General Office Building	—	—	—	—	—	—	—	—	—	—	36.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.39
Total	—	—	—	—	—	—	—	—	—	—	96.2
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	4.80
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	3.46

Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	1.57
General Office Building	—	—	—	—	—	—	—	—	—	—	6.02
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.06
Total	—	—	—	—	—	—	—	—	—	—	15.9

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	103
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	10.3
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	40.4
General Office Building	—	—	—	—	—	—	—	—	—	—	31.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	185
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	103
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	10.3
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	40.4
General Office Building	—	—	—	—	—	—	—	—	—	—	31.5

Exhibit C

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	185
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	17.1
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	1.71
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	6.70
General Office Building	—	—	—	—	—	—	—	—	—	—	5.21
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	30.7

4.5.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	103
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	10.3
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	40.4
General Office Building	—	—	—	—	—	—	—	—	—	—	31.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	185
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	103

Exhibit C

Quality Restaurant	—	—	—	—	—	—	—	—	—	—	10.3
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	40.4
General Office Building	—	—	—	—	—	—	—	—	—	—	31.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	185
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	17.1
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	1.71
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	6.70
General Office Building	—	—	—	—	—	—	—	—	—	—	5.21
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	30.7

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	227
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	9.38
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	0.06

Exhibit C

General Office Building	—	—	—	—	—	—	—	—	—	—	0.04
Total	—	—	—	—	—	—	—	—	—	—	236
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	227
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	9.38
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	0.06
General Office Building	—	—	—	—	—	—	—	—	—	—	0.04
Total	—	—	—	—	—	—	—	—	—	—	236
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	37.6
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	1.55
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	0.01
General Office Building	—	—	—	—	—	—	—	—	—	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	39.2

4.6.2. Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	227
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	9.38

Exhibit C

Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	0.06
General Office Building	—	—	—	—	—	—	—	—	—	—	0.04
Total	—	—	—	—	—	—	—	—	—	—	236
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	227
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	9.38
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	0.06
General Office Building	—	—	—	—	—	—	—	—	—	—	0.04
Total	—	—	—	—	—	—	—	—	—	—	236
Annual	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	37.6
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	1.55
Junior College (2yr)	—	—	—	—	—	—	—	—	—	—	0.01
General Office Building	—	—	—	—	—	—	—	—	—	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	39.2

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e

Exhibit C

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

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

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

Exhibit C

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—

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Subtotal	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

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

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

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

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

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

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	3/18/2026	4/1/2026	5.00	10.0	—
Grading	Grading	4/2/2026	4/30/2026	5.00	20.0	—
Building Construction	Building Construction	5/1/2026	3/19/2027	5.00	230	—
Paving	Paving	3/20/2027	4/17/2027	5.00	20.0	—
Architectural Coating	Architectural Coating	9/1/2026	3/31/2027	5.00	152	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41

Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Tier 4 Final	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 4 Final	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45

Exhibit C

Paving	Pavers	Diesel	Tier 4 Final	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 4 Final	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 4 Final	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	8.10	LDA,LDT1,LDT2
Site Preparation	Vendor	10.0	6.90	HHDT,MHDT
Site Preparation	Hauling	10.0	20.0	HHDT
Site Preparation	Onsite truck	1.00	2.00	MHDT
Grading	—	—	—	—
Grading	Worker	15.0	8.10	LDA,LDT1,LDT2
Grading	Vendor	10.0	6.90	HHDT,MHDT
Grading	Hauling	10.0	20.0	HHDT
Grading	Onsite truck	1.00	2.00	MHDT
Building Construction	—	—	—	—
Building Construction	Worker	76.2	8.10	LDA,LDT1,LDT2
Building Construction	Vendor	30.4	6.90	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	8.10	LDA,LDT1,LDT2
Paving	Vendor	10.0	6.90	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT

Exhibit C

Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	15.2	8.10	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.90	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	8.10	LDA,LDT1,LDT2
Site Preparation	Vendor	10.0	6.90	HHDT,MHDT
Site Preparation	Hauling	10.0	20.0	HHDT
Site Preparation	Onsite truck	1.00	2.00	MHDT
Grading	—	—	—	—
Grading	Worker	15.0	8.10	LDA,LDT1,LDT2
Grading	Vendor	10.0	6.90	HHDT,MHDT
Grading	Hauling	10.0	20.0	HHDT
Grading	Onsite truck	1.00	2.00	MHDT
Building Construction	—	—	—	—
Building Construction	Worker	76.2	8.10	LDA,LDT1,LDT2
Building Construction	Vendor	30.4	6.90	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	8.10	LDA,LDT1,LDT2
Paving	Vendor	10.0	6.90	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT

Exhibit C

Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	15.2	8.10	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.90	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	278,475	92,825	10,454

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	15.0	0.00	—
Grading	—	—	20.0	0.00	—
Paving	0.00	0.00	0.00	0.00	4.00

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Exhibit C

Land Use	Area Paved (acres)	% Asphalt
Hotel	0.00	0%
Quality Restaurant	0.00	0%
Junior College (2yr)	0.00	0%
General Office Building	0.00	0%
Parking Lot	4.00	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Hotel	588	588	588	214,620	2,095	2,095	2,095	764,500
Quality Restaurant	398	398	398	145,270	667	1,418	1,418	321,698
Junior College (2yr)	171	171	171	62,415	609	609	609	222,329
General Office Building	275	275	275	100,375	980	980	980	357,547
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Hotel	588	588	588	214,620	2,095	2,095	2,095	764,500
Quality Restaurant	398	398	398	145,270	667	1,418	1,418	321,698

Junior College (2yr)	171	171	171	62,415	609	609	609	222,329
General Office Building	275	275	275	100,375	980	980	980	357,547
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	278,475	92,825	10,454

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	330

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	330

5.11. Operational Energy Consumption

Exhibit C

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Hotel	896,676	204	0.0330	0.0040	3,750,043
Quality Restaurant	254,716	204	0.0330	0.0040	743,210
Junior College (2yr)	91,173	204	0.0330	0.0040	589,199
General Office Building	374,641	204	0.0330	0.0040	405,454
Parking Lot	152,634	204	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Hotel	896,676	204	0.0330	0.0040	3,750,043
Quality Restaurant	254,716	204	0.0330	0.0040	743,210
Junior College (2yr)	91,173	204	0.0330	0.0040	589,199
General Office Building	374,641	204	0.0330	0.0040	405,454
Parking Lot	152,634	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Hotel	2,536,677	177,839
Quality Restaurant	1,821,202	177,839
Junior College (2yr)	809,309	177,839
General Office Building	3,190,321	177,839
Parking Lot	0.00	177,839

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Hotel	2,536,677	177,839
Quality Restaurant	1,821,202	177,839
Junior College (2yr)	809,309	177,839
General Office Building	3,190,321	177,839
Parking Lot	0.00	177,839

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Hotel	54.8	—
Quality Restaurant	5.47	—
Junior College (2yr)	21.4	—
General Office Building	16.7	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Hotel	54.8	—
Quality Restaurant	5.47	—
Junior College (2yr)	21.4	—
General Office Building	16.7	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Hotel	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Hotel	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Hotel	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Quality Restaurant	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Quality Restaurant	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Quality Restaurant	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Junior College (2yr)	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Junior College (2yr)	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Junior College (2yr)	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Junior College (2yr)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

Hotel	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Hotel	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Hotel	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Quality Restaurant	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Quality Restaurant	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Quality Restaurant	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Junior College (2yr)	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Junior College (2yr)	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Junior College (2yr)	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Junior College (2yr)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

Exhibit C

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	21.8	annual days of extreme heat
Extreme Precipitation	3.80	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	21.9	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

6.3. Adjusted Climate Risk Scores

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

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Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

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

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	42.8
AQ-PM	6.43
AQ-DPM	11.4
Drinking Water	63.5
Lead Risk Housing	6.78
Pesticides	70.3
Toxic Releases	11.7
Traffic	15.7
Effect Indicators	—
CleanUp Sites	79.8
Groundwater	22.1
Haz Waste Facilities/Generators	96.0
Impaired Water Bodies	33.2
Solid Waste	0.00

Sensitive Population	—
Asthma	50.5
Cardio-vascular	23.5
Low Birth Weights	41.9
Socioeconomic Factor Indicators	—
Education	29.3
Housing	48.5
Linguistic	0.00
Poverty	31.3
Unemployment	57.2

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	71.0252791
Employed	91.65918132
Median HI	67.58629539
Education	—
Bachelor's or higher	51.50776338
High school enrollment	100
Preschool enrollment	48.90286154
Transportation	—
Auto Access	68.11240857
Active commuting	3.644296163
Social	—
2-parent households	87.79674066
Voting	92.57025536

Neighborhood	—
Alcohol availability	54.70293853
Park access	8.084178109
Retail density	13.90991916
Supermarket access	33.38893879
Tree canopy	42.24303862
Housing	—
Homeownership	83.48517901
Housing habitability	88.47683819
Low-inc homeowner severe housing cost burden	31.90042346
Low-inc renter severe housing cost burden	92.57025536
Uncrowded housing	64.30129603
Health Outcomes	—
Insured adults	91.7875016
Arthritis	0.0
Asthma ER Admissions	45.7
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	59.3
Cognitively Disabled	93.6
Physically Disabled	83.0
Heart Attack ER Admissions	67.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0

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Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	50.1
Elderly	23.5
English Speaking	92.9
Foreign-born	8.5
Outdoor Workers	8.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	86.1
Traffic Density	17.1
Traffic Access	0.0
Other Indices	—
Hardship	25.3
Other Decision Support	—
2016 Voting	89.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	27.0

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Healthy Places Index Score for Project Location (b)	76.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Based on model defaults. Arch coating estimated to begin four months after start of construction.
Operations: Vehicle Data	Based on traffic analysis trip gen rates
Operations: Water and Waste Water	Based on project ETAF dispersed equally
Construction: Trips and VMT	Includes 2 miles of travel daily for onsite water truck travel. Includes 10 MHD/HHDT vendor trips/day and 10 HHDT trips/day during site preparation and grading. All other based on model defaults.

Exhibit C

Ayres Resort Expansion Quarterly Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Ayres Resort Expansion
Construction Start Date	2/17/2026
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.00
Precipitation (days)	0.20
Location	35.64841193637051, -120.67048201594922
County	San Luis Obispo
City	Paso Robles
Air District	San Luis Obispo County APCD
Air Basin	South Central Coast
TAZ	3307
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Hotel	100	Room	3.33	145,200	23,661	—	—	—

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Quality Restaurant	6.00	1000sqft	0.14	6,000	23,661	—	—	—
Junior College (2yr)	16.5	1000sqft	0.38	16,500	23,661	23,661	—	—
General Office Building	17.9	1000sqft	0.41	17,950	23,661	—	—	—
Parking Lot	4.00	Acre	4.00	0.00	23,661	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-5	Use Advanced Engine Tiers
Construction	C-10-A	Water Exposed Surfaces
Construction	C-10-C	Water Unpaved Construction Roads
Construction	C-11	Limit Vehicle Speeds on Unpaved Roads
Construction	C-12	Sweep Paved Roads
Energy	E-2	Require Energy Efficient Appliances
Energy	E-10-B	Establish Onsite Renewable Energy Systems: Solar Power
Water	W-4	Require Low-Flow Water Fixtures
Refrigerants	R-5	Reduce Service Leak Emissions
Area Sources	AS-2	Use Low-VOC Paints

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

2. Emissions Summary

2.1. Construction Emissions

2.1.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (ton/quarter) and GHGs (MT/quarter)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Q1	—	—	—	—	—	—	—	—	—	—	—

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Unmit.	0.06	0.51	0.61	< 0.005	0.02	0.25	0.27	0.02	0.10	0.12	122
Mit.	0.02	0.13	0.64	< 0.005	< 0.005	0.08	0.08	< 0.005	0.03	0.03	122
% Reduced	65%	75%	-6%	—	84%	70%	71%	83%	71%	73%	—
Q2	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.20	0.36	0.52	< 0.005	0.01	0.02	0.03	0.01	0.01	0.02	106
Mit.	0.18	0.14	0.58	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	106
% Reduced	10%	61%	-12%	—	70%	—	27%	69%	—	49%	—
Q3	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.81	0.70	1.02	< 0.005	0.02	0.04	0.06	0.02	0.01	0.03	204
Mit.	1.77	0.29	1.13	< 0.005	0.01	0.04	0.05	0.01	0.01	0.02	204
% Reduced	2%	58%	-11%	—	71%	—	25%	69%	—	47%	—
Q4	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.97	0.76	1.11	< 0.005	0.03	0.05	0.07	0.02	0.01	0.03	222
Mit.	1.93	0.32	1.23	< 0.005	0.01	0.05	0.05	0.01	0.01	0.02	222
% Reduced	2%	58%	-11%	—	70%	—	25%	69%	—	47%	—
Q5	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.33	0.11	0.16	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	26.2
Mit.	0.32	0.04	0.17	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	26.2
% Reduced	3%	63%	-6%	—	86%	—	45%	85%	—	68%	—
Quarterly (Max)	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.87	0.63	0.84	< 0.005	0.02	0.10	0.10	0.02	0.05	0.05	142
Mit.	1.87	0.20	0.97	< 0.005	0.01	0.04	0.04	0.01	0.01	0.01	142
% Reduced	—	68%	-16%	—	71%	63%	63%	70%	74%	74%	—

2.1.2. Construction Quarters

Quarter	Start Date	End Date	Length (days)
Q1	3/18/2026	6/16/2026	91

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Q2	6/17/2026	9/15/2026	91
Q3	9/16/2026	12/15/2026	91
Q4	12/16/2026	3/16/2027	91
Q5	3/17/2027	4/17/2027	32

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (ton/quarter) and GHGs (MT/quarter)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	CO2e
Quarterly	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.54	0.20	1.36	< 0.005	0.01	0.15	0.15	0.01	0.04	0.04	296
Mit.	0.50	0.20	1.36	< 0.005	0.01	0.15	0.15	0.01	0.04	0.04	296
% Reduced	8%	—	—	—	—	—	—	—	—	—	—