

**FINAL GENERAL CONFORMITY DETERMINATION
FOR THE BARSTOW CASINO-HOTEL COMPLEX PROJECT**

APRIL 2016

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1.0 INTRODUCTION

This Final General Conformity Determination has been prepared for Alternatives A and B analyzed within the Environmental Impact Statement (EIS) prepared by the Bureau of Indian Affairs for the Los Coyotes Band of Cahuilla and Cupeño Indians (Tribe) 23.1-acre Fee-to-Trust and Casino Hotel Project in the City Barstow, California.

Alternatives A and Alternative B are planned for Barstow site, located near State Route 15 approximately 130 miles east of Bakersfield, California and 115 miles north of Los Angeles, California. Alternatives A and B each consist of the development of a casino-hotel resort within the project site, which would total approximately 377,280 or 261,400 square feet in area, respectively. The casino-hotel resort developed under either alternative would include restaurants, hotel rooms, entertainment venues, banquet/meeting space, as well as a pool and spa.

General conformity thresholds would apply to Alternatives A and B because they are located in the Mohave Desert Air Basin (MDAB), which has been designated by the EPA as nonattainment for ozone and particulate matter 10 microns in size (PM₁₀). The MDAB is within the jurisdictional boundaries of the Mojave Desert Air Quality Management District (MDAQMD).

A draft conformity determination was prepared for Alternatives A and B and circulated for public review and comment in accordance with 40 CFR Part 51. The 30-day public comment period began on February 19, 2016 and ended March 21, 2016. During the comment period, the BIA received one written comment letter from the Mojave Desert Air Quality Management District concurring with the conformity applicability and project emissions analyses (**Attachment 2**).

2.0 GENERAL CONFORMITY – REGULATORY BACKGROUND

The United States Environmental Protection Agency (USEPA) promulgated the General Conformity Rule on November 30, 1993 to implement the conformity provision of Title I, Section 176 (c)(1) of the Federal Clean Air Act (CAA), which requires that the Federal government not engage, support, or provide financial assistance for licensing or permitting, or approving any activity not conforming to an approved CAA implementation plan. The USEPA issued a final revised General Conformity Rule on April 5, 2010. Changes to the General Conformity Rule that may be applicable to the Proposed Project are as follows:

- Allow states and tribes to develop their own “presumed to conform” list for actions covered by the state’s SIP (40 CFR 51.851).
- Provides for the use of early emissions reduction credits (40 CFR 93.165).
- With certain limits, allows emissions from one precursor of a criteria pollutant to be offset by the reduction in the emissions or another precursor of that pollutant (40 CFR 93.164).

- Eliminates the requirement that a federal agency submit a conformity determination for regionally significant actions where the direct and indirect emission of any pollutant represents ten percent or more of the area's emissions inventory for that pollutant (40 CFR 93.153).
- Provides alternative methods to demonstrate conformity for time periods beyond those covered by the State Implementation Plan (SIP) (40 CFR 93.162).
- Allows federal agencies to obtain emissions offsets for General Conformity requirements from a nearby nonattainment or maintenance area of equal or higher classification, provided that the emissions from the nearby area contribute to the violations of the National Ambient Air Quality Standards (NAAQS) in the area where the federal action is located (40 CFR 93.158 (a)(2) and (a)(5)(iii)).

CAA conformity is an issue that may be addressed prior, during, or after the National Environmental Policy Act (NEPA) process.

General Conformity Process

The conformity process involves two phases. The first phase is the conformity review process, which evaluates whether the conformity regulations would apply to the federal action (i.e. whether a determination is warranted). The second phase is the conformity determination process, which demonstrates how a federal action conforms to the applicable SIP.

Conformity Review

The purpose of a conformity review is to evaluate whether the conformity determination requirements would apply to a federal action under 40 CFR 93.153. There are four steps in the review process, of which the first three can be performed in any order. The four steps are identified below:

- Determine whether the proposed action causes emissions of criteria air pollutants (CAPs).
- Determine whether the emissions of a criteria pollutant or its precursor (i.e. nitrogen oxides [NOx] and reactive organic gases [ROG] for ozone [O₃]) would occur in a non-attainment or maintenance area for that CAP.
- Determine whether the federal action is exempt from the conformity requirement as per 40 CFR 93.153 (c)(2)-(e).
- Estimate the total emissions of the pollutants of concern from the proposed action and compare the estimates to the *de minimus* level of 40 CFR 93.153 (b)(1) and (2) and to the non-attainment or maintenance area's emissions inventory for each CAP.

If the proposed project and/or alternatives do not emit pollutants or are exempt under 40 CFR 93.153 (c)(2)-(e), or if the affected air basin is in attainment for all criteria pollutants, no further action is necessary. Otherwise, the proposed project's estimated emissions must be compared to the *de minimus*

levels set forth in 40 CFR 93.153 (b)(1) and (2). If the emissions are greater than or equal to the *de minimus* level, a conformity determination must be performed.

Conformity Determination

The purpose of the conformity determination, if needed, is to show if the Proposed Project conforms to the SIP. Conformity can be shown for ozone precursors, NO_x and ROG, and PM₁₀ by one of following four options:

- The applicable SIP specifically includes an allowance for emissions of the Proposed Project, 40 CFR 93.158 (a)(1);
- Offset emission credits are purchased for the total direct and indirect emissions, which fully offsets emissions within the same non-attainment or maintenance area so that there is no net increase in emissions, 40 CFR 93.158 (a)(2).
- Emissions from the Proposed Project coupled with the current emissions in the non-attainment area would not exceed the emissions budget in the SIP, 40 CFR 93.158 (a)(5)(i)(A).
- The Proposed Project can request that the SIP be changed by the State Governor or the State Governor's designee to include the emissions budget of the Federal action 40 CFR 93.158 (a)(5)(i)(B).

Even if a project is shown to conform to the SIP by the above method, the project may not be determined to conform to the applicable SIP unless the total direct and indirect emissions for the action are in compliance or consistent with all relevant requirements and milestones contained in the applicable SIP (40 CFR 93.158 (c)). Compliance may include but is not limited to:

- The use of baseline emissions that reflect the historical activity levels that occurred in the geographic area;
- Reasonable further progress schedules;
- Assumptions specified in the attainment or maintenance demonstration, prohibitions, numerical emission limits, and
- Work practice requirements.

3.0 CONFORMITY REVIEW/APPLICABILITY OF PROPOSED PROJECT

Emissions

Emissions resulting from the alternatives are analyzed in two distinct phases, construction and operational. Construction emissions are intermittent and temporary in nature and do not overlap with the operational phase. Criteria pollutants will be produced during both phases. Pollutants of concern during construction are ozone (the largest sources of which are NO_x and ROG emissions), and PM₁₀. NO_x and ROG are produced during combustion of diesel and gasoline fuels in heavy equipment and emitted by employee vehicles. The bulk of PM₁₀ emissions are from fugitive dust, which is produced during grading

activities. Operational emissions consist of area and vehicle emissions. Pollutants of concern from vehicle emissions are NOx and ROG. The EIS gives a detailed account of emissions from both construction and operations.

Attainment/Non-Attainment Area

The Proposed Project would be constructed and operated within the boundaries of the MDAB. The MDAB is currently designated severe-17 non-attainment for 8-hour ozone and moderate for PM₁₀ under the NAAQS.

Exemption

The Federal action that is described in **Section 1.0** would result in ozone precursor (NOx and ROG) emissions greater than de minimus levels, does not have emissions that are associated with a conforming program, cannot be analyzed under certain other environmental regulation, and is not in response to an emergency or natural disaster. The Proposed Project, therefore, is not exempt from a conformity determination under 40 CFR 93.153 (c)(2)-(e).

De minimus Levels

Construction-related emissions from Alternatives A and B do not exceed the de minimus levels of 25 tons per year (tpy) of ROG or NOx (refer to **Attachment 1**) or 100 tpy for PM₁₀. Operational emissions were estimated using the California Air Resource Board (CARB) and MDAQMD approved land use based California Emissions Estimator Model (CalEEMod) air model. As shown in **Tables 1** and **2**, Alternative A and B operational emissions for ROG and NOx exceeded the 25 tpy level established under 40 CFR 93.153 (b)(1); therefore, a conformity determination is required for ROG and NOx. Operational emissions of PM₁₀ do not exceed the *de minimus* level; therefore, a conformity determination is not warranted for this criteria pollutant. The CalEEMod output files are provided in **Attachment 1**.

Table 1

Alternative A – Pollutants of Special Concern Unmitigated Operational Emissions

Source	ROG	NOx	PM ₁₀
	tons per year (tpy)		
Area	2.04	0.00	0.00
Energy	0.14	1.31	0.10
Mobile	42.34	50.54	29.03
Total	44.52	51.86	29.13
<i>Applicable Conformity Levels</i>	25	25	100
Exceedance of Levels	Yes	Yes	No

Source: CalEEMod2013.2.2, 2014; AES, 2016.

Table 2

Alternative B – Pollutants of Special Concern Unmitigated Operational Emissions

Source	ROG	NOx	PM₁₀
	tons per year (tpy)		
Area	1.64	0.00	0.00
Energy	0.11	1.01	0.08
Mobile	31.27	37.34	21.46
Total	33.03	38.35	21.53
<i>Applicable Conformity Levels</i>	25	25	100
Exceedance of Level	Yes	Yes	No

Source: AES, 2010.

4.0 GENERAL CONFORMITY DETERMINATION

Ozone Determination

Ozone is not emitted directly into the air, but is formed by a photochemical reaction in the atmosphere. Ozone is the product of a series of chemical reactions involving sunlight, ROG and NO_x. In accordance with 40 CFR 51.852 ROG and NO_x are defined as ozone precursors and therefore, are the pollutants which are analyzed below.

Analysis

As discussed above, a general conformity determination is required for NOx and ROG emissions resulting from Alternative A and Alternative B. The conformity determination process is described in **Section 2.0** of this report.

In 2004, the USEPA designated the MDAB as moderate nonattainment for the federal 8-hour ozone standard, and in June, 2008 the MDAB was redesignated severe-17 nonattainment. USEPA has allowed MDAQMD until 2021 to achieve a designation and classification of transitional attainment for the 8-hour ozone standard.

The 2004 8-hour ozone plan would not enable MDAB to achieve attainment by June 2010; therefore, in June, 2008 the MDAQMD board approved an amendment to the plan extending the attainment date from June 2010 to June 2021. Due to the reclassification of the MDAB to severe-17 nonattainment, the applicable conformity levels for NOx and ROG were lowered from 100 tons per year of ozone precursors (NOx and ROG) to 25 tons per year. Therefore, a conformity determination is required for Alternatives A and B because estimated emissions would exceed the current conformity levels of 25 tpy of ROG and NOx.

Offsets

Conformity can be achieved by fully offsetting ROG and NOx operational emissions from Alternatives A and B through the acquisition of emission credits, which must be real, surplus, permanent, quantifiable, enforceable, and obtained and used in accordance with the federally approved SIP, or an equally enforceable measure.

Emission Budget

The Proposed Project coupled with the most recent MDAB emissions inventory exceeds the applicable ozone SIPs emission budget.

Addendum to SIP

The Proposed Project does not anticipate that the Governor of California or State Governor's designee would approve an addendum to the present applicable SIP, which would include the Proposed Project's estimated emissions.

Conformity will be achieved through the purchase of offset credits as follows:

- The Tribe shall agree to purchase ERCs in the amount of 52 tons of NOx and 45 tons of ROG if Alternative A is determined to be the Preferred Project.
- The Tribe shall agree to purchase ERCs in the amount of 38 tons of NOx and 33 tons of ROG if Alternative B is determined to be the Preferred Project.
- ERCs will be purchased under the rules of MDAQMD in accordance with 40 CFR 93.158 (a)(2) prior to operation of the project and may be from an adjacent air district so long as the credits conform with Section 40709.6 of the Health and Safety Code.

It should be noted that the ERCs must be real, surplus, permanent, quantifiable, enforceable, and obtained and used in accordance with the federally approved SIP for the MDAB. The Tribe will provide the USEPA and other agencies with documentation necessary to support the emissions reductions through offset purchase, such as certification of ERC purchase or a binding agreement requiring ERC purchase prior to operation.

Additionally, the following best management practices will be implemented to reduce the operational emissions of Alternatives A and B:

- The Tribe shall provide on-site pedestrian facility enhancements such as walkways, benches, proper lighting, and building access, which are physically separated from parking lot traffic.
- The Tribe shall provide adequate ingress and egress at entrances to the facilities to minimize vehicle idling and traffic congestion.

- Design the project site to maximize bicycle access and provide secure bicycle parking/lockers in public parking facilities. Provide locker room/showers to employees who bicycle.
- Use bicycles and/or low-emission vehicles for security patrols and other facility vehicle needs.
- Buses shall comply with the California Air Resource Board's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (California Code of Regulations, Title 13, Division 3, Article 1, Chapter 10, Section 2485) which requires that the driver of any diesel bus shall not idle for more than 5 minutes at any location, except in the case of passenger boarding where a ten minute limit is imposed, or when passengers are onboard. Furthermore the Tribe shall provide a “Drivers Lounge” for bus and truck drivers to discourage idling.
- Implement a carpool/vanpool program e.g., carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.
- Electric landscaping equipment shall be used for commercial and educational facilities.
- Electric vehicle charging stations will be provided within the on-site parking areas for casino employees and patrons.

5.0 CONCLUSION

This Draft Conformity Determination will be submitted to the USEPA, CARB, and MDAQMD per 40 CFR 93.155 (a). After the 30-day comment period for this Draft Conformity Determination, the BIA will make a Final Conformity Determination per 40 CFR 93.150 (b), prior to the federal action being taken.

In compliance with the mitigation measures detailed in the EIS and future ROD, the Tribe commits to implementing best management practices to minimize emissions and purchase ERCs sufficient to offset the operational effects of the proposed project in accordance with the federally approved SIP for the MDAQMD. Because the anticipated air quality effects are associated with operation of the casino-hotel complex and not with construction of the facility, real, surplus, permanent, quantifiable, and enforceable ERCs will be purchased prior to the opening day of the casino-hotel complex.

Operation of Alternative A would generate an estimated 52 tpy of NOx and 45 tpy of ROG. Operation of Alternative B would generate an estimated 38 tpy of NOx and 33 tpy of ROG. To mitigate these effects, the Tribe will purchase ERCs within the MDAQMD in the above amount for the alternative chosen as the preferred alternative. Therefore, with mitigation the Proposed Project would conform to the applicable SIP and meet general conformity requirements.

ATTACHMENT 1

MODEL OUTPUT FILES

ALTERNATIVE A

Barstow Alt. A
San Bernardino-Mojave Desert County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	229.02	User Defined Unit	4.00	174,240.00	5418
High Turnover (Sit Down Restaurant)	5.86	1000sqft	0.13	5,860.00	596
Hotel	160.00	Room	2.00	232,320.00	330

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	32
Climate Zone	10			Operational Year	2019
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - based on project description and 1.6 persons per trip.

Construction Phase - Estimated construction phases.

Off-road Equipment - Estimated equipment use.

Off-road Equipment - Per URBEMIS output files.

Grading - Per URBEMIS output files.

Vehicle Trips - Per URBEMIS output files.

Vechicle Emission Factors -

Vechicle Emission Factors -

Vechicle Emission Factors -

Area Coating - Based on APCD recommendation

Energy Use - Based on 0.205 KW-h per machine

Water And Wastewater - Estimated indoor and outdoor use

Solid Waste - Based on EIS, user defined commercial incorporates hotel and restaurant.

Construction Off-road Equipment Mitigation -

Area Mitigation -

Energy Mitigation -

Table Name	Column Name	Default Value	New Value
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	150
tblAreaMitigation	UseLowVOCPaintNonresidentialExteriorValue	150	250
tblConstructionPhase	NumDays	20.00	316.00
tblConstructionPhase	NumDays	230.00	370.00
tblConstructionPhase	NumDays	20.00	34.00
tblConstructionPhase	NumDays	20.00	205.00

tblConstructionPhase	NumDays	10.00	32.00
tblConstructionPhase	PhaseEndDate	9/30/2019	12/31/2018
tblConstructionPhase	PhaseEndDate	1/1/2019	12/15/2018
tblConstructionPhase	PhaseEndDate	8/31/2017	8/1/2017
tblConstructionPhase	PhaseEndDate	9/27/2019	7/15/2018
tblConstructionPhase	PhaseEndDate	7/14/2017	7/15/2017
tblConstructionPhase	PhaseStartDate	7/16/2018	10/15/2017
tblConstructionPhase	PhaseStartDate	8/2/2017	7/15/2017
tblConstructionPhase	PhaseStartDate	7/16/2017	6/15/2017
tblConstructionPhase	PhaseStartDate	12/16/2018	10/1/2017
tblEnergyUse	LightingElect	0.00	3.00
tblEnergyUse	NT24E	0.00	6.60
tblEnergyUse	NT24NG	0.00	20.40
tblEnergyUse	T24E	0.00	19.06
tblEnergyUse	T24NG	0.00	40.20
tblGrading	AcresOfGrading	17.00	10.00
tblGrading	AcresOfGrading	16.00	0.00
tblLandUse	LandUseSquareFeet	0.00	174,240.00
tblLandUse	LotAcreage	0.00	4.00
tblLandUse	LotAcreage	5.33	2.00
tblLandUse	Population	0.00	5,418.00
tblLandUse	Population	0.00	596.00
tblLandUse	Population	0.00	330.00
tblOffRoadEquipment	HorsePower	226.00	399.00
tblOffRoadEquipment	HorsePower	89.00	145.00
tblOffRoadEquipment	HorsePower	84.00	49.00
tblOffRoadEquipment	HorsePower	125.00	100.00
tblOffRoadEquipment	HorsePower	130.00	104.00

tblOffRoadEquipment	HorsePower	80.00	95.00
tblOffRoadEquipment	HorsePower	255.00	357.00
tblOffRoadEquipment	HorsePower	255.00	357.00
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tblOffRoadEquipment	HorsePower	97.00	108.00
tblOffRoadEquipment	HorsePower	97.00	108.00
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tblOffRoadEquipment	HorsePower	400.00	189.00
tblOffRoadEquipment	HorsePower	400.00	189.00
tblOffRoadEquipment	LoadFactor	0.29	0.43
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tblOffRoadEquipment	LoadFactor	0.37	0.55
tblOffRoadEquipment	LoadFactor	0.37	0.55
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tblOffRoadEquipment	LoadFactor	0.38	0.50
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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblProjectCharacteristics	OperationalYear	2014	2019
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	69.73	0.00
tblSolidWaste	SolidWasteGenerationRate	87.60	0.00
tblSolidWaste	SolidWasteGenerationRate	0.00	2,748.00
tblTripsAndVMT	WorkerTripNumber	15.00	13.00
tblVehicleTrips	CC_TL	6.60	30.00
tblVehicleTrips	CC_TL	6.60	30.00
tblVehicleTrips	CC_TTP	72.50	5.00
tblVehicleTrips	CC_TTP	61.60	5.00
tblVehicleTrips	CC_TTP	0.00	2.00
tblVehicleTrips	CNW_TL	6.60	30.00
tblVehicleTrips	CNW_TL	6.60	30.00
tblVehicleTrips	CNW_TL	6.60	30.00

tblVehicleTrips	CNW_TTP	19.00	92.50
tblVehicleTrips	CNW_TTP	19.00	92.50
tblVehicleTrips	CNW_TTP	0.00	97.00
tblVehicleTrips	CW_TL	14.70	30.00
tblVehicleTrips	CW_TL	14.70	30.00
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tblVehicleTrips	CW_TTP	8.50	2.50
tblVehicleTrips	CW_TTP	19.40	2.50
tblVehicleTrips	CW_TTP	0.00	1.00
tblVehicleTrips	DV_TP	20.00	0.00
tblVehicleTrips	DV_TP	38.00	0.00
tblVehicleTrips	PB_TP	43.00	20.00
tblVehicleTrips	PB_TP	4.00	0.00
tblVehicleTrips	PB_TP	0.00	40.00
tblVehicleTrips	PR_TP	37.00	80.00
tblVehicleTrips	PR_TP	58.00	100.00
tblVehicleTrips	PR_TP	0.00	60.00
tblVehicleTrips	ST_TR	8.19	2.05
tblVehicleTrips	ST_TR	0.00	59.07
tblVehicleTrips	SU_TR	131.84	127.15
tblVehicleTrips	SU_TR	5.95	2.06
tblVehicleTrips	SU_TR	0.00	39.43
tblVehicleTrips	WD_TR	8.17	2.06
tblVehicleTrips	WD_TR	0.00	39.43
tblWater	IndoorWaterUseRate	0.00	66,130,335.00
tblWater	OutdoorWaterUseRate	0.00	7,347,815.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2017	1.7545	5.7318	5.6239	7.6800e-003	0.3694	0.3272	0.6966	0.1542	0.3054	0.4596	0.0000	653.0397	653.0397	0.1372	0.0000	655.9216
2018	5.3631	7.2874	8.8672	0.0134	0.3623	0.4177	0.7800	0.0972	0.3943	0.4914	0.0000	1,093.6035	1,093.6035	0.1937	0.0000	1,097.6715
Total	7.1176	13.0192	14.4911	0.0211	0.7317	0.7449	1.4766	0.2513	0.6997	0.9511	0.0000	1,746.6431	1,746.6431	0.3309	0.0000	1,753.5930

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2017	1.7538	5.7255	5.6192	7.6700e-003	0.2572	0.3268	0.5840	0.0938	0.3051	0.3989	0.0000	652.4884	652.4884	0.1371	0.0000	655.3671
2018	5.3621	7.2796	8.8606	0.0134	0.3623	0.4172	0.7795	0.0972	0.3938	0.4910	0.0000	1,092.7753	1,092.7753	0.1935	0.0000	1,096.8389
Total	7.1159	13.0051	14.4798	0.0211	0.6195	0.7440	1.3635	0.1909	0.6989	0.8899	0.0000	1,745.2637	1,745.2637	0.3306	0.0000	1,752.2059

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.02	0.11	0.08	0.09	15.34	0.12	7.66	24.03	0.12	6.44	0.00	0.08	0.08	0.11	0.00	0.08

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Area	2.0412	3.0000e-005	3.6600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003	
Energy	0.1445	1.3136	1.1035	7.8800e-003		0.0998	0.0998		0.0998	0.0998	0.0000	4,294.5521	4,294.5521	0.1591	0.0535	4,314.4654	
Mobile	42.3366	50.5436	202.3854	0.4269	28.0586	0.9733	29.0320	7.5033	0.8961	8.3995	0.0000	31,593.7229	31,593.7229	1.1310	0.0000	31,617.4739	
Waste						0.0000	0.0000		0.0000	0.0000	557.8192	0.0000	557.8192	32.9662	0.0000	1,250.1087	
Water						0.0000	0.0000		0.0000	0.0000	22.8320	293.3204	316.1524	2.3586	0.0582	383.7122	
Total	44.5223	51.8573	203.4926	0.4348	28.0586	1.0732	29.1318	7.5033	0.9960	8.4993	580.6512	36,181.6025	36,762.2537	36.6148	0.1116	37,565.7676	

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Area	2.0890	3.0000e-005	3.6600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003	
Energy	0.1162	1.0567	0.8876	6.3400e-003		0.0803	0.0803		0.0803	0.0803	0.0000	3,639.4256	3,639.4256	0.1365	0.0448	3,656.1674	
Mobile	42.3366	50.5436	202.3854	0.4269	28.0586	0.9733	29.0320	7.5033	0.8961	8.3995	0.0000	31,593.7229	31,593.7229	1.1310	0.0000	31,617.4739	
Waste						0.0000	0.0000		0.0000	0.0000	557.8192	0.0000	557.8192	32.9662	0.0000	1,250.1087	
Water						0.0000	0.0000		0.0000	0.0000	22.8320	293.3204	316.1524	2.3581	0.0581	383.6757	
Total	44.5418	51.6003	203.2767	0.4332	28.0586	1.0537	29.1123	7.5033	0.9764	8.4798	580.6512	35,526.4759	36,107.1271	36.5918	0.1028	36,907.4332	

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	-0.04	0.50	0.11	0.35	0.00	1.82	0.07	0.00	1.96	0.23	0.00	1.81	1.78	0.06	7.87	1.75

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/1/2017	7/15/2017	5	32	
2	Grading	Grading	6/15/2017	8/1/2017	5	34	
3	Building Construction	Building Construction	7/15/2017	12/15/2018	5	370	
4	Paving	Paving	10/1/2017	7/15/2018	5	205	
5	Architectural Coating	Architectural Coating	10/15/2017	12/31/2018	5	316	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 10

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 618,630; Non-Residential Outdoor: 206,210

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Graders	1	8.00	174	0.61
Site Preparation	Off-Highway Trucks	1	8.00	189	0.50
Site Preparation	Rubber Tired Dozers	1	8.00	357	0.59
Site Preparation	Tractors/Loaders/Backhoes	2	7.00	108	0.55
Grading	Excavators	1	8.00	162	0.38
Grading	Graders	1	8.00	174	0.61
Grading	Off-Highway Trucks	1	8.00	189	0.50
Grading	Rubber Tired Dozers	1	8.00	357	0.59
Grading	Tractors/Loaders/Backhoes	2	7.00	108	0.55
Building Construction	Cranes	1	6.00	399	0.43
Building Construction	Forklifts	2	6.00	145	0.30
Building Construction	Generator Sets	2	8.00	49	0.74
Building Construction	Tractors/Loaders/Backhoes	3	8.00	108	0.55
Building Construction	Welders	3	8.00	45	0.45
Paving	Cement and Mortar Mixers	4	6.00	10	0.56
Paving	Pavers	1	7.00	100	0.62
Paving	Paving Equipment	2	6.00	104	0.53
Paving	Rollers	1	7.00	95	0.56
Architectural Coating	Air Compressors	2	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	5	13.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	13.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	11	156.00	68.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	31.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Site Preparation - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr											MT/yr				
Fugitive Dust					0.0964	0.0000	0.0964	0.0530	0.0000	0.0530	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0878	0.9229	0.6013	7.1000e-004		0.0488	0.0488		0.0449	0.0449	0.0000	66.3953	66.3953	0.0203	0.0000	66.8226
Total	0.0878	0.9229	0.6013	7.1000e-004	0.0964	0.0488	0.1451	0.0530	0.0449	0.0978	0.0000	66.3953	66.3953	0.0203	0.0000	66.8226

3.2 Site Preparation - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	
Total	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0434	0.0000	0.0434	0.0238	0.0000	0.0238	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0877	0.9218	0.6006	7.1000e-004		0.0487	0.0487		0.0448	0.0448	0.0000	66.3164	66.3164	0.0203	0.0000	66.7431
Total	0.0877	0.9218	0.6006	7.1000e-004	0.0434	0.0487	0.0921	0.0238	0.0448	0.0687	0.0000	66.3164	66.3164	0.0203	0.0000	66.7431

3.2 Site Preparation - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	
Total	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	

3.3 Grading - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1077	0.0000	0.1077	0.0569	0.0000	0.0569	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0995	1.0489	0.6970	8.5000e-004		0.0552	0.0552		0.0508	0.0508	0.0000	78.8925	78.8925	0.0242	0.0000	79.4001
Total	0.0995	1.0489	0.6970	8.5000e-004	0.1077	0.0552	0.1629	0.0569	0.0508	0.1076	0.0000	78.8925	78.8925	0.0242	0.0000	79.4001

3.3 Grading - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	
Total	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Fugitive Dust					0.0485	0.0000	0.0485	0.0256	0.0000	0.0256	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0993	1.0477	0.6962	8.5000e-004		0.0551	0.0551		0.0507	0.0507	0.0000	78.7986	78.7986	0.0241	0.0000	79.3056	
Total	0.0993	1.0477	0.6962	8.5000e-004	0.0485	0.0551	0.1036	0.0256	0.0507	0.0763	0.0000	78.7986	78.7986	0.0241	0.0000	79.3056	

3.3 Grading - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	
Total	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	

3.4 Building Construction - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.3516	2.6430	2.1007	2.9100e-003		0.1618	0.1618		0.1524	0.1524	0.0000	251.5099	251.5099	0.0683	0.0000	252.9441
Total	0.3516	2.6430	2.1007	2.9100e-003		0.1618	0.1618		0.1524	0.1524	0.0000	251.5099	251.5099	0.0683	0.0000	252.9441

3.4 Building Construction - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1006	0.2809	0.7485	8.1000e-004	0.0239	6.8300e-003	0.0307	6.7900e-003	6.2800e-003	0.0131	0.0000	72.1334	72.1334	4.2000e-004	0.0000	72.1422	
Worker	0.1633	0.0894	0.7849	1.3500e-003	0.1173	7.6000e-004	0.1180	0.0312	7.0000e-004	0.0318	0.0000	97.4010	97.4010	6.1500e-003	0.0000	97.5302	
Total	0.2640	0.3703	1.5335	2.1600e-003	0.1412	7.5900e-003	0.1488	0.0379	6.9800e-003	0.0449	0.0000	169.5344	169.5344	6.5700e-003	0.0000	169.6724	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.3511	2.6399	2.0982	2.9100e-003		0.1616	0.1616		0.1522	0.1522	0.0000	251.2107	251.2107	0.0682	0.0000	252.6432	
Total	0.3511	2.6399	2.0982	2.9100e-003		0.1616	0.1616		0.1522	0.1522	0.0000	251.2107	251.2107	0.0682	0.0000	252.6432	

3.4 Building Construction - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1006	0.2809	0.7485	8.1000e-004	0.0239	6.8300e-003	0.0307	6.7900e-003	6.2800e-003	0.0131	0.0000	72.1334	72.1334	4.2000e-004	0.0000	72.1422	
Worker	0.1633	0.0894	0.7849	1.3500e-003	0.1173	7.6000e-004	0.1180	0.0312	7.0000e-004	0.0318	0.0000	97.4010	97.4010	6.1500e-003	0.0000	97.5302	
Total	0.2640	0.3703	1.5335	2.1600e-003	0.1412	7.5900e-003	0.1488	0.0379	6.9800e-003	0.0449	0.0000	169.5344	169.5344	6.5700e-003	0.0000	169.6724	

3.4 Building Construction - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.6367	4.8991	4.1850	6.0700e-003		0.2855	0.2855		0.2692	0.2692	0.0000	517.9192	517.9192	0.1389	0.0000	520.8366	
Total	0.6367	4.8991	4.1850	6.0700e-003		0.2855	0.2855		0.2692	0.2692	0.0000	517.9192	517.9192	0.1389	0.0000	520.8366	

3.4 Building Construction - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1855	0.5248	1.4466	1.6900e-003	0.0497	0.0133	0.0630	0.0142	0.0122	0.0263	0.0000	147.6743	147.6743	8.5000e-004	0.0000	147.6922	
Worker	0.3070	0.1679	1.4532	2.8200e-003	0.2443	1.5200e-003	0.2459	0.0649	1.4100e-003	0.0663	0.0000	195.2556	195.2556	0.0118	0.0000	195.5033	
Total	0.4925	0.6927	2.8997	4.5100e-003	0.2941	0.0148	0.3089	0.0790	0.0136	0.0926	0.0000	342.9299	342.9299	0.0126	0.0000	343.1954	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.6359	4.8933	4.1800	6.0600e-003		0.2851	0.2851		0.2689	0.2689	0.0000	517.3031	517.3031	0.1388	0.0000	520.2171	
Total	0.6359	4.8933	4.1800	6.0600e-003		0.2851	0.2851		0.2689	0.2689	0.0000	517.3031	517.3031	0.1388	0.0000	520.2171	

3.4 Building Construction - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1855	0.5248	1.4466	1.6900e-003	0.0497	0.0133	0.0630	0.0142	0.0122	0.0263	0.0000	147.6743	147.6743	8.5000e-004	0.0000	147.6922	
Worker	0.3070	0.1679	1.4532	2.8200e-003	0.2443	1.5200e-003	0.2459	0.0649	1.4100e-003	0.0663	0.0000	195.2556	195.2556	0.0118	0.0000	195.5033	
Total	0.4925	0.6927	2.8997	4.5100e-003	0.2941	0.0148	0.3089	0.0790	0.0136	0.0926	0.0000	342.9299	342.9299	0.0126	0.0000	343.1954	

3.5 Paving - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.0680	0.6081	0.4267	5.9000e-004		0.0442	0.0442		0.0408	0.0408	0.0000	52.5653	52.5653	0.0151	0.0000	52.8824	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0680	0.6081	0.4267	5.9000e-004		0.0442	0.0442		0.0408	0.0408	0.0000	52.5653	52.5653	0.0151	0.0000	52.8824	

3.5 Paving - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	
Total	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.0679	0.6074	0.4262	5.9000e-004		0.0441	0.0441		0.0407	0.0407	0.0000	52.5028	52.5028	0.0151	0.0000	52.8195	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0679	0.6074	0.4262	5.9000e-004		0.0441	0.0441		0.0407	0.0407	0.0000	52.5028	52.5028	0.0151	0.0000	52.8195	

3.5 Paving - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	
Total	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	

3.5 Paving - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.1231	1.1253	0.8928	1.2700e-003		0.0777	0.0777		0.0718	0.0718	0.0000	111.5879	111.5879	0.0325	0.0000	112.2708	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.1231	1.1253	0.8928	1.2700e-003		0.0777	0.0777		0.0718	0.0718	0.0000	111.5879	111.5879	0.0325	0.0000	112.2708	

3.5 Paving - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361	
Total	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.1230	1.1239	0.8917	1.2700e-003		0.0777	0.0777		0.0717	0.0717	0.0000	111.4552	111.4552	0.0325	0.0000	112.1373	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.1230	1.1239	0.8917	1.2700e-003		0.0777	0.0777		0.0717	0.0717	0.0000	111.4552	111.4552	0.0325	0.0000	112.1373	

3.5 Paving - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e		
Category	tons/yr												MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361		
Total	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361		

3.6 Architectural Coating - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Archit. Coating	0.8318						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0183	0.1202	0.1027	1.6000e-004			9.5300e-003	9.5300e-003		9.5300e-003	9.5300e-003	0.0000	14.0429	14.0429	1.4800e-003	0.0000	14.0740
Total	0.8501	0.1202	0.1027	1.6000e-004			9.5300e-003	9.5300e-003		9.5300e-003	9.5300e-003	0.0000	14.0429	14.0429	1.4800e-003	0.0000	14.0740

3.6 Architectural Coating - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	
Total	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Archit. Coating	0.8318						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0183	0.1200	0.1026	1.6000e-004		9.5200e-003	9.5200e-003		9.5200e-003	9.5200e-003	0.0000	14.0262	14.0262	1.4800e-003	0.0000	14.0573	
Total	0.8500	0.1200	0.1026	1.6000e-004		9.5200e-003	9.5200e-003		9.5200e-003	9.5200e-003	0.0000	14.0262	14.0262	1.4800e-003	0.0000	14.0573	

3.6 Architectural Coating - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	
Total	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	

3.6 Architectural Coating - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Archit. Coating	3.9471						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0779	0.5235	0.4840	7.8000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.6400	66.6400	6.3300e-003	0.0000	66.7730	
Total	4.0251	0.5235	0.4840	7.8000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.6400	66.6400	6.3300e-003	0.0000	66.7730	

3.6 Architectural Coating - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	
Total	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Archit. Coating	3.9471						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0779	0.5229	0.4834	7.7000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.5608	66.5608	6.3200e-003	0.0000	66.6936	
Total	4.0250	0.5229	0.4834	7.7000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.5608	66.5608	6.3200e-003	0.0000	66.6936	

3.6 Architectural Coating - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	
Total	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	42.3366	50.5436	202.3854	0.4269	28.0586	0.9733	29.0320	7.5033	0.8961	8.3995	0.0000	31,593.72 29	31,593.72 29	1.1310	0.0000	31,617.47 39
Unmitigated	42.3366	50.5436	202.3854	0.4269	28.0586	0.9733	29.0320	7.5033	0.8961	8.3995	0.0000	31,593.72 29	31,593.72 29	1.1310	0.0000	31,617.47 39

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
High Turnover (Sit Down Restaurant)	745.10	928.05	745.10	6,743,120	6,743,120
Hotel	329.60	328.00	329.60	3,596,736	3,596,736
User Defined Commercial	9,030.26	13,528.21	9,030.26	63,517,174	63,517,174
Total	10,104.96	14,784.26	10,104.96	73,857,031	73,857,031

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
High Turnover (Sit Down)	30.00	30.00	30.00	2.50	5.00	92.50	80	0	20
Hotel	30.00	30.00	30.00	2.50	5.00	92.50	100	0	0
User Defined Commercial	30.00	30.00	30.00	1.00	2.00	97.00	60	0	40

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.432494	0.068575	0.183624	0.160239	0.046129	0.007778	0.006784	0.077842	0.000817	0.001136	0.010310	0.000579	0.003693

5.0 Energy Detail

5.1 Fleet Mix

Historical Energy Use: N

5.1 Mitigation Measures Energy

Exceed Title 24

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,489.101	2,489.101	0.1144	0.0237	2,498.842	
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,864.504	2,864.504	0.1317	0.0272	2,875.714	
NaturalGas Mitigated	0.1162	1.0567	0.8876	6.3400e-003		0.0803	0.0803		0.0803	0.0803	0.0000	1,150.323	1,150.323	0.0221	0.0211	1,157.324	
NaturalGas Unmitigated	0.1445	1.3136	1.1035	7.8800e-003		0.0998	0.0998		0.0998	0.0998	0.0000	1,430.047	1,430.047	0.0274	0.0262	1,438.750	

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Land Use	kBTU/yr	tons/yr											MT/yr					
Hotel	1.46129e+007	0.0788	0.7163	0.6017	4.3000e-003		0.0544	0.0544		0.0544	0.0544	0.0000	779.8015	779.8015	0.0150	0.0143	784.5472	
User Defined Commercial	1.05589e+007	0.0569	0.5176	0.4348	3.1100e-003		0.0393	0.0393		0.0393	0.0393	0.0000	563.4655	563.4655	0.0108	0.0103	566.8946	
High Turnover (Sit Down Restaurant)	1.62621e+006	8.7700e-003	0.0797	0.0670	4.8000e-004		6.0600e-003	6.0600e-003		6.0600e-003	6.0600e-003	0.0000	86.7807	86.7807	1.6600e-003	1.5900e-003	87.3088	
Total		0.1445	1.3136	1.1035	7.8900e-003		0.0998	0.0998		0.0998	0.0998	0.0000	1,430.047	1,430.047	0.0274	0.0262	1,438.750	

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr											MT/yr				
User Defined Commercial	8.80783e+006	0.0475	0.4318	0.3627	2.5900e-003		0.0328	0.0328		0.0328	0.0328	0.0000	470.0195	470.0195	9.0100e-003	8.6200e-003	472.8799
High Turnover (Sit Down Restaurant)	1.50646e+006	8.1200e-003	0.0739	0.0620	4.4000e-004		5.6100e-003	5.6100e-003		5.6100e-003	5.6100e-003	0.0000	80.3904	80.3904	1.5400e-003	1.4700e-003	80.8797
Hotel	1.1242e+007	0.0606	0.5511	0.4629	3.3100e-003		0.0419	0.0419		0.0419	0.0419	0.0000	599.9141	599.9141	0.0115	0.0110	603.5650
Total		0.1162	1.0567	0.8876	6.3400e-003		0.0803	0.0803		0.0803	0.0803	0.0000	1,150.3239	1,150.3239	0.0221	0.0211	1,157.3246

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
High Turnover (Sit Down Restaurant)	307064	87.8716	4.0400e-003	8.4000e-004	88.2154
Hotel	4.70913e+006	1,347.5961	0.0619	0.0128	1,352.8699
User Defined Commercial	4.99372e+006	1,429.0369	0.0657	0.0136	1,434.6294
Total		2,864.5045	0.1317	0.0273	2,875.7148

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
High Turnover (Sit Down Restaurant)	284899	81.5285	3.7500e-003	7.8000e-004	81.8476
Hotel	4.24971e+006	1,216.1273	0.0559	0.0116	1,220.8867
User Defined Commercial	4.16346e+006	1,191.4458	0.0548	0.0113	1,196.1085
Total		2,489.1016	0.1144	0.0237	2,498.8428

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Residential Exterior

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Mitigated	2.0890	3.0000e-005	3.6600e-003	0.0000		1.0000e-005	1.0000e-005	1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003		
Unmitigated	2.0412	3.0000e-005	3.6600e-003	0.0000		1.0000e-005	1.0000e-005	1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003		

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4301					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.6107					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	3.5000e-004	3.0000e-005	3.6600e-003	0.0000		1.0000e-005	1.0000e-005	1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003	
Total	2.0412	3.0000e-005	3.6600e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
SubCategory	tons/yr										MT/yr						
Architectural Coating	0.4779						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Consumer Products	1.6107						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Landscaping	3.5000e-004	3.0000e-005	3.6600e-003	0.0000			1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003
Total	2.0890	3.0000e-005	3.6600e-003	0.0000			1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	7.0600e-003	7.0600e-003	2.0000e-005	0.0000	7.4600e-003

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	316.1524	2.3581	0.0581	383.6757
Unmitigated	316.1524	2.3586	0.0582	383.7122

7.2 Water by Land Use

Unmitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
High Turnover (Sit Down Restaurant)	1.77871 / 0.113535	7.5531	0.0583	1.4400e- 003	9.2218
Hotel	4.05868 / 0.450965	17.8448	0.1330	3.2800e- 003	21.6549
User Defined Commercial	66.1303 / 7.34781	290.7546	2.1673	0.0535	352.8354
Total		316.1524	2.3586	0.0582	383.7122

Mitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
High Turnover (Sit Down Restaurant)	1.77871 / 0.113535	7.5531	0.0583	1.4300e- 003	9.2209
Hotel	4.05868 / 0.450965	17.8448	0.1330	3.2800e- 003	21.6529
User Defined Commercial	66.1303 / 7.34781	290.7546	2.1669	0.0534	352.8020
Total		316.1524	2.3581	0.0581	383.6757

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
MT/yr				
Mitigated	557.8192	32.9662	0.0000	1,250.108 7
Unmitigated	557.8192	32.9662	0.0000	1,250.108 7

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
High Turnover (Sit Down Restaurant)	0	0.0000	0.0000	0.0000	0.0000
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	2748	557.8192	32.9662	0.0000	1,250.108 7
Total		557.8192	32.9662	0.0000	1,250.108 7

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
High Turnover (Sit Down Restaurant)	0	0.0000	0.0000	0.0000	0.0000
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	2748	557.8192	32.9662	0.0000	1,250.1087
Total		557.8192	32.9662	0.0000	1,250.1087

9.0 Operational Offroad

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

ALTERNATIVE B

Barstow Alt. B
San Bernardino-Mojave Desert County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Commercial	164.40	User Defined Unit	11.00	164,400.00	4200
High Turnover (Sit Down Restaurant)	5.86	1000sqft	0.13	5,860.00	596
Hotel	100.00	Room	3.33	145,200.00	0

1.2 Other Project Characteristics

Urbanization	Rural	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	32
Climate Zone	10			Operational Year	2019
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	630.89	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - based on project description and 1.6 persons per trip.

Construction Phase - Estimated construction phases.

Off-road Equipment - Estimated equipment use.

Off-road Equipment - Per URBEMIS output files.

Grading - Per URBEMIS output files.

Vehicle Trips - Per URBEMIS output files.

Vechicle Emission Factors -

Vechicle Emission Factors -

Vechicle Emission Factors -

Area Coating - APCD recommendations.

Energy Use - Based on similar projects.

Water And Wastewater - Based on Table 2-2 of the EIS, 90% indoors and 10% outdoor water use.

Solid Waste - Based on EIS, User defined Commercial includes Hotel and restaurant.

Construction Off-road Equipment Mitigation -

Area Mitigation -

Energy Mitigation -

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Nonresidential_Exterior	157,730.00	206,210.00
tblArchitecturalCoating	ConstArea_Nonresidential_Interior	473,190.00	618,630.00
tblAreaCoating	Area_EF_Nonresidential_Exterior	250	150
tblAreaCoating	Area_Nonresidential_Interior	473190	618630
tblAreaMitigation	UseLowVOCPaintNonresidentialExteriorValue	150	250
tblConstructionPhase	NumDays	20.00	316.00

tblConstructionPhase	NumDays	300.00	370.00
tblConstructionPhase	NumDays	30.00	34.00
tblConstructionPhase	NumDays	20.00	205.00
tblConstructionPhase	NumDays	10.00	32.00
tblConstructionPhase	PhaseEndDate	9/30/2019	12/31/2018
tblConstructionPhase	PhaseEndDate	1/1/2019	12/15/2018
tblConstructionPhase	PhaseEndDate	8/31/2017	8/1/2017
tblConstructionPhase	PhaseEndDate	9/27/2019	7/15/2018
tblConstructionPhase	PhaseEndDate	7/14/2017	7/15/2017
tblConstructionPhase	PhaseStartDate	7/16/2018	10/15/2017
tblConstructionPhase	PhaseStartDate	8/2/2017	7/15/2017
tblConstructionPhase	PhaseStartDate	7/16/2017	6/15/2017
tblConstructionPhase	PhaseStartDate	12/16/2018	10/1/2017
tblEnergyUse	LightingElect	0.00	3.00
tblEnergyUse	NT24E	0.00	6.60
tblEnergyUse	NT24NG	0.00	20.40
tblEnergyUse	T24E	0.00	19.06
tblEnergyUse	T24NG	0.00	40.20
tblGrading	AcresOfGrading	85.00	10.00
tblGrading	AcresOfGrading	16.00	0.00
tblLandUse	LandUseSquareFeet	0.00	164,400.00
tblLandUse	LotAcreage	0.00	11.00
tblLandUse	Population	0.00	4,200.00
tblLandUse	Population	0.00	596.00
tblOffRoadEquipment	HorsePower	226.00	399.00
tblOffRoadEquipment	HorsePower	89.00	145.00
tblOffRoadEquipment	HorsePower	84.00	49.00
tblOffRoadEquipment	HorsePower	125.00	100.00

tblOffRoadEquipment	HorsePower	130.00	104.00
tblOffRoadEquipment	HorsePower	80.00	95.00
tblOffRoadEquipment	HorsePower	255.00	357.00
tblOffRoadEquipment	HorsePower	255.00	357.00
tblOffRoadEquipment	HorsePower	97.00	108.00
tblOffRoadEquipment	HorsePower	97.00	108.00
tblOffRoadEquipment	HorsePower	97.00	108.00
tblOffRoadEquipment	HorsePower	46.00	45.00
tblOffRoadEquipment	HorsePower	9.00	10.00
tblOffRoadEquipment	HorsePower	400.00	189.00
tblOffRoadEquipment	HorsePower	400.00	189.00
tblOffRoadEquipment	LoadFactor	0.29	0.43
tblOffRoadEquipment	LoadFactor	0.20	0.30
tblOffRoadEquipment	LoadFactor	0.41	0.61
tblOffRoadEquipment	LoadFactor	0.42	0.62
tblOffRoadEquipment	LoadFactor	0.36	0.53
tblOffRoadEquipment	LoadFactor	0.38	0.56
tblOffRoadEquipment	LoadFactor	0.40	0.59
tblOffRoadEquipment	LoadFactor	0.40	0.59
tblOffRoadEquipment	LoadFactor	0.37	0.55
tblOffRoadEquipment	LoadFactor	0.37	0.55
tblOffRoadEquipment	LoadFactor	0.41	0.61
tblOffRoadEquipment	LoadFactor	0.38	0.50
tblOffRoadEquipment	LoadFactor	0.38	0.50
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	6.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblOffRoadEquipment	UsageHours	8.00	7.00
tblProjectCharacteristics	OperationalYear	2014	2019
tblProjectCharacteristics	UrbanizationLevel	Urban	Rural
tblSolidWaste	SolidWasteGenerationRate	69.73	0.00
tblSolidWaste	SolidWasteGenerationRate	54.75	0.00
tblSolidWaste	SolidWasteGenerationRate	0.00	2,748.00
tblTripsAndVMT	VendorTripNumber	52.00	68.00
tblTripsAndVMT	WorkerTripNumber	20.00	13.00
tblTripsAndVMT	WorkerTripNumber	116.00	156.00
tblTripsAndVMT	WorkerTripNumber	23.00	31.00
tblVehicleTrips	CC_TL	6.60	30.00
tblVehicleTrips	CC_TL	6.60	30.00
tblVehicleTrips	CC_TL	6.60	30.00
tblVehicleTrips	CC_TTP	72.50	5.00
tblVehicleTrips	CC_TTP	61.60	5.00

tblVehicleTrips	CC_TTP	0.00	2.00
tblVehicleTrips	CNW_TL	6.60	30.00
tblVehicleTrips	CNW_TL	6.60	30.00
tblVehicleTrips	CNW_TL	6.60	30.00
tblVehicleTrips	CNW_TTP	19.00	92.50
tblVehicleTrips	CNW_TTP	19.00	92.50
tblVehicleTrips	CNW_TTP	0.00	97.00
tblVehicleTrips	CW_TL	14.70	30.00
tblVehicleTrips	CW_TL	14.70	30.00
tblVehicleTrips	CW_TL	14.70	30.00
tblVehicleTrips	CW_TTP	8.50	2.50
tblVehicleTrips	CW_TTP	19.40	2.50
tblVehicleTrips	CW_TTP	0.00	1.00
tblVehicleTrips	DV_TP	20.00	0.00
tblVehicleTrips	DV_TP	38.00	0.00
tblVehicleTrips	PB_TP	43.00	20.00
tblVehicleTrips	PB_TP	4.00	0.00
tblVehicleTrips	PB_TP	0.00	40.00
tblVehicleTrips	PR_TP	37.00	80.00
tblVehicleTrips	PR_TP	58.00	100.00
tblVehicleTrips	PR_TP	0.00	60.00
tblVehicleTrips	ST_TR	8.19	2.05
tblVehicleTrips	ST_TR	0.00	59.07
tblVehicleTrips	SU_TR	131.84	127.15
tblVehicleTrips	SU_TR	5.95	2.06
tblVehicleTrips	SU_TR	0.00	39.43
tblVehicleTrips	WD_TR	8.17	2.06
tblVehicleTrips	WD_TR	0.00	39.43

tblWater	IndoorWaterUseRate	2,536,677.00	4,058,683.20
tblWater	IndoorWaterUseRate	0.00	43,628,085.00
tblWater	OutdoorWaterUseRate	281,853.00	450,964.80
tblWater	OutdoorWaterUseRate	0.00	4,848,565.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Year	tons/yr											MT/yr					
2017	1.7987	6.2867	5.9706	8.1800e-003	0.3694	0.3494	0.7188	0.1542	0.3259	0.4801	0.0000	700.0264	700.0264	0.1516	0.0000	703.2106	
2018	5.3631	7.2874	8.8672	0.0134	0.3623	0.4177	0.7800	0.0972	0.3943	0.4914	0.0000	1,093.6035	1,093.6035	0.1937	0.0000	1,097.6715	
Total	7.1618	13.5741	14.8378	0.0216	0.7317	0.7672	1.4988	0.2513	0.7202	0.9715	0.0000	1,793.6298	1,793.6298	0.3453	0.0000	1,800.8821	

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Year	tons/yr											MT/yr					
2017	1.7979	6.2796	5.9655	8.1700e-003	0.2572	0.3490	0.6062	0.0938	0.3255	0.4193	0.0000	699.4192	699.4192	0.1515	0.0000	702.5999	
2018	5.3621	7.2796	8.8606	0.0134	0.3623	0.4172	0.7795	0.0972	0.3938	0.4910	0.0000	1,092.7753	1,092.7753	0.1935	0.0000	1,096.8389	
Total	7.1600	13.5593	14.8261	0.0216	0.6195	0.7663	1.3857	0.1909	0.7194	0.9103	0.0000	1,792.1945	1,792.1945	0.3450	0.0000	1,799.4387	

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.02	0.11	0.08	0.09	15.34	0.11	7.55	24.03	0.12	6.30	0.00	0.08	0.08	0.11	0.00	0.08

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Area	1.6455	2.0000e-005	2.5100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003	
Energy	0.1117	1.0158	0.8533	6.0900e-003		0.0772	0.0772		0.0772	0.0772	0.0000	3,384.2538	3,384.2538	0.1259	0.0419	3,399.9003	
Mobile	31.2759	37.3364	149.3770	0.3155	20.7376	0.7193	21.4569	5.5456	0.6622	6.2078	0.0000	23,348.5910	23,348.5910	0.8357	0.0000	23,366.1402	
Waste						0.0000	0.0000		0.0000	0.0000	557.8192	0.0000	557.8192	32.9662	0.0000	1,250.1087	
Water						0.0000	0.0000		0.0000	0.0000	15.6931	201.5271	217.2202	1.6211	0.0400	263.6556	
Total	33.0332	38.3522	150.2327	0.3216	20.7376	0.7965	21.5341	5.5456	0.7395	6.2850	573.5123	26,934.3767	27,507.8890	35.5489	0.0819	28,279.8099	

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Area	1.6821	2.0000e-005	2.5100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003	
Energy	0.0908	0.8256	0.6935	4.9500e-003		0.0628	0.0628		0.0628	0.0628	0.0000	2,864.5807	2,864.5807	0.1076	0.0352	2,877.7438	
Mobile	31.2759	37.3364	149.3770	0.3155	20.7376	0.7193	21.4569	5.5456	0.6622	6.2078	0.0000	23,348.5910	23,348.5910	0.8357	0.0000	23,366.1402	
Waste						0.0000	0.0000		0.0000	0.0000	557.8192	0.0000	557.8192	32.9662	0.0000	1,250.1087	
Water						0.0000	0.0000		0.0000	0.0000	15.6931	201.5271	217.2202	1.6208	0.0399	263.6306	
Total	33.0488	38.1621	150.0730	0.3204	20.7376	0.7821	21.5197	5.5456	0.7250	6.2706	573.5123	26,414.7036	26,988.2159	35.5303	0.0751	27,757.6284	

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	-0.05	0.50	0.11	0.35	0.00	1.81	0.07	0.00	1.95	0.23	0.00	1.93	1.89	0.05	8.35	1.85

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	6/1/2017	7/15/2017	5	32	
2	Grading	Grading	6/15/2017	8/1/2017	5	34	
3	Building Construction	Building Construction	7/15/2017	12/15/2018	5	370	
4	Paving	Paving	10/1/2017	7/15/2018	5	205	
5	Architectural Coating	Architectural Coating	10/15/2017	12/31/2018	5	316	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 10

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 618,630; Non-Residential Outdoor: 206,210

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Graders	1	8.00	174	0.61
Site Preparation	Off-Highway Trucks	1	8.00	189	0.50
Site Preparation	Rubber Tired Dozers	1	8.00	357	0.59
Site Preparation	Tractors/Loaders/Backhoes	2	7.00	108	0.55
Grading	Excavators	1	8.00	162	0.38
Grading	Graders	1	8.00	174	0.61
Grading	Off-Highway Trucks	1	8.00	189	0.50
Grading	Rubber Tired Dozers	1	8.00	357	0.59
Grading	Scrapers	2	8.00	361	0.48
Grading	Tractors/Loaders/Backhoes	2	7.00	108	0.55
Building Construction	Cranes	1	6.00	399	0.43
Building Construction	Forklifts	2	6.00	145	0.30
Building Construction	Generator Sets	2	8.00	49	0.74
Building Construction	Tractors/Loaders/Backhoes	3	8.00	108	0.55
Building Construction	Welders	3	8.00	45	0.45
Paving	Cement and Mortar Mixers	4	6.00	10	0.56
Paving	Pavers	1	7.00	100	0.62
Paving	Paving Equipment	2	6.00	104	0.53
Paving	Rollers	1	7.00	95	0.56
Architectural Coating	Air Compressors	2	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	5	13.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	13.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	11	156.00	68.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	31.00	0.00	0.00	16.80	6.60	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

3.2 Site Preparation - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr											MT/yr				
Fugitive Dust					0.0964	0.0000	0.0964	0.0530	0.0000	0.0530	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0878	0.9229	0.6013	7.1000e-004		0.0488	0.0488		0.0449	0.0449	0.0000	66.3953	66.3953	0.0203	0.0000	66.8226
Total	0.0878	0.9229	0.6013	7.1000e-004	0.0964	0.0488	0.1451	0.0530	0.0449	0.0978	0.0000	66.3953	66.3953	0.0203	0.0000	66.8226

3.2 Site Preparation - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	
Total	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0434	0.0000	0.0434	0.0238	0.0000	0.0238	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0877	0.9218	0.6006	7.1000e-004		0.0487	0.0487		0.0448	0.0448	0.0000	66.3164	66.3164	0.0203	0.0000	66.7431
Total	0.0877	0.9218	0.6006	7.1000e-004	0.0434	0.0487	0.0921	0.0238	0.0448	0.0687	0.0000	66.3164	66.3164	0.0203	0.0000	66.7431

3.2 Site Preparation - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	
Total	3.6300e-003	1.9900e-003	0.0174	3.0000e-005	2.6100e-003	2.0000e-005	2.6200e-003	6.9000e-004	2.0000e-005	7.1000e-004	0.0000	2.1645	2.1645	1.4000e-004	0.0000	2.1673	

3.3 Grading - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1077	0.0000	0.1077	0.0569	0.0000	0.0569	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1436	1.6037	1.0438	1.3600e-003		0.0775	0.0775		0.0713	0.0713	0.0000	125.8792	125.8792	0.0386	0.0000	126.6891
Total	0.1436	1.6037	1.0438	1.3600e-003	0.1077	0.0775	0.1851	0.0569	0.0713	0.1281	0.0000	125.8792	125.8792	0.0386	0.0000	126.6891

3.3 Grading - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	
Total	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Fugitive Dust					0.0485	0.0000	0.0485	0.0256	0.0000	0.0256	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.1435	1.6018	1.0425	1.3500e-003		0.0774	0.0774		0.0712	0.0712	0.0000	125.7294	125.7294	0.0385	0.0000	126.5384	
Total	0.1435	1.6018	1.0425	1.3500e-003	0.0485	0.0774	0.1258	0.0256	0.0712	0.0968	0.0000	125.7294	125.7294	0.0385	0.0000	126.5384	

3.3 Grading - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	
Total	3.8600e-003	2.1100e-003	0.0185	3.0000e-005	2.7700e-003	2.0000e-005	2.7900e-003	7.4000e-004	2.0000e-005	7.5000e-004	0.0000	2.2998	2.2998	1.5000e-004	0.0000	2.3028	

3.4 Building Construction - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.3516	2.6430	2.1007	2.9100e-003		0.1618	0.1618		0.1524	0.1524	0.0000	251.5099	251.5099	0.0683	0.0000	252.9441
Total	0.3516	2.6430	2.1007	2.9100e-003		0.1618	0.1618		0.1524	0.1524	0.0000	251.5099	251.5099	0.0683	0.0000	252.9441

3.4 Building Construction - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1006	0.2809	0.7485	8.1000e-004	0.0239	6.8300e-003	0.0307	6.7900e-003	6.2800e-003	0.0131	0.0000	72.1334	72.1334	4.2000e-004	0.0000	72.1422	
Worker	0.1633	0.0894	0.7849	1.3500e-003	0.1173	7.6000e-004	0.1180	0.0312	7.0000e-004	0.0318	0.0000	97.4010	97.4010	6.1500e-003	0.0000	97.5302	
Total	0.2640	0.3703	1.5335	2.1600e-003	0.1412	7.5900e-003	0.1488	0.0379	6.9800e-003	0.0449	0.0000	169.5344	169.5344	6.5700e-003	0.0000	169.6724	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.3511	2.6399	2.0982	2.9100e-003		0.1616	0.1616		0.1522	0.1522	0.0000	251.2107	251.2107	0.0682	0.0000	252.6432	
Total	0.3511	2.6399	2.0982	2.9100e-003		0.1616	0.1616		0.1522	0.1522	0.0000	251.2107	251.2107	0.0682	0.0000	252.6432	

3.4 Building Construction - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1006	0.2809	0.7485	8.1000e-004	0.0239	6.8300e-003	0.0307	6.7900e-003	6.2800e-003	0.0131	0.0000	72.1334	72.1334	4.2000e-004	0.0000	72.1422	
Worker	0.1633	0.0894	0.7849	1.3500e-003	0.1173	7.6000e-004	0.1180	0.0312	7.0000e-004	0.0318	0.0000	97.4010	97.4010	6.1500e-003	0.0000	97.5302	
Total	0.2640	0.3703	1.5335	2.1600e-003	0.1412	7.5900e-003	0.1488	0.0379	6.9800e-003	0.0449	0.0000	169.5344	169.5344	6.5700e-003	0.0000	169.6724	

3.4 Building Construction - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.6367	4.8991	4.1850	6.0700e-003		0.2855	0.2855		0.2692	0.2692	0.0000	517.9192	517.9192	0.1389	0.0000	520.8366	
Total	0.6367	4.8991	4.1850	6.0700e-003		0.2855	0.2855		0.2692	0.2692	0.0000	517.9192	517.9192	0.1389	0.0000	520.8366	

3.4 Building Construction - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1855	0.5248	1.4466	1.6900e-003	0.0497	0.0133	0.0630	0.0142	0.0122	0.0263	0.0000	147.6743	147.6743	8.5000e-004	0.0000	147.6922	
Worker	0.3070	0.1679	1.4532	2.8200e-003	0.2443	1.5200e-003	0.2459	0.0649	1.4100e-003	0.0663	0.0000	195.2556	195.2556	0.0118	0.0000	195.5033	
Total	0.4925	0.6927	2.8997	4.5100e-003	0.2941	0.0148	0.3089	0.0790	0.0136	0.0926	0.0000	342.9299	342.9299	0.0126	0.0000	343.1954	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.6359	4.8933	4.1800	6.0600e-003		0.2851	0.2851		0.2689	0.2689	0.0000	517.3031	517.3031	0.1388	0.0000	520.2171	
Total	0.6359	4.8933	4.1800	6.0600e-003		0.2851	0.2851		0.2689	0.2689	0.0000	517.3031	517.3031	0.1388	0.0000	520.2171	

3.4 Building Construction - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.1855	0.5248	1.4466	1.6900e-003	0.0497	0.0133	0.0630	0.0142	0.0122	0.0263	0.0000	147.6743	147.6743	8.5000e-004	0.0000	147.6922	
Worker	0.3070	0.1679	1.4532	2.8200e-003	0.2443	1.5200e-003	0.2459	0.0649	1.4100e-003	0.0663	0.0000	195.2556	195.2556	0.0118	0.0000	195.5033	
Total	0.4925	0.6927	2.8997	4.5100e-003	0.2941	0.0148	0.3089	0.0790	0.0136	0.0926	0.0000	342.9299	342.9299	0.0126	0.0000	343.1954	

3.5 Paving - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.0680	0.6081	0.4267	5.9000e-004		0.0442	0.0442		0.0408	0.0408	0.0000	52.5653	52.5653	0.0151	0.0000	52.8824	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0680	0.6081	0.4267	5.9000e-004		0.0442	0.0442		0.0408	0.0408	0.0000	52.5653	52.5653	0.0151	0.0000	52.8824	

3.5 Paving - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	
Total	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.0679	0.6074	0.4262	5.9000e-004		0.0441	0.0441		0.0407	0.0407	0.0000	52.5028	52.5028	0.0151	0.0000	52.8195	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0679	0.6074	0.4262	5.9000e-004		0.0441	0.0441		0.0407	0.0407	0.0000	52.5028	52.5028	0.0151	0.0000	52.8195	

3.5 Paving - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	
Total	0.0113	6.2000e-003	0.0545	9.0000e-005	8.1400e-003	5.0000e-005	8.2000e-003	2.1600e-003	5.0000e-005	2.2100e-003	0.0000	6.7640	6.7640	4.3000e-004	0.0000	6.7729	

3.5 Paving - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.1231	1.1253	0.8928	1.2700e-003		0.0777	0.0777		0.0718	0.0718	0.0000	111.5879	111.5879	0.0325	0.0000	112.2708	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.1231	1.1253	0.8928	1.2700e-003		0.0777	0.0777		0.0718	0.0718	0.0000	111.5879	111.5879	0.0325	0.0000	112.2708	

3.5 Paving - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361	
Total	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Off-Road	0.1230	1.1239	0.8917	1.2700e-003		0.0777	0.0777		0.0717	0.0717	0.0000	111.4552	111.4552	0.0325	0.0000	112.1373	
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.1230	1.1239	0.8917	1.2700e-003		0.0777	0.0777		0.0717	0.0717	0.0000	111.4552	111.4552	0.0325	0.0000	112.1373	

3.5 Paving - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361	
Total	0.0220	0.0121	0.1043	2.0000e-004	0.0175	1.1000e-004	0.0177	4.6600e-003	1.0000e-004	4.7600e-003	0.0000	14.0184	14.0184	8.5000e-004	0.0000	14.0361	

3.6 Architectural Coating - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Archit. Coating	0.8318						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0183	0.1202	0.1027	1.6000e-004			9.5300e-003	9.5300e-003		9.5300e-003	9.5300e-003	0.0000	14.0429	14.0429	1.4800e-003	0.0000	14.0740
Total	0.8501	0.1202	0.1027	1.6000e-004			9.5300e-003	9.5300e-003		9.5300e-003	9.5300e-003	0.0000	14.0429	14.0429	1.4800e-003	0.0000	14.0740

3.6 Architectural Coating - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	
Total	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Archit. Coating	0.8318						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0183	0.1200	0.1026	1.6000e-004		9.5200e-003	9.5200e-003		9.5200e-003	9.5200e-003	0.0000	14.0262	14.0262	1.4800e-003	0.0000	14.0573	
Total	0.8500	0.1200	0.1026	1.6000e-004		9.5200e-003	9.5200e-003		9.5200e-003	9.5200e-003	0.0000	14.0262	14.0262	1.4800e-003	0.0000	14.0573	

3.6 Architectural Coating - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	
Total	0.0149	8.1400e-003	0.0715	1.2000e-004	0.0107	7.0000e-005	0.0108	2.8400e-003	6.0000e-005	2.9000e-003	0.0000	8.8712	8.8712	5.6000e-004	0.0000	8.8830	

3.6 Architectural Coating - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Archit. Coating	3.9471						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0779	0.5235	0.4840	7.8000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.6400	66.6400	6.3300e-003	0.0000	66.7730	
Total	4.0251	0.5235	0.4840	7.8000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.6400	66.6400	6.3300e-003	0.0000	66.7730	

3.6 Architectural Coating - 2018

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	
Total	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Archit. Coating	3.9471						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0779	0.5229	0.4834	7.7000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.5608	66.5608	6.3200e-003	0.0000	66.6936	
Total	4.0250	0.5229	0.4834	7.7000e-004		0.0393	0.0393		0.0393	0.0393	0.0000	66.5608	66.5608	6.3200e-003	0.0000	66.6936	

3.6 Architectural Coating - 2018

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	
Total	0.0637	0.0348	0.3015	5.8000e-004	0.0507	3.2000e-004	0.0510	0.0135	2.9000e-004	0.0138	0.0000	40.5080	40.5080	2.4500e-003	0.0000	40.5594	

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	31.2759	37.3364	149.3770	0.3155	20.7376	0.7193	21.4569	5.5456	0.6622	6.2078	0.0000	23,348.59 10	23,348.59 10	0.8357	0.0000	23,366.14 02
Unmitigated	31.2759	37.3364	149.3770	0.3155	20.7376	0.7193	21.4569	5.5456	0.6622	6.2078	0.0000	23,348.59 10	23,348.59 10	0.8357	0.0000	23,366.14 02

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
High Turnover (Sit Down Restaurant)	745.10	928.05	745.10	6,743,120	6,743,120
Hotel	206.00	205.00	206.00	2,247,960	2,247,960
User Defined Commercial	6,482.29	9,711.11	6482.29	45,595,247	45,595,247
Total	7,433.39	10,844.16	7,433.39	54,586,327	54,586,327

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
High Turnover (Sit Down)	30.00	30.00	30.00	2.50	5.00	92.50	80	0	20
Hotel	30.00	30.00	30.00	2.50	5.00	92.50	100	0	0
User Defined Commercial	30.00	30.00	30.00	1.00	2.00	97.00	60	0	40

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.432494	0.068575	0.183624	0.160239	0.046129	0.007778	0.006784	0.077842	0.000817	0.001136	0.010310	0.000579	0.003693

5.0 Energy Detail

5.1 Fleet Mix

Historical Energy Use: N

5.1 Mitigation Measures Energy

Exceed Title 24

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	1,965.7684	1,965.7684	0.0904	0.0187	1,973.4615	
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,278.4528	2,278.4528	0.1047	0.0217	2,287.3695	
NaturalGas Mitigated	0.0908	0.8256	0.6935	4.9500e-003		0.0628	0.0628		0.0628	0.0628	0.0000	898.8124	898.8124	0.0172	0.0165	904.2824	
NaturalGas Unmitigated	0.1117	1.0158	0.8533	6.0900e-003		0.0772	0.0772		0.0772	0.0772	0.0000	1,105.8010	1,105.8010	0.0212	0.0203	1,112.5307	

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Land Use	kBTU/yr	tons/yr											MT/yr					
Hotel	9.13308e+006	0.0493	0.4477	0.3761	2.6900e-003		0.0340	0.0340		0.0340	0.0340	0.0000	487.3759	487.3759	9.3400e-003	8.9400e-003	490.3420	
User Defined Commercial	9.96264e+006	0.0537	0.4884	0.4102	2.9300e-003		0.0371	0.0371		0.0371	0.0371	0.0000	531.6444	531.6444	0.0102	9.7500e-003	534.8799	
High Turnover (Sit Down Restaurant)	1.62621e+006	8.7700e-003	0.0797	0.0670	4.8000e-004		6.0600e-003	6.0600e-003		6.0600e-003	6.0600e-003	0.0000	86.7807	86.7807	1.6600e-003	1.5900e-003	87.3088	
Total		0.1117	1.0158	0.8533	6.1000e-003		0.0772	0.0772		0.0772	0.0772	0.0000	1,105.8010	1,105.8010	0.0212	0.0203	1,112.5308	

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Land Use	kBTU/yr	tons/yr											MT/yr					
Hotel	7.02623e+006	0.0379	0.3444	0.2893	2.0700e-003		0.0262	0.0262		0.0262	0.0262	0.0000	374.9463	374.9463	7.1900e-003	6.8700e-003	377.2281	
User Defined Commercial	8.31042e+006	0.0448	0.4074	0.3422	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.4757	443.4757	8.5000e-003	8.1300e-003	446.1746	
High Turnover (Sit Down Restaurant)	1.50646e+006	8.1200e-003	0.0739	0.0620	4.4000e-004		5.6100e-003	5.6100e-003		5.6100e-003	5.6100e-003	0.0000	80.3904	80.3904	1.5400e-003	1.4700e-003	80.8797	
Total		0.0908	0.8256	0.6935	4.9500e-003		0.0628	0.0628		0.0628	0.0628	0.0000	898.8124	898.8124	0.0172	0.0165	904.2824	

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
High Turnover (Sit Down Restaurant)	307064	87.8716	4.0400e-003	8.4000e-004	88.2154
Hotel	2.9432e+006	842.2475	0.0387	8.0100e-003	845.5437
User Defined Commercial	4.7117e+006	1,348.3337	0.0620	0.0128	1,353.6104
Total		2,278.4528	0.1047	0.0217	2,287.3695

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
High Turnover (Sit Down Restaurant)	284899	81.5285	3.7500e-003	7.8000e-004	81.8476
Hotel	2.65607e+006	760.0796	0.0349	7.2300e-003	763.0542
User Defined Commercial	3.92834e+006	1,124.1603	0.0517	0.0107	1,128.5597
Total		1,965.7684	0.0904	0.0187	1,973.4615

6.0 Area Detail

6.1 Mitigation Measures Area

Use Low VOC Paint - Residential Interior

Use Low VOC Paint - Residential Exterior

Use Low VOC Paint - Non-Residential Interior

Use Low VOC Paint - Non-Residential Exterior

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr											MT/yr					
Mitigated	1.6821	2.0000e-005	2.5100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003	
Unmitigated	1.6455	2.0000e-005	2.5100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003	

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4133					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.2320					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.4000e-004	2.0000e-005	2.5100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003
Total	1.6455	2.0000e-005	2.5100e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
SubCategory	tons/yr										MT/yr						
Architectural Coating	0.4498						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Consumer Products	1.2320						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Landscaping	2.4000e-004	2.0000e-005	2.5100e-003	0.0000			1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003
Total	1.6821	2.0000e-005	2.5100e-003	0.0000			1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.8300e-003	4.8300e-003	1.0000e-005	0.0000	5.1000e-003

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	217.2202	1.6208	0.0399	263.6306
Unmitigated	217.2202	1.6211	0.0400	263.6556

7.2 Water by Land Use

Unmitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
High Turnover (Sit Down Restaurant)	1.77871 / 0.113535	7.5531	0.0583	1.4400e- 003	9.2218
Hotel	4.05868 / 0.450965	17.8448	0.1330	3.2800e- 003	21.6549
User Defined Commercial	43.6281 / 4.84856	191.8224	1.4298	0.0353	232.7789
Total		217.2202	1.6211	0.0400	263.6556

Mitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
High Turnover (Sit Down Restaurant)	1.77871 / 0.113535	7.5531	0.0583	1.4300e- 003	9.2209
Hotel	4.05868 / 0.450965	17.8448	0.1330	3.2800e- 003	21.6529
User Defined Commercial	43.6281 / 4.84856	191.8224	1.4295	0.0352	232.7568
Total		217.2202	1.6208	0.0399	263.6306

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
MT/yr				
Mitigated	557.8192	32.9662	0.0000	1,250.108 7
Unmitigated	557.8192	32.9662	0.0000	1,250.108 7

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
High Turnover (Sit Down Restaurant)	0	0.0000	0.0000	0.0000	0.0000
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	2748	557.8192	32.9662	0.0000	1,250.108 7
Total		557.8192	32.9662	0.0000	1,250.108 7

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
High Turnover (Sit Down Restaurant)	0	0.0000	0.0000	0.0000	0.0000
Hotel	0	0.0000	0.0000	0.0000	0.0000
User Defined Commercial	2748	557.8192	32.9662	0.0000	1,250.1087
Total		557.8192	32.9662	0.0000	1,250.1087

9.0 Operational Offroad

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

ATTACHMENT 2

RESPONSE TO COMMENTS

Attachment 2

RESPONSE TO COMMENTS ON THE DRAFT GENERAL CONFORMITY REVIEW AND DETERMINATION FOR THE BARSTOW CASINO-HOTEL COMPLEX PROJECT

April 2016

On February 19, 2016, Bureau of Indian Affairs (BIA) released a draft general review and conformity determination (DCD) for Alternatives A and B of the Los Coyotes Band of Cahuilla and Cupeño Indians' 23.1-acre Fee-to-Trust and Casino Hotel Project Environmental Impact Statement (EIS), initiating a 30-day public review and comment period in accordance with 40 CFR Part 51. The BIA received the following comment letter:

Comment Letter 1: Mojave Desert Air Quality Management District, February 25, 2016

The comment letter is presented immediately after the response.

Comment Letter 1 – Mojave Desert Air Quality Management District

Response to Comment

The Mojave Desert Air Quality Management District's review of and concurrence with the DCD is noted. Mitigation to minimize emissions of have been recommended within Section 5.3 of the Final EIS and include the following BMPs:

- The Tribe shall provide on-site pedestrian facility enhancements such as walkways, benches, proper lighting, and building access, which are physically separated from parking lot traffic.
- The Tribe shall provide adequate ingress and egress at entrances to the facilities to minimize vehicle idling and traffic congestion.
- Design the project site to maximize bicycle access and provide secure bicycle parking/lockers in public parking facilities. Provide locker room/showers to employees who bicycle.
- Use bicycles and/or low-emission vehicles for security patrols and other facility vehicle needs.
- Buses shall comply with the California Air Resource Board's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (California Code of Regulations, Title 13, Division 3, Article 1, Chapter 10, Section 2485) which requires that the driver of any diesel bus shall not idle for more than 5 minutes at any location, except in the case of passenger boarding where a ten minute limit is imposed, or when passengers are onboard. Furthermore the Tribe shall provide a "Drivers Lounge" for bus and truck drivers to discourage idling.
- Implement a carpool/vanpool program e.g., carpool ride matching for employees, assistance with vanpool formation, provision of vanpool vehicles, etc.

- Electric landscaping equipment shall be used for commercial and educational facilities.

In accordance with the District's recommendation, an additional measure to require an electric vehicle charging station will be added to the mitigation requirements within the BIA's Record of Decision. Because the reduction in emissions resulting from the above measures cannot be quantified, the requirements to purchase off-set credits will not change.

Summary of revisions to Conformity Determination

A summary of mitigation measures that will be implemented to reduce on-site emissions has been added to the Conformity Determination.



Comment Letter 1

Mojave Desert Air Quality Management District

14306 Park Avenue, Victorville, CA 92392-2310

760.245.1661 • fax 760.245.2699

Visit our web site: <http://www.mdaqmd.ca.gov>

Eldon Heaston, Executive Director

February 25, 2016

Amy Dutschke, Regional Director
Pacific Regional Office, Bureau of Indian Affairs
2800 Cottage Way
Sacramento, CA 95825

Reg Dir ad ✓
Dep RD Trust JK ✓
Dep RD IS _____
Route ETT
Response Required _____
Due Date _____
Memo _____ Ltr _____
Fax _____

Project Title: Draft Conformity Determination Comments, Los Coyotes Band of Cahuilla and Cupeño Indian Fee-to-Trust and Casino-Hotel Project

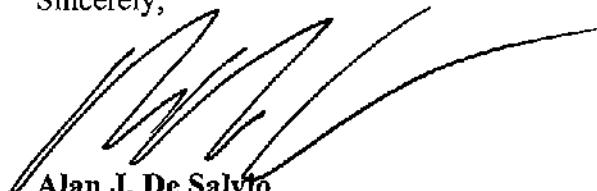
Dear Ms. Dutschke:

The Mojave Desert Air Quality Management District (District) has received the Draft Conformity Determination for the proposed Los Coyotes Band of Cahuilla and Cupeño Indian Fee-to-Trust and Casino-Hotel Project. The proposed conformity determination is for the construction and operation of a new casino/hotel facility on land located within the incorporated boundaries of the City of Barstow.

The District has reviewed the draft conformity determination and concurs with the conformity applicability and project emissions analyses (direct and indirect). The District recommends that all feasible indirect source mitigation be incorporated in the project to reduce the project impact; as the proposed project is located within the City of Barstow (and in close proximity to existing major highways), the District believes substantial indirect source mitigation and offsets may be available within the City of Barstow. The District specifically recommends the incorporation of alternative-fueled vehicles, provisions for alternative-fueled vehicles and public transportation, and infrastructure in support of alternative-fueled vehicles (such as electric vehicle charging stations). As the emissions from the project are primarily indirect mobile source emissions, the District believes that the project's indirect emissions may be consistent with the City of Barstow's General Plan and by extension therefore conforming with the District's federal ozone attainment planning State Implementation Plan elements (by definition). Finally, the District does not object to the use of stationary source new source review Emissions Reduction Credits (ERCs) to offset the proposed project, but the District would prefer that scarce stationary source ERCs be used only as a last resort.

Thank you for the opportunity to review this draft conformity document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122.

Sincerely,

A handwritten signature in black ink, appearing to read "ALAN J. DE SALVO".

Alan J. De Salvo
Deputy Director – Mojave Desert Operations

AJD/tw

Los Coyotes Casino Hotel