

DEPARTMENT OF THE INTERIOR

Bureau of Indian Affairs

DRAFT CONFORMITY DETERMINATION for the North Fork Rancheria's Proposed 305-Acre Trust Acquisition and Hotel/Casino Project, Madera County, California

AGENCY: Bureau of Indian Affairs, Interior

ACTION: Notice of Availability

SUMMARY: This notice advises the public that the Bureau of Indian Affairs (BIA), in accordance with Section 176 of the Clean Air Act 42 U.S.C. 7506, and the EPA general conformity regulations 40 CFR Part 93, Subpart B, has prepared a Draft Conformity Determination (DCD) for the North Fork Rancheria of Mono Indian's (Tribe) proposed 305-acre trust acquisition and casino-resort project in unincorporated Madera County, just north of the City of Madera, California.

DATES: The Final Conformity Determination on the proposed action will be issued no sooner than 30 days after the release of the DCD. All comments on the DCD should be received by June 6, 2011.

ADDRESSES: Mail or hand carry written comments to Amy Dutschke, Regional Director, Pacific Region, Room W2820, 2800 Cottage Way, Sacramento, California 95825. See SUPPLEMENTARY INFORMATION for directions on submitting comments and public availability of the DCD.

FOR FURTHER INFORMATION CONTACT: Pat O'Mallan, (916) 978-6044.

SUPPLEMENTARY INFORMATION: The Tribe has requested that the BIA take into trust 305 acres currently held in fee, on which the Tribe proposes to develop a hotel, casino, parking facilities, and supporting infrastructure. The Madera Site is bounded on the north by Avenue 18, rural residential land, light industrial land, and vacant land; on the east by Golden State Boulevard and SR-99; on the south by agricultural land and residential land; and on the west by Road 23 and agricultural land. The Proposed Project includes the development of an approximately 472,000 square foot hotel and casino resort and associated facilities, which include a main gaming hall, food and beverage services, retail space, banquet/meeting space, and administration space.

Project alternatives considered in the August 2010 Final Environmental Impact Statement (FEIS) included: (A) the proposed casino and hotel alternative; (B) a reduced-intensity alternative; (C) a non-gaming use alternative; (D) the North Fork Rancheria alternative site; and (E) a no action alternative. Alternative A has been selected as the Preferred Alternative, as discussed in the FEIS. The alternatives are intended to assist the review of the issues presented, but the Preferred Alternative does not necessarily reflect what the final decision will be, because a complete evaluation of the criteria listed in 25 CFR part 151 may lead to a final decision that selects an alternative other than the Preferred Alternative, including no action, or that selects a variant of the Preferred or another of the alternatives analyzed in the FEIS.

The Clean Air Act requires federal agencies to assure that their actions conform to applicable implementation plans for achieving and maintaining the National Ambient Air Quality Standards for criteria air pollutants. On May 5, 2010 the air quality designation to the San Joaquin Valley Air Basin changed from “serious” to “extreme” nonattainment for ozone, for this reason the BIA has prepared a DCD for the proposed action/project described above.

Directions for Submitting Comments

Please include your name, return address and the caption, “Draft Conformity Determination Comments, North Fork Hotel/Casino Project,” on the first page of your written comments. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

DCD Public Availability

The DCD is available on the following website: <http://www.NorthForkEIS.com>. To obtain a copy of the DCD, please provide your name and address in writing or by voicemail to Pat O’Mallan, Environmental Protection Specialist, at the address listed in the ADDRESSES section of this notice, or at the telephone number listed in the FOR FURTHER INFORMATION CONTACT section of this notice.

Public Comment Availability

Comments, including names and addresses of respondents, will be available for public review by requesting a copy at the above mailing address shown in the ADDRESSES section, during regular business hours, 8 a.m. to 4:30 p.m., Monday through Friday, except holidays.

Authority

This notice is published in accordance with Council on Environmental Quality Regulations 40 CFR 93.155, which provides reporting requirements for conformity determinations.

**DRAFT GENERAL CONFORMITY DETERMINATION
FOR THE NORTH FORK RANCHERIA CASINO/HOTEL RESORT
PROJECT**

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1.0 INTRODUCTION

An Environmental Impact Statement (EIS) was prepared to assess the environmental consequences of the Bureau of Indian Affairs (BIA) approval of a fee-to-trust application from the North Fork Rancheria of Mono Indians (Tribe). The foreseeable consequence of this federal action would be development of a casino/hotel resort on the Madera site in Madera County, California. The effects of four alternatives and a No Action alternative are analyzed within the EIS.

The Proposed Project (Alternative A) is planned for the eastern portion of the Madera site, adjacent to State Route 99. The proposed development consists of a casino/hotel resort, which would total approximately 493,010 square feet in area. The casino/hotel resort would include restaurants, a 200-room hotel, an entertainment venue, banquet/meeting space, as well as a pool and spa. The remainder of the Madera site would remain undeveloped and be used for open space, pasture, and biological habitat.

The Proposed Project is located just north of the City of Madera, adjacent to State Route 99 which is the main north/south artery in the region. The Madera site is approximately 21 miles north of Fresno. The San Joaquin Valley Air Pollution Control District (SJVAPCD) currently has local jurisdiction over the region including the Madera and North Fork sites, which are located within the San Joaquin Valley Air Basin (SJVAB).

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, 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).
- The USEPA deleted 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).
- The USEPA 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 should be addressed in two phases. The first phase is the conformity applicability 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.

Phase One

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. The four steps in the review process are shown below:

- Determine whether the proposed action causes emissions of criteria pollutants;
- Determine whether the emissions of a criteria pollutant or its precursor (i.e. NO_x and VOCs for ozone) would occur in a non-attainment or maintenance area for that pollutant;
- 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 pollutants of concern from the proposed action and compare the estimates to the de minimus threshold of 40 CFR 93.153 (b)(1) and (2) and to the non-attainment or maintenance area's emissions inventory for each criteria pollutant of concern.

Phase Two

The purpose of the conformity determination, if needed, is to show if the Proposed Project conforms to the SIP.

Conformity can be shown for NO_x and ROG (Ozone precursors) 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. Compliance 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, 40 CFR 93.158 (c).

3.0 APPLICABILITY OF PROPOSED PROJECT

EMISSIONS

The Proposed Project's emissions are evaluated in two phases, construction and operation. The two phases would not overlap. Criteria pollutants will be produced during both phases. The pollutants of concern during construction are ROG and NO_x (ozone precursors), which are products of combustion, in this case from operation of heavy equipment. Operational emissions are mainly emitted from vehicles visiting the casino/hotel resort, while air emissions from stationary source are negligible. Pollutants of concern during operation of the casino/hotel resort

are also ROG and NOx. 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 SJVAB. The SJVAB is currently designated extreme non-attainment for 8-hour ozone under the NAAQS.

EXEMPTION

The Federal action that is described in Section 1.0 would result in emissions greater than de minimus thresholds, 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 THRESHOLDS

Construction-related emissions from the Proposed Project do not exceed the de minimus levels of 10 tons per year (tpy) of ROG or NOx (refer to **Attachment 1**). Emissions from operation of the Proposed Project were estimated using the USEPA and California Air Resource Board (CARB) approved land use based Urban Emissions (URBEMIS) air model. Operational emissions for ROG and NOx exceeded the 10 tpy threshold establish under 40 CFR 93.153 (b)(1), and therefore a conformity determination is required for ROG and NOx. This is due to the Proposed Project being located in a non-attainment area for ozone, of which ROG and NOx are precursors. ROG and NOx emissions are greater than the applicable conformity thresholds shown in **Table 1**. **Section 3.4, 4.4, and 5.2.3** of the EIS provides a discussion of this issue. The URBEMIS output files are provided in **Attachment 1**.

Table 1
Pollutants of Concern Unmitigated Operational Emissions

Source	ROG	NOx
	tons per year (tpy)	
Area	0.43	0.59
Mobile	20.58	41.45
Total	21.01	42.04
<i>Applicable Conformity Thresholds</i>	<i>10</i>	<i>10</i>
Exceedance of Threshold	Yes	Yes

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

Air modeling was performed for the EIS and the general conformity determination. The results of this analysis can be found in EIS **Sections 3.4, 4.4, 5.2.3, and Appendices Volume III, Appendix W** (Available online at www.NorthForkEIS.com). As discussed above, a general conformity determination is required for NO_x and ROG. Conformity can be shown through compliance with the phase two criteria detailed in **Section 2.0**.

On April 15, 2004, the USEPA designated and classified the SJVAB as serious nonattainment for the federal 8-hour ozone standard. This designation and classification was promulgated on June 15, 2004. The USEPA had allowed SJVAPCD until June 15, 2013 to achieve a designation and classification of transitional attainment for the 8-hour ozone standard. The SJVAPCD submitted the original 8-hour ozone plan to the USEPA on June 15, 2007.

The original 8-hours plan would not enable SJVAB to achieve attainment by June 2013; therefore, on April 30, 2007 the SJVAPCD board approved an 8- hour ozone plan that would extend the attainment date from June 15, 2013 to June 15, 2024. In accordance with the April 30, 2007 plan the SJVAB must reduce NO_x by 75 percent. On May 5, 2010 the USEPA reclassified the SJVAB as extreme nonattainment for the federal 8-hour ozone standard. This designation and classification became affective on June 4, 2010. Due to the reclassification of the SJVAB to extreme nonattainment the applicable conformity thresholds for NO_x and ROG were lowered from 50 tons per year of ozone precursors (NO_x and ROG) to 10 tons per year. The SJVAPCD has not released a revised SIP that includes the reclassification status of the SJVAB. However, a conformity determination is required for this project due to the Proposed Project emissions exceeding the current conformity thresholds of 10 tpy of ROG and NO_x.

Offsets

Conformity can be achieved by fully offsetting the Proposed Project's mitigated operational emissions 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 SJVAB emissions inventory (2005) 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. Therefore, conformity will not be determined using this option.

Mitigation

Mitigation measures for the Proposed Project are outlined in **Section 5.2.3** of the EIS and will be included in the Record of Decision (ROD). In addition, modification of one of the EIS mitigation measures to require the use of a project-operated shuttle service during operation was assumed in the URBEMIS model run. The modified mitigation measure clarifies that at least six shuttle trips per day will occur. The estimated mitigated emissions are shown in **Table 2**.

Table 2
Pollutants of Concern Mitigated Operational Emissions

SOURCES	ROG	NOx
	tons per year	
Area	0.43	0.59
Mobile	20.55	41.36
Total	20.98	41.95
Applicable Conformity Threshold	10	10
<i>Exceedance of Threshold</i>	Yes	Yes

Source: AES, 2010.

The BIA will choose one mitigation measure, or a combination of the following, to demonstrate conformity:

- Agree to purchase Emissions Reduction Credits (ERC) in the amount of 42 tons of NOx and 21 tons of ROG from the BAAQMD ERC bank prior to operation of the project. In accordance with 40 CFR 93.158 (a)(2) and (a)(5)(iii) ERCs can be purchased 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 NAAQS in the area where the federal action is located. The San Francisco Bay Area Air Basin (SFBAAB) contributes to the SJVAB ozone nonattainment status through the transport of ozone precursors and has a higher classification than the SJVAB.

- Agree to purchase ERC in the amount of 42 tons of NOx and 21 tons of ROG banked within the SJVAPCD in accordance with 40 CFR 93.158 (a)(2) prior to operation of the project.
- The Tribe will enter into a Voluntary Emissions Reduction Agreement (VERA) with the SJVAPCD. The Tribe will provide funds to the SJVAPCD to be used by the SJVAPCD existing Emissions Reduction Incentive Program to fund emission reduction projects, achieving the necessary emission reductions (42 tons of NOx and 21 tons of ROG) on behalf of the Tribe prior to operation of the project.

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 SJVAB. 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.

5.0 CONCLUSION

This Draft Conformity Determination will serve as a submittal to the USEPA, CARB, SJVAPCD, and BIA per 40 CFR 93.155 (a). After the 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 purchase ERCs sufficient to offset the operational effects of the proposed project in accordance with the federally approved SIP for the SJVAPCD. Because the anticipated air quality effects are associated with operation of the casino-resort 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-resort.

The proposed casino-resort complex would generate an estimated 42 tons of NOx and 21 tons of ROG. To mitigate these effects, the Tribe will purchase ERCs. Therefore, the proposed project would conform to the applicable SIP and meet general conformity requirements.

Attachment 1
URBEMIS Output Files

Urbemis 2007 Version 9.2.4

Summary Report for Annual Emissions (Tons/Year)

File Name: C:\Documents and Settings\equinn\Application Data\Urbemis\Version9a\Projects\Northfork\ROD\Nothfork Alt. A Near-Term.urb924

Project Name: Northfork Alt. A Near-Term

Project Location: San Joaquin Valley APCD

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

CONSTRUCTION EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
2010 TOTALS (tons/year unmitigated)	1.46	5.49	4.85	0.00	2.13	0.32	2.46	0.45	0.30	0.74	716.25
2010 TOTALS (tons/year mitigated)	0.92	4.74	4.85	0.00	0.16	0.04	0.20	0.04	0.04	0.07	716.25
Percent Reduction	37.11	13.80	0.00	0.00	92.46	87.36	91.78	92.11	87.52	90.27	0.00
2011 TOTALS (tons/year unmitigated)	3.70	3.81	3.78	0.00	0.01	0.26	0.27	0.00	0.24	0.24	562.26
2011 TOTALS (tons/year mitigated)	2.91	3.30	3.78	0.00	0.01	0.04	0.05	0.00	0.03	0.04	562.26
Percent Reduction	21.26	13.35	0.00	0.00	0.00	86.18	82.78	0.00	86.35	85.00	0.00

AREA SOURCE EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (tons/year, unmitigated)	0.43	0.59	0.78	0.00	0.00	0.00	711.79
TOTALS (tons/year, mitigated)	0.43	0.59	0.78	0.00	0.00	0.00	711.79
Percent Reduction	0.00	0.00	0.00	NaN	NaN	NaN	0.00

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OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (tons/year, unmitigated)	20.58	41.45	241.12	0.22	19.66	4.65	22,942.57
TOTALS (tons/year, mitigated)	20.55	41.36	240.64	0.22	19.62	4.64	22,896.68
Percent Reduction	0.15	0.22	0.20	0.00	0.20	0.22	0.20

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (tons/year, unmitigated)	21.01	42.04	241.90	0.22	19.66	4.65	23,654.36
TOTALS (tons/year, mitigated)	20.98	41.95	241.42	0.22	19.62	4.64	23,608.47
Percent Reduction	0.14	0.21	0.20	0.00	0.20	0.22	0.19

Urbemis 2007 Version 9.2.4

Combined Summer Emissions Reports (Pounds/Day)

File Name: C:\Documents and Settings\equinn\Application Data\Urbemis\Version9a\Projects\Northfork\ROD\Northfork Alt. A Near-Term.urb924

Project Name: Northfork Alt. A Near-Term

Project Location: San Joaquin Valley APCD

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
2010 TOTALS (lbs/day unmitigated)	57.27	66.68	61.34	0.04	80.01	3.78	83.18	16.71	3.47	19.62	8,650.38
2010 TOTALS (lbs/day mitigated)	17.02	56.70	61.34	0.04	5.66	0.54	5.90	1.18	0.49	1.41	8,650.38
2011 TOTALS (lbs/day unmitigated)	59.42	71.24	69.17	0.04	0.19	4.87	5.06	0.07	4.47	4.54	10,280.05
2011 TOTALS (lbs/day mitigated)	47.23	61.74	69.17	0.04	0.19	0.67	0.86	0.07	0.61	0.67	10,280.05

AREA SOURCE EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	2.52	3.29	5.82	0.00	0.02	0.02	3,903.06
TOTALS (lbs/day, mitigated)	2.52	3.29	5.82	0.00	0.02	0.02	3,903.06
Percent Reduction	0.00	0.00	0.00	NaN	0.00	0.00	0.00

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OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	104.96	200.94	1,286.97	1.28	107.72	25.48	130,961.31
TOTALS (lbs/day, mitigated)	104.74	200.53	1,284.39	1.28	107.51	25.43	130,699.38
Percent Reduction	0.21	0.20	0.20	0.00	0.19	0.20	0.20

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	107.48	204.23	1,292.79	1.28	107.74	25.50	134,864.37
TOTALS (lbs/day, mitigated)	107.26	203.82	1,290.21	1.28	107.53	25.45	134,602.44
Percent Reduction	0.20	0.20	0.20	0.00	0.19	0.20	0.19

Construction Unmitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Summer Pounds Per Day, Unmitigated

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
Time Slice 6/1/2010-7/15/2010 Active Days: 39	7.92	<u>66.68</u>	35.62	0.00	<u>80.01</u>	3.16	<u>83.18</u>	<u>16.71</u>	2.91	<u>19.62</u>	6,265.21
Mass Grading 06/01/2010- 07/15/2010	7.92	66.68	35.62	0.00	80.01	3.16	83.18	16.71	2.91	19.62	6,265.21
Mass Grading Dust	0.00	0.00	0.00	0.00	80.00	0.00	80.00	16.71	0.00	16.71	0.00
Mass Grading Off Road Diesel	7.82	66.51	32.47	0.00	0.00	3.15	3.15	0.00	2.90	2.90	5,968.72
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.10	0.17	3.15	0.00	0.01	0.01	0.02	0.01	0.01	0.01	296.49

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Time Slice 7/16/2010-7/31/2010	5.57	46.96	25.12	0.00	80.01	2.22	82.23	16.71	2.04	18.75	4,415.65
Active Days: 14											
Fine Grading 07/16/2010-08/01/2010	5.57	46.96	25.12	0.00	80.01	2.22	82.23	16.71	2.04	18.75	4,415.65
Fine Grading Dust	0.00	0.00	0.00	0.00	80.00	0.00	80.00	16.71	0.00	16.71	0.00
Fine Grading Off Road Diesel	5.51	46.83	22.91	0.00	0.00	2.21	2.21	0.00	2.04	2.04	4,208.11
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.07	0.12	2.20	0.00	0.01	0.01	0.02	0.00	0.00	0.01	207.54
Time Slice 8/2/2010-11/30/2010	9.57	59.01	60.64	0.03	0.17	3.78	3.94	0.06	3.47	3.52	8,584.39
Active Days: 104											
Building 08/02/2010-05/15/2011	9.57	59.01	60.64	0.03	0.17	3.78	3.94	0.06	3.47	3.52	8,584.39
Building Off Road Diesel	8.32	52.40	28.32	0.00	0.00	3.50	3.50	0.00	3.22	3.22	4,990.93
Building Vendor Trips	0.39	5.08	4.36	0.01	0.04	0.20	0.23	0.01	0.18	0.19	958.30
Building Worker Trips	0.86	1.54	27.96	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,635.16
Time Slice 12/1/2010-12/31/2010	<u>57.27</u>	59.05	<u>61.34</u>	<u>0.04</u>	0.17	<u>3.78</u>	3.95	0.06	<u>3.47</u>	3.53	<u>8,650.38</u>
Active Days: 27											
Building 08/02/2010-05/15/2011	9.57	59.01	60.64	0.03	0.17	3.78	3.94	0.06	3.47	3.52	8,584.39
Building Off Road Diesel	8.32	52.40	28.32	0.00	0.00	3.50	3.50	0.00	3.22	3.22	4,990.93
Building Vendor Trips	0.39	5.08	4.36	0.01	0.04	0.20	0.23	0.01	0.18	0.19	958.30
Building Worker Trips	0.86	1.54	27.96	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,635.16
Coating 12/01/2010-05/31/2011	47.70	0.04	0.70	0.00	0.00	0.00	0.01	0.00	0.00	0.00	65.98
Architectural Coating	47.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.04	0.70	0.00	0.00	0.00	0.01	0.00	0.00	0.00	65.98

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Time Slice 1/1/2011-2/28/2011	56.56	55.22	58.10	0.04	0.17	3.56	3.73	0.06	3.27	3.33	8,651.85
Active Days: 50											
Building 08/02/2010-05/15/2011	8.87	55.18	57.45	0.03	0.17	3.56	3.72	0.06	3.27	3.33	8,585.83
Building Off Road Diesel	7.72	49.20	27.76	0.00	0.00	3.31	3.31	0.00	3.04	3.04	4,990.93
Building Vendor Trips	0.37	4.60	4.05	0.01	0.04	0.18	0.22	0.01	0.16	0.18	958.53
Building Worker Trips	0.78	1.38	25.65	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,636.36
Coating 12/01/2010-05/31/2011	47.69	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Architectural Coating	47.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Time Slice 3/1/2011-5/14/2011	59.42	71.24	69.17	0.04	0.19	4.87	5.06	0.07	4.47	4.54	10,280.05
Active Days: 65											
Asphalt 03/01/2011-05/31/2011	2.86	16.03	11.07	0.00	0.02	1.31	1.33	0.01	1.20	1.21	1,628.21
Paving Off-Gas	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.34	14.17	8.17	0.00	0.00	1.24	1.24	0.00	1.14	1.14	1,131.92
Paving On Road Diesel	0.12	1.73	0.59	0.00	0.01	0.07	0.07	0.00	0.06	0.06	258.99
Paving Worker Trips	0.07	0.12	2.31	0.00	0.01	0.01	0.02	0.00	0.01	0.01	237.30
Building 08/02/2010-05/15/2011	8.87	55.18	57.45	0.03	0.17	3.56	3.72	0.06	3.27	3.33	8,585.83
Building Off Road Diesel	7.72	49.20	27.76	0.00	0.00	3.31	3.31	0.00	3.04	3.04	4,990.93
Building Vendor Trips	0.37	4.60	4.05	0.01	0.04	0.18	0.22	0.01	0.16	0.18	958.53
Building Worker Trips	0.78	1.38	25.65	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,636.36
Coating 12/01/2010-05/31/2011	47.69	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Architectural Coating	47.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01

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Time Slice 5/16/2011-5/31/2011	50.56	16.06	11.71	0.01	0.02	1.31	1.33	0.01	1.20	1.21	1,694.22
Active Days: 14											
Asphalt 03/01/2011-05/31/2011	2.86	16.03	11.07	0.00	0.02	1.31	1.33	0.01	1.20	1.21	1,628.21
Paving Off-Gas	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.34	14.17	8.17	0.00	0.00	1.24	1.24	0.00	1.14	1.14	1,131.92
Paving On Road Diesel	0.12	1.73	0.59	0.00	0.01	0.07	0.07	0.00	0.06	0.06	258.99
Paving Worker Trips	0.07	0.12	2.31	0.00	0.01	0.01	0.02	0.00	0.01	0.01	237.30
Coating 12/01/2010-05/31/2011	47.69	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Architectural Coating	47.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01

Phase Assumptions

Phase: Fine Grading 7/16/2010 - 8/1/2010 - Default Fine Site Grading Description

Total Acres Disturbed: 44

Maximum Daily Acreage Disturbed: 4

Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

2 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day

2 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day

1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day

2 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Mass Grading 6/1/2010 - 7/15/2010 - Type Your Description Here

Total Acres Disturbed: 44

Maximum Daily Acreage Disturbed: 4

Fugitive Dust Level of Detail: Default

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20 lbs per acre-day

On Road Truck Travel (VMT): 0

Off-Road Equipment:

- 2 Graders (174 hp) operating at a 0.61 load factor for 6 hours per day
- 3 Rubber Tired Dozers (357 hp) operating at a 0.59 load factor for 6 hours per day
- 2 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 7 hours per day
- 3 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Paving 3/1/2011 - 5/31/2011 - Default Paving Description

Acres to be Paved: 10

Off-Road Equipment:

- 4 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 6 hours per day
- 1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day
- 2 Paving Equipment (104 hp) operating at a 0.53 load factor for 6 hours per day
- 1 Rollers (95 hp) operating at a 0.56 load factor for 7 hours per day

Phase: Building Construction 8/2/2010 - 5/15/2011 - Default Building Construction Description

Off-Road Equipment:

- 2 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 8 hours per day
- 4 Concrete/Industrial Saws (10 hp) operating at a 0.73 load factor for 8 hours per day
- 1 Cranes (399 hp) operating at a 0.43 load factor for 6 hours per day
- 1 Generator Sets (49 hp) operating at a 0.74 load factor for 8 hours per day
- 4 Rough Terrain Forklifts (93 hp) operating at a 0.6 load factor for 8 hours per day
- 2 Rubber Tired Loaders (164 hp) operating at a 0.54 load factor for 8 hours per day
- 1 Tractors/Loaders/Backhoes (108 hp) operating at a 0.55 load factor for 8 hours per day
- 2 Welders (45 hp) operating at a 0.45 load factor for 8 hours per day
- 2 Water Trucks (189 hp) operating at a 0.5 load factor for 8 hours per day

Phase: Architectural Coating 12/1/2010 - 5/31/2011 - Default Architectural Coating Description

Rule: Residential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 130

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Rule: Residential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 130

Rule: Nonresidential Interior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Rule: Nonresidential Exterior Coatings begins 1/1/2005 ends 12/31/2040 specifies a VOC of 250

Construction Mitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Summer Pounds Per Day, Mitigated

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
Time Slice 6/1/2010-7/15/2010 Active Days: 39	7.92	<u>56.70</u>	35.62	0.00	<u>5.66</u>	0.24	<u>5.90</u>	<u>1.18</u>	0.22	<u>1.41</u>	6,265.21
Mass Grading 06/01/2010- 07/15/2010	7.92	56.70	35.62	0.00	5.66	0.24	5.90	1.18	0.22	1.41	6,265.21
Mass Grading Dust	0.00	0.00	0.00	0.00	5.64	0.00	5.64	1.18	0.00	1.18	0.00
Mass Grading Off Road Diesel	7.82	56.53	32.47	0.00	0.00	0.24	0.24	0.00	0.22	0.22	5,968.72
Mass Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mass Grading Worker Trips	0.10	0.17	3.15	0.00	0.01	0.01	0.02	0.01	0.01	0.01	296.49
Time Slice 7/16/2010-7/31/2010 Active Days: 14	5.57	39.93	25.12	0.00	5.65	0.17	5.83	1.18	0.16	1.34	4,415.65
Fine Grading 07/16/2010- 08/01/2010	5.57	39.93	25.12	0.00	5.65	0.17	5.83	1.18	0.16	1.34	4,415.65
Fine Grading Dust	0.00	0.00	0.00	0.00	5.64	0.00	5.64	1.18	0.00	1.18	0.00
Fine Grading Off Road Diesel	5.51	39.81	22.91	0.00	0.00	0.17	0.17	0.00	0.15	0.15	4,208.11
Fine Grading On Road Diesel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fine Grading Worker Trips	0.07	0.12	2.20	0.00	0.01	0.01	0.02	0.00	0.00	0.01	207.54

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Time Slice 8/2/2010-11/30/2010	9.57	51.15	60.64	0.03	0.17	0.53	0.70	0.06	0.48	0.54	8,584.39
Active Days: 104											
Building 08/02/2010-05/15/2011	9.57	51.15	60.64	0.03	0.17	0.53	0.70	0.06	0.48	0.54	8,584.39
Building Off Road Diesel	8.32	44.54	28.32	0.00	0.00	0.26	0.26	0.00	0.24	0.24	4,990.93
Building Vendor Trips	0.39	5.08	4.36	0.01	0.04	0.20	0.23	0.01	0.18	0.19	958.30
Building Worker Trips	0.86	1.54	27.96	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,635.16
Time Slice 12/1/2010-12/31/2010	<u>17.02</u>	51.19	<u>61.34</u>	<u>0.04</u>	0.17	<u>0.54</u>	0.70	0.06	<u>0.49</u>	0.55	<u>8,650.38</u>
Active Days: 27											
Building 08/02/2010-05/15/2011	9.57	51.15	60.64	0.03	0.17	0.53	0.70	0.06	0.48	0.54	8,584.39
Building Off Road Diesel	8.32	44.54	28.32	0.00	0.00	0.26	0.26	0.00	0.24	0.24	4,990.93
Building Vendor Trips	0.39	5.08	4.36	0.01	0.04	0.20	0.23	0.01	0.18	0.19	958.30
Building Worker Trips	0.86	1.54	27.96	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,635.16
Coating 12/01/2010-05/31/2011	7.45	0.04	0.70	0.00	0.00	0.00	0.01	0.00	0.00	0.00	65.98
Architectural Coating	7.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.04	0.70	0.00	0.00	0.00	0.01	0.00	0.00	0.00	65.98
Time Slice 1/1/2011-2/28/2011	44.37	47.84	58.10	0.04	0.17	0.50	0.67	0.06	0.45	0.51	8,651.85
Active Days: 50											
Building 08/02/2010-05/15/2011	8.87	47.80	57.45	0.03	0.17	0.50	0.67	0.06	0.45	0.51	8,585.83
Building Off Road Diesel	7.72	41.82	27.76	0.00	0.00	0.25	0.25	0.00	0.23	0.23	4,990.93
Building Vendor Trips	0.37	4.60	4.05	0.01	0.04	0.18	0.22	0.01	0.16	0.18	958.53
Building Worker Trips	0.78	1.38	25.65	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,636.36
Coating 12/01/2010-05/31/2011	35.50	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Architectural Coating	35.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01

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Time Slice 3/1/2011-5/14/2011	<u>47.23</u>	<u>61.74</u>	<u>69.17</u>	<u>0.04</u>	<u>0.19</u>	<u>0.67</u>	<u>0.86</u>	<u>0.07</u>	<u>0.61</u>	<u>0.67</u>	<u>10,280.05</u>
Active Days: 65											
Asphalt 03/01/2011-05/31/2011	2.86	13.90	11.07	0.00	0.02	0.16	0.19	0.01	0.15	0.16	1,628.21
Paving Off-Gas	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.34	12.04	8.17	0.00	0.00	0.09	0.09	0.00	0.09	0.09	1,131.92
Paving On Road Diesel	0.12	1.73	0.59	0.00	0.01	0.07	0.07	0.00	0.06	0.06	258.99
Paving Worker Trips	0.07	0.12	2.31	0.00	0.01	0.01	0.02	0.00	0.01	0.01	237.30
Building 08/02/2010-05/15/2011	8.87	47.80	57.45	0.03	0.17	0.50	0.67	0.06	0.45	0.51	8,585.83
Building Off Road Diesel	7.72	41.82	27.76	0.00	0.00	0.25	0.25	0.00	0.23	0.23	4,990.93
Building Vendor Trips	0.37	4.60	4.05	0.01	0.04	0.18	0.22	0.01	0.16	0.18	958.53
Building Worker Trips	0.78	1.38	25.65	0.03	0.13	0.07	0.20	0.05	0.06	0.11	2,636.36
Coating 12/01/2010-05/31/2011	35.50	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Architectural Coating	35.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Time Slice 5/16/2011-5/31/2011	38.36	13.94	11.71	0.01	0.02	0.17	0.19	0.01	0.15	0.16	1,694.22
Active Days: 14											
Asphalt 03/01/2011-05/31/2011	2.86	13.90	11.07	0.00	0.02	0.16	0.19	0.01	0.15	0.16	1,628.21
Paving Off-Gas	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	2.34	12.04	8.17	0.00	0.00	0.09	0.09	0.00	0.09	0.09	1,131.92
Paving On Road Diesel	0.12	1.73	0.59	0.00	0.01	0.07	0.07	0.00	0.06	0.06	258.99
Paving Worker Trips	0.07	0.12	2.31	0.00	0.01	0.01	0.02	0.00	0.01	0.01	237.30
Coating 12/01/2010-05/31/2011	35.50	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01
Architectural Coating	35.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Coating Worker Trips	0.02	0.03	0.64	0.00	0.00	0.00	0.01	0.00	0.00	0.00	66.01

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Fine Grading 7/16/2010 - 8/1/2010 - Default Fine Site Grading Description

For Soil Stabilizing Measures, the Apply soil stabilizers to inactive areas mitigation reduces emissions by:

PM10: 84% PM25: 84%

For Soil Stabilizing Measures, the Water exposed surfaces 2x daily watering mitigation reduces emissions by:

PM10: 55% PM25: 55%

For Soil Stabilizing Measures, the Equipment loading/unloading mitigation reduces emissions by:

PM10: 69% PM25: 69%

For Unpaved Roads Measures, the Reduce speed on unpaved roads to less than 15 mph mitigation reduces emissions by:

PM10: 44% PM25: 44%

For Unpaved Roads Measures, the Manage haul road dust 2x daily watering mitigation reduces emissions by:

PM10: 55% PM25: 55%

For Graders, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Graders, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Rubber Tired Dozers, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Rubber Tired Dozers, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Tractors/Loaders/Backhoes, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Tractors/Loaders/Backhoes, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Water Trucks, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Water Trucks, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

The following mitigation measures apply to Phase: Mass Grading 6/1/2010 - 7/15/2010 - Type Your Description Here

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For Soil Stabilizing Measures, the Apply soil stabilizers to inactive areas mitigation reduces emissions by:

PM10: 84% PM25: 84%

For Soil Stabilizing Measures, the Water exposed surfaces 2x daily watering mitigation reduces emissions by:

PM10: 55% PM25: 55%

For Soil Stabilizing Measures, the Equipment loading/unloading mitigation reduces emissions by:

PM10: 69% PM25: 69%

For Unpaved Roads Measures, the Reduce speed on unpaved roads to less than 15 mph mitigation reduces emissions by:

PM10: 44% PM25: 44%

For Unpaved Roads Measures, the Manage haul road dust 2x daily watering mitigation reduces emissions by:

PM10: 55% PM25: 55%

For Graders, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Graders, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Rubber Tired Dozers, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Rubber Tired Dozers, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Tractors/Loaders/Backhoes, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Tractors/Loaders/Backhoes, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Water Trucks, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Water Trucks, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

The following mitigation measures apply to Phase: Paving 3/1/2011 - 5/31/2011 - Default Paving Description

For Cement and Mortar Mixers, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Cement and Mortar Mixers, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

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PM10: 85% PM25: 85%

For Pavers, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Pavers, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Paving Equipment, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Paving Equipment, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Rollers, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Rollers, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

The following mitigation measures apply to Phase: Building Construction 8/2/2010 - 5/15/2011 - Default Building Construction Description

For Cranes, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Cranes, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Generator Sets, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Generator Sets, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Tractors/Loaders/Backhoes, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Tractors/Loaders/Backhoes, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Welders, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Welders, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

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For Water Trucks, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Water Trucks, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Concrete/Industrial Saws, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Concrete/Industrial Saws, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Rough Terrain Forklifts, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Rough Terrain Forklifts, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Rubber Tired Loaders, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Rubber Tired Loaders, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

For Cement and Mortar Mixers, the Use Aqueous Diesel Fuel mitigation reduces emissions by:

NOX: 15% PM10: 50% PM25: 50%

For Cement and Mortar Mixers, the Diesel Particulate Filter (DPF) 1st Tier mitigation reduces emissions by:

PM10: 85% PM25: 85%

The following mitigation measures apply to Phase: Architectural Coating 12/1/2010 - 5/31/2011 - Default Architectural Coating Description

For Nonresidential Architectural Coating Measures, the Nonresidential Exterior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

For Nonresidential Architectural Coating Measures, the Nonresidential Interior: Use Low VOC Coatings mitigation reduces emissions by:

ROG: 10%

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Area Source Unmitigated Detail Report:

AREA SOURCE EMISSION ESTIMATES Summer Pounds Per Day, Unmitigated

<u>Source</u>	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
Natural Gas	0.24	3.25	2.73	0.00	0.01	0.01	3,897.44
Hearth - No Summer Emissions							
Landscape	0.25	0.04	3.09	0.00	0.01	0.01	5.62
Consumer Products	0.00						
Architectural Coatings	2.03						
TOTALS (lbs/day, unmitigated)	2.52	3.29	5.82	0.00	0.02	0.02	3,903.06

Area Source Mitigated Detail Report:

AREA SOURCE EMISSION ESTIMATES Summer Pounds Per Day, Mitigated

<u>Source</u>	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
Natural Gas	0.24	3.25	2.73	0.00	0.01	0.01	3,897.44
Hearth - No Summer Emissions							
Landscape	0.25	0.04	3.09	0.00	0.01	0.01	5.62
Consumer Products	0.00						
Architectural Coatings	2.03						
TOTALS (lbs/day, mitigated)	2.52	3.29	5.82	0.00	0.02	0.02	3,903.06

Area Source Mitigation Measures Selected

Mitigation Description

Percent Reduction

Area Source Changes to Defaults

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Operational Unmitigated Detail Report:

OPERATIONAL EMISSION ESTIMATES Summer Pounds Per Day, Unmitigated

<u>Source</u>	ROG	NOX	CO	SO2	PM10	PM25	CO2
Hotel	7.27	10.55	67.76	0.07	5.66	1.34	6,879.89
Casino	97.69	190.39	1,219.21	1.21	102.06	24.14	124,081.42
TOTALS (lbs/day, unmitigated)	104.96	200.94	1,286.97	1.28	107.72	25.48	130,961.31

Operational Mitigated Detail Report:

OPERATIONAL EMISSION ESTIMATES Summer Pounds Per Day, Mitigated

Source	ROG	NOX	CO	SO2	PM10	PM25	CO2
Hotel	7.25	10.53	67.62	0.07	5.65	1.34	6,866.13
Casino	97.49	190.00	1,216.77	1.21	101.86	24.09	123,833.25
TOTALS (lbs/day, mitigated)	104.74	200.53	1,284.39	1.28	107.51	25.43	130,699.38

Operational Mitigation Options Selected

Residential Mitigation Measures

Nonresidential Mitigation Measures

Non-Residential Local-Serving Retail Mitigation

Percent Reduction in Trips is 0%

Inputs Selected:

The Presence of Local-Serving Retail checkbox was NOT selected.

Non-Residential Transit Service Mitigation

Percent Reduction in Trips is 0.2%

Inputs Selected:

The Number of Daily Weekday Buses Stopping Within 1/4 Mile of Site is 0

The Number of Daily Rail or Bus Rapid Transit Stops Within 1/2 Mile of Site is 0

The Number of Dedicated Daily Shuttle Trips is 6

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Operational Settings:

Includes correction for passby trips

Does not include double counting adjustment for internal trips

Analysis Year: 2012 Temperature (F): 85 Season: Summer

Emfac: Version : Emfac2007 V2.3 Nov 1 2006

Summary of Land Uses

Land Use Type	Acreage	Trip Rate	Unit Type	No. Units	Total Trips	Total VMT
Hotel		3.00	rooms	200.00	600.00	6,437.34
Casino		43.80	1000 sq ft	247.18	10,826.48	116,156.26
					11,426.48	122,593.60

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
Light Auto	42.5	0.9	98.9	0.2
Light Truck < 3750 lbs	12.1	2.5	91.7	5.8
Light Truck 3751-5750 lbs	21.1	0.9	98.6	0.5
Med Truck 5751-8500 lbs	11.9	0.8	99.2	0.0
Lite-Heavy Truck 8501-10,000 lbs	2.4	0.0	75.0	25.0
Lite-Heavy Truck 10,001-14,000 lbs	0.9	0.0	44.4	55.6
Med-Heavy Truck 14,001-33,000 lbs	1.3	0.0	15.4	84.6
Heavy-Heavy Truck 33,001-60,000 lbs	2.7	0.0	0.0	100.0
Other Bus	0.1	0.0	0.0	100.0
Urban Bus	0.0	0.0	0.0	100.0
Motorcycle	3.9	59.0	41.0	0.0

Vehicle Fleet Mix

Vehicle Type	Percent Type	Non-Catalyst	Catalyst	Diesel
School Bus	0.1	0.0	0.0	100.0
Motor Home	1.0	0.0	90.0	10.0

Travel Conditions

	Residential			Commute	Commercial	
	Home-Work	Home-Shop	Home-Other		Non-Work	Customer
Urban Trip Length (miles)	12.6	12.6	12.6	12.6	12.6	12.6
Rural Trip Length (miles)	12.6	12.6	12.6	12.6	12.6	12.6
Trip speeds (mph)	35.0	35.0	35.0	35.0	35.0	35.0
% of Trips - Residential	32.9	18.0	49.1			

% of Trips - Commercial (by land use)

Hotel	5.0	2.5	92.5
Casino	2.0	1.0	97.0

Operational Changes to Defaults

- The urban/rural selection has been changed from Urban to Rural
- Home-based work urban trip length changed from 10.8 miles to 12.6 miles
- Home-based work rural trip length changed from 16.8 miles to 12.6 miles
- Home-based shop urban trip length changed from 7.3 miles to 12.6 miles
- Home-based shop rural trip length changed from 7.1 miles to 12.6 miles
- Home-based other urban trip length changed from 7.5 miles to 12.6 miles
- Home-based other rural trip length changed from 7.9 miles to 12.6 miles

Operational Changes to Defaults

Commercial-based commute urban trip length changed from 9.5 miles to 12.6 miles

Commercial-based commute rural trip length changed from 14.7 miles to 12.6 miles

Commercial-based non-work urban trip length changed from 7.35 miles to 12.6 miles

Commercial-based non-work rural trip length changed from 6.6 miles to 12.6 miles

Commercial-based customer urban trip length changed from 7.35 miles to 12.6 miles

Commercial-based customer rural trip length changed from 6.6 miles to 12.6 miles