

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
WEB: WWW.COASTAL.CA.GOV



W15a

LCP-3-MCO-24-0039-1 (VACATION RENTALS)

AUGUST 13, 2025 HEARING

CORRESPONDENCE

From: [Dianne Yeakel](#)
To: [Butler, Katie@Coastal](#); [Kahn, Kevin@Coastal](#)
Cc: [Shaun Murphy](#)
Subject: Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1 (Vacation Rentals)
Date: Thursday, June 12, 2025 4:33:15 PM
Attachments: [2025.6.12.Coastal Commission RE LCPA.pdf](#)

Dear Ms. Butler and Mr. Kahn,

Attached please find correspondence sent to the Coastal Commission from Shaun Murphy.

Respectfully,



PALM SPRINGS INDIAN WELLS ORANGE COUNTY SAN DIEGO NEW JERSEY NEW YORK

Dianne Yeakel

Legal Assistant to Shaun Murphy

SLOVAK BARON EMPEY MURPHY & PINKNEY LLP

74774 Highway 111

Indian Wells, CA 92210

Phone (760) 322-2275

yeakel@sbemp.com

*****Confidentiality Notice*****

This e-mail message, together with any documents, files and/or other messages attached to it, is for the sole use of the intended recipients and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.



SHAUN M. MURPHY, Esq.
PARTNER
ADMITTED IN CA, MI, TX, NY
AND THE U.S. SUPREME COURT

REPLY TO:
74774 HWY 111
INDIAN WELLS, CALIFORNIA 92210
T (760) 322-2275
MURPHY@SBEMP.COM

f

June 12, 2025

VIA NEXT DAY DELIVERY

California Coastal Commission
Central Coast District
725 Front Street, Suite 300
Santa Cruz, CA 95060

**RE: Monterey County LCP Amendment No. LCP-3-MCO-24-0039-1
(Vacation Rentals)**

Dear Commissioners:

We represent the Monterey County Vacation Rental Alliance (“**MCVRA**”), which is a diverse coalition of middle-class homeowners, property managers, and small business owners throughout Monterey County who share the Coastal Commission's commitment to protecting public access to California's coast for all. MCVRA's members are vacation rental owners and operators of all ages and economic levels who form the backbone of Monterey County's visitor economy. They share a love of the California coast and want others to experience the beauty of the coast. Their short-term rentals (“**STRs**”) provide critical, affordable access to California's coast for families and travelers from all income levels. Many owners depend on coastal visitors for their economic survival.

MCVRA opposes the proposed Local Coastal Program amendment (“**LCPA**”) as drafted, which does much more than severely restrict STRs in the County's unincorporated coastal areas. It would:

1. Eliminate the primary source of affordable coastal accommodations.
2. Force visitors into environmentally harmful patterns by displacing them from existing housing to more distant locations and new hotel construction.
3. Fail to solve the County's housing challenges while also failing to address the County's actual obligations to build new affordable housing.

SLOVAK BARON EMPEY MURPHY & PINKNEY LLP

Palm Springs, CA

T (760) 322-2275

Indian Wells, CA

T (760) 322- 9240

Costa Mesa, CA

T (714) 435-9592

San Diego, CA

T (619) 501-4540

Princeton, NJ

T (609) 955-3393

New York, NY

T (212) 829-4399

www.sbemp.com

The LCPA presents a stark irony: an amendment ostensibly presented to protect communities, and housing, will instead destroy the very accommodations that make coastal access possible for working families, while doing nothing to create the affordable housing the County desperately needs.

As a reminder, the Legislature created the California Coastal Commission to preserve and maximize access to the California coastline. The California Coastal Act states: “The Legislature further finds and declares the basic goals of the state for the coastal zone are to: [m]aximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners.” (Public Resources Code § 30001.5(c).) “The Commission is charged with implementing the Coastal Act’s provisions and ‘is in many respects the heart of the Coastal Act.’” (*Kracke v. City of Santa Barbara* (2021) 63 Cal.App.5th 1089, 1095, quoting *Fudge v. City of Laguna Beach* (2019) 32 Cal.App.5th 195, 201.) As the 2nd District Court of Appeal in *Kracke* noted, Santa Barbara’s regulatory reduction of 114 STRs to 6 was inconsistent with the Coastal Act’s goal of “improving the availability of lower cost accommodations along the coast, particularly for low-income and middle-income families.” (*Kracke*, 63 Cal.App.5th at p. 1097; see also Public Resources Code § 31411, subd. (e).) In many respects, Monterey County’s LCPA will have a far more significant on a larger geographic scale than the city of Santa Barbara’s STR ban in *Kracke* because it sweeps within its scope thousands of STRs that have been and will continue to be indispensable to meet the demand for visitor overnight accommodations on the Central Coast.

By adopting this LCP amendment, the County is effectively prohibiting STRs along the entire coastline of unincorporated Monterey County. The coastline in the unincorporated area of Monterey County is approximately 100 miles. The LCPA prohibits unhosted rentals in Big Sur and Carmel Highlands. The LCP amendment will eliminate coastal STRs on private roads in areas including the entire Del Monte Forest/Pebble Beach area. By prohibiting unhosted rentals in these areas, the LCP will eradicate unhosted STRs from all but 6 miles of the coastline. Unhosted STRs would be allowed in a narrow band of coastline just south of Carmel-by-the-Sea (5 miles), and Monterey Dunes Colony (1 mile). A ban on all unhosted rentals from all but 6 miles of the coastline would severely restrict coastal access and contradict the legislative objective to maximize public recreational opportunities in the coastal zone. Rather than maximizing access, the LCP amendment is consistent with a policy to **minimize** public recreational opportunities in the coastal zone.

The Commission faces a choice between supporting an approach that reduces coastal access in the name of housing or demanding real solutions that advance both coastal access and meaningful housing production. The only possible action in concordance with the Coastal Commission's stated mandate – to “maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone” (Public Resources Code § 30001.5(c)) – is to revise the LCPA as requested below in Section D.

A. The LCPA would eliminate the County’s primary source of affordable coastal accommodations, contravening the Coastal Commission’s legislative mandate.

It must be emphasized that the California Legislature made an express declaration codifying the notion that affordable coastal accommodations are not a luxury — they are “essential elements of coastal and park access” that “enable Californians and visitors from a variety of backgrounds, including those of low and moderate income, to enjoy California’s beaches.” (Public Resources Code § 31411(c).) The Legislature further recognized that “a lack of affordable accommodations remains a barrier to coastal access” and that “California’s historic supply of lower cost coastal accommodations has been reduced and continues to be diminished.” (*Id.* § 31411(d).) In response, the Legislature directed that “California should invest in new strategies and partnerships to improve the availability of lower cost accommodations along the coast, particularly for low-income and middle-income families.” (*Id.* § 31411(e).)

Against this backdrop, Monterey County's LCPA moves in precisely the wrong direction. Rather than protecting and expanding affordable coastal accommodations, it would eliminate the primary source of currently existing accommodations.

Data shows that STRs have become the backbone of coastal access in Monterey County. STRs provide 80 percent of the total overnight visitor capacity in coastal areas of Monterey County, while hotels provide only 20 percent. (*Final Report: Monterey County Overnight Accommodation Market Analysis*, Ceto Consulting, LLC, June 2, 2025 at 2 (“**Ceto Report**”).¹ The Commission is considering a sweeping policy change that would immediately diminish coastal access for a plurality of overnight visitors to the Monterey County coast and eliminate a dominant form of accommodation that makes coastal access possible for millions of annual visitors.

The scale of this contribution is unambiguous. STRs in Monterey County provide 18,057 total rooms with a total nightly visitor capacity of 43,502 people, compared to hotels which provide 8,809 rooms with a total nightly visitor capacity of 22,903 people. (Ceto Report at 2.) STRs have organically provided more than twice the room count of the entire hotel sector combined, filling a critical gap in the accommodation market. Furthermore, the affordability advantage to STRs as compared to hotels is dramatic. On a per-person basis, STRs are significantly more affordable than hotels, averaging \$75 per person per night compared to \$122 for hotels for a 39% cost savings. For many working families, those savings make the difference between coastal access being possible or impossible. (Ceto Report at 2.)

This affordability advantage begins with the often-higher guest capacity and family-friendly accommodation of an STR. It is further enhanced by practical amenities that drastically reduce the total cost of coastal travel for middle-class California families. For

¹ The Ceto Report is provided in Attachment A to this letter.

example, most STRs include full kitchens, allowing families to prepare meals rather than rely exclusively on restaurant dining. (Ceto Report at 2.) Using the U.S. General Services Administration meals and incidental expenses rate for this area, the Ceto Report quantified the cost savings of being able to cook at an STR versus having to eat out while at a hotel at an average of \$212 to \$267 for a family of four per day. Without these cost savings, a coastal vacation is financially impossible for working families. (Ceto Report at 40.) These costs are likely to be even higher in the very expensive locales of Carmel Highlands and Big Sur. (Ceto Report at 40.)

Daily cost savings such as these are transformative when viewed across an entire trip. A family of four planning a July 2025 trip to Big Sur would face dining costs of \$424 to \$534 over just two days if staying in a hotel, while an STR would allow a family to significantly reduce those dining costs. (Ceto Report at 41.) These savings are not marginal, instead often representing the difference between coastal access being financially feasible or impossible for a middle-class family. When combined with the lower per-person accommodation costs, STRs reduce a family's total coastal vacation expenses dramatically compared to hotel stays.

The visitors served by affordable STRs are also representative of California's demographic diversity. Visitors to coastal Monterey County closely mirror the state's demographic and income profile, with roughly half of all visitors falling below the state median household income (\$67,521 in 2020), underscoring the need for affordable overnight options. (Ceto Report at 2.) In this way STRs are essential infrastructure for middle-class and low-income visitors to have coastal access and broad accessibility would be lost under the LCPA.

The Ceto Report also uses the California Coastal Conservancy's definition of Lower-Cost Coastal Accommodations ("**LCCAs**")—lodging priced at 75% or less of the statewide average daily rate for standard double-occupancy hotel and motel rooms during peak summer months (July and August) and located within the coastal zone or within one mile of the coast—to reveal the LCPA's devastating impact on affordable access. Forty-one percent of STRs located within the coastal area meet the LCCA threshold on a per-person basis. (Ceto Report at 36.) In contrast, hotels average \$132 per guest per night—well above the \$56 LCCA threshold—making STRs the primary source of affordable coastal accommodations in the County. (Ceto Report at 31.) Additionally, the burden of the LCPA would predominantly fall upon unhosted STRs, which account for 87% of STR guest capacity. (Ceto Report at 30.)

The analysis in the Ceto Report also reveals persistent excess visitor demand for coastal lodging that STRs help meet. The Report finds that there is an excess demand of 31,880 annual visitors, or over 12,000 hotel rooms countywide. (Ceto Report at 24-25.) In specific areas, the shortfall is even more significant, for example, in Big Sur, an area with only seven hotels along the entire coastline. (Ceto Report at 40.) For lower-income visitors specifically, the gap between demand and supply is enormous. There is an estimated annual excess demand of 596,156 lower-income visitors who cannot be accommodated by existing affordable hotel supply. (Ceto Report at 40.) Again in Big Sur,

the excess demand for lower-income visitors is 271,383 annually. STRs are therefore crucial to meet this excess visitor demand for coastal lodging, demonstrating that STRs are not a luxury but a necessity to maintain coastal access equity. (Ceto Report at 41.)

The Commission need not rely solely on economic analysis to recognize that eliminating the primary source of affordable Big Sur accommodations would fundamentally transform coastal access from a public right to a privilege of wealth. The LCPA would effectively reserve one of California's most iconic coastal destinations for only those who can afford luxury hotel rates, directly contradicting the Coastal Act's foundational commitment to equitable access for all.

The hotel market cannot and will not replace the accommodations lost through STR restrictions. Since 2019, Monterey County has lost 6% of its economy hotel rooms while gaining significant capacity in more expensive segments. (Ceto Report at 3.) Data shows a clear disparity: 44% of hotel rooms in this area fall into the “Luxury” or “Upper Upscale” categories, while only 29% are classified as “Economy.” (Ceto Report at 25.) The elimination of STRs would accelerate this trend by removing affordable options and concentrating all visitor demand into an increasingly expensive hotel sector—one that would not serve middle- and lower-income Californians.

The evidence is clear: STRs comprise most of the coastal accommodation capacity, serve California's diverse population at affordable rates, and fill critical gaps in the accommodation market that hotels cannot and will not serve. The LCPA would eliminate this essential infrastructure for coastal access, directly contradicting the Legislature's mandate to maximize public access and protect lower-cost visitor accommodations. The Commission thus must reject the LCPA as drafted as fundamentally inconsistent with the Coastal Act's core purposes.

B. The LCPA would force visitors into environmentally harmful patterns by displacing them from existing housing to more distant locations and new hotels which would need to be constructed to meet visitor demand.

The LCPA would create significant environmental harm by forcing visitors away from existing residential accommodations into two environmentally damaging alternatives: hotels that require substantially more resources per guest, or more distant STRs that dramatically increase vehicle miles traveled (“**VMT**”) and associated emissions. This displacement would also stimulate new hotel construction in coastal areas with associated environmental impacts, contradicting California's climate goals and disproportionately burdening disadvantaged communities.

Eliminating STRs will not cause visitors to disappear—demand for coastal access remains ever-present, and displaced visitors will be forced to find alternative accommodations that generate far greater environmental harm. STRs represent the most efficient use of existing housing stock for visitor accommodation. They utilize homes that already exist, avoiding the environmental costs of new construction while maximizing the utility of California's residential infrastructure. The LCPA would eliminate this efficient use pattern, forcing visitors into more resource-intensive alternatives.

When visitors can no longer access existing housing through STRs, they face displacement to hotels that consume dramatically more energy per guest. Hotels consume 2,989 kWh per person annually compared to 1,261 kWh for STRs—a 137% increase in electricity consumption. (*Ramboll Memorandum Re: Environmental Analysis of Short-Term Rental Regulation in Monterey County*, June 6, 2025, at 10 (“**Ramboll Report**”).)² Natural gas consumption follows a similar pattern, with hotels consuming 12,500 kBtu per person compared to 8,299 kBtu for STRs—a 51% increase. (Ramboll Report at 10.) Overall, GHG emissions from energy consumption per person would increase by 19% if guests shifted from existing STRs to hotels. (Ramboll Report at 11.)

When coastal STRs are eliminated, visitors seeking STR accommodations must also travel to more distant locations outside the restricted areas if they want to continue to utilize STRs for lodging. This displacement creates a cascade of environmental harms through dramatically increased VMT and associated emissions. Mobile source emissions from visitors displaced to more distant STRs and hotels would generate up to 294% more criteria air pollutant emissions and greenhouse gases compared to visitors staying in existing STRs when serving the same population. (Ramboll Report at 5.) This includes large increases across all major pollutants: volatile organic compounds, nitrogen oxides, carbon monoxide, sulfur oxides, particulate matter, and greenhouse gas emissions. (Ramboll Report at 5.)

The displacement to more distant locations also significantly increases fossil fuel consumption. Current STR usage without additional restrictions requires approximately 848 gallons of gasoline and 48 gallons of diesel per day. (Ramboll Report at 11.) After implementing the proposed restrictions that displace visitors to more distant STRs and hotels, daily fuel consumption would increase to 2,494 gallons of gasoline and 140 gallons of diesel—representing a 194% increase for both fuel types. (Ramboll Report at 11.)

Additionally, hotels themselves generate more trips than existing STR housing. According to the Institute of Transportation Engineers, hotels generate 7.99 trips per day compared to 3.55 trips per day for recreational homes. (Ramboll Report at 4.) This 125% increase in daily trips likely reflects hotels’ lack of comprehensive amenities—particularly kitchens—forcing guests to make additional trips for dining and other necessities that STR guests find provided within existing housing.

The elimination of existing housing capacity for visitors would also inevitably drive new hotel construction to meet persistent visitor demand for lodging near the coast, creating substantial additional environmental impacts the County has failed to analyze. This represents perhaps the most environmentally harmful consequence of displacing visitors from existing housing: forcing the construction of entirely new buildings when existing housing could serve the same function.

The Ramboll Report’s screening health risk assessment for a typical 250-room hotel construction project found an excess cancer risk of 27 in a million for the maximum

² The Ramboll Report is provided in Attachment B to this letter.

exposed individual—nearly three times the Monterey Bay Air Resources District's threshold of 10 in a million. (Ramboll Report at 15.) Cancer risks from constructing a new hotel exceed the health risk threshold up to 230 feet from construction areas, potentially affecting numerous sensitive receptors depending on hotel locations.

Hotel construction would also generate criteria pollutant emissions from heavy-duty equipment, fugitive dust from soil movement, and transportation of materials and equipment. Construction noise analysis shows sound levels ranging from 75 to 90 dBA at 50 to 500 feet during various construction phases—well above typical suburban background levels of 45-55 dBA and potentially exceeding Monterey County noise ordinance limits. (Ramboll Report at 16.)

The displacement patterns created by the LCPA could also concentrate environmental burdens in communities already suffering from elevated pollution exposure. Rather than dispersing visitors throughout existing housing stock in various neighborhoods, the LCPA would channel displaced visitors into concentrated hotel zones and high-traffic corridors that pass through disadvantaged communities.

The California Office of Environmental Health Hazard Assessment's CalEnviroScreen 4.0 data reveals that multiple census tracts in the Monterey/Seaside-Salinas-Watsonville corridor—where existing hotels are concentrated—already rank in the 80th percentile and above for cumulative environmental burden. (Ramboll Report at 6.) Census Tract 6053013100 (Monterey) currently ranks in the 80th percentile for elevated traffic impacts, while other tracts show high rankings for diesel particulate matter exposure. (Ramboll Report at 7.) By displacing visitors from dispersed existing housing to concentrated hotel zones and more distant locations requiring travel through these communities, the LCPA would force already overburdened populations to absorb additional environmental impacts.

The displacement from existing housing to more distant locations and new hotel construction directly contradicts California's established environmental policies. The state has committed to aggressive greenhouse gas reduction targets, VMT reduction goals, and efficient use of existing infrastructure as key strategies for addressing climate change. The 194% increase in daily fuel consumption and 294% increase in criteria pollutant emissions represent precisely the type of inefficient resource use that California's climate policies seek to avoid. By forcing visitors away from existing housing into more carbon-intensive patterns, the LCPA undermines state efforts to reduce transportation emissions and promote efficient land use. The inevitable new hotel construction triggered by displacing visitors from existing housing contradicts California's emphasis on utilizing existing infrastructure before building new facilities. The state's climate policies prioritize maximizing the use of existing buildings and infrastructure to avoid the substantial carbon footprint associated with new construction.

The County failed to analyze these reasonably foreseeable environmental impacts in its 2023 Environmental Impact Report. Courts have consistently held that agencies cannot ignore the indirect environmental consequences of their actions, particularly when those consequences are predictable and quantifiable.

C. The LCPA creates a false solution to housing challenges while ignoring the County's actual obligations to build new affordable housing.

The proposed LCP amendment is premised on the false notion that restricting short-term rentals will meaningfully address Monterey County's housing affordability crisis. This premise is not only incorrect but dangerously counterproductive. The LCPA would eliminate a critical source of income that helps many homeowners afford their housing costs while doing nothing to create the new affordable housing units the County is legally obligated to provide. Rather than solving housing challenges, the LCPA creates new barriers to both homeownership and coastal access without addressing the fundamental cause of California's housing crisis: chronic underproduction of housing supply.

The data conclusively demonstrates that STRs constitute such a small percentage of Monterey County's housing stock that their restriction cannot meaningfully impact housing availability. STRs account for less than approximately 2% of all residential parcels in the county, with only 2,190 average listings out of 98,526 total residential parcels. (Ceto Report at 48.) This includes 547 hosted STRs where the primary resident is present during rentals, meaning these properties continue to provide housing for residents while also accommodating visitors. (Ceto Report at 48.)

When examining only unhosted STRs that could theoretically be converted to long-term housing, the numbers become even smaller. Unhosted STRs account for under 2 percent of all residential properties countywide. (Ceto Report at 48.) In the context of a housing crisis affecting millions of Californians, eliminating a fraction of 2 percent of housing from STR use cannot provide meaningful relief, particularly when these properties are highly unlikely to be converted to long-term housing. The Ceto Report shows that 48% of all residential properties in Monterey County are not owner-occupied and are likely second homes, investment properties, or other non-primary residential uses. (Ceto Report at 48.) It is highly unlikely that second homeowners who currently rent their houses potentially only a few times per year on a short-term basis would transition these houses to long-term rentals, especially given the value of the properties at issue. In the Coast-Big Sur planning area, typical home prices exceed \$2.2 million according to the Zillow Home Value Index. (Ceto Report at 45.) Even were these STRs to be listed as long-term rentals, their conversion from STR use would not create affordable options for local residents.

In contrast, non-coastal planning areas with more affordable housing show minimal STR activity. Greater Salinas, Central Salinas Valley, North County, and South County contain over 47,000 residential parcels, with only about 1% used as STRs. (Ceto Report at 48.) These areas have housing values below the statewide average and represent the locations where affordable housing exists and could be developed, yet they show minimal STR impact because they are not tourist destinations. However, restricting coastal STRs could push STR activity into these inland areas as displaced visitors seek alternative accommodations, potentially impacting those affordable housing markets the LCPA

purports to protect while forcing visitors to travel greater distances to reach coastal destinations.

California's housing affordability crisis is not the result of the relatively new use of online STR booking platforms; it stems from decades of systematic underproduction of housing supply relative to population. Numerous academic studies have documented that California has built roughly half the housing needed to keep pace with population since 1980. This chronic underproduction has driven prices up across all housing types and income levels, creating the current affordability crisis.

Eliminating STRs will not solve this multi-faceted issue. It will diminish home occupancy. As a recent study conducted by the Milken Institute notes: “the notion that decreasing STR supply will mitigate California’s extreme housing shortage is not supported by the evidence. The only solution to California's housing crisis is to provide more housing: specifically denser, more affordable multifamily housing units.”³ Professor Betsey Stevenson, former Chief Economist at the U.S. Department of Labor and Member of the Council of Economic Advisers, writes that banning STRs in fact undermines efforts to “make [housing] more affordable.” STRs help residents “recoup some of their investment and make city living more affordable” rather than contributing to unaffordability.⁴ STRs thus provide a crucial income source that helps residents manage housing costs rather than competing with residents for housing.

This is particularly important in high-cost coastal areas where rising property taxes, insurance premiums, and utility costs threaten to displace long-term residents. Many STR hosts use rental income to offset mortgage payments, property taxes, and maintenance costs that would otherwise make homeownership financially impossible. This is especially critical for middle-class families and seniors on fixed incomes who purchased homes years ago but now face escalating costs that exceed their current incomes. Income from STRs allows these residents to remain in their communities rather than being forced to sell and relocate to more affordable areas.

For aspiring homeowners, STRs provide an important pathway to homeownership by allowing property purchases that would otherwise be financially impossible. Young families often purchase homes with the intention of using STR income to help qualify for larger mortgages or offset initial ownership costs. Eliminating this option reduces homeownership opportunities and forces more residents into an already tight rental market.

³ Alissa Dubetz, Matt Horton, and Charlotte Kesteven, *Staying Power: The Effects of Short-Term Rentals on California’s Tourism Economy and Housing Affordability*, MILKEN INSTITUTE (May 2022), https://milkeninstitute.org/sites/default/files/2022-05/Short_Term_Rentals_California.pdf.

⁴ Betsey Stevenson, *Banning Airbnb Won’t Solve the Housing Crisis*, BLOOMBERG NEWS (July 8, 2024), <https://www.bloomberg.com/opinion/articles/2024-07-08/banning-airbnb-will-not-make-housing-more-affordable>.

STRs also provide immediate housing for people in transition—those relocating for work, families dealing with home repairs or renovations, individuals between long-term leases, and others needing temporary accommodation. STRs can supply housing for people who are unable to pay steep move-in costs, which typically include advance payment of first and last month's rent and a sizeable security deposit. STRs allow immediate occupancy without substantial up-front costs, providing housing flexibility that the formal rental market cannot match. STRs also provide temporary workforce housing. The cleanup and recovery efforts after the catastrophic January 2025 wildfires in Altadena, Los Angeles's Pacific Palisades and Malibu could not have proceeded without housing for hundreds of nonlocal government and private sector workers.

Rather than restricting STRs, Monterey County should focus on meeting its legal obligations to facilitate new affordable housing production. Under California's Regional Housing Needs Allocation ("RHNA") process, the County has specific targets for new housing units across different income categories that it has consistently failed to meet. The LCPA does nothing to address the underlying barriers that prevent affordable housing production in the County: exclusionary zoning that prohibits multifamily development, lengthy and expensive environmental review processes, inadequate infrastructure to support new development, and local opposition to affordable housing projects. These systemic issues require comprehensive policy reforms, not symbolic gestures that restrict property rights without actually creating housing units.

The LCPA sends negative signals to housing developers and investors that could reduce housing production in Monterey County. Developers evaluate markets based on regulatory predictability and the ability to use properties flexibly to maximize returns and manage risk. STR restrictions reduce property value and flexibility, making development projects less attractive and potentially economically infeasible. Real estate investors consider STR potential when evaluating property purchases and development opportunities. Eliminating this option reduces property values and investment appeal, potentially leading to reduced development activity throughout the County.

The LCPA's arbitrary restrictions and high fees (\$965 annual license plus \$5,500 Use Permit for Commercial STRs, and potentially a \$12,000 CDP) may also violate the constitutional principles established in Supreme Court cases, such as *Nollan*, *Dolan*, *Cedar Point Nursery*, and *Sheetz*. (Ceto Report at 53.) These fees appear to lack any nexus to actual regulatory costs or impacts, functioning instead as punitive measures designed to eliminate STRs through financial burden rather than legitimate regulatory oversight. Under the Supreme Court's takings jurisprudence, such fees must bear an essential nexus to legitimate government interests and be roughly proportional to the impacts they purport to address. The County has provided no evidence that \$12,000 for a CDP or \$5,500 for a Use Permit reflect actual administrative costs or mitigation of specific harms.

D. The proposed LCPA is fundamentally flawed and should be modified to assure compliance with the coastal land use plan portion of the County's LCP to provide affordable access to the coast.

The proposed LCPA needs to comply with the coastal land use plan (LUP) portion of the County's LCP. That is because the County proposes only coastal zoning ordinance amendments for its STR restrictions, for inclusion in its LIP (the local implementation plan). Therefore, the standard by which the Commission should review the STR restrictions is the LUP: it may only reject these restrictions if they "do not conform with, or are inadequate to carry out, the provisions of [the county's] certified land use plan," and rejection of the STR restrictions by the Commission must specify the LUP provisions that any rejected STR ordinance provisions do not conform with or that the Commission will find cannot be adequately carried out by those ordinance provisions. (See Public Resources Code, § 30513, subd. (b).)

The LUP component of the LCP must meet the requirements of and be adequate to carry out the Coastal Act's Chapter 3 policies (PRC section 30200 et seq.), including those governing public shoreline access. (Public Resources Code § 30512, subd. (c).) The county's LUP incorporates those policies. So, to that extent, the LCPA must conform with the Chapter 3 policies.

Old regional LUP portions here are silent on STRs (e.g., the one for Big Sur), which should mean STRs are allowed in residential zones (*Kracke, Keen*), which means the 2024 STR restrictions cannot be found to conform with, or adequate to carry out the LUP.

As discussed above, the LCPA is based on many false, unsupported and prejudicial assumptions, and is fundamentally flawed. Specific to STRs, the County falsely assumes that persons who rent a home for 31 days or more drive less, have less impact on onsite wastewater treatment systems or are less likely to create a nuisance than persons who rent a home for less than 30 days. There is absolutely no evidence, and the County has provided none, to support this assumption.

The County also assumes, again without evidence, that reducing STRs will reduce nuisance claims caused by short-term renters. The available evidence contradicts the County's assumptions. County records in July 2024 showed only 7 STR-related nuisance complaints. This is only **0.8%** of the 825 STRs identified in the LCP EIR study. This data does not support using elimination of nuisances as a basis for the proposed widescale restrictions included in the LCPA. Besides, the County has many alternative, less burdensome options to address legitimate concerns about problem STRs without punishing all hosts and coastal visitors by eliminating them and thereby reducing coastal access.

In addition to the numerous false assumptions, the County's LCPA has fundamental flaws listed and discussed below: (a) Classification of STRs as commercial use [LCP Sec. 1, para. C.]; (b) Unhosted commercial STR bans in Big Sur and the Low Density Residential Zoning District in the Carmel Area Land Use Plan (including the Carmel Highlands) [LCP Sec. 17.F.3.a.]; (c) 183-day residency requirement for hosted

rentals [LCP Sec. 17.B.10.]; (d) The 4% cap on unhosted commercial STRs [LCP Sec. 17.F.3.]; (e) Delegation of approval to persons with private road agreements [LCP Sec. 17.F.4.]; (f) Coastal Development Permit requirement [LCP Sec. 17.F.1.]

1. Classifications of STRs⁵

a. Short-term vacation rental definition

The County's LCPA defines "Vacation Rental" to mean, "the use, by any person, of Residential Property for transient lodging where the term of occupancy, possession, or tenancy of the property by the person entitled to such occupancy, possession, or tenancy for a period of 30 consecutive calendar days or fewer, counting portions of calendar days as full days." "Vacation Rental" includes Commercial Vacation Rentals, Homestays, and Limited Vacation Rentals. "Vacation Rental" does not include a bed and breakfast facility, hotel, motel, hostel, inn, rooming house, boardinghouse, rooming or boarding." (Section 17.B.14.)

The County's definition of "vacation rental" is divorced from the payment of rent or any in-kind exchange. "Vacation rental" therefore applies to any occupancy of less than 30 days whether the occupant pays rent or offers something of value for the right to occupy. As a result, the LCPA prohibits anyone from occupying a property for less than 30 days whether or not they pay rent.

The LCPA would therefore prohibit a property owner from using their own property for less than 30 days. It would also prohibit a homeowner from: a) allowing family members to stay at the property for less than 30 days, b) allowing a friend to stay, c) having a house sitter stay for a few days to watch the property. Under the LCPA, these guests would be considered occupants residing in the property for less than 30 days. The County's regulation as it applies to these situations is clearly unconstitutional. (See, e.g., *Tom v. City and County of San Francisco* (2004) 120 Cal.App.4th 674, 683 [governmental intrusion into privacy rights in homes implicates constitutional rights].) "Furthermore, by forbidding STR owners from allowing guests of their choice on their property for a duration of less than 30 days, the County's proposed LCPA balances away "a 'fundamental element of the property right' that cannot be balanced away." (*Cedar Point Nursery v. Hassid* (2021) 594 U.S. 139, 158 [210 L.Ed.2d 369, 388].)

b. Commercial Use

The County's LCPA classifies and distinguishes between three types of short-term vacation rentals: commercial vacation rentals, limited vacation rentals, and homestays. (Section 1, para. C.) MCVRA opposes the County's classifications and regulation of commercial vacation rentals and limited vacation rentals. The difference between commercial vacation rentals and limited vacation rentals is the frequency of use. Whether

⁵ The LCPA refers to short-term rentals as vacation rentals. However, there is no basis to refer to all such rentals as "vacation" rentals because visitors use short-term rentals for a variety of uses, including temporary work assignments, short-term housing needs, healthcare needs, family visits, etc.

a property is rented 3 times a year or 20 times a year has no bearing on the character of the property's use.⁶

The County's labeling of properties rented more than 3 times a year as "commercial" is a poorly disguised attempt to characterize the rental as a business use giving the County greater authority to regulate the use. However, regardless of the number of times a property is rented in a year, there is nothing commercial about the renter's residential use of a residential property in a residential zone.

In *Brown v. Montage at Mission Hills, Inc.* (2021) 68 Cal.App.5th 124, 134, the court considered the defendant's claim that the owner's use of the property for STRs was a business or commercial use. The court rejected the argument noting that the owner is not conducting or operating a business or carrying on an occupation within her property. The property is used as a single-family dwelling by tenants who use the property for residential purposes the same as any owner-occupied property. (See, e.g., *Brady v. Superior Court of San Mateo County* (1962) 200 Cal.App.2d 69, 81 ["single family dwelling, implies that any building so constructed would contain a central kitchen, dining room, living room, bedrooms; that is, constitute a single housekeeping unit."]) When a short-term renter sleeps at the property, the renter's use is no less residential than when a neighboring owner uses his or her property for sleeping. When a renter prepares meals in the kitchen, the renter's use is no less residential than when a neighboring owner uses his or her property for eating. When a renter showers in the bathroom, the renter's use is no less residential than when the neighboring owner uses his or her shower. When a renter entertains friends, the renter's use is no less residential than when the neighboring owner entertains friends at his or her property. The list of common residential activities a renter engages in which are identical to the activities occurring in an owner-occupied or long-term renter occupied property is long. One thing is certain; the tenant's activities are residential in nature and there is no "business, occupation, or commercial" activity taking place or being conducted within the confines of the residence.

Courts in several other states have similarly concluded that renting to tenants who use the property for residential purposes, such as eating, sleeping, bathing and relaxing, is not a business or commercial activity. (See, e.g., *Houston v. Wilson Mesa Ranch Homeowners Ass'n* (Col. App. 2015) 360 P.3d 255, 260 ["We agree with the cases discussed above and conclude that short-term rentals such as [plaintiff's] are not barred by the commercial use prohibition in the covenants."]; see also *Slaby v. Mountain River Estates Residential Ass'n* (Ala. Civ. App. 2012) 100 So.3d 569, 579 ["[P]roperty is used for 'residential purposes' when those occupying it do so for ordinary living purposes. Thus, so long as the renters continue to relax, eat, sleep, bathe, and engage in other incidental activities . . . they are using the [property] for residential purposes."]; *Wilkinson v. Chiwawa Cmty. Ass'n* (Wash. 2014) 18 Wn.2d 241, 253-254, 327 P.3d 614 [short-term rentals for residential use do not violate covenants prohibiting commercial uses]; *Estates*

⁶ As with the cost of permitting, the County provided no analysis or justification for its selection of 3 rentals as the distinction between "commercial" and "limited" vacation rentals.

at *Desert Ridge Trails Homeowners' Ass'n v. Vazquez* (N.M. App. 2013) 300 P.3d 736, 743 [short-terms rentals are not a business or commercial use prohibited by HOA rules or covenants].)

There is no rational basis for designating vacation rentals as commercial based on the frequency of use. They are a residential use no matter how often they are rented. Should the County wish to regulate rentals used more than 3 times per year, it is incumbent on the County to present evidence or analysis, rather than assumptions and bare conclusions, showing that properties rented more than 3 times per year have adverse environmental or community impacts not associated with the use of a home by a tenant or owner for more than 30 days.

2. Ban on Unhosted Rentals in Big Sur and Carmel Highlands

If the Commission allows the STR exclusion areas to stand, the County will have effectively prohibited STRs along the entire coastline of unincorporated Monterey County. The coastline in the unincorporated area of Monterey County is approximately 100 miles long. The County's LCPA prohibits unhosted rentals in Big Sur and Carmel Highlands. The LCPA will eliminate coastal STRs on private roads in areas including the entire Del Monte Forest/Pebble Beach area. By prohibiting unhosted rentals in these areas, the LCPA will eradicate unhosted STRs from all but 6 miles of the coastline. Unhosted STRs would be allowed in a narrow band of coastline just south of Carmel-by-the-Sea (5 miles), and Monterey Dunes Colony (1 mile). The LCPA contradicts the legislative objective to **maximize** public recreational opportunities in the coastal zone. The LCPA furthers a parochial policy to **minimize** public recreational opportunities in the coastal zone.

The contention by some proponents of the County's LCPA that the Big Sur land use plan prohibits STRs is factually and legally incorrect. The 40-year-old Big Sur LUP does not mention STRs. The appellate opinions in *Greenfield v. Mandalay Shores Community Assn.* (2018) 21 Cal.App.5th 896, *Kracke v. City of Santa Barbara* (2021) 63 Cal.App.5th 1089, 1097, and *Keene v. City of Manhattan Beach* (2022) 77 Cal.App.5th 142, all have made clear that when a local government's coastal land use regulations do not expressly prohibit STRs, they are permitted.⁷ The categorical ban on "commercial"

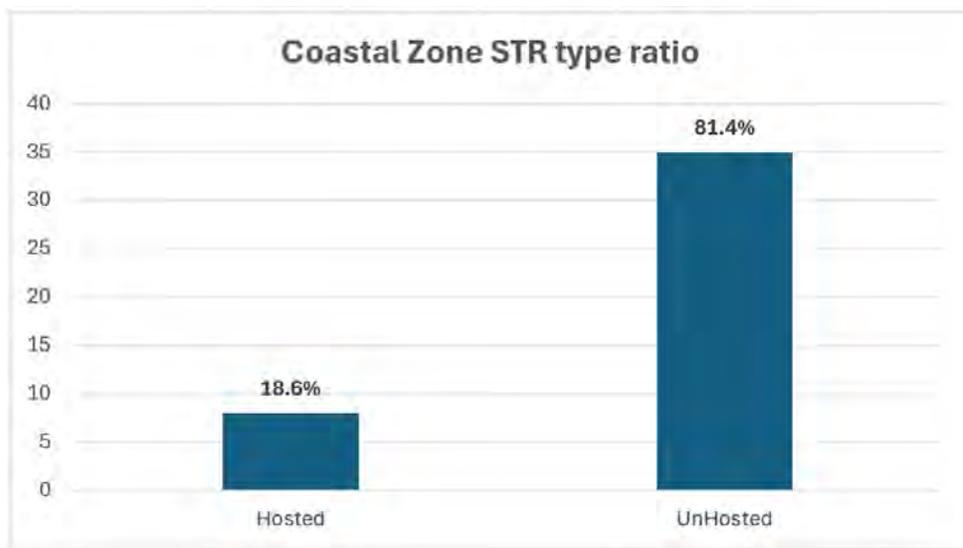
⁷ "Respondent claims that the STR ban is consistent with City's R-G-1 zoning but points to nothing in the coastal zoning ordinance that says that the rental of a single-family dwelling for 29 days is prohibited." (*Greenfield*, 21 Cal.App.5th at p. 901 [rejecting Mandalay Shores's argument that the short-term rental of a single-family dwelling is a commercial use of property, similar to a bed and breakfast].)

"The LCPs in both cases [*Greenfield* and *Kracke*] were certified in the 1980s, decades before STRs became popular due to the availability of Internet booking services. The City incorrectly contends that because STRs are not expressly included in the LCP, they are therefore excluded, giving the City the right to regulate them without regard to the Coastal Act." (*Kracke*, 63 Cal.App.5th at p. 1097.)

In *Keen*, the court concluded that the zoning ordinances "certified by the Commission [before the advent of online bookings] allow rentals of single- and multifamily residences in residential zones for any duration, including short-term rentals of the Airbnb variety." (77 Cal.App.5th at p. 150.) The court reached this conclusion because the city's certified coastal zoning ordinance plainly allowed residential uses in single- and multi-family residential zones, whether by owners or renters – "renters are common in cities, as

vacation rentals in the vast Big Sur planning area violates the Coastal Act and thus should not be certified. As proposed, the LCPA amends only the County’s coastal zoning ordinance, and not the Big Sur LUP. The Commission should reject the LCPA because it does not “conform with, or [is] inadequate to carry out, the provisions of the certified land use plan.” (Public Resources Code, § 30513.) *By prohibiting what is allowed under the LUP, the LCP violates the Coastal Act.*⁸

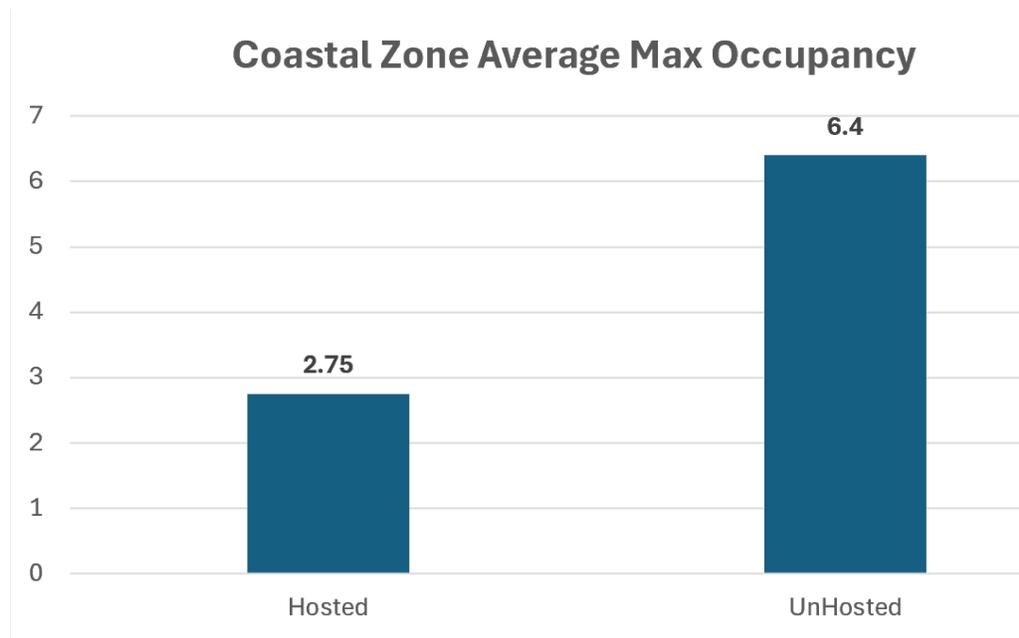
The Commission should reject the County’s purported balancing attempt of allowing “hosted” rentals in these areas. A ban on unhosted rentals is effectively a ban on all rentals. Unhosted STRs are the most frequently used and, as discussed above, are necessary to ensure affordable coastal access. Unhosted STRs comprise the vast majority of the STR inventory in Monterey County and almost all STRs within the coastal zone, including areas up to one mile from the shoreline. (Ceto Report at 30.) Unhosted STRs represent the vast majority of listings within a half mile radius (i.e., a ten-to-fifteen-minute walk) of the coast. Even more significantly, coastal unhosted STRs, which have a higher average guest capacity than coastal hosted STRs, account for 90% of total coastal STR guest capacity. (*Id.*, Table 6 [23,631 coastal unhosted STRs vs. 2,725 coastal hosted STRs].) Unquestionably, if the Commission approves the exclusion of unhosted STRs from the market proposed by the County, it will cause a massive loss of overnight visitor access to the coast.



everyone knows” (*id.* at p. 149), and it did so without exception for short-term renters. “Because its ordinances say nothing about the duration of rentals, the City cannot credibly insist its ordinances permit long-term residential rentals but have always banned short-term rentals. That interpretation makes no sense.” (*Ibid.*)

⁸ See 70 Ops.Cal.Atty.Gen. 220-221, 225-226 (1987).

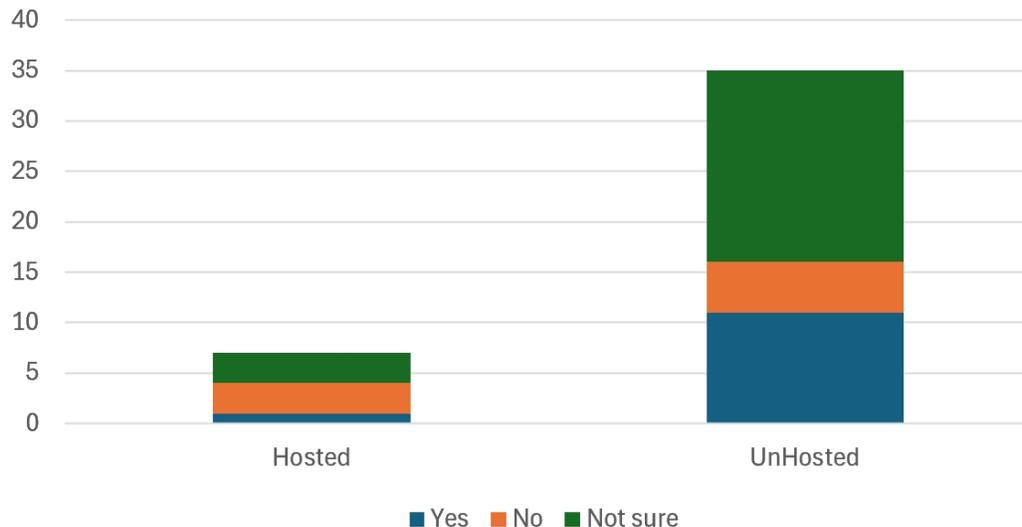
AirDNA monthly data from 2018 to 2024, excluding 2020, indicates that *unhosted* STRs consistently have higher occupancy rates than hosted STRs. There is a simple explanation for this: the overwhelming majority of short-term renters do not want to stay in a residence occupied by the owner or a manager. For privacy and other legitimate concerns, including security, they prefer a rental without the owner or manager and would never rent if required to share the space.



The largest submarkets for STRs in the county are Carmel, the Greater Monterey Peninsula, and Carmel Highlands. In Carmel and Carmel Highlands, unhosted STRs are occupied at a higher rate than hosted STRs, and there are very few hosted properties. In the Greater Monterey Peninsula County Planning Area, both hosted and unhosted STRs are occupied at near 50%. Overall, the data shows that not only are hosted STRs less occupied, but there are also far fewer available, and even with the limited supply, they are not fully utilized.

MCVRA's own survey data reveals that few, if any, owners will apply for a hosted rental permit. As shown in the table below, **one** person confirmed they would apply for a hosted rental permit.

Coastal Zone will apply for permit



The overwhelming majority of STRs in the County are second homes. If the ban on unhosted rentals survives, those homeowners are unlikely to transition to a hosted rental. It is not consistent with the nature of their use of the property. They typically do not live in the area, so they are not available to be present during a hosted rental. Also, if they use their property, they use it with their family or friends and, assuming extra guest capacity is available, the same privacy concerns suggest they won't operate a concurrent hosted STR while they use their property.

The County's proposed large-scale bans on unhosted STRs fly in the face of the public access policies of its certified coastal land use plan and the public access and recreation policies of Chapter 3 of the Coastal Act, incorporated into the land use plan.

3. Homestay Residency Requirement

For Homestay permits, the LCPA requires the owner or principal resident to occupy at least one bedroom within the vacation rental while it is being rented as a vacation rental. (Section 17.B.5.) Homestays require that the STR be the "Owner's Primary Residence." The LCP defines "Owner's Primary Residence" to mean "a Residential Property lived in by the Owner for at least 183 days. ..." (Section 17.B.10.)

Residency requirements have been rejected in California and other states as violative of the Dormant Commerce Clause of the United States Constitution. (See U.S. Const. art. I, § 8, cl. 3; *South Lake Tahoe Property Owners Group v. City of South Lake Tahoe* (2023) 92 Cal.App.5th 735, 766-767 [an initiative measure's permanent resident exception to a ban on short-term rentals facially discriminated against interstate commerce and was per se invalid under the dormant Commerce Clause]; *Hignell-Stark v. City of New Orleans* (5th Cir. 2022) 46 F.4th 317, 326 [the City's residency requirement

discriminated against interstate commerce because it forbids out-of-state owners from participating in the market].)

In *South Lake Tahoe* the measure allowed an exception for permanent residents, which was defined as a person who lived in the home for the majority of the year, i.e., 183+ days. In *Hignell-Stark*, the ordinance prohibited an owner from getting a license unless the property was their primary residence.

The County's residency requirement for homestays is the same as in *South Lake Tahoe* and *Hignell-Stark* and similarly violates the provisions of the United States Constitution. The Commission cannot approve an LCPA containing an obviously unconstitutional provision.

4. Permit Caps and Other Limits on Access

Rather than endorsing blanket bans, the Commission has favored nuanced STR policies tailored to local conditions to mitigate negative impacts while preserving access. One alternative strategy the Commission has supported includes capping the total number or density of STRs. Many coastal jurisdictions have enacted caps, often as a percentage of housing stock or a fixed number of permits. The Commission has approved such caps if and when properly calibrated to local context. Examples: Trinidad limits STR permits to about 15% of homes to protect long-term housing; Marin County's new LCP caps STRs in each village (e.g. Dillon Beach can grow its STRs modestly, whereas other hamlets get tighter limits). Caps aim to prevent over-concentration of vacation rentals while accommodating existing STRs or a healthy visitor supply.

The County originally proposed a permit cap of 6% in its draft EIR on Commercial Vacation Rentals. There were no studies or analysis performed or considered to justify a 6% cap. Thus, the County's selection of 6% was arbitrary. In its revised EIR, the County doubled down on its arbitrary decision making and reduced the cap to 4%, based on nothing more than a few letters from residents. The County provided no explanation why it relied on these letters to reduce the cap to 4% nor did it provide any analysis to support a 4% cap on STR permits.

Limiting the number of bookings allowed per year for unhosted STRs to a very low level, or other controls such as minimum stays, forecloses visitor access to the coast -- in this instance, a coast visited by more than eight million people annually, a coast the scenic beauty of which constitutes "the primary driver" of the demand for access. (Ceto Report at 16.)

5. Delegation of approval to persons on private roads is unlawful.

The County's LCPA subjects "commercial vacation rental" property to Monterey County Code Chapter 16.80. (Sec. 17.F.4.) It provides, "A Commercial Vacation Rental that is not accessible directly from a public road shall be subject to Monterey County Code Chapter 16.80," and requires a permit applicant to provide notice to all properties with ownership access to the private road. A single person on a private road can stop a permit by objecting.

Incorporating Monterey County Code Chapter 16.80 into the LCPA will eliminate STRs on private roads, including the entire Del Monte Forest/Pebble Beach area. The Pebble Beach Company has stated it will oppose all permits for commercial vacation rentals and homestays.

By requiring permit applicants to provide notice to parties with an interest in a private road, the County is granting those parties authority to essentially veto the issuance of a commercial vacation rental permit, which is exclusively within the County's authority. That is an unconstitutional delegation of police power. The constitutional rule of non-delegation to private persons serves to ensure administrative decision-making is not "made potentially subservient to selfish or arbitrary motivations" of nearby residents. (*Schulz v. Milne* (N.D.Cal. 1994) 849 F.Supp. 708, 712; see *Washington ex rel. Seattle Title Trust Co. v. Roberge* (1928) 278 U.S. 116, 120-121 [73 L.Ed. 210, 213]; see also *County Mobilehome Positive Action Com. v. County of San Diego* (1998) 62 Cal.App.4th 727, 737; *Alameda County Land Use Assn. v. City of Hayward* (1995) 38 Cal.App.4th 1717, 1724-1725.) The County's delegation is also inconsistent with prior Commission practice. The Commission's decisions are without prejudice to private easement claims. And when hearing CDP applications or appeals, the Commission historically does not adjudicate disputes between private parties. It is also not the proper forum to adjudicate private easement claims.

This issue has also been considered previously. The Commission did not want the private road ordinance in the County Code to be incorporated into the LCP. Allowing the County to include compliance with Chapter 16.80 backdoors the ordinance into the LCP.

6. The Coastal Development Permit requirement for Commercial Vacation Rentals is unlawful and imposes unnecessary burdens on the Commission and its staff.

Section 17.F.1 of the LCP requires a CDP for commercial vacation rentals. Requiring a CDP is contrary to law because STRs are not a "development" under the Coastal Act. (*Coastal Protection Alliance Inc. v. Airbnb, Inc.* (2023) 95 Cal.App.5th 207.)⁹ Relying on *Keen*, the *Coastal Protection Alliance* court reasoned that a change in density and intensity turns on the land's existing use. Thus, "using a residence as an STR is a residential use, not a change in use, and thus not a development." (*Coastal Protection Alliance*, 95 Cal.App.5th at p. 218.)

Notably, for the court, requiring a CDP would "undermine the Coastal Act's goal of maximizing public access to the coast." (*Id.* at p. 220.) Our survey data proves this point.

⁹ In *Coastal Protection Alliance*, the court of appeal rejected the claim that STRs are "developments" subject to the CDP requirement. The court explained: "Taken literally, CPA's argument would apply any time there is an increase in the number of occupants at a residence. Following this reasoning...[development would occur following] a lease to a family of six, at a residence previously rented by a family of four[;] [or]if the occupants had a baby, took in a house guest or hired a live-in nanny. (*Id.* at p. 217.)

Few people can carry the financial burdens of applying for a CDP. The CDP requirement poses an unduly burdensome requirement on permit applicants as well as the Commission. The CDP review and decision-making process can take several months to a year or more depending on the level of public interest and other factors. The cost of the CDP application process exceeds \$12,500. The overwhelming majority of jurisdictions having a short-term or vacation rental ordinance issue permits on an administrative basis. Requiring a CDP for Commercial Vacation Rentals opens the door to third-party challenges and litigation contesting the issuance of a CDP, thus further delaying and burdening the process. For these types of uses, there is no rational basis to require an applicant to obtain a CDP to rent their property on a short-term basis.

E. Conclusion

The evidence is unambiguous. The County's LCPA would eliminate substantial coastal accommodation capacity, displace millions of annual visitors from STRs into more environmentally destructive patterns, and create a false solution that addresses none of Monterey County's actual housing obligations. Most damaging of all, it would permanently sever the connection between California's diverse population and their coastline, transforming what the Legislature has declared to be "essential elements of coastal and park access" into luxuries available only to those who can afford high hotel rates.

The LCPA represents a fundamental betrayal of the California Coastal Act's core promise: that California's coastline belongs to all residents, not just the wealthy few who can afford luxury accommodations. The Commission should reject the false premise that restricting STRs will meaningfully address housing challenges. Instead, the Commission should encourage comprehensive approaches that increase both housing production and coastal access opportunities through coordinated planning, adequate funding, and policies that recognize the complex relationships between housing, economic development, and environmental protection.

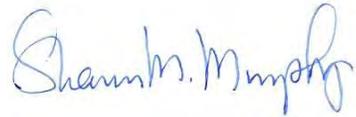
The Legislature's recent reaffirmation that affordable coastal accommodations are "essential" was not mere rhetoric—it was a direct response to precisely this type of exclusionary policymaking that has steadily eroded public access under the guise of local control. The Commission must reject the County's LCPA. It should suggest all modifications as will be necessary and appropriate to secure future approval of an LCPA that meets the Coastal Act's enduring promise of access for all, that is, an LCPA that fully cures its failures to conform to the public access and recreation policies of the Coastal

California Coastal Commission
June 12, 2025
Page 21

Act, which are part of the County's certified LUP. (Pub. Resources Code, § 30513, subd. (c).)

Sincerely,

SBEMP LLP



BY: Shaun M. Murphy

SMM: DY

c: Katie Butler (Katie.Butler@coastal.ca.gov)
Kevin Kahn (kevin.kahn@coastal.ca.gov)

Attachment A

CETO CONSULTING, LLC

Monterey County Accommodations

Market analysis of visitor demand for overnight accommodation and the role Short-Term Rentals play in ensuring sufficient supply and promoting affordability.



June, 2025

Monterey County
Overnight Accommodation Market Analysis

June 12, 2025

Prepared by Ceto Consulting, LLC

Sarah Jenkins

Kiki Patsch, Ph.D.

Phil King, Ph.D.

Executive Summary

This report evaluates the availability, affordability, and geographic distribution of overnight accommodations in Monterey County, California, with a particular focus on equitable access to the coast. It assesses both traditional lodging (hotels and motels) and the growing short-term rental (STR) market, examining how each sector contributes to or constrains public access, particularly for low- and moderate-income Californians. The analysis draws on spatial data, pricing, guest capacity, and the regulatory context to inform local planning, Coastal Act compliance, and policy decisions.

Table E1. Countywide Comparison of STR and Hotel Supply, Capacity, and Affordability

Accommodation	Total Rooms	Total Visitor Capacity	Mean ADR	Mean ADR Per Person	Percent of Total Coastal Area Capacity
STRs	18,057	43,502	\$ 302.00	\$ 75.00	80%
Hotels	8,809	22,903	\$ 316.00	\$ 122.00	20%

Key Findings

- STRs provide 80% of the total overnight visitor capacity in coastal areas of Monterey County.
- On a per-person basis, STRs are significantly more affordable than hotels, averaging \$75 per night compared to \$122 for hotels.
- STRs typically offer kitchens and larger spaces, helping to reduce additional trip costs such as dining out and to better accommodate families and groups.
- Visitors to coastal Monterey County closely mirror the state's demographic and income profile. Roughly half of all visitors fall below the state median household income (\$67,521 in 2020), underscoring the need for affordable overnight options.
- In Monterey County, 42% of all STRs are located in unincorporated areas under County jurisdiction. Of the total STR supply, 11% qualify as lower-cost coastal accommodations (LCCAs) under the California Coastal Conservancy's definition and fall within County jurisdiction. These units are especially vulnerable to proposed STR regulations.
- When considering only STRs within the Coastal Zone and/or one mile of the coast, 25% of LCCAs are in areas regulated by the County. Of those strictly within the Coastal Zone, 37% are under County jurisdiction.

Only 2.2% of all housing units in Monterey County are active short-term rentals, based on an average of 2,190 monthly active STR listings across the county's total housing stock. This report finds that STRs are essential to meeting Monterey County's visitor demand for overnight lodging. STRs provide much of the

County's overnight accommodation capacity, especially for lower-income visitors and those traveling with families. STRs fill gaps left by a hotel sector that is increasingly focused on high-end accommodations.

While the hotel market is stable, with occupancy rates above 60%, it does not fully meet the needs of today's leisure-driven travel patterns. Monterey County visitor demand peaks on weekends and during summer months, limiting the viability of lower-cost hotels and prompting a shift toward luxury accommodations. Since 2019, the County has lost 6% of its economy hotel rooms while expanding higher-end offerings.

STRs are better suited to this seasonal, weekend-focused demand. They offer greater flexibility, lower per-guest costs, kitchens that reduce additional expenses, and larger spaces that meet the needs of families and groups. In constrained areas such as Big Sur, STRs are often the only available overnight option.

Restricting STRs under current conditions would likely reduce the availability of affordable lodging and disproportionately impact lower-income households. Given that half of all coastal visitors earn below the state median income, such restrictions would undermine the Coastal Act's mandate under Public Resources Code § 30210 to ensure "maximum access . . . for all the people." They would also conflict with § 30213, which requires local governments to protect and encourage lower-cost visitor-serving facilities.

Ceto's previous report¹ provided recommendations to improve equitable coastal access and detailed how local STR ordinances, including licensing fees, density limits, and rental frequency caps, can inadvertently reduce affordability. These findings provide essential context for understanding the potential impacts of new STR restrictions currently under consideration. Regulatory decisions at the County level have significant implications for housing policy and compliance with the Coastal Act's public access mandates.

¹ See *Unequal Accommodations: Protecting Affordable Accommodations Along California's Coast*, <https://news.airbnb.com/report-short-term-rentals-can-help-increase-access-to-california-coast/>.

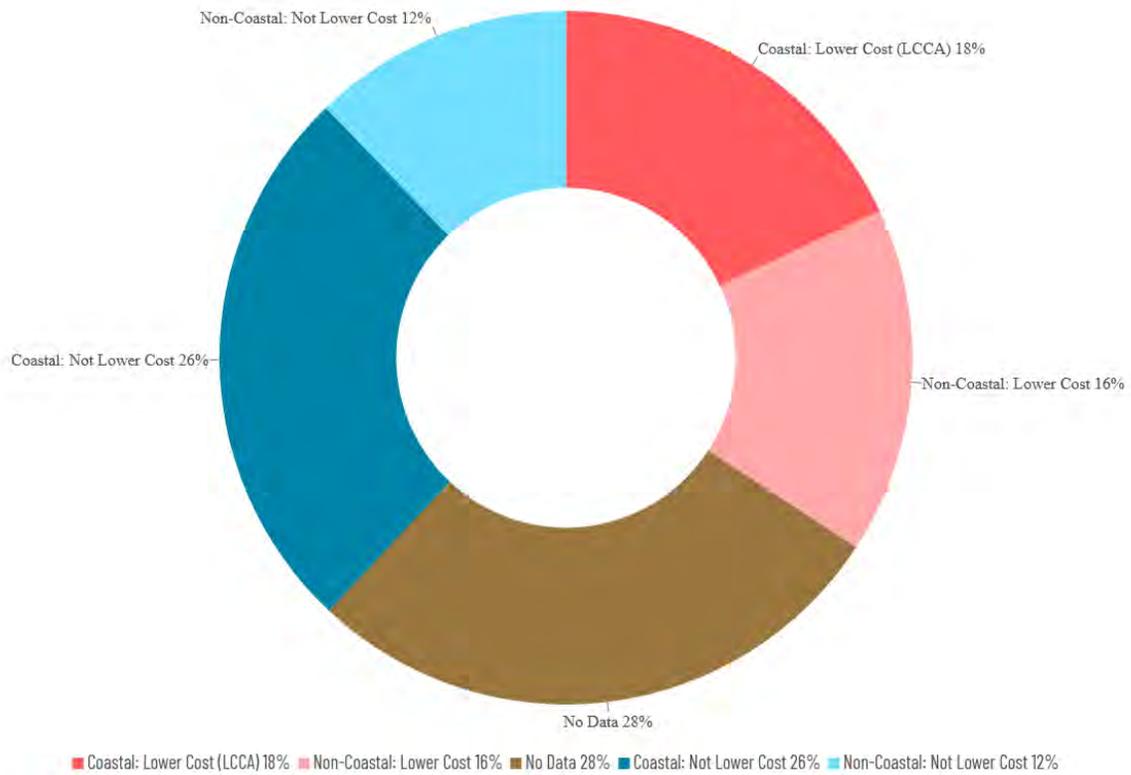
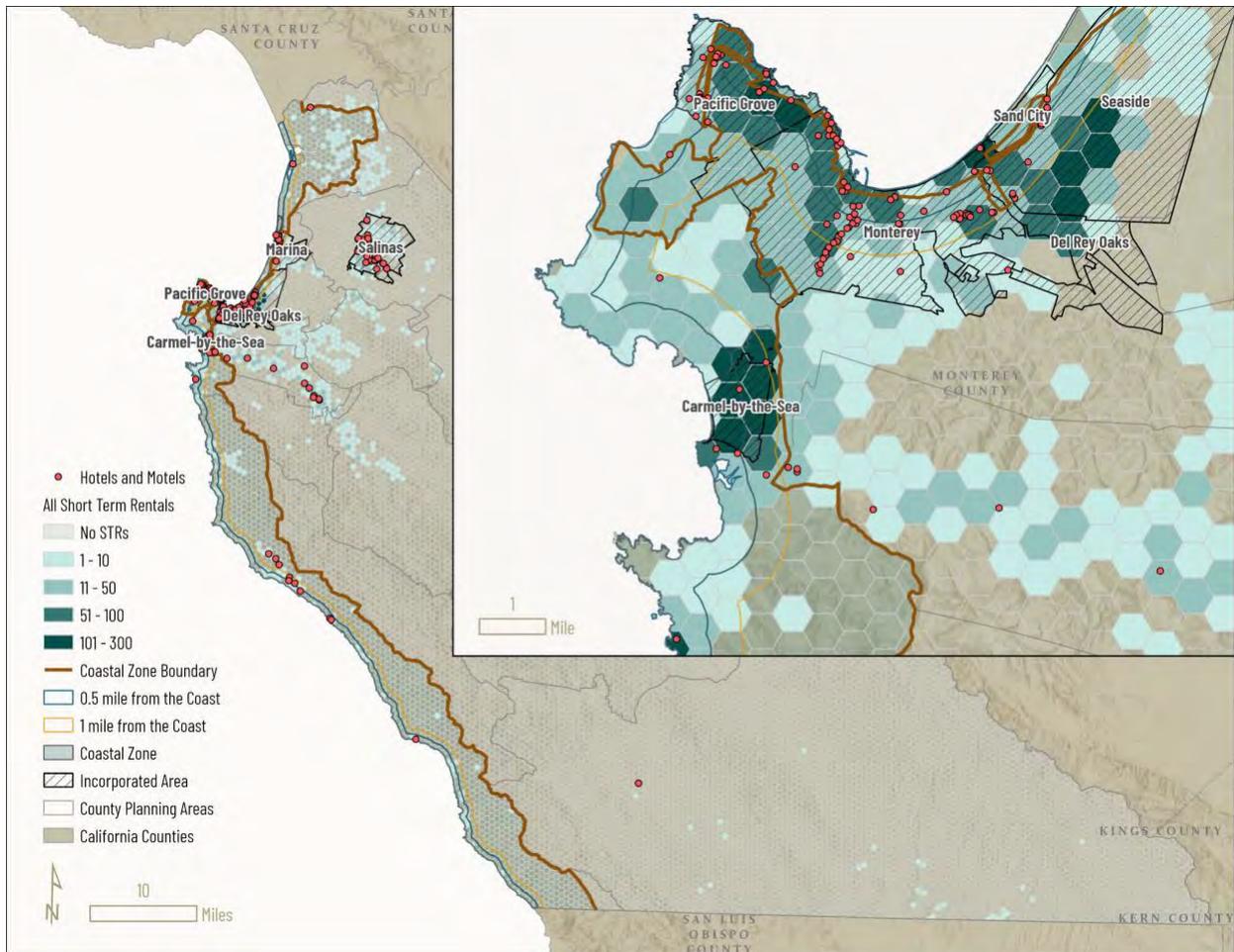


Figure E1: Distribution of Short-Term Rentals by Affordability Classification in Monterey County. Distribution of STR Affordability by Coastal and Non-Coastal Location. This pie chart displays the share of short-term rentals (STRs) that qualify as lower-cost coastal accommodations (LCCAs), other lower-cost STRs located outside the coastal area, and non-lower-cost STRs in both coastal and non-coastal areas. Coastal STRs that meet the LCCA threshold make up 18% of the

total sample, while 16% are lower-cost but located outside the Coastal Zone. Non-lower-cost STRs comprise 26% in coastal areas and 12% in non-coastal areas. The remaining 28% of STRs lack sufficient data for affordability classification.



Map E1: Distribution of Short-Term Rentals and Hotels in Monterey County with Coastal Proximity Indicators.

This map shows the spatial distribution of short-term rental (STR) properties aggregated within a 0.25-mile hexagonal grid, alongside the locations of hotels and motels, the California Coastal Zone boundary, and proximity corridors at 0.5 mile and 1 mile from the shoreline. The map also shows incorporated city boundaries and county planning areas for geographic reference.

Recommendations for Monterey County

1. **Expand Coastal-Area Accommodations**

Encourage or incentivize the development and permitting of lower-cost hotels, hostels, motels, and STRs within or near the Coastal Zone, particularly in areas underserved by affordable lodging.

2. **Support STR Affordability Through Policy Reform**

Streamline STR permitting, reduce associated fees, and adopt Good Neighbor policies to retain affordable STRs while protecting neighborhood character.

3. **Incentivize Affordable Lodging**

Implement tools such as in-lieu fees, LCCA set-aside requirements, or public subsidies to increase the supply of affordable accommodations, especially those suitable for families.

4. **Strengthen Coastal Access for Underserved Communities**

Expand programs such as “Explore the Coast Overnight” and include STRs as eligible accommodations for voucher or subsidy-based access.

5. **Align Local Coastal Programs STR policies with Coastal Act Mandates**

Ensure local coastal programs (LCPs) explicitly recognize STRs as a coastal access resource. Develop LCPs that protect, encourage, and provide for STRs, including STRs with average daily rates that meet the California Coastal Conservancy’s lower-cost coastal accommodations threshold. In doing so, implement the Coastal Act’s policies for providing maximum access for all the people (Pub. Resources Code, § 30210) and protecting, encouraging and, where feasible, providing lower-cost overnight visitor facilities. (Id., § 30213.) Public Resources Code § 30210 requires that “maximum access . . . for all the people” be provided to the coast, while § 30213 mandates that lower-cost visitor-serving accommodations be protected, encouraged, and, where feasible, provided.

Table of Contents

EXECUTIVE SUMMARY	2
Recommendations for Monterey County.....	6
1. INTRODUCTION & BACKGROUND	11
1.1 Policy Context.....	11
1.2 Analytical Scope.....	11
1.3 Structure of the Report.....	12
2. THE MONTEREY COUNTY COASTAL ZONE & PLANNING AREAS	14
3. MARKET DEMAND: VISITOR PROFILE AND LODGING NEED	16
3.1 Overnight Visitors & Accommodation Demand.....	18
3.2 A Tourism-Based Market.....	18
3.3 Hotel Demand.....	19
3.4 Demand for STRs in Monterey County.....	21
3.5. Coastal Access Equity.....	23
4. SUPPLY AND AFFORDABILITY: HOTELS AND STRS IN MONTEREY COUNTY	24
4.1 Supply of Monterey County Hotels.....	24
4.1.1 Hotel Market Composition.....	25
4.2 Supply of STRs in Monterey County.....	27
4.2.1 STR Market Composition.....	29
4.3 Supply of Hotels Compared to STRs.....	32
4.4 Accommodation Affordability.....	35
4.4.1 Demand from Low-Income Visitors.....	38
4.5 Market Summary.....	41
5. HOUSING MARKET CONTEXT AND STR IMPACTS	43
5.1 Monterey County Residential Property.....	43
5.2 Occupancy and Ownership.....	47
5.3 Distribution of STRs.....	48
6. MONTEREY COUNTY POLICY JURISDICTION	49
6.1 Incorporated Areas.....	50
6.2 STRs Under County Jurisdiction.....	51
<i>Monterey County Unincorporated Areas</i>	53
7. RECOMMENDATIONS	54
<i>Options for Monterey County</i>	54
APPENDIX A: DOMESTIC VISITATION	56
APPENDIX B: HOSTED AND UNHOSTED STRS	57
APPENDIX C: DETAILED STR CLASS BREAKDOWN BY COASTAL PROXIMITY	59
APPENDIX D: HOTEL DISTRIBUTION IN MONTEREY COUNTY	61
APPENDIX E: DETAILED MONTHLY STR PRICING	62

Definitions

AirDNA

A commercial data provider offering analytics on short-term rental (STR) activity, including listing counts, occupancy rates, guest capacity, and pricing. Used in this report to assess STR market patterns.

Assessed Value

The taxable value of a property as determined by the county assessor. Often lower than market value, it is used in this report to infer affordability, ownership trends, and geographic patterns in property values.

Average Daily Rate (ADR)

The average nightly rate paid for an accommodation unit. Used to evaluate cost, affordability, and seasonal pricing trends across hotels and STRs.

Coastal Area

For the purposes of this report, the Coastal Area includes all land within the officially designated Monterey County Coastal Zone and any remaining areas within 1 mile of the shoreline. This broader definition allows for more consistent spatial analysis across irregular boundary lines.

Coastal Proximity Corridors

Non-regulatory buffer zones extending inland from the shoreline to 0.5 mile and 0.5-1 mile from the coastline. These zones are used to analyze the relationship between visitor accommodations and proximity to coastal access.

Coastal Zone

The area regulated under the California Coastal Act, generally defined as land within 1,000 yards of the mean high tide line. In Monterey County, the boundary varies to include areas with scenic, environmental, or public access significance and extends several miles inland in places such as Big Sur.

County Planning Area (CPA)

Administrative land use regions defined by Monterey County (e.g., Greater Monterey Peninsula, Big Sur, Carmel Valley). Used in this report to organize STR data and compare geographic patterns in visitation and housing.

Explore the Coast Overnight

A grant program administered by the California State Coastal Conservancy that provides funding for overnight coastal experiences for underserved communities. The program helps increase access to the coast for populations that face economic, geographic, or cultural barriers.

Good Neighbor Policy

A set of operational requirements and behavioral expectations designed to minimize the impact of short-term rentals (STRs) on surrounding residents and maintain neighborhood quality of life. Typically included in local STR ordinances or permit conditions, Good Neighbor Policies address issues such as noise, parking, trash management, occupancy limits, and guest conduct. These policies often require STR operators to provide a 24-hour local contact, notify neighbors of STR operation, and respond promptly to complaints.

Guest Capacity

The maximum number of guests a lodging unit can accommodate. For STRs, this is typically based on the number of bedrooms and host-reported capacity. For hotels rooms, an average of 2.6 guests per room was used for calculations. This value is used to calculate per-person affordability and compare capacity across unit types.

Hosted STR

A short-term rental where the host resides on the property during the guest's stay. This includes listings identified by AirDNA as “private room” or “shared room.”

In-Lieu Fee

A payment made by a developer or property owner in place of directly providing a required public benefit, such as affordable lodging. Used by jurisdictions to support lower-cost accommodation development elsewhere.

Local Coastal Program (LCP)

A land use plan adopted by a local jurisdiction and certified by the California Coastal Commission. It governs development within the Coastal Zone in accordance with the California Coastal Act.

Lower-Cost Accommodation

An overnight lodging option priced at 75% or less of the statewide average daily rate (ADR) for hotels. For 2024, this equates to \$147 per night or less. When adjusted for an average occupancy of 2.6 guests, the per-person threshold is \$57.

Lower-Cost Coastal Accommodation (LCCA)

An overnight lodging option priced at or below 75% of the statewide hotel ADR and located within the official Coastal Zone or within 1 mile of the coast. As defined by the California Coastal Conservancy, this threshold in 2024 is \$147 per night or \$57 per person per night (assuming average occupancy of 2.6). LCCAs are a key metric for evaluating equitable coastal access.

Lower-Income Visitor

Lower income is defined as below the statewide California median income for 2024 of \$96,334.

Market Classifications

Standard categories used in the hospitality industry to classify lodging by quality and pricing. Common tiers include budget, economy, midscale, upscale, and luxury. These classifications help assess affordability and diversity in supply.

Occupancy Rate

The percentage of available rental nights that are booked during a given period. It is a key performance metric for both hotels and STRs and reflects market demand.

Parcel Ownership Proxy

A method to infer whether a property is owner-occupied. If the parcel's site address matches the mailing address on tax records, it is considered owner-occupied. A mismatch may suggest a second home, investment property, or STR use.

Placer.ai

A commercial provider of anonymized cell phone location data. Used to estimate coastal visitation volumes, visitor demographics, and travel distances in this report.

Short-Term Rental (STR)

A residential property rented for fewer than 30 consecutive days. STRs include both hosted and unhosted properties and represent a significant share of visitor-serving accommodations in coastal areas.

Smith Travel Research (STR Global or Smith Travel Data)

A leading provider of hotel industry data, including occupancy rates, ADRs, and market segmentation. Used to compare hotel performance and pricing with STRs in this report.

Tiered Permit System

A regulatory structure for STRs that assigns different levels of permits based on use intensity (e.g., primary residence, part-time rental, commercial rental). Higher intensity uses may face greater requirements or fees.

Unhosted STR

A short-term rental where the guest rents an entire home or unit and the host is not present during the stay. AirDNA categorizes these listings as “entire home” or “hotel” (the latter typically refers to small-scale rentals such as B&Bs, not commercial hotels).

1. Introduction & Background

Monterey County's coastal communities attract more than 8 million visitors each year, making them a vital driver of regional tourism, local economic activity, and public access to California's iconic shoreline. Balancing the need for overnight accommodations, housing affordability, and compliance with the California Coastal Act is both complex and contested.

This report evaluates the current landscape of overnight accommodations, including short-term rentals (STRs) and hotels, within unincorporated and coastal regions of Monterey County. The goal is to inform public agency decisions related to STR regulations and Local Coastal Program (LCP) updates.

The analysis addresses three central questions:

- Who visits the coast, and what types of accommodations do they seek?
- How do STRs compare to hotels in terms of affordability, availability, and guest capacity?
- What role do STRs play in the broader housing and access landscape, especially in providing overnight options near the coast?

Drawing on spatial, economic, and regulatory data, this report examines trends across the Coastal Zone, unincorporated County areas, and the County as a whole. The findings are intended to support data-driven policymaking and offer an objective framework for evaluating STR policies, coastal access, and consistency with the Coastal Act.

1.1 Policy Context

The California Coastal Act mandates "maximum public access" to the coastline and directs local governments to protect, encourage, and, where feasible, provide lower-cost visitor accommodations. Short-term rentals (STRs), generally defined as residential properties rented for fewer than 30 consecutive days, have become a prominent and often more affordable part of the coastal lodging landscape.

At the same time, the rapid expansion of STRs has generated concerns about their potential effects on long-term housing availability, neighborhood character, and the ability of local jurisdictions to enforce existing regulations. These competing priorities have made STR policy a focal point in balancing access, affordability, and community preservation along California's coast.

1.2 Analytical Scope

This report draws from a diverse range of proprietary and public data sources to evaluate overnight accommodations and coastal access in Monterey County. The analysis integrates the following datasets:

- **Visitor data from Placer.ai**, capturing seasonal visitation patterns and place of origin.
- **Short-term rental (STR) data from AirDNA**, detailing property location, nightly rates, availability, and occupancy trends.

- **Hotel data from Smith Travel Research (STR Global or Smith Travel Data)**, providing aggregated information on hotel types, occupancy rates, and average daily rates for both inland and coastal areas.
- **Parcel-level assessor data from the Monterey County Assessor**, used to classify property ownership, residency status, and land value.
- **Affordability metrics from the California Coastal Act**, applying the Lower-Cost Coastal Accommodation (LCCA) standard developed by the State Coastal Conservancy.
- **Visitor survey results from the Monterey County Visitor Profile Final Report (2016)**, supplemented by more recent data from the Monterey County Visitor's Bureau, offering insight into visitor behavior and lodging preferences.
- **Tourism statistics from Monterey County, Visit California, and SeeMonterey**, estimating total overnight visitation.

The report analyzes these data across multiple spatial scales, including the Coastal Zone, one-mile coastal proximity corridor, incorporated and unincorporated areas, and county planning areas. This disaggregation allows for a geographically nuanced understanding of both STR supply and visitor demand in relation to public coastal access.

1.3 Structure of the Report

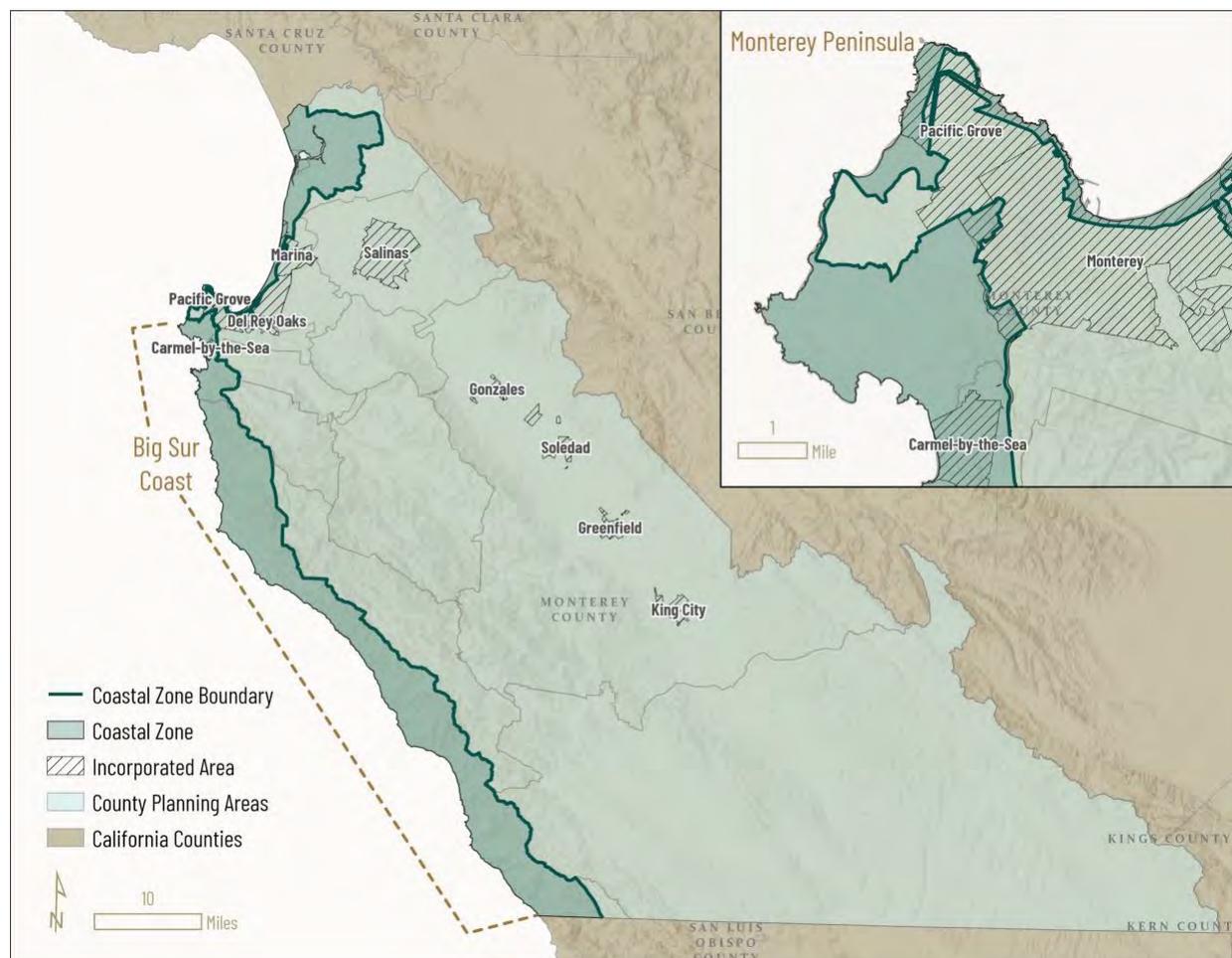
Following this introduction, the report is organized into seven sections:

- **Section 2: The Monterey County Coastal Zone and Planning Areas**
Provides an overview of key geographies in Monterey County, including definitions and boundaries for the Coastal Zone and relevant planning areas.
- **Section 3: Market Demand**
Quantifies overnight visitor demand using cell phone-derived mobility data, visitor profiles, and seasonal travel behavior.
- **Section 4: Supply and Affordability**
Compares short-term rentals (STRs) and hotels in terms of geographic distribution, seasonal availability, guest capacity, and affordability.
- **Section 5: Housing Market Context and STR Impacts**
Evaluates how STRs intersect with the local housing market, including patterns of ownership, residency, and property valuation.
- **Section 6: Monterey County Policy Jurisdiction**
Clarifies jurisdictional boundaries and assesses the County's authority over STR regulation within unincorporated and Coastal Zone areas.
- **Section 7: Recommendations**
Outlines actionable policy recommendations for Monterey County that support affordable access and align with the goals of the California Coastal Act.

2. The Monterey County Coastal Zone & Planning Areas

This enactment of the California Coastal Act in 1976 permanently established the California Coastal Commission (CCC) and directed local jurisdictions to adopt Local Coastal Programs (LCPs) that guide development within the designated Coastal Zone. Among the “basic goals of the state for the Coastal Zone” is “Maximize public access to and along the coast and maximize public recreational opportunities in the Coastal Zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners” (Public Resources Code, section 30001.5, subdivision (c)).

While the Coastal Zone is generally defined as the area extending inland 1,000 yards from the mean high tide line, the Coastal Act allows for adjustments where necessary to protect valuable coastal resources, public access, or scenic views. Map 1 shows the Monterey County Coastal Zone boundary.



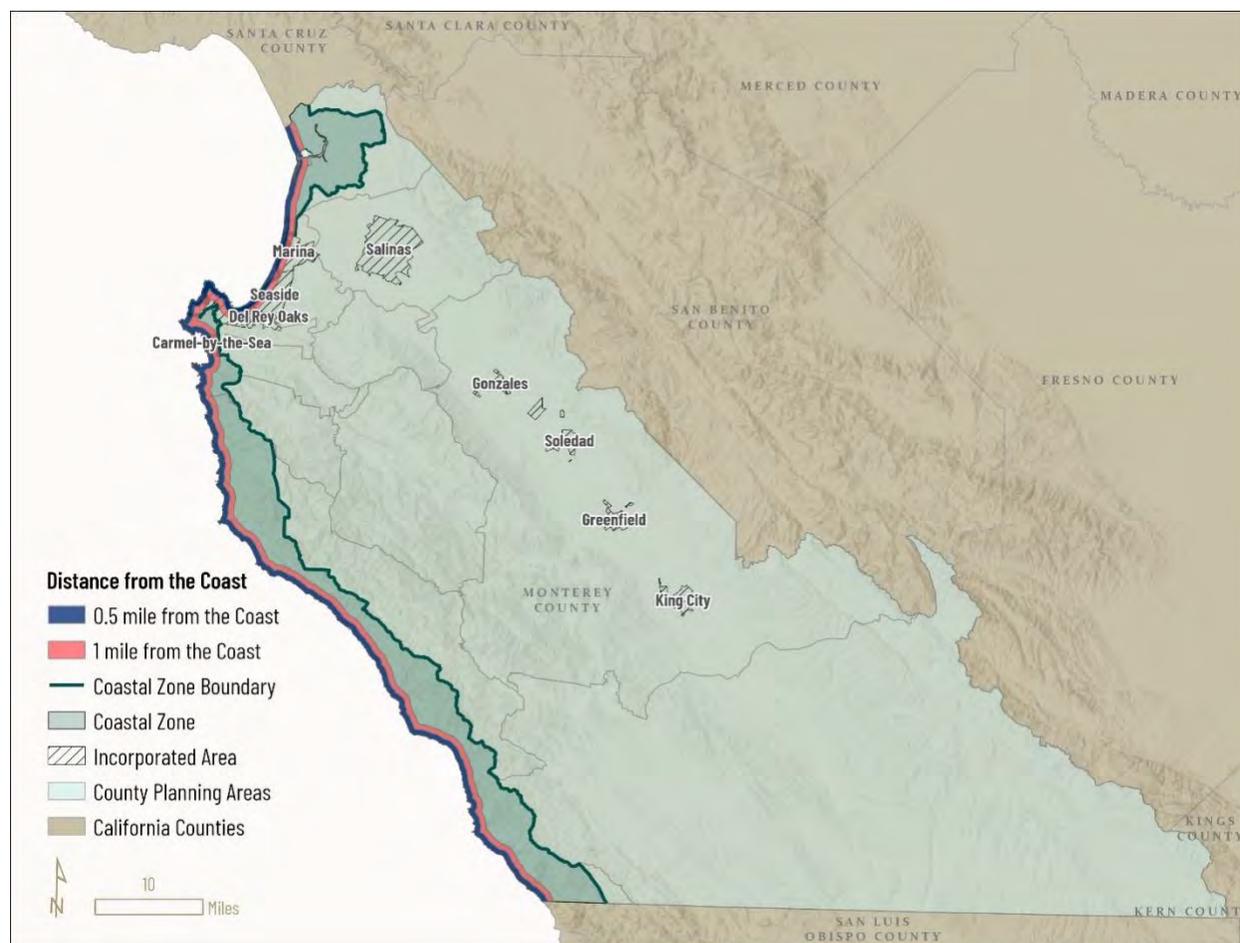
Map 1: California Coastal Zone Boundary in Monterey County.

This map illustrates the officially designated Coastal Zone boundary as defined under the California Coastal Act of 1976.

The Monterey County Coastal Zone boundary’s irregularities illustrate how these boundaries can vary significantly. Along the Big Sur coast, the boundary extends several miles inland to encompass entire watersheds, critical habitats, and scenic viewsheds. In contrast, areas like the Monterey Peninsula, with a higher degree of urbanization, have a Coastal Zone boundary much closer to the shoreline. The variation in

the Coastal Zone boundary impacts land use planning and proposed regulations, including short-term rental operations.

While the official Coastal Zone boundary connotes specific regulatory requirements, the irregularities make the Monterey County Coastal Zone a poor proxy for coastal access. Therefore, this report also uses two “coastal proximity corridors” extending inland from the shoreline at 0.5-mile and 1-mile intervals, shown in Map 2 below. These allow for a comparative analysis of how the density of overnight accommodations, particularly STRs, relates to visitor access to the coast. The corridors are not regulatory boundaries but rather are intended to help decision makers understand how the location of hotels and STRs varies within walkable or easily drivable distances to the shoreline. Notably, along portions of the Monterey coast, especially the Monterey Peninsula, the designated Coastal Zone boundary does not overlap with these corridors. For this report, areas within the official Coastal Zone and any remaining areas within the 1-mile proximity corridor create the “coastal area.”



Map 2: Coastal Proximity Corridors and Coastal Zone Boundary in Monterey County.

The map shows two proximity corridors extending 0.5-mile and 1-mile inland from the Monterey County coastline, alongside the designated California Coastal Zone boundary.

3. Market Demand: Visitor Profile and Lodging Need

Understanding visitor demand is essential to evaluating the market for overnight accommodations.

This section examines the demand side of the market using two complementary data sources: (1) the 2016 *Monterey County Visitor Profile Final Report of Findings*, produced by the Monterey County Convention and Visitors Bureau, and (2) anonymized, cell phone-derived location data provided by Placer.ai for the period 2018 through 2024, excluding the year 2020.

Placer.ai aggregates anonymized location data from a large panel of mobile devices to estimate real-world visitation patterns. These data allow for detailed analysis of where visitors go, how long they stay, and where they originate, all without collecting any personally identifiable information. For this project, custom polygons were digitized to capture visitor activity along the Monterey County coastline, including the scenic drive and beach access areas along the Big Sur coast. These polygons were used to spatially analyze trends in visitation volume, travel distance, seasonality, and distribution across coastal subregions.

The year 2020 was excluded from all analyses due to the atypical travel behaviors and significant reductions in visitation associated with the COVID-19 pandemic. Removing this anomalous year provides a more accurate representation of both baseline and recent visitation patterns.

Together, the Placer.ai data and the 2016 Visitor Profile survey provide a well-rounded picture of tourism in the region. This combination offers valuable insight into visitor demographics, trip characteristics, and the scale of demand for overnight lodging, including the proportion of visitors likely to require accommodations and the intensity of visitation in key coastal areas.

The 2016 *Monterey County Visitor Profile* aimed to develop a comprehensive understanding of Monterey County's visitors, including their motivations, trip characteristics, and experiences. The report relied on a lodging guest survey conducted at 28 properties and intercept surveys administered at popular visitor locations. The study excluded residents and focused on tourism.

Key findings from the report include:

Only 31% of visitors were day trippers (those not staying overnight), even though many originated from Northern California. Larger travel parties, particularly families, were more likely to stay overnight. Overnight visitors stayed an average of 2.7 nights. "Scenic beauty" was the primary driver for visitation, cited by 66.4%, or two-thirds of respondents, yet only 20% of visitors reported traveling to Big Sur.

This report integrates findings from the 2016 *Monterey County Visitor Profile* with an analysis of anonymized cell phone location data provided by Placer.ai. The analysis examines visitor demand along the Monterey County coast, focusing on three subregions: Southern Monterey Bay, the Monterey Peninsula, and the Big Sur/Highway 1 corridor.

As shown in Figure 1, visitor data, provided by Placer.ai, from 2018 to 2024 (excluding 2020 due to anomalous pandemic-related travel patterns) indicate the following:

- More than eight million people visit Monterey County's *coastal areas* annually.

- Summer is the peak season, with visitation highest in July, with visits exceeding one million in that month alone. Demand is especially strong on weekends, reinforcing the need for short-stay accommodations.
- Families represent 63% of all visitor groups. Many of these households require overnight lodging that accommodates multiple guests or rooms.

Together, these data sources provide a robust foundation for assessing current visitation patterns and the associated need for overnight accommodations.

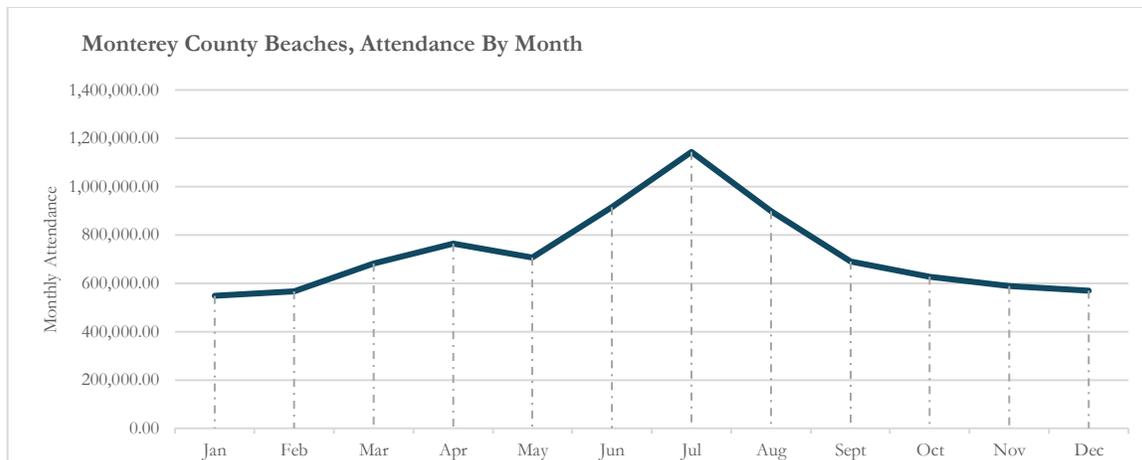


Figure 1: Monthly visitation to Monterey County's coastal areas based on anonymized cell phone location data (Placer.ai, 2018–2024, excluding 2020).

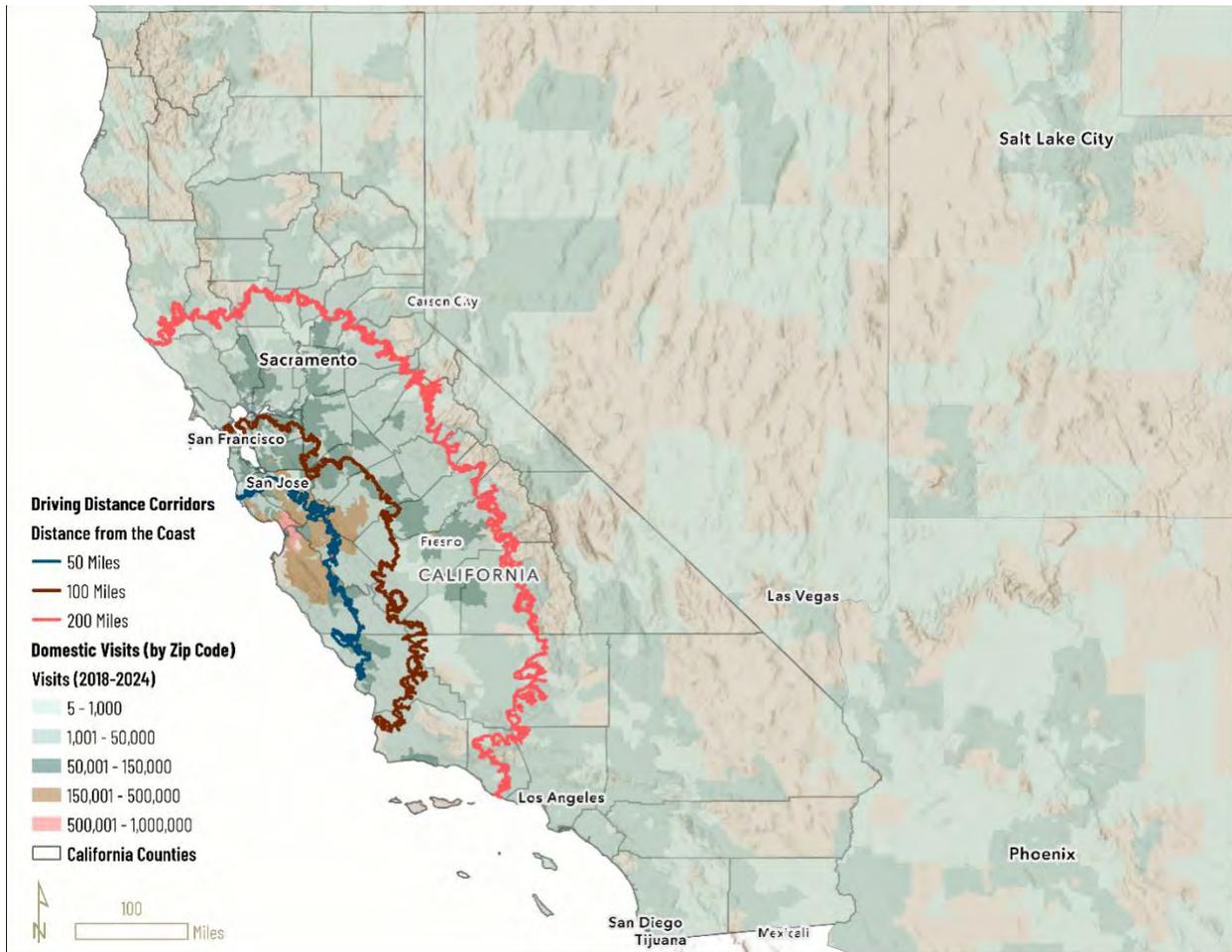
The data illustrate strong seasonality, with peak visitation occurring in July and elevated weekend demand throughout the year.

3.1 Overnight Visitors & Accommodation Demand

The total number of overnight visitors to Monterey County is a key indicator of demand for accommodations and serves as a foundational metric for this market analysis. Estimates of overnight visitation vary across sources due to differences in methodology, geographic scope, and reporting periods. The *2016 Monterey County Visitor Profile* states that approximately 69% of all visitors stay overnight, which corresponds to an estimated 5.7 million overnight visitors annually. Both *See Monterey* and *Visit California* report approximately 4.6 million annual overnight visitors, while Monterey County's website advertises "over 3 million" overnight visitors each year. Cell phone derived visitation data from Placer.ai provide an additional estimate based on visitor travel distance. For this analysis, individuals traveling fewer than 100 miles are assumed to be day-trippers, those traveling more than 250 miles are considered overnight visitors, and those traveling between 100 and 250 miles are assumed to split evenly between day and overnight stays. Based on these assumptions, Placer.ai data indicate that approximately 37% of coastal visitors, or roughly 3.1 million individuals annually, would likely stay overnight.

To reconcile these differing estimates, this report averages the five figures, resulting in an approximation of 4.2 million overnight visitors per year. Applying the average stay length of 2.7 nights from the 2016 Visitor Profile results in an estimated 11.3 million overnight stays annually. While distance-based methods assume

that visitors from within 100 miles are day-trippers, the 2016 Visitor Profile shows that many Bay Area residents, including 17.5% from San Francisco and 16.6% from San Jose, choose to stay overnight.



Map 3: Driving Distance and Domestic Visitation to Monterey County's Coast, 2018–2024.

This map illustrates estimated domestic visitation to the Monterey County coastline by zip code, overlaid with 50-, 100-, and 200-mile driving distance corridors. The driving distance bands are used to evaluate proximity-based travel behavior and inform lodging needs.

3.2 A Tourism-Based Market

Tourism, vacation, and leisure are the primary drivers of visitation to Monterey County. The 2016 *County Visitor Profile*, produced by the Monterey County Convention and Visitors Bureau² indicates that relatively few travelers visit the region for business purposes. Only 3.9% of respondents identified their primary trip purpose as “business,” 3.8% as “convention or meeting,” and 0.5% as “government or military,” resulting in a combined total of just 8.2% of visitors traveling for business-related reasons. This contrasts sharply with national trends, where business travelers account for approximately 40% of hotel stays³, and non-business

² *Monterey County Visitor Profile: Final Report of Findings, 2016.* Destination Analysts, https://assets.simpleviewinc.com/simpleview/image/upload/v1/clients/montereycounty/Monterey_County_Visitor_Profile_2016_Final_Report_of_Findings_26af80ed-36b8-4570-845c-bfac665e0349.pdf.

³ “Business Travel Statistics: The Ultimate List.” *Stratos Jet Charters*, <https://www.stratosjets.com/blog/business-travel-statistics/#:~:text=These%20travelers%20make%20up%2040,10>.

conventions and events constitute a significant share of overnight demand.⁴ Overall, business, convention, and government-related travel plays a much smaller role in Monterey County's lodging market than in other regions.

While scenic beauty is cited by 66.4% of respondents as a primary reason for visiting Monterey County, coastal recreation is not the only activity of interest. Only 33% of respondents indicated participation in "outdoor recreation" or visiting "state parks," suggesting that a substantial portion of visitors are drawn by other leisure amenities such as dining, arts, and culture.

Many visits occur over weekends. The *2016 Visitor Profile* notes that 33.4% of respondents were on "weekend getaways," a finding corroborated by daily cell phone-derived visitation data from Placer.ai, which show elevated coastal visitation rates on Fridays through Sundays during the period 2018 through 2024.

This weekend-centric demand pattern presents unique challenges for the hotel market. Industry research suggests that hotels typically require occupancy rates above 30% to remain viable in the short term, and rates above 50% to remain profitable over the long term. In many tourism markets, this volatility is buffered by consistent weekday demand from business travelers. However, as noted, Monterey County's limited business and convention traffic leaves hoteliers more exposed to fluctuations in weekend leisure travel. In contrast, short-term rentals may be better suited to this uneven pattern of demand, as they do not rely on consistent daily bookings to the same extent and may be operated more flexibly by individual hosts.

3.3 Hotel Demand

This report uses industry standard data purchased from Smith Travel Research (<https://str.com/>) to assess trends in the hotel and motel market across Monterey County. Smith Travel Research provides proprietary information widely used in the hospitality sector, including detailed metrics on hotel occupancy and average daily rates (ADRs).

The STR data for Monterey County hotels, both coastal and inland, reveal significant seasonality in hotel occupancy. Occupancy rates peak in summer months, especially in July, and decline in the winter. Figure 2 compares occupancy rates for hotels located inside the Coastal Zone with those outside. During peak summer months, such as July, coastal hotel occupancy rates approach 90%. In contrast, January occupancy rates fall below 50%. Across the year, occupancy rates average close to 70% in the Coastal Zone and 65% in non-coastal areas.

⁴ "Business Travel: Revealing New Stay Trends." *Booking.com for Business*, <https://business.booking.com/en-us/business-travel-resources/articles/business-travel-revealing-new-stay-trends/>.

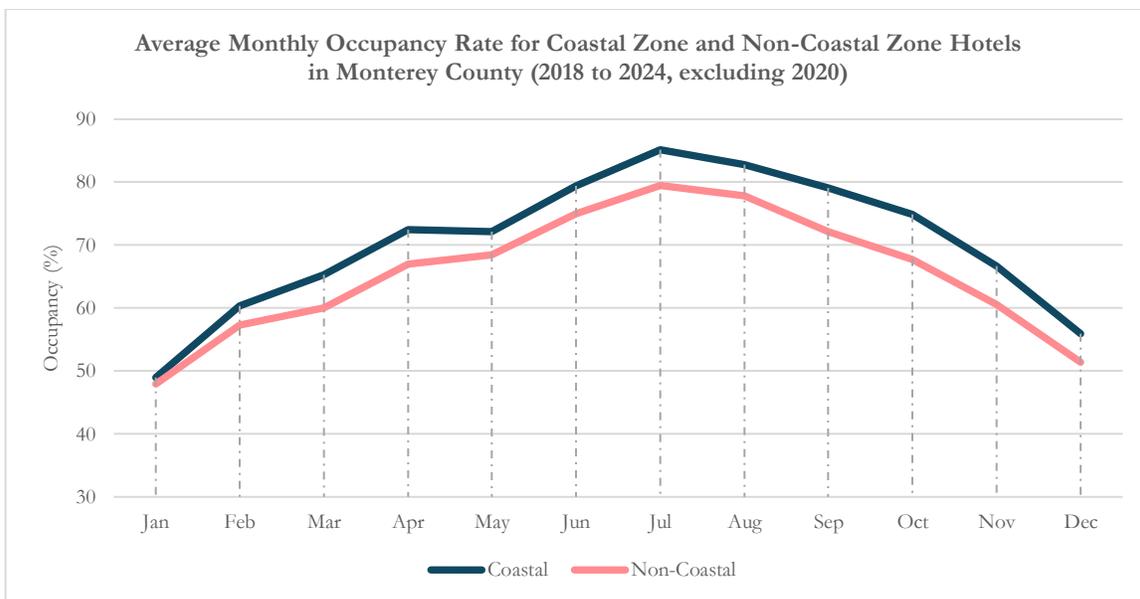


Figure 2. Average Monthly Occupancy Rate for Coastal Zone and Non-Coastal Zone Hotels in Monterey County (2018 to 2024, excluding 2020)

These occupancy levels compare favorably to national hotel trends. In 2024, the national average occupancy rate was 62.9%⁵. Industry analysts generally consider a 60% to 70% occupancy rate indicative of a healthy hotel market.⁶ The highest national hotel occupancy rate recorded in the United States was 66.2% in 2018. Numerous economic studies of the hotel market in the United States indicate that an occupancy rate of approximately 65% is considered “standard” in the industry⁷, and occupancy rates are often lower in other countries⁸. In this context, Monterey County’s 60% to 70% occupancy, driven almost entirely by leisure and tourism rather than business travel, is particularly strong. Popular attractions such as Cannery Row, the Monterey Bay Aquarium, and coastal recreation sites, along with seasonal events like the Monterey Car Week, contribute to this high level of tourism-driven demand.⁹ Despite the Visitor Profile indicating that beach recreation is not the primary activity for many visitors (see Section 3.2), STR data show that hotels located

⁵ See Beyond Recovery: 2024 State of the Industry Report, The American Hotel and Lodging Association https://www.ahla.com/sites/default/files/SOTI.2024.Final_.Draft_.v4.pdf.

⁶ Occupancy Rate. (2025) *Hotel Occupancy Rate Calculator - what is occupancy rate*. Canary Technologies. <https://www.canarytechnologies.com/hotel-terminology/occupancy-rate#:~:text=A%20good%20occupancy%20rate%20for%20a%20hotel%20can%20vary%20depending,%2D90%25%20is%20consider%20excellent> (last visited Apr 9, 2025).

⁷ See Slattery, P., 2009. The Otus theory of hotel demand and supply. *International Journal of Hospitality Management*, 28(1), pp.113-120, CBRE, *Market Demand Analysis: Proposed 392 room resort hotel to be located in the San Canyon Country Club, Santa Clarita, CA.*; Hotel Occupancy Rate Calculator - what is occupancy rate, Occupancy Rate (2025), <https://www.canarytechnologies.com/hotel-terminology/occupancy-rate#:~:text=A%20good%20occupancy%20rate%20for%20a%20hotel%20can%20vary%20depending,%2D90%25%20is%20consider%20excellent> (last visited Apr 9, 2025).

⁸ See Slattery, P., 2009. The Otus theory of hotel demand and supply. *International Journal of Hospitality Management*, 28(1), pp.113-120, <https://www.seemonterey.com/events/sporting/concours/#:~:text=Friday%2C%20August%202017%2C%202025&text=Highlights%20include%20prestigious%20car%20shows,auctions%20like%20RM%20Sotheby's%20Auction>.

⁹ Monterey County Convention & Visitors Bureau. (2025). *Concours events in Monterey County*. SeeMonterey. <https://www.seemonterey.com/events/sporting/concours/>

within the Coastal Zone consistently experience significantly higher demand than those farther inland. Figure 3 illustrates that average monthly hotel room demand in the Coastal Zone is nearly four times greater than in non-coastal areas. Seasonal peaks align with the summer travel period, especially July. This demand is further influenced by the geographic distribution of hotel supply: 76% of all hotel rooms in Monterey County are located within the Coastal Zone.

This concentration of demand and supply along the coast underscores the hotel market's dependence on seasonal tourism and its vulnerability to pricing pressures. The high cost of lodging in coastal areas may limit access for visitors with moderate incomes, particularly families or groups seeking amenities such as kitchens. Addressing this imbalance will require consideration of how to increase capacity, improve affordability, and expand the range of lodging options that meet visitor needs across all income levels.

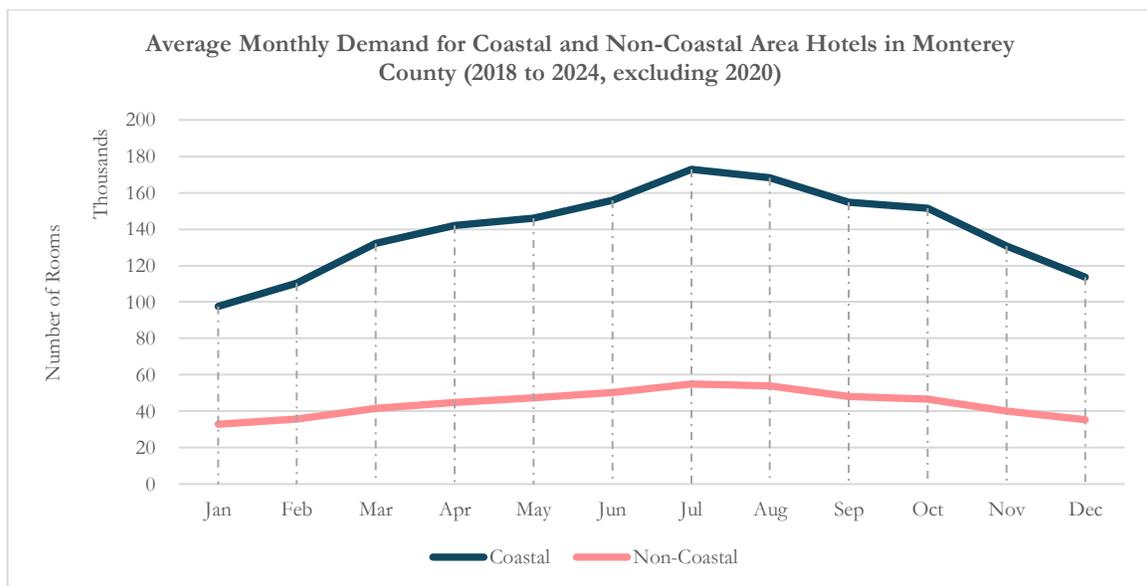


Figure 3: Comparing Average Monthly Demand for Coastal and Non-Coastal Area Hotels in Monterey County (2018 to 2024, excluding 2020)

3.4 Demand for STRs in Monterey County

According to the AirDNA data, demand for STRs in Monterey County, both coastal and inland, shows similar “seasonality” to the demand for hotels, with higher occupancy during summer months, especially July. Unlike hotels, the occupancy rate is slightly higher for *inland* properties likely due to lower nightly rates. Figure 4 shows the average monthly occupancy rate for all available STRs. Occupancy for all STRs peaks significantly in July at 73%. Compared to hotels, however, the supply of STRs is less strained. There is higher hotel room occupancy compared to STRs throughout the year, although it’s worth noting that there is twice as much available STR capacity. Finally, STR occupancy rates experience a more extreme increase in demand during the summer, compared to hotel rooms. Compared to the hotel market, which is strained and near capacity in the summer months, the STR market appears to be healthy.

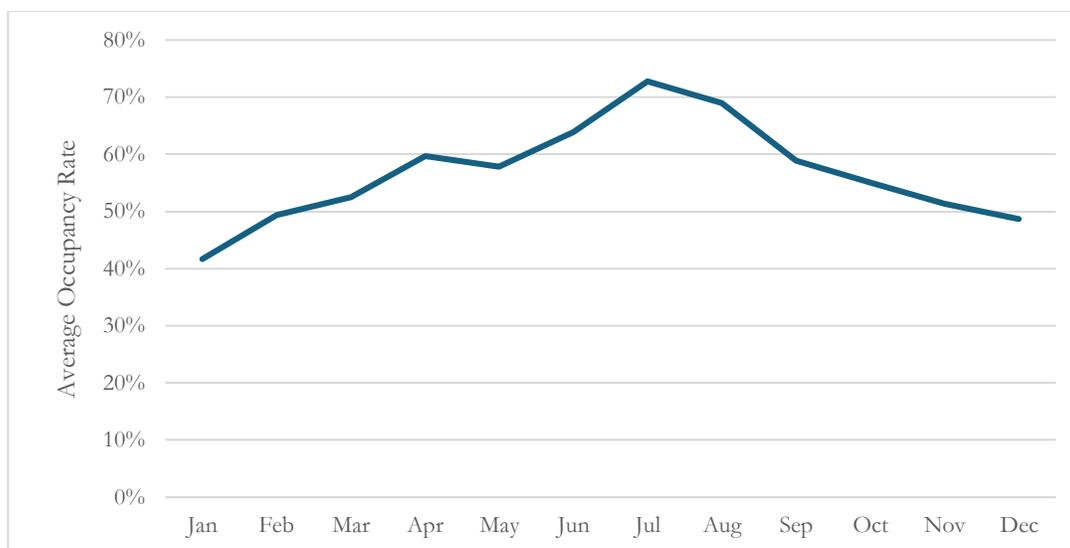


Figure 4: Average STR Occupancy Rate

An analysis of monthly occupancy rates from AirDNA shows that visitors to Monterey County consistently prefer unhosted short-term rentals (STRs) over hosted ones. Unhosted STRs refer to entire units where guests have full privacy, such as whole homes or apartments. Hosted STRs, by contrast, include shared accommodations where the host is present, typically in a private room.

Despite there being fewer hosted STRs in Monterey County, these properties exhibit lower occupancy rates and are underutilized. From 2018 to 2024 (excluding 2020), unhosted STRs consistently achieved higher occupancy rates than hosted STRs, a trend particularly evident during peak summer months such as July and August, as shown in Figure 5. Countywide, unhosted STRs maintain an average annual occupancy rate of 48%, compared to 45% for hosted STRs. During the peak season, unhosted STRs reach 62% occupancy, while hosted STRs reach only 56%.

It is important to note that these occupancy figures, derived from AirDNA data, likely underreport actual occupancy. AirDNA calculates occupancy based on the proportion of days a listed property is booked in a given month. If a property is not listed for the entire month, it is treated as having 0% occupancy, even if it was not available to book. As a result, properties with irregular listing activity may artificially lower the average. Adjusting for this issue increases the effective occupancy rates for both hosted and unhosted STRs.

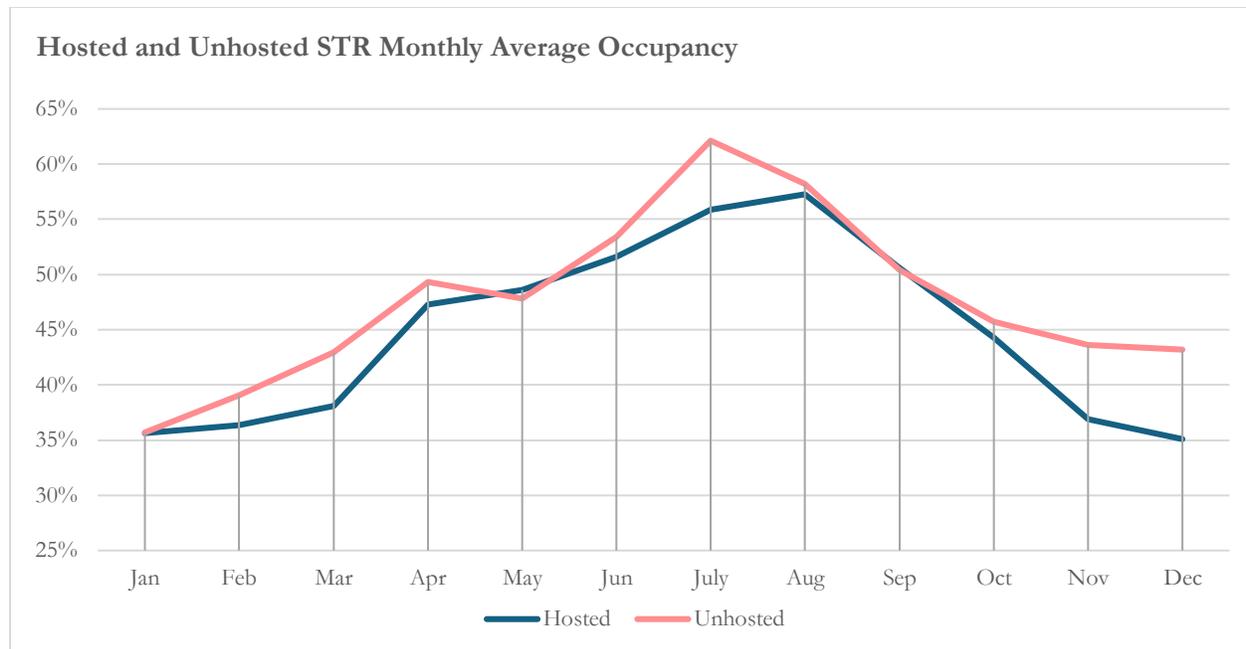


Figure 5: Hosted and Unhosted STR Monthly Average Occupancy

These patterns reflect strong visitor preferences for privacy and flexibility in lodging accommodations. They also reinforce findings from the *2016 Monterey County Visitor Profile* and the cell phone-derived visitation data from Placer.ai, both of which highlight tourism, not business travel, as the primary driver of demand in the region.

In summary, Monterey County supports robust occupancy levels in both the hotel and STR sectors. Hotels exceed national industry benchmarks during the summer, and STRs demonstrate similarly strong seasonal and weekend demand. This suggests that STRs play a meaningful and complementary role in meeting accommodation needs, particularly in areas where traditional hotel options are limited or cost prohibitive.

3.5. Coastal Access Equity

The California Coastal Act includes provisions for ensuring maximum public access to the coast, and both the California Coastal Commission (CCC) and the State Coastal Conservancy have emphasized the importance of promoting coastal access equity. This principle refers to the ability of individuals from all backgrounds, including disadvantaged and vulnerable communities, to enjoy California's coastal resources.

Analysis of cell phone-derived visitation data from Placer.ai indicates that the demographic composition of visitors to Monterey County's coastal areas closely reflects the population of California as a whole. As shown in Table 1, Hispanic visitors are represented in proportions nearly identical to the statewide average. While Asian and African American visitors are somewhat underrepresented and white visitors are slightly overrepresented, the overall distribution suggests broad demographic access to the coast.

Table 1: Visitor Demographics for Monterey County Coastal Areas

Ethnicity (Census 2020)	Hispanic	White	Asian	Black	Other or Mixed
Monterey County Captured Visitors	40.7%	44.3%	7.4%	2.8%	4.8%
California Overall	39.4%	34.7%	15.1%	5.4%	5.4%

In addition to racial and ethnic representation, income levels among visitors are comparable to the broader California population. As shown in Table 2, the median household income of coastal visitors to Monterey County is nearly identical to that of California residents, while the average household income is slightly lower. These data suggest that coastal access in the region is not limited to high-income households and that a wide range of income groups are able to visit.

Table 2: Monterey County Coastal Areas Visitor Incomes Compared to California Average

Household Income (Census 2020)	Median	Average
Monterey County Captured Visitors	\$79,010	\$105,299
California Overall	\$78,672	\$111,622

4. Supply and Affordability: Hotels and STRs in Monterey County

Following the analysis of visitor demand, this section evaluates the supply of overnight accommodations in Monterey County using data from Smith Travel Research (STR Global or Smith Travel Data) for hotels and AirDNA for short-term rentals (STRs). These complementary datasets provide detailed information on room counts, geographic distribution, pricing, and guest capacity. The findings indicate a consistent mismatch between the volume of overnight visitors and the supply of hotel rooms, particularly during peak travel periods such as weekends and summer months. This suggests that hotel capacity alone is insufficient to meet demand. In contrast, STRs offer a broader range of lodging options, often at lower per-person costs, and provide additional flexibility for families and groups through features like kitchens and multi-room accommodations.

4.1 Supply of Monterey County Hotels

Overnight visitor demand for Monterey County's coastal areas exceeds the available hotel capacity, particularly on weekends and during the peak summer season. Figure 6 illustrates this shortfall by comparing estimated coastal lodging demand to the coastal hotel supply. The orange line reflects the total hotel capacity allocated to coastal-serving visitors based on hotel located in coastal communities (excluding Salinas and those along highway 101 further inland), while the green line shows estimated daily overnight demand for coastal access based on anonymized cell phone location data from 2018 to 2024 (excluding 2020 and 2021). According to the Monterey County Visitor Profile, approximately 66% of overnight visitors access the coast, as reflected in cell phone-derived visitation data from Placer.ai. Demand estimates based on coastal cell phone data were adjusted to account for the remaining 33% of visitors who do not enter the monitored Coastal Zones. As noted in the Monterey County Visitor Profile, demand surges notably on weekends and peaks in late summer, with Labor Day weekend showing the highest spike.

This pattern reveals a persistent gap between coastal visitor demand and hotel availability, especially during high-demand periods. Countywide, the data indicate an excess demand of 31,880 annual visitors, or over

12,000 hotel rooms. These findings underscore the critical role of short-term rentals in helping to meet overall lodging needs, particularly during periods when hotel capacity falls short.

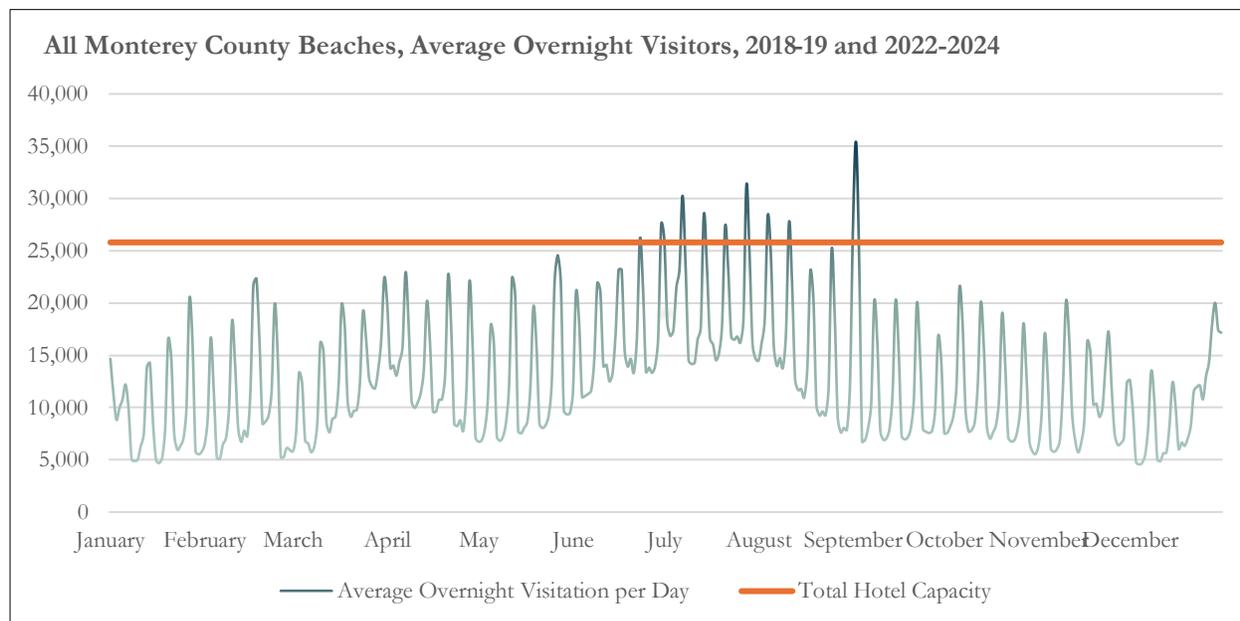


Figure 6: Estimated Overnight Visitation to Coastal Areas of Monterey County Compared to Coastal Hotel Capacity (2018–2024, excluding 2020).

The teal line represents average daily overnight visitation to coastal areas of Monterey County, as estimated using anonymized cell phone-derived location data. The coral line shows the estimated coastal community hotel capacity, assuming an average 2.6 guests per room. The figure highlights consistent weekend and seasonal demand peaks that often exceed available hotel supply.

4.1.1 Hotel Market Composition

Data from Smith Travel Research indicate that the hotel market in Monterey County has rebounded since the COVID-19 pandemic disruption in 2020, with occupancy rates consistently exceeding 60%. Table 3 summarizes the distribution of hotel rooms by market class from 2019 to 2024. Monterey County currently offers approximately 12,800 hotel rooms. Nearly half (44%) fall into the “Luxury” or “Upper Upscale” categories. In contrast, only 29% of rooms are classified as “Economy,” a segment that has shrunk by 6% since 2019.

Table 3: Distribution of Monterey County Hotel Rooms by Market Class, 2019–2024. This table presents the number and percentage share of hotel rooms across six standard market categories, along with the change in room count and percent change over the study period.

Hotel Class	Number of Rooms	Percentage of the Total Rooms	Change in Number of Rooms	Percentage Gain/Loss in Rooms
Economy	3,676	29%	-212	-6%
Midscale	1,636	13%	28	2%

Upper Midscale	1,978	15%	531	27%
Upscale	1,034	8%	2	0%
Upper Upscale	1,795	14%	-50	-3%
Luxury	2,755	21%	490	18%
All Classes	12,874	100%	789	9%

The data reflect a clear shift in hotel investment away from lower-cost accommodations and toward higher-end properties. Since 2019, Monterey County has seen a net reduction of 212 economy hotel rooms, while upper midscale and luxury room categories have grown by 531 and 490 rooms, respectively. This trend aligns with the economic “survivor test” introduced by Nobel laureate George Stigler, which suggests that market segments experiencing expansion are typically more profitable and attractive for future investment. Applying this framework, it appears that economy hotels may no longer be considered viable investments in the county, while upper midscale and luxury hotels are gaining ground.

A concurrent geographic shift has occurred in hotel development. As shown in Table 4, hotel room supply within the Coastal Zone has increased by 5% since 2018, while inland room supply has declined by 9.2%. The overall market grew slightly (1.2%), suggesting that coastal hotel development has offset inland losses. The distribution of hotel types further underscores this shift: 79% of luxury rooms and 76% of upper midscale rooms are in the Coastal Zone, while 87% of economy rooms are located inland.

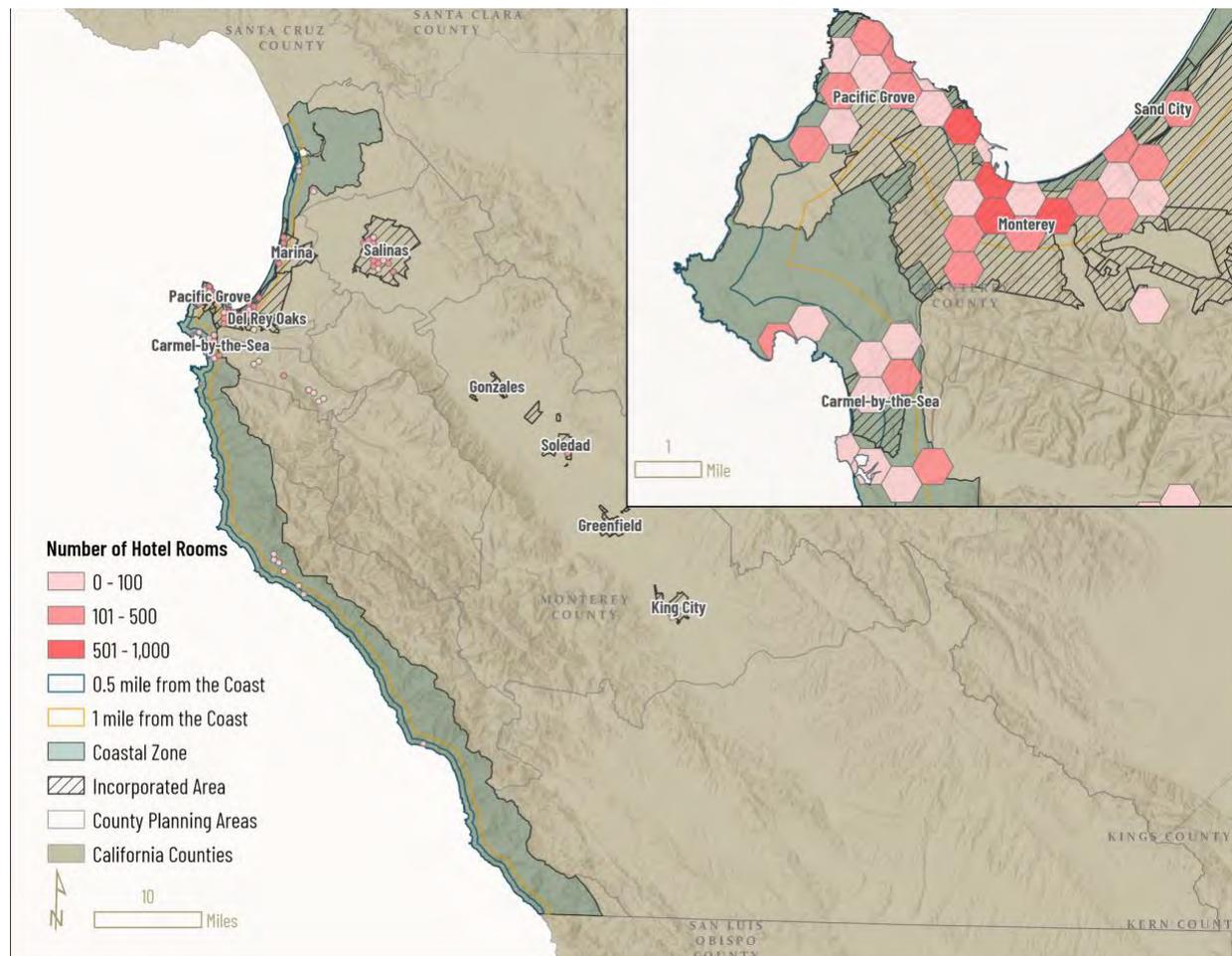
The data suggest that the economy hotel sector in Monterey County is facing increasing pressure, with further closures likely. These lower-cost properties are increasingly being replaced by upper midscale and luxury accommodations, which typically offer fewer beds per room and come with higher ancillary expenses such as restaurant dining, parking fees, and resort charges. This transition reduces the availability of affordable options, particularly for families and groups who rely on budget lodging with features like kitchen access.

Table 4: Comparing Coastal and Inland Monterey County Hotels Supply and ADRs, 2019-2024

Location	Number of Rooms (2024)	2024 ADR	2024 ADR Per Person	2024 Avg Occupancy	Percent Change in Room Supply since 2017
Coastal	9,923	\$ 342.00	\$ 132.00	69.5	5.0%
Non-Coastal	2,951	\$ 233.00	\$ 90.00	64.7	-9.2%
Total Sample	12,874	\$ 316.00	\$ 122.00	68.0	1.2%

Map 4 illustrates the geographic distribution of hotel rooms across Monterey County using a 0.25-mile hexagonal grid. Symbols are color-coded to indicate room density. Coastal cities such as Monterey, Pacific Grove, Carmel-by-the-Sea, and Seaside exhibit the highest concentrations of hotel rooms, while inland areas and the Big Sur coastline have relatively few. The map also depicts the official California Coastal Zone boundary and proximity corridors extending 0.5 and 1 mile inland. Notably, many hotel rooms are located just outside the Coastal Zone, largely due to the boundary’s irregular shape and the concentration of hotel

development in urban centers. This spatial pattern raises equity concerns about the availability of lodging in high-demand coastal areas.



Map 4: Spatial Distribution of Hotel Rooms in Monterey County with Coastal Proximity Indicators.
 This map displays the number of hotel rooms by location using a hexagonal aggregation, with symbols colorized to show total room counts per hexagon. The Coastal Zone boundary and proximity corridors at 0.5 and 1 mile from the coast are shown for reference. Hotel rooms are heavily concentrated in the coastal cities of Monterey, Pacific Grove, Carmel-by-the-Sea, and Seaside, with relatively few inland hotel clusters.

4.2 Supply of STRs in Monterey County

This section analyzes short-term rental (STR) supply in Monterey County using third-party data purchased by Ceto from AirDNA, which covers listings and bookings on Airbnb and VRBO from 2014 through 2025. The primary analysis focuses on the period from 2018 to 2025, excluding 2020 due to the disruptions caused by the COVID-19 pandemic. AirDNA provides detailed property-level and monthly trend data across several variables.

Key attributes assessed in this analysis include:

- **Property location** (e.g., distance from the coast)
- **Property type** (entire home, “hotel” [small B&B], private room, shared room)

- **Average Daily Rate (ADR)**
- **Minimum stay requirements**
- **Guest capacity** (total number of guests and bedrooms)
- **Occupancy rate**

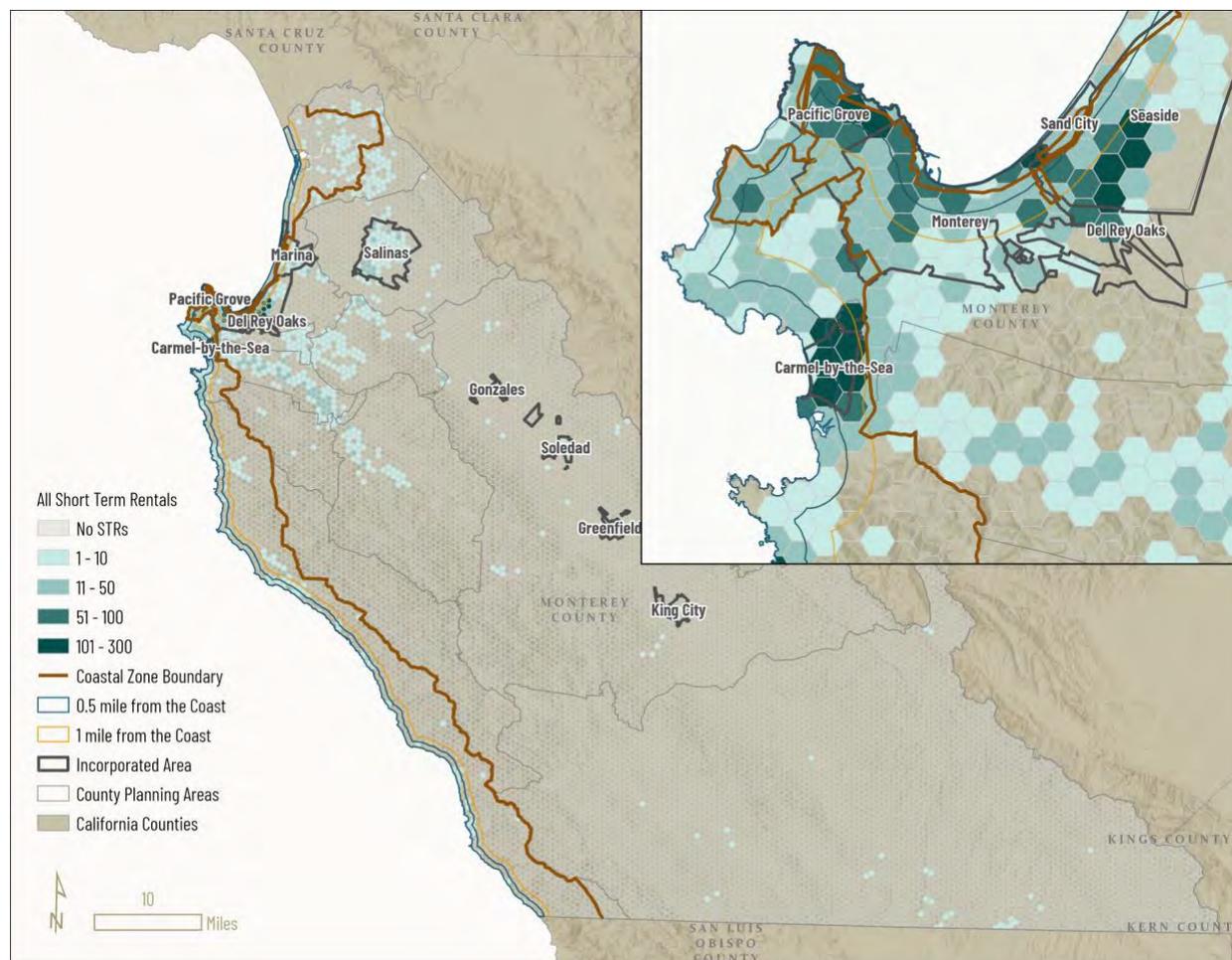
As with hotels, the spatial distribution of STRs shows a strong coastal presence, including within the Coastal Zone. However, STRs exhibit greater inland coverage than hotels. Approximately 40% of STRs are located outside the defined coastal area, compared to just 25% of hotels. While coastal STRs offer closer access to shoreline destinations, inland STRs tend to be more affordable and often lie along key access corridors. Table 5 summarizes the distribution of STRs across coastal and inland areas in Monterey County from 2018 to 2024.

Table 5: Comparing Coastal and Inland STRs in Monterey County, 2018-2024

Listing Location	Number of Rentals	Percent of STRs	Guest Capacity	Average Capacity (Guests)	Percent of Total STR Capacity
Coastal Area	5,349	60%	26,356	4.9	61%
Non-Coastal	3,514	40%	17,146	4.9	39%
Total STRs	8,863	100%	43,502	4.9	100%

As shown in Map 5, inland short-term rentals (STRs) are generally located along major access corridors to the Monterey Peninsula, including Carmel Valley Road and Highway 68. These locations are within a short drive of coastal destinations, assuming unobstructed road access. By contrast, inland hotels tend to be situated farther from the coast than STRs.

Map 5 displays the spatial distribution of STRs across Monterey County, using a 0.25-mile (1,320-foot) hexagonal grid to aggregate listings. The Monterey Peninsula exhibits the highest concentration of STRs, particularly in Monterey and Carmel-by-the-Sea. Outside of these urban areas, STR density is lower and more dispersed, with most grid cells containing fewer than 50 listings and many showing fewer than 10.



Map 5: Short-Term Rental Distribution in Monterey County (0.25 Mile Grid).

This map displays the number of STR properties aggregated within a 0.25-mile (1,320-foot) hexagonal grid across Monterey County. It includes incorporated city boundaries, the official California Coastal Zone boundary, and proximity corridors extending 0.5 mile and 1 mile from the shoreline. STR concentrations are highest on the Monterey Peninsula, with lower-density patterns in inland and rural areas.

4.2.1 STR Market Composition

AirDNA classifies short-term rental (STR) properties by “type,” including categories such as entire home, hotel, private room, and shared room. For this analysis, all listings identified as entire homes or hotels were considered **unhosted rentals**, meaning guests have exclusive use of the property. Listings categorized as private or shared rooms were classified as **hosted rentals**, where the host resides on-site during the guest's stay. AirDNA’s dataset includes listings from both Airbnb and VRBO; however, only Airbnb offers hosted rental options. As such, the “type” classification was used to distinguish between hosted and unhosted listings.

As shown in Table 6, the Monterey County STR market is dominated by unhosted rentals:

- 77% of STR properties are unhosted.
- These listings account for 88% of the county’s total guest capacity.

The coastal area follows a similar pattern. Within the Coastal Zone and areas up to 1 mile from the shoreline, 87% of STRs are unhosted. Within 0.5 mile of the coast, unhosted rentals represent 83% of listings. If unhosted rentals were removed from the market, the county’s total STR guest capacity would fall to approximately 5,400, with only 2,725 remaining in the coastal area.

Map 5 illustrates this distribution, with the highest STR densities occurring on the Monterey Peninsula, particularly in and around the cities of Monterey and Carmel-by-the-Sea.

Table 6: Comparing STR Type (Hosted or Unhosted) for Coastal and Inland Listings.

Type & Location	Number of Rentals	Percent of STRs	Guest Capacity	Average Capacity (Guests)	Percent of Total STR Capacity
Coastal Hosted Rentals	961	11%	2,725	2.88	6%
Coastal Unhosted Rentals	4,388	50%	23,631	5.36	54%
Outside of Coastal Area Hosted Rentals	1,060	12%	2,644	2.50	6%
Outside of Coastal Area Unhosted Rentals	2,454	28%	14,502	5.91	33%
Total STRs	8,863	100%	43,502	4.9	100%

AirDNA also classifies STRs into market tiers—budget, economy, midscale, upscale, and luxury—using a system similar to hotel ratings. Table 7 summarizes the distribution of STRs across these tiers. Countywide, STRs are relatively evenly distributed among the different accommodation classes. However, within the Coastal Zone, 30% of STRs are classified as luxury, making it the dominant category. This trend holds within 0.5 mile of the coastline, where luxury listings account for 26% of all STRs.

In contrast to hotels, STRs provide a greater share of economy and midscale options, especially outside the coastal core, enhancing affordability and increasing choices for cost-conscious travelers and families.

Table 7: STR classifications for all listings, all Coastal Zone listings, and all listings in the proximity corridors (0.5 mile and 1 mile).

Tier	All (% Within Area)	Coastal Zone	0.5 mile	.5- 1 mile
Budget	1,705 (19%)	350 (11%)	398 (13%)	313 (17%)
Economy	1,453 (16%)	382 (11%)	387 (13%)	291(17%)
Midscale	1,419 (16%)	451 (14%)	442 (15%)	280 (16%)
Upscale	1,369 (15%)	608 (18%)	537 (18%)	270 (15%)
Luxury	1,612 (18%)	982 (30%)	772 (25%)	331 (18%)
Undefined	1,305 (15%)	542 (16%)	490 (16%)	306 (17%)
Total	8,863 (100%)	3,315 (100%)	3,026 (100%)	1,791(100%)

Note: The 0.5-mile and 0.5–1.0-mile proximity corridors are mutually exclusive, but the Coastal Zone occasionally overlaps with both. Listings in the Coastal Zone may also fall within either corridor, so counts across these geographies are not mutually exclusive and should not be summed.

While coastal STRs have a higher average daily rate (ADR) due to a higher share of luxury listings, they remain more affordable on a **per-guest basis** because of their larger average capacity. As shown in Table 8:

- Coastal STRs average \$321 per night, or \$81 per guest.
- Coastal hotels average \$342 per night, or \$132 per guest.

The affordability gap is even more pronounced in **non-coastal** areas:

- Non-coastal hotels average \$233 per night, or \$90 per guest.
- Non-coastal STRs average \$245 per night, or only \$56 per guest.

Table 8: Comparing coastal and non-coastal Average Daily Rates (ADRs) for all STRs, including per guest.

Location	2024 ADR	2024 ADR Per Person
Coastal	\$ 321.13	\$ 81.34
Non-Coastal	\$ 245.81	\$ 56.07
Total Sample	\$ 302.30	\$ 75.02

Note: Total sample averages are weighted by the number of STRs in each region to better reflect the contribution of coastal and non-coastal listings.

Unlike hotels, STRs may include minimum stay requirements, often set by local ordinances. For example, Carmel-by-the-Sea and the City of Monterey require minimum stays of 30 days.

As shown in Table 9:

- 59% of STRs allow stays of 0 to 2 nights
- 27% require stays longer than one week
- Of those requiring 8+ night stays, 97% are located outside the official Coastal Zone boundary

Table 9: Short-Term Rental Minimum Stay Requirements by Coastal Zone Location in Monterey County.

Minimum Stay Duration	Number of Total Properties	Number of Properties in the Coastal Zone	Percent in the Coastal Zone	Number of Inland Properties	Percent Inland Properties
0-2 night minimum	5,237	1,660	32%	3,577	68%
3-7 night minimum	1,711	895	52%	816	48%
8+ night minimum	1,915	60	3%	1,855	97%
Total Properties	8,863	2,615		6,248	

Minimum stay requirements can limit weekend visitation and increase travel costs. For example, a \$300 per night listing might be feasible for a two-night stay but unaffordable as a month-long rental. These policies disproportionately impact lower-income visitors who rely on short, affordable getaways and often have limited flexibility in their work schedules. Recent studies show that lower-income workers continue to have fewer remote work options since the COVID-19 pandemic.

4.3 Supply of Hotels Compared to STRs

The analysis presented in Section 4.2, Supply of STRs in Monterey County, demonstrates that short-term rentals (STRs) play an essential role in meeting overnight lodging demand. Monterey County's hotel market does not provide sufficient capacity, particularly during peak periods such as summer and weekends. STRs not only increase total lodging availability, but also offer greater flexibility, more affordable options, and accommodations better suited to families and larger groups, especially in areas underserved by traditional hotels, such as Big Sur.

Demand for accommodation in Monterey County exceeds the 33,500-guest capacity of the 12,874 hotel rooms available. STRs provide an estimated additional 18,000 rooms countywide, with a total capacity of up to 43,500 guests based on average listed occupancy. This added capacity is critical for alleviating seasonal shortages, particularly during high-demand periods and in coastal regions where hotel supply is limited.

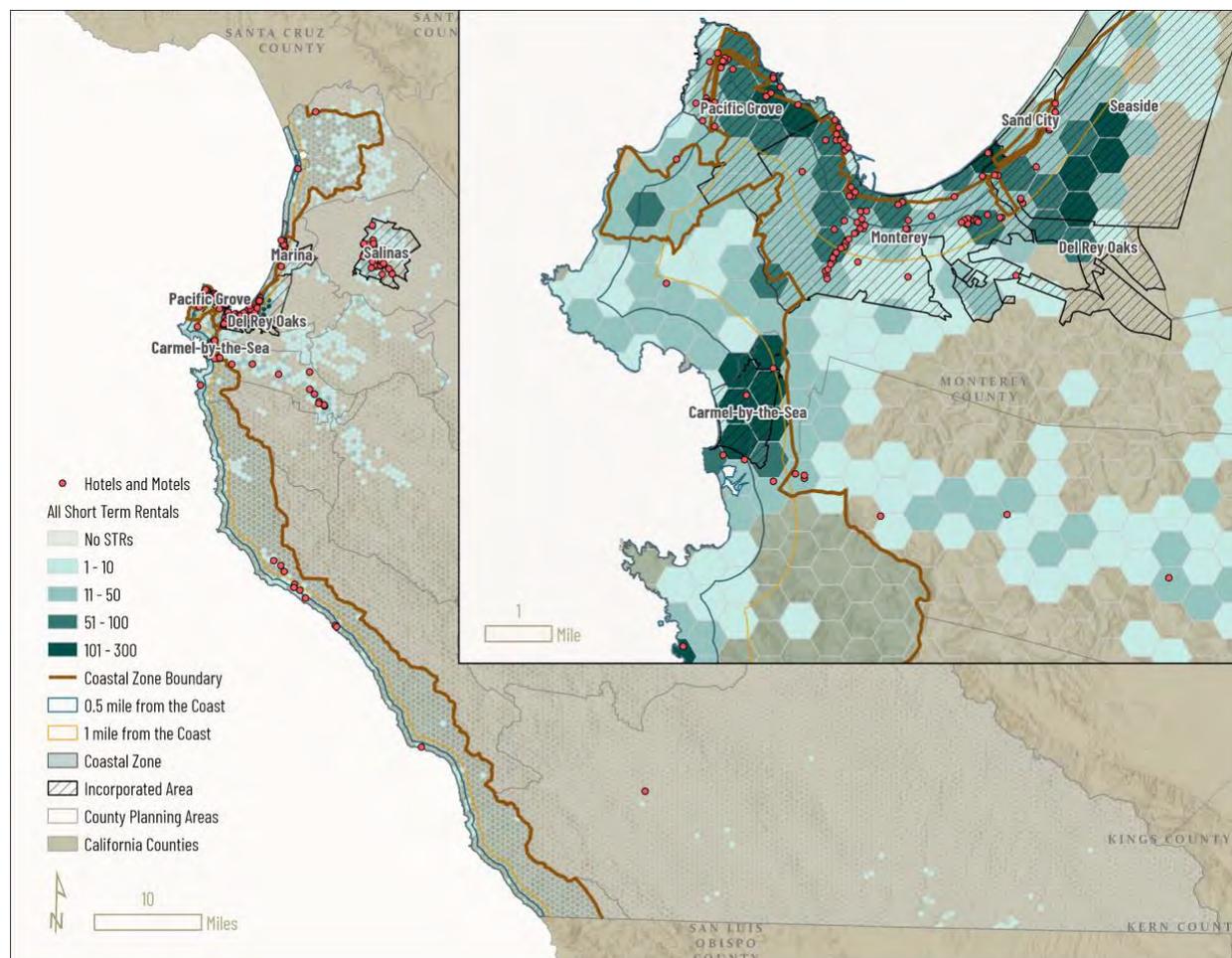
If one examines the demand and supply of overnight accommodations for the entire area under study, there is an excess demand of 31,880 visitors that cannot be met without short-term rentals or other additional overnight accommodation beyond current hotel supply. However, if one examines submarkets in the area, the mismatch between supply and demand is far greater. The Big Sur area is iconic but has few hotel accommodations most of which are quite expensive. Highway 1 closes frequently due to rockslides, mudslides, coastal erosion, etc. Even on a good day the trip from Monterey, which has economy hotels, to Big Sur is 40-minute drive each way. If Monterey County prohibits short-term rentals or imposes prohibitive license fees on those in Coastal Zone, it will impede access for those wishing to visit Big Sur specifically.

Restricting the supply of STRs under current demand conditions would likely worsen affordability challenges. According to basic economic principles, reducing supply while demand remains high drives prices up. STRs have become an increasingly important part of the lodging market because they offer more affordable and

flexible options. This is especially true as the hotel sector continues to shift away from budget and midscale segments toward higher-priced accommodations.

Geospatial analysis further highlights this role. STRs are widely distributed along the Monterey County coastline and often serve areas where hotel development is limited or infeasible. As shown in Map 6, both STRs and hotels are concentrated in urban areas like the Monterey Peninsula. Along the Big Sur corridor, however, STRs represent the primary form of overnight lodging due to development constraints. Many STRs are also located within or adjacent to the California Coastal Zone, supporting access to the coast in areas where hotels are scarce.

These findings suggest that STRs are not simply a supplement to the lodging market. They are essential to meeting baseline visitor demand, particularly in coastal regions that lack traditional accommodations. Rather than adjusting demand estimates downward to reflect only those visitors directly accessing the coast, it may be more accurate to consider coastal visitation as a primary driver of overnight lodging needs throughout the county. This framing reinforces the importance of STRs in supporting continued public access and affordability in alignment with the California Coastal Act.



Map 6: Distribution of Short-Term Rentals and Hotels in Monterey County with Coastal Proximity Indicators.

This map shows the spatial distribution of short-term rental (STR) properties aggregated within a 0.25-mile hexagonal grid, alongside the locations of hotels and motels, the California Coastal Zone boundary, and proximity corridors at 0.5 mile and 1 mile from the shoreline. The map also shows incorporated city boundaries and county planning areas for geographic reference.

4.4 Accommodation Affordability

The California Coastal Act mandates the protection and provision of lower-cost visitor and recreational facilities. Specifically, Section 30213 states that these facilities "shall be protected, encouraged, and, where feasible, provided."

To evaluate the affordability of overnight accommodations in Monterey County, this analysis uses the California Coastal Conservancy’s definition of Lower-Cost Coastal Accommodations (LCCAs)¹⁰. LCCAs are defined as lodging priced at 75% or less of the statewide average daily rate (ADR) for standard double-occupancy hotel and motel rooms during peak summer months (July and August) and located within the

¹⁰ Lower-cost Coastal Lodging, California Coastal Commission (2025), <https://www.coastal.ca.gov/lower-cost-coastal-lodging/> (last visited Apr 9, 2025).

Coastal Zone or within 1-mile of the coastline. This report applies that affordability threshold to both coastal and inland areas to allow a broader equity analysis.

According to Visit California and Smith Travel Research, the 2024 statewide average ADR for July and August was \$195. Seventy-five percent of that value results in an LCCA room threshold of \$146.25. On a per-person basis, assuming an average occupancy of 2.6 persons per room (based on national standards and the Monterey County Visitor Profile), the LCCA affordability threshold is approximately \$56 per guest per night.

This analysis compares the affordability and availability of STRs and hotels in Monterey County using 2023–2024 data from AirDNA (for STRs) and Smith Travel Research (for hotels). To normalize for guest capacity, STR ADRs were divided by the stated maximum occupancy for each listing, while hotel ADRs were divided by 2.6.¹¹

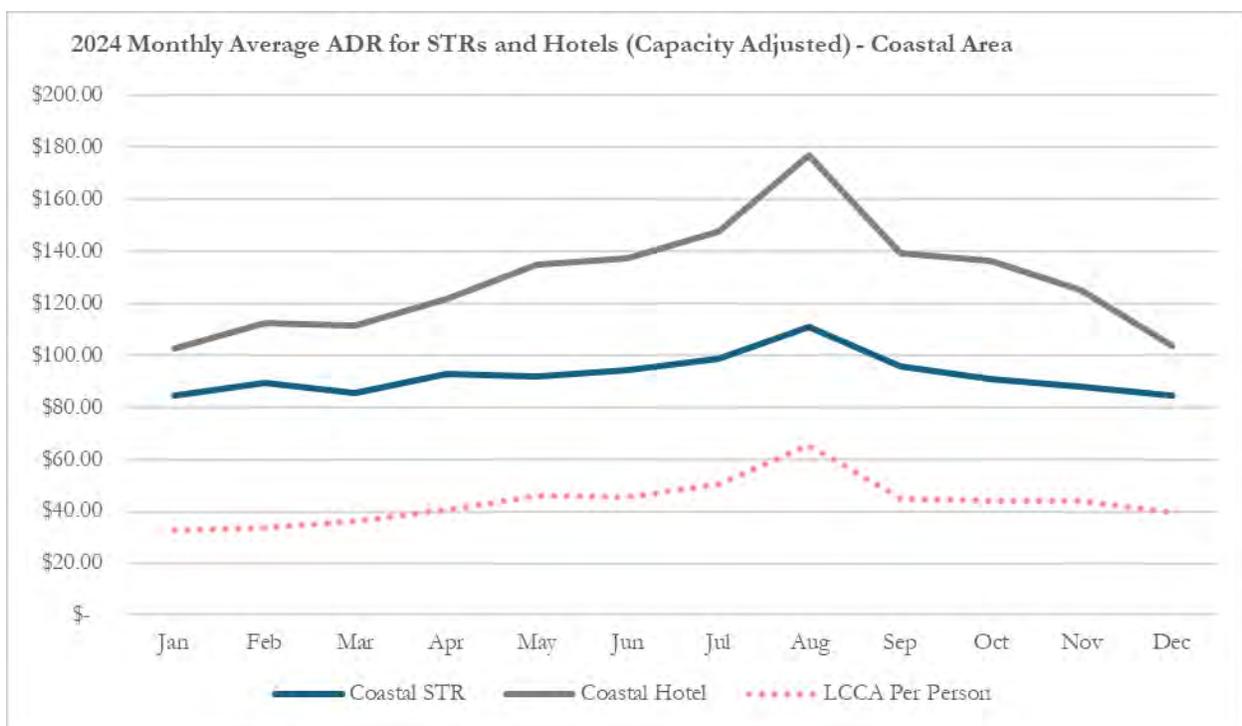


Figure 7: Comparing monthly ADRs for Coastal hotels and STRs.

Average daily rates (ADRs) per guest, standardized by occupancy, show that STRs offer significantly more affordable options than hotels across all months.

The comparison shown in Figure 7 highlights that STRs are consistently more affordable than hotel rooms in coastal Monterey County. STR affordability is largely due to higher guest capacity: the average STR accommodates about five people, with many listings hosting eight or more. In contrast, most hotel rooms accommodate only two to four guests. Moreover, STRs typically provide separate bedrooms, enhancing privacy and functionality for families and groups.

¹¹ Consistent with findings in the *Monterey County Visitor Profile Final Report*

Coastal hotels average more than \$150 per person per night for much of the year and exceed \$180 in August, the peak month. By contrast, coastal STRs average closer to \$100 per person per night and experience less dramatic price spikes during peak seasons. Non-coastal STRs remain even more affordable, with many listings falling well below the LCCA threshold throughout the year.

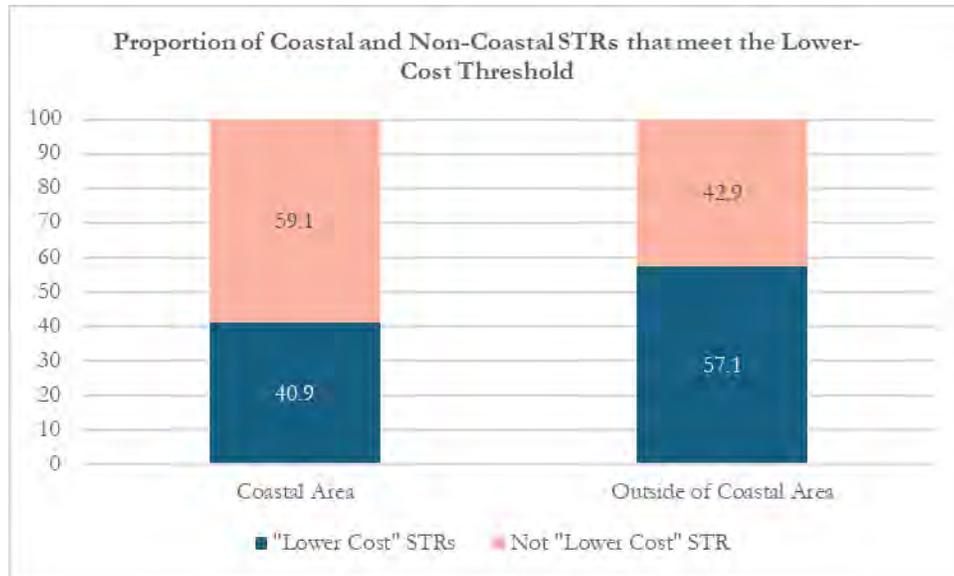
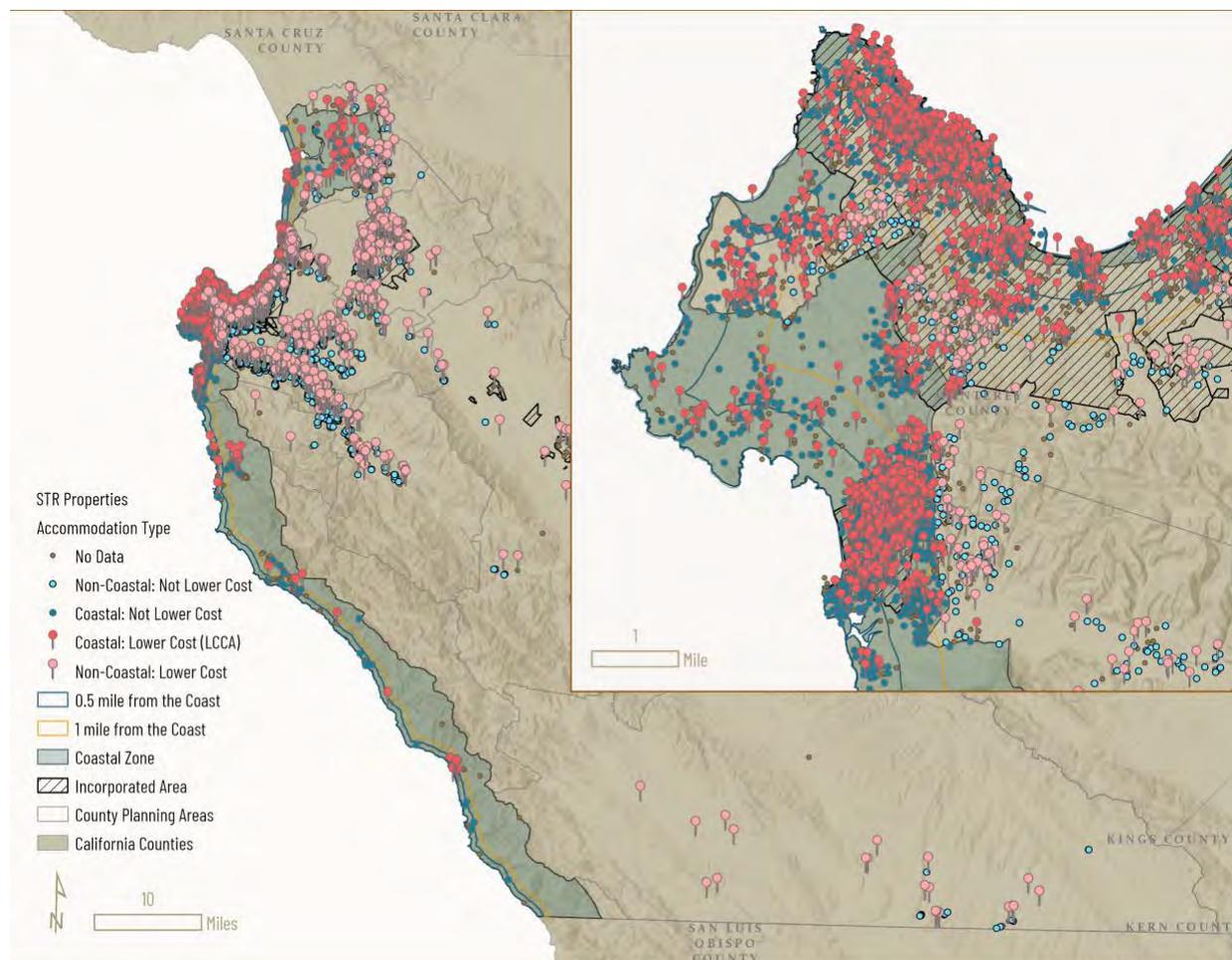


Figure 8: Proportion of Short-Term rentals in the coastal area (Coastal Zone and/or within 1-mile of the coast) and non-coastal areas that qualify as “lower-cost.” Lower-cost STRs within the coastal zone meet the definition of Lower-cost Coastal Accommodation (LCCA).

While the average per-person ADR for all STRs in the coastal area exceeds the LCCA threshold, a substantial proportion of individual STR listings qualify as affordable. As shown in Figure 8, 41% of STRs located within the coastal area meet the “lower-cost” threshold on a per-person basis. 57% of STRs inland meet the threshold. This demonstrates that despite variability in STR pricing, many units, especially inland, provide lower-cost accommodation options that align with Coastal Act goals for public access and affordability. However, Figure 9 shows that there are more LCCAs than non-coastal “lower-cost” STRs.

Map 7 displays the location and affordability classification of STRs across Monterey County, based on the California Coastal Conservancy’s definition of a Lower-Cost Coastal Accommodation (LCCA), set at \$57 or less per guest per night for summer 2024. STRs are categorized into four groups: those meeting the LCCA threshold within the Coastal Zone and/or 1-mile of the coast (Dark coral), those qualifying as lower-cost inland (light coral), STRs that exceed the threshold (teal), and properties with insufficient data for classification (brown). The inset highlights the spatial clustering of LCCA on the Monterey Peninsula and the significant number of lower-cost accommodation in the inland Carmel Valley region.



Map 7: Geographic Distribution of Short-Term Rentals (STRs) by Affordability Classification in Monterey County.

This map displays STR properties across Monterey County and surrounding areas, symbolized by affordability status. STRs are classified as either lower-cost coastal accommodations (meeting the California Coastal Conservancy’s LCCA threshold and within the Coastal Zone or within 1 mile of the coast), lower-cost inland accommodations, or not lower-cost. An inset provides additional detail for the Monterey Peninsula and Carmel Highlands.

Comparing the per-person nightly rate for all STRs to the lower-cost accommodation threshold, shown in Figure 9, reveals the greatest number of lower-cost accommodations are LCCAs. Approximately 18% of all STRs within 1-mile of the coast qualify as LCCAs, with most located in city jurisdictions. An additional 16% of STRs located inland of the Coastal Zone also meet the affordability threshold and can be considered “lower-cost”. In contrast, 38% of STRs are priced above the \$57 per-guest per-night threshold and are not considered low-cost, while 28% lack sufficient data for classification.

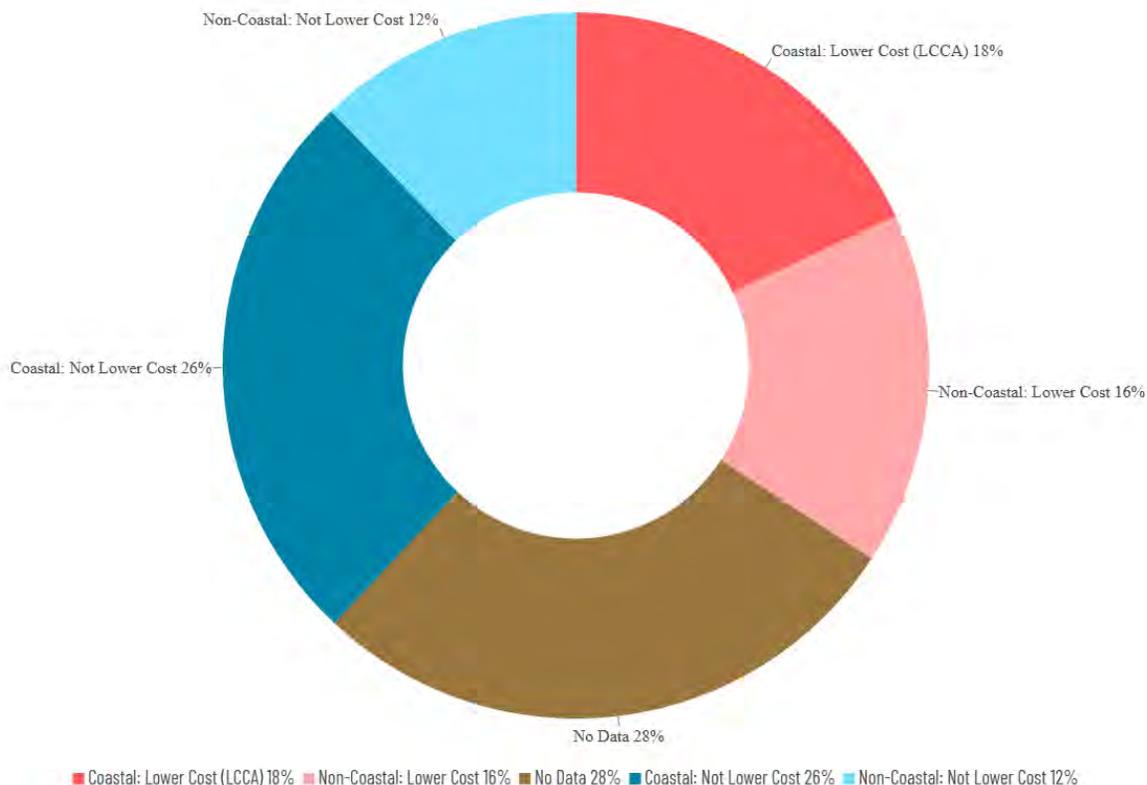


Figure 9: Distribution of Short-Term Rentals by Affordability Classification in Monterey County.
Distribution of STR Affordability by Coastal and Non-Coastal Location. This pie chart displays the share of short-term rentals (STRs) that qualify as lower-cost coastal accommodations (LCCAs), other lower-cost STRs located outside the coastal area, and non-lower-cost STRs in both coastal and non-coastal areas. Coastal STRs that meet the LCCA threshold make up 18% of the total sample, while 16% are lower-cost but located outside the Coastal Zone. Non-lower-cost STRs comprise 26% in coastal areas and 12% in non-coastal areas. The remaining 28% of STRs lack sufficient data for affordability classification.

4.4.1 Demand from Low-Income Visitors

Available and affordable accommodations will only help meet the California Coastal Commission’s (CCC) goal of increasing access for all if there is sufficient demand from lower-income visitors. The visitation data for Monterey County show that demand is not only present, but also substantial. Additionally, nearly 50% of visitors earn below the California median household income¹², and their demand far exceeds the supply of lower-cost hotel rooms.

Figure 10 illustrates this dynamic by comparing estimated daily overnight demand from lower-income visitors to the available capacity in more affordable hotel categories (“economy” and “midscale”). The teal peaks (visitor demand) that rise above the coral line (hotel capacity) reflect periods when demand exceeds supply. Because individual hotel pricing data are not available, this analysis considers all hotels in the “economy” and

¹² The Placer.ai data is anonymized; therefore, it does not provide the travel distance and income information for each visitor. Rather, it aggregates the data into overall income distributions for all visitors, including those closer than 100 miles. 50% of all visitors fall at or below the median income, and this same proportion was applied to overnight visitors.

“midscale” class represent lower-cost accommodations based on a sample of hotel room rates for July 2024. These hotel types collectively provide a capacity of about 4,200 guests. It is important to note that not all of these hotels would meet the LCCA (Lower-Cost Coastal Accommodation) threshold.

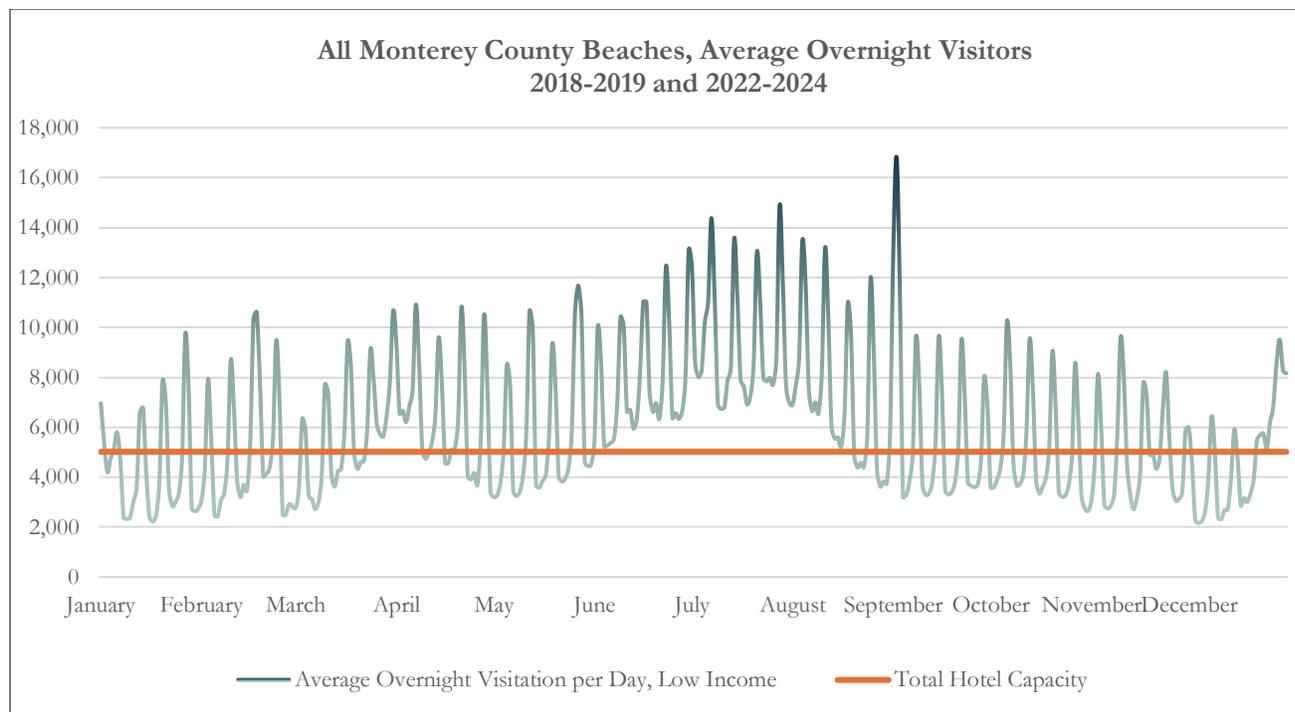


Figure 10: Daily demand from visitors earning below the state median income compared to estimated supply in affordable hotel categories.

Overall, the gap between demand and supply is persistent. Affordable hotel capacity falls short throughout the summer season and is particularly inadequate on weekends. For visitors with below the California median income, who often have limited flexibility in travel schedules, this lack of availability poses a significant barrier to coastal access. Table 10 breaks down this excess demand by region. In Table 10, the number of “Low Income Visitors” is defined as visitors with household incomes less than the California median income that live far enough away to warrant an overnight trip. The data indicate that the demand for lower cost accommodation in Monterey County is just over 2.2 million visitor nights per year.

Unfortunately, the supply of affordable accommodations (defined as “Economy” by Smith Travel Research) is limited to 1,931 rooms. Assuming 2.6 visitors per room, the total capacity if all rooms were occupied every night (100% occupancy) is just over 1.8 million, insufficient to meet the demand of 2.2 million. However, visitor demand is highly seasonal and much stronger on weekends. Taking actual demand trends into account, Monterey County hotels cannot meet the demand for affordable overnight accommodation for almost 600,000 (596,196 in Table 10 below) of the 2.2 million low-income visitors, resulting in a significant supply shortage. This is represented by the area between the trendline and hotel capacity indicated in Figure 10.

If one examines subregions of Monterey County, the concentration of “economy” hotels outside of these desirable coastal regions is clear. The Monterey Peninsula has fewer low-cost hotels, with only 221 affordable rooms. As with Monterey County overall, even if every affordable hotel room was filled every night the demand for affordable accommodation exceeds supply, creating a shortage of just over 125,000 visitor nights

that cannot be accommodated with economy hotels alone. As before, if one factors in weekend and seasonal demand, the shortage becomes even greater, 139,193 visitor nights. Finally, the Big Sur subregion faces an even greater shortage of affordable accommodations with only 15 economy rooms in the entire region. This capacity (14,235) is completely inadequate to meet the demand of 285,618 per year.

Table 10: Excess demand for affordable accommodation over hotel room capacity, by region

	Entirety of Monterey County	Monterey Peninsula Only	Highway 1/Big Sur Only
Low Income Visitor Demand	2,202,400	334,905	285,618
Number of Affordable Rooms	1,931	221	15
Affordable Hotel Room Guest Capacity	1,832,519	209,729	14,235
Shortage at 100% Daily	369,882	125,176	271,383
Actual Shortage, Accounting for Weekend/High Season Demand	596,156	139,193	271,383

Note: Regional figures may sum to more than the overall total due to overlapping demand areas. □

For those seeking to stay overnight in Big Sur, lodging choices are extremely limited and generally expensive. As shown in Map 6, there are only seven hotels along this stretch of coastline, which has the most acute shortage of affordable options for traditional overnight accommodations. Big Sur is a 90-minute to two-hour drive each way from the Monterey Peninsula, assuming no closures or delays along Highway 1. These disruptions are becoming more frequent due to landslides and infrastructure vulnerabilities. As a result, a family vacationing in Monterey who wishes to visit Big Sur would need to spend nearly half a day driving round-trip.

Staying in a hotel often comes with additional travel-related expenses, particularly meals. Most hotels do not include kitchens, meaning guests must dine out for the duration of their stay. To evaluate these added costs, Ceto examined the U.S. General Services Administration (GSA) per diem rates and conducted a digital survey of dining options in coastal Monterey County.

The GSA sets per diem allowances for federal employees traveling on official business within the continental United States. For fiscal year 2024, the meals and incidental expenses (M&IE) rate for Monterey County is \$74 per day, which includes \$17 for breakfast, \$18 for lunch, \$34 for dinner, and \$5 for incidental expenses.

A supplemental review of meal prices using Google Maps listings for restaurants in Monterey, Pacific Grove, Carmel, and Big Sur found an average daily cost of \$82 per person for three meals a day at the average price of a meal listed by Google. Pacific Grove appears to be the most expensive location, followed by Big Sur. For a family of four, daily dining expenses can range from \$212 to \$267, slightly lower than the GSA per diem rate.

To illustrate the impact of STRs on trip affordability, consider a hypothetical example of a family vacation to Big Sur. A family of four with two adults and two children planning a July 2025 trip and booking in mid-May would face the following costs:

If the family were to stay in a traditional hotel, the least expensive option available might be a standard room at Lucia Lodge for two nights at \$540 per night, totaling \$1,080 before taxes and fees. While this includes breakfast, the room is small, with limited space for four people. A more comfortable option, such as a larger room at Hidden Valley Inn with two king beds and additional space, would cost approximately \$1,200 per night or \$2,400 for the two-night stay.

Meals would add significantly to the total cost. Without kitchen access, the family would need to dine out for all meals. Based on the regional average of \$82 per person per day, the total for food would range from \$212 to \$267 per day for the family. Over a two-day stay, dining could cost between \$424 and \$534.

In total, the two-night trip would likely cost between \$1,500 and \$2,900, depending on the hotel selected and dining preferences. This estimate does not include transportation, park entrance fees, or other activities.

By contrast, a short-term rental with two bedrooms, kitchen facilities, and space for a family of four could be found for \$500 to \$700 per night. A two-night stay would total \$1,000 to \$1,400. With the ability to prepare meals, the family could reduce daily food expenses by preparing breakfast and dinner, potentially saving \$200 or more across the trip. In this scenario, the STR not only reduces lodging costs but also allows the family to spend more time together comfortably, with fewer added costs and a more flexible itinerary.

This example underscores how STRs can make coastal vacations significantly more accessible for families, especially those seeking affordability and flexibility.

4.5 Market Summary

Table 11: Comparing STR and hotel supply, capacity, and affordability county-wide

Accommodation	Total Rooms	Total Visitor Capacity	Mean ADR	Mean ADR Per Person	Percent of Total Coastal Area Capacity
STRs	18,057	43,502	\$ 302.00	\$ 75.00	80%
Hotels	8,809	22,903	\$ 316.00	\$ 122.00	20%

The data on visitor demand and accommodation supply indicate that STRs play a vital role in Monterey County’s lodging landscape. STRs help meet excess demand, particularly during peak periods, and provide a broader range of price points and geographic options to accommodate diverse visitor preferences.

STRs support affordability in multiple ways. Most offer kitchens, allowing visitors to reduce food costs by up to \$267 per day for a family of four. STRs also provide larger living spaces, which make them especially attractive to families and groups, and contribute to lower per-person costs.

Key differences between hotels and STRs in Monterey County, as summarized in Table 11, include:

- **Affordability:** STRs are, on average, nearly \$50 less per person per night. In other words, hotels are 60% more expensive per person than STRs.

- **Capacity:** STRs provide nearly twice the total guest capacity of hotels.
- **Coastal Access:** STRs account for 80% of total visitor capacity within the coastal area.

Together, these attributes demonstrate the critical role STRs play in expanding access to Monterey County's coastal destinations, particularly for visitors seeking affordable and flexible lodging.

These findings highlight the importance of short-term rentals in supporting both capacity and affordability across the county's overnight lodging market. As hotel development trends continue to favor higher-end offerings and as coastal demand remains strong across income groups, preserving a diverse and affordable STR inventory will be essential. Without policy support—especially for STRs that meet affordability thresholds and serve Coastal Zones—many cost-conscious visitors risk being priced out, undermining the access goals of the California Coastal Act. Sustaining STR availability is not only a housing or tourism issue, but a matter of public access and coastal equity.

5. Housing Market Context and STR Impacts

This section examines the relationship between short-term rentals (STRs) and the broader housing market in Monterey County. This analysis examines the full AirDNA dataset and therefore any property that has been listed as a short-term rental in the period from 2018 to 2024. Importantly, most of these properties are not listed every night or consistently across those years. Properties move in and out of use as STRs across the 2018 to 2024 period. There are 8,863 individual properties in the full dataset, however, in 2024, there were an average of 2,190 unique active properties listed on the STR platforms, or about one quarter of the total number of listings. The number of active listings is consistent across the 2018 to 2024 timeframe.

Property tax data indicate that a substantial share of properties (approximately 48%) function as second homes or investment holdings rather than primary residences. However, properties actively listed as STRs make up 2.2% of the total residential housing stock, and many of these listings are only available part-time when owners are not occupying the property. Over the 2018-2024 period, 10% of parcels have, at some point, been listed as an STR, which indicates highly variable listings, and few properties used as long-term, consistent STR. This suggests relatively few commercial listings in long term operation.

Overall, the housing market in Monterey County closely resembles broader trends observed across California's coastal regions. Affordability declines sharply as properties approach the coastline, where desirable location, restrictive zoning, and limited housing development contribute to the scarcity of available units. Home prices in coastal areas are roughly twice as high as those in inland regions, reflecting persistent supply constraints.

Within this context, where long-term access to coastal communities through ownership or rental is out of reach for most families across California, STRs provide an important mechanism for coastal access. They allow families and groups to visit high-demand areas, such as Big Sur or Carmel, that would otherwise be inaccessible due to the high cost of travel.

To understand the role of STRs within the housing landscape, this analysis used parcel-level assessor data for Monterey County from 2024. The following indicators informed the analysis:

- **Parcel location**, including whether a property lies within the Coastal Zone, within one mile of the shoreline, or within a County Planning Area (CPA).
- **Assessed value**, which reflects the taxable value set by the County Assessor. This figure typically lags behind current market price and serves as a proxy for long-term affordability.
- **Ownership classification**, based on the match between the taxpayer's mailing address and the parcel address. Properties with identical addresses were considered owner-occupied. Those with differing addresses were assumed to be second homes, investment properties, or used as STRs.

5.1 Monterey County Residential Property

Despite strong demand for coastal access, only a small share of residential parcels in Monterey County are located within the Coastal Zone, limiting opportunities for both housing and visitor accommodations in these highly desirable areas. As shown in Table 12, only 13% of all residential parcels lie within the Monterey County Coastal Zone. Furthermore, only 10% of all residential parcels are within a reasonable walking

distance (half mile) of the coast, and 78% of residential properties are greater than 1-mile from the coast¹³. As discussed above, properties within the Coastal Zone have significantly higher assessed value¹⁴ than those outside of the Coastal Zone. Residential parcels within the Coastal Zone are assessed at nearly three times the value of those outside the Coastal Zone (Table 12). The limited stock and high price of housing in the Coastal Zone suggests that this region is already unaffordable to most. Past research suggests that in areas where affordable housing is lacking, STRs do not significantly impact the housing market because the potential revenue gains have long since been recaptured, and housing price pressures are already so extreme that the entire area is unaffordable¹⁵. Prices in these areas, as with much of the California Coastal Zone, limit the ability for most to reside near the coast and therefore, reduce the ease of coastal access.

Table 12: Residential Parcels by Coastal Zone Location and Assessed Value

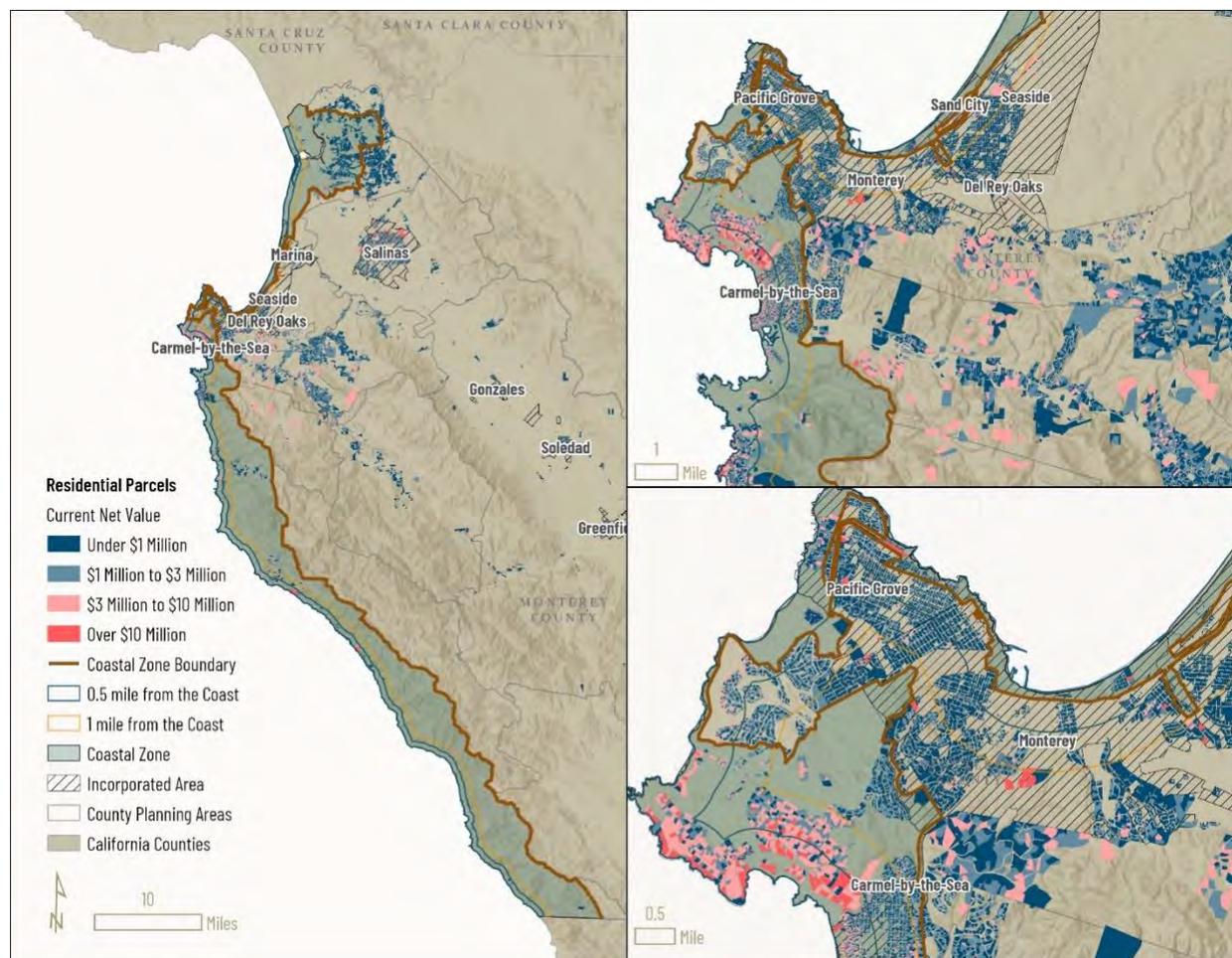
Area	Number of Parcels	% Residential Parcels	Assessed Value
Coastal Zone	13,029	13%	\$ 1,494,584
Not in the Coastal Zone	85,497	87%	\$ 536,725

The high assessed value of properties in the Coastal Zone is driven primarily by parcels near Carmel-by-the-Sea, in the unincorporated Pebble Beach community. Most properties here, as shown in Map 8, are valued over \$3 million, with many over \$10 million. In general, high-value residential properties (over \$3 million) are heavily concentrated in the coastal communities, particularly within the Coastal Zone. In contrast, inland areas and much of north and south county exhibit lower parcel valuations.

¹³ The Monterey County Coastal Zone does not extend a consistent geographic distance from the shoreline; in some areas it is much less than 1-mile wide and in others extend further inland. See *Figure 1* for a visual depiction.

¹⁴ As assessed value is typically based on the property's purchase price at the time of acquisition, with adjustments allowed annually for inflation (limited to 2% per year under California's Proposition 13), the sale value or fair market value (FMV) of these properties is likely even higher than the property values provided by the Monterey County parcel data.

¹⁵ See *Unequal Accommodations: Protecting Affordable Accommodations Along California's Coast*, <https://news.airbnb.com/report-short-term-rentals-can-help-increase-access-to-california-coast/>; Chapple, Karen. "Income Inequality and Urban Displacement: The New Gentrification." 2017. *New Labor Forum* 26, no. 1: 84–93. <https://doi.org/10.1177/1095796016682018>; Freeman, Lance, and Jenny Schuetz. 2017. "Producing Affordable Housing in Rising Markets: What Works?" *Cityscape* 19, no. 1: 217–236. <https://www.jstor.org/stable/10.2307/26328307>.



Map 8: Current Assessed Net Value of Residential Parcels in Monterey County with Coastal Zone and Proximity Indicators.

This map displays the spatial distribution of residential parcels by current net assessed value, categorized into four valuation tiers ranging from under \$1 million to over \$10 million. The Coastal Zone boundary, along with 0.5 mile and 1-mile coastal proximity corridors, are shown for reference. Insets provide detailed views of valuation patterns on the Monterey Peninsula.

While assessed values provide useful insight into parcel-level ownership and long-term patterns, they significantly understate current affordability challenges; to capture market realities this analysis incorporates Zillow Market Trends¹⁶ based on the Zillow Home Value Index (ZHVI). The Zillow data reflect more recent market conditions and is consistent with results from the parcel data: coastal communities are significantly more expensive than inland areas. For example, typical home values in the Coast-Big Sur CPA exceed \$2.2 million, while homes in inland CPAs such as South County and Central Salinas Valley average approximately \$519,000 and \$738,000 respectively, below the statewide average (\$784,840). Figure 11 compares the ZHVI average property price for submarkets within Monterey County in March 2025.

Despite the higher cost of coastal areas, it’s important to note that home prices are relatively affordable compared to other markets within the state, especially other coastal areas, as indicated in Figure 11, which compares the average residential property price in California (according to Zillow) of about \$750,000, with

¹⁶ <https://www.zillow.com/home-values/2444/monterey-county-ca/>

average housing prices in different regions of Monterey County. Although prices in coastal areas such as Big Sur are higher, there are pockets of relative affordability predominantly in Salinas and residential communities along U.S. 101. As noted above, many State and local policies have limited residential development along the coast through restrictive zoning laws, raising costs.



Figure 11: Average Residential Property Price in Monterey County

Rental prices across much of Monterey County are relatively close to the California state average. According to the U.S. Census, 47.7% of Monterey County’s 146,000 housing units are renter-occupied¹⁷. Accounting for multifamily housing as indicated in the parcel data, rental properties make up approximately 52% of all properties not occupied by the owner, with the other 48% likely second homes (or primary residences held in trust). In other words, approximately 25% of all residential parcels are used as long-term rental housing. To examine rental prices in Monterey County, Ceto used Zillow Rental Market Trends to capture the current rental market in Monterey County¹⁸. For example, the City of Monterey reports an average rent of \$2,480, less than \$100 above the statewide average. Rents in Marina, Pacific Grove, Carmel Valley and even Big Sur are less than 20% above the State average. Inland, Salinas has average rents under \$2000 a month, 20% below the State average. This suggests that STRs have made minimal impact on the long-term rental market in Monterey County.

¹⁷ U.S. Census Bureau. (n.d.). *Monterey County, California – QuickFacts*. Retrieved June 9, 2025.

¹⁸ Rent Comparison Tool & Rental Market Trends data | Zillow rental manager, Rental Market Trends (2025), <https://www.zillow.com/rental-manager/market-trends/> (last visited Apr 9, 2025).

5.2 Occupancy and Ownership

To better understand the role of STRs within the housing stock, this analysis examined parcel ownership data to estimate the proportion of homes used as investment properties or second homes. The parcel ownership data reveals that nearly half (48%) of all residential properties in Monterey County are not owner-occupied (Table 13; Figure 16). This analysis compares the parcel address to the taxpayer mailing address to infer about ownership and occupancy. Parcels registered to a taxpayer at that address are likely owner occupied, a primary residence¹⁹. All properties where the taxpayer address differs from the parcel address are considered investment properties (long-term or short-term rental) or vacation homes for the purposes of this analysis, however, some of these properties may be owner-occupied but registered to a family trust or LLC for tax purposes.

Table 13: Distribution of residential parcel ownership in Monterey County.

Category	Number of Parcels	% Residential Parcels
Owner-Occupied	51,238	52%
In-County Owners	27,099	28%
Out of County CA Owners	17,075	17%
Out of State Owners	3,114	3%

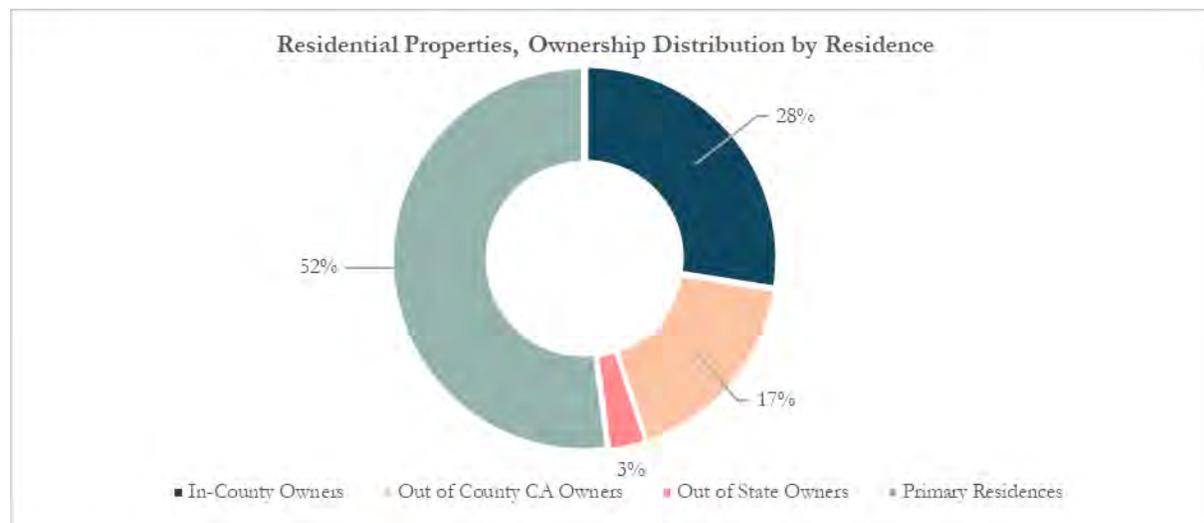


Figure 12: Ownership Distribution of Residential Properties in Monterey County by Owner Residence. This donut chart displays the distribution of residential property ownership based on the owner’s place of residence. Approximately 52% of residential parcels are classified as primary residences, where the owner’s mailing address matches the property address. Among non-primary residences, 28% are owned by individuals with a mailing address in Monterey County, 17% by California residents outside the county, and 3% by out-of-state owners.

The comparative analysis found that just over half (52%) of parcels are likely owner-occupied, primary residences with the taxpayer living at the parcel address. Of the 98,526 residential parcels in the County, 47,288 are registered to another address. Twenty-eight percent of all parcels are registered to a taxpayer at

¹⁹ Importantly, an owner-occupied property may be used as a hosted STR.

another address in Monterey County²⁰, while 17% are registered to a taxpayer at a California address outside of the County, and 3% to a taxpayer outside of California (Figure 12). As noted above, 52% of these parcels are estimated to be long-term rentals, the other 48% are most likely vacant investment holdings, second homes, or held in trust, with a small proportion (5%) listed for STR in a given month.

5.3 Distribution of STRs

While parcel ownership patterns reveal many non-primary residences along the coast, the STR listing data shows that **only a small fraction of these properties have been listed as short-term rentals between 2018 and 2024**. Short-term rental (STR) listing data from 2018 to 2024 includes 8,863 total listings, representing less than 9% of all residential parcels in the county at one point used as a STR. This includes the 547 properties that have been used as *hosted* STRs, where the primary resident is present while the STR is rented. Properties that have been listed as *unhosted* STRs alone account for approximately 18% of residential parcels not occupied by the taxpayer, that is, parcels where the owner's mailing address differs from the property address. Out of total housing stock, properties that have been listed as unhosted STRs account for 7% of all properties. **Active STR listings for 2024 indicate 2,190 average STRs operational and available per month, or 2.2% of all properties. Importantly, having been listed as an STR in the dataset does not indicate that a property is used primarily as a STR or that it is rented every night.**

STR distribution and prevalence reflects visitor demand, STRs make up a greater proportion of Coastal Zone residential properties compared to properties outside of the Coastal Zone. Of the just over 13,000 of total residential properties within the Coastal Zone, 25% have been listed as an STR (hosted or unhosted) at some time between 2018 and 2024. However, monthly, less than 1,000 properties are listed as active STRs in the Coastal Zone, less than 8% of Coastal Zone properties. Outside of the Coastal Zone, only 6% of the nearly 86,000 properties have ever been listed as STRs between 2018 and 2024.

Comparing STR locations, as reported by AirDNA, to the County parcel database reveals that the share of housing stock used as short-term rentals varies significantly across County Planning Areas (CPAs). Since hosted STRs are likely to be owner-occupied properties (or a long-term rental), hosted STRs were omitted from this analysis. Unhosted STRs are most prevalent in coastal CPAs which offer some of the most desirable coastal access in Monterey County, but their exclusivity, driven by both property price and hotel scarcity, limits access for most Californians. In this context, STRs may provide one of the only means for broader public use of high-value coastal neighborhoods. As shown in Table 8, coastal STRs are relatively affordable, averaging \$81 per person per night with many less than \$50 per person, and therefore open greater opportunities for access.

Table 14: Distribution of STRs within County Planning Areas (CPAs) compared to residential parcels

Area	Number of Residential Parcels	Number of STRs	Percent of Total Properties Used as Unhosted STRs
Inland CPAs: Central Salinas Valley, Greater Salinas, North County, South County	47,559	536	1%

²⁰ Ceto’s preliminary analysis determines owner’s residence within the county by Zip Code. However, some Zip Codes may correspond to multiple counties. Therefore, some Monterey County owners may reside in adjacent counties in the Monterey region.

Coastal CPAs: North County LCP, Moss Landing, Greater Monterey Peninsula, Del Monte Forest, Carmel LUP, Coast-Big Sur	40,702	5,260	13%
Near-Coastal CPAs: Cachagua, Carmel Valley, Fort Ord, Toro	10,265	963	9%
Total	98,526	6,759	7%

County Planning Areas (CPAs) that include the Coastal Zone (noted in Table 14 as “Coastal”) exhibit the highest share of unhosted STRs, the strongest visitor demand, and the least affordable for-sale housing stock. In the Coastal CPAs, STRs comprise 13% of all residential parcels. In Near-Coastal (Cachagua, Carmel Valley, Fort Ord, Toro), STRs comprise 9% of all residential parcels. In these high-cost areas, STRs may serve as one of the few remaining mechanisms for broader public access, particularly for visitors and families who cannot afford to purchase or rent homes near the coast.

Limiting STRs in coastal communities without a corresponding strategy to meet visitor demand may shift short-term rental pressure inland, where homes are more affordable but not designed to absorb tourism-driven use.

6. Monterey County Policy Jurisdiction

Monterey County has jurisdiction over all unincorporated areas, which make up 98% of Monterey County and include 32% of parcels and 42% of all STRs. These STRs provide 8,458 total rooms and 32% of total guest capacity in the County (including hotels). Comparing affordability of STRs under county and city jurisdictions, shown in Table 15, reveals that the County has jurisdiction over 25% of all LCCAs in the Coastal Zone and in the coastal area outside the Coastal Zone, but within 1 mile of the coast²¹ and 37% of all lower-cost accommodation outside the Coastal Zone and coastal area, for 31% of all “affordable” STRs. While the majority of lower-cost accommodations fall under the jurisdiction of various cities, including Monterey and Carmel-by-the-Sea, the County has jurisdiction over all the LCCAs in less developed areas, like the Big Sur coast. Affordable STRs under City and County jurisdiction have similar per-guest rates averaging between \$34 and \$37 per night.

Table 15: Distribution of STRs considered Lower-Cost Coastal Accommodation by Jurisdiction in Monterey County.

Affordability Status	STRs in City Jurisdiction	STRs in County Jurisdiction	STRs in All Jurisdictions	Percent of STRs Under County Jurisdiction
LCCA (\$57 or less per guest per night and within Coastal Zone and 1-mile of the coast)	1,189	404	1,593	25%

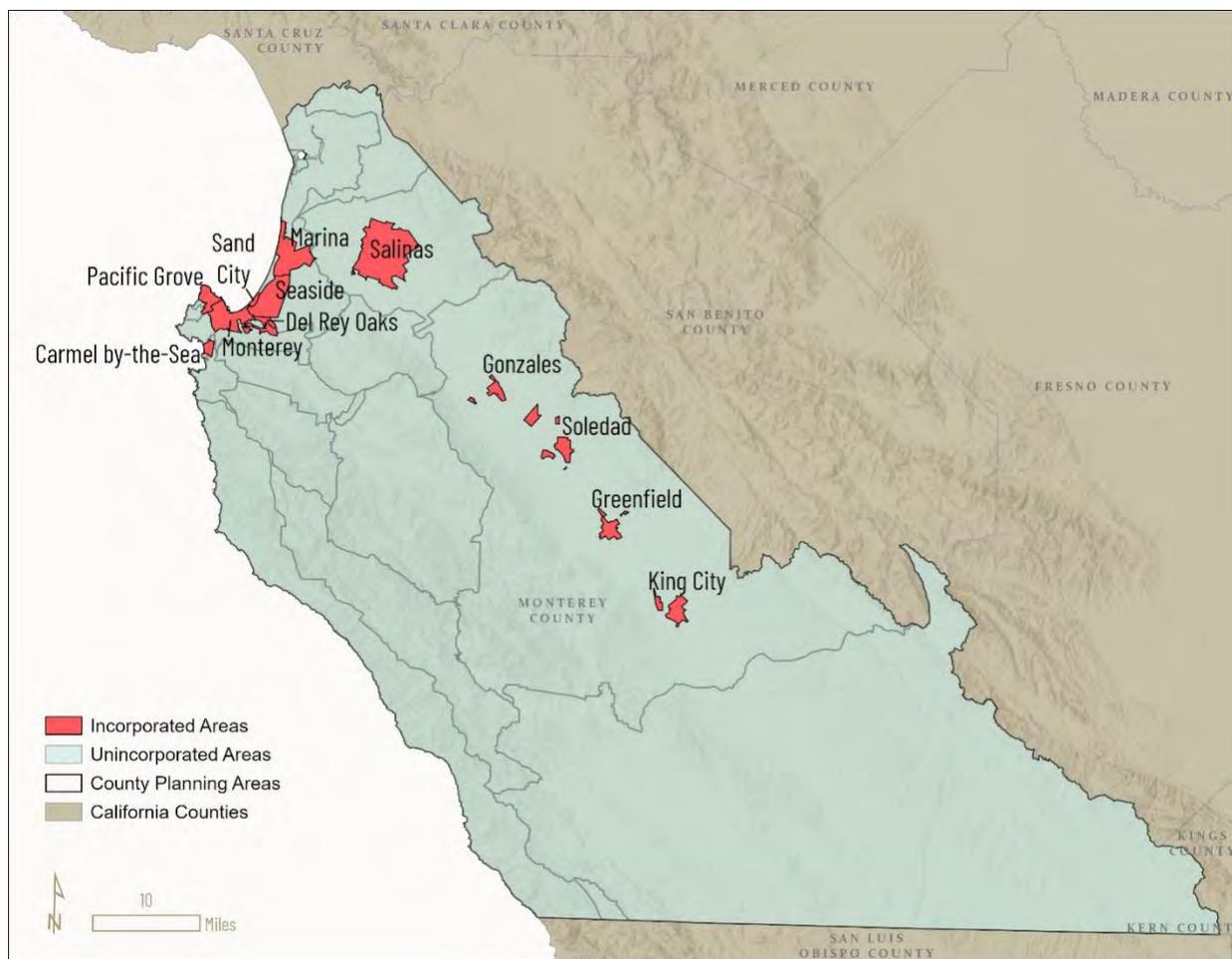
²¹ Based on the California Coastal Conservancy’s definition of Lower-Cost Coastal Accommodations (LCCAs), which are priced at or below 75% of the statewide average daily rate (ADR) for hotels during the summer season. Using STR data from Visit California for June (\$192), July (\$200), and August (\$194) of 2024, the average statewide summer ADR is \$195. Applying the 75% threshold (\$146.25) and adjusting for average hotel room occupancy (2.6 guests per room), the per-person LCCA threshold is set at \$57 per guest per night.

“Lower-cost” (\$57 or less per guest per night, outside of Coastal Zone and greater than 1-mile from the coast)	898	536	1,434	37%
Unaffordable (does not meet definition of lower cost)	1,601	1,766	3,367	52%
Total STRs	3,688	2,706	6,394	42%

Note: for 2,469 STRs, AirDNA data was insufficient to determine LCCA status. Most of these properties did not provide consistent ADR or occupancy information necessary to determine the per-person, per-night rate.

6.1 Incorporated Areas

Monterey County has 12 incorporated cities: Carmel-by-the-Sea, Del Rey Oaks, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Sand City, Seaside, and Soledad. These city boundaries encompass approximately 69 square miles of the county’s total 3,313 square miles, or about 2% of the land area. The remaining 98% of the county is unincorporated and subject to Monterey County’s land use and zoning jurisdiction. This distinction is critical for understanding the regulatory responsibilities and tax revenue flows associated with short-term rental activities, as nearly half of these properties fall under county rather than city jurisdiction. Map 9 situates the 12 incorporated cities within Monterey County and shows their geographic extent.



Map 9: Incorporated Cities of Monterey County.

The map shows the boundaries of the 12 incorporated cities within Monterey County: Carmel-by-the-Sea, Del Rey Oaks, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Sand City, Seaside, and Soledad. These cities collectively represent approximately 2% of the county’s total land area, with the remaining 98% classified as unincorporated and under county jurisdiction.

6.2 STRs Under County Jurisdiction

Comparing listings across incorporated and unincorporated areas, as shown in Figure 13 below, shows the distribution of STRs. As indicated, the majority of STRs are within unincorporated areas, the planning area called “the Greater Monterey Peninsula.” This area encompasses both the coastal region north of Monterey and the unincorporated area along Carmel Valley Road extending inland.

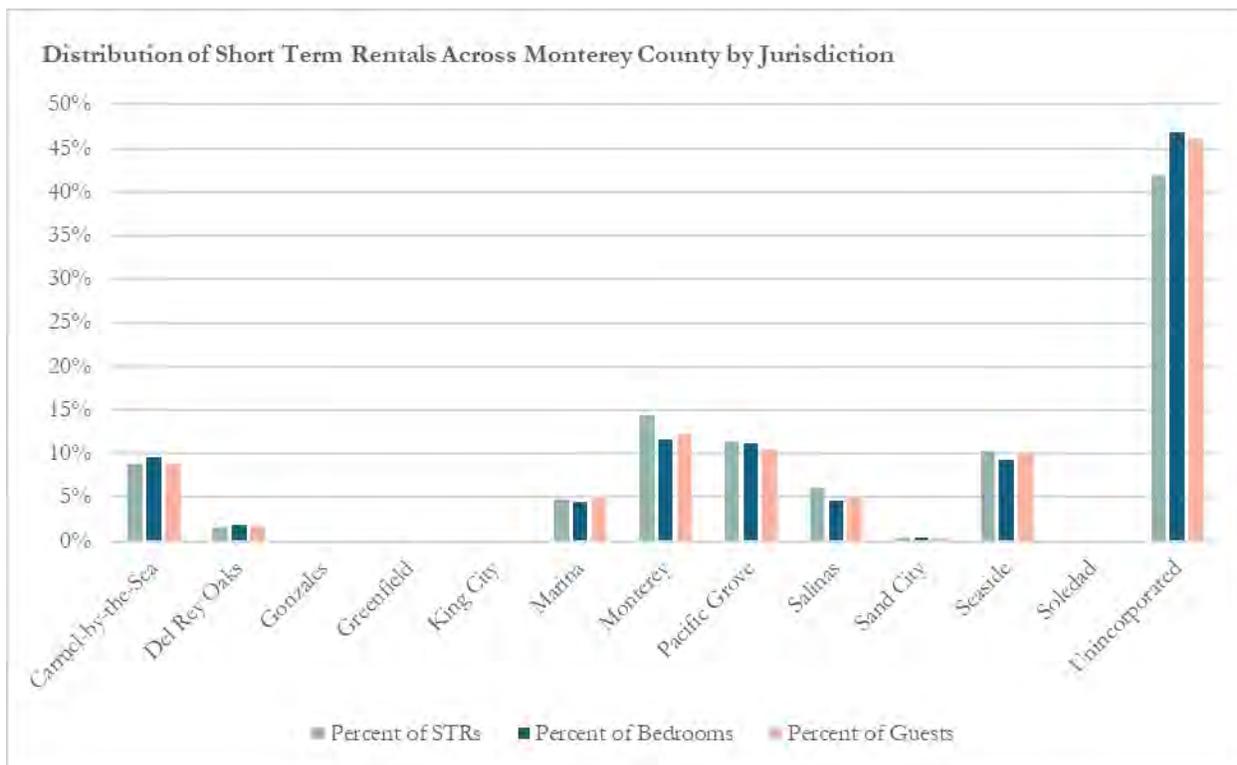


Figure 13: Distribution of Short-Term Rentals and Visitor Capacity by Jurisdiction Type in Monterey County. The table summarizes the number of short-term rental (STR) properties, total bedrooms, and estimated guest capacity within incorporated cities and unincorporated areas of Monterey County. While incorporated cities account for 58% of STR properties and 54% of total guest capacity, unincorporated areas provide a substantial 42% of STR inventory and 46% of guest capacity.

Each incorporated area regulates the STRs under their jurisdiction, while those STRs outside of incorporated areas are regulated by Monterey County.

- **Salinas** does not explicitly address short-term rentals under current regulations but has attempted to enforce a silent ban on short-term rentals of less than 30 days.
- **Carmel-by-the-Sea** bans all STRs of less than 30 days in most residential zones; however, STRs are allowed in certain commercial (CC, SC, RC) and multi-family (R-4) districts under two types of permits: Legal Non-conforming (for units operating before Ordinance 2019-03) and Housing Incentive Permits (allowing one STR for every three new rental units created). All such uses remain prohibited in the R-1 (single-family residential) zone.
- **City of Monterey** strictly prohibits all STRs under 30 days across all residential zones. The city actively enforces this regulation and encourages residents to report illegal STR activity to its Code Compliance Division.
- **Del Rey Oaks** allows up to 25 STR licenses citywide, a limit that has already been reached. Only properties with an approved Short-Term Rental License may operate, and hosts must comply with display, occupancy, and other local requirements.

- **Marina** permits STRs only in owner-occupied homes. Long-term rental properties and accessory dwelling units (ADUs and JADUs) are not eligible. STR operators must obtain a permit from the city and comply with its zoning and occupancy rules.
- **Pacific Grove** allows STRs only in designated Coastal and Commercial zones. Home-sharing, defined as renting part of a home while the owner is present, is permitted citywide. Both types require city licenses, and operators must pay a 12% transient occupancy tax (TOT). The city also enforces license caps and density limits to manage STR concentration.

Monterey County Unincorporated Areas

As of October 2024, the County requires non-coastal STRs, those outside of the Coastal Zone to be limited to only 4% per each planning area, which will result in a substantial share of existing rentals ceasing operation. The county imposes different limits on STRs based on three classifications:

- **Homestay:** A hosted STR. Allowed throughout the county, but frequency limited to one rental per seven-day period.
- **Limited Vacation Rental:** An unhosted STR rented three or fewer times per year. Allowed throughout the county but frequency limited to one rental per seven-day period.
- **Commercial Vacation Rental:** An unhosted STR rented more than three times per year. No frequency cap but excluded from or severely restricted in the residential zones of the Coastal Zone in Big Sur, the Carmel Area Land Use Plan area (including the Carmel Highlands) and Moss Landing.

The AirDNA data indicates that the areas in which Commercial Vacation Rentals are eliminated or restricted are popular and significant visitor destination areas possessing significant recreational value. Big Sur is one of the most desirable locations to visit, and already (as indicated before) has a severe deficit of overnight accommodations, especially affordable options.

Finally, the County's regulations require owners and operators to comply with multiple additional requirements, including a business license, a vacation rental operation license and, for Commercial Vacation Rentals, a Use Permit (inland) or Coastal Development Permit (Coastal Zone). These requirements can result in increased costs and thus further reduce the supply of affordable accommodations²².

The County is waiting on Coastal Commission approval to be able to apply these regulations in the Coastal Zone. This Coastal Zone covers 404 existing LCCA STRs, and the imposition of the new regulations and associated fees and other costs will likely decrease the supply of affordable STRs and directly increase ADRs to cover permitting fees and costs. Furthermore, the decreases in supply will, according to economic principle, indirectly drive up ADRs. **Of the total supply of STRs, 11% can be considered lower cost under the state Coastal Conservancy definition of affordable and are within County land use and zoning jurisdiction. These STRs are most vulnerable to closure with the increased operating costs under the proposed regulations. If they don't close, they will likely have to raise rates to offset the additional costs and may no longer be considered lower-cost accommodations. This adversely impacts visitor access to the coast.**

Overall, the county's coastal and inland regulations, taken together, directly affect 42% of all STRs, and 31% of all LCCAs across the entire county jurisdiction. The county's proposed coastal ordinance will likely result

²² See *Unequal Accommodations: Protecting Affordable Accommodations Along California's Coast*, <https://news.airbnb.com/report-short-term-rentals-can-help-increase-access-to-california-coast/>.

in less access to the coast and fewer affordable options in Monterey County. Furthermore, if excess demand persists or grows, it may result in increased numbers of STRs further inland, in areas with lower income populations, more affordable housing stock, and less visitor-serving infrastructure.

7. Recommendations

This report finds that short-term rentals (STRs) are essential to meeting Monterey County's visitor demand for overnight lodging. STRs provide much of the County's capacity, especially for lower-income visitors and those traveling with families, filling gaps left by a hotel sector that is increasingly focused on high-end accommodations.

While Monterey County's hotel market is stable and maintains occupancy rates above 60%, it does not fully meet the needs of today's travel market. Demand in Monterey County is driven heavily by leisure travel, peaking on weekends and during summer months. These patterns pose challenges for traditional hotels, particularly budget hotels that rely on more consistent occupancy. Following the COVID-19 pandemic, the hotel market has shifted decisively toward upper midscale and luxury classes. Since 2019, the County has lost 6% of its economy hotel rooms while gaining significant capacity in more expensive segments.

STRs are better suited to meet the County's seasonal and weekend-focused travel demand. They offer more flexible booking options, kitchens that reduce trip costs, and larger spaces that accommodate families and groups. In areas like Big Sur, where hotel development is severely limited, STRs are often the only available accommodations. On a per-person basis, many STRs meet affordability thresholds under the California Coastal Conservancy's definition of lower-cost coastal accommodations (LCCAs), particularly because they accommodate more guests per unit than hotels.

Restricting STRs under current market conditions would likely reduce the overall supply of affordable accommodations. As the report shows, roughly half of all coastal visitors fall below the California median income. STR restrictions would therefore disproportionately impact lower-income households and undermine the Coastal Act's commitment to maximizing public access.

Options for Monterey County

1. Expand Coastal-Zone Accommodations

Encourage or incentivize the development and permitting of lower-cost hotels, hostels, motels, and STRs within or near the Coastal Zone. This is particularly important in areas underserved by affordable options, including Big Sur and inland visitor corridors.

2. Reform STR Policies to Support Affordability

Simplify STR permitting processes, reduce associated fees, and promote enforcement-oriented Good Neighbor policies. These policies, already in place in cities like Santa Cruz and San Diego, include occupancy caps, 24/7 local contact requirements, neighbor notification, and enforcement for nuisance complaints. They offer a framework to maintain community standards without eliminating access.

3. Incentivize Affordable Lodging

Consider mechanisms such as reduced permitting costs for affordable STRs, in-lieu fees to fund new low-cost accommodations, or set-aside requirements in new developments. For example, developers could be required to include hostel-style lodging or family-friendly lower-cost units. Public or nonprofit subsidies may be needed to support these efforts.

4. Expand Access Programs for Underserved Communities

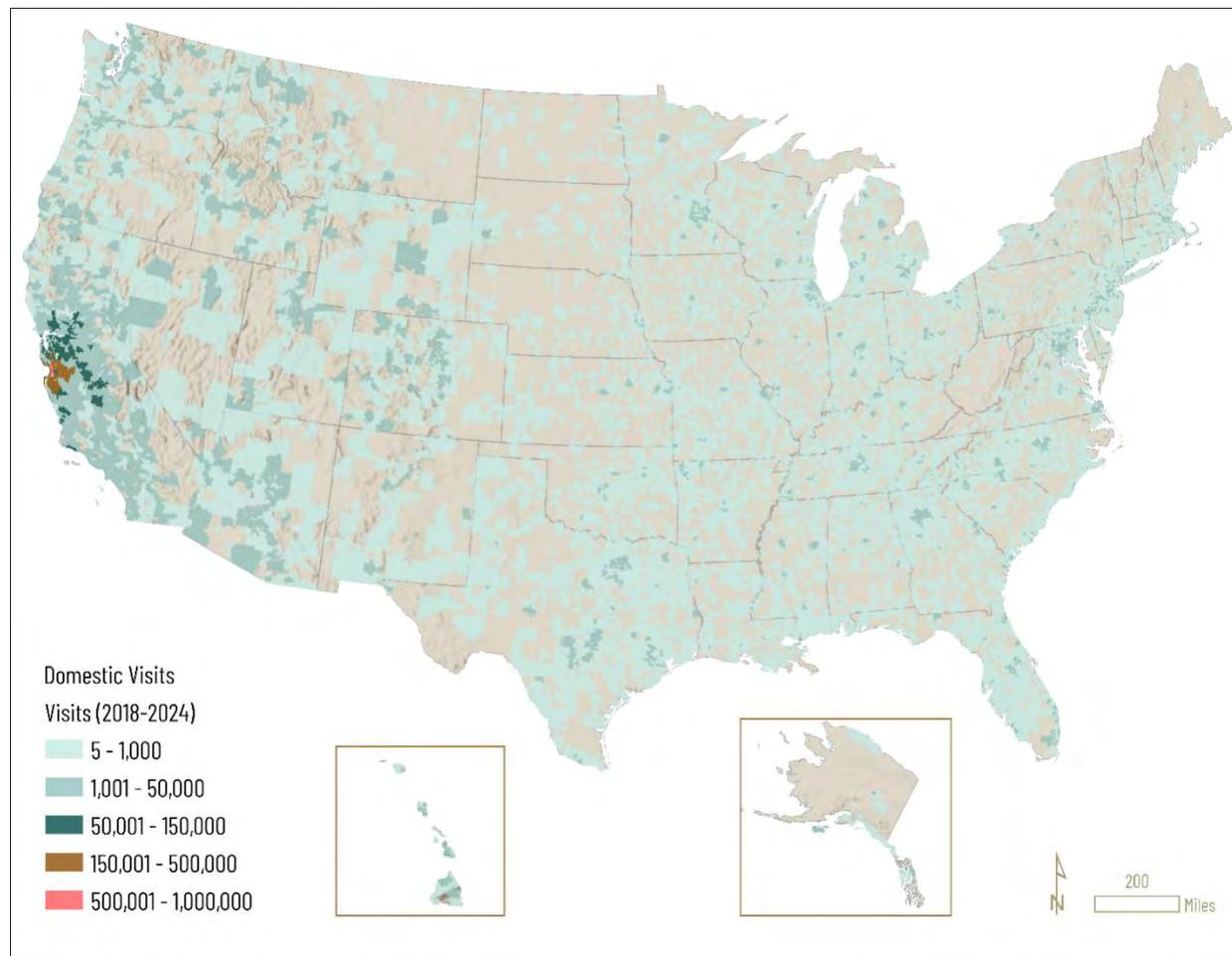
Include STRs as eligible accommodations in State-supported access programs such as “Explore the Coast Overnight,” which currently focuses on campgrounds and hotels. Voucher or subsidy-based systems could help broaden access to coastal trips for lower-income Californians.

5. Align Local Coastal Programs with Coastal Act Mandates

Update Local Coastal Programs (LCPs) to recognize and support the essential role STRs play in implementing Chapter 3 of the Coastal Act. Current LCPs are often silent on STRs, despite their significance in providing coastal access for lower- and moderate-income visitors. Public Resources Code § 30210 requires that “maximum access . . . for all the people” be provided to the coast, while § 30213 mandates that lower-cost visitor-serving accommodations be protected, encouraged, and, where feasible, provided. In Monterey County, STRs are filling this need in ways the hotel market no longer can. LCP updates should acknowledge this function and avoid blanket restrictions that reduce availability or affordability. STR-specific policies must be crafted to ensure that lower-cost units, particularly those in the Coastal Zone and proximity corridors, remain accessible to the public.

Appendix A: Domestic Visitation

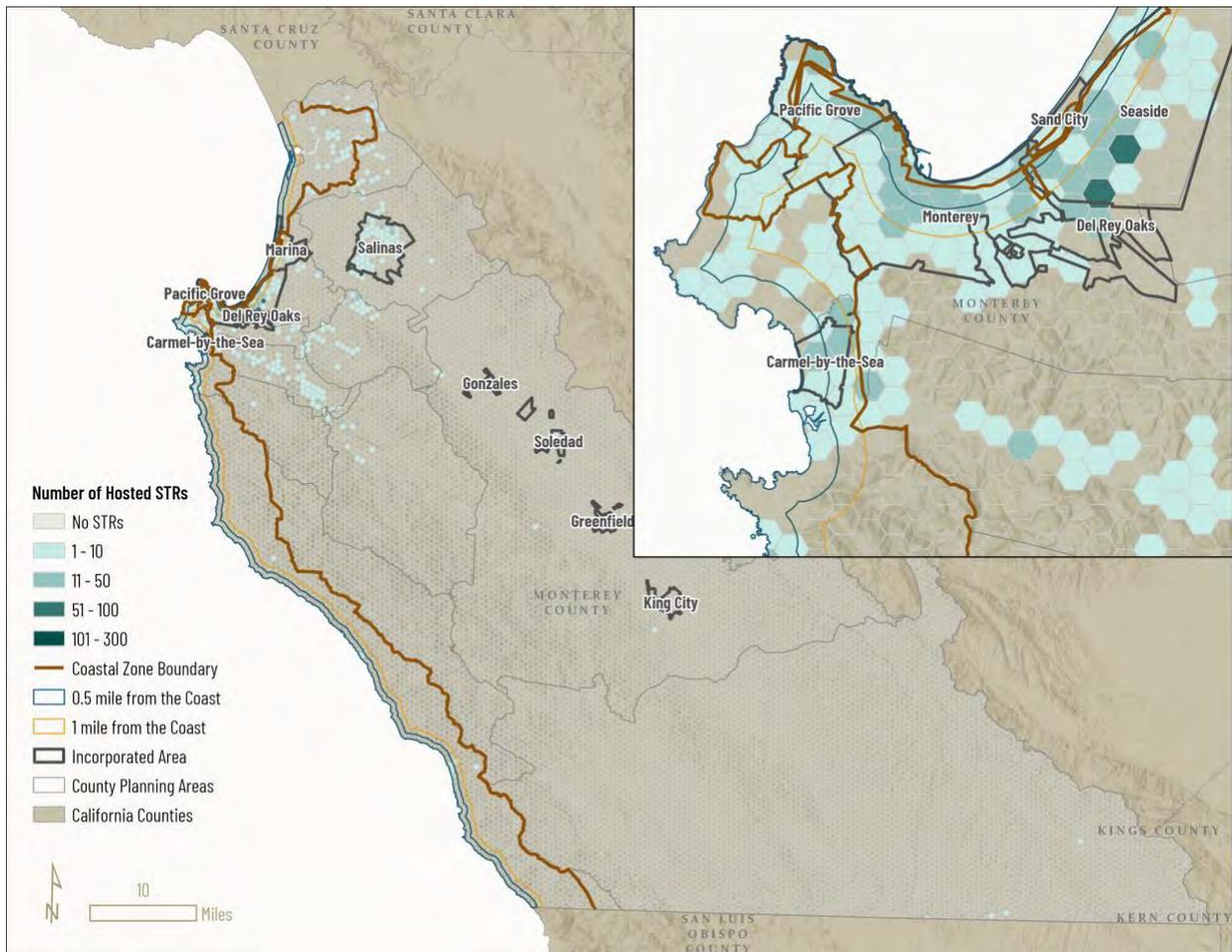
Map A1 below shows domestic visitation to Monterey County coastal areas by zip code. As the map depicts, there is widespread nationwide demand to visit the Monterey County coast. However, the immediate area (pink) contributes the greatest proportion of visitors, over 500,000 per year on average. The nearby counties (brown) similarly contribute a significant share of visitors. While these visitors are unlikely to stay overnight, due to their proximity, the Placer.ai data shows significant demand for visitation from those traveling much further. However, Placer.ai data do not capture demand for non-coastal attractions in Monterey County, such as golf, car shows, Cannery Row, or the Monterey Bay Aquarium.



Map A1: Domestic Visitors to Monterey County's Coast by Zip Code, 2018-2024.

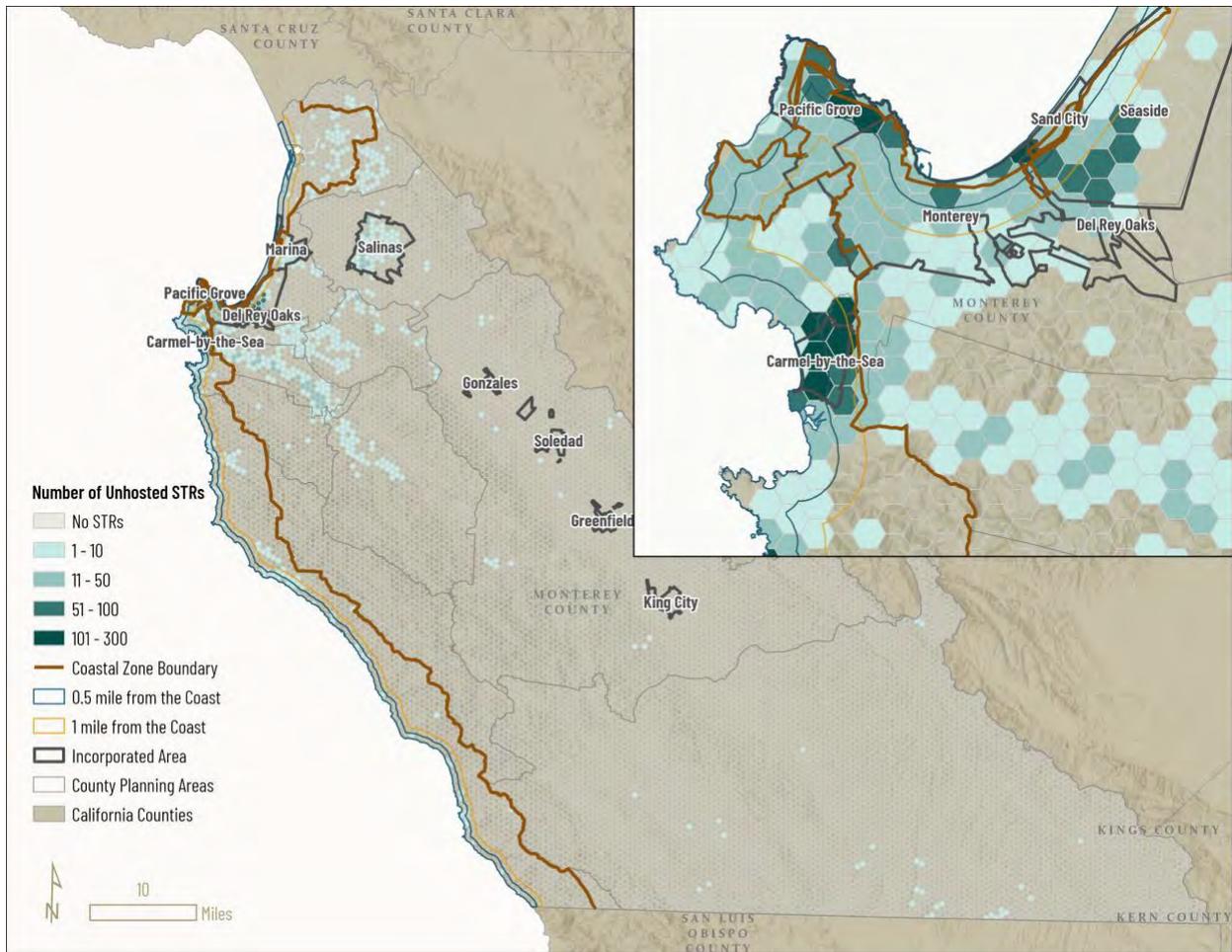
This map displays the total number of visits to the Monterey County coastline by U.S. residents, aggregated by zip code of origin over the 2018-2024 period. The strongest concentrations of visitation are from within California, particularly from the San Francisco Bay Area, Central Valley, and Southern California. While national in scope, visitation intensity drops significantly with distance from the West Coast. Zip codes shaded in darker colors represent the highest volumes of travel, with some areas contributing over 150,000 visits.

Appendix B: Hosted and Unhosted STRs



Map B1: Hosted Short-Term Rental Distribution in Monterey County: 0.25 Mile Grid.

The map displays the distribution of hosted short-term rental (STR) properties, defined as those where the operator resides on-site, aggregated within a 0.25 mile (1,320 foot) hexagonal grid across Monterey County. The California Coastal Zone boundary and coastal proximity corridors at 0.5 mile and 1-mile distances from the shoreline are included for reference. Patterns of hosted STR concentrations are especially evident on the Monterey Peninsula and along selected coastal communities, providing important context for understanding the role of hosted rentals in supporting coastal access and neighborhood-scale visitor accommodations.



Map B2: Unhosted Short-Term Rental Distribution in Monterey County: 0.25 Mile Grid.

The map shows the distribution of unhosted short-term rental (STR) properties, defined as entire-unit rentals where no operator resides on-site, aggregated within a 0.25 mile (1,320 foot) hexagonal grid across Monterey County. The California Coastal Zone boundary and coastal proximity corridors at 0.5 mile and 1-mile distances from the shoreline are included for reference. The Monterey Peninsula and selected coastal areas display notable clusters of unhosted STRs, providing insight into the spatial patterns of full-unit visitor accommodations and their relationship to coastal access and land use patterns.

Appendix C: Detailed STR Class Breakdown by Coastal Proximity

		Number of Properties	Percent of Properties	Total Bedrooms	Percent of Bedrooms	Total Guests	Percent of Guests
Within 0.5-mile corridor & in the Coastal Zone		3,026	34%	6,354	35%	15,364	35%
	budget	398	13%	827	13%	1,898	12%
	economy	387	13%	784	12%	1,775	12%
	luxury	772	26%	1,654	26%	4,261	28%
	midscale	442	15%	964	15%	2,217	14%
	upscale	537	18%	1,154	18%	2,709	18%
	unknown	490	16%	971	15%	2,504	16%
Within 1-mile corridor & Coastal Zone		1,791	20%	3,646	20%	8,390	19%
	budget	313	17%	663	18%	1,424	17%
	economy	291	16%	527	14%	1,233	15%
	luxury	331	18%	680	19%	1,572	19%
	midscale	280	16%	572	16%	1,286	15%
	upscale	270	15%	580	16%	1,299	15%
	unknown	306	17%	624	17%	1,576	19%
In the Coastal Zone but not within 1 mile of the coast		532	6%	1,074	6%	2,602	6%
	budget	101	19%	174	16%	384	15%
	economy	70	13%	148	14%	381	15%
	luxury	110	21%	224	21%	566	22%
	midscale	81	15%	167	16%	386	15%
	upscale	105	20%	235	22%	571	22%
	unknown	65	12%	126	12%	314	12%
Outside of the Coastal Zone & corridors		3,514	40%	6,983	39%	17,146	39%
	budget	893	25%	1,576	23%	3,747	22%
	economy	705	20%	1,345	19%	3,261	19%
	luxury	399	11%	980	14%	2,455	14%
	midscale	616	18%	1,169	17%	3,006	18%
	upscale	457	13%	995	14%	2,531	15%
	unknown	444	13%	918	13%	2,146	13%
Total		8,863	100%	18,057	100%	43,502	100%

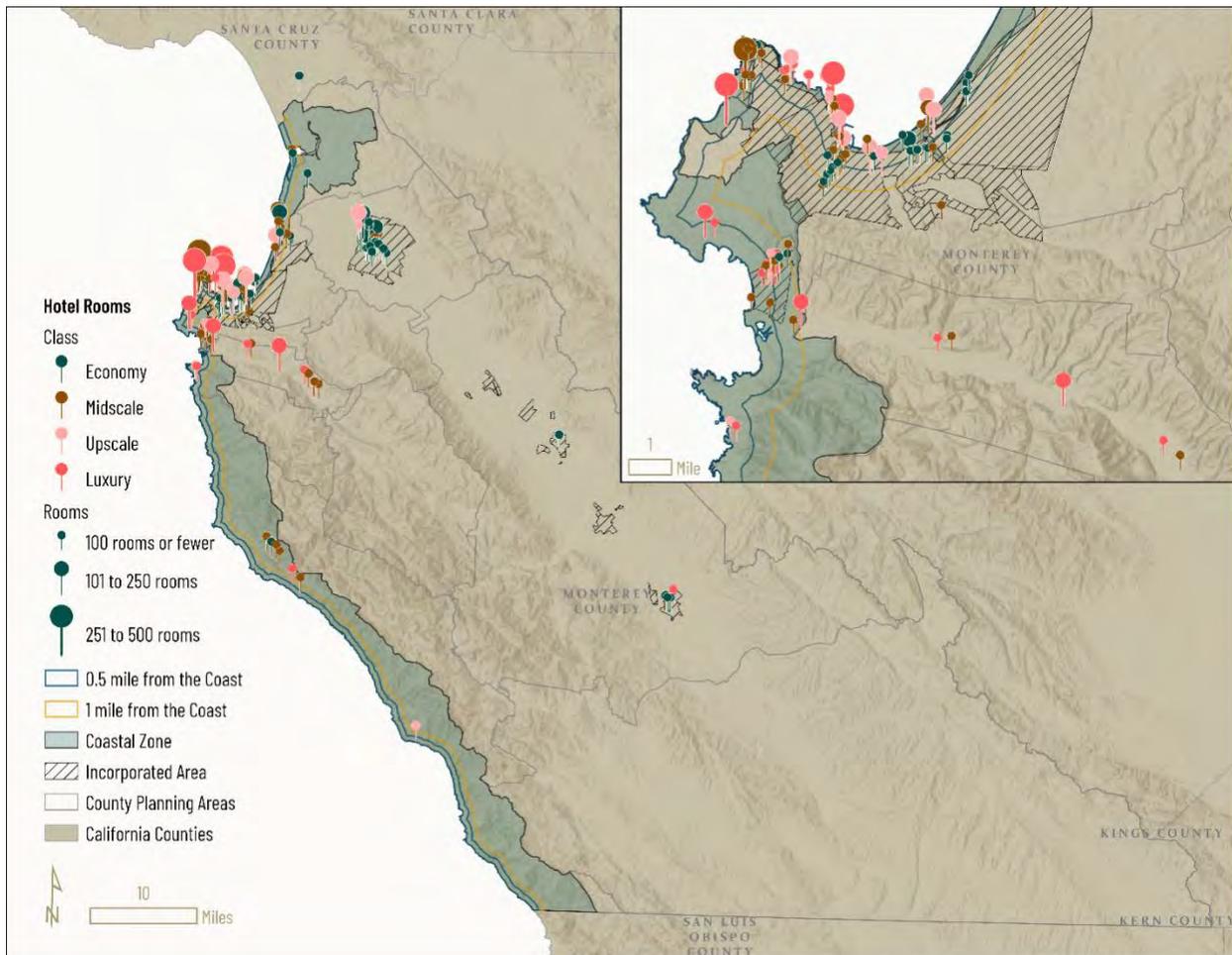
Table C1: Distribution of Short-Term Rentals by Coastal Proximity and Market Class in Monterey County. This table summarizes the number of short-term rental (STR) properties, total bedrooms, and estimated guest capacity across four spatial categories:

- (1) within the 0.5-mile proximity corridor and inside the Coastal Zone,
- (2) within the 1-mile proximity corridor and inside the Coastal Zone,

- (3) inside the Coastal Zone but beyond 1 mile from the shoreline, and*
- (4) outside both the Coastal Zone and defined proximity corridors.*

STRs are also classified by market segment (budget, economy, midscale, upscale, luxury, and unknown). The proximity corridor framework provides a consistent basis for comparing lodging availability in high-demand coastal areas. Approximately 34% of STRs and 35% of guest capacity are located within the 0.5-mile proximity corridor. An additional 20% fall within the broader 1-mile corridor. Only 6% are in inland portions of the Coastal Zone beyond 1 mile, while 40% of STRs are located outside the Coastal Zone and both proximity corridors. This distribution highlights the spatial concentration of STRs near the coast and the range of accommodation types available at varying distances and price points.

Appendix D: Hotel Distribution in Monterey County



Map D1: Hotel Properties by Class and Room Count in Monterey County with Coastal Zone and Proximity Indicators.

This map displays individual hotel properties symbolized by lodging class (economy, midscale, upscale, luxury) and scaled by the total number of rooms per facility. Larger markers represent higher-capacity hotels, grouped into three categories: 100 rooms or fewer, 101 to 250 rooms, and 251 to 500 rooms. The California Coastal Zone boundary, along with the 0.5-mile and 1-mile coastal proximity corridors, is shown to contextualize spatial patterns.

Hotels are strongly concentrated along the Monterey Peninsula and north coast, with a significant share of higher-end and larger-capacity properties located within the Coastal Zone and incorporated areas. Hotels located in non-coastal areas are generally smaller and more likely to fall into the economy or midscale categories. This spatial arrangement reinforces the role of coastal hotels in Monterey County’s visitor-serving economy and highlights disparities in lodging class and scale between coastal and non-coastal areas.

Appendix E: Detailed Monthly STR Pricing

Table E1: Monthly Summary of Short-Term Rental Pricing, Occupancy, and Per-Guest Costs in Monterey County (2018–2024).

This table presents monthly averages for all short-term rentals (STRs) in Monterey County from 2018 to 2024 (excluding 2020). It includes average daily rate (ADR), average occupancy rate, average guest accommodation capacity, and average daily rate per guest. The data are reported separately for STRs located within the California Coastal Zone and those in non-coastal areas. These comparisons highlight seasonal variation in pricing and occupancy, as well as spatial differences in affordability between coastal and non-coastal STRs.

Month	Zone	Number of Active Properties (All)	Average Daily Rate (All)	Average Occupancy Rate (All)	Average Guests Accommodation Capacity (All)	Average Daily Rate Per Guest
1	Coastal Zone	4,249	\$418.03	38%	5	\$84
1	Not in the Coastal Zone	5,635	\$261.10	37%	5	\$55
2	Coastal Zone	4,134	\$451.32	42%	5	\$91
2	Not in the Coastal Zone	5,435	\$272.14	41%	5	\$59
3	Coastal Zone	4,273	\$430.08	46%	5	\$85
3	Not in the Coastal Zone	5,595	\$272.67	46%	5	\$59
4	Coastal Zone	4,304	\$468.76	52%	5	\$92
4	Not in the Coastal Zone	5,795	\$310.46	53%	5	\$65
5	Coastal Zone	4,453	\$480.04	50%	5	\$95
5	Not in the Coastal Zone	5,997	\$319.05	52%	5	\$68
6	Coastal Zone	4,584	\$529.76	56%	5	\$105
6	Not in the Coastal Zone	6,417	\$350.26	58%	5	\$73
7	Coastal Zone	4,511	\$546.64	64%	5	\$106
7	Not in the Coastal Zone	6,251	\$360.78	67%	5	\$75
8	Coastal Zone	4,836	\$610.18	61%	5	\$120
8	Not in the Coastal Zone	6,808	\$400.87	63%	5	\$84
9	Coastal Zone	4,572	\$525.52	54%	5	\$103
9	Not in the Coastal Zone	6,354	\$346.66	55%	5	\$74
10	Coastal Zone	4,481	\$501.92	49%	5	\$99
10	Not in the Coastal Zone	6,166	\$310.75	48%	5	\$67
11	Coastal Zone	4,442	\$501.88	45%	5	\$97
11	Not in the Coastal Zone	6,091	\$316.96	44%	5	\$66
12	Coastal Zone	4,555	\$482.67	42%	5	\$92
12	Not in the Coastal Zone	6,255	\$296.84	42%	5	\$61
Average 2018-2024 (excluding 2020)			\$406.89	50%	5	\$82
Average Coastal Zone			\$495.57	50%	5	\$97
Average Not in the Coastal Zone			\$318.21	50%	5	\$67

Table E2: Monthly Summary of One-Bedroom Short-Term Rentals by Coastal Location in Monterey County (2018–2024).

This table provides a monthly breakdown of one-bedroom STRs, comparing those located within the California Coastal Zone to those in non-coastal areas. Key variables include ADR, occupancy rate, average guest capacity, and per-guest cost. Coastal STRs show consistently higher ADRs, and per-guest rates compared to non-coastal units, although occupancy rates remain similar.

Across all one-bedroom STRs, Coastal Zone properties average \$95 per guest per night, while non-coastal units average \$63.

These differences underscore the importance of spatial context in evaluating the affordability of smaller STR units.

Month	Zone	Number of Active Properties (Only One Bedroom)	Average Daily Rate (One Bedroom Only)	Average Occupancy Rate (Only One Bedroom)	Average Guest Accommodation Capacity for One Bedroom STRs	Average Daily Rate Per Guest
1	Coastal Zone	1,272	\$214.10	39%	2.6	\$82
1	Non-coastal	2,291	\$128.25	38%	2.5	\$52
2	Coastal Zone	1,254	\$240.84	45%	2.6	\$92
2	Non-coastal	2,190	\$144.57	43%	2.5	\$58
3	Coastal Zone	1,272	\$236.37	48%	2.6	\$90
3	Non-coastal	2,287	\$139.00	47%	2.5	\$56
4	Coastal Zone	1,280	\$248.48	54%	2.6	\$95
4	Non-coastal	2,341	\$157.42	55%	2.5	\$63
5	Coastal Zone	1,317	\$248.52	52%	2.6	\$95
5	Non-coastal	2,437	\$164.46	55%	2.5	\$66
6	Coastal Zone	1,385	\$255.28	55%	2.6	\$97
6	Non-coastal	2,567	\$168.57	60%	2.5	\$67
7	Coastal Zone	1,347	\$269.14	61%	2.6	\$102
7	Non-coastal	2,559	\$178.89	67%	2.5	\$71
8	Coastal Zone	1,480	\$294.20	60%	2.7	\$110
8	Non-coastal	2,770	\$193.91	63%	2.5	\$76
9	Coastal Zone	1,371	\$265.84	55%	2.6	\$101
9	Non-coastal	2,660	\$173.85	58%	2.5	\$68
10	Coastal Zone	1,336	\$252.19	50%	2.6	\$96
10	Non-coastal	2,523	\$161.95	51%	2.5	\$64
11	Coastal Zone	1,331	\$237.71	45%	2.7	\$90
11	Non-coastal	2,481	\$151.12	44%	2.5	\$60
12	Coastal Zone	1,356	\$231.13	42%	2.7	\$87
12	Non-coastal	2,556	\$136.43	42%	2.5	\$54
Average 2018-2024 (excluding 2020)			\$203.84	51%	2.6	\$79
Average Coastal Zone			\$249.48	51%	2.6	\$95
Average Non-Coastal			\$158.20	52%	2.5	\$63

Attachment B

MEMO

To **Marne Sussman, Holland & Knight, LLP**
 From **Eric C. Lu, Sarah Manzano, and Brent Ferren**
 Subject **Environmental Analysis of Short-Term Rental Regulation in Monterey County**

Ramboll Americas Engineering Solutions, Inc. (Ramboll) evaluated potential air quality, greenhouse gas (GHG), energy and noise environmental impacts of additional restrictions on short-term rentals (STR) in the coastal areas of the unincorporated County of Monterey, California (“Monterey”). As discussed throughout this memo, Ramboll found that the restrictions of STRs in this area has the potential to increase emissions and noise that should be evaluated further. The increase in emissions and noise have the potential to cause a significant impact in relation to California Environmental Quality Act (CEQA).

June 6, 2025

Ramboll
 5 Park Plaza
 Suite 500
 Irvine, CA 92614

T +1 949 261 5151
 F +1 949 261 6202
www.ramboll.com

1 Overview

We understand that the Coastal Commission is evaluating the implementation of the County of Monterey’s restrictions on STRs in coastal zones of unincorporated Monterey County. We understand other cities within Monterey County already have restrictions in place, and these restrictions are already in place in areas of unincorporated Monterey County that are not in the coastal zones.

As a result of the proposed STR restrictions, individuals would be unable to enjoy the benefits of STRs within the coastal regions of Monterey County, which will increase demand for local hotels and STRs outside of the coastal region as the only option for short term stays in the area. As a result, individuals will be forced to travel greater distances to other commercial centers in the region to find available STRs and other options for available or affordable hotels, introducing additional vehicle miles traveled (VMT). In particular, the increased travel to and from hotels and STRs in the region because of the unavailability of STR in the coastal regions of Monterey County could increase emissions relative to Monterey Bay Air Resources District thresholds for criteria air pollutants (CAPs), with the potential to cause short-term and long-term health impacts to sensitive receptors, exceedances of applicable air quality standards, and inconsistencies with applicable air quality and climate plans, all of which create a fair argument of environmental impacts that would likely occur but have not been previously considered. The restrictions on STRs will also likely result in increased traffic congestion and noise impacts that require further study under CEQA.^{1, 2}

¹ Airbtics reports approximately 1,500 short-term rentals in Monterey, which is referenced throughout this analysis. However, conclusions herein are largely based on comparative impacts to the elimination of short-term rentals and are not dependent on the actual number of short term rentals in the area today.

² <https://app.airbtics.com/airbnb-data/United-States/CA/Monterey>. Accessed March 21, 2025.

2 Health Impacts from Criteria Pollutants and Greenhouse Gases

Criteria air pollutants (CAPs) are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive people from illness or discomfort. Pollutants of concern include ozone (O_3), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In addition to CAPs, GHGs which include but are not limited to carbon dioxide (CO_2), nitrous oxide (N_2O) and methane (CH_4) are also of environmental concern due to their role in climate change. Although not subject to ambient air quality standards, GHGs trap heat in the atmosphere and contribute to climate change, with far-reaching impacts on ecosystems, weather patterns, and human health.

The STR additional restrictions have the potential to increase emissions of these pollutants. The background on their health impacts are discussed in the following paragraphs.

Ozone

O_3 is a colorless gas that is formed in the atmosphere when volatile organic compounds (VOCs), sometimes referred to as reactive organic gases (ROGs), and oxides of nitrogen (NO_x) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of VOCs and NO_x , the precursors of O_3 , are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. Short-term exposures (lasting for a few hours) to high levels of O_3 can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

Nitrogen Oxides

Most NO_2 , like O_3 , is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_x and are major contributors to O_3 formation. The primary sources of NO, the precursor to NO_2 , include automobile exhaust and industrial sources. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere, causing reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis, and some increase in bronchitis in children (2 and 3 years old) has also been observed at concentrations below 0.3 parts per million by volume (ppm).

Carbon Monoxide

Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In high-traffic areas, such as along Highway 101 in Monterey County, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation under highly stable conditions at dusk. The

highest levels of CO typically occur during the colder months of the year when inversion conditions, where a layer of warm air sits atop cool air, are more frequent and can trap pollutants close to the ground. This effect may be expected to be more significant in coastal regions, as cool ocean air and relatively low seasonal variation develop strong and persistent inversions. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Sulfur Oxides

Sulfur Dioxide (SO₂) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. The main sources of SO₂ are coal and oil used in power plants and industries; as such, the highest levels of SO₂ are generally found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits placed on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel.

Particulate Matter

Particulate matter (PM) pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM_{2.5} and PM₁₀ represent fractions of particulate matter. Fine particulate matter, or PM_{2.5}, is roughly 1/28 the diameter of a human hair. PM_{2.5} results from fuel combustion (e.g., motor vehicles, power generation, and industrial facilities), residential fireplaces, and woodstoves. In addition, PM_{2.5} can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs. Inhalable or coarse particulate matter, or PM₁₀, is about one-seventh the thickness of a human hair. Major sources of PM₁₀ include dust stirred up by vehicles traveling on roads; crushing or grinding operations; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; exhaust from mobile vehicles; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the bloodstream, causing damage elsewhere in the body. Additionally, these substances can transport absorbed gases, such as chlorides or ammonium, into the lungs, also causing injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Greenhouse Gases

Greenhouse gases are gases that trap heat in the Earth's atmosphere, contributing to the greenhouse effect and climate change. Unlike criteria air pollutants, GHGs are not directly associated with respiratory or toxic health effects at ambient levels but are significant due to their long-term impacts on global climate systems and human health through secondary effects such as increased heat waves, wildfires, and sea level rise.

The primary GHGs of concern include CO₂, CH₄, N₂O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Among these, CO₂ is the most prevalent, primarily emitted through the combustion of fossil fuels for transportation, electricity generation, and other industrial processes. CH₄ is released from landfills, agriculture (particularly from livestock), and oil and gas operations, while N₂O emissions are largely associated with agricultural activities and combustion.

Transportation is a major source of GHG emissions in California, contributing significantly to statewide CO₂ levels. Increased VMT may contribute to a rise in regional GHG emissions. Although GHGs disperse globally, local increases in VMT contribute to the broader cumulative impacts of climate change.

While GHGs do not cause immediate local air quality issues in the way criteria pollutants do, their long-term effects include rising temperatures, changing precipitation patterns, reduced snowpack, and increased frequency and intensity of extreme weather events. These changes pose risks to both human and ecological health, infrastructure, and regional economic stability, especially in areas like coastal California that are vulnerable to sea-level rise and wildfire.

3 Further STR Restrictions Will Increase Air Pollutant Emissions and Greenhouse Gas Emissions

There are approximately 1,500 active Airbnb listings in Monterey County.³ While the available statistic reflects the total number of listings in Monterey County as a whole, it serves as a useful proxy for understanding trends in the short term rental market in the coastal unincorporated areas, which are included in the county total. Elimination of these Airbnb rentals and other short-term rentals in the coastal areas of Monterey County and the corresponding increase in guests at surrounding hotels and farther STRs would result in potential guests travelling farther to their lodging from their daily destinations since they would have fewer options to stay as close as possible to daily destinations during their stay. Guests that would have stayed at these coastal STRs may stay at hotels in the area. Alternatively, if the guest wants to stay at an STR, the guest may drive farther to an STR in an area with less restrictions.

In addition, the number of trips taken by guests to and from their site of accommodation would be higher for hotels than for short-term rentals, as evidenced by Institute of Transportation Engineers (ITE), introducing additional vehicle miles traveled. Recreational Homes (ITE Land Use Code 260) have an average weekday trip generation rate of 3.55 trips per day while the Hotel land use (ITE Land Use 310) has 7.99 trips per day. This increase in trips may be due to the need to leave the hotel for amenities, such as food, and increased worker trips.

The increase in mobile emissions from staying at available STRs near destinations compared to hotels or other farther STRs is presented below in Table 1. Based on publicly available statistics on the current Airbnb listings across Monterey County, the average capacity per STR is 4.8 people with approximately 1,500 active Airbnb listings.⁴ This equates to a service population of roughly 7,200 people. While these figures represent the entire county—including both incorporated and unincorporated areas—they provide a general estimate of potential displacement. If STRs were further restricted in the unincorporated area, and assuming similar capacity patterns, it would require approximately 2,400 hotel rooms (assuming 3 people per room) to accommodate a comparable number of visitors.

³ <https://app.airbtics.com/airbnb-data/United-States/CA/Monterey>. Accessed March 21, 2025.

⁴ <https://app.airbtics.com/airbnb-data/United-States/CA/Monterey>. Accessed March 21, 2025.

For the purpose of this comparison, half of existing STR users are assumed to stay at hotels and the other half are assumed to stay at other STRs, likely farther from their destination due to the reduction in availability.

The number of peak daily trips was estimated using the ITE trip rates for recreational homes and hotel land uses and the number of STRs and hotel rooms required to serve the same population.^{5,6} The number of daily miles traveled for the existing STRs were based on CalEEMod⁷ default assumptions. Visitors that would stay at farther STRs as a result of the STR restrictions are assumed to travel 5 miles longer since guests might have to stay farther from daily destinations.⁸ Visitors that would stay at hotels as a result of the STR restrictions are assumed to travel the same distance as the existing STR. These assumptions were used to determine daily mobile emissions.

Mobile emissions from visitors staying at a hotel would generate up to 294 percent criteria air pollutant emissions and GHGs compared to visitors staying at an STR.⁹ Therefore, the increase in restrictions has the potential to considerably increase emissions in the area. The increase in VMT and greenhouse gas emissions is directly inconsistent with regional and state goals to reduce VMT and greenhouse gas emissions from vehicle trips. Additional calculation details can be found in Appendix A.

Table 1. Emissions Increase due to Additional VMT

Criteria Air Pollutant and Greenhouse Gas	Percent of daily mobile emissions from STR to hotel to serve the same population
VOC	292%
NO _x	294%
CO	293%
SO _x	294%
PM ₁₀	294%
PM _{2.5}	294%
GHG (CO ₂ e)	294%

⁵ Institute of Transportation Engineers (ITE). 2021. Trip Generation Manual, 11th Edition.

⁶ Population estimates were calculated based on an average STR capacity of 4.8 occupants, as indicated by Airbnb-specific data for Monterey County. For hotels, an average room capacity of 3 guests was assumed, reflecting typical room configurations that accommodate either 2 or 4 people.

⁷ CalEEMod is a land use emissions calculator developed for the California Air Pollution Control Officers Association (CAPCOA) to estimate GHG and criteria air pollutant emissions associated with both construction and operational activities from land use projects. CalEEMod provides detailed emissions estimates and default data for evaluating emissions based on region. It encompasses emissions from a variety of sources including vehicle traffic, energy use, area sources, waste disposal, and water use along with construction equipment.

⁸ Five miles is a conservative estimate based on the fact that the Coastal Commission jurisdiction expands up to 5 miles inland. Therefore, if a guest was trying to stay at a coastal STR that would be eliminated, they would need to travel at least 5 miles to find alternative accommodations. This is conservative because in reality, many guests may be forced to travel to other cities such as Salinas, Seaside, or Watsonville, which are more than 5 miles from popular tourist destinations in Monterey County.

⁹ This percent increase is independent of the number of short-term rentals in Monterey County. The number of short-term rentals and population are provided for illustrative purposes only.

4 Further STR Restrictions Will Disproportionally Burden Environmental Justice Communities

Existing environmental and socioeconomic disparities across Monterey County leave certain communities particularly vulnerable to the cumulative impacts of land use and policy changes. The proposed STR restriction in the coastal areas of the unincorporated County of Monterey raises notable environmental justice concerns, particularly given the County's existing patterns of disparate burden from regional pollution and localized traffic-related air quality impacts. Displacement of visitors from STRs could further concentrate visitor activity in areas already experiencing elevated levels of pollution, noise exposure, and socioeconomic vulnerability. This concentration of short-term visitor activity into or through those areas would lead to increased impacts to those communities based on the usage of alternative lodging options and the associated increased vehicle travel to reach these alternative lodging options.

Existing STRs are distributed across a range of coastal and near-coastal communities, primarily along the coastal Highway 1 corridor and in traditional tourist destinations (e.g., Monterey Bay, Big Sur). Smaller numbers of STRs also exist inland and in less densely populated residential areas. While STRs are dispersed throughout the unincorporated areas of Monterey County, demand is primarily driven by proximity to coastal attractions, scenic areas, and established tourist corridors. As a result, visitor displacement associated with STR restrictions would be expected to concentrate most heavily in coastal and near-coastal areas where lodging demand is highest.

The existing hotels are predominately located in tourist-oriented coastal communities of the Carmel Highlands, Carmel-By-The-Sea, Pacific Grove, Monterey, Seaside, Marina, Salinas, and Big Sur and the nearby unincorporated areas of Monterey County. The tourist-attracting areas of Pacific Grove, Monterey, Seaside, Marina, Salinas, and the portion of Monterey County immediately south of Watsonville¹⁰ show elevated burden according to the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen (CalEnviroScreen 4.0) data.^{11,12}

CalEnviroScreen is a statewide mapping tool developed to identify California communities most impacted by pollution sources and other environmental health risks to identify vulnerability to adverse health effects from those sources. CalEnviroScreen takes into account environmental and socioeconomic factors to develop a percentile of burden across the State of California. Factors include indicators of pollution burden (e.g., ozone, traffic, pesticides, drinking water) and population characteristics (e.g., asthma, cardiovascular disease, education, poverty). These metrics are scored and weighted to produce an overall CalEnviroScreen score, which can be viewed as individual contributions of pollution burden and population characteristic scores.

Figure 1 shows the overall cumulative burden rankings for northern Monterey County, highlighting the concentration of highly burdened tracts in Monterey/Seaside-Salinas-Watsonville region in coastal Monterey County. This area includes multiple census tracts ranked in the 80th percentile and above (i.e., are within the top 20%) for the CalEnviroScreen overall burden ranking (Tract 6053000900 with 84th percentile as the maximum). These high rankings indicate that residents in these areas

¹⁰ The portion of Monterey County immediately south of Watsonville is referred in this section as Monterey/Seaside-Salinas-Watsonville.

¹¹ While not in Monterey County, the city of Watsonville borders the north boundary of Monterey County and is also an area of both concentrated hotels and elevated disparity indicators, which could be exacerbated as short-term visitors consider local hotel options.

¹² OEHHA. CalEnviroScreen 4.0. May 2023. Available at: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>.

experience significantly greater exposure to pollution and other environmental and health risk factors when compared to most other communities in the state. This is highlighted in the highly agricultural Watsonville and Salinas tracts, and tracts between the two cities. CalEnviroScreen ranks multiple tracts in this area with the highest ranking (98th-100th percentiles) for pesticides, drinking water contaminants, and impaired water. Vehicle traffic for individuals and goods movement already impacts these heavily-burdened communities. For example, Census Tract 6053013100 (Monterey) is ranked in the 80th percentile for elevated traffic impacts and tracts burdened by Diesel Particulate Matter (DPM, primarily associated with diesel vehicle traffic) exposure (Census Tract 6087110400 (Watsonville) in the 86th percentile and Census Tract 6053001802 (Salinas) in the 83rd percentile) are concentrated in the same local corridor of Monterey-Seaside, Salinas, and Watsonville.

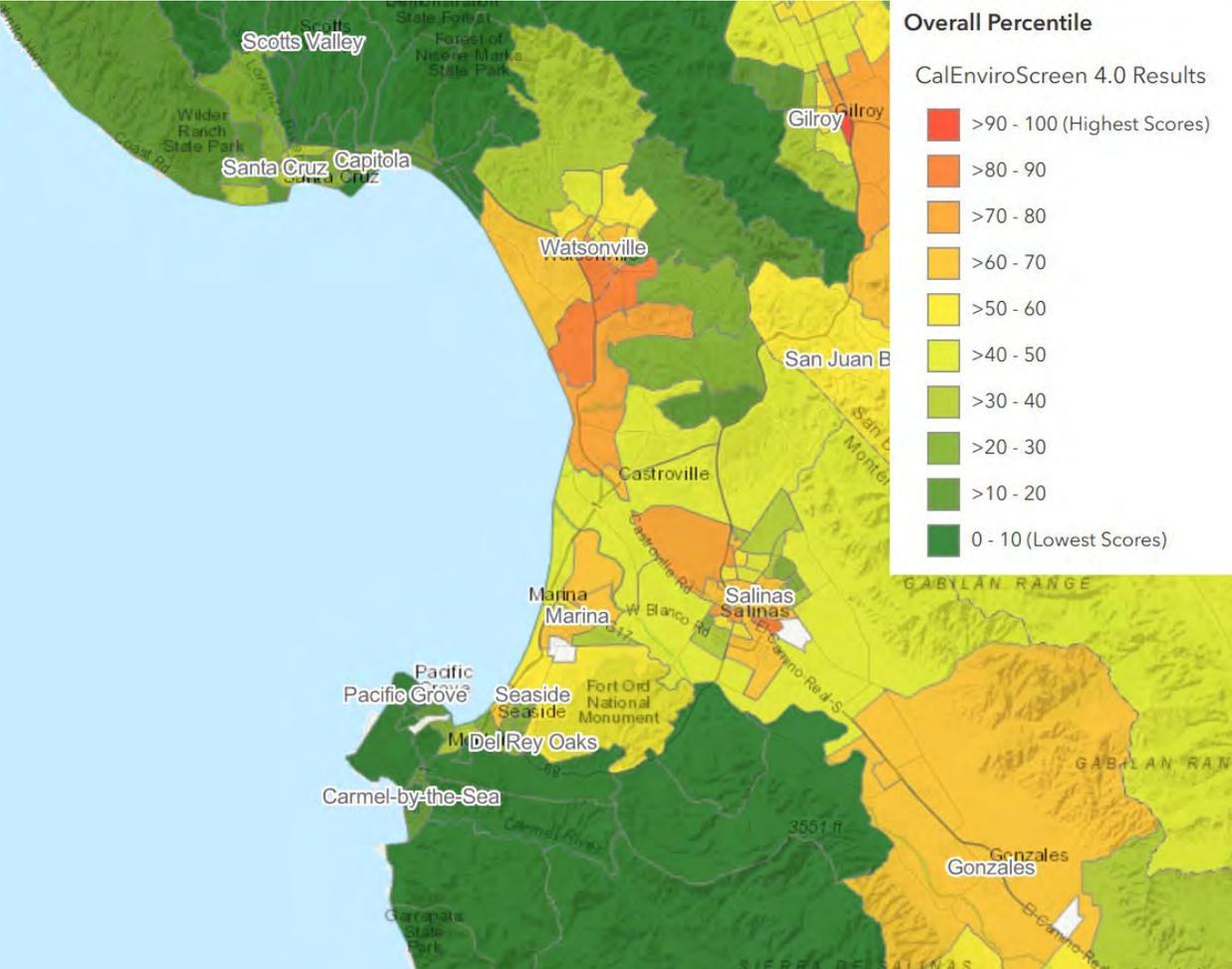


Figure 1. North Monterey County, CA Overall Percentile of Exposure and Burden.¹³

Marina, Salinas, and Watsonville-Pajaro Valley are also designated as Senate Bill (SB) 535 Disadvantaged Communities. Under SB 535, communities are designated as disadvantaged based primarily on CalEnviroScreen rankings, with census tracts in the top 25% statewide for cumulative pollution burden and socioeconomic vulnerability qualifying for this designation. SB 535 Communities

¹³ OEHA. CalEnviroScreen 4.0. May 2023. Available at: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>.

are among the most disadvantaged in the state and are specifically targeted for state investment in order to improve health, quality of life, and economic opportunity.

Restrictions on coastal STRs will exacerbate these burdens. The restrictions may require visitors to travel longer distances through these same communities to reach available lodging options or may require visitors to travel through these communities to reach their alternative lodging options that would have otherwise stayed closer to their destination if STRs were available. This additional vehicle traffic increases localized traffic congestion and DPM exposure, compounding the existing burdens in these areas.

In contrast, the southern and western portions of unincorporated Monterey County exhibit significantly lower overall environmental burdens. Coastal areas to the south, such as the Big Sur region, generally rank among the least burdened tracts in CalEnviroScreen, reflecting lower levels of cumulative pollution exposure and fewer socioeconomic vulnerabilities. Similarly, the more inland areas of the county are characterized by limited developed, greater distance from the coast and major coastal tourist areas, and fewer identified environmental health risk factors. While these areas are not considered environmentally overburdened under current screening tools, their limited infrastructure may similarly make them less able to absorb significant increases in visitor activity without experiencing larger localized impacts.

A significant portion of the unincorporated areas near and within the areas of coastal Monterey County subject to the proposed STR restrictions have more limited infrastructure and public services as compared to more urban regions. As a result, displaced visitor traffic from STR restrictions could more easily and more significantly strain local transportation systems and infrastructure, and increase localized congestion, pollutant, and noise exposure, even with relatively modest increases in short-term visitor and associated vehicle activity. These potential infrastructure impacts are further complicated by affordability considerations. While areas like Carmel-By-The-Sea and surrounding unincorporated areas rank in the lowest 10% in the state by CalEnviroScreen, they also tend to be among the most expensive in the region, limiting their accessibility for visitors seeking affordable accommodations. Visitors displaced from STRs in more affordable coastal areas may be driven to alternative inland options, potentially exacerbating existing environmental burdens in those regions.

Figure 2 shows the impacts of traffic alone, as expressed in the CalEnviroScreen reported traffic proximity. Traffic proximity is measured as the volume of vehicles traveling near a census tract divided by the distance to the tract, resulting in a percentile ranking that reflects a community's relative exposure to vehicle traffic exposure (i.e., air pollutant emissions, noise). The data included in Figure 2 demonstrates that the Monterey/Seaside-Salinas-Watsonsville tracts, which include areas where hotels are primarily located, have some of the highest traffic proximity scores in the region. As visitors displaced by the STR restriction find accommodations in these tracts or are forced to travel through them, additional VMT and lodging demand would likely intensify localized traffic congestion, roadway emissions, and associated noise pollution, compounding the existing exposure burdens faced in these communities. Because these communities already exhibit high traffic burden scores and relatively limited traffic infrastructure, even modest increases in visitor traffic could have a disproportionately large impact based on the low capacity of local infrastructure to accommodate traffic increases. In comparison, other coastal areas with similar CalEnviroScreen traffic proximity scores, such as Los Angeles County's Huntington Beach, are more densely developed with supporting infrastructure. As a result, in less urbanized areas like coastal Monterey County, a similar increase in traffic volume can have a more significant impact on local residents and infrastructure in communities with less capacity to absorb additional strain. These already traffic-exposure overburdened tracts risk further concentration of traffic from increased hotel use and the potential development of new hotels.

Therefore, the congestion and traffic density increases may be more impactful to this already overburdened area.

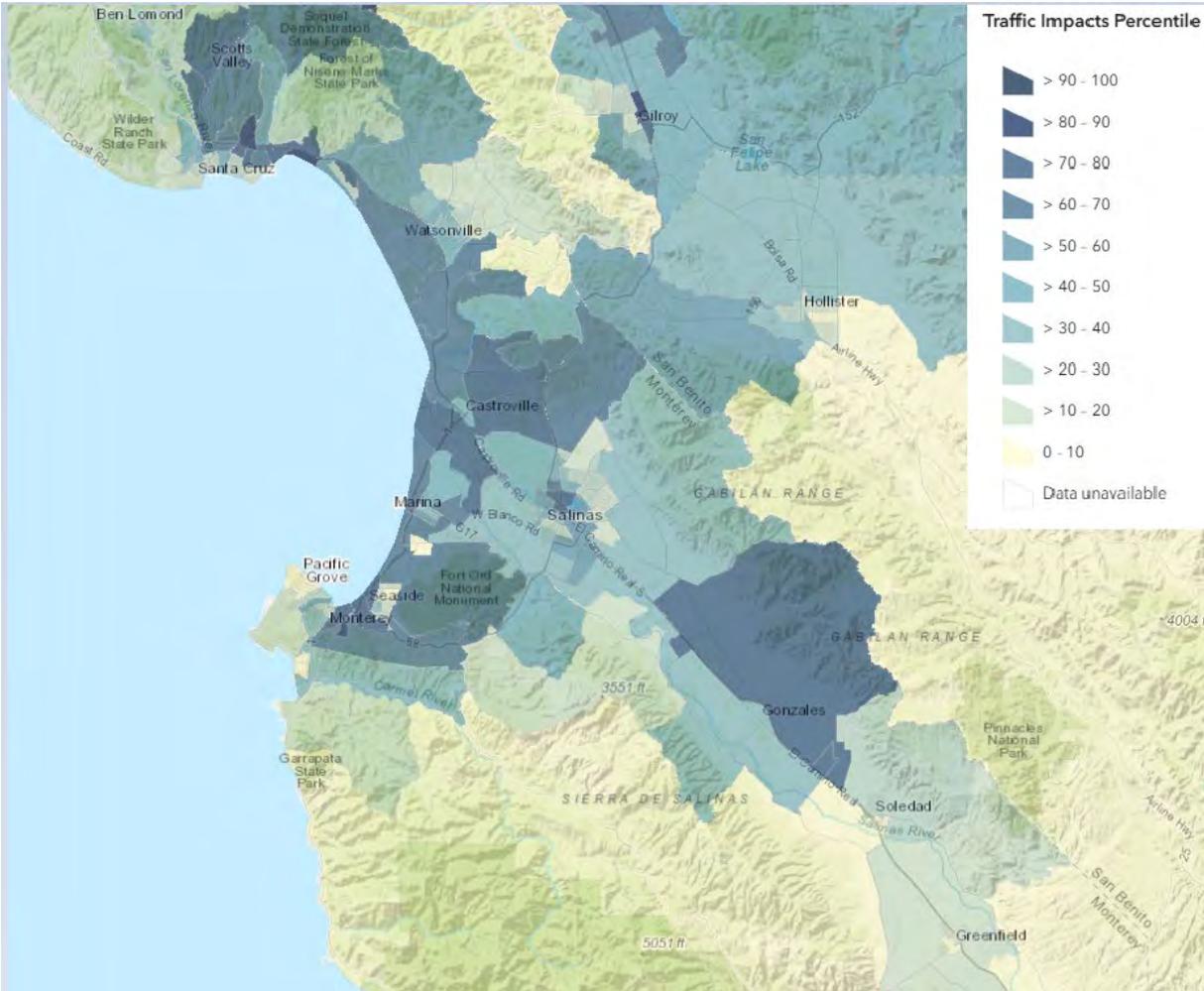


Figure 2. North Monterey County, CA. Traffic Impacts Percentile).¹⁴

The proposed STR restrictions could shift visitor accommodations and regular transit from STRs in lower-burdened, dispersed residential areas to inland STRs and concentrated coastal hotel zones in the Monterey/Seaside-Salinas-Watsonville corridor. These coastal areas already experience elevated traffic, noise, and pollutant levels due to existing population centers, hotels, and tourism-serving infrastructure. Concentrating additional visitor activity in these zones could further intensify localized environmental exposures, increase disparities, and increase overall public health risks. The limited availability of affordable accommodations in coastal areas, where lodging costs tend to be significantly higher, may amplify these impacts as visitors are further displaced toward more affordable inland options. This shift could drive increased occupancy of lower-cost hotels and STRs in inland communities such as Marina, Salinas, and the Watsonville-Pajaro Valley, where cumulative environmental burdens are already elevated. As a result, displaced visitor activity could contribute to

¹⁴ OEHHA. CalEnviroScreen 4.0. May 2023. Available at: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>.

increased visitor VMT, exacerbating local traffic congestion, noise, and pollution exposure across both coastal and inland areas. Further, the construction of new hotels to accommodate displaced visitors could generate short-term emissions from construction activities and long-term operational emissions from newly developed facilities. Together, these changes could further contribute to respiratory and cardiovascular health risks in overburdened communities throughout northern and coastal Monterey County.

This analysis has primarily focused on the more densely populated, agriculturally reliant, and environmentally burdened areas of northern and coastal Monterey County; however, it is important to acknowledge that other coastal and near-coastal areas of the County were also reviewed for potential impacts due to the proposed STR restrictions. From an environmental justice standpoint, these areas generally exhibit minimal exposure risk. Screening tools including CalEnviroScreen do not identify trends in elevated pollution burdens or socioeconomic vulnerabilities. This is further aligned with the broader County's geography and resulting activity, as much of the County's coastal zone is defined by varied geography, low residential density, and limited transportation development, which comparatively constrain both the tourism and goods movement activities and resultant burdens. The absence of historical and current agricultural activity in these areas also distinguishes Southern coastal parts of the county from the more burdened tracts due to pesticide use and contamination, and vehicle emissions, are concentrated. As a result, while localized infrastructure strain could amplify the impacts of short-term visitor displacement and activity changes, the overall environmental justice risk for current STR-related displacement impacts to these regions of Monterey County is comparatively low relative to those identified in northern coastal and inland communities.

5 Further STR Restrictions Would Increase Energy Demands and Overall Environmental Impact of a Visitor Traveling to the Area

The proposed STR restrictions could cause visitors who would have otherwise stayed in STRs to stay in hotels, which consume more energy per person than STRs. Using CalEEMod, Ramboll modeled the operational GHG emissions of hotels and STRs for comparison. The single-family home CalEEMod land use type was used as a surrogate for STRs. Assuming an occupancy rate of 3 people per hotel room and 4.8 people per STR, hotels have much higher associated GHG emissions per person.¹⁵ It was found that hotels consume more electricity and natural gas per person than STRs, as shown in Table 2 and in the CalEEMod output in Appendix B.¹⁶

Table 2. Operational Energy Use per Person

Land Use	Electricity	Natural Gas
	kWh/yr/person	kBTU/yr/person
Hotel	2,989	12,500
Short Term Rentals	1,261	8,299
Percent Increase in Hotel Energy Use	137%	51%

¹⁵ Population estimates were calculated based on an average STR capacity of 4.8 occupants, as indicated by Airbnb-specific data for Monterey County. For hotels, an average room capacity of 3 guests was assumed, reflecting typical room configurations that accommodate either 2 or 4 people.

¹⁶ The CalEEMod analysis is based on 156 dwelling units, which is the amount of STRs that would accommodate the same number of people as a 250 room hotel. However, the energy use per person and percent increase in GHG emission is independent of the absolute number of short-term rentals in Monterey.

As a result of the increase in energy consumption when staying in a hotel instead of an STR, GHG emissions from energy consumption per person would increase by 19% percent.

Additionally, coastal STR restrictions will increase the overall environmental impact of a visitor traveling to the area due to water consumption and waste production. Hotel accommodations typically require more frequent towel and linen washing compared to STR accommodations. Hotels often use single-use items such as coffee filters, shampoos, and soap which result in a large amount of waste per room when compared to a STR, where single-use items are not needed. Additionally, most STRs are single family homes with recycling services and provide recycling bins. Hotels do not often provide recycling bins in addition to waste bins.

As mentioned above, hotels also tend to produce more VMT per person because visitors make more trips from their hotel to restaurants, stores, and other attractions compared to STRs, which results in additional emissions.

6 Further STR Restrictions Will Increase Fossil Fuel Usage

In addition, increased VMT would require greater reliance on fossil fuels to power vehicle trips. Even with California’s policies to shift the vehicle fleet towards cleaner cars and trucks, vehicle usage will continue to rely on gasoline for car and truck trips for years to come. The STR restrictions therefore results in greater reliance on fossil fuels, inconsistent with regional and state climate policy. The estimated fuel use is summarized in Table 3 and utilizes the same assumptions from Table 1. Additional calculation details can be found in Appendix A. ¹⁷

Table 3. Daily Mobile Fuel Consumption

Land Use	Gasoline	Diesel
	Gallons per day	Gallons per day
Short Term Rentals without Additional Restrictions	848	48
After Additional Restrictions	2,494	140
Percent Increase	194%	194%

7 Further STR Restrictions Could Concentrate Traffic Resulting in Potential Noise and Health Impacts

The potential additional restrictions of short-term rentals in the coastal regions of Monterey County could result in concentrated traffic on roadways, which could have noise and health impacts to the surrounding land uses. As described above, removing short term rentals as a means for lodging in the area would result in visitors needing to rely on hotels for their stay or traveling to other areas to stay at an STR. Currently, there are over 100 hotels located along Highway 1 near popular tourist destinations such as Seaside, Marina, Monterey, Pacific Grove, Carmel-By-the-Sea and Big Sur. It can be assumed that if more people will need to stay in hotels instead of STRs, then the traffic to this part of town would increase significantly as it is likely all of this traffic would be concentrated to the roadways surrounding the hotel zone area. Furthermore, if coastal STRs are eliminated, more vehicles would travel on Highway 1 to reach their other STRs farther away. Highway 1 is the main route to many tourist destinations in the County and in and out of the coastal areas. In comparison, traffic caused from visitors traveling to and from various STRs located throughout the City would result in

¹⁷ The fuel usage is based on 1,500 STRs in Monterey. However, the percent increase is independent of the number of short-term rentals in Monterey.

more diversified traffic patterns as all visitors are not driving to one area. Furthermore, a potential new hotel constructed to meet the demand as a result of the STRs restrictions would likely be constructed in the popular hotel zones, further concentrating traffic in these areas.

Health Risk Impacts from Traffic

Ramboll performed a preliminary analysis that quantified the health risks from traffic emissions in order to assess the impact that increased hotel use in Monterey County due to an increase in restrictions on STRs could cause. A typical roadway with approximately 30,000 average annual daily trips (AADT) results in an excess cancer risk of 40 in a million at a nearby residential receptor.^{18, 19, 20} According to ITE, hotels generate 7.99 trips per day per hotel room.²¹ MBARD has a CEQA threshold of significance for health impacts of 10 in a million. To remain below the MBARD thresholds, less than 7,560 vehicles per day could travel on Highway One as a result of the increased restrictions. This equates to about 950 hotel room stays or 594 STRs used in other areas.

There are currently an estimated 1,500 Airbnbs in Monterey County, with other STRs also available.²² While this figure reflects listings countywide, this analysis is focused specifically on the unincorporated areas, where the number of STRs is lower. However, the same general conclusions apply, as replacing even a portion of these STRs with hotel accommodations or more distant lodging would still result in increased traffic volumes that could exceed MBARD health risk significance thresholds. This scaling approach also does not take into account increased truck traffic associated with deliveries to a hotel that would not occur to an STR. Therefore, further restricting STRs in the coastal areas of the unincorporated County of Monterey could result in an increase in traffic on certain roadways that could be considered significant. If additional truck trips were taken into account, the number of hotel rooms that could cause an exceedance of the threshold of significance for cancer risk could be lower than 950 hotel rooms.

It could be assumed that similar trends to cancer risk based on near-roadway traffic exposure would be true for particulate matter and toxic air contaminant emissions.

Noise Impacts from Traffic

Ramboll evaluated whether a potential traffic volume increase could cause a traffic noise increase that is considered either substantial (per CEQA guidelines) or increases the ambient conditions to a level above the State of California General Plan Guidelines standard (60 dBA CNEL).

Traffic noise analyses require specific knowledge of existing and future traffic volumes and vehicle mixes as well as project-related traffic volumes and mixes. In this case, this information is currently unknown. However, Figure 3 shows the current (2022) exterior levels of noise created by cars, trucks, or trains traveling along roadways and rail lines in the County. The County's noise and land use compatibility standards, shown in Table N-1 of the General Plan Draft Environmental Impact Report

¹⁸ Health impacts obtained from Highway 152 from the Bay Area Air Quality Management District (BAAQMD) Mobile Source Screening tool at a distance of 100 feet from the roadway. This was used as a surrogate to estimate general health risks from only traffic. The traffic volume along this road was obtained from CalTrans.

¹⁹ Bay Area Air Quality Management District (BAAQMD). 2022. CEQA Roadway Screening Tool - Cancer Risk. Available at: <https://data.bayareametro.gov/Environment/CEQA-Roadway-Screening-Tool-Cancer-Risk/kz4a-ueki>

²⁰ CalTrans, Traffic Census Program. Available at: <https://dot.ca.gov/programs/traffic-operations/census>.

²¹ Institute of Transportation Engineers (ITE). 2021. Trip Generation Manual, 11th Edition.

²² <https://app.airbtics.com/airbnb-data/United-States/CA/Monterey>. Accessed March 21, 2025.

consider exterior levels above 65 dBA (CNEL) to be generally incompatible for residential and other noise-sensitive land uses.²³

If residential or other noise-sensitive areas within the County that are currently below the 60 dBA CNEL level experienced traffic volume increases, specifically due to an increased hotel demand resulting from the proposed STR restrictions, and the traffic volume increase caused the CNEL level to now exceed 60 dBA, the STR restrictions could be considered to have caused a significant impact.

The magnitude of a traffic noise increase is dependent on several factors including the traffic volume increase, the vehicle mix, and the local site conditions. Based on standard methodologies prescribed by the Federal Highway Administration (FHWA) and considering a vehicle mix typical of suburban/urban areas, traffic volume increases would be expected to result in the following traffic noise increases, as shown in Table 4.

Table 4. Noise Impact from Traffic Increase

Traffic Volume Increase	Potential Traffic Noise Increase
25%	1 dB
50%	2 dB
100%	3 dB

Project-specific detailed analysis, including a traffic analysis, would be required to further evaluate. Nonetheless, the volume increases listed below suggest the traffic increases likely necessary to increase the existing traffic noise conditions would need to be significant. Existing hotel stock is located along primary roadways and, as shown in Figure 3 below, in the areas surrounding the main roadways Highway One and 101 are either near or already above the noise standard of 60 dBA.²⁴ Therefore, adding additional traffic to this area due to the shift to hotels as a result of the STR restrictions or the addition of new hotels to the area has the potential to exacerbate the existing noise impacts or create a new noise impact. Therefore, this should be studied in more detail.

²³ Monterey County. (2008). Monterey County General Plan Draft Environmental Impact Report. Housing & Community Development Department, County of Monterey. Available at: <https://www.countyofmonterey.gov/government/departments-a-h/housing-community-development/planning-services/general-plan-update/draft-environmental-impact-report>

²⁴ Monterey County. (2010). Noise Element. In Monterey County General Plan. Housing & Community Development Department. Retrieved from https://www.elkhornsloughctp.org/uploads/files/1116287644Monterey_County_GP_complete.pdf

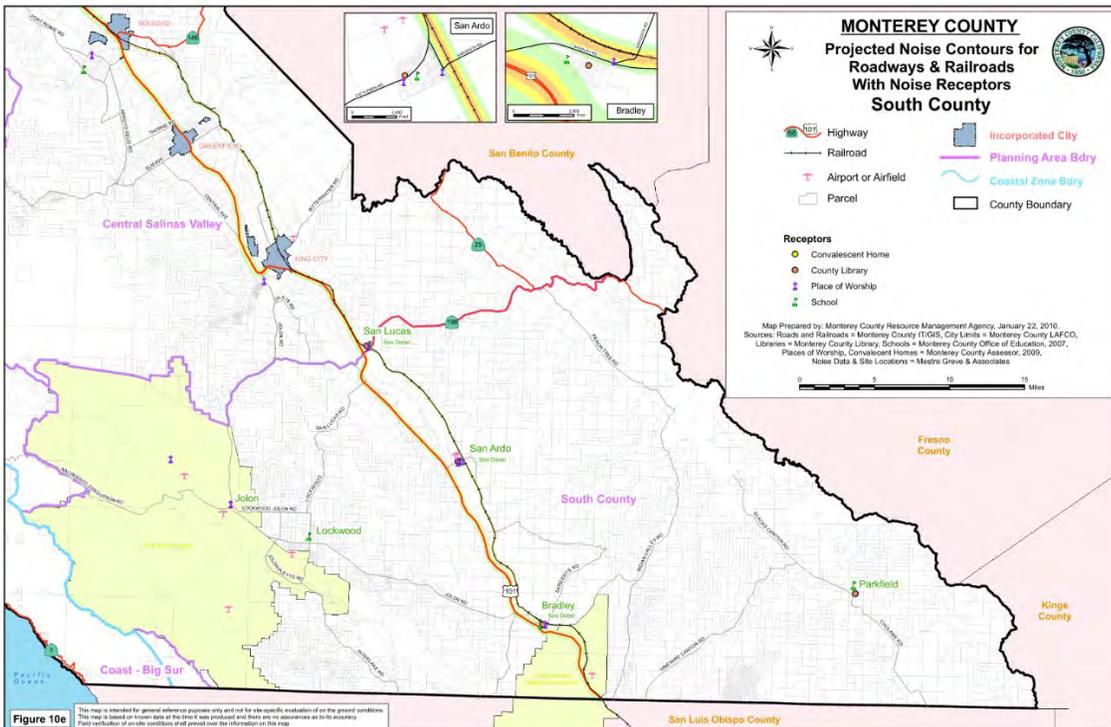
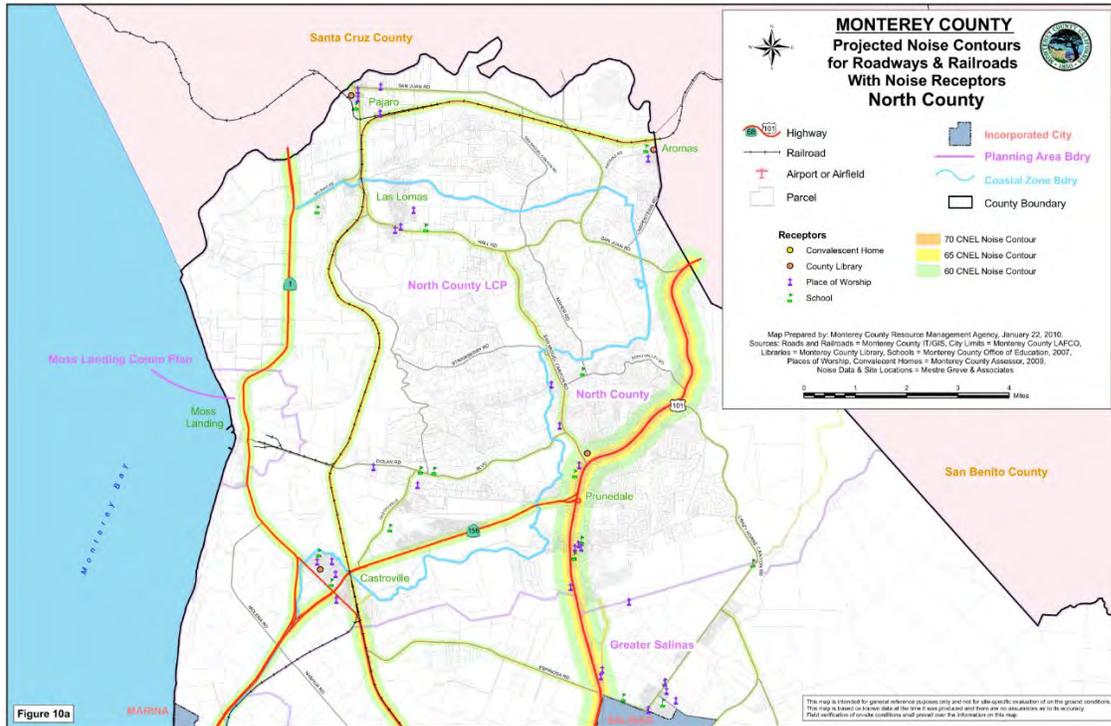


Figure 3. Contours from the Noise Element²⁴

8 Elimination of Short-Term Rentals Could Cause the Construction of New Hotels to Meet Demand; the Construction of New Hotels Would Result in Numerous Environmental Impacts That Require Studying

The prohibition of STRs, including those currently operating within the coastal region, could compel tourists to seek alternative accommodations, increasing demand for hotels and potentially leading to the development of additional hotels as a reasonably foreseeable consequence of the STR restrictions. The construction of hotels has impacts on the environment that have not been studied previously. In particular, construction of hotels has potential noise and air quality impacts as discussed below.

Potential Hotel Construction Air Quality and Health Impacts Resulting from STR Restrictions

Ramboll performed a screening health risk assessment to determine the potential cancer risk resulting from construction activity of a hypothetical new hotel. The emissions associated with the construction of these hotels encompass on-site, off-road heavy equipment, off-site, on-road vehicle travel, architectural coating, paving, and fugitive dust. Ramboll utilized CalEEMod to estimate construction emissions from a 250-room hotel as shown in Appendix B, which is an average mid-size hotel.

Ramboll used an existing hotel project site to model emissions in AERMOD as a surrogate for the space of hotel construction. Concentrations resulting from DPM emissions from off-road construction equipment in CalEEMod were modeled on receptors in a grid of 20 meters. The health risk assessment used default exposure assumptions for residents as outlined by OEHHA.²⁵

As indicated in Table 5, the construction of a hotel without emissions mitigation results in an excess cancer risk of 27 in a million for the maximum exposed individual (MEI), which exceeds the MBARD’s threshold of 10 in a million. Cancer risks continue to exceed the threshold until a distance of 230 feet from the construction area. Calculation details can be found in Appendix A.

Table 5. Cancer Risk from Hotel Construction

Source	Cancer Risk (in a million)
Construction of a 250 room Hotel	27
MBARD Threshold of Significance	10

Potential Hotel Construction Noise Impacts Resulting from STR Restrictions

Construction of structures generates noise, which is regulated by the County.

Monterey County Noise Ordinance

The County of Monterey regulates noise emissions via the Monterey County Municipal Code, specifically Chapter 10.60 (Noise Control).²⁶ The noise ordinance, summarized in Table 6, establishes that it is unlawful for any person at any location within unincorporated areas of the County to make, assist in making, allow, continue, create, or cause to be made any loud and unreasonable sound any day of the week from 9:00 p.m. to 7:00 a.m. the following morning. A loud and unreasonable sound includes any sound that is plainly audible at a distance of fifty (50) feet or more in any direction from the source of the sound or any sound that exceeds the exterior noise level standards set forth in the table below

²⁵OEHHA. 2015. Air Toxics Hot Spots Program. Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. February.

²⁶ https://library.municode.com/ca/monterey_county/codes/code_of_ordinances?nodeId=TIT10HESA_CH10.60NOCO

Table 6. Monterey County Noise Ordinance

Nighttime hourly equivalent sound level (Leq, dBA)	45
Maximum level, dBA	65

Analysis of New Hotel Construction

The effect of construction noise impacts on nearby noise-sensitive neighbors is dependent on the location and nature of the construction activities. Depending on the construction activities and neighboring land uses, there is a potential for possible significance threshold exceedances related to the resulting construction activities, particularly in relation to residential communities.

While noise from construction activities occurring within unincorporated areas of the county is not regulated by the Monterey County Municipal Code during daytime hours, noise from construction activities occurring during the nighttime hours must comply with the established limits outlined in Table 6. Any construction activities occurring within city limits or within incorporated areas of Monterey County must comply with the applicable limits set forth by the city.

Additionally, the potential for substantial temporary increases to the existing ambient conditions due to construction activities could be considered relative to CEQA guidelines.

Construction typically involves the use of heavy machinery that can be a significant source of noise and, while often temporary, can result in significant impacts. Construction equipment commonly includes air compressors, backhoes, concrete trucks, cranes, dump trucks, excavators, graders, pavers, tractors/dozers, vibratory rollers, portable generators, and water trucks. Depending on the phase of construction, project construction typically involves a combination of these types of off-road and portable construction equipment. Assuming a typical construction plan, common types of construction equipment, and typical construction equipment sound levels published by resources such as the U.S. Federal Highway Administration, the Federal Transit Administration, and manufacturers, potential overall sound levels can be estimated. Accordingly, construction sound levels could range from approximately 75 to 90 dBA assuming typical receptor distances of 500 ft to 50 ft. Construction activities also may need to occur at night due to various limitations. Examples include concrete pours that need to occur when other construction is not happening or would impede traffic, accelerated construction needs to meet hotel demand, and roadway construction work that needs to occur at nighttime.

Table 7 outlines general construction phasing and equipment assumptions employed to estimate approximate sound pressure levels (SPL) for common construction phases for a hotel use as generated in CalEEMod.²⁷ It is anticipated that these sound pressure levels are above typical suburban/urban ambient sound levels and therefore could cause a temporary increase above the threshold discussed above. For reference, typical suburban/urban background sound levels are commonly on the order of 45 to 55 dBA during daytime hours and lower during nighttime hours.²⁸ Because sound pressure levels from construction of a new hotel, which was needed due to STR restrictions, have the potential to cause a temporary increase above the noise level threshold, more analysis is needed to evaluate specific impacts and potential mitigation. While construction may be

²⁷ California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at <https://www.caleemod.com/>.

²⁸ U.S. Environmental Protection Agency, Community Noise, December 31, 1971.

exempt from the noise ordinance during daytime hours, the table below shows that the construction could have a significant noise impact on the community.

Furthermore, if any nighttime construction activity is needed for the hotel, the noise levels below show that threshold for nighttime work in the noise ordinance would be exceeded.

Table 7. Noise Impacts from Construction Activity

Construction Phase	Equipment Type	Qty	Avg. Usage Hours per Day	Size, Hp	Equip Lmax SPL @ 50 ft dBA	Acoustical Use Factor	Equip SPL @ 50 ft dBA	Total SPL @ 50 ft dBA	Total SPL @ 50 ft dBA	Total SPL @ 500 ft dBA
Site Preparation	Rubber Tired Dozers	3	8	367	85	40%	81	86	89	79
	Tractors/Loaders/Backhoes	4	8	84	84	40%	80	86		
Grading	Excavators	2	8	36	85	40%	81	84	90	80
	Graders	1	8	148	85	40%	81	81		
	Rubber Tired Dozers	1	8	367	85	40%	81	81		
	Scrapers	2	8	423	85	40%	81	84		
	Tractors/Loaders/Backhoes	2	8	84	84	40%	80	83		
Building Construction	Cranes	1	7	367	83	16%	75	75	87	77
	Forklifts	3	8	82	75	40%	71	76		
	Generator Sets	1	8	14	82	50%	79	79		
	Tractors/Loaders/Backhoes	3	7	84	84	40%	80	85		
	Welders	1	8	46	74	40%	70	70		
Paving	Pavers	2	8	81	85	50%	82	85	89	79
	Paving Equipment	2	6	89	85	50%	82	85		
	Rollers	2	6	36	85	20%	78	81		

9 The Significance Findings Previously Determined in the Monterey County Vacation Rental Ordinances Project Should be Reconsidered

In 2023, the County of Monterey released the Monterey County Vacation Rental Ordinances Project Environmental Impact Report (2023 EIR) that applies to the coastal and noncoastal areas of the

unincorporated areas of Monterey County.²⁹ The EIR evaluated the environmental impact under the California Environmental Quality Act (CEQA) of three draft ordinances amending the Monterey County Code for the purpose of establishing regulations, standards, and circumstances under which STRs may be allowed. According to the 2023 EIR, the proposed regulations limiting vacation rentals in Monterey County would not result in any significant and unavoidable impacts with respect to any environmental category including agricultural resources, air quality, energy, greenhouse gas emissions and climate change, land use and planning, noise, population and housing, transportation, tribal cultural resources, utilities and service systems, or wildfires. Similarly, the EIR did not identify any cumulative environmental impact as a result of the proposed limitations on the STRs in the area.

As discussed below in Table 8 through Table 12, Ramboll has provided additional expertise and insight into the impacts regarding air quality, energy, GHG and climate change, noise, and transportation. Based on the analysis performed and discussed in the previous sections, Ramboll has evidence and reason to believe that there are significant impacts that would result from the implementation of ordinances that would limit STRs in Monterey County.

²⁹ Monterey County. Vacation Rental Ordinances Project Draft EIR. December 2023. Available at: https://www.carmelvalleyassociation.org/PDEIR_EIR_12.8.23.pdf

Table 8. Discussion of the 2023 EIR Air Quality Significance Findings

Impact 4.4-1: Conflict with or Obstruct Implementation of the Applicable Air Quality Plans or Result in Emissions That Exceed Thresholds	
2023 EIR	Updated Evaluation
<p>“The project would be consistent with the applicable air quality plan (2012–2015 Air Quality Management Plan) and would not result in emission sources that exceed thresholds. The project would not result in a cumulatively considerable net increase of any criteria pollutant.” (page ES-8)</p> <p>Significance Finding: Less than Significant Impact</p>	<p>The statement that the project would align with the applicable air quality plan and not lead to emissions exceeding thresholds is disputable. Removing short-term rentals (STRs) in Monterey County's coastal areas will force guests to travel longer distances to hotels and other STRs, resulting in criteria pollutants, greenhouse gas emissions, and VMT and fuel consumption estimates that are up to 294% of those associated with the existing STRs.</p> <p>Additionally, it is expected that additional hotels would be constructed to handle the consistent tourists to the area. Construction of new hotels contribute to large increases in criteria air pollutants due to exhaust emissions from heavy-duty off-road equipment and fugitive dust emissions from movement of soil and transportation of construction equipment.</p> <p>Significance Finding: Potentially Significant Impact needing further evaluation</p>
Impact 4.4-2: Expose Sensitive Receptors to Substantial Pollutant Concentrations or Other Emissions (Including Odors)	
2023 EIR	Updated Evaluation
<p>“Implementing the project would not result in the construction or operation of any new land use development. It also would not introduce any uses identified as being associated with odors. Therefore, implementing the project would not result in exposure of sensitive receptors to TAC emissions or odors.” (page ES-8)</p>	<p>As a result of the STR restrictions, there could need to be more hotels built in order to provide accommodation options for visitors traveling to the area. Ramboll performed a screening health risk assessment to determine the potential cancer risk from constructing a hypothetical new average mid-size hotel. This assessment considered emissions from on-site equipment, vehicle travel, architectural coating, paving, and fugitive dust. The</p>

<p>Significance Finding: Less than Significant Impact</p>	<p>evaluation revealed that constructing a 250-room hotel could lead to an excess cancer risk of 27 in a million at a nearby receptor, surpassing the MBARD threshold of 10 in a million. Therefore, the STR restrictions could result in new hotel developments emitting toxic air contaminants and posing health risks to sensitive receptors.</p> <p>Significance Finding: Potentially Significant Impact needing further evaluation</p>
---	--

Table 9. Discussion of the 2023 EIR Energy Significance Findings

Impact 4.5-1: Result in a Potentially Significant Environmental Impact Due to Wasteful, Inefficient, or Unnecessary Consumption of Energy, or Wasteful Use of Energy Resources, during Project Construction or Operation, or Conflict with or Obstruct Implementation of a State or Local Plan for Renewable Energy or Energy Efficiency	
2023 EIR	Updated Evaluation
<p>“Implementation of the proposed regulations would not be expected to result in an increase in energy consumption, nor would it conflict with or obstruct a state or local plan for renewable energy or energy efficiency. It also would not result in the construction or operation of any new land use development or result in population growth or new sources of energy consumption.” (page ES-8)</p> <p>Significance Finding: Less than Significant Impact</p>	<p>As shown in Table 2 above, Ramboll evaluated the operational energy use per person, showing that hotels consume more electricity and natural gas per person than STRs. With assumed occupancy rates of 3 people per hotel room and 4.8 per STR, hotels are found to have significantly higher energy consumption rates per person. It is shown that the shift from STRs to hotels would increase energy consumption per person by 19%, leading to higher GHG emissions.</p> <p>Additionally, as shown in Table 3, the fuel consumption for mobile trips associated with hotels are nearly 200% greater than STRs that serve an equivalent population.</p> <p>Significance Finding: Potentially Significant Impact needing further evaluation</p>

Table 10. Discussion of the 2023 EIR Greenhouse Gas and Climate Change Significance Findings

Impact 4.6-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment, or Conflict with Any Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	
2023 EIR	Updated Evaluation
<p>“Implementation of the proposed regulations would not be expected to result in a significant increase in emissions and would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. It also would not result in the construction or operation of any new land use development or result in population growth or new emission sources that would conflict with GHG reduction planning efforts at the County or state level.” (page ES-9)</p> <p>Significance Finding: Less than Significant Impact</p>	<p>The statement that the project would align with the applicable air quality plan and not lead to emissions exceeding thresholds is disputable.</p> <p>Further restricting STRs forces guests to travel longer distances to hotels, resulting in increased trips, VMT, fuel consumption, and energy consumption. Our analysis reveals that visitors staying in hotels and STRs located farther away could generate up to 294% of greenhouse gas (GHG) emissions compared to those staying in STRs just from mobile emissions alone. This increase in VMT and emissions directly conflicts with regional and state goals to reduce vehicle emissions.</p> <p>Significance Finding: Potentially Significant Impact needing further evaluation</p>

Table 11 Discussion of the 2023 EIR Noise Significance Findings

Impact 4.8-1: Generate a Substantial Increase in Non-transportation Operational Noise	
2023 EIR	Updated Evaluation
<p>“The project would not involve development of any kind; therefore, the only increase in non-transportation operational noise possible from the project is expected to be associated with the raised voices and amplified music. Chapter 10.60 of the County Code identifies noise standards throughout the day, including more sensitive night hours when people typically sleep. Section 10.60.050 establishes a process of enforcement</p>	<p>While the project would not directly involve development of any kind, hotels may need to be constructed in order to accommodate the visitors traveling to the area who can no longer stay in STRs in the coast areas of Monterey County. As discussed in Section 8, construction of new hotels can create noise impacts that affect nearby residents and workers.</p>

that County officials may take in case a noise violation occurs and persists. In addition, the County's noise complaint history related to vacation rentals shows that noise complaints attributed to vacation rentals have been reported. However, the proposed regulations state that vacation rental permittees are responsible for all nuisance violations that occur in the vacation rental and that the permittee is charged a minimum inspection fee whenever an inspection occurs at the unit (proposed County Code Section 7.120.060). Proposed Chapter 7.120 related to limited and/or commercial vacation rentals, states that no outdoor amplified sound is permitted at any time and provides enforcement actions that may be taken by the County if the permittee is not in compliance with any provisions in the Chapter. Also, proposed amendments to Titles 20 and 21 of the County Code include grounds for suspension or revocation if more than two substantiated violations of the terms and conditions of the Coastal Development Permit, Use Permit, and/or Vacation Rental Operation Permit occur within a 12-month period. These provisions are strong disincentives against vacation rental-generated noise in excess of standards. Because noise generated by vacation rentals is expected to be consistent with that of existing residential uses across the unincorporated County, and the County has policies and enforcement mechanisms in place to discourage and enforce individual noise violations, it is not anticipated that implementing the project would result in frequent noise in excess of the noise thresholds identified in Chapter 10.60 and proposed Chapter 7.120 of the County Code. Furthermore, it should be noted that the project would not allow for the use of single family dwellings for events that could be a significant source of noise. Therefore, the project is not expected to substantially increase non-transportation operational noise." (page ES-9)

Significance Finding: Less than Significant Impact

Significance Finding: **Potentially Significant Impact** needing further evaluation

Impact 4.8-2: Generate a Substantial Increase in Traffic Noise	
2023 EIR	Updated Evaluation
<p>“The project involves amending the MCC to regulate vacation rentals in the unincorporated Monterey County and would not involve new development of any kind. As discussed in Section 4.10, “Transportation,” average trip rates would likely decrease for residences that are converted from single-family residences to vacation rentals. In addition, even if implementation of the project did result in an increase in the number of vehicular trips in the County, the increase would be slight, and any new trips would be dispersed throughout the roadway network of the unincorporated Monterey County. Therefore, it is not anticipated that roadway noise would increase noticeably if it increases at all. Therefore, implementing the project would not generate a substantial increase in traffic noise.” (page ES-10)</p> <p>Significance Finding: Less than Significant Impact</p>	<p>As discussed in Section 6, the VMT increases as a result of the STR restrictions suggest the traffic increases would likely be significant. Existing hotel stock is located along primary roadways and adding additional traffic to this area due to the shift to hotels as a result of the STR restrictions or the addition of new hotels to the area has the potential to exacerbate the existing traffic noise impacts or create a new traffic noise impact.</p> <p>Significance Finding: Potentially Significant Impact needing further evaluation</p>

Table 12. Discussion of the 2023 EIR Transportation Significance Findings

Impact 4.10-1: Conflict or Be Inconsistent with CEQA Guidelines pertaining to VMT	
2023 EIR	Updated Evaluation
<p>The project consists of three draft ordinances that would amend the MCC and would not result in development. The uncertainty related to estimating trip lengths associated with vacation rentals makes accurately quantifying the change in total VMT associated with implementation of the project difficult. For this reason, as allowed under State CEQA Guidelines Section 15145, this analysis concludes that it is too speculative to determine to what degree VMT would change as a result of implementation of</p>	<p>As discussed above, when a visitor is no longer able to stay in an STR near their chosen points of attraction, they have to travel farther to get from either a hotel or other STR located in a different region to where they intend to go. The emissions analysis is based on the assumption that a person staying in an STR located outside of the coastal region would have to travel at least 5 miles farther than someone who could stay in a STR close to the places they intend visit. Additionally, there are more trips</p>

<p>the project. Therefore, no significance conclusion is provided. (page ES-11)</p> <p>Significance Finding: No Significance Conclusion</p>	<p>associated with hotels compared to STRs, likely because guests need to travel for food and other necessary items, all of which increase the amount of VMT in the area.</p> <p>Significance Finding: Potentially Significant Impact needing further evaluation</p>
---	---

**APPENDIX A
CALCULATION DETAILS**

Appendix Table A1: VMT and Mobile Emissions Comparison of Short Term Rentals and Hotels

Land Use		Population Rate ¹ (per STR or hotel room)	Quantity ¹	Unit	Population Capacity ¹	Trip Distance ² (miles)	Trips Rate ³ (trips/day)	Daily Trips ⁴ (one-way trips/day)	Daily VMT ⁵ (miles/day)	Percent of Operational Emissions from STR to Hotel to serve the same Population ⁶						
										VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}	CO ₂ e
Short Term Rental	Existing	4.8	1,500	STRs	7,200	3.9	3.55	5,325	20,734	292%	294%	293%	294%	294%	294%	294%
Short Term Rental	Future	4.8	750	STRs	3,600	8.9	3.55	2,663	23,680							
Hotel		3.0	1,200	Hotel Rooms	3,600	3.9	7.99	9,588	37,333							

¹ There are approximately 1,500 active short-term rentals within Monterey and the average capacity is 4.8 people per STR (Airbtics). It would be assumed that as a result of the STR restriction, guests would stay in hotels or in STRs located further away. Therefore, in order to compare STR and Hotel VMT on an equivalent per capita basis, the number of future hotel rooms and STRs required to accommodate the total existing STR capacity is 1,200 hotels and 750 STRs. This assumes on average one hotel room has a capacity of 3 people. The percent increase in emissions holds regardless of the number of displaced STRs.

² Trip distances assume CalEEMod default trip length assumptions in Monterey. For this comparison, it is assumed visitor staying at future STR farther away must travel at least five additional miles to get to a STR located outside of the STR restriction jurisdiction. This assumption is based on the width of the coastal area, which extends roughly 5 miles inland. The trip distance for hotels are conservatively assumed to be the same as existing STRs.

³ Daily trip rate for Recreational Homes (ITE Land Use 260) and Hotel (ITE Land Use 310).

⁴ The number of daily trips were determined by multiplying the trip rate by the number of STRs or number of hotel rooms.

⁵ The number of daily vehicle miles traveled (VMT) were determined by multiplying the daily trips by the trip length.

⁶ The percent of operational mobile emissions for existing short term rentals compared to future short term rentals and hotels were calculated for criteria air pollutants and carbon dioxide equivalents. Emissions were determined using EMFAC2021 emission factors for Monterey County in 2027. The variation in the percentage between pollutants is due to the ratio of gram per trip and gram per mile emission factors for each pollutant.

Abbreviations:

CalEEMod - California Emissions Estimator Model

CO - carbon monoxide

CO₂e - carbon dioxide equivalents

ITE - Institute of Transportation Engineers

lb - pounds

NO_x - nitrogen oxide compounds (NO + NO₂)

PM_{2.5} - particulate matter less than 2.5 microns in diameter

PM₁₀ - particulate matter less than 10 microns in diameter

SO_x - sulfur oxide compounds

STR - short term rental

VOC - volatile organic compounds

VMT - vehicle miles traveled

References:

<https://app.airbtics.com/airbnb-data/United-States/CA/Monterey>

ITE. Trip Generation Manual 11th Edition.

California Air Resources Board (ARB) 2021. EMFAC2021. Available at: <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools>

Appendix Table A2: VMT and Fuel Consumption Comparison of Short Term Rentals and Hotels

Fuel	Percent of Fleet ^{1,2}	Fuel Consumption ² (gallons per mile)
Gasoline	93%	0.044
Diesel	7%	0.034

Land Use		Daily VMT ³ (miles/day)	Gasoline Consumption (gal) ⁴	Diesel Consumption (gal) ⁴
Short Term Rental	Existing	20,734	848	48
Short Term Rental	Future	61,013	2,494	140
Hotel				

¹ Gasoline includes gasoline fueled vehicles and plug-in hybrids. Natural gas is excluded from this analysis due to the negligible VMT from natural gas vehicles.

² The fleet mix and fuel consumption per mile is determined using EMFAC2021 for Monterey County in 2027. The fuel consumption rate is weighted based on fleet type.

³ The number of daily VMT were determined in Appendix Table A1.

⁴ Gasoline and diesel consumption are calculated by multiplying the VMT by the fuel-specific percentage and then by the weighted fuel consumption factor (gal/VMT) derived from EMFAC output.

Abbreviations:

STR - short term rental
VMT - vehicle miles traveled
gal - gallon

References:

California Air Resources Board (ARB) 2021. EMFAC2021. Available at: <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools>

Appendix Table A3: Hotel Construction Cancer Risk Calculation Details

Year	Receptor Age Group ¹	Exposure Parameters						
		Daily Breathing Rate (DBR) ²	Exposure Duration (ED) ³	Fraction of Time at Home (FAH) ⁴	Exposure Frequency (EF) ²	Age Sensitivity Factor (ASF) ⁵	Averaging Time (AT) ⁷	ASF-Weighted Intake Factor, Inhalation (IF _{inh})
		[L/kg-day]	[years]	[unitless]	[days/year]		[days]	[m ³ /kg-day]
Year 1	3rd Trimester	361	0.25	1.00	350	10	25500	0.012
	0-<2	1090	0.75	1.00		10		0.112
Year 2	0-<2	1090	1.0	1.00		10		0.150

Construction Phase ⁶	DPM Emissions ^f from Construction [ton/yr]	
	Year 1	Year 2
Site Preparation	0.0011	--
Grading	0.0023	--
Building Construction	0.041	0.00080
Paving	--	0.0021
Architectural Coating	--	0.00017
Total	0.044	0.0030

Cancer Risk Calculation					
Year	AERMOD Dispersion Factor at MEI ⁷	Construction Emissions ⁸	Average DPM Concentration ⁹	DPM Cancer Potency Factor ¹⁰	Cancer Risk ¹¹
	(ug/m ³)/ (g/s)	g/s	ug/m ³	(mg/kg-day) ⁻¹	in a million
Year 1	65	2.76E-03	1.79E-01	1.1	24.5
Year 2		1.91E-04	1.24E-02		2.0
Total Cancer Risk					26.5

Notes:

- The most conservative age group is a resident child beginning at the third trimester. All nearby receptors were conservatively modeled as residents to capture the maximum risk potential.
- Daily breathing rates and exposure frequency by age bin are consistent with OEHHA's Guidance Manual for Preparation of Health Risk Assessments.
- Annual exposure duration represents one full year. The exposure duration for all years is 1, as the health risk assessment is based on annual emissions.
- Fraction of time spent at home is conservatively assumed to be 1 (i.e., 24 hours/day) for age groups from the third trimester to less than 16 years old based on the recommendation from OEHHA.
- Age Sensitive Factors account for an "anticipated special sensitivity to carcinogens" of infants and children as recommended in the OEHHA guidance.
- Construction emissions were calculated in CalEEMod using default information for the construction of a mid-sized (250-room) hotel located in the hotel zone along Highway One in Monterey County. PM₁₀ emissions were used as a surrogate for diesel particulate matter (DPM).
- The construction area was modeled as an area source in AERMOD using the Monterey Regional Airport met station. Using the Chi/Q method, the maximally impacted receptor was identified by the receptor with the largest dispersion factor.
- The emission rate used in the cancer risk calculation is the DPM ton/year emissions converted to grams per second assuming 11 hours of construction per day, which is consistent with the County of Monterey's all lowed construction hours of 7AM to 6PM.
- The average concentration of diesel particulate matter is a product of the emission rate and the dispersion factor at the MEI.
- The cancer potency factor for DPM is provided by OEHHA guidance.
- Excess lifetime cancer risks were estimated using the following equation:

$$Risk_{inh} = \sum C_i \times CF \times IF_{inh} \times CPF_i \times ASF$$

Risk_{inh} = Cancer Risk for the Inhalation Pathway (unitless)
C_i = Annual Average Air Concentration for Chemical "i" ug/m³
CF = Conversion Factor (mg/ug)
IF_{inh} = Intake Factor for Inhalation (m³/kg-day)
CPF_i = Cancer Potency Factor (mg/kg-day)⁻¹
ASF = Age Sensitivity Factor (unitless)

Abbreviations:

AT - averaging time	g - gram
ASF - Age Sensitivity Factor	IF _{inh} - intake factor
CalEEMod - California Emissions Estimator Module	kg - kilogram
DBR - daily breathing rate	L - liter
DPM - diesel particulate matter	m ³ - cubic meter
ED - exposure duration	MEI - maximally impacted receptor
EF - exposure frequency	OEHHA - Office of Environmental Health Hazard Assessment
FAH - fraction of time at home	s - second

References:

- OEHHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. Available at <https://oehha.ca.gov/media/downloads/cnrn/2015guidancemanual.pdf>
- California Air Resources Board (ARB)/ California Office of Environmental Health Hazard Assessment (OEHHA). 2023. Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values. Updated on: May 1, 2023. Available at: <https://ww2.arb.ca.gov/sites/default/files/classic/toxics/healthval/contable05012023.pdf>
- USEPA. 2022. User's Guide for the AMS/EPA Regulatory Model (AERMOD). U.S. EPA Office of Air Quality Planning and Standards, Research Triangle Park, North Carolina. Available at: https://gaftp.epa.gov/Air/aqmg/SCRAM/models/preferred/aermod/aermod_userguide.pdf
- California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at <http://www.caleemod.com/>

**APPENDIX B
CALEEMOD REPORTS**

Hotel - Monterey Detailed Report

Table of Contents

1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
2. Emissions Summary
 - 2.1. Construction Emissions Compared Against Thresholds
 - 2.2. Construction Emissions by Year, Unmitigated
 - 2.4. Operations Emissions Compared Against Thresholds
 - 2.5. Operations Emissions by Sector, Unmitigated
3. Construction Emissions Details
 - 3.1. Site Preparation (2026) - Unmitigated
 - 3.3. Grading (2026) - Unmitigated
 - 3.5. Building Construction (2026) - Unmitigated
 - 3.7. Building Construction (2027) - Unmitigated
 - 3.9. Paving (2027) - Unmitigated

3.11. Architectural Coating (2027) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Hotel - Monterey
Construction Start Date	1/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.80
Precipitation (days)	27.6
Location	36.59010623649337, -121.89685610804926
County	Monterey
City	Monterey
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3243
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Hotel	250	Room	1.50	363,000	0.00	—	—	—

Enclosed Parking Structure	250	Space	1.50	100,000	0.00	—	—	—
----------------------------	-----	-------	------	---------	------	---	---	---

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.49	2.13	12.8	21.0	0.03	0.38	1,625	1,626	0.35	162	163	—	5,048	5,048	0.24	0.29	8.92	5,149
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	400	400	315	120	1.55	4.77	46,497	46,502	4.73	4,648	4,652	—	233,003	233,003	12.9	37.2	11.8	244,415
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	19.8	19.8	12.5	14.5	0.04	0.31	1,519	1,520	0.29	152	152	—	6,323	6,323	0.33	0.69	5.07	6,541
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.62	3.61	2.29	2.64	0.01	0.06	277	277	0.05	27.7	27.8	—	1,047	1,047	0.05	0.11	0.84	1,083

2.2. Construction Emissions by Year, Unmitigated

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

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.49	2.13	12.8	21.0	0.03	0.38	1,625	1,626	0.35	162	163	—	5,048	5,048	0.24	0.29	8.92	5,149
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	19.4	6.15	315	120	1.55	4.77	46,497	46,502	4.73	4,648	4,652	—	233,003	233,003	12.9	37.2	11.8	244,415
2027	400	400	12.5	19.9	0.03	0.34	1,625	1,626	0.32	162	163	—	4,914	4,914	0.23	0.28	0.21	5,004
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.84	1.42	12.5	14.5	0.04	0.31	1,519	1,520	0.29	152	152	—	6,323	6,323	0.33	0.69	5.07	6,541
2027	19.8	19.8	0.50	0.82	< 0.005	0.02	37.0	37.0	0.02	3.70	3.71	—	153	153	0.01	0.01	0.08	155
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.34	0.26	2.29	2.64	0.01	0.06	277	277	0.05	27.7	27.8	—	1,047	1,047	0.05	0.11	0.84	1,083
2027	3.62	3.61	0.09	0.15	< 0.005	< 0.005	6.76	6.76	< 0.005	0.67	0.68	—	25.3	25.3	< 0.005	< 0.005	0.01	25.6

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	20.1	19.3	7.52	63.4	0.10	0.30	3,830	3,830	0.28	382	382	85.9	13,482	13,568	9.62	0.51	598	14,558
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16.4	15.8	8.20	45.6	0.10	0.26	3,830	3,830	0.26	382	382	85.9	13,021	13,107	9.71	0.56	568	14,084
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	18.4	17.7	7.74	54.7	0.10	0.28	3,385	3,385	0.27	338	338	85.9	12,726	12,812	9.65	0.52	580	13,787

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.36	3.22	1.41	9.98	0.02	0.05	618	618	0.05	61.6	61.7	14.2	2,107	2,121	1.60	0.09	96.0	2,283

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.88	7.45	4.83	41.1	0.09	0.07	3,830	3,830	0.06	382	382	—	8,927	8,927	0.49	0.44	30.6	9,102
Area	11.9	11.7	0.17	20.1	< 0.005	0.04	—	0.04	0.03	—	0.03	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Energy	0.28	0.14	2.52	2.12	0.02	0.19	—	0.19	0.19	—	0.19	—	4,453	4,453	0.50	0.03	—	4,476
Water	—	—	—	—	—	—	—	—	—	—	—	12.2	19.2	31.3	1.25	0.03	—	71.5
Waste	—	—	—	—	—	—	—	—	—	—	—	73.8	0.00	73.8	7.37	0.00	—	258
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	567	567
Total	20.1	19.3	7.52	63.4	0.10	0.30	3,830	3,830	0.28	382	382	85.9	13,482	13,568	9.62	0.51	598	14,558
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.80	7.32	5.68	43.5	0.08	0.07	3,830	3,830	0.07	382	382	—	8,548	8,548	0.59	0.49	0.79	8,711
Area	8.35	8.35	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.28	0.14	2.52	2.12	0.02	0.19	—	0.19	0.19	—	0.19	—	4,453	4,453	0.50	0.03	—	4,476
Water	—	—	—	—	—	—	—	—	—	—	—	12.2	19.2	31.3	1.25	0.03	—	71.5
Waste	—	—	—	—	—	—	—	—	—	—	—	73.8	0.00	73.8	7.37	0.00	—	258
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	567	567
Total	16.4	15.8	8.20	45.6	0.10	0.26	3,830	3,830	0.26	382	382	85.9	13,021	13,107	9.71	0.56	568	14,084
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.33	6.89	5.11	38.8	0.08	0.07	3,385	3,385	0.06	338	338	—	8,197	8,197	0.52	0.45	12.6	8,358

Area	10.8	10.6	0.12	13.8	< 0.005	0.02	—	0.02	0.02	—	0.02	—	56.7	56.7	< 0.005	< 0.005	—	56.9
Energy	0.28	0.14	2.52	2.12	0.02	0.19	—	0.19	0.19	—	0.19	—	4,453	4,453	0.50	0.03	—	4,476
Water	—	—	—	—	—	—	—	—	—	—	—	12.2	19.2	31.3	1.25	0.03	—	71.5
Waste	—	—	—	—	—	—	—	—	—	—	—	73.8	0.00	73.8	7.37	0.00	—	258
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	567	567
Total	18.4	17.7	7.74	54.7	0.10	0.28	3,385	3,385	0.27	338	338	85.9	12,726	12,812	9.65	0.52	580	13,787
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.34	1.26	0.93	7.07	0.01	0.01	618	618	0.01	61.6	61.6	—	1,357	1,357	0.09	0.07	2.09	1,384
Area	1.97	1.94	0.02	2.52	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.39	9.39	< 0.005	< 0.005	—	9.42
Energy	0.05	0.03	0.46	0.39	< 0.005	0.03	—	0.03	0.03	—	0.03	—	737	737	0.08	0.01	—	741
Water	—	—	—	—	—	—	—	—	—	—	—	2.01	3.17	5.19	0.21	< 0.005	—	11.8
Waste	—	—	—	—	—	—	—	—	—	—	—	12.2	0.00	12.2	1.22	0.00	—	42.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	93.9	93.9
Total	3.36	3.22	1.41	9.98	0.02	0.05	618	618	0.05	61.6	61.7	14.2	2,107	2,121	1.60	0.09	96.0	2,283

3. Construction Emissions Details

3.1. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.34	1.13	9.84	10.8	0.03	0.42	—	0.42	0.39	—	0.39	—	2,716	2,716	0.11	0.02	—	2,725

Dust From Material Movement	—	—	—	—	—	—	3.20	3.20	—	0.41	0.41	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.13	0.15	< 0.005	0.01	—	0.01	0.01	—	0.01	—	37.2	37.2	< 0.005	< 0.005	—	37.3
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.16	6.16	< 0.005	< 0.005	—	6.18
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.03	0.30	0.00	0.00	50.2	50.2	0.00	5.01	5.01	—	50.1	50.1	< 0.005	< 0.005	0.01	50.9

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	18.0	5.00	305	109	1.52	4.34	46,444	46,448	4.34	4,642	4,646	—	230,237	230,237	12.8	37.1	11.8	241,639
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	0.64	0.64	0.00	0.06	0.06	—	0.69	0.69	< 0.005	< 0.005	< 0.005	0.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.25	0.07	4.09	1.48	0.02	0.06	588	588	0.06	58.8	58.9	—	3,153	3,153	0.18	0.51	2.68	3,311
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	0.12	0.12	0.00	0.01	0.01	—	0.11	0.11	< 0.005	< 0.005	< 0.005	0.12
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.05	0.01	0.75	0.27	< 0.005	0.01	107	107	0.01	10.7	10.7	—	522	522	0.03	0.08	0.44	548

3.3. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.70	1.42	12.9	14.0	0.02	0.58	—	0.58	0.53	—	0.53	—	2,455	2,455	0.10	0.02	—	2,463
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.28	0.31	< 0.005	0.01	—	0.01	0.01	—	0.01	—	53.8	53.8	< 0.005	< 0.005	—	54.0
Dust From Material Movement	—	—	—	—	—	—	0.16	0.16	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.91	8.91	< 0.005	< 0.005	—	8.94
Dust From Material Movement	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.04	0.40	0.00	0.00	66.9	66.9	0.00	6.68	6.68	—	66.9	66.9	< 0.005	< 0.005	0.01	67.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	1.36	1.36	0.00	0.14	0.14	—	1.47	1.47	< 0.005	< 0.005	< 0.005	1.50

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	0.25	0.25	0.00	0.02	0.02	—	0.24	0.24	< 0.005	< 0.005	< 0.005	0.25	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.41	1.18	10.1	11.8	0.02	0.36	—	0.36	0.33	—	0.33	—	2,201	2,201	0.09	0.02	—	2,208
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.41	1.18	10.1	11.8	0.02	0.36	—	0.36	0.33	—	0.33	—	2,201	2,201	0.09	0.02	—	2,208
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.87	0.73	6.25	7.27	0.01	0.22	—	0.22	0.21	—	0.21	—	1,361	1,361	0.06	0.01	—	1,366
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.14	1.33	< 0.005	0.04	—	0.04	0.04	—	0.04	—	225	225	0.01	< 0.005	—	226
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.94	0.88	0.59	8.22	0.00	0.00	1,302	1,302	0.00	130	130	—	1,379	1,379	0.08	0.06	5.38	1,404
Vendor	0.14	0.07	2.09	1.01	0.01	0.02	324	324	0.02	32.3	32.3	—	1,468	1,468	0.07	0.22	3.53	1,537
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.93	0.87	0.75	7.79	0.00	0.00	1,302	1,302	0.00	130	130	—	1,300	1,300	0.09	0.06	0.14	1,320
Vendor	0.13	0.06	2.21	1.04	0.01	0.02	324	324	0.02	32.3	32.3	—	1,469	1,469	0.07	0.22	0.09	1,535
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.57	0.53	0.43	4.60	0.00	0.00	744	744	0.00	74.3	74.3	—	808	808	0.05	0.04	1.44	821
Vendor	0.09	0.04	1.34	0.63	0.01	0.01	185	185	0.01	18.5	18.5	—	908	908	0.04	0.13	0.95	950
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.10	0.08	0.84	0.00	0.00	136	136	0.00	13.6	13.6	—	134	134	0.01	0.01	0.24	136

Vendor	0.02	0.01	0.24	0.12	< 0.005	< 0.005	33.8	33.8	< 0.005	3.37	3.38	—	150	150	0.01	0.02	0.16	157
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.35	1.13	9.70	11.7	0.02	0.32	—	0.32	0.30	—	0.30	—	2,201	2,201	0.09	0.02	—	2,208
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.13	0.16	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	30.1	30.1	< 0.005	< 0.005	—	30.3
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.99	4.99	< 0.005	< 0.005	—	5.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.85	0.79	0.70	7.26	0.00	0.00	1,302	1,302	0.00	130	130	—	1,276	1,276	0.09	0.06	0.13	1,295
Vendor	0.12	0.05	2.12	0.99	0.01	0.02	324	324	0.02	32.3	32.3	—	1,438	1,438	0.06	0.21	0.08	1,500
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	16.5	16.5	0.00	1.65	1.65	—	17.6	17.6	< 0.005	< 0.005	0.03	17.9
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	4.10	4.10	< 0.005	0.41	0.41	—	19.7	19.7	< 0.005	< 0.005	0.02	20.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	3.01	3.01	0.00	0.30	0.30	—	2.91	2.91	< 0.005	< 0.005	< 0.005	2.96
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.75	0.75	< 0.005	0.07	0.07	—	3.26	3.26	< 0.005	< 0.005	< 0.005	3.40
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.77	0.65	5.74	8.20	0.01	0.23	—	0.23	0.21	—	0.21	—	1,244	1,244	0.05	0.01	—	1,248
Paving	0.22	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.28	0.40	< 0.005	0.01	—	0.01	0.01	—	0.01	—	61.3	61.3	< 0.005	< 0.005	—	61.6
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.2	10.2	< 0.005	< 0.005	—	10.2
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.05	0.56	0.00	0.00	100	100	0.00	10.0	10.0	—	98.4	98.4	0.01	< 0.005	0.01	99.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	4.58	4.58	0.00	0.46	0.46	—	4.88	4.88	< 0.005	< 0.005	0.01	4.96
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	0.84	0.84	0.00	0.08	0.08	—	0.81	0.81	< 0.005	< 0.005	< 0.005	0.82
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	400	400	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.04	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.58	6.58	< 0.005	< 0.005	—	6.61

Architect Coatings	19.7	19.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.09	1.09	< 0.005	< 0.005	—	1.09
Architectural Coatings	3.60	3.60	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.16	0.14	1.45	0.00	0.00	260	260	0.00	26.0	26.0	—	255	255	0.02	0.01	0.03	259
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.07	0.00	0.00	11.9	11.9	0.00	1.19	1.19	—	12.6	12.6	< 0.005	< 0.005	0.02	12.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	2.17	2.17	0.00	0.22	0.22	—	2.09	2.09	< 0.005	< 0.005	< 0.005	2.13
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	7.88	7.45	4.83	41.1	0.09	0.07	3,830	3,830	0.06	382	382	—	8,927	8,927	0.49	0.44	30.6	9,102
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	7.88	7.45	4.83	41.1	0.09	0.07	3,830	3,830	0.06	382	382	—	8,927	8,927	0.49	0.44	30.6	9,102
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	7.80	7.32	5.68	43.5	0.08	0.07	3,830	3,830	0.07	382	382	—	8,548	8,548	0.59	0.49	0.79	8,711
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	7.80	7.32	5.68	43.5	0.08	0.07	3,830	3,830	0.07	382	382	—	8,548	8,548	0.59	0.49	0.79	8,711
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	1.34	1.26	0.93	7.07	0.01	0.01	618	618	0.01	61.6	61.6	—	1,357	1,357	0.09	0.07	2.09	1,384
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.34	1.26	0.93	7.07	0.01	0.01	618	618	0.01	61.6	61.6	—	1,357	1,357	0.09	0.07	2.09	1,384

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	1,253	1,253	0.20	0.02	—	1,265
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	196	196	0.03	< 0.005	—	198
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,448	1,448	0.23	0.03	—	1,463
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	1,253	1,253	0.20	0.02	—	1,265
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	196	196	0.03	< 0.005	—	198
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,448	1,448	0.23	0.03	—	1,463
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	207	207	0.03	< 0.005	—	209
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	—	32.4	32.4	0.01	< 0.005	—	32.7
Total	—	—	—	—	—	—	—	—	—	—	—	—	240	240	0.04	< 0.005	—	242

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.28	0.14	2.52	2.12	0.02	0.19	—	0.19	0.19	—	0.19	—	3,005	3,005	0.27	0.01	—	3,013
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.28	0.14	2.52	2.12	0.02	0.19	—	0.19	0.19	—	0.19	—	3,005	3,005	0.27	0.01	—	3,013
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.28	0.14	2.52	2.12	0.02	0.19	—	0.19	0.19	—	0.19	—	3,005	3,005	0.27	0.01	—	3,013
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.28	0.14	2.52	2.12	0.02	0.19	—	0.19	0.19	—	0.19	—	3,005	3,005	0.27	0.01	—	3,013
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	0.05	0.03	0.46	0.39	< 0.005	0.03	—	0.03	0.03	—	0.03	—	497	497	0.04	< 0.005	—	499
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.05	0.03	0.46	0.39	< 0.005	0.03	—	0.03	0.03	—	0.03	—	497	497	0.04	< 0.005	—	499

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
--------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	7.77	7.77	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	3.58	3.31	0.17	20.1	< 0.005	0.04	—	0.04	0.03	—	0.03	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Total	11.9	11.7	0.17	20.1	< 0.005	0.04	—	0.04	0.03	—	0.03	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	7.77	7.77	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.58	0.58	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	8.35	8.35	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	1.42	1.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape	0.45	0.41	0.02	2.52	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.39	9.39	< 0.005	< 0.005	—	9.42
Total	1.97	1.94	0.02	2.52	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.39	9.39	< 0.005	< 0.005	—	9.42

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	12.2	19.2	31.3	1.25	0.03	—	71.5
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12.2	19.2	31.3	1.25	0.03	—	71.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	12.2	19.2	31.3	1.25	0.03	—	71.5
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12.2	19.2	31.3	1.25	0.03	—	71.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	2.01	3.17	5.19	0.21	< 0.005	—	11.8
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	2.01	3.17	5.19	0.21	< 0.005	—	11.8
-------	---	---	---	---	---	---	---	---	---	---	---	------	------	------	------	---------	---	------

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	73.8	0.00	73.8	7.37	0.00	—	258
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	73.8	0.00	73.8	7.37	0.00	—	258
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	73.8	0.00	73.8	7.37	0.00	—	258
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	73.8	0.00	73.8	7.37	0.00	—	258
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	12.2	0.00	12.2	1.22	0.00	—	42.7
Enclosed Parking Structure	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12.2	0.00	12.2	1.22	0.00	—	42.7

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	567	567
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	567	567
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	567	567
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	567	567
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	93.9	93.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	93.9	93.9

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
-----------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	1/30/2026	2/6/2026	5.00	5.00	—
Grading	Grading	2/7/2026	2/18/2026	5.00	8.00	—
Building Construction	Building Construction	2/19/2026	1/7/2027	5.00	230	—
Paving	Paving	1/8/2027	2/2/2027	5.00	18.0	—
Architectural Coating	Architectural Coating	2/3/2027	2/28/2027	5.00	18.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	1.00	7.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Average	1.00	8.00	423	0.48
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00	7.00	84.0	0.37
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	2.00	7.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	1.00	6.00	84.0	0.37
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Paving	Tractors/Loaders/Back hoes	Diesel	Average	1.00	8.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
------------	-----------	-----------------------	----------------	-------------

Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	9.47	LDA,LDT1,LDT2
Site Preparation	Vendor	—	6.03	HHDT,MHDT
Site Preparation	Hauling	3,284	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	9.47	LDA,LDT1,LDT2
Grading	Vendor	—	6.03	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	194	9.47	LDA,LDT1,LDT2
Building Construction	Vendor	75.9	6.03	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	9.47	LDA,LDT1,LDT2
Paving	Vendor	—	6.03	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	38.9	9.47	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.03	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	547,440	181,827	3,920

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	131,373	7.50	0.00	—
Grading	—	—	8.00	0.00	—
Paving	0.00	0.00	0.00	0.00	1.50

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Hotel	0.00	0%
Enclosed Parking Structure	1.50	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

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

2027	0.00	204	0.03	< 0.005
------	------	-----	------	---------

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Hotel	2,090	2,047	1,487	729,218	10,709	10,491	7,622	3,736,462
Enclosed Parking Structure	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	547,440	181,827	3,920

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Hotel	2,241,689	204	0.0330	0.0040	9,375,109
Enclosed Parking Structure	350,143	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Hotel	6,341,693	0.00
Enclosed Parking Structure	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Hotel	137	—
Enclosed Parking Structure	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

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

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

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

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.75	annual days of extreme heat
Extreme Precipitation	4.10	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	31.3	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A

Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

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

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	13.6
AQ-PM	2.14
AQ-DPM	48.3
Drinking Water	38.7
Lead Risk Housing	35.3
Pesticides	0.00
Toxic Releases	0.34
Traffic	34.9
Effect Indicators	—
CleanUp Sites	47.7
Groundwater	67.1
Haz Waste Facilities/Generators	59.8
Impaired Water Bodies	77.3
Solid Waste	59.2
Sensitive Population	—
Asthma	21.9
Cardio-vascular	5.50
Low Birth Weights	30.8
Socioeconomic Factor Indicators	—
Education	17.8
Housing	16.3
Linguistic	3.74
Poverty	21.5
Unemployment	11.9

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	87.54010009
Employed	53.74053638
Median HI	75.27268061
Education	—
Bachelor's or higher	77.17182086
High school enrollment	100
Preschool enrollment	88.79763891
Transportation	—
Auto Access	60.64416784
Active commuting	23.97022969
Social	—
2-parent households	72.61645066
Voting	92.99371231
Neighborhood	—
Alcohol availability	58.48838701
Park access	48.18426793
Retail density	44.8222764
Supermarket access	45.8488387
Tree canopy	97.69023483
Housing	—
Homeownership	63.76235083
Housing habitability	85.37148723
Low-inc homeowner severe housing cost burden	60.02823046
Low-inc renter severe housing cost burden	96.29154369

Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	96.44552804
Arthritis	0.0
Asthma ER Admissions	94.8
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	47.7
Cognitively Disabled	50.3
Physically Disabled	36.0
Heart Attack ER Admissions	99.6
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	66.5
SLR Inundation Area	0.0

Children	71.1
Elderly	2.3
English Speaking	88.3
Foreign-born	18.2
Outdoor Workers	79.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	90.4
Traffic Density	15.6
Traffic Access	0.0
Other Indices	—
Hardship	11.2
Other Decision Support	—
2016 Voting	88.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	8.00
Healthy Places Index Score for Project Location (b)	88.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Lot acreage more representative for Monterey County.
Construction: Construction Phases	Removed demolition.

Single Family Res - Monterey Detailed Report

Table of Contents

1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
2. Emissions Summary
 - 2.1. Construction Emissions Compared Against Thresholds
 - 2.2. Construction Emissions by Year, Unmitigated
 - 2.4. Operations Emissions Compared Against Thresholds
 - 2.5. Operations Emissions by Sector, Unmitigated
3. Construction Emissions Details
 - 3.1. Demolition (2026) - Unmitigated
 - 3.3. Site Preparation (2026) - Unmitigated
 - 3.5. Grading (2026) - Unmitigated
 - 3.7. Building Construction (2026) - Unmitigated
 - 3.9. Building Construction (2027) - Unmitigated

3.11. Building Construction (2028) - Unmitigated

3.13. Building Construction (2029) - Unmitigated

3.15. Building Construction (2030) - Unmitigated

3.17. Building Construction (2031) - Unmitigated

3.19. Paving (2031) - Unmitigated

3.21. Architectural Coating (2031) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Single Family Res - Monterey
Construction Start Date	1/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.80
Precipitation (days)	27.6
Location	36.58958601483292, -121.89768039376092
County	Monterey
City	Monterey
Air District	Monterey Bay ARD
Air Basin	North Central Coast
TAZ	3243
EDFZ	6
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	156	Dwelling Unit	50.6	304,200	1,827,206	—	750	—

Parking Lot	156	Space	1.40	0.00	0.00	—	—	—
-------------	-----	-------	------	------	------	---	---	---

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	108	108	29.2	29.5	0.06	1.24	447	447	1.14	44.6	45.0	—	6,740	6,740	0.28	0.08	2.12	6,766
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.72	3.13	27.3	28.4	0.06	1.12	447	447	1.03	44.6	45.0	—	6,732	6,732	0.28	0.08	0.06	6,757
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	22.5	22.5	16.5	17.1	0.03	0.68	296	296	0.62	29.6	29.8	—	3,626	3,626	0.15	0.06	0.65	3,642
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.11	4.10	3.01	3.13	0.01	0.12	54.0	54.1	0.11	5.39	5.43	—	600	600	0.02	0.01	0.11	603

2.2. Construction Emissions by Year, Unmitigated

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

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

Single Family Res - Monterey Detailed Report, 3/26/2025

2026	3.83	3.22	29.2	29.5	0.06	1.24	143	144	1.14	21.8	22.9	—	6,740	6,740	0.28	0.06	0.55	6,766
2027	1.52	1.28	9.99	15.4	0.03	0.34	447	447	0.31	44.6	45.0	—	3,104	3,104	0.13	0.08	2.12	3,133
2028	1.45	1.23	9.49	15.2	0.03	0.30	447	447	0.28	44.6	44.9	—	3,089	3,089	0.13	0.08	1.93	3,118
2029	1.41	1.19	9.11	15.0	0.03	0.28	447	447	0.26	44.6	44.9	—	3,073	3,073	0.12	0.08	1.74	3,101
2030	1.37	1.16	8.90	14.9	0.03	0.26	447	447	0.24	44.6	44.9	—	3,057	3,057	0.12	0.08	1.57	3,085
2031	108	108	6.15	10.3	0.01	0.21	100	101	0.19	10.0	10.2	—	1,608	1,608	0.06	0.02	0.26	1,615
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.72	3.13	27.3	28.4	0.06	1.12	447	447	1.03	44.6	45.0	—	6,732	6,732	0.28	0.08	0.06	6,757
2027	1.50	1.27	10.1	15.3	0.03	0.34	447	447	0.31	44.6	45.0	—	3,081	3,081	0.13	0.08	0.06	3,109
2028	1.45	1.22	9.56	15.1	0.03	0.30	447	447	0.28	44.6	44.9	—	3,067	3,067	0.12	0.08	0.05	3,095
2029	1.41	1.19	9.18	14.9	0.03	0.28	447	447	0.26	44.6	44.9	—	3,052	3,052	0.12	0.08	0.05	3,078
2030	1.35	1.16	8.96	14.8	0.03	0.26	447	447	0.24	44.6	44.9	—	3,036	3,036	0.12	0.08	0.04	3,063
2031	1.32	1.12	8.66	14.6	0.03	0.25	447	447	0.23	44.6	44.9	—	3,022	3,022	0.12	0.08	0.04	3,047
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.24	1.89	16.5	17.1	0.03	0.68	116	116	0.62	13.3	13.9	—	3,626	3,626	0.15	0.04	0.24	3,642
2027	1.07	0.91	7.17	10.8	0.02	0.24	295	295	0.22	29.5	29.7	—	2,202	2,202	0.10	0.06	0.65	2,222
2028	1.03	0.87	6.83	10.8	0.02	0.22	296	296	0.20	29.6	29.8	—	2,198	2,198	0.09	0.06	0.60	2,218
2029	1.00	0.85	6.54	10.6	0.02	0.20	295	295	0.18	29.5	29.7	—	2,181	2,181	0.09	0.06	0.54	2,200
2030	0.97	0.82	6.38	10.5	0.02	0.19	295	295	0.17	29.5	29.7	—	2,170	2,170	0.08	0.06	0.48	2,189
2031	22.5	22.5	2.11	3.54	0.01	0.06	65.7	65.8	0.06	6.56	6.62	—	608	608	0.02	0.01	0.09	611
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.41	0.34	3.01	3.13	0.01	0.12	21.1	21.2	0.11	2.42	2.53	—	600	600	0.02	0.01	0.04	603
2027	0.20	0.17	1.31	1.98	< 0.005	0.04	53.9	53.9	0.04	5.38	5.42	—	365	365	0.02	0.01	0.11	368
2028	0.19	0.16	1.25	1.96	< 0.005	0.04	54.0	54.1	0.04	5.39	5.43	—	364	364	0.01	0.01	0.10	367
2029	0.18	0.15	1.19	1.94	< 0.005	0.04	53.9	53.9	0.03	5.38	5.41	—	361	361	0.01	0.01	0.09	364
2030	0.18	0.15	1.16	1.92	< 0.005	0.03	53.9	53.9	0.03	5.38	5.41	—	359	359	0.01	0.01	0.08	362

2031	4.11	4.10	0.38	0.65	< 0.005	0.01	12.0	12.0	0.01	1.20	1.21	—	101	101	< 0.005	< 0.005	0.01	101
------	------	------	------	------	---------	------	------	------	------	------	------	---	-----	-----	---------	---------	------	-----

2.4. Operations Emissions Compared Against Thresholds

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

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	18.3	17.8	7.21	40.0	0.08	1.05	2,073	2,074	1.04	207	208	196	10,770	10,966	13.7	0.33	18.7	11,424
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	17.5	16.9	7.64	33.5	0.08	1.04	2,073	2,074	1.04	207	208	196	10,544	10,740	13.7	0.36	2.61	11,192
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16.4	15.1	5.94	41.8	0.10	1.77	1,873	1,875	1.71	187	189	486	8,305	8,792	15.3	0.33	9.16	9,282
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.00	2.75	1.08	7.63	0.02	0.32	342	342	0.31	34.1	34.4	80.5	1,375	1,456	2.54	0.05	1.52	1,537

2.5. Operations Emissions by Sector, Unmitigated

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

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.40	5.14	2.90	24.4	0.05	0.04	2,073	2,073	0.04	207	207	—	4,894	4,894	0.32	0.27	16.5	4,998
Area	12.7	12.6	2.74	14.9	0.02	0.88	—	0.88	0.88	—	0.88	66.3	3,246	3,313	0.07	0.01	—	3,319
Energy	0.18	0.09	1.57	0.67	0.01	0.13	—	0.13	0.13	—	0.13	—	2,553	2,553	0.27	0.01	—	2,564
Water	—	—	—	—	—	—	—	—	—	—	—	12.5	76.2	88.7	1.29	0.03	—	131

Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	410
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.18	2.18
Total	18.3	17.8	7.21	40.0	0.08	1.05	2,073	2,074	1.04	207	208	196	10,770	10,966	13.7	0.33	18.7	11,424
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.34	5.05	3.41	26.8	0.05	0.04	2,073	2,073	0.04	207	207	—	4,691	4,691	0.39	0.30	0.43	4,790
Area	11.9	11.8	2.66	6.08	0.02	0.88	—	0.88	0.88	—	0.88	66.3	3,223	3,289	0.07	0.01	—	3,295
Energy	0.18	0.09	1.57	0.67	0.01	0.13	—	0.13	0.13	—	0.13	—	2,553	2,553	0.27	0.01	—	2,564
Water	—	—	—	—	—	—	—	—	—	—	—	12.5	76.2	88.7	1.29	0.03	—	131
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	410
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.18	2.18
Total	17.5	16.9	7.64	33.5	0.08	1.04	2,073	2,074	1.04	207	208	196	10,544	10,740	13.7	0.36	2.61	11,192
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.13	4.86	3.13	24.2	0.05	0.04	1,873	1,873	0.04	187	187	—	4,600	4,600	0.35	0.28	6.99	4,698
Area	11.1	10.1	1.24	17.0	0.05	1.60	—	1.60	1.55	—	1.55	356	1,076	1,432	1.69	< 0.005	—	1,476
Energy	0.18	0.09	1.57	0.67	0.01	0.13	—	0.13	0.13	—	0.13	—	2,553	2,553	0.27	0.01	—	2,564
Water	—	—	—	—	—	—	—	—	—	—	—	12.5	76.2	88.7	1.29	0.03	—	131
Waste	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	410
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.18	2.18
Total	16.4	15.1	5.94	41.8	0.10	1.77	1,873	1,875	1.71	187	189	486	8,305	8,792	15.3	0.33	9.16	9,282
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.94	0.89	0.57	4.41	0.01	0.01	342	342	0.01	34.1	34.1	—	762	762	0.06	0.05	1.16	778
Area	2.03	1.85	0.23	3.10	0.01	0.29	—	0.29	0.28	—	0.28	59.0	178	237	0.28	< 0.005	—	244
Energy	0.03	0.02	0.29	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	423	423	0.04	< 0.005	—	425
Water	—	—	—	—	—	—	—	—	—	—	—	2.07	12.6	14.7	0.21	0.01	—	21.6
Waste	—	—	—	—	—	—	—	—	—	—	—	19.4	0.00	19.4	1.94	0.00	—	67.9
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.36	0.36

Total	3.00	2.75	1.08	7.63	0.02	0.32	342	342	0.31	34.1	34.4	80.5	1,375	1,456	2.54	0.05	1.52	1,537
-------	------	------	------	------	------	------	-----	-----	------	------	------	------	-------	-------	------	------	------	-------

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.52	0.44	3.96	3.64	0.01	0.16	—	0.16	0.15	—	0.15	—	657	657	0.03	0.01	—	659
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.72	0.67	< 0.005	0.03	—	0.03	0.03	—	0.03	—	109	109	< 0.005	< 0.005	—	109
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.63	0.00	0.00	100	100	0.00	10.0	10.0	—	106	106	0.01	< 0.005	0.42	108
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.06	0.60	0.00	0.00	100	100	0.00	10.0	10.0	—	100	100	0.01	< 0.005	0.01	102
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.11	0.00	0.00	17.8	17.8	0.00	1.78	1.78	—	19.3	19.3	< 0.005	< 0.005	0.03	19.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	3.25	3.25	0.00	0.32	0.32	—	3.20	3.20	< 0.005	< 0.005	0.01	3.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.41	0.34	3.20	3.16	0.01	0.14	—	0.14	0.13	—	0.13	—	581	581	0.02	< 0.005	—	583
Dust From Material Movement	—	—	—	—	—	—	2.15	2.15	—	1.11	1.11	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.58	0.58	< 0.005	0.02	—	0.02	0.02	—	0.02	—	96.1	96.1	< 0.005	< 0.005	—	96.5	
Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.20	0.20	—	—	—	—	—	—	—	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.08	0.08	0.05	0.74	0.00	0.00	117	117	0.00	11.7	11.7	—	124	124	0.01	0.01	0.48	126	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.01	0.01	0.01	0.07	0.00	0.00	11.9	11.9	0.00	1.19	1.19	—	12.9	12.9	< 0.005	< 0.005	0.02	13.1	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	2.17	2.17	0.00	0.22	0.22	—	2.13	2.13	< 0.005	< 0.005	< 0.005	2.17	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

3.5. Grading (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	9.20	9.20	—	3.65	3.65	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.09	0.92	8.20	8.31	0.02	0.34	—	0.34	0.31	—	0.31	—	1,989	1,989	0.08	0.02	—	1,995

Dust From Material Movement	—	—	—	—	—	—	2.77	2.77	—	1.10	1.10	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20	0.17	1.50	1.52	< 0.005	0.06	—	0.06	0.06	—	0.06	—	329	329	0.01	< 0.005	—	330
Dust From Material Movement	—	—	—	—	—	—	0.51	0.51	—	0.20	0.20	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.06	0.85	0.00	0.00	134	134	0.00	13.4	13.4	—	142	142	0.01	0.01	0.55	144
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.08	0.80	0.00	0.00	134	134	0.00	13.4	13.4	—	134	134	0.01	0.01	0.01	136
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.23	0.00	0.00	37.3	37.3	0.00	3.72	3.72	—	40.5	40.5	< 0.005	< 0.005	0.07	41.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	< 0.005	0.04	0.00	0.00	6.81	6.81	0.00	0.68	0.68	—	6.70	6.70	< 0.005	< 0.005	0.01	6.81
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.04	1.37	< 0.005	0.04	—	0.04	0.04	—	0.04	—	253	253	0.01	< 0.005	—	254
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.02	0.19	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	41.9	41.9	< 0.005	< 0.005	—	42.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.27	0.25	0.22	2.25	0.00	0.00	376	376	0.00	37.5	37.5	—	375	375	0.03	0.02	0.04	381
Vendor	0.03	0.01	0.48	0.23	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	323	323	0.01	0.05	0.02	337
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.23	0.00	0.00	36.7	36.7	0.00	3.67	3.67	—	39.9	39.9	< 0.005	< 0.005	0.07	40.5
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	6.94	6.95	< 0.005	0.69	0.69	—	34.1	34.1	< 0.005	< 0.005	0.04	35.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	< 0.005	< 0.005	0.04	0.00	0.00	6.70	6.70	0.00	0.67	0.67	—	6.60	6.60	< 0.005	< 0.005	0.01	6.71
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	1.27	1.27	< 0.005	0.13	0.13	—	5.64	5.64	< 0.005	< 0.005	0.01	5.90
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.71	9.24	0.02	0.24	—	0.24	0.22	—	0.22	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.22	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.26	0.23	0.16	2.21	0.00	0.00	376	376	0.00	37.5	37.5	—	391	391	0.02	0.02	1.43	397
Vendor	0.03	0.01	0.44	0.21	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	316	316	0.01	0.05	0.69	330
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.23	0.20	2.10	0.00	0.00	376	376	0.00	37.5	37.5	—	368	368	0.03	0.02	0.04	374
Vendor	0.03	0.01	0.47	0.22	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	316	316	0.01	0.05	0.02	330
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.16	0.13	1.43	0.00	0.00	248	248	0.00	24.8	24.8	—	264	264	0.02	0.01	0.44	269
Vendor	0.02	0.01	0.33	0.15	< 0.005	< 0.005	46.9	46.9	< 0.005	4.69	4.69	—	226	226	0.01	0.03	0.21	236
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.26	0.00	0.00	45.3	45.3	0.00	4.52	4.52	—	43.8	43.8	< 0.005	< 0.005	0.07	44.5
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	8.57	8.57	< 0.005	0.86	0.86	—	37.3	37.3	< 0.005	0.01	0.04	39.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2028) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.39	9.26	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.17	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285	
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.24	0.23	0.14	2.07	0.00	0.00	376	376	0.00	37.5	37.5	—	384	384	0.02	0.02	1.32	390	
Vendor	0.03	0.01	0.42	0.20	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	308	308	0.01	0.04	0.61	322	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.24	0.22	0.19	1.97	0.00	0.00	376	376	0.00	37.5	37.5	—	362	362	0.01	0.02	0.03	367
Vendor	0.02	0.01	0.45	0.21	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	308	308	0.01	0.05	0.02	322
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.17	0.16	0.12	1.34	0.00	0.00	249	249	0.00	24.9	24.9	—	260	260	0.01	0.01	0.41	265
Vendor	0.02	0.01	0.31	0.14	< 0.005	< 0.005	47.1	47.1	< 0.005	4.70	4.71	—	221	221	0.01	0.03	0.19	231
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.24	0.00	0.00	45.4	45.4	0.00	4.54	4.54	—	43.1	43.1	< 0.005	< 0.005	0.07	43.8
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	8.59	8.59	< 0.005	0.86	0.86	—	36.5	36.5	< 0.005	0.01	0.03	38.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Building Construction (2029) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.69	6.13	9.22	0.02	0.20	—	0.20	0.18	—	0.18	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.12	1.68	< 0.005	0.04	—	0.04	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.22	0.13	1.94	0.00	0.00	376	376	0.00	37.5	37.5	—	377	377	0.01	0.02	1.20	383
Vendor	0.03	0.01	0.40	0.19	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	299	299	0.01	0.04	0.54	313
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.23	0.21	0.17	1.84	0.00	0.00	376	376	0.00	37.5	37.5	—	355	355	0.01	0.02	0.03	361
Vendor	0.02	0.01	0.42	0.19	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	299	299	0.01	0.04	0.01	313
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.15	0.11	1.26	0.00	0.00	248	248	0.00	24.8	24.8	—	255	255	0.01	0.01	0.37	259
Vendor	0.02	0.01	0.30	0.14	< 0.005	< 0.005	46.9	46.9	< 0.005	4.69	4.69	—	214	214	0.01	0.03	0.17	223
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.23	0.00	0.00	45.3	45.3	0.00	4.52	4.52	—	42.2	42.2	< 0.005	< 0.005	0.06	42.9
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	8.57	8.57	< 0.005	0.86	0.86	—	35.4	35.4	< 0.005	0.01	0.03	36.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Building Construction (2030) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.12	0.94	8.39	12.9	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.12	0.94	8.39	12.9	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.80	0.67	5.99	9.20	0.02	0.19	—	0.19	0.17	—	0.17	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	1.09	1.68	< 0.005	0.03	—	0.03	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.21	0.12	1.82	0.00	0.00	376	376	0.00	37.5	37.5	—	370	370	0.01	0.02	1.09	376
Vendor	0.02	0.01	0.39	0.18	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	290	290	0.01	0.04	0.48	303
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.20	0.16	1.73	0.00	0.00	376	376	0.00	37.5	37.5	—	349	349	0.01	0.02	0.03	355
Vendor	0.02	0.01	0.41	0.19	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	290	290	0.01	0.04	0.01	303
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.16	0.14	0.10	1.17	0.00	0.00	248	248	0.00	24.8	24.8	—	251	251	0.01	0.01	0.34	255
Vendor	0.02	0.01	0.29	0.13	< 0.005	< 0.005	46.9	46.9	< 0.005	4.69	4.69	—	207	207	0.01	0.03	0.15	217
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.03	0.03	0.02	0.21	0.00	0.00	45.3	45.3	0.00	4.52	4.52	—	41.5	41.5	< 0.005	< 0.005	0.06	42.1
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	8.57	8.57	< 0.005	0.86	0.86	—	34.3	34.3	< 0.005	0.01	0.02	35.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Building Construction (2031) - Unmitigated

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

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.10	0.92	8.12	12.8	0.02	0.24	—	0.24	0.22	—	0.22	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.64	1.01	< 0.005	0.02	—	0.02	0.02	—	0.02	—	188	188	0.01	< 0.005	—	188
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.1	31.1	< 0.005	< 0.005	—	31.2

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.19	0.15	1.60	0.00	0.00	376	376	0.00	37.5	37.5	—	344	344	0.01	0.02	0.03	349	
Vendor	0.02	0.01	0.39	0.18	< 0.005	< 0.005	71.1	71.1	< 0.005	7.10	7.11	—	281	281	0.01	0.04	0.01	293	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.02	0.01	0.01	0.12	0.00	0.00	27.2	27.2	0.00	2.72	2.72	—	27.0	27.0	< 0.005	< 0.005	0.03	27.4	
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	5.14	5.14	< 0.005	0.51	0.51	—	22.0	22.0	< 0.005	< 0.005	0.01	22.9	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	4.96	4.96	0.00	0.50	0.50	—	4.48	4.48	< 0.005	< 0.005	0.01	4.54	
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.94	0.94	< 0.005	0.09	0.09	—	3.64	3.64	< 0.005	< 0.005	< 0.005	3.80	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

3.19. Paving (2031) - Unmitigated

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

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

Off-Road Equipment	0.75	0.63	6.13	9.88	0.01	0.21	—	0.21	0.19	—	0.19	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	0.63	6.13	9.88	0.01	0.21	—	0.21	0.19	—	0.19	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.26	2.03	< 0.005	0.04	—	0.04	0.04	—	0.04	—	310	310	0.01	< 0.005	—	311
Paving	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.23	0.37	< 0.005	0.01	—	0.01	0.01	—	0.01	—	51.4	51.4	< 0.005	< 0.005	—	51.6
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.45	0.00	0.00	100	100	0.00	10.0	10.0	—	97.3	97.3	< 0.005	< 0.005	0.26	98.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.43	0.00	0.00	100	100	0.00	10.0	10.0	—	91.8	91.8	< 0.005	< 0.005	0.01	93.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	19.1	19.1	0.00	1.90	1.90	—	19.0	19.0	< 0.005	< 0.005	0.02	19.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	3.48	3.48	0.00	0.35	0.35	—	3.14	3.14	< 0.005	< 0.005	< 0.005	3.19
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.21. Architectural Coating (2031) - Unmitigated

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

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

Off-Road Equipm	0.12	0.10	0.78	1.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	108	108	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.23	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	27.4	27.4	< 0.005	< 0.005	—	27.5
Architectural Coatings	22.2	22.2	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.54	4.54	< 0.005	< 0.005	—	4.56
Architectural Coatings	4.05	4.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.02	0.34	0.00	0.00	75.2	75.2	0.00	7.51	7.51	—	72.9	72.9	< 0.005	< 0.005	0.20	74.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.06	0.00	0.00	14.3	14.3	0.00	1.43	1.43	—	14.2	14.2	< 0.005	< 0.005	0.02	14.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	2.61	2.61	0.00	0.26	0.26	—	2.35	2.35	< 0.005	< 0.005	< 0.005	2.39
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

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

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

Single Family Housing	5.40	5.14	2.90	24.4	0.05	0.04	2,073	2,073	0.04	207	207	—	4,894	4,894	0.32	0.27	16.5	4,998
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.40	5.14	2.90	24.4	0.05	0.04	2,073	2,073	0.04	207	207	—	4,894	4,894	0.32	0.27	16.5	4,998
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	5.34	5.05	3.41	26.8	0.05	0.04	2,073	2,073	0.04	207	207	—	4,691	4,691	0.39	0.30	0.43	4,790
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.34	5.05	3.41	26.8	0.05	0.04	2,073	2,073	0.04	207	207	—	4,691	4,691	0.39	0.30	0.43	4,790
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.94	0.89	0.57	4.41	0.01	0.01	342	342	0.01	34.1	34.1	—	762	762	0.06	0.05	1.16	778
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.94	0.89	0.57	4.41	0.01	0.01	342	342	0.01	34.1	34.1	—	762	762	0.06	0.05	1.16	778

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

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

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

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	529	529	0.09	0.01	—	534
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	29.9	29.9	< 0.005	< 0.005	—	30.2
Total	—	—	—	—	—	—	—	—	—	—	—	—	559	559	0.09	0.01	—	564
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	529	529	0.09	0.01	—	534
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	29.9	29.9	< 0.005	< 0.005	—	30.2
Total	—	—	—	—	—	—	—	—	—	—	—	—	559	559	0.09	0.01	—	564
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	87.5	87.5	0.01	< 0.005	—	88.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	4.96	4.96	< 0.005	< 0.005	—	5.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	92.5	92.5	0.01	< 0.005	—	93.4

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.18	0.09	1.57	0.67	0.01	0.13	—	0.13	0.13	—	0.13	—	1,995	1,995	0.18	< 0.005	—	2,000

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.18	0.09	1.57	0.67	0.01	0.13	—	0.13	0.13	—	0.13	—	1,995	1,995	0.18	< 0.005	—	2,000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.18	0.09	1.57	0.67	0.01	0.13	—	0.13	0.13	—	0.13	—	1,995	1,995	0.18	< 0.005	—	2,000
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.18	0.09	1.57	0.67	0.01	0.13	—	0.13	0.13	—	0.13	—	1,995	1,995	0.18	< 0.005	—	2,000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.03	0.02	0.29	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	330	330	0.03	< 0.005	—	331
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.03	0.02	0.29	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	330	330	0.03	< 0.005	—	331

4.3. Area Emissions by Source

4.3.1. Unmitigated

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

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.76	4.62	2.66	6.08	0.02	0.88	—	0.88	0.88	—	0.88	66.3	3,223	3,289	0.07	0.01	—	3,295
Consumer Products	6.51	6.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	0.65	0.65	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.82	0.78	0.08	8.86	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.7	23.7	< 0.005	< 0.005	—	23.7
Total	12.7	12.6	2.74	14.9	0.02	0.88	—	0.88	0.88	—	0.88	66.3	3,246	3,313	0.07	0.01	—	3,319
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4.76	4.62	2.66	6.08	0.02	0.88	—	0.88	0.88	—	0.88	66.3	3,223	3,289	0.07	0.01	—	3,295
Consumer Products	6.51	6.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.65	0.65	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	11.9	11.8	2.66	6.08	0.02	0.88	—	0.88	0.88	—	0.88	66.3	3,223	3,289	0.07	0.01	—	3,295
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.62	0.44	0.22	1.99	0.01	0.29	—	0.29	0.28	—	0.28	59.0	175	234	0.28	< 0.005	—	242
Consumer Products	1.19	1.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.12	0.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.10	0.10	0.01	1.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.68	2.68	< 0.005	< 0.005	—	2.69
Total	2.03	1.85	0.23	3.10	0.01	0.29	—	0.29	0.28	—	0.28	59.0	178	237	0.28	< 0.005	—	244

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	12.5	76.2	88.7	1.29	0.03	—	131
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12.5	76.2	88.7	1.29	0.03	—	131
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	12.5	76.2	88.7	1.29	0.03	—	131
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	12.5	76.2	88.7	1.29	0.03	—	131
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	2.07	12.6	14.7	0.21	0.01	—	21.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.07	12.6	14.7	0.21	0.01	—	21.6

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	410
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	410
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	410
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	117	0.00	117	11.7	0.00	—	410
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	19.4	0.00	19.4	1.94	0.00	—	67.9
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	19.4	0.00	19.4	1.94	0.00	—	67.9

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.18	2.18
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.18	2.18
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.18	2.18
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.18	2.18
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.36	0.36
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.36	0.36

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

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

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

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

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

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

Equipm ent Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
-----------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

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

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

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

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

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

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

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

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	4/9/2026	5.00	70.0	—
Site Preparation	Site Preparation	4/10/2026	6/5/2026	5.00	40.0	—
Grading	Grading	6/6/2026	11/7/2026	5.00	110	—
Building Construction	Building Construction	11/8/2026	2/9/2031	5.00	1,110	—
Paving	Paving	2/10/2031	5/26/2031	5.00	75.0	—
Architectural Coating	Architectural Coating	5/27/2031	9/9/2031	5.00	75.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Back hoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Back hoes	Diesel	Average	2.00	8.00	84.0	0.37
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Back hoes	Diesel	Average	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	9.47	LDA,LDT1,LDT2
Demolition	Vendor	—	6.03	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	9.47	LDA,LDT1,LDT2
Site Preparation	Vendor	—	6.03	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	9.47	LDA,LDT1,LDT2
Grading	Vendor	—	6.03	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	56.2	9.47	LDA,LDT1,LDT2
Building Construction	Vendor	16.7	6.03	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	9.47	LDA,LDT1,LDT2
Paving	Vendor	—	6.03	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—

Architectural Coating	Worker	11.2	9.47	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	6.03	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	616,005	205,335	0.00	0.00	3,669

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	60.0	0.00	—
Grading	—	—	330	0.00	—
Paving	0.00	0.00	0.00	0.00	3.12

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
----------	--------------------	-----------

Single Family Housing	1.72	0%
Parking Lot	1.40	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005
2029	0.00	204	0.03	< 0.005
2030	0.00	204	0.03	< 0.005
2031	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	1,473	1,488	1,334	531,087	5,734	5,795	5,193	2,067,909
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—

Wood Fireplaces	5
Gas Fireplaces	140
Propane Fireplaces	11
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	8
Non-Catalytic Wood Stoves	8
Pellet Wood Stoves	11

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
616005	205,335	0.00	0.00	3,669

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

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

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	945,883	204	0.0330	0.0040	6,224,418
Parking Lot	53,575	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	6,521,908	26,134,575
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	218	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

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

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

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

5.16.2. Process Boilers

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

5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

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

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

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

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.75	annual days of extreme heat
Extreme Precipitation	4.10	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	31.3	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

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

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

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

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

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

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	13.6

AQ-PM	2.14
AQ-DPM	48.3
Drinking Water	38.7
Lead Risk Housing	35.3
Pesticides	0.00
Toxic Releases	0.34
Traffic	34.9
Effect Indicators	—
CleanUp Sites	47.7
Groundwater	67.1
Haz Waste Facilities/Generators	59.8
Impaired Water Bodies	77.3
Solid Waste	59.2
Sensitive Population	—
Asthma	21.9
Cardio-vascular	5.50
Low Birth Weights	30.8
Socioeconomic Factor Indicators	—
Education	17.8
Housing	16.3
Linguistic	3.74
Poverty	21.5
Unemployment	11.9

7.2. Healthy Places Index Scores

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

Indicator	Result for Project Census Tract
Economic	—

Above Poverty	87.54010009
Employed	53.74053638
Median HI	75.27268061
Education	—
Bachelor's or higher	77.17182086
High school enrollment	100
Preschool enrollment	88.79763891
Transportation	—
Auto Access	60.64416784
Active commuting	23.97022969
Social	—
2-parent households	72.61645066
Voting	92.99371231
Neighborhood	—
Alcohol availability	58.48838701
Park access	48.18426793
Retail density	44.8222764
Supermarket access	45.8488387
Tree canopy	97.69023483
Housing	—
Homeownership	63.76235083
Housing habitability	85.37148723
Low-inc homeowner severe housing cost burden	60.02823046
Low-inc renter severe housing cost burden	96.29154369
Uncrowded housing	96.93314513
Health Outcomes	—
Insured adults	96.44552804
Arthritis	0.0

Asthma ER Admissions	94.8
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	47.7
Cognitively Disabled	50.3
Physically Disabled	36.0
Heart Attack ER Admissions	99.6
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	66.5
SLR Inundation Area	0.0
Children	71.1
Elderly	2.3
English Speaking	88.3
Foreign-born	18.2

Outdoor Workers	79.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	90.4
Traffic Density	15.6
Traffic Access	0.0
Other Indices	—
Hardship	11.2
Other Decision Support	—
2016 Voting	88.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	8.00
Healthy Places Index Score for Project Location (b)	88.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

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

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

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Size adjusted to serve the same population as a 250-room hotel assuming a STR capacity of 4.8ppl/STR and a hotel capacity of 3ppl/room.

From: [Ammen, Breylen@Coastal](mailto:Ammen.Breylen@Coastal)
To: [Butler, Katie@Coastal](mailto:Butler,Katie@Coastal)
Subject: FW: Comment: Short-Term Rentals in Monterey County
Date: Wednesday, June 25, 2025 9:38:24 AM

From: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Sent: Tuesday, June 24, 2025 3:53 PM
To: Ammen, Breylen@Coastal <breylen.ammen@coastal.ca.gov>
Subject: Fw: Comment: Short-Term Rentals in Monterey County

From: C Molloy - Woodyard BBQ <ciaranjmolloy@gmail.com>
Sent: Tuesday, June 24, 2025 3:42 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Cc: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Comment: Short-Term Rentals in Monterey County

Dear Commissioners:

Firstly may I just say, "Wow!" I have been all over the US and yours was one of the places I have always been excited to see. I, frankly, was blown away by the natural beauty of the entire area. I am originally from Ireland, have been to South of France and lived in Portland for a long time and Monterey was in the same vein as these areas but even more so. At one point I thought to myself it almost looks fake it is so breathtaking but I digress, which leads me to the purpose of my email.

I mentioned to our VRBO host about how we will look forward to returning and her response compelled me to write. My limited understanding is that STR's (Short Term Rentals) of which I availed myself will be coming under review to decide on their continued use there. This was somewhat alarming to me. While I completely understand the committee's need to address STR's and their continuance, I would like to add my opinion.

My family loved it more than I can say, I have 3 teen daughters and this is TRUE, at one point all 3 of them put their phones down to take in the view! I should just end it here. No, seriously they loved it and the beach and ocean more than I can adequately say. Access to the beach and all that comes with it are so important to this generation and all generations for that matter to show them what true beauty is. The people in the businesses, bookstores, restaurants, ice cream parlors, grocery stores etc, to a person, couldn't have been nicer, perhaps it may have something to do with working in a paradisaical environment, an environment that is clearly run by a very caring and smart government, it genuinely shows and I am sure you want to keep it this way.

I know that STR's are a contentious issue in this country and by a lot of rights this is

merited. I understand that your citizens want to keep their beautiful part of the world just that - beautiful and charming. While I understand arguments against STR's, big parties, lots of guests, loud music, late nights, disrespect to neighbors etc are a very legitimate concern, I really don't see that to be much of one for your area. It simply doesn't attract the aforementioned crowd, I am sure there have been the odd problems throughout the advent of STR's, however, I can't imagine this being much of a concern as the people who want to visit your area aren't looking for that kind of scene.

Succinctly I really think that any talk of banning or curtailing STR's needs to be given very serious consideration. The obvious: economy through tourism but the more subtle letting the world see one of the most beautiful places on this planet. Hotels are expensive and can be impersonal. We love to have a glass of wine and cook etc. Access to the ocean and beach for regular families such as mine is so important. The more I have delved into some of the options, I understand that a two week minimum is being looked at. I can say from my perspective we couldn't stay for that long with work and school etc. Making a two week minimum would be, to my mind, a death knell for 90% of the STR's as that is too long for most young families to take. I wouldn't have been able to visit had that been the case. We came from Kansas City and we are short on beaches here! I want my kids to have those memories and all that comes with it. I truly feel that your government can continue to be the great stewards of this area while still listening to its citizens. This is a very important balance and one that is being maintained and can continue to do so without banning STR's or their like. In the end of the day it's all about balance and you guys display that so well.

I appreciate your taking the time to read this and I HOPE to see your wonderful area again!

Thank you,

Ciaran J Molloy

Ciaran Molloy 913-553-1661

woodyardbbq.com

From: ExecutiveStaff@Coastal
To: CentralCoast@Coastal
Subject: FW: Letter regarding STR's in Pebble Beach for tomorrow's meeting
Date: Tuesday, March 11, 2025 9:21:00 PM
Attachments: [CCSTR 3.11.25.docx](#)

fyi

From: Kristansnarf <kristansnarf@aol.com>
Sent: Tuesday, March 11, 2025 2:39 PM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Letter regarding STR's in Pebble Beach for tomorrow's meeting

I would like to submit a letter regarding STR's in Pebble Beach for tomorrow's review.

I have attached it here and will copy and paste in hopes either option makes easy to include my experience as a full-time resident:

March 11, 2025

Dear Coastal Commission,

Please review the allowance of STR's in the neighborhoods of Pebble Beach. What we are experiencing brings concerns of safety for us, as well as First Responders, inappropriate noise for our usually peaceful forest, and inappropriate behavior.

Many of us worked very hard to be fortunate to call this wonderful slice of paradise home, and these STR's along with the nightly renters who don't care because they are "on vacation" do not make for good neighbors.

One of the many things we fell in love with our Huckleberry Hill area was that it is normally quite peaceful. We are blessed to know every person, and every dog who walk down our street, and frequently stop for wonderful conversations with our neighbors.

This peace and tranquility has been interrupted by the number of annoyances with the STR directly across the street, and we are fed up with it!

The owners have rented it to a company which then rents it out nightly. It is a large house, so they advertise it sleeps 15+ people (which is against rules already). They have converted the multi-car garage into a game room with air hockey, pool table,

as well as video games with the garage doors wide open during all hours.

As if the noise from the garage isn't enough, with multiple people, comes multiple cars on our tiny, and very narrow street. If you have ever tried to find Huckleberry Hill, you know it can be a challenge. Not only do they speed down our street which is terrifying due to the number of humans, and canines out for their stroll, they use any driveway they choose to turn around, and frequently park along the street, sometimes blocking our driveway, or our mailbox. We have been very fortunate so far, but if something were to happen, there is no way a firetruck, let alone an ambulance would be able to navigate through the vehicles, and there's no way a firetruck would have room anywhere on our street to even think about turning around.

These people don't care, and several times when we have tried to ask nicely about either noise, or parking, we have been met with a less than amiable attitude which makes us worry about potential retaliation.

I don't care what you pay to sleep here, this is our neighborhood, and it belongs to the neighbors! We do not have any coastal access at the top of the hill, and there are enough hotels in the area, go stay there, and support the infrastructure, and jobs that are already put in place.

Thank you for your consideration,
Kristan Neubecker
Costado Road
Pebble Beach

From: CentralCoast@Coastal
To: Ammen_Breylen@Coastal
Subject: Fw: March 13, 2025
Date: Tuesday, February 25, 2025 1:08:01 PM
Attachments: [image6.jpeg](#)
[image0.jpeg](#)
[image3.jpeg](#)
[image001.jpg](#)
[PHN_PLN240020_031325.pdf](#)

From: Katherine Wenglikowski <kathweng@gmail.com>
Sent: Tuesday, February 25, 2025 1:03 PM
To: Taylor Price <pricet1@countyofmonterey.gov>
Cc: CEcomplaints <cecomplaints@co.monterey.ca.us>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; 100-District 5 647-7755 <district5@co.monterey.ca.us>
Subject: March 13, 2025

Hi Taylor and All County Cohorts and The California Coastal Commission,

First off, thank you again for all your conscientious work and attention to detail regarding STRs. Here in the Yankee Point neighborhood, we are anxiously awaiting the CCC certification of the Ordinances affecting STRs in the low density, single family coastal zones of Monterey County based on the Carmel Land Use terms.

What I don't understand about the application below is how these owners can be asking for something which has yet to be certified. Has Pebble Beach retained a different set of rulings outside of the ones set forth by the County? It's all getting to be so difficult to understand. If Pebble has its own rules then so be it but down at our end of Highway 1, the STR problem remains toxic.

We are having such a difficult time with the light pollution in the Carmel Highlands. Our neighbors who host two very active commercial STRs do not have any rules or protocols for asking their guests to turn off outdoor lights at night. When the upstairs exterior, unhooded, spotlights at 142 Carmel Riviera Dr. get left on, they shine directly into our bedroom wreaking havoc on our sleep. This definitely affects our quality of life. And we live next to and across from not one but two giant rentals run by the same team.

The short term renters are not to blame. They don't realize the outdoor lights are a problem and frankly half of them don't know where the correct light switch is. The fault lies with the host who seems oblivious to any and all concerns. I know the house well. We knew the previous owners, the Violini's and have been to the house many times. There are two switches inside the house in two different locations for the same lights so tenants may think they are turning lights off lights before going to bed by pressing the off switch but since there are two switches, they have actually turned the lights on. This has been going on for close to two years now.

As we do have any contact information for the host nor owner, my husband is forced to walk over whenever the lights get left on to ask if they will kindly turn them off. We choose to respectfully only do this during daylight hours so as not to scare anyone at the door. The

problem is daytime is not usually when the lights get on. They get accidentally turned on and left on in the evening. Without fail when we reach a renter at the house, they willingly oblige, sometimes feeling embarrassed which we don't intend for them to feel.

But Taylor, should the onus of rectifying this issue be on us or the host? Should we be going over to a "stranger's" home asking for favors? I don't know...it could lead to a weird confrontation someday and we definitely don't want that.

To be clear, what I'm asking for is some real help from the County. We have no contact information for the host (Ryan Murphy) nor the owner. Could you or someone from Code Enforcement perhaps reach out to them and ask for some neighborly consideration. Perhaps they could put the lights on an app or timer. Perhaps they could disconnect one of the switches and label the other politely asking guests to turn off the outdoor lights at a reasonable hour. Below are some photo examples of the kind of light we are talking about.

Please advise.

Kindest regards always,

Katherine Wenglikowski
(Please redact all names and addresses if publishing)



Begin forwarded message:

From: "Ruiz, Liliana" <RuizL3@countyofmonterey.gov>

Date: February 25, 2025 at 11:50:57 AM PST

Subject: Public Hearing Notices for items scheduled before the Zoning Administrator on March 13, 2025

Good Morning,

Please see the attached notices for items scheduled before the Zoning Administrator on March 13, 2025.

Thank you,



Liliana Ruiz
Office Assistant II
Housing and Community
Development

1441 Schilling Place, South 2nd
Floor
Salinas, CA 93901-4527

Phone: (831) 755-5025
Direct: (831) 755-4813

ruizl3@countyofmonterey.gov

From: [Ammen, Breylen@Coastal](mailto:Ammen.Breylen@Coastal)
To: Butler, Katie@Coastal
Subject: FW: Monterey County STR Ordinance
Date: Thursday, June 26, 2025 9:57:36 AM

Breylen Ammen
Coastal Planner | Monterey County

CALIFORNIA COASTAL COMMISSION
725 Front Street, Suite 300
Santa Cruz, CA 95060
(831) 427-4863

-----Original Message-----

From: Susan Layne <sjlayneappraiser@gmail.com>
Sent: Thursday, June 26, 2025 9:54 AM
To: Ammen, Breylen@Coastal <breylen.ammenn@coastal.ca.gov>
Subject: Monterey County STR Ordinance

Hello Breylen,

As a resident of Carmel Highlands I was looking forward to a decision by the Coastal Commission, delayed in February of this year, to approve the County of Monterey's plan to limit and otherwise restrict Short Term Rentals in our low- density residential neighborhood.

I just now called your office as I was unable to find an agenda item for your July meetings on this subject. This lack (hopefully a correctable oversight ?) was confirmed by your office and I was referred to you for further information.

Please let me know what is going on! I am a long term renter, priced out of this neighborhood as a purchaser by the insanelly inflated purchase prices by investors who immediately convert the Single Family Residence to an STR lacking sufficient water or septic capacity to service what becomes, for all intents and purposes, a hotel.

Monterey County lacks any ability to enforce the unratified ordinance, and to my mind, are incapable of governing much of anything. At the first whiff of a challenge from speculative investors the County Counsel halts all enforcement? Are you kidding me? I'm semi- retired now but never in my life have I observed someone declaring that they are now unable to do their job! Such blatant abandonment of duty to citizens of an area!

Now this beautiful community zoned for Single Family Occupancy is a hotbed for large groups of partiers (due to the size of the homes) who don't care a whit about conserving the coast - which is your mandate, I believe. I could recite the list of issues beyond the overflowing septic tanks like noise, the alleged shooting of a firearm into a neighboring house, the cherry bombs mistaken for shotgun blasts on the 4th of July 3 years ago that had an elderly neighbor set off her intrusion alarm to summon help as she was too frightened to get to her phone, while I called the Sheriff while sheltering in my bathtub, the dangerous idiot staying at an STR up the street arrested for going 115 mph ~ on the wrong side of the highway 300 yards ~from my home, not to mention the large, unknown, off leash dogs defecating everywhere- which is perhaps the most apt visual representation of these invaders.

When is the Coastal Commission going to do its job and actually protect and preserve the coast in Monterey County?

Most sincerely,

Susan Layne

Susan Layne

Certified Residential Appraiser

CA Lic#AR033609

Sjlayneappraiser@gmail.com

831-383-2441

Sent from my iPhone

From: [Ammen, Breylen@Coastal](mailto:Ammen.Breylen@Coastal)
To: [Butler, Katie@Coastal](mailto:Butler.Katie@Coastal)
Subject: FW: Protect Carmel Highlands/Support Title 20
Date: Tuesday, June 17, 2025 2:52:50 PM

From: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Sent: Tuesday, June 17, 2025 2:46 PM
To: Ammen, Breylen@Coastal <breylen.ammen@coastal.ca.gov>
Subject: Fw: Protect Carmel Highlands/Support Title 20

From: Patricia Brukoff <pbrukoff@gmail.com>
Sent: Tuesday, June 17, 2025 2:38 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: Protect Carmel Highlands/Support Title 20

To: California Coastal Commission / Monterey County Board of Supervisors

Subject: Support for Title 20 – Protecting Residential Zones and Coastal Resources

Dear Commissioners / Supervisors,

I write in strong support of **Title 20** and its proposed restrictions on short-term rentals (STRs) in the coastal zone — particularly in **residential areas like Carmel Highlands**, where these commercial operations are incompatible with neighborhood character, infrastructure capacity, and environmental protections.

Contrary to claims that STRs in our neighborhood are essential to meeting the Coastal Act's goals for lower-cost visitor access,

the facts say otherwise:

-

There is **ample visitor-serving lodging nearby** — including in **Carmel, Carmel Valley, and Big Sur** — that offers a range of accommodations at varying price points, including modest motels, inns, and host-occupied rentals.

-

Public beach access in our neighborhood is fully open 24 hours a day — ensuring that all Californians can enjoy the coast **regardless of where they stay**.

-

Luxury STRs sleeping 12–16 guests are not, by any honest standard, “lower-cost accommodations.” These are high-end homes marketed to large parties and tourists seeking exclusivity, not affordability.

In addition, this area is **zoned for low-density, single-family living and depends on septic systems** — none of which were designed to support high-turnover, high-occupancy lodging businesses. The result is strain on infrastructure, increased environmental risk, and the erosion of neighborhood stability.

Worse, the commercialization of homes in quiet residential zones has **already resulted in public safety concerns**. In April, a verified shooting occurred at a short-term rental in Carmel Highlands — an unacceptable escalation of risk to residents and visitors alike. This is not a hypothetical problem.

Monterey County spent nine years carefully crafting Title 20 through extensive public input, balancing visitor access with the need to protect natural resources, residential character, and public safety. The resulting policy is **measured, lawful, and consistent with the Coastal Act.**

I urge the Coastal Commission to **certify Title 20 in full**, without weakening its core protections. Lower-cost lodging is already available nearby. Public access is already guaranteed. What we need now is **protection from the unchecked spread of high-impact, unregulated vacation rentals in places they simply do not belong.**

Thank you for your leadership in preserving California's coast — not just for visitors, but for the people who live here and care for it every day.

Sincerely,

Patricia Brukoff

Full time resident

Carmel Highlands 93923

From: [Ammen, Breylen@Coastal](mailto:Ammen.Breylen@Coastal)
To: [Butler, Katie@Coastal](mailto:Butler,Katie@Coastal)
Subject: FW: Public Commend: Short-Term Rentals in Monterey County"
Date: Monday, June 23, 2025 1:00:42 PM
Attachments: [Sadie Vacation Photos .pdf](#)

From: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Sent: Monday, June 23, 2025 12:36 PM
To: Ammen, Breylen@Coastal <breylen.ammen@coastal.ca.gov>
Subject: Fw: Public Commend: Short-Term Rentals in Monterey County"

From: S Thomas <sadieethomas@gmail.com>
Sent: Monday, June 23, 2025 12:23 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>; ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Public Commend: Short-Term Rentals in Monterey County"

June 23, 2025

Dear Commissioners,

My wife and I are writing to urge you to continue supporting short-term rentals along the California coast—particularly in areas like the Carmel Highlands in unincorporated Monterey County.

I grew up in this region, and I now live in Colorado, a landlocked state. Returning to the coast has become a cherished tradition for my family. Each year, my children look forward to seeing the ocean, playing in the sand and spotting sea otters along the shoreline. These moments are more than just memorable—they're deeply meaningful, especially for my youngest, who is immunocompromised which makes traveling more difficult. It is necessary for us to avoid hotels, which can be crowded, less hygienic, noisy, and unaccommodating for families with younger children. We need the privacy, safety, and cleanliness of a stand-alone home where I can cook nutritious meals, do laundry, and control our environment. I've heard proposals for "hosted" rentals, which would undermine our needs. For my family, a private rental is the only way to find true comfort and connection on the coast.

Hotels are simply not an option for us: the shared spaces, unpredictable neighbors, and the hassle of parking all present unnecessary risks, costs and stress. In contrast, staying at a home in the Carmel Highlands allows us to pull into a garage, safely store our belongings, and enjoy peaceful walks through the neighborhood to the beach—without crowds.

Please understand that short term rental homes like this are not only essential for families like mine, but also serve to support the local economy and promote responsible, respectful tourism. We prefer to return to the same house year after year, and have forged new friendships with the host and surrounding neighbors. We always treat the home and neighborhood with care, shop at local stores, and contribute to the community with every stay.

Thank you for considering the real human impact of these policies. Families like mine rely on the ability to visit the California coast in a safe and meaningful way—and short-term rentals make that possible. Please

enjoy a few photos from a trip we took with our two daughters over the holidays.

Warm regards,

The Gawronski Family





From: CentralCoast@Coastal
To: Ammen.Breylen@Coastal; Butler.Katie@Coastal
Subject: Fw: Public Participation Comments for 3/12 Meeting
Date: Wednesday, March 12, 2025 8:03:13 AM

Get [Outlook for iOS](#)

From: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Sent: Tuesday, March 11, 2025 9:33:06 PM
To: CentralCoast@Coastal <CentralCoast@coastal.ca.gov>
Subject: FW: Public Participation Comments for 3/12 Meeting

fyi

From: MEGAN MAYER <mgmayerlaw@comcast.net>
Sent: Tuesday, March 11, 2025 10:37 AM
To: ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: Public Participation Comments for 3/12 Meeting

Dear Executive Staff,

Pursuant to Public Participation Procedures for the upcoming March 12 Meeting in Santa Cruz, please include our following comments to be submitted.

As residents of Pebble Beach, my wife having grown up here since the early 1960's, we request that the California Coastal Commission ban short term rentals within Pebble Beach for 4 reasons.

1) Visitors do not understand or protect our delicate forest and coastal ecosystem the way residents do, greatly increasing our risk of fire by tossing lit cigarettes on the ground at their rentals or from their cars and by putting live fuel (branches, pine needles, pinecones, etc.) on top of gas pits in outdoor entertainment areas.

2) Use of single-family residences as short-term rentals guts the community of a neighborhood, reducing the support network we each have during severe weather and fire. As a retirement community, our elderly neighbors are at greater risk of fire from item 1 above, and less likely to receive support because of the changed neighborhood.

3) Short-term rentals put children at risk. There is no jurisdiction that requires sex offenders to register vacation travel, so letting our children play in the neighborhood is a new risk with each new renter. Long-term rentals require registration and permit residents to know who is living where on our street. Thus, STRs gut Megan's Law protections for children.

4) STR tenants regularly violate permitted use of residential property. STR tenants in Pebble Beach use rentals to run commercial events and businesses during Car Week, PB Food and Wine, AT&T, Laguna Seca events, etc. Two houses on our street have been rented jointly in the past - multiple times - with the many tenants running an exotic car rental business, where customers can rent exotic cars to test by the hour. The property was a sea of men in their 20's and 30's, smoking and partying loudly outside. Since they were from another country's time zone (many of their license plates were in Arabic), these car rentals took place at 2AM, 3AM, 4AM, etc., with each new renter revving up their engines to zip through the forest. They also hosted large events on site with shuttle buses coming and going, and had dozens of cars at the property (and on the street) at all times. We heard some of the men harassing our neighbors' girls and their friends while the girls were in their front yard (reference Item 3 re: Megan's Law). The entire neighborhood felt hijacked for the week each time.

Please stop this misuse of land in Pebble Beach, treat it more like Big Sur, and protect our forest, coast, and community.

Respectfully submitted,
Doug Mayer, MD
Megan Mayer
3066 Strawberry Hill Road
Pebble Beach, California 93953
mgmayerlaw@comcast.net
(949) 838-5896

From: CentralCoast@Coastal
To: Ammen_Breylen@Coastal
Subject: Fw: Shots fired at an occupied home in the Carmel Highlands - Sheriff Case #2502039
Date: Friday, May 2, 2025 12:10:36 PM
Attachments: [AP1GczPvHeCHelx8EIG2EVaYuuWISOPbK4TZps7E1P53_e9hfDRaxoVQkaMDOtH7KFHAz9wFsm1M6EZSruCz6pirbnidyZ8a1Pxs3OKMOLDvRTAKMOOFH=w600-h315-p-k.jpeg](#)

From: Katherine Wenglikowski <kathweng@gmail.com>

Sent: Friday, May 2, 2025 11:56 AM

To: zahearingcomments@countyofmonterey.gov <zahearingcomments@countyofmonterey.gov>; spencerc@countyofmonterey.gov <spencerc@countyofmonterey.gov>; cob@countyofmonterey.gov <cob@countyofmonterey.gov>

Cc: 100-District 5 647-7755 <District5@co.monterey.ca.us>; District4@co.monterey.ca.us <District4@co.monterey.ca.us>; District3@co.monterey.ca.us <District3@co.monterey.ca.us>; District2@co.monterey.ca.us <District2@co.monterey.ca.us>; District1@co.monterey.ca.us <District1@co.monterey.ca.us>; CraigK@countyofmonterey.gov <CraigK@countyofmonterey.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

Subject: Shots fired at an occupied home in the Carmel Highlands - Sheriff Case #2502039

Dear Board of Supervisors, Clerk of the Board and Craig Spencer,

It may be too late to add commentary for today's Monterey County Zoning meeting but I hope not. This does not need to be addressed today but it is urgent and does require attention.

On April 17 into April 18h between midnight and 3am, shots were fired into an occupied home at 101 Yankee Point Dr. in the Carmel Highlands. These shots were heard and notated by our neighbor, Gary LeBlanc. Gary did not report the gunfire to the sheriff at the time because these shots easily could have been fired by a car on Hwy 1 but he noted the date and time. A few days later, on April 22nd, the owners of the home that was shot at, Nisha and Achal Patel were in their backyard when they saw gunshots piercing the exterior walls and windows of their home. At this point, the owners of the home, the Patels called the sheriffs who came to take an incident report. From the perspective of the deputy, the shots most likely came from the house behind them but nothing was done to follow up. As word spread to neighbors, Gary, the neighbor who had heard the shots called the sheriff to share the information he had about what time the shots were fired.

While we don't understand why, Deputy Perez took the report on April 22nd, filed his report and closed the case without further investigation. What??? I mean, REALLY, what? No follow up? No investigation?

Perhaps with pressure from within the county (?) or perhaps because a matching bullet casing was retrieved from the Airbnb property directly behind the Patel's home, the case has been reopened. With Deputy Perez off for a few days, Deputy sheriff Shaun Moran stepped in and returned to the scene of the crime to relook at the evidence and determine where the bullets had been fired from. Please review the Sheriffs' report and it will show unequivocally that the gunfire came from the Airbnb located directly behind the Patels at 129 Carmel Riviera Dr.

Frankly, most of the neighbors don't care who the guest was that shot the bullets. Who we want held accountable are the owners of the home (Sifuei and Yolanda Ku who lives up in Palo Alto (650) 279-1077), and uses the Management company Monterey Bay Rentals run by Michael Weiderhollt (Michael@montereyrentals.com 831-601-0532) and Jan Leasure Jan@montereyrentals.com 831-402-1765) to run his property. Monterey Rentals then leases to Ryan Murphy on a monthly basis and Ryan Murphy sublets the place on, Airbnb. Host Ryan Murphy has a history of reckless business practices (please check out all the court records against him in Monterey County) and lastly we want to hold Airbnb accountable.

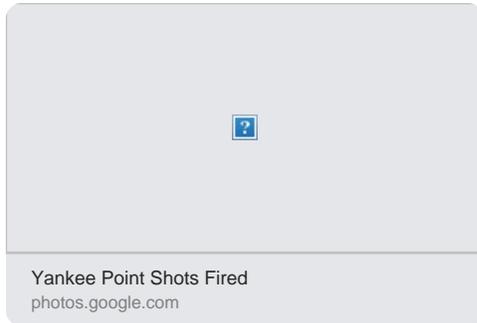
With the hopes that the County and the California Coastal Commission would deem commercial STRs inconsistent with our current zoning as a Low density/Single Family/Coastal neighborhood, we have managed to put up with the rampant escalation of Airbnbs on our streets, three of which are under the management of Ryan Murphy and Monterey Bay Rentals, We have tried to keep our complaints to a minimum lately as we patiently wait for the Coastal Commission to put the issue of commercial STRs in the coastal zone on its docket. But with the onset of a crime involving gunfire into an occupied home, we can no longer sit by and be quiet. We have children and grandchildren. We have animals. We have friends and loved ones in this neighborhood, many of whom are elderly. But most importantly, we have scared neighbors who have just moved into their new home and they've been shot at.

I ask you all, "What would you do if there was a shooting incident into an occupied home in your own neighborhood

and it was determined that the shots fired came from an active Airbnb? Would this be acceptable to you?" We need some help and some attention down here right now. To put it mildly, the neighborhood is having a collective apoplectic seizure. Please review the sheriff's report. New details were added yesterday. We are asking you to demand a thorough investigation and hold someone accountable.

Please advise,

Katherine Wenglikowski
138 Carmel Riviera Dr.



FG2502039

April 22, 2025 at 4:18 PM

Incident Information:

Date: 04/22/2025 04:18 PM

Location: YANKEE POINT DR, CARMEL

Officer: PEREZRF

Description: DEPUTIES RESPONDED TO A REPORT OF A SUSPICIOUS CIRCUMSTANCE

Charges: FIREARMS

Suspect Status:

Victim(s):

Victim>> 56 year old male

Shared from the Monterey County Sheriff app at

From: [Andrew Hall](#)
To: justin.cummings@santacruzcountyca.gov
Cc: CentralCoast@Coastal
Subject: Hello from the Contact Page
Date: Monday, February 24, 2025 11:30:04 AM

Project Name and Application Number: Monterey County Local Coastal Program (LCP)
Amendment Number LCP-3-MCO-24-0039-1 (Vacation Rentals)

Nature of Communication (In Person, Telephone, Other): Email

Date and Time Requested: 2/24/2025 11:30AM

Full Name: Andrew Hall

Email: andrewhall89@gmail.com

On Behalf Of: Andrew Hall

Comments:

Dear Chair Cummings,

I hope you're doing well! We met at Shanie & Molly's wedding last fall, and I want to take a moment to express my appreciation for your leadership—not just as Chair of the California Coastal Commission, but also for your dedicated service as Mayor of Santa Cruz. I fully support your commitment to balancing environmental protection, housing needs, and community interests is truly commendable.

I wanted to reach out regarding Monterey County's proposed short-term rental (STR) ban in Big Sur, as it will have profound consequences for many local residents, including my mother.

My mother is elderly and disabled, and she depends on renting a small cabin for her livelihood. Her rental, like many others in Big Sur, is not suitable for long-term housing, as it lacks the amenities and infrastructure needed for full-time occupancy. Furthermore, most STR operators in the area, including my mother, live on-site and actively manage their properties, ensuring they have no negative impact on the surrounding community.

The County has argued that STRs contribute to traffic congestion, but this claim does not align with reality. Short-term guests visit for a few days at a time and often stay on-site, enjoying the natural surroundings, whereas long-term rentals would introduce full-time residents with daily commuting needs, ultimately increasing traffic impacts. STRs also create local jobs and provide a valued memories for many that get to experience and access this beautiful area. [Here](#) is a great fact check of Monterey County's claims.

Perhaps most concerning, an outright ban will force many local STR owners—who have lived in and cared for Big Sur for decades—to sell their properties. In many cases, these properties will be purchased by absentee landowners, further reducing local housing availability rather than increasing it! If the goal is to preserve the character of Big Sur and protect community stability, a complete ban will likely have the opposite effect.

I fully understand the need for regulation, but I urge the Commission to reject an extreme, one-size-fits-all approach. A more balanced policy—one that protects responsible, resident-operated STRs—would better serve both the local community and the broader goals of the Coastal Act.

I would greatly appreciate the opportunity to discuss this matter further and share insights on how STRs can coexist with Big Sur's environmental and community interests. Thank you for your time and consideration, and for all the work you do in both your role at the CCC and for the people of Santa Cruz.

Best regards,

Andrew Hall

Proud Caring Resident of the Westside and Big Sur

PS. Keep up the good work on the "ban the butts" and "gas leaf blower" initiatives!

Public comments submitted to the Coastal Commission are public records that may be disclosed to members of the public or posted on the Coastal Commission's website. Do not include information, including personal contact information, in comments submitted to the Coastal Commission that you do not wish to be made public. Any written materials, including email, that are sent to commissioners regarding matters pending before the Commission must also be sent to Commission staff at the same time.