

**AIR QUALITY CONFORMITY ASSESSMENT  
LAKE JENNINGS MARKET PLACE  
SAN DIEGO, CA**

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## REPORT CONTENTS

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<b>INTRODUCTION AND DEFINITIONS</b>	<b>1</b>
Existing Site Characterization	1
Project Description	1
Air Quality Definitions	7
<b>ENVIRONMENTAL SIGNIFICANCE THRESHOLDS</b>	<b>9</b>
California Environmental Quality Act (CEQA) Thresholds	9
CEQA Air Quality Screening Standards	9
SDAPCD Criteria Pollutant Standards	11
Combustion Toxics Risk Factors	13
<b>APPROACH AND METHODOLOGY</b>	<b>14</b>
Ambient Air Quality Data Collection	14
Construction Air Quality Modeling	18
Aggregate Vehicle Emission Air Quality Modeling	21
Traffic Segment Pollutant Concentration Modeling	22
Fixed Source Emissions Modeling	22
<b>CONFORMITY FINDINGS</b>	<b>23</b>
Existing Climate Conditions	23
Existing Air Quality Levels	25
Project Construction Emission Findings	30
Odor Impact Potential from Proposed Site	40
Project Vehicular Emission Levels	41
Predicted Traffic Segment Pollutant Concentration Levels	42
Predicted Operational Emission Levels	49
<b>CONCLUSIONS AND RECOMMENDATIONS</b>	<b>51</b>
<b>CERTIFICATION OF ACCURACY AND QUALIFICATIONS</b>	<b>52</b>
<b>APPENDICIES AND SUPPLEMENTAL INFORMATION</b>	<b>53</b>
SCREEN3 Model Output for Criteria Pollutants: CO, NO <sub>x</sub> , SO <sub>x</sub> , and PM <sub>10</sub>	53
EMFAC 2011 EMISSION FACTOR TABULATIONS – SCENARIO YEAR 2020	60
CALINE4 SOLUTION SPACE RESULTS – SCENARIO CO	61
CALINE4 SOLUTION SPACE RESULTS – SCENARIO NO <sub>x</sub>	63
CALINE4 SOLUTION SPACE RESULTS – SCENARIO PM <sub>10</sub>	64
<b>INDEX OF IMPORTANT TERMS</b>	<b>65</b>

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## LIST OF TABLES

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TABLE 1: LAKE JENNINGS MARKET PLACE PROJECT COMPONENTS .....	2
TABLE 2: THRESHOLDS OF SIGNIFICANCE FOR AIR QUALITY IMPACTS .....	12
TABLE 3A: CARB AEROMETRIC DATA ANALYSIS (PANEL 1).....	26
TABLE 3B: CARB AEROMETRIC DATA ANALYSIS (PANEL 2).....	27
TABLE 3C: CARB AEROMETRIC DATA ANALYSIS (PANEL 3).....	28
TABLE 4: AMBIENT AIR QUALITY MONITORING RESULTS .....	30
TABLE 5: ANTICIPATED CONSTRUCTION GRADING PHASING PLAN.....	31
TABLE 6: PREDICTED WORST-CASE DIESEL CONSTRUCTION ENGINE EMISSIONS.....	32
TABLE 7: PREDICTED ONSITE DIESEL-FIRED CONSTRUCTION EMISSION RATES .....	37
TABLE 8: SCREEN3 PREDICTED DIESEL-FIRED EMISSION CONCENTRATIONS.....	38
TABLE 9: OPERATIONAL TRIP EMISSIONS .....	42
TABLE 10A: INCREMENTAL POLLUTANT INCREASES (EXISTING) .....	43
TABLE 10B: INCREMENTAL POLLUTANT INCREASES (EXISTING + PROJECT) .....	44
TABLE 10C: INCREMENTAL POLLUTANT INCREASES (CUMULATIVE).....	45
TABLE 10D: INCREMENTAL POLLUTANT INCREASES (CUMULATIVE + PROJECT).....	46
TABLE 10E: INCREMENTAL POLLUTANT INCREASES (GENERAL PLAN) .....	47
TABLE 10F: INCREMENTAL POLLUTANT INCREASES (GENERAL PLAN + PROJECT).....	48
TABLE 11: AGGREGATE EMISSIONS SYNOPSIS .....	51

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## LIST OF FIGURES / MAPS / ADDENDA

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FIGURE 1: PROJECT STUDY AREA VICINITY MAP .....	3
FIGURE 2: PROJECT STUDY AREA PARCEL MAP .....	4
FIGURE 3: AERIAL IMAGE SHOWING SURROUNDING USES.....	5
FIGURE 4: PROPOSED LAKE JENNINGS MARKET PLACE DEVELOPMENT MAP .....	6
FIGURE 5: AMBIENT AIR QUALITY STANDARDS MATRIX .....	10
FIGURE 6: AMBIENT AIR QUALITY MONITORING STATION LOCATION MAP.....	16
FIGURE 7: AMBIENT AIR QUALITY SAMPLING LOCATION .....	17
FIGURE 8: LABORATORY MASS SPECTROMETRY TEST SETUP.....	18
FIGURE 9: PROJECT AIR BASIN AERIAL MAP.....	24
FIGURE 10: SPECTRAL CONTENT OF AMBIENT AIR SAMPLE AQ 1 .....	29
FIGURE 11: PREDICTED COMBUSTION-FIRED DIESEL PM <sub>10</sub> DISPERSION PATTERN .....	39

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## **INTRODUCTION AND DEFINITIONS**

### **Existing Site Characterization**

The project site consists of approximately 13.1 gross acres located within the eastern portion of San Diego County, as shown in Figure 1, on Page 3. The site parallels an approximately 1,000 foot stretch of Olde Highway 80 adjacent to the north, and is bordered on the west by Ridge Hill Road, and on the east by Rios Canyon Road. The Los Cocheros Creek flood line marks the southern boundary of the project area. The site delineation can be seen in Figure 2.

The site and surrounding community consists of semi-rural land with the immediate project vicinity consisting of vacant undisturbed land, two vacant residential structures, and several local businesses north of the site, which can be seen in Figure 3. Land uses to the east and south of the project site include the Pecan Park Mobile Home Park, and the Rio Vista housing development, respectively.

Elevations onsite range from approximately 650 feet above mean sea level (MSL) at the southwestern corner of the project site to 700 feet above MSL at the northeastern edge.

### **Project Description**

The proposed Lake Jennings Market Place project would consist of a mix of commercial uses. Applicant improvements to the site would include infrastructure such as sewer, road improvements and utilities, the vacation of an existing paved road, and dedication of a biological open space easement, on the aforementioned 13.1 acre site. The proposed site development plan is shown in Figure 4. Specifics of the plan are detailed below as follows:

#### Project Access

The project requires four access points for proper traffic flow. These ingress/egress points are from Ridge Hill Road located on the west side of the project, a right-in (only) approximately 200 feet east of the intersection of Olde Highway 80 and Lake Jennings Park Road, a full signalized project entry half-way along the project frontage of Olde Highway 80, and a second non-signalized project entry (right in – right out only) near the northeast corner of the property.

#### Commercial Shopping Center

The project proposes to construct a commercial shopping center with 76,100 square feet (s.f.) of building area. The project would include six structures, all of which will be located on individually parceled lots according to the breakdown shown in Table 1 on the following page.

**TABLE 1: Lake Jennings Market Place Project Components**

Structure	Indicated on Site Plan As	Size	Location
Market Building	Building A	43,000 s.f.	Along the east side of the project site adjacent to Rios Canyon Road
Financial Building	Building B	4,500 s.f.	On the northeast intersection of Olde Highway 80 at the proposed signalized project entrance.
Restaurant	Building C	3,500 s.f.	Same as Building B above.
Restaurant-Retail Building	Building D	9,600 s.f.	Along the southern boundary of the project's developed area
Gas Station with convenience store and car wash	Building E	3,000 s.f. (43,800 s.f. pad)	At the intersection of Olde Highway 80 and Lake Jennings Park Road.
Restaurant-Retail Building	Building F	12,500 s.f.	Along the southern boundary of the developed area.

Trail Component / Walls and Signage

The project will construct a multi-use trail suitable for pedestrians and equestrian users. The trail will be 10 feet wide and constructed of decomposed granitic material. The trail segments are proposed as standard pathways per the Park Lands Dedication Ordinance (PLDO). The trail segment within the open space lot will run along the southern edge of the development area footprint within a 20-foot-wide trail easement.

There will be a comprehensive sign program for the project. It would include a Freeway Pylon Display, Monument Center ID Displays, Monument Signage at the signalized entrance on Olde Highway 80, and a State of California Gas Pricing Sign.

Parking and Landscaping

The project proposes 389 parking spaces in accordance with the County of San Diego Zoning Ordinance located almost entirely within the central portion of the site, and out of the casual view of surface street traffic. Therefore, the project meets the parking requirements of the County of San Diego Zoning Ordinance.

Finally, a landscape plan has been prepared for the project that incorporates a variety of species intended to provide a visual buffer from Interstate 8 (I-8), and be compatible with the Los Coches Creek riparian zone. The plant palette reflects a selection of Southern California native plant material.







**FIGURE 3: Aerial Image Showing Lake Jennings Market Place and Surrounding Uses (ISE 7/14)**

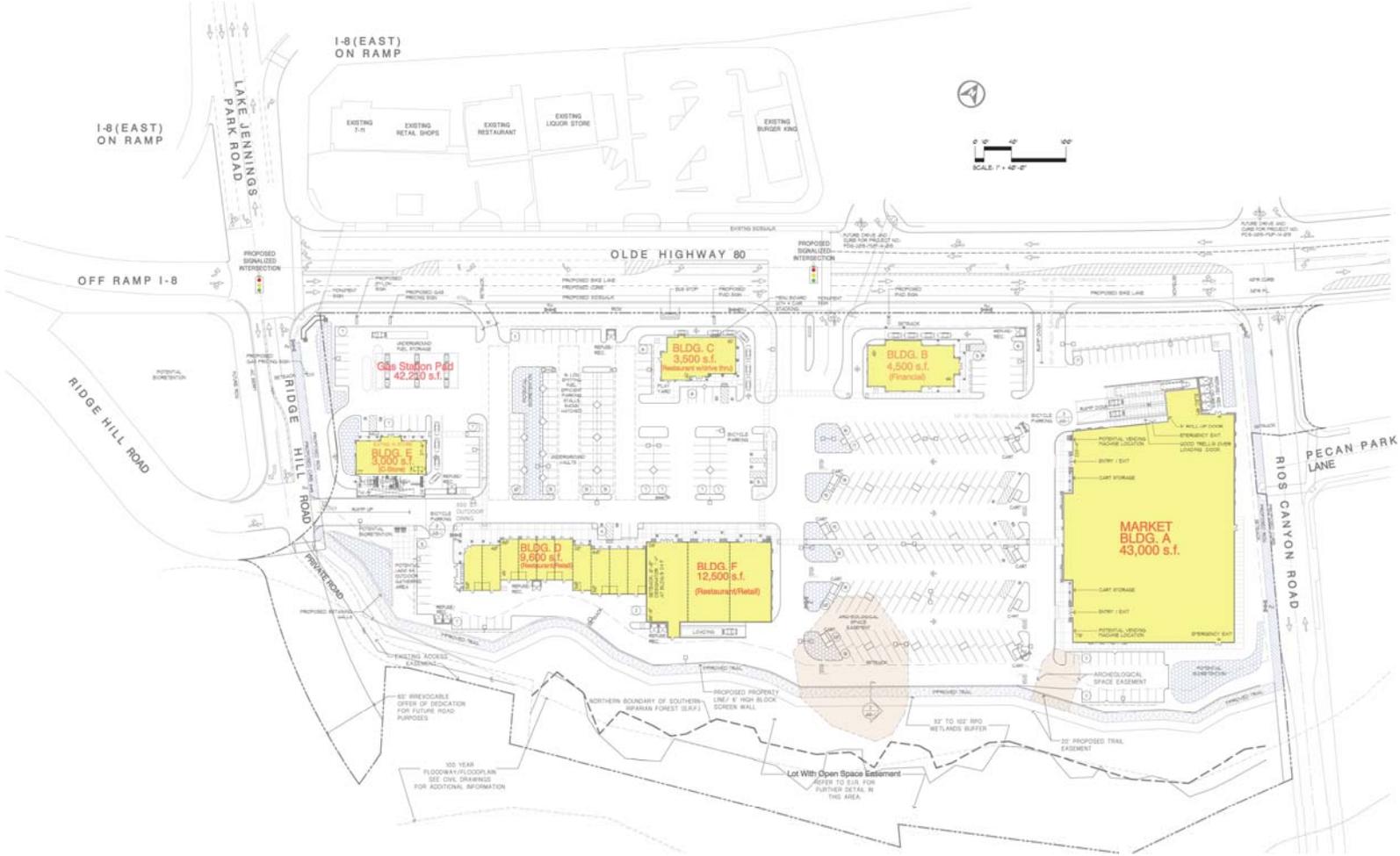


FIGURE 4: Proposed Lake Jennings Market Place Development Map (Smith Consulting Architects 1/15)

## Air Quality Definitions

Air quality is defined by ambient air concentrations of specific pollutants determined by the Environmental Protection Agency (EPA) to be of concern with respect to the health and welfare of the public.<sup>1</sup> The subject pollutants, which are monitored by the EPA, are Carbon Monoxide (CO), Sulfur Dioxide (SO<sub>2</sub>), Nitrogen Dioxide (NO<sub>2</sub>), Ozone (O<sub>3</sub>), respirable 10- and 2.5-micron particulate matter (PM<sub>10</sub>), Volatile Organic Compounds (VOC), Reactive Organic Gasses (ROG), Hydrogen Sulfide (H<sub>2</sub>S), sulfates, lead, and visibility reducing particles. Examples of these EPA monitored pollutant sources and their effects on localized air quality are discussed below:

- **Carbon Monoxide (CO):** Carbon monoxide is a colorless, odorless, tasteless and toxic gas resulting from the incomplete combustion of fossil fuels. CO interferes with the blood's ability to carry oxygen to the body's tissues and results in numerous adverse health effects. CO is a criteria air pollutant.
- **Oxides of Sulfur (SO<sub>x</sub>):** Typically strong smelling, colorless gases that are formed by the combustion of fossil fuels. SO<sub>2</sub> and other sulfur oxides contribute to the problem of acid deposition. SO<sub>2</sub> is a criteria pollutant.
- **Nitrogen Oxides (Oxides of Nitrogen, or NO<sub>x</sub>):** Nitrogen oxides (NO<sub>x</sub>) consist of nitric oxide (NO), nitrogen dioxide (NO<sub>2</sub>), and nitrous oxide (N<sub>2</sub>O); these are formed when nitrogen (N<sub>2</sub>) combines with oxygen (O<sub>2</sub>). Their lifespans in the atmosphere range from one to seven days for nitric oxide and nitrogen dioxide, and 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes, and are major contributors to smog formation and acid deposition. NO<sub>2</sub> is a criteria air pollutant, and may result in numerous adverse health effects. It absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility.
- **Ozone (O<sub>3</sub>):** A strong smelling, pale blue, reactive toxic chemical gas consisting of three oxygen atoms. It is a product of the photochemical process involving the sun's energy. Ozone exists in the upper atmosphere ozone layer, as well as at the earth's surface. Ozone at the earth's surface causes numerous adverse health effects and is a criteria air pollutant. It is a major component of smog.
- **PM<sub>10</sub> (Particulate Matter less than 10 microns):** A major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs, where they may be deposited, resulting in adverse health effects. PM<sub>10</sub> also causes visibility reduction and is a criteria air pollutant.
- **PM<sub>2.5</sub> (Particulate Matter less than 2.5 microns):** A similar air pollutant consisting of tiny solid or liquid particles which are 2.5 microns or smaller (often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO<sub>2</sub> release from power plants and

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<sup>1</sup> Per the Federal Clean Air Act of 1970 (United States Code, Title 42, Chapter 85) and subsequent amendments.

industrial facilities, and nitrates that are formed from NO<sub>x</sub> release from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions.

- **Volatile Organic Compounds (VOC):** Volatile organic compounds are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOC's contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent, when exposed to photochemical processes. VOC's often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include: carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate.
- **Reactive Organic Gasses (ROG):** Similar to VOC, Reactive Organic Gasses (ROG) are also precursors in forming ozone, and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and nitrogen oxides react in the presence of sunlight.
- **Hydrogen Sulfide (H<sub>2</sub>S):** A colorless, flammable, poisonous compound having a characteristic rotten-egg odor. It often results when bacteria break down organic matter in the absence of oxygen. High concentrations of 500-800 ppm can be fatal and lower levels cause eye irritation and other respiratory effects.
- **Sulfates:** An inorganic ion that is generally naturally occurring and is one of several classifications of minerals containing positive sulfur ions bonded to negative oxygen ions.
- **Lead:** A malleable, metallic element of bluish-white appearance that readily oxidizes to a grayish color. Lead is a toxic substance that can cause damage to the nervous system or blood cells. The use of lead in gasoline, paints, and plumbing compounds has been strictly regulated or eliminated, such that today it poses a very small risk.
- **Visibility Reducing Particles (VRP):** VRP's are just what the name implies, namely, small particles that occlude visibility and/or increase glare or haziness. Since sulfate emissions (notably SO<sub>2</sub>) have been found to be a significant contributor to visibility-reducing particles, Congress mandated reductions in annual emissions of SO<sub>2</sub> from fossil fuels starting in 1995.

The EPA has established ambient air quality standards for these pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS).<sup>2</sup> The California Air Resources Board (CARB) subsequently established the more stringent

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<sup>2</sup> Under the Federal Clean Air Act of 1970, U.S.C. Title 42, Chapter 85, as amended in 1977 and 1990.

California Ambient Air Quality Standards (CAAQS).<sup>3</sup> Both sets of standards are shown in Figure 5. Areas in California where ambient air concentrations of pollutants are higher than the state standard are considered to be in “*non-attainment*” status for that pollutant.



## ENVIRONMENTAL SIGNIFICANCE THRESHOLDS

### California Environmental Quality Act (CEQA) Thresholds

Section 15382 of the California Environmental Quality Act (CEQA) guidelines defines a significant impact as,

*“... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”*

The minimum change in ambient air quality conditions within the County of San Diego, as identified by the San Diego Air Pollution Control District (SDAPCD), are outlined starting on Page 10 of this report.

### CEQA Air Quality Screening Standards

The County of San Diego uses Appendix G.III of the State CEQA guidelines as thresholds of significance, and recognizes the SDAPCD’s established screening thresholds for air quality emissions (*Rules 20.1 et. seq.*), as screening standards. These standards focus on the following potential impact areas, namely, would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting a substantial number of people?

These screening standards will be applied throughout this air quality conformity assessment for the basis of determination of both regional, as well as localized, air quality impacts due to the proposed project.

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<sup>3</sup> The new CARB eight-hour ozone standard became effective in early 2006. The new federal PM<sub>2.5</sub> standard became effective in early 2007.

<b>Ambient Air Quality Standards</b>						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone (O <sub>3</sub> )	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )		0.075 ppm (147 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>8</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		—		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>8</sup>	24 Hour	—	—	35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12.0 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m <sup>3</sup> )	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		—	—	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>9</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemiluminescence	100 ppb (188 µg/m <sup>3</sup> )	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>10</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>10</sup>	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) <sup>10</sup>	—	
Lead <sup>11,12</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m <sup>3</sup> (for certain areas) <sup>12</sup>	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>13</sup>	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	<b>No National Standards</b>		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>11</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chromatography			

**FIGURE 5: Ambient Air Quality Standards Matrix (after CARB/EPA, updated 6/4/13)**

## SDAPCD Criteria Pollutant Standards

Pursuant to the California Health & Safety Code, jurisdiction for regulation of air emissions from non-mobile sources within San Diego County has been delegated to the San Diego County Air Pollution Control District (SDAPCD).<sup>4</sup> As part of its air quality permitting process, SDAPCD has established thresholds for the preparation of *Air Quality Impact Assessments* (AQIA's) and/or *Air Quality Conformity Assessments* (AQCA's).

SDAPCD Rule 20.2, which outlines these screening level criteria, states that any project that results in an emission increase equal to or greater than any of these levels, must:

“... demonstrate through an AQIA . . . that the project will not (A) cause a violation of a State or national ambient air quality standard anywhere that does not already exceed such a standard, nor (B) cause additional violations of a national ambient air quality standard anywhere the standard is already being exceeded, nor (C) cause additional violations of a State ambient air quality standard anywhere the standard is already being exceeded, nor (D) prevent or interfere with the attainment or maintenance of any State or national ambient air quality standard.”

The applicable standards are shown in Table 2. For projects whose stationary-source emissions are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant. The County of San Diego accepts the use of these “screening criteria” as “*Thresholds of Significance*” by projects for the purposes of CEQA analysis.

These standards are compatible with those utilized elsewhere in the State (such as South Coast Air Quality Management District standards, etc.) as part of CEQA guidance documents. In the event that project emissions may approach or exceed these screening level criteria, modeling would be required to demonstrate that the project's ground-level concentrations, including appropriate background levels, are below the Federal and State Ambient Air Quality Standards.

The existing ambient conditions are compared for the with- and without-project cases. If emissions exceed the allowable thresholds, additional analysis is conducted to determine whether the emissions would exceed an ambient air quality standard (i.e., the CAAQS values previously shown in Figure 5). Determination of significance considers both localized impacts (such as CO hotspots) and cumulative impacts. In the event that any criteria pollutant exceeds the threshold levels, the proposed action's impact on air quality is considered significant and mitigation measures would be required.

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<sup>4</sup> Source: *California Health & Safety Code, Division 26, Part 3, Chapter 1, Section §40002.*

**TABLE 2: Thresholds of Significance for Air Quality Impacts**

Pollutant	Thresholds of Significance (Pounds per Day)	Clean Air Act <i>less than significant</i> Levels (Tons per Year)
Carbon Monoxide (CO)	<b>550</b>	100
Oxides of Nitrogen (NO <sub>x</sub> )	<b>250</b>	50
Oxides of Sulfur (SO <sub>x</sub> )	<b>250</b>	100
Particulate Matter (PM <sub>10</sub> )	<b>100</b>	100
Particulate Matter (PM <sub>2.5</sub> )	<b>55</b>	100
Volatile Organic Compounds (VOC's)	<b>75</b>	50
Reactive Organic Gasses (ROG's)	<b>75</b>	50

Source: SDAPCD Rule 1501, 20.2(d)(2), 1995; EPA 40 CFR 93, 1993.

Threshold for VOC's based on the threshold of significance for reactive organic gases (ROG's) from Chapter 6 of the CEQA Air Quality Handbook of the South Coast Air Quality Management District. Threshold for ROG's in the eastern portion of the County based on the threshold of significance for reactive organic gases (ROG's) from Chapter 6 of the CEQA Air Quality Handbook of the Southeast Desert Air Basin.

Thresholds are applicable for either construction or operational phases of a project action. The PM<sub>2.5</sub> threshold is based upon the proposed standard identified in the, "Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds", published by SCAQMD in October 2006.

For CEQA purposes, these screening criteria are used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since SDAPCD does not have AQIA thresholds for emissions of volatile organic compounds (VOC's), the use of the screening level for reactive organic compounds (ROC) from the CEQA Air Quality Handbook for the South Coast Air Basin (SCAB), which has stricter standards for emissions of ROC's/VOC's than San Diego's, is appropriate. No differentiation is made between construction and operation emission thresholds.

Finally, under the General Conformity Rule, the EPA has developed a set of *de minimis* thresholds for all proposed federal actions in a non-attainment area for evaluating the significance of air quality impacts. It should be noted that the State (i.e., SDAPCD) standards are equal to, or more stringent than, the Federal Clean Air standards.<sup>5</sup> Development of the proposed project would therefore fall under the stricter SDAPCD guidelines.

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<sup>5</sup> A fact that can be verified through multiplication of the SDAPCD standards by 365 days and dividing by 2,000 pounds.

## Combustion Toxics Risk Factors

When fuel burns in an engine, the resulting exhaust is made up of soot and gases representing hundreds of different chemical substances. The predominant constituents are:

- Nitrous Oxide
- Formaldehyde
- Sulfur Dioxide
- Carbon Dioxide
- Nitrogen Dioxide
- Benzene
- Hydrogen Sulfide
- Carbon Monoxide

Over ninety-percent (90%) of the exhaust emissions from an engine consist of soot particles whose size is equal to, or less than, 10-microns in diameter. Particles of this size can easily be inhaled and deposited in the lungs. Diesel exhaust contains roughly 20 to 100 times more emissive particles than gasoline exhaust. Of principal concern are particles of cancer causing substances known as *polynuclear aromatic hydrocarbons* (PAH's).<sup>6</sup>

There are inherent uncertainties in risk assessment with regard to the identification of compounds as causing cancer or other adverse health effects in humans, the cancer potencies and Reference Exposure Levels (REL's)<sup>7</sup> of compounds, and the exposure that individuals receive. It is common practice to use conservative (health protective) assumptions with respect to uncertain parameters. The uncertainties and conservative assumptions must be considered when evaluating the results of risk assessments.

Since the potential health effects of contaminants are commonly identified based on animal studies, there is uncertainty in the application of these findings to humans. In addition, for many compounds it is uncertain whether the health effects observed at higher exposure levels in the laboratory or in occupational settings will occur at lower environmental exposure levels. In order to ensure that potential health impacts are not underestimated, it is commonly assumed that effects seen in animals, or at high exposure levels, could potentially occur in humans following low-level environmental exposure.

Estimates of potencies and REL's are derived from experimental animal studies, or from epidemiological studies of exposed workers or other populations.<sup>8</sup> Uncertainty arises from the application of potency, or REL values derived from this data, to the

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<sup>6</sup> Polynuclear aromatic hydrocarbons (PAH's) are hydrocarbon compounds with multiple benzene rings. PAH's are a group of approximately 10,000 compounds which result predominately from the incomplete burning of carbon-containing materials like oil, wood, garbage or coal.

<sup>7</sup> The exposure level at which there are no biologically significant increases in the frequency or severity of adverse effects between the exposed population and the control group. Some effects may be produced at this level, but they are not considered adverse or precursors to adverse effects.

<sup>8</sup> Source: CalEPA, USEPA, SCAQMD, 2001 et. seq.

general human population. There is debate as to the appropriate levels of risk assigned to diesel particulates, since the USEPA has not yet declared diesel particulates as a toxic air contaminant.

Using the CARB threshold, a risk concentration level of one in one million (1:1,000,000) of continuous 70-year exposure is considered less than significant. A risk exposure level of ten in one million (10:1,000,000) is acceptable if *Toxic Best Available Control Technologies* (T-BACT's) are used. It should be noted that this type of reporting is only strictly applicable to large populations (such as entire air basins), where the sample group is sizeable, and the exposure time is long (which is not the case for project-level construction projects).

For purposes of analysis under this report, and to be consistent with the approaches used for other toxic pollutants, a functional comparison of the aforementioned risk probability per individual person exposed to construction contaminants will be examined. This approach has the advantage of not needing to quantify the population of the statistical group adjacent to the construction (which could yield false values), as well as allowing the per-person risk to be expressed as a final percentage (with a percentage level of 100% being equal to the impact threshold). Of course, for a large enough population sample (i.e., a million people or more) the results are identical to CARB's prediction methodology.



## **APPROACH AND METHODOLOGY**

The analysis criteria for air quality impacts are based upon the approach recommended by the *South Coast Air Quality Management District's (SCAQMD) CEQA Handbook*.<sup>9</sup> The handbook establishes aggregate emission calculations for determining the potential significance of a proposed action. In the event that the emissions exceed the established thresholds, air dispersion modeling may be conducted to assess whether the proposed action results in an exceedance of an air quality standard. The County of San Diego has adopted this methodology.

### **Ambient Air Quality Data Collection**

#### CARB Air Monitoring Station Data within Project Vicinity

The California Air Resources Board (CARB) monitors ambient air quality at approximately 250 stations across the state. Pollutant concentrations are typically measured at 10 feet above ground level; therefore, air quality is often referred to in terms

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<sup>9</sup> The SCAQMD CEQA Handbook is a reference volume containing an extensive list of semi-empirical (quantified experimental) curve-fit equations describing various emissive sources having important context under CEQA. The equations are not perfect (in that they would not constitute an 'exact solution' in a scientific sense), but are nonetheless a reasonable approximation of the physical problem. In the same light, programs which utilize the SCAQMD semi-empirical methodology (such as *URBEMIS 2007* and the like) provide no greater problem understanding than using the equations directly. Such programs are still subject to all of the same limitations as the methods and equations on which they rely.

of ground-level concentrations. Ambient air pollutant concentrations are measured at 10 air-quality-monitoring stations operated by the SDAPCD.

The ambient air-quality-monitoring station (denoted by the symbol  in Figure 6), which is in relatively close proximity to the project site, and would be representative of ambient air toxics under both onshore and offshore atmospheric wind conditions, is located within the City of El Cajon, approximately 5.2 miles from the project site.<sup>10</sup> Other stations within the project vicinity present either incomplete or redundant data, or were determined not to be representative of localized ambient air quality conditions present at the project site.

Finally, due to the type of equipment employed at each station, not every station is capable of recording the entire set of criteria pollutants previously identified in Table 2. Periodic audits are conducted to ensure calibration conformance.<sup>11</sup>

#### Onsite Air Quality Monitoring and Analysis

Additionally, an ambient air quality sample was collected at an elevated location with respect to the project development area at a height of 5.0-feet above ground level using a negative pressure sampling apparatus. The sampling location is shown in Figure 7. Each air sample was collected in a 0.7-liter Teflon (Tedlar) sample bag, and sealed upon completion of the testing.

Onsite testing conditions indicated an ambient dry-bulb air temperature of 82.0 degrees Fahrenheit and a relative humidity of 64.2 percent. Wind speeds were light from the southwest, and the average barometric pressure was 29.96 in-Hg. The sample was maintained under *Standard Temperature and Pressure Conditions* (STP) during transit to the ISE test facility.

The bagged samples were tested for airborne toxics, as well as molecular composition using a Stanford Research Systems 300 atomic-mass-unit (AMU) Universal Gas Analyzer (or UGA).<sup>12</sup> This device, which consists of a Faraday cup quadrupole mass spectrometer, analyzes incoming gasses (or any material that can be aerosolized) for content based upon its atomic distribution. In this manner, the UGA analyzes any substance based solely upon its elemental composition.

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<sup>10</sup> El Cajon – Redwood Avenue Station (1155 Redwood Ave, El Cajon CA 92019) – ARB Station ID 80131.

<sup>11</sup> Calibration of CARB equipment is performed in accordance with the U.S. *Environmental Protection Agency's 40 CFR, Part 58, Appendix A* protocol with all equipment traceable to National Institute of Standards and Technology (NIST) standards. The typical accuracy of the equipment is ±15% for gasses (such as CO, NO<sub>x</sub><sup>Error! Bookmark not defined.</sup>, etc.) and ±10% for PM<sub>10</sub><sup>Error! Bookmark not defined.</sup>.

<sup>12</sup> The designator AMU stands for Atomic Mass Unit, and is a measure of the atomic weight of a particular element (i.e., the combined nuclear weight of an element's protons and neutrons).

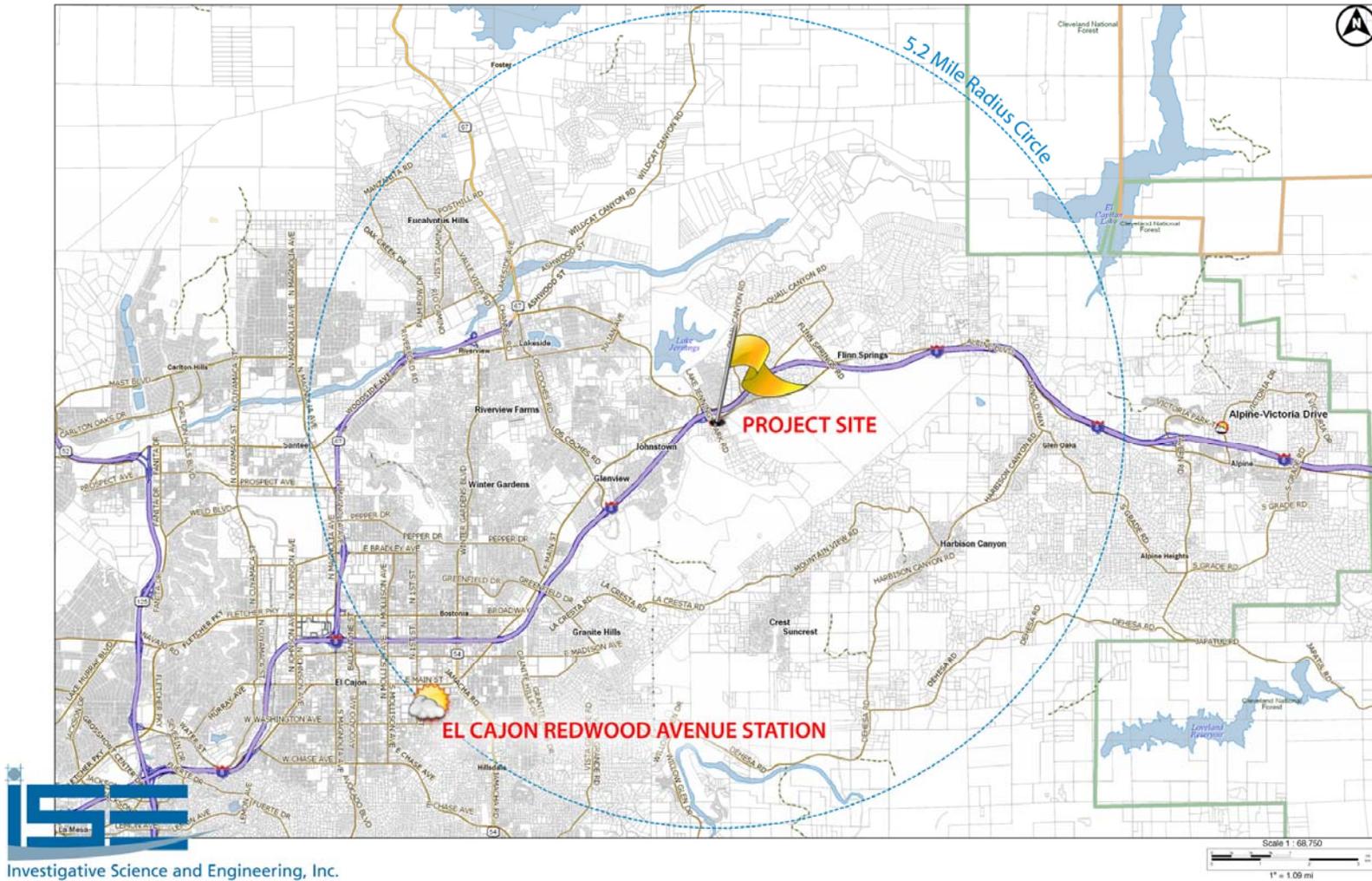


FIGURE 6: Ambient Air Quality Monitoring Station Location Map (ISE 7/14)



FIGURE 7: Ambient Air Quality Sampling Location (ISE 7/14)

The typical test setup is shown in Figure 8. Data from the UGA was then post processed using a process known as *spectral deconvolution* to determine the relative composition of any toxics of interest. A final screening of the data against 191,436 different compounds was performed using the 2008 National Institute of Standards and Technology (NIST11) Mass Spectral Library search program.<sup>13</sup>



FIGURE 8: Laboratory Mass Spectrometry Test Setup (ISE 7/14)

## Construction Air Quality Modeling

### Construction Vehicle Emission Modeling (CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, ROG)

Primary construction vehicle pollutant emission generators expected within the Lake Jennings Market Place site would consist predominately of diesel-powered grading and earthwork equipment required for grading activities, underground work, and surface paving. The analysis methodology utilized in this report is based upon the EPA AP-42 tiered emissions report for the various classes of diesel construction equipment.<sup>14,15</sup>

The maximum generation rates of typical EPA Tier 1 equipment would constitute the baseline analysis condition for construction emission rates as mandated by the EPA. Estimates of daily load factors (i.e., the amount of time during a day that any piece of

<sup>13</sup> Source: NIST/EPA/NIH Mass Spectral Database (NIST 11) and NIST Mass Spectral Search Program (Version 2.0g), National Institute of Standards and Technology, U.S. Department of Commerce, 5/11.

<sup>14</sup> The EPA allowable maximum CO emissions from Tier 2 equipment is 0.0082 pounds per horsepower-hour (lb/HP-hr) for equipment with power ratings between 50 and 175 HP, and 0.0057 lb/HP-hr for equipment with power ratings over 175 HP. Tier 3 ratings only apply between 50 to 750 HP and are identical to Tier 2 requirements. Tier 4 requirements (to be phased-in between 2008 and 2015) set a sliding scale on CO limits ranging from 0.0132 lb/HP-hr for small engines, to 0.0057 lb/HP-hr for engines up to 750 HP.

<sup>15</sup> The EPA allowable maximum NO<sub>x</sub> and PM<sub>10</sub> emissions from Tier 2 equipment are 0.0152 and 0.0003 lb/HP-hr regardless of the engine size. Tier 3 emissions must meet the Tier 2 requirement. Tier 4 standards further reduce this level to 0.0006 lb/HP-hr for NO<sub>x</sub>, and 0.0003 lb/HP-hr for PM<sub>10</sub> for engines over 75 HP.

equipment is operating) were based upon past ISE engineering experience with similar operations, and consultation with the project applicant. In cases where the required construction equipment aggregate does not comply with the applicable standards for a pollutant under examination (i.e., Tier level), mitigation is imposed by requiring cleaner (i.e., higher tiered) equipment, as required under the Federal Clean Air Act, until compliance is achieved.<sup>16,17</sup>

Finally, fine particulate dust generation ( $PM_{2.5}$ ) from construction equipment was analyzed using the methodology identified by the SCAQMD.<sup>18</sup> This approach, which utilizes the *California Emission Inventory Development and Reporting System* (CEIDARS) database, estimates  $PM_{2.5}$  emissions as a fractional percentage of the aggregate  $PM_{10}$  emissions. For diesel construction equipment, the fractional emission factor is  $0.920 PM_{2.5} / PM_{10}$ .

#### Fugitive Dust Emission Modeling ( $PM_{10}$ , $PM_{2.5}$ )

Fugitive dust generation from the proposed remedial grading plan was analyzed using the methodology recommended in the SCAQMD CEQA Handbook guidelines for calculating 10-micron Particulate Matter ( $PM_{10}$ ) due to earthwork movement and stockpiling. The analysis assumed low-wind speeds and active wet suppression control.

Aggregate levels of  $PM_{10}$ , based upon the best available surface grading estimates, were calculated in pounds per day and compared to the applicable significance criteria previously shown in Table 2. For surface grading operations, the fractional emission factor is  $0.208 PM_{2.5} / PM_{10}$  based upon the SCAQMD approach. For unpaved road travel, the fractional emission factor is  $0.212 PM_{2.5} / PM_{10}$ .

#### Blast Generated Emission Modeling ( $CO$ , $NO_x$ , $SO_2$ , $N_2$ , $CO_2$ , and $H_2O$ )

An analysis of extremely rapid combustion products produced by the initiation of a mixture of ammonium nitrate ( $NH_4NO_3$ ) and fuel oil (or ANFO) was performed using the EPA's AP-42 document<sup>19</sup>, using a defined criteria pollutant generation rate for ANFO. The findings are tabulated within this report.

#### Combustion-Fired Health-Risk Emission Modeling ( $PM_{10}$ , $PM_{2.5}$ )

For the purposes of this analysis, worst-case construction vehicle pollutant emission generators would consist entirely of construction activities associated with

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<sup>16</sup> Source: *US Code of Federal Regulations, Title 40, Part 89 [40 CFR Part 89]*.

<sup>17</sup> In most cases the federal regulations for diesel construction equipment also apply in California, whose authority to set emission standards for new diesel engines is limited. The federal Clean Air Act Amendments of 1990 (CAA) preempt California's authority to control emissions from both new farm and construction equipment under 175 hp [CAA Section 209(e)(1)(A)] and require California to receive authorization from the federal EPA for controls over other off-road sources [CAA Section 209 (e)(2)(A)].

<sup>18</sup> The  $PM_{2.5}$  emission factors are based upon the SCAQMD document, "Final – Methodology to Calculate Particulate Matter (PM) 2.5 and  $PM_{2.5}$  Significance Thresholds", 10/06. The correction factor for diesel equipment of this type is 0.920.

<sup>19</sup> Table 13.3-1 of the EPA's AP-42 document.

grading and site preparation of each residential pad, as well as construction of the connecting roadways. The analysis methodology utilized in this report is based upon EPA and CARB guidelines for construction operations. Construction emissions were based upon Tier 2 and 3 generation rates for the various classes of diesel construction equipment per the screening analysis identified above.

A screening risk assessment of diesel-fired toxics from construction equipment was performed using the *SCREEN3* dispersion model developed by the EPA's Office of Air Quality Planning and Standards.<sup>20</sup> The *SCREEN3* model uses a Gaussian plume dispersion algorithm that incorporates source-related and meteorological factors to estimate pollutant concentration from continuous sources.

Modeling under *SCREEN3* assumes that the pollutant in question does not undergo any chemical reactions, and that no other removal processes, such as wet or dry deposition, act on the plume during its transport from the source. Using the concentrations obtained from the screening model, the diesel toxic risk can be defined as shown below:

$$Risk = \frac{F_{wind} \cdot EMFAC \cdot URF_{70}}{Dilution}$$

Where, *Risk* is the excess cancer risk (probability in one-million),  $F_{wind}$  is the frequency of the wind blowing from the exhaust source to the receptor (the default value is 1.0), *EMFAC* is the exhaust particulate emission factor (the level from the screening model),  $URF_{70}$  is the Air Resource Board unit risk probability factor ( $300 \times 10^{-6}$ , or 300 in a million cancer risk per  $\mu\text{g}/\text{m}^3$  of diesel combustion generated  $\text{PM}_{10}$  inhaled in a 70-year lifetime,<sup>21</sup> and, *Dilution* is the atmospheric dilution ratio during source-to-receptor transport (the default value of 1.0 assumes no dilution).

Given the above assumptions for wind frequency and atmospheric dilution ratio, and substituting the CARB recommended value for the unit risk probability factor, gives the following expression:

$$Risk = \frac{1.0 \cdot EMFAC \cdot 300 \times 10^{-6}}{1.0} = 300 \times 10^{-6} \cdot EMFAC \text{ per person}$$

Thus, the percentage of risk of cancer to any given person, being exposed to a concentration of pollution equal to *EMFAC* (in  $\mu\text{g}/\text{m}^3$ ) over a continuous period of 70-years, would be:

$$Risk_{\%} = (300 \times 10^{-6} \cdot EMFAC) \cdot 100 = 300 \times 10^{-4} \cdot EMFAC \text{ per person}$$

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<sup>20</sup> The methodology is based upon the *Industrial Source Complex (ISC3)* source dispersion approach as outlined in the *EPA-454/B-95-003b* technical document. The *SCREEN3* model is used within the State of California and is typically more restrictive than the *ISC3* model.

<sup>21</sup> Based upon ARB 1999 Staff Report from the Scientific Review Panel (SRP) on Diesel Toxics inhaled in a 70-year lifetime.

Where it can be directly stated that a risk percentage of, say, 25% would indicate a 25% probability of inhaled cancer risk for the given level of exposure if consumed continuously for a period of 70-years. A 50% probability would correspond to a 50:50 chance of inhaled cancer risk if consumed continuously for a period of 70-years, and so on.

For the construction-related diesel-fired toxics analysis, an area-source consistent in dimensions with the proposed grading area will be assumed. A simplified elevated terrain model (which is consistent with the area surrounding the project site) with no building downwash corrections and a worst-case wind direction was utilized.

#### VOC Emissions from Architectural Coatings Methodology

Volatile Organic Compound (VOC) emissions from architectural coatings such as painting will be analyzed within this report using the *SCAQMD CEQA Handbook Method A11-13* based upon an expected maximum total square-footage being painted per day. It will be assumed for the purposes of this assessment that all solvents used are water based with a maximum 50-percent by weight solids content, and are capable of generating the maximum CARB level of 250 grams of VOC per liter, regardless of the application method.

#### **Aggregate Vehicle Emission Air Quality Modeling**

Motor vehicle emissions associated with proposed Lake Jennings Market Place subdivision project were calculated by multiplying the appropriate emission factor (in grams per mile) times the estimated trip length and the total number of vehicles. Appropriate conversion factors were then applied to provide aggregate emission units of pounds per day.

CARB estimates on-road motor vehicle emissions by using a series of models called the *Motor Vehicle Emission Inventory (MVEI) Models*. Four computer models, which form the MVEI, are *CALIMFAC*, *WEIGHT*, *EMFAC*, and *BURDEN*.<sup>22</sup>

For the current analysis, the *EMFAC 2011* of the MVEI<sup>23</sup> was run using input conditions specific to the San Diego air basin to predict operational vehicle emissions from the project, based upon a project completion year 2020 scenario.<sup>24</sup> The aggregate emission factors from the EMFAC model are provided as an attachment at the end of

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<sup>22</sup> *CALIMFAC* produces base emission rates for each model year when a vehicle is new and as it accumulates mileage and the emission controls deteriorate. *WEIGHT* calculates the relative weighting each model year should be given in the total inventory, and each model year's accumulated mileage. *EMFAC* uses these pieces of information, along with the correction factors and other data, to produce fleet composite emission factors, and, *BURDEN* combines the emission factors with county-specific activity data to produce the emission inventories.

<sup>23</sup> This is the most current CARB emissions model approved for use within the State of California.

<sup>24</sup> This is a worst-case assumption, since implementation of cleaner vehicle controls ultimately reduces emissions under future year conditions. By applying near-term emission factors to the complete project, an upper bound on project-related emissions is obtained.

this report. A mix ratio consistent with the 2010 Caltrans ITS Transportation Project-Level Carbon Monoxide Protocol was used.<sup>25</sup>

Fine particulate dust generation ( $PM_{2.5}$ ) from motor vehicle operation was analyzed using the aforementioned CEIDARS database. For operational vehicular traffic, the fractional emission factor is  $0.998 PM_{2.5} / PM_{10}$  based upon both the SCAQMD and EMFAC approaches.

### Traffic Segment Pollutant Concentration Modeling

A hotspot conformity analysis was performed on all project-related roadway segments, using the *California Line Source Emissions Model Version 4* (CALINE4)<sup>26</sup> air dispersion model methodology in order to quantify near term cumulative plus project pollutant concentrations within this portion of the project air basin. CALINE4 is the accepted line source dispersion model within the State of California.

For the hotspot analysis, horizon traffic volumes for all affected roadway segments were used based upon near-term cumulative values provided by the project traffic engineer.<sup>27</sup> Worst case mean running speeds of 45 MPH and a 10% ADT level were used for all potentially impacted roadway segments. Additionally, worst-case wind speed, aggregate emissions class data, and meteorological assumptions were created and run for various traffic scenarios.

Ambient CO and  $PM_{10}$  concentrations were determined through the previously discussed field monitoring effort. Levels for  $NO_x$  precursors were set to basin-wide levels. The  $NO_2$  photolysis rate was taken at a default atmospheric solar value of 0.004/sec.<sup>28</sup> The CALINE4 solution space is provided as an attachment to this report.

### Fixed Source Emissions Modeling

Fixed emission sources under the analysis context within this report would consist predominantly of small gasoline engines used with landscaping equipment, and emissive sources from natural gas powered appliances such as stoves, hot water heaters, etc. An analysis of these emission sources, consistent with the *SCAQMD CEQA Handbook* and current EPA protocols, will be quantified with the total aggregate emission levels identified at the end of this report.<sup>29</sup>

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<sup>25</sup> This consisted of the following air standard Otto-Cycle engine vehicle distribution percentages: Light Duty Auto (LDA) = 69.0%, Light Duty Truck (LDT1) = 19.4%, Medium Duty Truck (LHD1) = 6.4%, Heavy Duty Truck Gasoline (MH GAS) = 1.2%, Heavy Duty Truck Diesel (MH DSL) = 3.6%, Motorcycle (MCY) = 0.4%.

<sup>26</sup> CALINE4 is a Gaussian line dispersion model, developed by Caltrans, which is used to predict localized vehicle emissions from mobile sources. The model uses source strength, meteorological data, and site geometry to predict pollutant concentrations within 1,500 feet of the roadway.

<sup>27</sup> Source: Lake Jennings Market Place Traffic Impact Study, KOA Corporation, 4/15.

<sup>28</sup> Photolysis is the process by which a chemical compound undergoes a change in valence as the result of the absorption of a photon (i.e., light). This process is also called photodecomposition, photochemical reaction, or photo-oxidation.

<sup>29</sup> The analysis presented herein uses the same methodology identified in the CARB *URBEMIS* model, although providing a greater level of detail. The technical details are provided in the SCAQMD CEQA Handbook Tables A9-12 and A9-12A, -B as well as the EPA's AP-42 emission generation document previously referenced.



## CONFORMITY FINDINGS

### Existing Climate Conditions

The climate within the region surrounding the proposed Lake Jennings Market Place development site is characterized by warm, dry summers and mild, wet winters; it is dominated by a semi-permanent high-pressure cell located over the Pacific Ocean. This high-pressure cell maintains clear skies over the air basin for much of the year. It also drives the dominant onshore circulation, as can be seen in Figure 9, and helps to create two types of temperature inversions, subsidence and radiation, that contribute to local air quality degradation.<sup>30</sup>

In the area of the proposed project site, the maximum and minimum average temperatures are 84° F and 44° F, respectively.<sup>31</sup> Precipitation averages 13 inches annually, 90 percent of which falls between November and April. Fog can occasionally develop during the winter. The prevailing wind direction at the project site is from the west-southwest, with an annual mean speed of 3 to 5 miles per hour. Frequently, the strongest winds in the basin occur during the night and morning hours due to the absence of onshore sea breezes. The overall result is a noticeable degradation in local air quality.<sup>32</sup>

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<sup>30</sup> Subsidence inversions occur during the warmer months, as descending air associated with the Pacific high-pressure cell meets cool marine air. The boundary between the two layers creates a temperature inversion that traps pollutants below it. Similarly, radiation inversion typically develops on winter nights, when air near the ground cools and the air aloft remains warm. This creates a shallow inversion layer that can trap pollutants between the two layers.

<sup>31</sup> Source: *National Weather Service (NWS) / National Oceanographic and Atmospheric Administration (NOAA), 2014.*

<sup>32</sup> Occasionally during the months of October through February, offshore flow becomes a dominant factor in the regional air quality. These periods, known as "Santa Ana Conditions", are typically maximal during the month of December with wind speeds from the north to east approaching 35 knots and gusting to over 50 knots. This air movement is caused by clockwise pressure circulation over the Great Basin (i.e., the high plateau east of the Sierra Mountains and west of the Rocky Mountains including most of Nevada and Utah), which results in significant downward air motion towards the ocean. Stronger Santa Ana winds can have gusts greater than 60 knots over widespread areas and gusts greater than 100 knots in canyon areas.



FIGURE 9: Project Air Basin Aerial Map (Google Earth 2014, ISE 7/14)

## Existing Air Quality Levels

### CARB Aerometric Station Data within Project Vicinity

The project site is located in the western central portion of the San Diego Air Basin. The Basin continues to have a transitional-attainment status of federal standards for Ozone (O<sub>3</sub>) and PM<sub>10</sub>. The Basin is either in attainment or unclassified for federal standards of CO, SO<sub>2</sub>, and NO<sub>2</sub>.

Factors affecting ground level pollutant concentrations include the rate at which pollutants are emitted to the atmosphere, the height from which they are released, and topographic and meteorological features.

Tables 3a through -c, starting on the following page, provide a summary of the highest pollutant levels recorded at the previously identified monitoring station for the last year available (2013), based upon the latest data from the CARB Aerometric Data Analysis and Management (ADAM) System database.<sup>33</sup>

Upon examination it can be seen that closest monitoring station reported slight air quality exceedances for the subject criteria pollutants O<sub>3</sub> and PM<sub>2.5</sub>.<sup>34</sup>

### Onsite Air Pollutant Concentration Findings

The atomic mass distribution of the onsite ambient air-monitoring sample is shown in Figure 10.<sup>35</sup> Spectral deconvolution indicated ambient air pollution concentrations, by mass percentage, as shown in Table 4.

Given these findings, no significant ambient air quality impacts are indicated. No respirable 10- and 2.5-micron particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) was indicated in the sample. Toxicity screening against the NIST spectral database indicated no unusual compounds present.

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<sup>33</sup> Averages for O<sub>3</sub> and CO are expressed in parts-per-million, NO<sub>x</sub> is expressed in parts-per-billion, and particulate matter is shown in µg/m<sup>3</sup>. CAAQS exceedances are denoted in yellow, while NAAQS exceedances are shown in orange.

<sup>34</sup> Monitoring for lead was discontinued entirely in 1998.

<sup>35</sup> The plot in this figure indicates the partial atmospheric pressure (in Torr) as a function of the atomic mass unit. The larger the vertical bar, the greater the concentration of a particular atom (or diatomic form). The unit of Torr is a very small pressure unit - one atmosphere equals 760 Torr.

**TABLE 3a: CARB Aerometric Data Analysis – El Cajon Monitoring Station (Panel 1)**

<b>Top 4 Summary: Highest 4 Daily Maximum 8-Hour Ozone Averages</b>						
at El Cajon-Redwood Avenue <span style="float: right;">iADAM</span>						
	2011		2012		2013	
	Date	8-Hr Average	Date	8-Hr Average	Date	8-Hr Average
National:						
First High:	Apr 16	0.066	Oct 1	0.074	May 13	0.076
Second High:	Apr 15	0.070	Apr 8	0.069	Sep 15	0.073
Third High:	Apr 27	0.070	May 22	0.068	May 12	0.072
Fourth High:	Oct 13	0.070	Jun 17	0.068	Apr 20	0.068
California:						
First High:	Apr 16	0.067	Oct 1	0.074	May 13	0.076
Second High:	Apr 15	0.070	Apr 8	0.070	Sep 15	0.074
Third High:	Apr 27	0.070	May 22	0.068	May 12	0.073
Fourth High:	Oct 13	0.070	Jun 17	0.068	Apr 20	0.069
National:						
# Days Above the Standard:	1		0		1	
Nat1 Standard Design Value:	0.071		0.070		0.068	
National Year Coverage:	92		92		91	
California:						
# Days Above the Standard:	1		1		3	
California Designation Value:	0.078		0.078		0.074	
Expected Peak Day Concentration:	0.079		0.078		0.077	
California Year Coverage:	90		91		90	

**Highest Four Daily Maximum 8-Hour Ozone Averages (in parts per million)**

<b>Top 4 Summary: Highest 4 Daily Maximum Hourly Ozone Measurements</b>						
at El Cajon-Redwood Avenue <span style="float: right;">iADAM</span>						
	2011		2012		2013	
	Date	Measurement	Date	Measurement	Date	Measurement
First High:	Apr 16	0.105	Sep 22	0.086	Sep 15	0.090
Second High:	Oct 13	0.084	May 22	0.083	May 13	0.086
Third High:	Apr 15	0.079	Oct 1	0.083	Oct 19	0.081
Fourth High:	Aug 27	0.079	Aug 7	0.079	Sep 29	0.079
California:						
# Days Above the Standard:	1		0		0	
California Designation Value:	0.09		0.09		0.09	
Expected Peak Day Concentration:	0.093		0.088		0.085	
National:						
# Days Above the Standard:	0		0		0	
Nat1 Standard Design Value:	0.095		0.090		0.086	
Year Coverage:	91		93		91	

**Highest Four Daily Maximum Hourly Ozone Measurements (in parts per million)**

**TABLE 3b: CARB Aerometric Data Analysis – El Cajon Monitoring Station (Panel 2)**

<b>Top 4 Summary: Highest 4 Daily 24-Hour PM2.5 Averages</b>						
at El Cajon-Redwood Avenue <span style="float: right;">iADAM</span>						
	2011		2012		2013	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
<b>National:</b>						
First High:	Nov 17	29.7	Jan 1	37.7	Jan 1	23.1
Second High:	Dec 11	23.5	Jan 7	24.8	Jan 13	22.9
Third High:	Oct 30	21.7	Dec 8	22.4	Dec 31	21.5
Fourth High:	May 6	19.5	Apr 21	19.2	Dec 25	19.4
<b>California:</b>						
First High:	Nov 17	29.7	Jan 1	37.7	Jan 1	23.1
Second High:	Dec 11	23.5	Jan 7	24.8	Jan 13	22.9
Third High:	Oct 30	21.7	Dec 8	22.4	Dec 31	21.5
Fourth High:	May 6	19.5	Apr 21	19.2	Dec 25	19.4
<b>National:</b>						
Estimated # Days > 24-Hour Std:	0.0		3.3		0.0	
Measured # Days > 24-Hour Std:	0		1		0	
24-Hour Standard Design Value:	22		22		22	
24-Hour Standard 98th Percentile:	21.7		22.4		21.5	
Annual Standard Design Value:	11.2		10.6		10.6	
Annual Average:	10.5		10.5		10.6	
<b>California:</b>						
Annual Std Designation Value:	12		11		11	
Annual Average:	10.6		*		10.6	
Year Coverage:	98		89		100	

**Highest Four Daily 24-Hour PM2.5 Averages (in micrograms per cubic meter)**

<b>Top 4 Summary: Highest 4 Daily 24-Hour PM10 Averages</b>						
at El Cajon-Redwood Avenue <span style="float: right;">iADAM</span>						
	2011		2012		2013	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
<b>National:</b>						
First High:	Apr 15	37.0	Jan 1	48.0	May 4	41.0
Second High:	Feb 5	35.0	Jan 7	47.0	May 22	40.0
Third High:	Mar 20	31.0	Jun 8	45.0	May 31	40.0
Fourth High:	Jan 24	29.0	Jun 11	41.0	Jun 21	40.0
<b>California:</b>						
First High:	Dec 2	41.9	Jan 1	47.2	May 4	41.1
Second High:	Nov 17	41.3	Jan 7	45.8	May 31	41.1
Third High:	May 6	40.9	Jun 8	45.6	Jun 21	40.8
Fourth High:	Feb 8	37.5	Sep 21	42.6	May 22	40.6
<b>National:</b>						
Estimated # Days > 24-Hour Std:	*		0.0		0.0	
Measured # Days > 24-Hour Std:	0		0		0	
3-Yr Avg Est # Days > 24-Hr Std:	*		*		0.0	
Annual Average:	19.2		23.4		24.1	
3-Year Average:	22		*		24	
<b>California:</b>						
Estimated # Days > 24-Hour Std:	0.0		0.0		0.0	
Measured # Days > 24-Hour Std:	0		0		0	
Annual Average:	23.7		23.4		24.4	
3-Year Maximum Annual Average:	25		24		24	
Year Coverage:	54		100		100	

**Highest Four Daily 24-Hour PM10 Averages (in micrograms per cubic meter)**

Source: CARB ADAM Ambient Air Quality Inventory – 11/14

**TABLE 3c: CARB Aerometric Data Analysis – El Cajon Monitoring Station (Panel 3)**

<b>Top 4 Summary: Highest 4 Daily Maximum Hourly Nitrogen Dioxide Measurements</b>						
at El Cajon-Redwood Avenue <span style="float: right;">iADAM</span>						
	2011		2012		2013	
	Date	Measurement	Date	Measurement	Date	Measurement
National:						
First High:	Jan 17	49.0	Nov 15	59.0	Dec 17	51.0
Second High:	Oct 12	48.0	Oct 17	49.0	Jan 23	50.0
Third High:	Oct 31	47.0	Oct 1	48.0	Jan 18	47.0
Fourth High:	May 4	46.0	Jan 6	47.0	Jan 22	47.0
California:						
First High:	Jan 17	49	Nov 15	59	Dec 17	51
Second High:	Oct 12	48	Oct 17	49	Jan 23	50
Third High:	Oct 31	47	Oct 1	48	Jan 18	47
Fourth High:	May 4	46	Jan 6	47	Jan 22	47
National:						
1-Hour Standard Design Value:		46		45		45
1-Hour Standard 98th Percentile:		44.0		45.0		45.0
# Days Above the Standard:		0		0		0
Annual Standard Design Value:		12		12		12
California:						
1-Hour Std Designation Value:		50		50		50
Expected Peak Day Concentration:		54		54		51
# Days Above the Standard:		0		0		0
Annual Std Designation Value:		14		13		12
Annual Average:		12		12		12
Year Coverage:		94		95		92

**Highest Four Daily Maximum Hourly Nitrogen Dioxide Measurements  
 (in parts per billion)**

<b>Top 4 Summary: Highest 4 Daily Maximum State 24-Hour Sulfur Dioxide Averages</b>						
at El Cajon-Redwood Avenue <span style="float: right;">iADAM</span>						
	2011		2012		2013	
	Date	24-Hr Average	Date	24-Hr Average	Date	24-Hr Average
First High:	Apr 16	0.001	Oct 2	0.001	Mar 1	0.001
Second High:	May 4	0.000	Jul 20	0.001	Feb 1	0.001
Third High:	Jan 22	0.000	Jan 15	0.001	Jan 23	0.000
Fourth High:	Jan 19	0.000	Jan 11	0.001	Jan 9	0.000
Annual Average:		0.000		*		*
Year Coverage:		90		49		*

**Highest Four Daily Maximum Sulfur Dioxide Measurements (in parts per million)**

Source: CARB ADAM Ambient Air Quality Inventory – 11/14

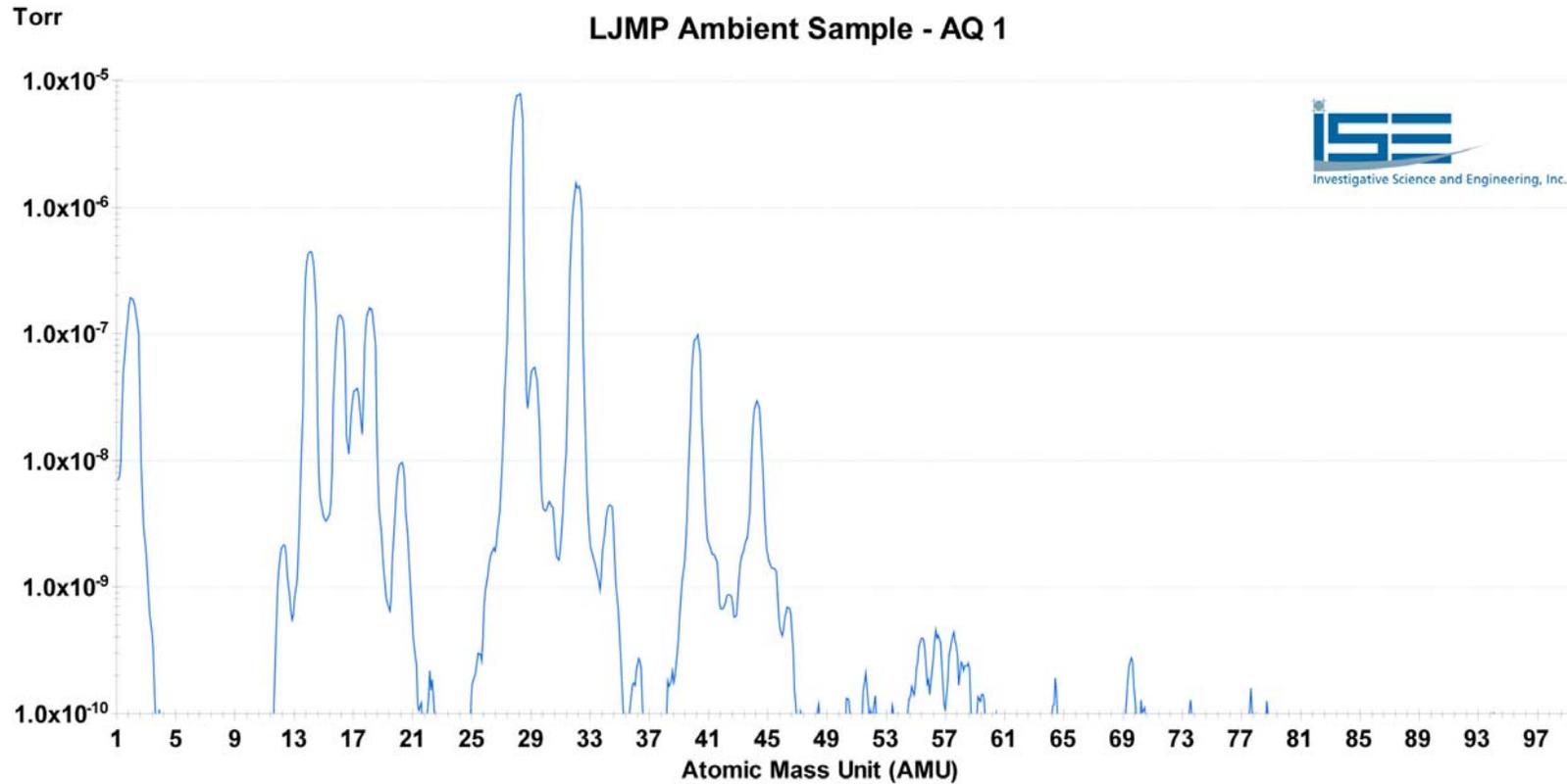


FIGURE 10: Spectral Content of Ambient Air Sample AQ 1 (ISE 7/14)

**TABLE 4: Ambient Air Quality Monitoring Results**

Chemical Compound Examined	Air Sample Composition (% by wt.)	
	Lab Standard Air Sample (Dry N <sub>2</sub> Mix)	Measured Field Sample (AQ 1)
Ammonia (NH <sub>3</sub> )	0.0	0.0
Benzene (C <sub>6</sub> H <sub>6</sub> )	0.0	0.0
Carbon Dioxide (CO <sub>2</sub> )	0.1	0.3
Carbon Monoxide (CO)	0.0	0.0
Hydrogen Sulfide (H <sub>2</sub> S)	0.0	0.0
Nitric Oxide (NO)	0.0	0.0
Nitrogen Dioxide (NO <sub>2</sub> )	0.0	0.0
Nitrous Oxide (N <sub>2</sub> O)	0.0	0.0
Free Nitrogen (N <sub>2</sub> )	97.8	82.6
Free Oxygen (O <sub>2</sub> )	1.3	15.4
Sulfur Dioxide (SO <sub>2</sub> )	0.0	0.0
Water Vapor (H <sub>2</sub> O)	0.8	1.7

*Partial Pressure Mass Fractions by Percent. Data Margin ± 0.1 percent.*

### Project Construction Emission Findings

The proposed Lake Jennings Market Place project site would be cleared and graded over the course of approximately eight months (240 days) as shown in Table 5. Given this, the following construction findings were indicated.

#### Construction Vehicle Emissions (CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, ROG)

The estimated worst-case diesel exhaust emissions due to equipment required for grading activities, underground work, and surface paving, inclusive of any powered haulage, are provided in Table 6 of this report.

Based upon the findings, no significant construction vehicle air quality impacts are expected.

**TABLE 5: Anticipated Construction Grading Phasing Plan**

Phase	Operation	Duration (Months)	Activities Completed
1	Clearing and Grubbing of Site	0.5	Removal of all site debris. Demolition of existing structures and infrastructure. Removal of all vegetation.
2	Alluvial Excavation	3.0	Excavate center section of project site to a depth of 18-feet to remove unconsolidated alluvial materials. Stockpile materials in southern portion of project site. Cover sensitive paleontological area with GeoGrid material, and backfill to approximately three feet.
3	Drill, Blast, and Excavate Existing Rock	1.0	Drill and blast at eastern rock removal locations. Mechanical excavation of rock material at western locations.
4	Backfill Alluvial Excavation Areas with Rock	1.0	Backfill alluvial excavation area with oversized rock spoils.
5	Finish Rough Grading Operations and Underground Work	2.5	Complete rough grading operations by removal of alluvial excavation and placement onsite. Bring final site to rough pad elevation. Complete underground utility placement and terminations.

**TABLE 6: Predicted Worst-Case Diesel Construction Engine Emissions**

Equipment Type Model	Selected EPA Tier Level	Quantity Used (#)	Engine Power Rating (HP)	Average Load Factor (%)	Duty Cycle (hrs/day)	SDAPCD Criteria Pollutants (pounds per day)					
						CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	ROG
Push Dozer D11T w/ Breaker	3	1	850	60	8	23.4	62.1	8.2	1.3	1.2	9.0
Push Dozer D10T	3	1	580	40	8	10.6	28.2	3.7	0.6	0.6	4.1
Dozer D9R	3	1	410	50	8	9.4	24.9	3.3	0.5	0.5	3.6
Dozer D6T LGP	3	1	200	40	8	3.7	9.7	1.3	0.2	0.2	1.4
Scraper- 657G Tractor	3	1	1050	30	8	14.4	38.3	5.0	0.8	0.8	5.6
Motor Grader 120K	3	2	125	50	8	8.2	15.2	2.0	0.5	0.4	2.2
Water Truck	3	1	200	40	8	3.7	9.7	1.3	0.2	0.2	1.4
Hydraulic Excavator 349EL	3	1	400	60	8	11.0	29.2	3.8	0.6	0.6	4.2
ECM 590 Rock Drill	3	2	220	50	8	10.1	26.8	3.5	0.6	0.5	3.9
<b>Sum:</b>		<b>11</b>				<b>94.5</b>	<b>244.2</b>	<b>32.1</b>	<b>5.5</b>	<b>5.0</b>	<b>35.4</b>
<b>SDAPCD Significance Threshold:</b>						<b>550</b>	<b>250</b>	<b>250</b>	<b>100</b>	<b>55</b>	<b>75</b>

Rounding margin of error ± 0.1.

Fugitive Dust Emission Levels (PM<sub>10</sub>, PM<sub>2.5</sub>)

Construction activities are also a source of fugitive dust emissions that may have a substantial, but temporary, impact on local air quality. These emissions are typically associated with land clearing, excavating, and construction of a proposed action. Substantial dust emissions also occur when vehicles travel on paved and unpaved surfaces, and haul trucks lose material.

Dust emissions and impacts vary substantially from day to day, depending on the level of activity, the specific operation being conducted, and the prevailing meteorological conditions. Wet dust suppression techniques, such as watering and/or applying chemical stabilization, would be used during construction to suppress the fine dust particulates from leaving the ground surface and becoming airborne through the action of mechanical disturbance or wind motion.

Grading operations are anticipated as being no greater than a worst-case 45,900 cubic-yards (cy) of cut/fill material moved over an anticipated 240-day earthwork period. For alluvium-type material, the project earthwork would have a total working weight of,

$$\text{Working Weight} = 45,900 \text{ cubic yards} \times \frac{1.3 \text{ tons}}{\text{cubic yard}} = 59,670.0 \text{ tons}$$

Out of the total quantity identified above, it is estimated that roughly 80-percent of the working weight would be capable of generating PM<sub>10</sub>. Thus, for the purposes of analysis, the working weight of earthwork material capable of generating some amount of PM<sub>10</sub> would be 47,736.0 tons. Thus, the average mass grading earthwork fill movement per day over the total 240 working days would be 198.9 tons/day.

Following the analysis procedure identified in the *SCAQMD CEQA Handbook* for PM<sub>10</sub> emissions from fugitive dust gives the following semi-empirical relationship for aggregate respirable dust generation,

$$PM_{10} = 0.00112 \cdot \left[ \frac{\left( \frac{WS}{5} \right)^{1.3}}{\left( \frac{SMC}{2} \right)^{1.4}} \right] \cdot ET$$

Where, PM<sub>10</sub> = Fugitive dust emissions in pounds, WS = Ambient wind speed, SMC = Surface Moisture Content, generally defined as the weight of the water (W<sub>w</sub>) divided by the weight of the soil (W<sub>s</sub>) as measured at the surface in grams per gram, and, ET = Earthwork Tonnage moved per day.

Substituting a minimum SMC value of 0.25 (which is extremely conservative for an ambient dirt/sand condition), and a maximum credible wind speed scenario of 12 MPH (WS = 12), gives the following result,

$$PM_{10} = 0.00112 \times \left[ \frac{\left(\frac{12}{5}\right)^{1.3}}{\left(\frac{0.25}{2}\right)^{1.4}} \right] \times 198.9 = 12.8$$

or a level of 12.8 pounds of PM<sub>10</sub> generated per day. It should be noted that surface wetting will be utilized during all phases of earthwork operations at a minimum level of three times per day; thus a control efficiency of 34% to 68% reduction in fugitive dust can be applied per the SCAQMD methodology.

Assuming a median 60% control efficiency, due to the aforementioned watering yields,

$$PM_{10} = (1 - 0.6) \cdot 12.8 = 5.1$$

or a total fugitive dust generated load of 5.1 pounds per day. This level is far below the 100 pounds per day threshold established by the SDAPCD. Therefore, no impacts are expected from this phase of construction. The commensurate PM<sub>2.5</sub> level would be 1.1 pounds per day, which is also below the proposed threshold of significance of 55 pounds per day for this pollutant.

Additionally, following the analysis methods identified in the *SCAQMD CEQA Handbook* for PM<sub>10</sub> emissions due to unpaved haul roads gives the following semi-empirical relationship for aggregate respirable dust generation,

$$PM_{10} = VMT \times \left[ 2.1 \left( \frac{SLP}{12} \right) \left( \frac{MVS}{30} \right) \left( \frac{MVW}{3} \right)^{0.7} \left( \frac{NW}{4} \right)^{0.5} \left( \frac{365 - RD}{365} \right) \right]$$

Where, PM<sub>10</sub> = Fugitive dust emissions in pounds due to haulage on unpaved roads, VMT = Vehicle Miles Traveled per day, SLP = Soil Silt Loading in Percent, MVS = Mean Vehicle Speed in miles per hour, MVW = Mean Vehicle Weight in tons, NW = Number of Wheels on the vehicle, and, RD = Mean number of Rain Days with at least 0.01 inches of precipitation.

Unpaved road travel due to construction activities is also unknown at this time. For the purposes of analysis, it will be assumed that contractors' vehicles moving onsite would traverse a total of 50 miles per day (VMT) during the earthwork and site preparation phases.

Substituting the applicable project values of VMT = 50, SLP = 6.0 (sand/gravel road with watering), MVS = 5 miles per hour, MVW = 20 tons (gross vehicular weight), NW = 10 wheels (average number of wheels), and RD<sup>36</sup> = 44.0 (rain days), gives the following result,

$$PM_{10} = 50.0 \times \left[ 2.1 \left( \frac{6}{12} \right) \left( \frac{5}{30} \right) \left( \frac{20}{3} \right)^{0.7} \left( \frac{10}{4} \right)^{0.5} \left( \frac{365 - 44}{365} \right) \right] = 45.9$$

or a level of 45.9 pounds of PM<sub>10</sub> generated per day. This activity alone would not generate a significant impact. The commensurate PM<sub>2.5</sub> level would be 9.7 pounds per day, which is also below the proposed threshold of significance identified above.

#### Blast Generated Emission Levels (CO, NO<sub>x</sub>, SO<sub>2</sub>, N<sub>2</sub>, CO<sub>2</sub>, and H<sub>2</sub>O)

An explosive is a chemical material that is capable of extremely rapid combustion (gas production) resulting in extremely high surface pressures. Since the combustion of any explosive occurs so rapidly, an adequate supply of oxygen to initiate the reaction cannot be drawn from the air. Thus, a source of oxygen must be incorporated into the explosive compound.

As in other combustion reactions, a deficiency of oxygen favors the formation of carbon monoxide and unburned organic compounds, and produces little, if any, nitrogen oxides. An excess of oxygen causes more nitrogen oxides and less carbon monoxide as well as other unburned organics.

Typical construction blasting favors the use of a mixture of ammonium nitrate (NH<sub>4</sub>NO<sub>3</sub>) and fuel oil (a hydrocarbon radical known as methylene or CH<sub>2</sub> which is a component of certain derivatives of methane). This compound is commonly abbreviated as ANFO. ANFO is widely utilized due to the low cost of utilization and the large amount of gas production per unit weight of explosive. The desired reaction products are nitrogen gas (N<sub>2</sub>), carbon dioxide (CO<sub>2</sub>) and water, although some CO and NO<sub>2</sub> are always formed.

Weight proportions of ingredients consistent with the stoichiometric reaction are 94.5 percent ammonium nitrate and 5.5 percent fuel oil. In actual practice the proportions are 94 percent and 6 percent to assure an efficient chemical reaction of the nitrate. For, a fuel oil content of more than 5.5 percent creates a deficiency of oxygen resulting in other trace pollutants (such as hydrocarbons).

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<sup>36</sup> Based upon U.S. Weather Service average precipitation year data for El Cajon, CA.

According to the AP-42 document, the anticipated criteria pollutant generation rate for ANFO would be 67 pounds of CO per ton (2,000 pounds) of explosive used. NO<sub>x</sub> generation would be 17 pounds per ton of explosive, and SO<sub>2</sub> would be two pounds per ton of ANFO. The remaining gaseous emissions would be nitrogen gas (N<sub>2</sub>), carbon dioxide (CO<sub>2</sub>) and water vapor as previously identified.

It is estimated at this time that a maximum of 2,500 cubic yards of rock material could be excavated from the site during rough grading preparation work. The estimated duration of blasting would be approximately 1.5 months, so the removal material would amount to roughly 2,500 / 45 or 55.6 cubic yards per day on average.<sup>37</sup>

Assuming that this is hard granitic material, the amount of rock excavated would be in the range of:

$$55.6 \text{ cubic yards} \times \frac{1.8 \text{ tons}}{\text{cubic yard}} = 100.1 \text{ tons}$$

or roughly 100.1 tons of rock per day. Typical powder factors for confined hard rock blasting are 1.5 pounds of ANFO per ton of rock. Thus, the estimated daily utilization of ANFO would be 150.2 pounds per day. This would give the following estimated daily compound generation levels:

$$\text{CO: } 67 \times \frac{150.2}{2000} = 5.03 \text{ pounds}$$

$$\text{NO}_x: 17 \times \frac{150.2}{2000} = 1.27 \text{ pounds}$$

$$\text{SO}_2: 2 \times \frac{150.2}{2000} = 0.15 \text{ pounds}$$

$$\text{N}_2, \text{CO}_2, \text{ and H}_2\text{O: } 150.2 - 5.03 - 1.27 - 0.15 = 143.75 \text{ pounds}$$

These levels would be added to the total construction emissions, since it is assumed that they would occur simultaneously with other construction grading operations.

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<sup>37</sup> This project is not proposing quarry or bench blasting as denoted in AP-42. Rather, the proposed project action will only be performing highly-confined down hole blasting in order to fracture rock structures having a high shear wave velocity. As a consequence of these types of blasts, ground vibration must be kept to a minimum, which naturally precludes fugitive dust generation.

Combustion-Fired Health-Risk Emission Levels (PM<sub>10</sub>, PM<sub>2.5</sub>)

Onsite construction equipment was found to generate worst-case aggregate daily pollutant levels during the rough grading phase. These emissions are assumed to occur over any given 24-hour day (thereby providing an upper bound on expected emission concentrations) and direct comparison with CAAQS standards.

Although all stable criteria pollutants are provided, it should be noted that for cancer-risk potential, only combustion-fired PM<sub>10</sub> particulates are considered, with PM<sub>2.5</sub> concentrations being determined through the aforementioned fractional emission estimates.

The proposed Lake Jennings Market Place project site has a maximum working footprint of roughly 570,636 square-feet (53,014 m<sup>2</sup>) based upon data obtained from the project site plans. The aggregate emission rates for the various criteria pollutants, in grams per second, and grams per square-meter (m<sup>2</sup>) per second, are shown in Table 7.<sup>38</sup> The expected combustion-fired construction emission concentrations from the SCREEN3 modeling are shown in Table 8. The output model results are provided as an attachment to this report.

**TABLE 7: Predicted Onsite Diesel-Fired Construction Emission Rates**

Criteria Pollutant	Max Daily Emissions (pounds)	Daily Site Emission Rates (grams/second)	Average Area Emission Rates (grams/m <sup>2</sup> /second)
CO	94.5	0.4959	9.3541E-06
NO <sub>x</sub>	244.2	1.2823	2.4187E-05
SO <sub>x</sub>	32.1	0.1686	3.1800E-06
<b>PM<sub>10</sub></b>	<b>5.5</b>	<b>0.0287</b>	<b>5.4108E-07</b>
PM <sub>2.5</sub>	5.0	0.0264	4.9780E-07

Total averaging time is 24 hours x 60 minutes/hour x 60 seconds/minute = 86,400 seconds per CAAQS standards. The area emission rates are shown in scientific notation and are expressed in the form of *mantissa-exponent* to base 10.

One pound-mass = 453.592 grams.

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<sup>38</sup> As a required input parameter for the SCREEN3 model.

**TABLE 8: SCREEN3 Predicted Diesel-Fired Emission Concentrations**

Criteria Pollutant	Pollutant Concentration ( $\mu\text{g}/\text{m}^3$ )	Pollutant Concentration (ppm)	Pollutant Risk Probability (percent risk per person for 70-year exposure)	Significant?
CO	131.50	0.1143	n/a	n/a
NO <sub>x</sub>	339.90	0.1808	n/a	n/a
SO <sub>x</sub>	44.69	0.0171	n/a	n/a
<b>PM<sub>10</sub></b>	<b>7.60</b>	--	<b>0.228%</b>	<b>No</b>
PM <sub>2.5</sub>	7.00	--	n/a	n/a

Diesel risk calculation based upon ARB 1999 Staff Report from the Scientific Review Panel (SRP) on Diesel Toxics inhaled in a 70-year lifetime.

Conversion Factors (approximate):

CO: 1 ppm = 1,150  $\mu\text{g}/\text{m}^3$  @ 25 deg-C STP, NO<sub>x</sub>: 1 ppm = 1,880  $\mu\text{g}/\text{m}^3$  @ 25 deg-C STP  
 SO<sub>x</sub>: 1 ppm = 2,620  $\mu\text{g}/\text{m}^3$  @ 25 deg-C STP, PM<sub>10</sub> and PM<sub>2.5</sub>: 1 ppm = 1 g/m<sup>3</sup> (solid)

PM<sub>2.5</sub> levels based upon the CEIDARS fractional emission factors for diesel construction equipment of 0.920 PM<sub>2.5</sub> / PM<sub>10</sub>.

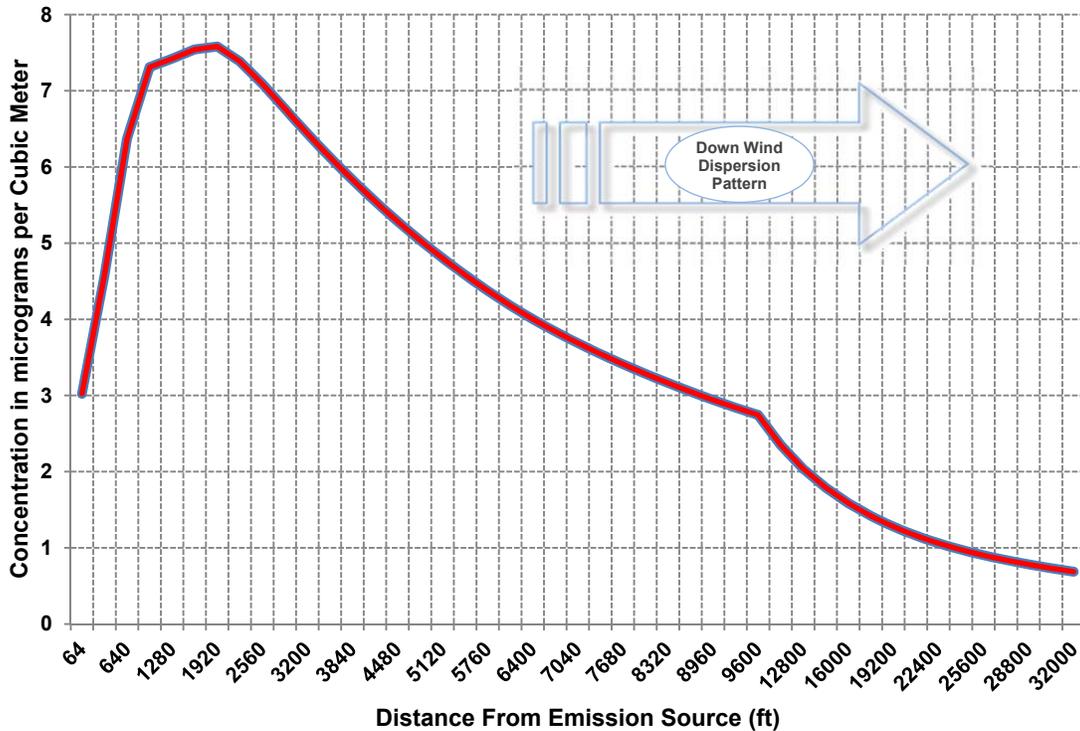
Based upon the model results, all criteria pollutants were below the recommended health risk level with a PM<sub>10</sub> risk probability of 0.228% per 70-year exposure duration, assuming the implementation of T-BACT. Given this, no significant carcinogenic impact potential is expected due to proposed grading operations.

Additionally, the analysis identified a worst-case PM<sub>10</sub> level of 7.6  $\mu\text{g}/\text{m}^3$  occurring at a distance of 559 meters (1,834 feet) from the project site. This pollutant concentration is below the California Ambient Air Quality Standard (CAAQS) of 50  $\mu\text{g}/\text{m}^3$  established by the State for any given 24-hour exposure period.

The predicted diesel-fired PM<sub>10</sub> dispersion pattern as a function of distance from the site can be seen in Figure 11. No cumulative contribution from the site would be physically possible beyond the extents identified in this figure.<sup>39</sup>

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<sup>39</sup> Which, assuming a standard Gaussian distribution, would yield an effective no impact distance of 7,336 feet (or 1.39 miles).



**FIGURE 11: Predicted Combustion-Fired Diesel PM<sub>10</sub> Dispersion Pattern (ISE 4/15)**

Finally, anticipated diesel-fired PM<sub>2.5</sub> levels would not be expected to exceed 6.9 µg/m<sup>3</sup>, which is also below the Federal NAAQS 24-hour threshold of 35 µg/m<sup>3</sup> (there are no State thresholds for this pollutant). No cumulative contribution of PM<sub>2.5</sub> from the site would be physically possible due to the reasons cited above.

VOC Emission Potential from Architectural Coatings

Following the analysis methods identified in the *SCAQMD CEQA Handbook* for Volatile Organic Compound (VOC) emissions due to architectural coatings gives the following semi-empirical relationship for aggregate emission levels,

$$VOC_{arch} = \left[ \frac{WT \times A}{1000} \right] \times CT$$

Where, VOC = Total pounds of Volatile Reactive Organic Compounds per day, WT = Specific VOC weight in pounds per mil per 1,000 square-foot application area, A = Total exterior and/or interior area to be coated in square-feet, and, CT = Required paint thickness in mils.

Due to the nature of the project design at this point, exact painting quantities are unknown. It is expected that the proposed Lake Jennings Market Place contractors could completely finish paint<sup>40</sup> a maximum of 5,000 square-feet (denoted as A) of usable surface area every day (denoted as ΔT). This yields the following modified expression:

$$VOC_{\text{arch}} = \left[ \frac{\frac{WT}{\Delta T} \times A}{1000} \right] \times CT$$

Substituting the applicable unmitigated project values of WT = 7.12 pounds of VOC per 1,000 square-feet of painted area<sup>41</sup>, ΔT = 1 day, A = 5,000 square-feet, CT = 2.0 mils (as the default value for two fast passes using an HVLP<sup>42</sup>) gives the following result,

$$VOC_{\text{arch}} = \left[ \frac{7.12 \times 5000}{1000 \times 1} \right] \times 2.0 = 71.2$$

This yields a total unmitigated architectural-generated VOC level of 71.2 pounds per day. It can be shown that the VOC load can be reduced by a factor of 2.56 / 7.12 = 0.36 through the application of Low VOC paints.<sup>43</sup> This would produce final VOC levels of 0.36 x 71.2 = 25.6 pounds of VOC per day. No remedial impacts would be expected.

### Odor Impact Potential from Proposed Site

The inhalation of VOC's causes smell sensations in humans. These odors can affect human health in four primary ways:

- The VOC's can produce toxicological effects;
- The odorant compounds can cause irritations in the eye, nose, and throat;
- The VOC's can stimulate sensory nerves that can cause potentially harmful health effects; and,
- The exposure to perceived unpleasant odors can stimulate negative cognitive and emotional responses based on previous experiences with such odors.

Development of the proposed project site could generate trace amounts (less than 1 μg/m<sup>3</sup>) of substances such as ammonia, carbon dioxide, hydrogen sulfide,

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<sup>40</sup> Finish painting implies, in the context of this report, complete surface area painting consisting of two coats as well as any required trim work. The referenced square-footage is the floor area square-footage per SCAQMD.

<sup>41</sup> Per SCAQMD CEQA Air Quality Handbook, Table A11-13-C.

<sup>42</sup> HVLP = High-Volume, Low-Pressure painting system.

<sup>43</sup> SCAQMD CEQA Handbook Table A11-13-C.

methane, dust, organic dust, and endotoxins (i.e., bacteria are present in the dust). Additionally, proposed onsite uses could generate substances such as volatile organic acids, alcohols, aldehydes, amines, fixed gases, carbonyls, esters, sulfides, disulfides, mercaptans, and nitrogen heterocycles.

It should be noted that odor generation impacts due to the project are not expected to be significant, since any odor generation would be intermittent and would terminate upon completion of the construction phase of the project. As a result, no significant air quality impacts are expected to surrounding residential receptors. No mitigation for odors is identified.

### **Project Vehicular Emission Levels**

The Lake Jennings Market Place site development project is expected to have a worst-case trip generation level of 4,683 ADT based upon the cumulative generation produced for the proposed project.<sup>44,45</sup> The average one-way trip length would be 3.5 miles given the average service radius of the proposed facility.<sup>46</sup> A median speed of 45 MPH was used, consistent with average values observed (i.e., combined highway and surface street traffic activity).

The calculated daily emission levels due to travel to and from the site are shown in Table 9. Based upon the findings, no significant impacts for any criteria pollutants were identified.

Additionally, it should be noted that using the SANDAG “adopted” land use for the Lake Jennings Market Place gives an aggregate vehicle-miles-traveled (VMT) of 1,611,546 VMT per day, while the proposed capture of the project site would generate 1,602,394 VMT per day. Thus, by virtue of constructing the proposed project, a net reduction of 9,152 VMT per day is achieved (i.e., the proposed project reduces overall vehicle travel, and commensurate aggregate air quality emissions, by capturing local traffic that would otherwise travel a further distance to go shopping). This is a net benefit of the project.

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<sup>44</sup> Source: Lake Jennings Market Place Traffic Impact Study, KOA Corporation, 4/15.

<sup>45</sup> Motor vehicles are the primary source of emissions associated with the proposed project area. Typically, uses such as the proposed project do not directly emit significant amounts of air pollutants from onsite activities. Rather, vehicular trips to and from these land uses are the significant contributor.

<sup>46</sup> Source: Ibid, KOA Corporation, 4/15.

**TABLE 9: Operational Trip Emissions – Lake Jennings Market Place Site Development Project**

EMFAC Year 2020 Emission Rates	Criteria Pollutant Rates (in grams/mile @ 45 MPH)					
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	ROG
Light Duty Auto (LDA)	0.799	0.088	0.003	0.001	0.001	0.018
Light Duty Truck (LDT1)	1.472	0.152	0.003	0.002	0.002	0.027
Medium Duty Truck (LHD1)	0.790	0.392	0.005	0.001	0.001	0.039
Heavy Duty Truck Gasoline (MH GAS)	1.483	0.552	0.013	0.001	0.001	0.044
Heavy Duty Truck Diesel (MH DSL)	0.503	5.781	0.000	0.125	0.115	0.109
Motorcycle (MCY)	17.790	1.168	0.002	0.000	0.000	2.033

Proposed Project Action	Aggregate Trip Emissions (in pounds/day)						
	ADT	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	ROG
Light Duty Auto (LDA)	3,231	19.91	2.19	0.07	0.03	0.0	0.45
Light Duty Truck (LDT1)	909	10.32	1.07	0.02	0.01	0.0	0.19
Medium Duty Truck (LHD1)	300	1.83	0.91	0.01	0.00	0.0	0.09
Heavy Duty Truck Gasoline (MH GAS)	56	0.64	0.24	0.01	0.00	0.0	0.02
Heavy Duty Truck Diesel (MH DSL)	169	0.65	7.52	0.00	0.16	0.1	0.14
Motorcycle (MCY)	19	2.57	0.17	0.00	0.00	0.0	0.29
<b>Total:</b>	<b>4,683</b>	<b>35.9</b>	<b>12.1</b>	<b>0.1</b>	<b>0.2</b>	<b>0.2</b>	<b>1.2</b>

<b>SDAPCD Significance Threshold:</b>	<b>550</b>	<b>250</b>	<b>250</b>	<b>100</b>	<b>55</b>	<b>75</b>
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Source CARB EMFAC 2011 Model  
 Rounding data margin of error ± 0.1.  
 Values rounded to closest whole integer vehicle.

**Predicted Traffic Segment Pollutant Concentration Levels**

Tables 10a through –f, starting on the following page, lists the roadway segments identified by the traffic engineer for the existing conditions, and existing conditions plus project scenario, as well as the predicted peak hour traffic volume, and the expected CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions at 100 feet from the road centerline (minimum possible standing receptor distance).

Based upon the dispersion model findings, no localized criteria pollutant impacts were identified for any roadway segment examined. The roadway segments examined were found to comply with the CAAQS and NAAQS standards.

**TABLE 10a: Incremental Traffic Segment Pollutant Increases (Existing Conditions)**

Roadway	Segment	LOS	ADT	Δ CO (ppm)	Δ NO <sub>x</sub> (pphm)	Δ PM <sub>10</sub> (ppm)	Δ PM <sub>2.5</sub> (ppm)
<b>Olde Highway 80</b>	Lake Jennings Park Rd. to Driveway 1	E	14,350	0.1	0.6	0.4	0.4
	Project Driveway 1 to Driveway 2	E	14,350	0.1	0.6	0.4	0.4
	Project Driveway 2 to Driveway 3	E	14,350	0.1	0.6	0.4	0.4
	Project Driveway 3 to Rios Canyon Rd.	E	14,350	0.1	0.6	0.4	0.4
	Rios Canyon Rd. to Pecan Park Ln.	D	10,150	0.0	0.6	0.3	0.3
	Pecan Park Ln. to Chimney Rock Ln.	D	10,050	0.0	0.6	0.3	0.3
<b>Mapleview Street</b>	Ashwood St. to Pino Dr.	A	12,000	0.1	0.6	0.4	0.4
<b>Lake Jennings Park Road</b>	Pino Dr. to El Monte Rd.	A	10,400	0.0	0.6	0.3	0.3
	El Monte Rd. to Jack Oak Rd.	D	11,260	0.1	0.6	0.4	0.4
	Jack Oak Rd. to Harritt Rd.	D	11,520	0.1	0.6	0.4	0.4
	Harrit Rd. to Blossom Valley Rd.	E	13,550	0.1	0.6	0.4	0.4
	Blossom Valley Rd. to I-8 WB Off-Ramp	E	18,510	0.1	0.7	0.5	0.5
	I-8 WB Off-Ramp to Olde Highway 80	F	17,130	0.1	0.7	0.5	0.5
	Olde Highway 80 to Project Driveway 4	A	1,670	0.0	0.3	0.1	0.1
<b>Ridge Hill Road</b>	Lake Jennings Park Rd. to Cordial Rd.	Better than C	1,670	0.0	0.3	0.1	0.1
<b>Rios Canyon Road</b>	South of Olde Highway 80	Better than C	3,506	0.0	0.4	0.2	0.2

**TABLE 10b: Incremental Traffic Segment Pollutant Increases (Existing + Project Conditions)**

Roadway	Segment	LOS	ADT	Δ CO (ppm)	Δ NO <sub>x</sub> (pphm)	Δ PM <sub>10</sub> (ppm)	Δ PM <sub>2.5</sub> (ppm)
<b>Olde Highway 80</b>	Lake Jennings Park Rd. to Driveway 1	F	21,934	0.1	0.7	0.6	0.6
	Project Driveway 1 to Driveway 2	F	21,363	0.1	0.7	0.6	0.6
	Project Driveway 2 to Driveway 3	E	15,911	0.1	0.6	0.5	0.5
	Project Driveway 3 to Rios Canyon Rd.	E	15,746	0.1	0.6	0.5	0.5
	Rios Canyon Rd. to Pecan Park Ln.	E	11,081	0.1	0.6	0.4	0.4
	Pecan Park Ln. to Chimney Rock Ln.	D	10,972	0.1	0.6	0.4	0.4
<b>Mapleview Street</b>	Ashwood St. to Pino Dr.	A	12,721	0.1	0.6	0.4	0.4
<b>Lake Jennings Park Road</b>	Pino Dr. to El Monte Rd.	A	11,149	0.1	0.6	0.4	0.4
	El Monte Rd. to Jack Oak Rd.	D	12,225	0.1	0.6	0.4	0.4
	Jack Oak Rd. to Harritt Rd.	D	13,289	0.1	0.6	0.4	0.4
	Harrit Rd. to Blossom Valley Rd.	E	15,776	0.1	0.6	0.5	0.5
	Blossom Valley Rd. to I-8 WB Off-Ramp	F	21,827	0.1	0.7	0.6	0.6
	I-8 WB Off-Ramp to Olde Highway 80	F	22,258	0.1	0.7	0.6	0.6
	Olde Highway 80 to Project Driveway 4	B	2,934	0.0	0.4	0.2	0.2
<b>Ridge Hill Road</b>	Lake Jennings Park Rd. to Cordial Rd.	Better than C	2,102	0.0	0.4	0.1	0.1
<b>Rios Canyon Road</b>	South of Olde Highway 80	Better than C	3,794	0.0	0.4	0.2	0.2

**TABLE 10c: Incremental Traffic Segment Pollutant Increases (Cumulative Conditions)**

Roadway	Segment	LOS	ADT	Δ CO (ppm)	Δ NO <sub>x</sub> (pphm)	Δ PM <sub>10</sub> (ppm)	Δ PM <sub>2.5</sub> (ppm)
<b>Olde Highway 80</b>	Lake Jennings Park Rd. to Driveway 1	E	15,072	0.1	0.6	0.4	0.4
	Project Driveway 1 to Driveway 2	E	15,072	0.1	0.6	0.4	0.4
	Project Driveway 2 to Driveway 3	E	15,072	0.1	0.6	0.4	0.4
	Project Driveway 3 to Rios Canyon Rd.	E	15,072	0.1	0.6	0.4	0.4
	Rios Canyon Rd. to Pecan Park Ln.	D	10,661	0.0	0.6	0.3	0.3
	Pecan Park Ln. to Chimney Rock Ln.	D	10,556	0.0	0.6	0.3	0.3
<b>Mapleview Street</b>	Ashwood St. to Pino Dr.	A	12,604	0.1	0.6	0.4	0.4
<b>Lake Jennings Park Road</b>	Pino Dr. to El Monte Rd.	A	10,923	0.1	0.6	0.4	0.4
	El Monte Rd. to Jack Oak Rd.	D	11,827	0.1	0.6	0.4	0.4
	Jack Oak Rd. to Harritt Rd.	D	12,100	0.1	0.6	0.4	0.4
	Harritt Rd. to Blossom Valley Rd.	E	14,232	0.1	0.6	0.4	0.4
	Blossom Valley Rd. to I-8 WB Off-Ramp	F	19,442	0.1	0.7	0.5	0.5
	I-8 WB Off-Ramp to Olde Highway 80	F	17,992	0.1	0.7	0.5	0.5
	Olde Highway 80 to Project Driveway 4	A	1,754	0.0	0.3	0.1	0.1
<b>Ridge Hill Road</b>	Lake Jennings Park Rd. to Cordial Rd.	Better than C	1,754	0.0	0.3	0.1	0.1
<b>Rios Canyon Road</b>	South of Olde Highway 80	Better than C	3,682	0.0	0.4	0.2	0.2

**TABLE 10d: Incremental Traffic Segment Pollutant Increases (Cumulative + Project Conditions)**

Roadway	Segment	LOS	ADT	Δ CO (ppm)	Δ NO <sub>x</sub> (pphm)	Δ PM <sub>10</sub> (ppm)	Δ PM <sub>2.5</sub> (ppm)
<b>Olde Highway 80</b>	Lake Jennings Park Rd. to Driveway 1	F	23,428	0.1	0.7	0.6	0.6
	Project Driveway 1 to Driveway 2	F	22,856	0.1	0.7	0.6	0.6
	Project Driveway 2 to Driveway 3	F	16,720	0.1	0.7	0.5	0.5
	Project Driveway 3 to Rios Canyon Rd.	F	16,555	0.1	0.7	0.5	0.5
	Rios Canyon Rd. to Pecan Park Ln.	E	11,679	0.1	0.6	0.4	0.4
	Pecan Park Ln. to Chimney Rock Ln.	D	11,565	0.1	0.6	0.4	0.4
<b>Mapleview Street</b>	Ashwood St. to Pino Dr.	A	13,325	0.1	0.6	0.4	0.4
<b>Lake Jennings Park Road</b>	Pino Dr. to El Monte Rd.	A	11,673	0.1	0.6	0.4	0.4
	El Monte Rd. to Jack Oak Rd.	D	12,791	0.1	0.6	0.4	0.4
	Jack Oak Rd. to Harritt Rd.	E	13,954	0.1	0.6	0.4	0.4
	Harrit Rd. to Blossom Valley Rd.	E	16,657	0.1	0.7	0.5	0.5
	Blossom Valley Rd. to I-8 WB Off-Ramp	F	22,931	0.1	0.7	0.6	0.6
	I-8 WB Off-Ramp to Olde Highway 80	F	23,703	0.1	0.7	0.6	0.6
	Olde Highway 80 to Project Driveway 4	B	3,018	0.0	0.4	0.2	0.2
<b>Ridge Hill Road</b>	Lake Jennings Park Rd. to Cordial Rd.	Better than C	2,186	0.0	0.4	0.1	0.1
<b>Rios Canyon Road</b>	South of Olde Highway 80	Better than C	3,970	0.0	0.4	0.2	0.2

**TABLE 10e: Incremental Traffic Segment Pollutant Increases (General Plan Build Out Conditions)**

Roadway	Segment	LOS	ADT	Δ CO (ppm)	Δ NO <sub>x</sub> (pphm)	Δ PM <sub>10</sub> (ppm)	Δ PM <sub>2.5</sub> (ppm)
<b>Olde Highway 80</b>	Lake Jennings Park Rd. to Driveway 1	F	19,406	0.1	0.7	0.5	0.5
	Project Driveway 1 to Driveway 2	F	19,406	0.1	0.7	0.5	0.5
	Project Driveway 2 to Driveway 3	F	19,406	0.1	0.7	0.5	0.5
	Project Driveway 3 to Rios Canyon Rd.	F	19,406	0.1	0.7	0.5	0.5
	Rios Canyon Rd. to Pecan Park Ln.	E	13,726	0.1	0.6	0.4	0.4
	Pecan Park Ln. to Chimney Rock Ln.	E	13,591	0.1	0.6	0.4	0.4
<b>Mapleview Street</b>	Ashwood St. to Pino Dr.	B	16,228	0.1	0.6	0.5	0.5
<b>Lake Jennings Park Road</b>	Pino Dr. to El Monte Rd.	B	14,064	0.1	0.6	0.4	0.4
	El Monte Rd. to Jack Oak Rd.	E	15,227	0.1	0.6	0.4	0.4
	Jack Oak Rd. to Harritt Rd.	E	15,579	0.1	0.6	0.5	0.4
	Harrit Rd. to Blossom Valley Rd.	E	18,324	0.1	0.7	0.5	0.5
	Blossom Valley Rd. to I-8 WB Off-Ramp	F	25,032	0.1	0.8	0.6	0.6
	I-8 WB Off-Ramp to Olde Highway 80	F	23,165	0.1	0.7	0.6	0.6
	Olde Highway 80 to Project Driveway 4	B	2,258	0.0	0.4	0.1	0.1
<b>Ridge Hill Road</b>	Lake Jennings Park Rd. to Cordial Rd.	Better than C	2,258	0.0	0.4	0.1	0.1
<b>Rios Canyon Road</b>	South of Olde Highway 80	Worse than C	4,741	0.0	0.4	0.2	0.2

**TABLE 10f: Incremental Traffic Segment Pollutant Increases (General Plan Build Out + Project Conditions)**

<b>Roadway</b>	<b>Segment</b>	<b>LOS</b>	<b>ADT</b>	<b>Δ CO (ppm)</b>	<b>Δ NO<sub>x</sub> (pphm)</b>	<b>Δ PM<sub>10</sub> (ppm)</b>	<b>Δ PM<sub>2.5</sub> (ppm)</b>
<b>Olde Highway 80</b>	Lake Jennings Park Rd. to Driveway 1	F	26,990	0.1	0.8	0.7	0.7
	Project Driveway 1 to Driveway 2	F	26,419	0.1	0.8	0.7	0.7
	Project Driveway 2 to Driveway 3	F	20,967	0.1	0.7	0.6	0.6
	Project Driveway 3 to Rios Canyon Rd.	F	20,802	0.1	0.7	0.6	0.6
	Rios Canyon Rd. to Pecan Park Ln.	E	14,657	0.1	0.6	0.4	0.4
	Pecan Park Ln. to Chimney Rock Ln.	E	14,513	0.1	0.6	0.4	0.4
<b>Mapleview Street</b>	Ashwood St. to Pino Dr.	B	16,949	0.1	0.7	0.5	0.5
<b>Lake Jennings Park Road</b>	Pino Dr. to El Monte Rd.	B	14,814	0.1	0.6	0.4	0.4
	El Monte Rd. to Jack Oak Rd.	E	16,192	0.1	0.6	0.5	0.5
	Jack Oak Rd. to Harritt Rd.	E	17,347	0.1	0.7	0.5	0.5
	Harritt Rd. to Blossom Valley Rd.	F	20,550	0.1	0.7	0.6	0.6
	Blossom Valley Rd. to I-8 WB Off-Ramp	F	28,349	0.1	0.8	0.7	0.7
	I-8 WB Off-Ramp to Olde Highway 80	F	28,293	0.1	0.8	0.7	0.7
	Olde Highway 80 to Project Driveway 4	B	3,522	0.0	0.4	0.2	0.2
<b>Ridge Hill Road</b>	Lake Jennings Park Rd. to Cordial Rd.	Better than C	2,690	0.0	0.4	0.1	0.1
<b>Rios Canyon Road</b>	South of Olde Highway 80	Worse than C	5,029	0.0	0.4	0.2	0.2

**Predicted Operational Emission Levels**

As previously discussed, fixed emission sources under this context would consist entirely of small gasoline engines used with lawn mowers and landscaping equipment as well as emissive sources from natural gas powered appliances such as hot water heaters, stoves, etc. Each of these sources is discussed in detail below.

Small Gasoline Engine Emission Sources

Landscaping equipment utilized in the course of maintenance of the Lake Jennings Market Place project site typically would consist of a five horsepower four-stroke lawnmower and a small weed trimmer having a two-stroke engine with approximately 30 to 50 cubic-centimeters of displacement.<sup>47</sup>

For the purposes of analysis, the project site will be treated as a {CARB-classified} commercial area consisting of an aggregate of 15 retail business spaces comprising 76,100 square-feet. This equates to the following fixed emission levels in pounds per day for the aggregate of the proposed project development plan:

Land Use Type	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	ROG
Retail Use Space	4.1	0.1	0.0	0.0	0.5

These sources would be classified as insignificant emission sources and would not generate an air quality impact.

Natural Gas Emission Sources

Natural gas consumption (typically due to usage of central heating units and water heaters) would produce the following approximate total pounds of combustion emissions:

$$CP_{\text{combustion}} = ER \times \left[ \frac{NU \times UR}{30} \right] \times 1 \times 10^{-6}$$

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<sup>47</sup> Assuming cleaner burning engines purchased new by the ultimate user, the following emissions rates are projected by CARB:

Pollutant	Single-Family Emissions Per Unit (lb/day)	Multi-Family/Retail Emissions Per Unit (lb/day)
CO	0.00576	0.276
NO <sub>x</sub>	0.00014	0.005
SO <sub>x</sub>	0.0002	0.0001
PM <sub>10</sub>	0.000005	0.00037
ROG	0.00054	0.0315

It should be noted that these emission factors are also the identical emission factors utilized by the URBEMIS model.

Where, CP = The criteria pollutant under examination (i.e., CO, NO<sub>x</sub>, PM<sub>10</sub>, or ROG), ER = Emissions rate of criteria pollutant per million-cubic-feet of natural gas consumed (e.g., CO = 40 pounds/MM Cubic-feet, NO<sub>x</sub> = 94 pounds/MM Cubic-feet, PM<sub>10</sub> = 0.18 pounds/MM Cubic-feet, ROG = 7.26 pounds/MM Cubic-feet), NU = Total number of units per land use type (i.e., residential/commercial), and UR = Specific natural gas usage rate per development type (Single-Family = 6,665 ft<sup>3</sup>/month, Multi-family = 4,011.5 ft<sup>3</sup>/month, Retail Space = 2.9 ft<sup>3</sup>/SF/month).

As before, the project site will be treated as a {CARB-classified} commercial area consisting of an aggregate of 15 retail business spaces comprising 76,100 square-feet. This again equates to the following fixed emission levels in pounds per day for the aggregate of the proposed development plan:

<b>Land Use Type</b>	<b>CO</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>ROG</b>
Retail Use Space	0.3	0.7	--	0.0	0.1

These sources would be classified as insignificant emission sources and would not generate an air quality impact.



## CONCLUSIONS AND RECOMMENDATIONS

The aggregate emission levels produced by the proposed Lake Jennings Market Place development plan are shown in Table 11. Based upon the findings, no construction or operational air quality impacts are anticipated during either the construction or operational phases of the project.

**TABLE 11: Aggregate Emissions Synopsis – Lake Jennings Market Place Site Development Project**

SCENARIO EXAMINED	Aggregate Emissions (in pounds/day) <sup>48</sup>					
	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	ROG
<b>Construction Grading Operations</b>						
Construction Grading Vehicle Emissions	94.5	244.2	32.1	5.5	5.0	35.4
Surface Grading Dust Generation	--	--	--	5.1	1.1	--
Powered Haulage Dust Generation	0.0	0.0	0.0	45.9	9.7	0.0
Rock Blasting Emission Generation	5.03	1.27	0.15	--	--	--
<b>Total (Σ)</b>	<b>99.5</b>	<b>245.5</b>	<b>32.3</b>	<b>56.5</b>	<b>15.8</b>	<b>35.4</b>
<b>Construction Building Operations</b>						
Architectural Coating Application						71.2
<b>Unmitigated Total (Σ)</b>	--	--	--	--	--	71.2
With Low VOC Paint Application (Σ)	--	--	--	--	--	25.6
<b>Project Operations</b>						
Vehicular Traffic Generation	35.9	12.1	0.1	0.2	0.2	1.2
Fixed Source #1 (Small Engine Usage - Retail)	4.1	0.1	0.0	0.0	--	0.5
Fixed Source #2 (Natural Gas Combustion - Retail)	0.3	0.7	--	0.0	--	0.1
<b>Total (Σ)</b>	<b>40.4</b>	<b>12.9</b>	<b>0.1</b>	<b>0.2</b>	<b>0.2</b>	<b>1.7</b>
<b>SDAPCD Significance Threshold:</b>	<b>550</b>	<b>250</b>	<b>250</b>	<b>100</b>	<b>55</b>	<b>75</b>

Rounding margin of error ± 0.1.

<sup>48</sup> PM<sub>2.5</sub> emissions are not currently regulated by CARB. Values shown in this column are for informational purposes only.



## **CERTIFICATION OF ACCURACY AND QUALIFICATIONS**

This report was prepared by Investigative Science and Engineering, Inc. (ISE), located at 1134 D Street, Ramona, CA 92065. The members of its professional staff contributing to the report are listed below:

Rick Tavares ( <i>rtavares@ise.us</i> )	Ph.D. Civil Engineering M.S. Structural Engineering M.S. Mechanical Engineering B.S. Aerospace Engineering / Engineering Mechanics
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ISE affirms to the best of its knowledge and belief that the statements and information contained herein are in all respects true and correct as of the date of this report. Content and information contained within this report is intended only for the subject project and is protected under 17 U.S.C. §§ 101 through 810.

Should the reader have any questions regarding the findings and conclusions presented in this report, please do not hesitate to contact ISE at (760) 787-0016.

*Approved as to Form and Content:*

Rick Tavares, Ph.D.

Project Principal  
*Investigative Science and Engineering, Inc. (ISE)*



## APPENDICIES AND SUPPLEMENTAL INFORMATION

### SCREEN3 Model Output for Criteria Pollutants: CO, NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub>

```

1  LJMP GRADING AND SITE PREPARATION - CO
2
3  SIMPLE TERRAIN INPUTS:
4  SOURCE TYPE = AREA
5  EMISSION RATE (G/(S-M**2)) = .935410E-05
6  SOURCE HEIGHT (M) = 3.0000
7  LENGTH OF LARGER SIDE (M) = 230.2000
8  LENGTH OF SMALLER SIDE (M) = 230.2000
9  RECEPTOR HEIGHT (M) = 10.0000
10 URBAN/RURAL OPTION = RURAL
11 THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
12 THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.
13
14 MODEL ESTIMATES DIRECTION TO MAX CONCENTRATION
15
16
17 BUOY. FLUX = .000 M**4/S**3; MOM. FLUX = .000 M**4/S**2.
18
19 *** FULL METEOROLOGY ***
20
21 *****
22 *** SCREEN AUTOMATED DISTANCES ***
23 *****
24
25 *** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***
26
27 DIST CONC U10M USTK MIX HT PLUME MAX DIR
28 (M) (UG/M**3) STAB (M/S) (M/S) (M) HT (M) (DEG)
29 -----
30 20. 52.25 2 1.0 1.0 320.0 3.00 45.
31 100. 79.15 3 1.0 1.0 320.0 3.00 45.
32 200. 110.1 4 1.0 1.0 320.0 3.00 45.
33 300. 126.4 5 1.0 1.0 10000.0 3.00 45.
34 400. 128.3 5 1.0 1.0 10000.0 3.00 45.
35 500. 130.4 6 1.0 1.0 10000.0 3.00 45.
36 600. 131.1 6 1.0 1.0 10000.0 3.00 45.
37 700. 127.7 6 1.0 1.0 10000.0 3.00 45.
38 800. 122.6 6 1.0 1.0 10000.0 3.00 45.
39 900. 117.0 6 1.0 1.0 10000.0 3.00 45.
40 1000. 111.3 6 1.0 1.0 10000.0 3.00 45.
41 1100. 105.9 6 1.0 1.0 10000.0 3.00 45.
42 1200. 100.8 6 1.0 1.0 10000.0 3.00 45.
43 1300. 95.96 6 1.0 1.0 10000.0 3.00 45.
44 1400. 91.39 6 1.0 1.0 10000.0 3.00 45.
45 1500. 87.08 6 1.0 1.0 10000.0 3.00 45.
46 1600. 83.03 6 1.0 1.0 10000.0 3.00 45.
47 1700. 79.23 6 1.0 1.0 10000.0 3.00 45.
48 1800. 75.65 6 1.0 1.0 10000.0 3.00 45.
    
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49	1900.	72.28	6	1.0	1.0	10000.0	3.00	45.
50	2000.	69.19	6	1.0	1.0	10000.0	3.00	45.
51	2100.	66.36	6	1.0	1.0	10000.0	3.00	45.
52	2200.	63.76	6	1.0	1.0	10000.0	3.00	45.
53	2300.	61.30	6	1.0	1.0	10000.0	3.00	45.
54	2400.	58.98	6	1.0	1.0	10000.0	3.00	44.
55	2500.	56.78	6	1.0	1.0	10000.0	3.00	45.
56	2600.	54.70	6	1.0	1.0	10000.0	3.00	44.
57	2700.	52.73	6	1.0	1.0	10000.0	3.00	45.
58	2800.	50.86	6	1.0	1.0	10000.0	3.00	45.
59	2900.	49.09	6	1.0	1.0	10000.0	3.00	45.
60	3000.	47.44	6	1.0	1.0	10000.0	3.00	44.
61	3500.	40.62	6	1.0	1.0	10000.0	3.00	45.
62	4000.	35.26	6	1.0	1.0	10000.0	3.00	45.
63	4500.	30.94	6	1.0	1.0	10000.0	3.00	42.
64	5000.	27.43	6	1.0	1.0	10000.0	3.00	44.
65	5500.	24.53	6	1.0	1.0	10000.0	3.00	44.
66	6000.	22.11	6	1.0	1.0	10000.0	3.00	41.
67	6500.	20.06	6	1.0	1.0	10000.0	3.00	38.
68	7000.	18.32	6	1.0	1.0	10000.0	3.00	45.
69	7500.	16.87	6	1.0	1.0	10000.0	3.00	45.
70	8000.	15.61	6	1.0	1.0	10000.0	3.00	35.
71	8500.	14.50	6	1.0	1.0	10000.0	3.00	39.
72	9000.	13.53	6	1.0	1.0	10000.0	3.00	43.
73	9500.	12.66	6	1.0	1.0	10000.0	3.00	43.
74	10000.	11.88	6	1.0	1.0	10000.0	3.00	32.

75								
76	MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 20. M:							
77	559.	131.5	6	1.0	1.0	10000.0	3.00	45.

78  
 79 \*\*\*\*\*  
 80 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 81 \*\*\*\*\*

82								
83	CALCULATION	MAX CONC	DIST TO	TERRAIN				
84	PROCEDURE	(UG/M**3)	MAX (M)	HT (M)				
85	-----	-----	-----	-----				
86	SIMPLE TERRAIN	131.5	559.	0.				

```

1  LJMP GRADING GRADING AND SITE PREPARATION - NOX
2
3  SIMPLE TERRAIN INPUTS:
4  SOURCE TYPE = AREA
5  EMISSION RATE (G/(S-M**2)) = .241870E-04
6  SOURCE HEIGHT (M) = 3.0000
7  LENGTH OF LARGER SIDE (M) = 230.2000
8  LENGTH OF SMALLER SIDE (M) = 230.2000
9  RECEPTOR HEIGHT (M) = 10.0000
10 URBAN/RURAL OPTION = RURAL
11 THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
12 THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.
13
14 MODEL ESTIMATES DIRECTION TO MAX CONCENTRATION
15
16
17 BUOY. FLUX = .000 M**4/S**3; MOM. FLUX = .000 M**4/S**2.
18
19 *** FULL METEOROLOGY ***
20
21 *****
22 *** SCREEN AUTOMATED DISTANCES ***
23 *****
24
25 *** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***
26
27 DIST CONC U10M USTK MIX HT PLUME MAX DIR
28 (M) (UG/M**3) STAB (M/S) (M/S) (M) HT (M) (DEG)
29 -----
30 20. 135.1 2 1.0 1.0 320.0 3.00 45.
31 100. 204.7 3 1.0 1.0 320.0 3.00 45.
32 200. 284.7 4 1.0 1.0 320.0 3.00 45.
33 300. 326.8 5 1.0 1.0 10000.0 3.00 45.
34 400. 331.8 5 1.0 1.0 10000.0 3.00 45.
35 500. 337.2 6 1.0 1.0 10000.0 3.00 45.
36 600. 338.9 6 1.0 1.0 10000.0 3.00 45.
37 700. 330.2 6 1.0 1.0 10000.0 3.00 45.
38 800. 317.0 6 1.0 1.0 10000.0 3.00 45.
39 900. 302.5 6 1.0 1.0 10000.0 3.00 45.
40 1000. 287.9 6 1.0 1.0 10000.0 3.00 45.
41 1100. 273.9 6 1.0 1.0 10000.0 3.00 45.
42 1200. 260.6 6 1.0 1.0 10000.0 3.00 45.
43 1300. 248.1 6 1.0 1.0 10000.0 3.00 45.
44 1400. 236.3 6 1.0 1.0 10000.0 3.00 45.
45 1500. 225.2 6 1.0 1.0 10000.0 3.00 45.
46 1600. 214.7 6 1.0 1.0 10000.0 3.00 45.
47 1700. 204.9 6 1.0 1.0 10000.0 3.00 45.
48 1800. 195.6 6 1.0 1.0 10000.0 3.00 45.
    
```

49	1900.	186.9	6	1.0	1.0	10000.0	3.00	45.
50	2000.	178.9	6	1.0	1.0	10000.0	3.00	45.
51	2100.	171.6	6	1.0	1.0	10000.0	3.00	45.
52	2200.	164.9	6	1.0	1.0	10000.0	3.00	45.
53	2300.	158.5	6	1.0	1.0	10000.0	3.00	45.
54	2400.	152.5	6	1.0	1.0	10000.0	3.00	44.
55	2500.	146.8	6	1.0	1.0	10000.0	3.00	45.
56	2600.	141.4	6	1.0	1.0	10000.0	3.00	44.
57	2700.	136.3	6	1.0	1.0	10000.0	3.00	45.
58	2800.	131.5	6	1.0	1.0	10000.0	3.00	45.
59	2900.	126.9	6	1.0	1.0	10000.0	3.00	45.
60	3000.	122.7	6	1.0	1.0	10000.0	3.00	44.
61	3500.	105.0	6	1.0	1.0	10000.0	3.00	45.
62	4000.	91.17	6	1.0	1.0	10000.0	3.00	45.
63	4500.	80.01	6	1.0	1.0	10000.0	3.00	42.
64	5000.	70.93	6	1.0	1.0	10000.0	3.00	44.
65	5500.	63.43	6	1.0	1.0	10000.0	3.00	44.
66	6000.	57.16	6	1.0	1.0	10000.0	3.00	41.
67	6500.	51.88	6	1.0	1.0	10000.0	3.00	38.
68	7000.	47.37	6	1.0	1.0	10000.0	3.00	45.
69	7500.	43.62	6	1.0	1.0	10000.0	3.00	45.
70	8000.	40.36	6	1.0	1.0	10000.0	3.00	35.
71	8500.	37.50	6	1.0	1.0	10000.0	3.00	39.
72	9000.	34.97	6	1.0	1.0	10000.0	3.00	43.
73	9500.	32.73	6	1.0	1.0	10000.0	3.00	43.
74	10000.	30.73	6	1.0	1.0	10000.0	3.00	32.

75								
76	MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 20. M:							
77	559.	339.9	6	1.0	1.0	10000.0	3.00	45.

78  
 79 \*\*\*\*\*  
 80 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 81 \*\*\*\*\*

82								
83	CALCULATION	MAX CONC	DIST TO	TERRAIN				
84	PROCEDURE	(UG/M**3)	MAX (M)	HT (M)				
85	-----	-----	-----	-----				
86	SIMPLE TERRAIN	339.9	559.	0.				

```

1  LJMP GRADING AND SITE PREPARATION - SOX
2
3  SIMPLE TERRAIN INPUTS:
4  SOURCE TYPE = AREA
5  EMISSION RATE (G/(S-M**2)) = .318000E-05
6  SOURCE HEIGHT (M) = 3.0000
7  LENGTH OF LARGER SIDE (M) = 230.2000
8  LENGTH OF SMALLER SIDE (M) = 230.2000
9  RECEPTOR HEIGHT (M) = 10.0000
10 URBAN/RURAL OPTION = RURAL
11 THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
12 THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.
13
14 MODEL ESTIMATES DIRECTION TO MAX CONCENTRATION
15
16
17 BUOY. FLUX = .000 M**4/S**3; MOM. FLUX = .000 M**4/S**2.
18
19 *** FULL METEOROLOGY ***
20
21 *****
22 *** SCREEN AUTOMATED DISTANCES ***
23 *****
24
25 *** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***
26
27 DIST CONC U10M USTK MIX HT PLUME MAX DIR
28 (M) (UG/M**3) STAB (M/S) (M/S) (M) HT (M) (DEG)
29 -----
30 20. 17.76 2 1.0 1.0 320.0 3.00 45.
31 100. 26.91 3 1.0 1.0 320.0 3.00 45.
32 200. 37.43 4 1.0 1.0 320.0 3.00 45.
33 300. 42.97 5 1.0 1.0 10000.0 3.00 45.
34 400. 43.62 5 1.0 1.0 10000.0 3.00 45.
35 500. 44.33 6 1.0 1.0 10000.0 3.00 45.
36 600. 44.55 6 1.0 1.0 10000.0 3.00 45.
37 700. 43.41 6 1.0 1.0 10000.0 3.00 45.
38 800. 41.68 6 1.0 1.0 10000.0 3.00 45.
39 900. 39.77 6 1.0 1.0 10000.0 3.00 45.
40 1000. 37.85 6 1.0 1.0 10000.0 3.00 45.
41 1100. 36.01 6 1.0 1.0 10000.0 3.00 45.
42 1200. 34.27 6 1.0 1.0 10000.0 3.00 45.
43 1300. 32.62 6 1.0 1.0 10000.0 3.00 45.
44 1400. 31.07 6 1.0 1.0 10000.0 3.00 45.
45 1500. 29.60 6 1.0 1.0 10000.0 3.00 45.
46 1600. 28.23 6 1.0 1.0 10000.0 3.00 45.
47 1700. 26.93 6 1.0 1.0 10000.0 3.00 45.
48 1800. 25.72 6 1.0 1.0 10000.0 3.00 45.
    
```

49	1900.	24.57	6	1.0	1.0	10000.0	3.00	45.
50	2000.	23.52	6	1.0	1.0	10000.0	3.00	45.
51	2100.	22.56	6	1.0	1.0	10000.0	3.00	45.
52	2200.	21.68	6	1.0	1.0	10000.0	3.00	45.
53	2300.	20.84	6	1.0	1.0	10000.0	3.00	45.
54	2400.	20.05	6	1.0	1.0	10000.0	3.00	44.
55	2500.	19.30	6	1.0	1.0	10000.0	3.00	45.
56	2600.	18.60	6	1.0	1.0	10000.0	3.00	44.
57	2700.	17.93	6	1.0	1.0	10000.0	3.00	45.
58	2800.	17.29	6	1.0	1.0	10000.0	3.00	45.
59	2900.	16.69	6	1.0	1.0	10000.0	3.00	45.
60	3000.	16.13	6	1.0	1.0	10000.0	3.00	44.
61	3500.	13.81	6	1.0	1.0	10000.0	3.00	45.
62	4000.	11.99	6	1.0	1.0	10000.0	3.00	45.
63	4500.	10.52	6	1.0	1.0	10000.0	3.00	42.
64	5000.	9.325	6	1.0	1.0	10000.0	3.00	44.
65	5500.	8.340	6	1.0	1.0	10000.0	3.00	44.
66	6000.	7.516	6	1.0	1.0	10000.0	3.00	41.
67	6500.	6.821	6	1.0	1.0	10000.0	3.00	38.
68	7000.	6.228	6	1.0	1.0	10000.0	3.00	45.
69	7500.	5.735	6	1.0	1.0	10000.0	3.00	45.
70	8000.	5.306	6	1.0	1.0	10000.0	3.00	35.
71	8500.	4.931	6	1.0	1.0	10000.0	3.00	39.
72	9000.	4.598	6	1.0	1.0	10000.0	3.00	43.
73	9500.	4.303	6	1.0	1.0	10000.0	3.00	43.
74	10000.	4.040	6	1.0	1.0	10000.0	3.00	32.

75								
76	MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 20. M:							
77	559.	44.69	6	1.0	1.0	10000.0	3.00	45.

78  
 79 \*\*\*\*\*  
 80 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 81 \*\*\*\*\*

82								
83	CALCULATION	MAX CONC	DIST TO	TERRAIN				
84	PROCEDURE	(UG/M**3)	MAX (M)	HT (M)				
85	-----	-----	-----	-----				
86	SIMPLE TERRAIN	44.69	559.	0.				

```

1  LJMP GRADING AND SITE PREPARATION - PM10
2
3  SIMPLE TERRAIN INPUTS:
4  SOURCE TYPE = AREA
5  EMISSION RATE (G/(S-M**2)) = .541080E-06
6  SOURCE HEIGHT (M) = 3.0000
7  LENGTH OF LARGER SIDE (M) = 230.2000
8  LENGTH OF SMALLER SIDE (M) = 230.2000
9  RECEPTOR HEIGHT (M) = 10.0000
10 URBAN/RURAL OPTION = RURAL
11 THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
12 THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.
13
14 MODEL ESTIMATES DIRECTION TO MAX CONCENTRATION
15
16
17 BUOY. FLUX = .000 M**4/S**3; MOM. FLUX = .000 M**4/S**2.
18
19 *** FULL METEOROLOGY ***
20
21 *****
22 *** SCREEN AUTOMATED DISTANCES ***
23 *****
24
25 *** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***
26
27 DIST CONC U10M USTK MIX HT PLUME MAX DIR
28 (M) (UG/M**3) STAB (M/S) (M/S) (M) HT (M) (DEG)
29 -----
30 20. 3.022 2 1.0 1.0 320.0 3.00 45.
31 100. 4.578 3 1.0 1.0 320.0 3.00 45.
32 200. 6.369 4 1.0 1.0 320.0 3.00 45.
33 300. 7.311 5 1.0 1.0 10000.0 3.00 45.
34 400. 7.422 5 1.0 1.0 10000.0 3.00 45.
35 500. 7.543 6 1.0 1.0 10000.0 3.00 45.
36 600. 7.581 6 1.0 1.0 10000.0 3.00 45.
37 700. 7.386 6 1.0 1.0 10000.0 3.00 45.
38 800. 7.092 6 1.0 1.0 10000.0 3.00 45.
39 900. 6.767 6 1.0 1.0 10000.0 3.00 45.
40 1000. 6.440 6 1.0 1.0 10000.0 3.00 45.
41 1100. 6.127 6 1.0 1.0 10000.0 3.00 45.
42 1200. 5.831 6 1.0 1.0 10000.0 3.00 45.
43 1300. 5.551 6 1.0 1.0 10000.0 3.00 45.
44 1400. 5.286 6 1.0 1.0 10000.0 3.00 45.
45 1500. 5.037 6 1.0 1.0 10000.0 3.00 45.
46 1600. 4.803 6 1.0 1.0 10000.0 3.00 45.
47 1700. 4.583 6 1.0 1.0 10000.0 3.00 45.
48 1800. 4.376 6 1.0 1.0 10000.0 3.00 45.
    
```

49	1900.	4.181	6	1.0	1.0	10000.0	3.00	45.
50	2000.	4.002	6	1.0	1.0	10000.0	3.00	45.
51	2100.	3.839	6	1.0	1.0	10000.0	3.00	45.
52	2200.	3.688	6	1.0	1.0	10000.0	3.00	45.
53	2300.	3.546	6	1.0	1.0	10000.0	3.00	45.
54	2400.	3.412	6	1.0	1.0	10000.0	3.00	44.
55	2500.	3.284	6	1.0	1.0	10000.0	3.00	45.
56	2600.	3.164	6	1.0	1.0	10000.0	3.00	44.
57	2700.	3.050	6	1.0	1.0	10000.0	3.00	45.
58	2800.	2.942	6	1.0	1.0	10000.0	3.00	45.
59	2900.	2.840	6	1.0	1.0	10000.0	3.00	45.
60	3000.	2.744	6	1.0	1.0	10000.0	3.00	44.
61	3500.	2.350	6	1.0	1.0	10000.0	3.00	45.
62	4000.	2.039	6	1.0	1.0	10000.0	3.00	45.
63	4500.	1.790	6	1.0	1.0	10000.0	3.00	42.
64	5000.	1.587	6	1.0	1.0	10000.0	3.00	44.
65	5500.	1.419	6	1.0	1.0	10000.0	3.00	44.
66	6000.	1.279	6	1.0	1.0	10000.0	3.00	41.
67	6500.	1.161	6	1.0	1.0	10000.0	3.00	38.
68	7000.	1.060	6	1.0	1.0	10000.0	3.00	45.
69	7500.	.9759	6	1.0	1.0	10000.0	3.00	45.
70	8000.	.9029	6	1.0	1.0	10000.0	3.00	35.
71	8500.	.8390	6	1.0	1.0	10000.0	3.00	39.
72	9000.	.7824	6	1.0	1.0	10000.0	3.00	43.
73	9500.	.7321	6	1.0	1.0	10000.0	3.00	43.
74	10000.	.6874	6	1.0	1.0	10000.0	3.00	32.

75								
76	MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 20. M:							
77	559.	7.604	6	1.0	1.0	10000.0	3.00	45.

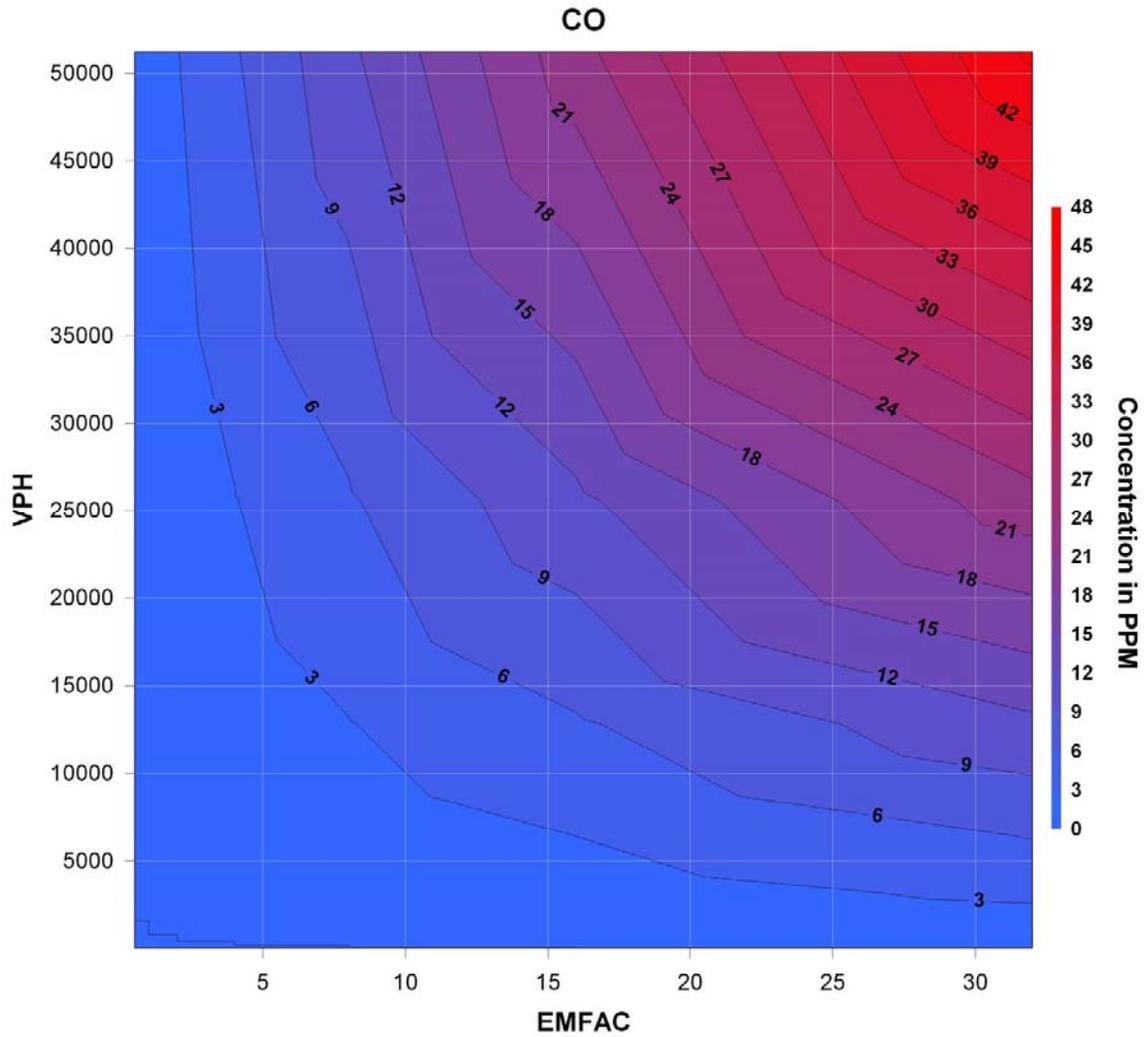
78  
 79 \*\*\*\*\*  
 80 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 81 \*\*\*\*\*

82								
83	CALCULATION	MAX CONC	DIST TO	TERRAIN				
84	PROCEDURE	(UG/M**3)	MAX (M)	HT (M)				
85	-----	-----	-----	-----				
86	SIMPLE TERRAIN	7.604	559.	0.				

EMFAC2011 Emission Rates  
 Region Type: County  
 Region: San Diego  
 Calendar Year: 2020  
 Season: Annual  
 Vehicle Classification: EMFAC2011 Categories

Region	CalYr	Season	Veh_Class	Fuel	MdYr	Speed (miles/hr)	VMT (miles/day)	ROG RUNEX (gms/mile)	TOG RUNEX (gms/mile)	CO RUNEX (gms/mile)	NOX RUNEX (gms/mile)	CO2 R (gms/mile)
San Diego	2020	Annual	LDA	GAS	Aggregated	45	2242464.381	0.025991442	0.025991442	0.7986615	0.08782155	283.23
San Diego	2020	Annual	LDA	DSL	Aggregated	45	9838.147339	0.01573353	0.017911578	0.105103646	0.325845762	297.03
San Diego	2020	Annual	LDT1	GAS	Aggregated	45	322328.281	0.02655532	0.039937004	1.47168894	0.15242977	327.7
San Diego	2020	Annual	LDT1	DSL	Aggregated	45	395.3592352	0.028245423	0.032155538	0.143171582	0.37188977	301.77
San Diego	2020	Annual	LDT2	GAS	Aggregated	45	838126.6583	0.013177188	0.022497407	0.905772897	0.101977931	385.63
San Diego	2020	Annual	LDT2	DSL	Aggregated	45	363.5267772	0.019196041	0.021853415	0.119984215	0.391812714	298.97
San Diego	2020	Annual	LHD1	GAS	Aggregated	45	38808.18589	0.03897162	0.048331048	0.78990108	0.39245016	452.05
San Diego	2020	Annual	LHD1	DSL	Aggregated	45	44121.07623	0.111091742	0.126470564	0.560391725	2.606862687	521.20
San Diego	2020	Annual	LHD2	GAS	Aggregated	45	3218.236203	0.01898113	0.025698977	0.42556526	0.297729368	452.05
San Diego	2020	Annual	LHD2	DSL	Aggregated	45	11310.33045	0.101947139	0.116060039	0.536482048	2.420907045	521.20
San Diego	2020	Annual	MCV	GAS	Aggregated	45	28802.32646	2.03328051	2.217487704	17.789901	1.16787867	138.81
San Diego	2020	Annual	MDV	GAS	Aggregated	45	573432.1342	0.032022119	0.048593337	1.599921091	0.205190013	492.07
San Diego	2020	Annual	MDV	DSL	Aggregated	45	633.2175404	0.019479433	0.022176038	0.115337298	0.319248347	297.56
San Diego	2020	Annual	MH	GAS	Aggregated	45	27371.31064	0.04404313	0.056990031	1.48338751	0.55198233	452.05
San Diego	2020	Annual	MH	DSL	Aggregated	45	3680.803695	0.10878148	0.123840481	0.50298745	5.78100093	1070.0
San Diego	2020	Annual	Motor Coach	DSL	Aggregated	45	7985.095821	0.15703997	0.178778052	0.834478884	3.138282148	1624.5
San Diego	2020	Annual	OBUS	GAS	Aggregated	45	6804.404885	0.072015507	0.08657315	1.536022561	0.850358956	452.05
San Diego	2020	Annual	SBUS	GAS	Aggregated	45	878.6398845	0.442762318	0.489092346	8.484772469	2.231064373	452.05
San Diego	2020	Annual	SBUS	DSL	Aggregated	45	2276.91643	0.072041767	0.082014067	0.632787476	7.748496101	1073.9
San Diego	2020	Annual	T6 Ag	DSL	Aggregated	45	538.4805779	0.142366689	0.162073867	0.627616773	2.910517913	1054.3
San Diego	2020	Annual	T6 Public	DSL	Aggregated	45	3409.904163	0.051741473	0.058903729	0.243540937	2.469711818	1056.0
San Diego	2020	Annual	T6 CAIRP heavy	DSL	Aggregated	45	59.69256382	0.068097095	0.077523359	0.321950143	1.726291417	1050.0
San Diego	2020	Annual	T6 CAIRP small	DSL	Aggregated	45	204.1592338	0.070761999	0.080557149	0.334750841	0.947253444	1045.9
San Diego	2020	Annual	T6 OOS heavy	DSL	Aggregated	45	34.22299142	0.068097095	0.077523359	0.321950143	1.726291415	1050.0
San Diego	2020	Annual	T6 OOS small	DSL	Aggregated	45	117.0487455	0.070761999	0.080557149	0.334750841	0.947253444	1045.9
San Diego	2020	Annual	tate construction	DSL	Aggregated	45	3647.965062	0.071390036	0.081272121	0.337220996	2.978218782	1056.2
San Diego	2020	Annual	tate construction	DSL	Aggregated	45	9928.102112	0.082181974	0.093557921	0.388774838	1.262302074	1047.8
San Diego	2020	Annual	T6 instate heavy	DSL	Aggregated	45	16711.92297	0.071247284	0.08110961	0.33663855	2.682795273	1054.8
San Diego	2020	Annual	T6 instate small	DSL	Aggregated	45	47609.69556	0.079649614	0.090675022	0.376795109	1.189093728	1047.3
San Diego	2020	Annual	T6 utility	DSL	Aggregated	45	399.9860169	0.052862786	0.060180258	0.250018935	1.565358189	1052.4
San Diego	2020	Annual	T6TS	GAS	Aggregated	45	18147.57132	0.077482961	0.091832662	1.62625623	0.763625073	452.05
San Diego	2020	Annual	T7 Ag	DSL	Aggregated	45	2436.24535	0.235106843	0.267651244	1.279313014	5.263193311	1632.2
San Diego	2020	Annual	T7 CAIRP	DSL	Aggregated	45	55275.3491	0.173364836	0.19736267	0.923002748	2.292113748	1617.6
San Diego	2020	Annual	CAIRP construct	DSL	Aggregated	45	4663.871851	0.173347807	0.197343283	0.922887885	2.331678434	1617.8
San Diego	2020	Annual	T7 NNOOS	DSL	Aggregated	45	62182.70159	0.147621371	0.168055694	0.785748024	1.544245477	1615.1
San Diego	2020	Annual	T7 NCOOS	DSL	Aggregated	45	20129.87755	0.173285773	0.197272662	0.922577028	2.296076295	1617.6
San Diego	2020	Annual	T7 other port	DSL	Aggregated	45	13112.69884	0.390150283	0.444156398	2.070463268	6.950142658	1666.4
San Diego	2020	Annual	T7 POAK	DSL	Aggregated	45	0	0	0	0	0	0
San Diego	2020	Annual	T7 POLA	DSL	Aggregated	45	6990.380511	0.385313493	0.438650082	2.044795226	6.820262486	1664.8
San Diego	2020	Annual	T7 Public	DSL	Aggregated	45	2813.335539	0.088506172	0.100757539	0.480395992	7.154561495	1650.0
San Diego	2020	Annual	T7 Single	DSL	Aggregated	45	29620.85184	0.124895788	0.142184347	0.662753026	3.962537945	1630.6
San Diego	2020	Annual	single constructi	DSL	Aggregated	45	12064.82284	0.124768128	0.142039016	0.662019851	4.107216905	1631.5
San Diego	2020	Annual	T7 SWCV	DSL	Aggregated	45	8203.10902	0.093146698	0.106040425	0.498928617	7.400986083	1640.4
San Diego	2020	Annual	T7 tractor	DSL	Aggregated	45	81660.41384	0.170999468	0.194669877	0.908669319	3.823461779	1626.1
San Diego	2020	Annual	tractor construct	DSL	Aggregated	45	8995.217136	0.169711373	0.19320348	0.901537144	4.199918533	1627.9
San Diego	2020	Annual	T7 utility	DSL	Aggregated	45	426.4867188	0.094546059	0.107633491	0.501668244	3.704094409	1632.1
San Diego	2020	Annual	T715	GAS	Aggregated	45	3419.591346	0.437511938	0.525019232	22.53766349	4.8975608	452.05
San Diego	2020	Annual	UBUS	GAS	Aggregated	45	1734.367182	0.298716401	0.326507237	3.613929472	2.201846498	452.05
San Diego	2020	Annual	UBUS	DSL	Aggregated	45	8477.237764	0.346767768	0.394772026	1.302938026	11.32342637	2499.9
San Diego	2020	Annual	All Other Buses	DSL	Aggregated	45	4370.003165	0.077736952	0.088497603	0.367213193	2.680642702	1053.1

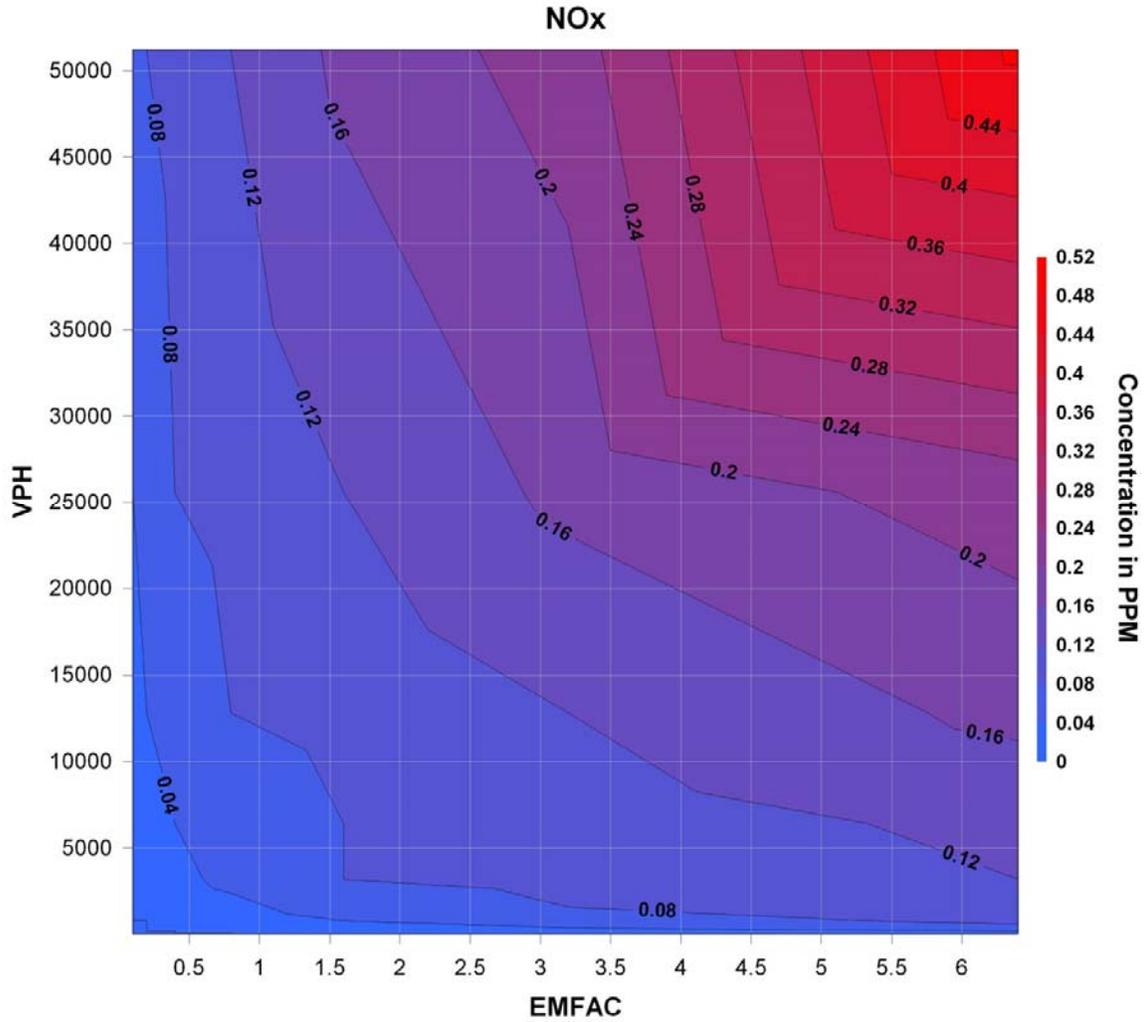
**CALINE4 SOLUTION SPACE RESULTS – SCENARIO CO**



Rank 1 Eqn 151232682  $\ln z = a + b \ln x + c (\ln y)^2$

$r^2$	Coef Det	DF Adj	$r^2$	Fit Std Err	F-value
0.9997614637	0.9997516609	0.102880788	155075.68815		

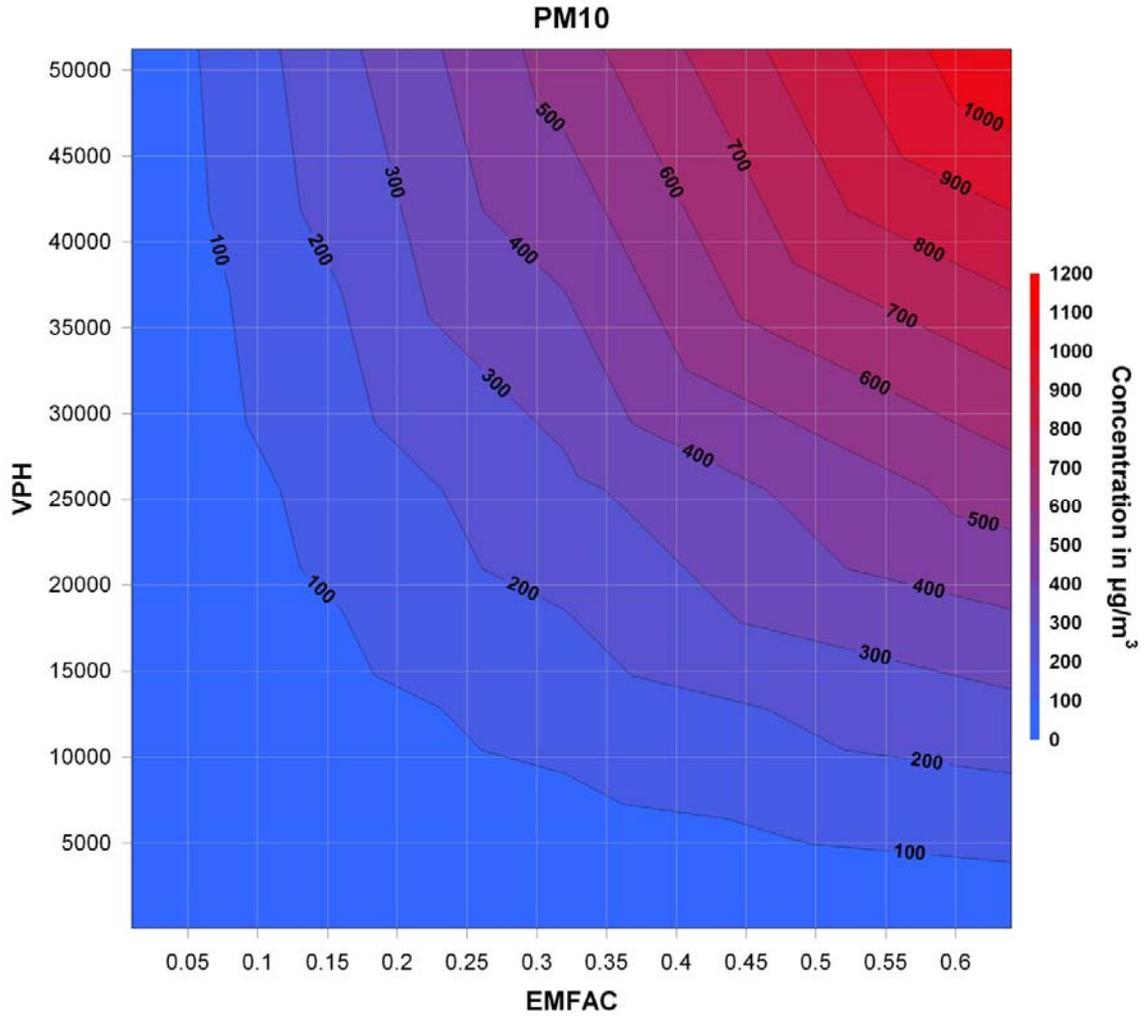
**CALINE4 SOLUTION SPACE RESULTS – SCENARIO NO<sub>x</sub>**



Rank 1 Eqn 151232653  $\ln z = a + bx^{0.5} + c(\ln y)^2$

$r^2$ Coef Det	DF Adj $r^2$	Fit Std Err	F-value
0.9311638335	0.9283349499	0.0194986151	500.50814223

**CALINE4 SOLUTION SPACE RESULTS – SCENARIO PM<sub>10</sub>**



Rank 1 Eqn 151232682  $\ln z = a + b \ln x + c (\ln y)^2$

$r^2$	Coef Det	DF Adj	$r^2$	Fit Std Err	F-value
0.9998	185376	0.9998	110803	2.1625247335	203862.00724



## INDEX OF IMPORTANT TERMS

- atomic mass, 25
- CAAQS, 9, 11, 37, 38, 42
- California Air Resources Board, 8, 14
- California Ambient Air Quality Standards, 9
- California Environmental Quality Act, 9
- CALINE4, 22, 61, 63, 64
- cancer, 13, 20, 21, 37
- CARB, 8, 10, 14, 20, 21, 25, 26, 49
- Carbon Monoxide, 7, 12, 13
- CEIDARS, 19, 38
- CEQA, 9, 11, 12, 14, 19, 21, 33, 39, 40
- Clean Air Act, 8, 12
- CO, 7, 11, 12, 18, 22, 25, 30, 37, 38, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 53, 61
- control efficiency, 34
- de minimis*, 12
- EMFAC 2007*, 22
- Environmental Protection Agency, 7
- EPA, 7, 8, 10, 12, 18, 20, 22, 29
- hydrocarbons, 8
- Hydrogen Sulfide, 7, 8, 13
- ISE, 1, 3, 16, 17, 19, 24, 39, 52
- mass spectrometer, 15
- Motor Vehicle Emission Inventory*, 21
- MVEI, 21
- NAAQS, 8, 39, 42
- National Ambient Air Quality Standards, 8
- National Institute of Standards and Technology, 18
- Nitrogen Dioxide, 7, 13
- NO<sub>2</sub>, 7
- O<sub>3</sub>, 7, 25
- odor, 8, 41
- Ozone, 7, 25
- PAH, 13
- particulate matter, 7, 25
- PM<sub>10</sub>, 7, 12, 18, 19, 20, 25, 30, 33, 34, 35, 37, 38, 39, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 53, 64
- PM<sub>2.5</sub>, 25
- polynuclear aromatic hydrocarbons*, 13
- Radiation inversion, 23
- Reactive Organic Gasses, 7, 8
- Reference Exposure Levels, 13
- REL, 13
- risk, 8, 13, 14, 20, 21, 37, 38
- ROG, 7, 8, 12, 18, 30, 42, 49, 50, 51
- San Diego Air Pollution Control District, 9
- San Diego Monitoring Station, 26, 27, 28
- SCAQMD, 12, 13, 14, 19, 21, 22, 33, 34, 39, 40
- SCREEN3*, 20, 37, 38, 53
- SDAPCD, 9, 11, 12, 15, 34
- SO<sub>2</sub>, 7, 8
- Spectral deconvolution, 25
- Standard Temperature and Pressure*, 15
- STP, 15, 38
- Subsidence inversions, 23
- Sulfur Dioxide, 7, 13
- T-BACT, 14, 38
- Tedlar, 15
- Toxic Best Available Control Technologies*, 14
- UGA, 15, 18
- Universal Gas Analyzer, 15
- VOC, 7, 8, 12, 21, 39, 40, 51
- Volatile Organic Compounds, 7, 8