

From: noreply@granicusideas.com
To: [Jimenez, Ann](#); [Flannery, Kathleen](#); [Slovick, Mark](#); [Neufeld, Darin](#); [Barnhart, Douglas](#); [Seiler, Michael](#); [Pallinger, David](#); [Woods, Bryan](#); [Beck, Michael](#); [Calvo, Yolanda](#); [Edwards, Michael \(LUEG\)](#)
Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 2:49:33 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Andrew McPartland submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: As someone who travels this road frequently I think this would be a great value to the traffic going northbound.

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Subject: New eComment for Planning Commission Hearing
Date: Monday, July 27, 2020 8:41:58 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Anthony Burman submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project, there is nothing on the northbound side of the freeway

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 10:45:51 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Bryan Jones submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project, there is a need for a project on the northbound side of the freeway here

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 11:13:52 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Clyde Chavez submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 11:10:11 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Dawn Caughron submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project there is a definite need

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 4:30:05 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Deborah Muro submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 8:44:29 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Don Green submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 11:08:58 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Erin Lee submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: We need this project on the northbound side of the freeway

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 9:45:12 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

JAMES HARRIS submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project, there is nothing on the northbound side of the freeway.

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 9:10:02 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Jenny Fleming submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: Definitely support this project! Need a gas station on the northbound side of the freeway.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 3:53:33 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

JEREMY KOVACEVICH submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project. Long stretch with no amenities NOBO.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 7:00:13 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Jill Smith submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I completely support this gas station. We need a gas station on the north bound side and we need other options other than Arco. Thank you!

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 11:12:36 AM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Karen Lee submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project. There is a need for a project like this on the northbound side of the freeway.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 2:10:14 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Ken Assi submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project. It would be a great amenity to have off the freeway in an area that is lacking these amenities, especially for credit card users since Arco only accepts cash. There are no other gas stations northbound on I15 for miles which makes it dangerous for travelers. In addition it would allow the hundreds of homes east of the project to have access to basic goods that a convenience store would carry which would avoid long trips to a grocery store miles away for small items.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 4:51:46 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Marc Toma submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: Yes I would love it!

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 1:24:21 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Matthew Arsulich submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 3:02:35 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Melissa Gutierrez submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: 100% support!!

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 1:49:28 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Spencer Scribner submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: There needs to be something on Northbound. Not another Arco.

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Subject: New eComment for Planning Commission Hearing
Date: Friday, July 24, 2020 12:06:00 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Spencer Sigoda submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 3:06:23 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Tony Casarez submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: As a daily weekday traveler of the 15N freeway, I support this project. Existing Arco station only accepts cash and charges me to use my debit card. There are no other gas stations within 10-15 miles which makes it dangerous during nighttime hours. During the mid afternoons, traffic for that only gas station is bad and attempting to go back onto the 15N takes time. Competition in the form of a better quality fuel is welcomed in that area for those who live on the east side of the freeway.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 8:47:26 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Will Smith submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I fully support this project, we greatly need an alternative gas station on the north side of the freeway.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 1:22:22 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

A G submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 1:35:09 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Christopher Shamoon submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: We need something on the northbound side of the freeway! I fully support and encourage this project.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 1:46:45 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

debby mccaslin submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project.

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 2:22:39 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Evan Knudson submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 1:33:37 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Kevin Smith submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I wholeheartedly support this project. There is nothing on the north side of the freeway and it would be nice to have an option other than Arco. Thank you

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Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 12:47:37 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Russel Bridglal submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I am in support of the new station on that off ramp. We need competition in the area.

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From: noreply@granicusideas.com
To: [Jimenez, Ann](#); [Flannery, Kathleen](#); [Slovick, Mark](#); [Neufeld, Darin](#); [Barnhart, Douglas](#); [Seiler, Michael](#); [Pallinger, David](#); [Woods, Bryan](#); [Beck, Michael](#); [Calvo, Yolanda](#); [Edwards, Michael \(LUEG\)](#)
Subject: New eComment for Planning Commission Hearing
Date: Thursday, July 23, 2020 1:35:09 PM

[SpeakUp](#)

New eComment for Planning Commission Hearing

Sean Wischmeyer submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 5. KA Gas Station and Convenience Store Appeal; PDS2017-STP-17-028; PDS2017-BC-17-0069; PDS2017-ER-17-08-008. To speak on this Item call (619) 343-2539 use conference ID 436 935 549#

eComment: I support this project.

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The Law Office of
Julie M. Hamilton

July 30, 2020

Douglas Barnhart
Chairperson
Planning Commission
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, CA 92123

VIA EMAIL

RE: KA Shell Gas Station and Convenience Store, PDS2017-STP-028, PDS2017-BC-17-0069, PDS2017-ER-17-08-008.

Dear Chairperson Barnhart:

On behalf of Mesa Rock Road, LLC; I urge the Planning Commission to deny the Site Plan and Boundary Adjustment for the KA Shell Gas Station and Convenience Store. I apologize for the tardiness of my letter, as I explained to planning staff several weeks ago, my litigation schedule prevented me from providing more timely comments.

My client alleges the findings for approval of the Site Plan and Boundary Adjustment cannot be made for this project. Most significantly, the project is not consistent with the vision, goals and policies of the Climate Action Plan, which implements the County's general plan. (CAP Executive Summary, p. ES-1.) As the attached letter from RK Engineering states, the project is inconsistent with the following CAP strategies for reducing GHG through the built environment and transportation: (See Attachment A.)

- T-1: Reduced Vehicle Miles Traveled:
 - Project is not located in a County village that would support mixed-use and a transit-oriented development.
- T-2: Shift Towards Alternative Modes of Transportation:
 - Project does not improve roadways with multi-modal facilities.
 - Project would not reduce emissions through the reduction of VMT (project would generate more VMT than the existing patio furniture store land use).
 - Project does not include shared parking and/or reduced parking.
- T-3: Decarbonize On-Road and Off-Road Vehicle Fleet:
 - Project does not promote alternative fuel vehicles or include electric

vehicle charging.

- T-4: Invest in Local Projects to Offset Carbon Emissions:
 - Project does not include on-site carbon sequestration features or investment into local carbon projects.

RK Engineering also points out the obvious inconsistencies with the CAP as follows:

The County's CAP identified fossil fuel-based transportation as the largest emission sector in the County's GHG inventory, and it also recognizes that reducing single-occupancy vehicle trips will be a key strategy for achieving its reduction goals.

A gasoline service station project, which encourages the continued use of fossil fuels, is inherently not consistent with the County's CAP, nor is it consistent with the broader State and Global initiatives to combat climate change.

Although the Planning Commission is not authorized to act on the categorical exemption approved for the project, the Planning Commission must be aware of the potential environmental impacts of the project before it approves the project. As RK Engineering demonstrates, the project would exceed CAPCOA Screening Thresholds and cause a potentially significant impact on GHG. The applicant has failed to acknowledge the inconsistencies with the CAP and failed to provide the on-site offsets necessary to reduce GHG or comply with the CAP.

The initiatives in the CAP cannot be achieved if the County approves projects that do not meet the directives included to implement the general plan and reduce GHG. The applicant's consideration of GHG was flawed for several reasons as outlined in the RK Engineering letter. The GHG and CAP studies prepared for the project estimate GHG emissions at 541 Metric Tons (MT). The CAPCOA threshold is 855 MT. Based on RK's analysis, the CO₂e emissions would be approximately 2,056 metric tons; exceeding the CAPCOA threshold by 1,515 MT. This is without factoring in the construction amortization emissions and area/energy emissions.

Contrary to the staff report, the project exceeds the thresholds established in the CAP and the CAPCOA thresholds. Therefore, the project cannot rely on the General Plan EIR to analyze the impacts of this use at this location. The project does not implement the mitigation measures necessary to comply with the CAP as discussed above. The staff report states: "The Project...identified applicable mitigation measures necessary to reduce project-specific impacts, and the Project implements these mitigation measures. The concept of the categorical exemptions is to exempt categories of projects the Secretary of Resources has determined would not have significant impacts. If a project incorporates mitigation measures, it cannot be considered exempt from CEQA. The CEQA analysis included in the staff report is inaccurate and demonstrates the Project does not qualify for a categorical exemption."

As mentioned in my letter of comment dated January 17, 2020; the proposed septic system remains questionable. In January, the approved septic plans showed the septic tank in a location behind the convenience store. However, the site plan showed the convenience store

extending over the area proposed for the septic tank. The applicant submitted a revised layout for the septic system where the 8,000-gallon tank is now located under the parking lot in front of the convenience store. (See Attachment B.) The file does not show that environmental health has approved this system. This site is substantially smaller than the site across the freeway, and the revisions help to demonstrate the difficulty with providing septic for this site. The revised wastewater layout does not provide details as to tank construction that would allow parking over the tank. Placing a septic tank under a parking lot is unusual at best, the applicant must demonstrate the septic tank can sustain the continued weight of vehicles without failure.

A primary component of the CAP is to reduce vehicle miles traveled (VMT). VMT is a tool designed to analyze traffic based on statewide goals related to GHG emissions rather than congestion management. The theory is to focus on infill development – thus minimizing the VMT from a project. This Traffic Impact Analysis, CAP Checklist and Memo and CalEEMod Air Quality Reports prepared by the applicant and relied upon by staff underestimate the potential VMT generated by the project. As RK Engineering shows, the applicant estimates the project will generate 1,100,238 VMT annually.¹ Relying on accepted SANDAG standards for trip generation and pass-by trips, RK estimates the project would generate 4,935,651 VMT – nearly four times the VMT estimated by the applicant.

The increased VMT and the lack of available sanitary sewer lead to one conclusion, this is an inappropriate project in this location. The County must maintain its commitment to a sustainable growth model that focuses development near infrastructure and services. It is clear this project is not consistent with this primary goal of General Plan 2020. This gas station generates excessive VMT, more than four times the VMT estimated by the applicant. And, the project is remote from needed infrastructure; in direct contravention of the stated sustainable growth model described in the general plan.

The Planning Commission must resist the temptation to compare this gas station/convenience store to the Arco gas station/convenience store located across Interstate 15 on Mesa Rock Road. That station is not before the Planning Commission now. That station was built decades ago under a different set of policies, ordinances and environmental concerns. The Planning Commission must recognize policies change to address current conditions, the Commission should not allow projects to proceed because the other guy got something approved decades ago. Basing your decision on approvals from decades past would thwart forward progress developing better communities in a sustainable manner.

Thank you for your time and consideration of these issues, I remain available if you have any questions or would like additional information.

Regards,



Julie M. Hamilton

¹ The Supplemental Traffic Impact Report provided updated traffic counts for the surrounding streets but did not change the anticipated trip generations rates or VMT. The supplemental report related to congestion management only.

Attorney for Mesa Rock, LLC

ATTACHMENTS:

- A. Letter Report from RK Engineering dated July 27, 2020.
- B. Revised Onsite Wastewater Treatment System dated February 25, 2020

ATTACHMENT A

July 27, 2020

Mr. Samir Salem
MESA ROCK ROAD, LLC.
3278 Vista Matamo
El Cajon, CA 92109

Subject: KA Shell Gas Station and Convenience Store Climate Action Plan and Greenhouse Gas Impact Peer Review, County of San Diego

Dear Mr. Salem:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of potential environmental impacts associated with greenhouse gas (GHG) emissions and global climate change from the KA Shell Gas Station and Convenience Store (hereinafter referred to as project). The project is located near the southeast corner of Centre City Parkway and Deer Springs Road, in unincorporated County of San Diego.

Based on the Site Plan for the KA Enterprises Mega Mart Deer Springs Road and Centre Site Pkwy, Escondido, CA, prepared by Mega Engineering Consultants, dated 10/17/2019, the project consists of a 16 vehicle fueling station gasoline service station with a 3,500 square foot convenience market and 19 parking spaces.

The purpose of this letter is to review the GHG emissions impacts from the project and provide comments to help ensure that all potential impacts are adequately identified and the effects mitigated to a point where clearly no significant impact on the environment would occur.

RK has over 30 years of combined experience in environmental planning, air quality and greenhouse gas and has prepared hundreds of air/GHG impact analyses for public agencies and developers in the State of California. We are fully aware of the technical requirements for analyzing GHG impacts in the State of California and County of San Diego.

This review is based on information provided in the following documents:

- PDS2017-STP-17-028 (Mega Mart, KA Enterprises) - San Diego Climate Action Plan Consistency Review Checklist (Dated August 2019) and Greenhouse Gas Memo (hereinafter referred to as GHG Memo)
- Appendix A1: CalEEMod Air Quality Reports – Proposed Project (Annual, Summer, Winter)
- KA Enterprises Mega Mart (PDS2017-STP-17-028) Traffic Impact Study, dated October 15, 2019 (hereinafter referred to as Traffic Study)

Based on this review, RK has identified several inconsistencies in the analysis, and as a result, not all potential project impacts have been fully disclosed. The following comments are provided to help ensure all potential impacts are adequately addressed:

Comments on the GHG Memo

1. Mobile Source Emissions: The GHG Memo has incorrectly calculated and underestimated the project's GHG emissions from mobile sources. Upon review of CalEEMod annual emissions report, the analysis has underestimated the project trip generation and overestimated the amount of pass-by trips that this project will generate; resulting in under-reporting of the project's GHG emissions.

As shown in the CalEEMod Annual Report, Table 4.2, Trip Summary Information, the project is estimated to generate a total of 1,812 trips per day. However, per the Traffic Study, and based on the County recognized standard San Diego Association of Governments (SANDAG) Trip Generation Rates, a 16 vehicle fueling station gas station with food mart is expected to generate 2,560 trips per day. Thus, the GHG emissions analysis has underestimated project trips by 748 trips per day.

Furthermore, as shown in the CalEEMod Annual Report, Table 4.3, Trip Type Information, the analysis has over-estimated pass-by trips. Table 4.3 shows pass-by trip reduction of up to 86% (pass-by plus diverted trips), however, per the Traffic Study, the project is only expected to generate 28% pass-by trips. Per SANDAG, pass-by trips typically include diverted trips up to 1 mile.

Therefore, by overestimating the amount of pass-by trips the project would generate, GHG emissions from mobile sources are under-reported.

2. Vehicle Miles Traveled. By underestimating trip generation, the GHG Memo and CalEEMod analysis have also significantly underestimated the potential VMT generated by the project, as the two measures are directly correlated. As shown in Table 4.2 of the project's CalEEMod annual emissions report, the project was estimated to generate 1,100,238 VMT annually.

RK has performed a supplemental CalEEMod emissions analysis using the trip generation and pass-by assumptions from the Traffic Study (as discussed in comments 1) to check the findings of the GHG Memo. The RK supplemental CalEEMod annual emissions report is provided in Attachment A.

As shown in Table 4.2 of the RK supplemental CalEEMod annual emissions report, the project would actually generate 4,935,651 VMT. Thus, the GHG Memo has under-reported project VMT by over 3 million VMT per year, and as a result, project GHG emissions are also under-reported.

3. Table 2, Combined Annual Emissions MT of CO₂e/year. The findings presented in Table 2 of the GHG Memo are not accurate and under-report GHG emissions. Annual GHG emissions are reported to be approximately 541 Metric Tons (MT). However, based on the analysis provided by RK, the annual CO₂e emissions from mobile sources would be approximately 2,056 metric tons. Thus, mobile source emissions have been under-reported by approximately 1,515 MT per year.
4. Threshold of Significance. The GHG Memo concludes that the project would not exceed the adjusted CAPCOA Screening Threshold of 855 MT of CO₂e per year. However, based on the results of the supplemental emissions analysis provided by RK, mobile source GHG emissions alone would be 2,056 MT annually. Thus, the project would exceed the CAPCOA Screening Thresholds, even without factoring in construction amortization emissions and area/energy emissions. As a result, a potentially significant impact to GHG would occur and additional mitigation measures are required.

5. CAP Consistency. The GHG Memo concludes that the project would comply with the County's CAP, however, the project would not meet the CAPCOA screening thresholds of significance and the project is in direct conflict with all four of CAP's GHG Reduction Strategies for the Built Environment and Transportation.

The following list highlights the project inconsistencies with the strategies for reducing GHG through the built environment and transportation:

- T-1: Reduced Vehicle Miles Traveled
 - Project is not located in a County village that would support mixed-use and a transit oriented development
- T-2: Shift Towards Alternative Modes of Transportation:
 - Project does not improve roadways with multi-modal facilities
 - Project would not reduce emissions through the reduction of VMT (project would generate more VMT than the existing patio furniture store land use)
 - Project does not include shared parking and/or reduced parking
- T-3: Decarbonize On-Road and Off-Road Vehicle Fleet
 - Project does not promote alternative fuel vehicles or include electric vehicle charging
- T-4: Invest in Local Projects to Offset Carbon Emissions
 - Project does not include on-site carbon sequestration features or investment into local carbon sequestration projects

The County's CAP identified fossil fuel-based transportation as the largest emission sector in the County's GHG inventory, and it also recognizes that reducing single-occupancy vehicle trips will be a key strategy for achieving its reduction goals.

A gasoline service station project, which encourages the continued use of fossil fuels, is inherently not consistent with the County's CAP, nor is it consistent with the broader State and Global initiatives to combat climate change. Yet the GHG Memo fails to acknowledge any of the inconsistencies highlighted above. Therefore, the analysis should be updated to disclose all potential inconsistencies that may result in a potentially significant impact under CEQA.

Mr. Samir Salem

MESA ROCK ROAD, LLC.

RK 16077

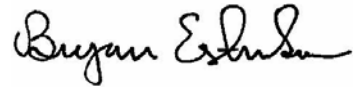
Conclusions

Based on this review of the GHG emissions analysis and CAP consistency analysis for the KA Shell Gas Station and Convenience Store project, the project does not adequately address all potential impacts related to GHG and Global Climate Change. Additional analysis and mitigation measures should be provided to ensure the project does not cause adverse environmental effects.

If you have any questions regarding this study, or would like further review, please do not hesitate to contact us at (949) 474-0809.

Sincerely,

RK ENGINEERING GROUP, INC.



Bryan Estrada, AICP, PTP
Senior Associate

rk16077.doc

JN:2918-2020-01

Attachment A

RK Supplemental GHG Emissions Analysis
CalEEMod Annual Report

KA SHELL GAS STATION GHG REVIEW - San Diego County, Annual

KA SHELL GAS STATION GHG REVIEW

San Diego County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Convenience Market With Gas Pumps	16.00	Pump	0.05	3,500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.6	Precipitation Freq (Days)	40
Climate Zone	13			Operational Year	2021
Utility Company	San Diego Gas & Electric				
CO2 Intensity (lb/MW hr)	720.49	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - 16-vehicle fueling positions with 3,500 SF convenience market.

Vehicle Trips - SANDAG Trip Generation Rate: Gasoline w/Food Mart = 160 daily trips/vehicle fueling space

Traffic Study Pass-By Rate = 28%. Per SANDAG, pass-by includes diverted trips up to 1 mile.

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Table Name	Column Name	Default Value	New Value
tblLandUse	LandUseSquareFeet	2,258.80	3,500.00
tblVehicleTrips	DV_TP	21.00	0.00
tblVehicleTrips	PB_TP	65.00	28.00
tblVehicleTrips	PR_TP	14.00	72.00
tblVehicleTrips	ST_TR	204.47	160.00
tblVehicleTrips	SU_TR	166.88	160.00
tblVehicleTrips	WD_TR	542.60	160.00

2.0 Emissions Summary

2.1 Overall Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0925	0.5225	0.4453	7.1000e-004	2.6100e-003	0.0304	0.0330	8.7000e-004	0.0281	0.0290	0.0000	62.1503	62.1503	0.0184	0.0000	62.6095
Maximum	0.0925	0.5225	0.4453	7.1000e-004	2.6100e-003	0.0304	0.0330	8.7000e-004	0.0281	0.0290	0.0000	62.1503	62.1503	0.0184	0.0000	62.6095

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0925	0.5225	0.4452	7.1000e-004	2.6100e-003	0.0304	0.0330	8.7000e-004	0.0281	0.0290	0.0000	62.1502	62.1502	0.0184	0.0000	62.6094
Maximum	0.0925	0.5225	0.4452	7.1000e-004	2.6100e-003	0.0304	0.0330	8.7000e-004	0.0281	0.0290	0.0000	62.1502	62.1502	0.0184	0.0000	62.6094

[illegible]

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2020	3-31-2020	0.3136	0.3136
2	4-1-2020	6-30-2020	0.2975	0.2975
		Highest	0.3136	0.3136

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0177	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Energy	4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	14.7830	14.7830	5.9000e-004	1.3000e-004	14.8356
Mobile	0.6726	2.8005	7.0980	0.0223	1.8601	0.0194	1.8795	0.4981	0.0181	0.5162	0.0000	2,053.4758	2,053.4758	0.1161	0.0000	2,056.3791
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0531	1.0843	1.1374	5.5000e-003	1.4000e-004	1.3159
Total	0.6904	2.8009	7.0985	0.0223	1.8601	0.0194	1.8795	0.4981	0.0181	0.5163	0.0531	2,069.3434	2,069.3965	0.1222	2.7000e-004	2,072.5308

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2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0177	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Energy	4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	14.7830	14.7830	5.9000e-004	1.3000e-004	14.8356
Mobile	0.6726	2.8005	7.0980	0.0223	1.8601	0.0194	1.8795	0.4981	0.0181	0.5162	0.0000	2,053.4758	2,053.4758	0.1161	0.0000	2,056.3791
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0531	1.0843	1.1374	5.5000e-003	1.4000e-004	1.3159
Total	0.6904	2.8009	7.0985	0.0223	1.8601	0.0194	1.8795	0.4981	0.0181	0.5163	0.0531	2,069.3434	2,069.3965	0.1222	2.7000e-004	2,072.5308

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2020	1/14/2020	5	10	
2	Site Preparation	Site Preparation	1/15/2020	1/15/2020	5	1	
3	Grading	Grading	1/16/2020	1/17/2020	5	2	
4	Building Construction	Building Construction	1/18/2020	6/5/2020	5	100	
5	Paving	Paving	6/6/2020	6/12/2020	5	5	
6	Architectural Coating	Architectural Coating	6/13/2020	6/19/2020	5	5	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 5,250; Non-Residential Outdoor: 1,750; Striped Parking Area: 0
(Architectural Coating – sqft)

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	1.00	1.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

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3.1 Mitigation Measures Construction**3.2 Demolition - 2020****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	4.3400e-003	0.0394	0.0381	6.0000e-005		2.3400e-003	2.3400e-003		2.2300e-003	2.2300e-003	0.0000	5.2038	5.2038	9.8000e-004	0.0000	5.2284
Total	4.3400e-003	0.0394	0.0381	6.0000e-005		2.3400e-003	2.3400e-003		2.2300e-003	2.2300e-003	0.0000	5.2038	5.2038	9.8000e-004	0.0000	5.2284

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3.2 Demolition - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8000e-004	1.4000e-004	1.3400e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3624	0.3624	1.0000e-005	0.0000	0.3627
Total	1.8000e-004	1.4000e-004	1.3400e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3624	0.3624	1.0000e-005	0.0000	0.3627

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	4.3400e-003	0.0394	0.0381	6.0000e-005		2.3400e-003	2.3400e-003		2.2300e-003	2.2300e-003	0.0000	5.2038	5.2038	9.8000e-004	0.0000	5.2284
Total	4.3400e-003	0.0394	0.0381	6.0000e-005		2.3400e-003	2.3400e-003		2.2300e-003	2.2300e-003	0.0000	5.2038	5.2038	9.8000e-004	0.0000	5.2284

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3.2 Demolition - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.8000e-004	1.4000e-004	1.3400e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3624	0.3624	1.0000e-005	0.0000	0.3627
Total	1.8000e-004	1.4000e-004	1.3400e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3624	0.3624	1.0000e-005	0.0000	0.3627

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.4000e-004	4.2200e-003	2.0500e-003	0.0000		1.7000e-004	1.7000e-004		1.5000e-004	1.5000e-004	0.0000	0.4280	0.4280	1.4000e-004	0.0000	0.4314
Total	3.4000e-004	4.2200e-003	2.0500e-003	0.0000	2.7000e-004	1.7000e-004	4.4000e-004	3.0000e-005	1.5000e-004	1.8000e-004	0.0000	0.4280	0.4280	1.4000e-004	0.0000	0.4314

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3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	7.0000e-005	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0181	0.0181	0.0000	0.0000	0.0181
Total	1.0000e-005	1.0000e-005	7.0000e-005	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0181	0.0181	0.0000	0.0000	0.0181

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.4000e-004	4.2200e-003	2.0500e-003	0.0000		1.7000e-004	1.7000e-004		1.5000e-004	1.5000e-004	0.0000	0.4280	0.4280	1.4000e-004	0.0000	0.4314
Total	3.4000e-004	4.2200e-003	2.0500e-003	0.0000	2.7000e-004	1.7000e-004	4.4000e-004	3.0000e-005	1.5000e-004	1.8000e-004	0.0000	0.4280	0.4280	1.4000e-004	0.0000	0.4314

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3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	7.0000e-005	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0181	0.0181	0.0000	0.0000	0.0181
Total	1.0000e-005	1.0000e-005	7.0000e-005	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0181	0.0181	0.0000	0.0000	0.0181

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.5000e-004	0.0000	7.5000e-004	4.1000e-004	0.0000	4.1000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.7000e-004	7.8700e-003	7.6200e-003	1.0000e-005		4.7000e-004	4.7000e-004		4.5000e-004	4.5000e-004	0.0000	1.0408	1.0408	2.0000e-004	0.0000	1.0457
Total	8.7000e-004	7.8700e-003	7.6200e-003	1.0000e-005	7.5000e-004	4.7000e-004	1.2200e-003	4.1000e-004	4.5000e-004	8.6000e-004	0.0000	1.0408	1.0408	2.0000e-004	0.0000	1.0457

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3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	3.0000e-005	2.7000e-004	0.0000	8.0000e-005	0.0000	8.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0725	0.0725	0.0000	0.0000	0.0725
Total	4.0000e-005	3.0000e-005	2.7000e-004	0.0000	8.0000e-005	0.0000	8.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0725	0.0725	0.0000	0.0000	0.0725

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.5000e-004	0.0000	7.5000e-004	4.1000e-004	0.0000	4.1000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	8.7000e-004	7.8700e-003	7.6200e-003	1.0000e-005		4.7000e-004	4.7000e-004		4.5000e-004	4.5000e-004	0.0000	1.0408	1.0408	2.0000e-004	0.0000	1.0457
Total	8.7000e-004	7.8700e-003	7.6200e-003	1.0000e-005	7.5000e-004	4.7000e-004	1.2200e-003	4.1000e-004	4.5000e-004	8.6000e-004	0.0000	1.0408	1.0408	2.0000e-004	0.0000	1.0457

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3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.0000e-005	3.0000e-005	2.7000e-004	0.0000	8.0000e-005	0.0000	8.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0725	0.0725	0.0000	0.0000	0.0725
Total	4.0000e-005	3.0000e-005	2.7000e-004	0.0000	8.0000e-005	0.0000	8.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0725	0.0725	0.0000	0.0000	0.0725

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0431	0.4426	0.3694	5.7000e-004		0.0261	0.0261		0.0240	0.0240	0.0000	50.0302	50.0302	0.0162	0.0000	50.4348
Total	0.0431	0.4426	0.3694	5.7000e-004		0.0261	0.0261		0.0240	0.0240	0.0000	50.0302	50.0302	0.0162	0.0000	50.4348

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3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.9000e-004	5.7000e-003	1.5100e-003	1.0000e-005	3.3000e-004	3.0000e-005	3.6000e-004	1.0000e-004	3.0000e-005	1.2000e-004	0.0000	1.3193	1.3193	1.0000e-004	0.0000	1.3218
Worker	1.8000e-004	1.4000e-004	1.3400e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3624	0.3624	1.0000e-005	0.0000	0.3627
Total	3.7000e-004	5.8400e-003	2.8500e-003	1.0000e-005	7.3000e-004	3.0000e-005	7.6000e-004	2.1000e-004	3.0000e-005	2.3000e-004	0.0000	1.6818	1.6818	1.1000e-004	0.0000	1.6846

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0431	0.4426	0.3694	5.7000e-004		0.0261	0.0261		0.0240	0.0240	0.0000	50.0302	50.0302	0.0162	0.0000	50.4347
Total	0.0431	0.4426	0.3694	5.7000e-004		0.0261	0.0261		0.0240	0.0240	0.0000	50.0302	50.0302	0.0162	0.0000	50.4347

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3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.9000e-004	5.7000e-003	1.5100e-003	1.0000e-005	3.3000e-004	3.0000e-005	3.6000e-004	1.0000e-004	3.0000e-005	1.2000e-004	0.0000	1.3193	1.3193	1.0000e-004	0.0000	1.3218
Worker	1.8000e-004	1.4000e-004	1.3400e-003	0.0000	4.0000e-004	0.0000	4.0000e-004	1.1000e-004	0.0000	1.1000e-004	0.0000	0.3624	0.3624	1.0000e-005	0.0000	0.3627
Total	3.7000e-004	5.8400e-003	2.8500e-003	1.0000e-005	7.3000e-004	3.0000e-005	7.6000e-004	2.1000e-004	3.0000e-005	2.3000e-004	0.0000	1.6818	1.6818	1.1000e-004	0.0000	1.6846

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.9300e-003	0.0181	0.0178	3.0000e-005		9.9000e-004	9.9000e-004		9.2000e-004	9.2000e-004	0.0000	2.3482	2.3482	6.8000e-004	0.0000	2.3653
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.9300e-003	0.0181	0.0178	3.0000e-005		9.9000e-004	9.9000e-004		9.2000e-004	9.2000e-004	0.0000	2.3482	2.3482	6.8000e-004	0.0000	2.3653

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3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7000e-004	1.2000e-004	1.2000e-003	0.0000	3.6000e-004	0.0000	3.6000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3262	0.3262	1.0000e-005	0.0000	0.3264
Total	1.7000e-004	1.2000e-004	1.2000e-003	0.0000	3.6000e-004	0.0000	3.6000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3262	0.3262	1.0000e-005	0.0000	0.3264

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	1.9300e-003	0.0181	0.0178	3.0000e-005		9.9000e-004	9.9000e-004		9.2000e-004	9.2000e-004	0.0000	2.3482	2.3482	6.8000e-004	0.0000	2.3653
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.9300e-003	0.0181	0.0178	3.0000e-005		9.9000e-004	9.9000e-004		9.2000e-004	9.2000e-004	0.0000	2.3482	2.3482	6.8000e-004	0.0000	2.3653

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3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.7000e-004	1.2000e-004	1.2000e-003	0.0000	3.6000e-004	0.0000	3.6000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3262	0.3262	1.0000e-005	0.0000	0.3264
Total	1.7000e-004	1.2000e-004	1.2000e-003	0.0000	3.6000e-004	0.0000	3.6000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3262	0.3262	1.0000e-005	0.0000	0.3264

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0406					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.1000e-004	4.2100e-003	4.5800e-003	1.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396
Total	0.0412	4.2100e-003	4.5800e-003	1.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396

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3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0406					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.1000e-004	4.2100e-003	4.5800e-003	1.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396
Total	0.0412	4.2100e-003	4.5800e-003	1.0000e-005		2.8000e-004	2.8000e-004		2.8000e-004	2.8000e-004	0.0000	0.6383	0.6383	5.0000e-005	0.0000	0.6396

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3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.6726	2.8005	7.0980	0.0223	1.8601	0.0194	1.8795	0.4981	0.0181	0.5162	0.0000	2,053.4758	2,053.4758	0.1161	0.0000	2,056.3791
Unmitigated	0.6726	2.8005	7.0980	0.0223	1.8601	0.0194	1.8795	0.4981	0.0181	0.5162	0.0000	2,053.4758	2,053.4758	0.1161	0.0000	2,056.3791

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Convenience Market With Gas Pumps	2,560.00	2,560.00	2560.00	4,935,651	4,935,651
Total	2,560.00	2,560.00	2,560.00	4,935,651	4,935,651

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Convenience Market With Gas	9.50	7.30	7.30	0.80	80.20	19.00	72	0	28

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Convenience Market With Gas Pumps	0.593936	0.041843	0.182569	0.108325	0.016436	0.005513	0.015940	0.023523	0.001912	0.001972	0.006090	0.000748	0.001193

5.0 Energy Detail

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Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	14.3665	14.3665	5.8000e-004	1.2000e-004	14.4166
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	14.3665	14.3665	5.8000e-004	1.2000e-004	14.4166
NaturalGas Mitigated	4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.4165	0.4165	1.0000e-005	1.0000e-005	0.4190
NaturalGas Unmitigated	4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.4165	0.4165	1.0000e-005	1.0000e-005	0.4190

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5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Convenience Market With Gas Pumps	7805	4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.4165	0.4165	1.0000e-005	1.0000e-005	0.4190
Total		4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.4165	0.4165	1.0000e-005	1.0000e-005	0.4190

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Convenience Market With Gas Pumps	7805	4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.4165	0.4165	1.0000e-005	1.0000e-005	0.4190
Total		4.0000e-005	3.8000e-004	3.2000e-004	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.4165	0.4165	1.0000e-005	1.0000e-005	0.4190

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Convenience Market With Gas Pumps	43960	14.3665	5.8000e-004	1.2000e-004	14.4166
Total		14.3665	5.8000e-004	1.2000e-004	14.4166

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Convenience Market With Gas Pumps	43960	14.3665	5.8000e-004	1.2000e-004	14.4166
Total		14.3665	5.8000e-004	1.2000e-004	14.4166

6.0 Area Detail**6.1 Mitigation Measures Area**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0177	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Unmitigated	0.0177	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	4.0600e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Total	0.0177	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004

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6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	4.0600e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.0000e-005	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004
Total	0.0177	0.0000	1.5000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.9000e-004	2.9000e-004	0.0000	0.0000	3.0000e-004

7.0 Water Detail**7.1 Mitigation Measures Water**

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	1.1374	5.5000e-003	1.4000e-004	1.3159
Unmitigated	1.1374	5.5000e-003	1.4000e-004	1.3159

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Convenience Market With Gas Pumps	0.167315 / 0.102548	1.1374	5.5000e-003	1.4000e-004	1.3159
Total		1.1374	5.5000e-003	1.4000e-004	1.3159

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Convenience Market With Gas Pumps	0.167315 / 0.102548	1.1374	5.5000e-003	1.4000e-004	1.3159
Total		1.1374	5.5000e-003	1.4000e-004	1.3159

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

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8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

ATTACHMENT B

Ralph M. Vinje GE #863

"I CERTIFY THAT THE LAYOUT DRAWING SHOWS THE LOCATION OF ALL KNOWN EASEMENTS AND PUBLIC WATER LINES ON THE LOT AND ALL PUBLIC WATER LINES THAT ARE WITHIN 20 FEET OF THE LOT BOUNDARY."

Design: 11-9-16
R1: 12-5-16
R:2 3-20-17
R:3 6-19-17
10-6-17
2-12-20
2-24-20

LOT INFORMATION

DATE: 2/25/2020DEH No. LOWTS-007198

JOB No. 16-232-S

APN 186-093-19, 23 & 37

ACRES 1.19 & 0.48

Site Location

KA Shores Group LLC

c/o: Jason Weller

5820 Oberlin Drive, Ste. 201

San Diego, CA 92121

c. 619-980-5936

OF S^1 OF SE^4_4 SEC

M7-11-61

LEGEND

- ① ————— PERC TEST LOCATION
 [A] ————— GROUNDWATER BORING
 0005 ————— CONTOUR LINE W/ 1' INTERVAL
 2656' ————— 1.25" DIA. PVC PIPE DISPERSAL
 (USE 7 ZONES @ ~380'/ZONE)
 2656' ————— RESERVE SEPTIC AREA
 ————— EASEMENT
 ————— SETBACK
 — W X W ————— WATER/UTILITIES
 ROADS
 - - - - - CUT/FILL
 ————— PROPERTY LINE
 + + + + + TIGHT LINE

INSTALLATION NOTES

- Existing Commercial Fountain Business
 -Proposed Gas Station & Convenience Store
 -Use Pressure Drip Supplemental Treatment
 -Use 34 mpi @ 2.5' Trench Depth, Add 6" Sand
 -Below Dispersal Chambers For Uniformity
 -Use Application Rate = 0.489 gal./day/sqft
 -7 Gas Station Employees @ 15 gal./pers./day
 -239 Store Customers @ 5 gal./pers./day
 -Average Total Daily Flow = 1040 gal./day
 -Max. Total Daily Flow = 1300 gal./day
 -Use Safety Factor x2 = 1300 x 2 = 2600gal./day
 -See Attached Sheets For System Specifics
 -Septic System MUST NOT Be Driven Or Paved Over
 -*NOTE* All Elevations And System Components &
 -Locations To Be Verified By Installation Contractor

