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May 10, 2023
Project No: 18-06337

Joseph Brikho, Owner
BPI1EP, LLC.
245 Highland Avenue
National City, California 91950
Via email: JosephBrikho@yahoo.com

Subject: Project No. PDS2017-IC-17-056 (Paradise Valley Gas Station)
Greenhouse Gas Memorandum

Dear Mr. Brikho,

This memorandum assesses climate change impacts by quantifying greenhouse gas (GHG) emissions associated with the construction and operation of the Paradise Valley Gas Station Project (Project No. PDS2017-IC-17-056; herein referred to as the "proposed project" or "project") and evaluating against appropriate GHG screening criterion.

Project Location and Description

The project site encompasses 0.5 gross acres (21,548 square feet) and is bordered by Paradise Valley Road to the west, Elkelton Place to the south, and State Route 125 (SR-125) to the east. The regional location of the site and existing site conditions are shown in Figure 1 and Figure 2, respectively.

The project entails development of a gasoline service station (four multi-product dispensers to serve up to eight vehicles simultaneously) with a 2,318 square-foot canopy, a 3,555 square-foot convenience store building, an 855 square-foot carwash tunnel, and 16 on site vehicle parking spaces. The proposed gas station and convenience store would operate 24 hours a day, seven days a week, with a total of ten employees. The eight pump stations would provide three grades of gasoline (regular, mid-range, and premium) and diesel. Annual estimated gasoline throughput for the proposed gas station is 1 to 1.2 million gallons (850,000 to 1,050,000 gallons of gasoline and 100,000 to 150,000 gallons of diesel). Figure 3 shows the proposed project site plan.

The site is accessible from a driveway located on Paradise Valley Road. The project site plan includes proposed vehicular circulation on site. The project would provide eight off-street parking spaces: six spaces would be standard parking spaces, one space would be designated as handicap parking, and one space would be designated van pool with the option of being converted to an electric vehicle charging space based on future needs. The gas station use would provide eight parking spaces by the eight pump stations under the canopy.

The proposed development would require site preparation and grading. An estimated 100 cubic yards (CY) of soil would be cut and recompacted on site. An additional estimated 550 CY of fill would be imported to the Project site. Project construction is estimated to take between six to seven months, starting in late 2023 with opening in mid-2024.

Project Sustainability Features

Project design features that would result in reduced GHG emissions include low-flow plumbing fixtures, and a high-reflectivity cool roof. Additional GHG reductions would result from the project's incorporation of Title 24 energy standards. The project would also include one vanpool space that could be converted to a future EV space. As the project consists of a gas station and convenience store with a limited number of employees, opportunities to reduce mobile sources GHG emissions are generally limited. For example, measure that promote use of mass transit would be inherently inappropriate for the project. While there are plans to phase out fossil fuel vehicles, the demand for gasoline will exist for the foreseeable future; even with California's 2035 mandate for 100 percent of vehicles sold to be electric, there would still be legacy gasoline vehicles or vehicles from out of state that would need gasoline. In addition, while the project currently would not provide electric vehicle services, the gas station and convenience store use is located in a convenient location for automobiles, and thus would be an ideal location to add electric vehicle services when the market demand and technology for such services reaches a critical mass.

The site plan indicates landscaping along the frontage of Paradise Valley Boulevard and Elkelton Place, as well as minor strips of landscaping along the eastern project site boundary. The project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in Maximum Applied Water Allowance (MAWA) for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water (average Water Use Classification of Landscape Species factor 0.3), excluding edible vegetation and areas using recycled water.

The County requires recycling of 90 percent of inerts and 70 percent of all other materials from construction projects, per County Ordinance Section 68.508 through 68.518 (*Diversion of Construction and Demolition Materials from Landfill Disposal*). The project would be in compliance with County ordinances upon submission of a Construction and Demolition Debris Management Plan prior to the issuance of a building permit. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements.

Methodology

The project's consistency with the 2022 Scoping Plan goals and policies was analyzed to determine GHG impacts, as described further below. For informational purposes, project emissions estimates were calculated using California Emissions Estimator Model (CalEEMod), version 2016.3.2. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model was developed by BREEZE Software for the California Air Pollution Control Officers Association (CAPCOA) with collaborative input from the California air districts. CalEEMod allows for the use of standardized data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices (CAPCOA 2017). The analysis reflects the construction and operation of the project as described in Section 1.2, *Project Summary*. The input data and subsequent construction

and operation emission estimates for the proposed project are discussed below. CalEEMod output files for the project are included. CalEEMod reports and calculations are included in Attachment 2 to this report.

Construction Emissions

Construction of the project would generate temporary GHG emissions primarily from operation of construction equipment onsite, from vehicles transporting construction workers to and from the project site, and heavy trucks to import earth materials onsite. Construction equipment used for site preparation and grading typically generate the greatest amount of emissions.

The project applicant provided the construction schedule, which states construction may commence in June 2021 and may be completed by December 2021 (approximately six to seven months total). Proposed construction phases and associated durations include the following:

- Site Preparation (two weeks)
- Grading (two weeks)
- Building Construction (approximately three to four months)
- Paving (two weeks)
- Architectural Coating (two weeks)

Emissions associated with the construction period were estimated in CalEEMod based on the projected maximum amount of equipment that would be used onsite at any given time during construction activities.

Proposed development would require site preparation and grading, building construction, paving, and architectural coating. A total of 100 cubic yards (CY) of soil would be graded and recompacted on the project site and an additional 550 CY of fill would be imported. Construction is expected to occur over six to seven months, based on applicant provided construction schedule, with project opening scheduled for 2022.

Operational Emissions

CalEEMod calculates operational emissions from the project, which include carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4). For mobile sources, CO_2 and CH_4 emissions from vehicle trips to and from the project site were quantified using CalEEMod. Because CalEEMod does not calculate N_2O emissions from mobile sources, N_2O emissions were quantified using the Climate Registry's (TCR's)[1] General Reporting Protocol (TCR 2009) direct emissions factors for mobile combustion (see Attachment 2 for calculations). Trips rates in CalEEMod were adjusted based on trip generation numbers from the traffic report completed for the proposed project (Urban Systems Associates, Inc. 2020). These trip rates were used to derive total annual mileage in CalEEMod. Emission rates for N_2O emissions were based on vehicle mix output generated by CalEEMod and the emission factors found in TCR's General Reporting Protocol.

Significance Screening Levels

[1] This document was completed under TCR's previous name, the California Climate Action Registry.

Based on Appendix G of the CEQA Guidelines, impacts related to GHG emissions from the proposed project would be significant if the project would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The vast majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. As a result, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130[f]). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan consistent with CEQA Guidelines Section 15183.5 renders a cumulative impact less than significant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of less-than-significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

San Diego County has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Neither San Diego County Air Pollution Control District, Office of Planning and Research (OPR), California Air Resources

Board (CARB), California Air Pollution Control Officers Association, nor any other State or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Therefore, for this project San Diego County has selected to analyze the significance of the project's GHG emissions impacts based upon consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change. San Diego County has also quantified the project's GHG emissions for informational purposes.

Project Impact Analysis

Consistency with Applicable GHG-Reduction Plans

2022 Scoping Plan

The principal state plans and policies for reducing GHG emissions are AB 32, SB 32, and AB 1279. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020; the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030; and the goal of AB 1279 is to achieve net zero greenhouse gas emissions no later than 2045 and reduce GHG emissions by 85 percent below 1990 levels no later than 2045. The 2022 Scoping Plan expands upon earlier plans to include the AB 1279 targets. The 2022 Scoping Plan Update identifies plans and regulations and strategies that are to be implemented at the State and project level that will reduce GHG emissions consistent with State policies. Table 1 demonstrates the project's consistency with the strategies and actions outlined in the 2022 Scoping Plan that would allow the project to contribute its fair share to GHG reductions.

Table 1 Consistency with Applicable 2022 Scoping Plan State Actions GHG Emission Reduction Strategies

Strategy/Action	Project Consistency
Climate Legislation and executive orders enacted since the 2017 Scoping Plan and Directly Reflected in the 2022 Scoping Plan	
AB 1279 Establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels.	**Consistent.** This bill is implemented at the State level through implementation of the 2022 Scoping Plan Update. This action does not directly apply to the project; however, the project would be subject to and consistent with applicable project level strategies as detailed below that would allow the project to contribute its fair share to GHG reductions.
SB 905 Requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology.	**Consistent.** This bill is implemented at the State level. The project would be consistent with this bill through compliance with State and local policies enacted under this bill.
SB 846 Extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans.	**Consistent.** This bill is implemented at the State level. The project would be consistent with this regulation through the use of electricity produced and sold within the State.
SB 1020 Adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at	**Consistent.** This bill is implemented at the State level. The project would be consistent with this regulation through the use of electricity produced and sold within the State

Strategy/Action	Project Consistency
90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035.	that the project would use through SDG&E energy that it purchases, which would allow the project to contribute its fair share to GHG reductions.
SB 1137 Prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions.	**Not Applicable.** The proposed project is a commercial development that would not develop new oil or gas wells or infrastructure.
SB 1075 Requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen	**Consistent.** This bill is implemented at the State level. The project would be consistent with this bill through compliance with State and local policies enacted under this bill.
AB 1757 Requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience.	**Not Applicable.** The proposed project is a commercial development that would not develop new virgin land or implement new carbon sinks; therefore, while not directly applicable to the project, the project would not interfere with the implementation of this bill.
SB 1206 Mandates a stepped sales prohibition on newly produced high-global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-GWP, i.e., GWP [less than (<)] 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.	**Consistent.** This bill is implemented at the State level. The project would be consistent with this bill through compliance with State and local policies enacted under this bill as applicable to the project (i.e., refrigerant use).
SB 27 Requires CNRA, in coordination with other state agencies, to establish the NWL Climate Smart Strategy by July 1, 2023.	**Not Applicable.** The proposed project is a commercial development that would not develop new virgin land or implement new carbon sinks; therefore, while not directly applicable to the project, the project would not interfere with the implementation of this bill.
SB 596 Requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045.	**Consistent.** While this bill does not directly apply to the project, the project would be consistent in that its construction would require use of concrete, and therefore, as the concrete industry institutes net-zero-emissions processes, the cement used in the development of the project would be compliant with the employed strategies which would allow the project to contribute its fair share to GHG reductions. There are no components of the project that would directly conflict with the implementation of this bill.
Executive Order N-82-20 Combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030.	**Not Applicable.** The proposed project is a commercial development that would not develop new virgin land, and instead redevelop a disturbed, vacant lot. Statewide goals to conserve biodiversity would be accomplished through biologically-sensitive land elsewhere.

Strategy/Action	Project Consistency
Executive Order N-79-20 ▪ Establishes a State goal for in-state sales of zero-emissions on-road and off-road vehicles.	**Not Applicable.** This regulation is implemented at the State level. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel.
▪ Establishes a goal to identify actions and investment strategies to improve clean transportation and sustainable freight and transit options.	**Consistent.** This regulation is implemented at the State level. The project would not actively conflict or hinder the improvement of clean transportation or sustainable freight and transit options.
▪ Establishes the use of existing authorities for the State Air Resources Board, the Energy Commission, Public Utilities Commission, and other relevant State agencies to accelerate deployment of affordable fueling and charging options for zero-emissions vehicles.	**Consistent.** This regulation is implemented at the State level. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel, which would allow the project to contribute its fair share to GHG reductions.
Executive Order N-19-19 Directed state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy.	**Consistent.** The project would be required to comply with all State (i.e., Title 24) plans for the reduction of GHGs. Project design features that would result in reduced GHG emissions include low-flow plumbing fixtures, and a high-reflectivity cool roof. Additional GHG reductions would result from the project's incorporation of Title 24 energy standards. The project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in MAWA for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. These measures would allow the project to contribute its fair share to GHG reductions.
SB 576 Mandates Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat.	**Consistent.** While this bill would not directly apply to the project, the project would not interfere with the implementation of this bill as it is a redevelopment project and would not involve the development or direct access of coastal waters or habitats.
AB 65 Requires the State Coastal Conservancy to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change.	**Consistent.** While this bill does not directly apply to the project, the project would not interfere with the implementation of this bill as it is a redevelopment project and would not involve the development or direct access of coastal waters or habitats.

Strategy/Action	Project Consistency
Executive Order B-55-18 Establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter.	**Consistent.** The project would be required to comply with all State (i.e., Title 24) plans for the reduction of GHGs. Project design features that would result in reduced GHG emissions include low-flow plumbing fixtures, and a high-reflectivity cool roof. Additional GHG reductions would result from the project's incorporation of Title 24 energy standards. The project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in MAWA for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. These measures would allow the project to contribute its fair share to GHG reductions.
SB 100 Mandates that the CPUC, CEC, and CARB plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. This bill also updates the state's Renewables Portfolio Standard (RPS) to include the following interim targets: ▪ 44% of retail sales procured from eligible renewable sources by December 31, 2024. ▪ 52% of retail sales procured from eligible renewable sources by December 31, 2027. ▪ 60% of retail sales procured from eligible renewable sources by December 31, 2030.	**Consistent.** While this bill would not directly apply to the project, the project would not interfere with the implementation of this bill as it a commercial redevelopment project and not an energy producer. By being a purchaser of the energy that is complying with these standards, the project would be able to contribute its fair share to GHG reductions.
AB 2127 Requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40% below 1990 levels by 2030.	**Not Applicable.** This regulation is implemented at the State level. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging.
SB 30 Requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.	**Consistent.** While this bill would not directly apply to the project, the project would not interfere with the implementation of this bill as it is development of a disturbed, vacant lot and would not involve the development of or interference with existing natural lands.

Strategy/Action	Project Consistency
AB 2061 Authorizes a near-zero-emission vehicle or a zero- emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds.	**Consistent.** This regulation is implemented at the State level. The project would not interfere with the implementation of this bill.
Actions for Scoping Plan Scenario: AB 32 GHG Inventory Sectors	
GHG Emissions Reductions Relative to the SB 32 Target 40% below 1990 levels by 2030	**Consistent.** The project would be required to comply with all State (i.e., Title 24) plans for the reduction of GHGs. Project design features that would result in reduced GHG emissions include low-flow plumbing fixtures, and a high-reflectivity cool roof. Additional GHG reductions would result from the project's incorporation of Title 24 energy standards. The project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in MAWA for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. These measures would allow the project to contribute its fair share to GHG reductions.
Smart Growth/Vehicle Miles Traveled (VMT) VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	**Not Applicable.** As the project consists of a gas station and convenience store with a limited number of employees, opportunities to reduce mobile sources GHG emissions are generally limited. For example, measures that promote use of mass transit would be inherently inappropriate for the project. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel. The project includes one vanpool space that could be converted into a future EV charging space.
Light-Duty Vehicle (LDV) Zero Emission Vehicles (ZEVs) 100% of LDV sales are ZEV by 2035.	**Not Applicable.** As the project consists of a gas station and convenience store with a limited number of employees, opportunities to reduce mobile sources GHG emissions are generally limited. For example, measures that promote the use of mass transit would be inherently inappropriate for the project. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel. The plan includes one vanpool space that could be converted into a future EV charging space.

Strategy/Action	Project Consistency
Truck ZEVs 100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	**Not Applicable.** As the project consists of a gas station and convenience store with a limited number of employees, opportunities to reduce mobile sources GHG emissions are generally limited. For example, measures that promote the use of mass transit would be inherently inappropriate for the project. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel. The plan includes one vanpool space that could be converted into a future EV charging space.
Aviation ▪ 20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. ▪ Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	**Not Applicable.** The project is a commercial use that would not result in direct or indirect effects on or affiliated with the aviation industry.
Ocean-Going Vessels (OGV) 2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	**Not Applicable.** The project is a commercial use that would not result in direct or indirect access to or affiliation with ocean-going vessels.
Port Operations 100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	**Not Applicable. T**he project is a commercial use that would not result in direct or indirect access to or affiliation with port operations.
Freight and Passenger Rail ▪ 100% of passenger and other locomotive sales are ZEV by 2030. ▪ 100% of line haul locomotive sales are ZEV by 2035. ▪ Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	**Not Applicable.** The project is a commercial use that would not result in direct or indirect access to or affiliation with rail operations.
Oil and Gas Extraction Reduce oil and gas extraction operations in line with petroleum demand by 2045.	**Consistent.** The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel; in that scenario, the project site would assist the State by providing access to non-fossil fuels for vehicles.
Petroleum Refining Carbon capture and sequestration (CCS) on majority of operations by 2030, beginning in 2028 Production reduced in line with petroleum demand.	**Consistent.** The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel.
Electricity Generation	**Consistent.** The project would be required to comply with all State (i.e., Title 24) plans for the reduction of GHGs.

Strategy/Action	Project Consistency
▪ Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMT of CO_2e) in 2030 and 30 MMT of CO_2e in 2035 Retail sales load coverage. ▪ 20 gigawatts (GW) of offshore wind by 2045. ▪ Meet increased demand for electrification without new fossil gas-fired resources.	Project design features that would result in reduced GHG emissions include low-flow plumbing fixtures, and a high-reflectivity cool roof. Additional GHG reductions would result from the project's incorporation of Title 24 energy standards. The project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in MAWA for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. These measures would allow the project to contribute its fair share to GHG reductions.
New Residential and Commercial Buildings All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	**Consistent.** The project would be required to comply with all State (i.e., Title 24) plans that would regulate electric appliances. As the project would be built prior to 2029, it would not be required to install all electric appliances and therefore would not conflict with this strategy.
Existing Residential Buildings ▪ 80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. ▪ Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	**Not Applicable.** The project is not a residential development.
Existing Commercial Buildings ▪ 80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. ▪ Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	**Consistent.** The project would be required to comply with all State (i.e., Title 24) plans that would regulate electric appliances. As the project would be built prior to 2029, it would not be required to install all electric appliances and therefore would not conflict with this strategy.
Food Products 7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	**Consistent.** The project has a convenience store use that would contain refrigerated quick-service food. Through receiving energy from SDG&E, which has to comply with state renewable energy portfolio targets, the project would be consistent with this action. This would allow the project to contribute its fair share to GHG reductions.
Construction Equipment 25% of energy demand electrified by 2030 and 75% electrified by 2045.	**Consistent.** The project would be constructed prior to 2030, and therefore would not conflict with this action.
Chemicals and Allied Products; Pulp and Paper ▪ Electrify 0% of boilers by 2030 and 100% of boilers by 2045. ▪ Hydrogen for 25% of process heat by 2035 and 100% by 2045. ▪ Electrify 100% of other energy demand by 2045.	**Not Applicable.** The project is a commercial use and would not be directly associated with chemicals and allied products and pulp and paper manufacturing.
Stone, Clay, Glass, and Cement	**Not Applicable.** The project is a commercial use and would not be directly associated with stone, clay, glass, or

Strategy/Action	Project Consistency
▪ CCS on 40% of operations by 2035 and on all facilities by 2045. ▪ Process emissions reduced through alternative materials and CCS.	cement production. Furthermore, project construction would be completed prior to 2035; therefore, all products from these industries would already be in place on the site.
Other Industrial Manufacturing 0% energy demand electrified by 2030 and 50% by 2045.	**Not Applicable.** The project is a commercial use and would not be directly include industrial manufacturing.
Combined Heat and Power Facilities retire by 2040.	**Not Applicable.** The project is a commercial use and would not a power-producing facility.
Agriculture Energy Use 25% energy demand electrified by 2030 and 75% by 2045.	**Not Applicable.** The project is a commercial use and would not be directly associated with agriculture.
Low Carbon Fuels for Transportation Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	**Consistent.** The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as biofuels or hydrogen fuel.
Low Carbon Fuels for Buildings and Industry ▪ In 2030s, biomethane blended in pipeline. ▪ Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. ▪ In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters.	**Consistent.** The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. The project would not conflict with State goals to increase low carbon fuels in industrial uses.
Non-combustion Methane Emissions ▪ Increase landfill and dairy digester methane capture. ▪ Some alternative manure management deployed for smaller dairies. ▪ Moderate adoption of enteric strategies by 2030. ▪ Divert 75% of organic waste from landfills by 2025. ▪ Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand.	**Consistent.** While the project would not directly involve non-combustion methane emission disposition, the project would comply with industry, local, and State requirements for the disposition of organic waste. Therefore, the project would not conflict with this strategy for reducing GHG emissions.
High GWP Potential Emissions Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	**Consistent.** While the project would not directly involve high GWP product use, the project would comply with industry, local, and State requirements for refrigerant usage. Therefore, the project would not conflict with this strategy for reducing high GWP emissions.
Actions for the Scoping Plan Scenario: NWL Sectors	
Natural and Working Lands ▪ Conserve 30% of the state's NWL and coastal waters by 2030. ▪ Implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities—and in particular low-income, disadvantaged, and vulnerable communities.	**Consistent.** The project is a commercial use and would not require the development of NWL.
Forests and Shrublands At least 2.3 million acres treated statewide annually in forests, shrublands/chaparral, and grasslands, comprised of regionally	**Not Applicable.** The project is a commercial use and would not directly or indirectly affect forests and shrublands.

Strategy/Action	Project Consistency
specific management strategies that include prescribed fire, thinning, harvesting, and other management actions. No land conversion of forests, shrublands/chaparral, or grasslands.	
Grasslands At least 2.3 million acres treated includes increased management of grasslands interspersed in forests to reduce fuels surrounding communities using management strategies appropriate for grasslands. No land conversion of forests, shrublands/chaparral, or grasslands.	**Not Applicable.** The project is a commercial use and would not directly or indirectly affect grasslands.
Croplands ▪ Implement climate smart practices for annual and perennial crops on ~80,000 acres annually. Land easements/conservation on annual crops at ~5,500 acres annually. ▪ Increase organic agriculture to 20% of all cultivated acres by 2045 (~65,000 acres annually).	**Not Applicable.** The project is a commercial use and would not directly or indirectly affect agriculture lands.
Developed Lands ▪ Increase urban forestry investment by 200% above current levels and utilize tree watering that is 30% less sensitive to drought. ▪ Establish defensible space that accounts for property boundaries.	**Consistent.** The project is a commercial use that would include landscaping with new trees. The project would be required to comply with State and local policies for the incorporation of trees into the project. Additionally, the project would include sustainable landscaping, including drought-tolerant tree and other plant selections and watering methods.
Wetlands Restore 60,000 acres of Delta wetlands.	**Not Applicable.** The project is a commercial use and would not located in an area where wetlands could otherwise be restored/established.
Sparsely Vegetated Lands Land conversion at 50% of the Reference Scenario land conversion rate.	**Not Applicable.** The project is a commercial use and would not entail the development of previously undisturbed lands.

Source: CARB 2022

The 2022 Scoping Plan also discusses how California encourages local jurisdictions to take ambitious, coordinated climate action at the community scale; action that is consistent with and supportive of the state's climate goals, which explores the role of local government action and CEQA in detail. These local actions are discussed in detail under Appendix D of the 2022 Scoping Plan. Appendix D identifies priority GHG reduction strategies for local governments under the following three priority areas:

- Transportation electrification
- VMT reduction
- Building decarbonization

The applicability of priority GHG reduction strategies under these priority areas is discussed in Table 2.

Table 2 Consistency with Applicable 2022 Scoping Plan Appendix D Local Actions Priority GHG Reduction Strategies

Strategy/Action	Project Consistency
Transportation Electrification	

Strategy/Action	Project Consistency
Convert local government fleets to ZEVs and provide EV charging at public sites	**Not Applicable.** This strategy would be implemented by the County. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging, which would help support the County's conversion of fleets to ZEVs by providing additional charging stations. The project includes one vanpool space that could be converted into a future EV charging space.
Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)	**Not Applicable.** This strategy would be implemented by the County. The proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging, which would help support the County's conversion of fleets to ZEVs by providing additional charging stations. The project includes one vanpool space that could be converted into a future EV charging space.
VMT Reduction	
Reduce or eliminate minimum parking standards	**Not Applicable.** This strategy would be implemented by the County; the project must adhere to current parking standards. The project includes one vanpool space and bicycle parking that has the effect of reducing the need for more parking spaces by allowing for alternative modes of transportation.
Implement Complete Streets policies and investments, consistent with general plan circulation element requirements	**Consistent.** Complete streets are streets that are designed and operated to enable safe access for all users and for all modes of travel including non-motorized users and transit riders. The project would be in support of complete streets as it is an infill development, making use of an underutilized parcel in the County that would increase density of development near transit. The project would provide convenience store access to a nearby bus station and single-family neighborhood. The project would also implement a vanpool space and bicycle parking to provide access to alternative modes of transportation.
Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc	**Consistent.** Improving transit service frequencies, reducing fares, and creating bus priority lanes would be implemented by local transportation agencies. The project is an infill development, making use of an underutilized parcel in the County that would increase density of development near transit. The project would provide convenience store access to a nearby bus station and single-family neighborhood. This would allow the project to contribute its fair share to GHG reductions.
Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking	**Consistent.** The project would implement a vanpool space and bicycle parking to provide access to alternative modes of transportation. This would allow the project to contribute its fair share to GHG reductions.
Implement parking pricing or transportation demand management pricing strategies	**Not Applicable.** The proposed project use is planned to satisfy existing vehicle transportation fuel demand, as well as demand for car washes or convenience store needs. Limited parking is provided for

Strategy/Action	Project Consistency
	customers; parking pricing strategies would not be effective for such a commercial use.
Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)	**Consistent.** Amending zoning or development codes would be implemented by the County. The project is an infill development, making use of an underutilized parcel in the County. The project would provide convenience store access to a nearby bus station and single-family neighborhood. The project would also provide bicycle parking spaces to encourage the use of alternative modes of transportation. This would allow the project to contribute its fair share to GHG reductions.
Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements)	**Consistent.** The property is a previously disturbed, vacant lot. The project would focus development on an infill area and would not convert "greenfield" land to a developed use.
Building Decarbonization	
Adopt all-electric new construction reach codes for residential and commercial uses	**Consistent.** This strategy would be implemented by the County. The goal of this strategy is to increase the use of electricity and reduce fossil fuel emissions. While the project would have a natural gas component, the project would be consistent with this goal because the project receives energy from SDG&E, which has to comply with state renewable energy portfolio targets, which includes receiving 60 percent renewable energy by 2030 and zero carbon sources by 2045. Furthermore, the three applications of natural gas in this project - providing hot water for the gas station and car wash, as well as powering appliances in the restaurant - have the potential to be easily converted to electric in the future without requiring significant construction activities. In addition, the project would be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures, and a high-reflectivity cool roof. Also consistent with reducing energy use from reducing water usage, the project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in MAWA for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. This would allow the project to contribute its fair share to GHG reductions.
Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)	**Not Applicable.** This strategy would apply to existing buildings. Nonetheless, the project would be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures and a high-reflectivity cool roof.

Strategy/Action	Project Consistency
Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances	**Not Applicable.** This strategy would apply to existing buildings. Nonetheless, while the project would have a natural gas component, the project would be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures and a high-reflectivity cool roof. Furthermore, the three applications of natural gas in this project - providing hot water for the gas station and car wash, as well as powering appliances in the restaurant - have the potential to be easily converted to electric in the future without requiring significant construction activities.
Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing)	**Consistent.** This strategy would be implemented by the County to streamline permitting for renewable energy production. The goal of this strategy is to increase the use of renewable energy and increase energy efficiency. The project would be consistent with this goal because the project receives energy from SDG&E, which has to comply with state renewable energy portfolio targets, which includes receiving 60 percent renewable energy by 2030 and zero carbon sources by 2045. In addition, the project would be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures, and a high-reflectivity cool roof. Also consistent with reducing energy use from reducing water usage, the project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in MAWA for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or no summer water. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. This would allow the project to contribute its fair share to GHG reductions.
Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings)	**Consistent.** This strategy would be implemented by the County to implement renewable energy production and energy storage directly in new public projects. The goal of this strategy is to increase the use of renewable energy and increase energy efficiency. The project would be consistent with this goal because the project receives energy from SDG&E, which has to comply with state renewable energy portfolio targets, which includes receiving 60 percent renewable energy by 2030 and zero carbon sources by 2045. In addition, the project would be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures, and a high-reflectivity cool roof. Also consistent with reducing energy use from reducing water usage, the project applicant will provide an irrigation plan for the project site that demonstrates a 40 percent reduction in MAWA for outdoor water use in the proposed landscaped areas. Consistent with the County Landscaping Ordinance, the project would incorporate climate adapted plants that require occasional, little, or

Strategy/Action	Project Consistency
	no summer water. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements. This would allow the project to contribute its fair share to GHG reductions.

Source: CARB 2022

As shown in Table 2, while the majority of the strategies are to be implemented by the County or local transportation agencies, the project would contribute its fair share of GHG reductions in relation to transportation electrification, VMT reduction, and building decarbonization. While the project is planned to satisfy existing vehicle transportation fuel demand, it does have VMT-reducing features to contribute its fair share, such as one vanpool space that would allow a reduction in vehicle miles, that would have the effect of reducing GHG emissions; in addition, the space could be converted into a future EV charging space. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel; in that scenario, the project site would assist the 2021 Regional Plan goal of healthy air and reduced GHG emissions. In addition, while the project has a natural gas component, it would contribute its fair share to reducing GHG emissions from building decarbonization, because the project receives energy from SDG&E, which has to comply with state renewable energy portfolio targets, which includes receiving 60 percent renewable energy by 2030 and zero carbon sources by 2045. Furthermore, the three applications of natural gas in this project - providing hot water for the gas station and car wash, as well as powering appliances in the restaurant - have the potential to be easily converted to electric in the future without requiring significant construction activities. The project would also be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures, and a high-reflectivity cool roof. Therefore, the project is consistent with Appendix D of the 2022 Scoping Plan.

2021 Regional Plan

San Diego Association of Governments (SANDAG) adopted the *2021 Regional Plan on December 10, 2021*, which serves as the Regional Comprehensive Plan (RCP) and Sustainable Communities Strategy (SCS) for the region. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies.

One of the main goals of the 2021 Regional Plan is for healthy air and reduced GHG emissions. According to the 2021 Regional Plan, reducing our reliance on the automobile as a primary mode of transportation requires that safe, affordable, and convenient alternatives are available. It also requires that people can access their jobs and other destinations by taking shorter trips. This can be achieved by focusing growth and development in the region's urbanized areas, where there are existing and planned transportation options. The 2021 Regional Plan reduces per capita GHG emissions from cars and light-duty trucks to 20 percent below 2005 levels by 2035, exceeding the region's state-mandated target of 19 percent.

Many of the strategies to achieve this are statewide or regional initiatives to be implemented by state or regional jurisdictions, and therefore would not apply at the project-level. The project does include one vanpool space that would allow a reduction in vehicle miles, that would have the effect of reducing GHG emissions and creating more healthy air; in addition, the space could be converted into a future EV charging space. In general, a gas station use is inherently not oriented for sustainable transportation uses such as transit and rail. Additionally, the proposed gas station use is planned to satisfy existing vehicle transportation fuel demand. In the future as vehicle transportation demands change, a use located in major transportation areas such as a gas station would be likely locations for alternative fuels such as electric charging or hydrogen fuel; in that scenario, the project site would assist the 2021 Regional Plan goal of healthy air and reduced GHG emissions. Therefore, the project would not conflict with or obstruct implementation of the 2021 Regional Plan.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the project is consistent with the plans, policies, regulations and GHG reduction actions/strategies outlined in the 2021 Regional Plan and the 2022 Scoping Plan. Impacts from GHG emissions would be less than significant.

GHG Emissions

Construction

Project construction is estimated to take between six to seven months, starting in June 2021. As shown in Table 3**Error! Reference source not found.**, construction activity for the project would generate an estimated 75 MT CO_2e. When amortized over a 30-year period[2], construction of the project would generate about 2.5 MT CO_2e per year.

Table 3 Estimated Construction Emissions of Greenhouse Gases

	Annual Emissions ($MT CO_2e$)
Total	75
Amortized over 30 years	2.5
See Attachment 2 for CalEEMod results	

Combined Construction, Stationary, and Mobile Source Emissions

Table 4**Error! Reference source not found.** combines the amortized construction (Table 3**Error! Reference source not found.**), operational, and mobile GHG emissions associated with the project. The annual emissions would total approximately 831 MT CO_2e. As previously stated, this is provided for informational purposes only and is not used in the environmental impact analysis.

[2] Consistent with the industry standard, total construction GHG emissions resulting from a project were amortized over 30 years and added to operational GHG emissions to account for their contribution to GHG emissions over the lifetime of the project (SCAQMD 2009).

Table 4 Combined Annual Emissions

Emission Source	Project Emissions (MT CO_2e)
Construction	2.5
Operational	
Area	<0.1
Energy	22.1
Solid Waste	9.2
Water	3.5
Mobile[1]	
CO_2 and CH_4	776
N_2O	17.7
Total	**831**

Source: Calculations were made in CalEEMod, see Attachment 1 for full model output. Values have been rounded.

[1] N_2O emissions were quantified using guidance from CARB and the EMFAC2017 Emissions Inventory for the San Diego County region (see Attachment 2 for calculations)

Conclusion

The plan consistency analysis provided above demonstrates that the project is consistent with the plans, policies, regulations and GHG reduction actions/strategies outlined in the 2021 Regional Plan and the 2022 Scoping Plan. Impacts from GHG emissions would be less than significant.

Sincerely,
Rincon Consultants, Inc.

Bill Vosti, MESM
Senior Environmental Planner

John Moreland
Director-In-Charge

Attachments

Figures

Attachment 1 CalEEMod Reports (Annual, Winter, Summer) and Calculations

References

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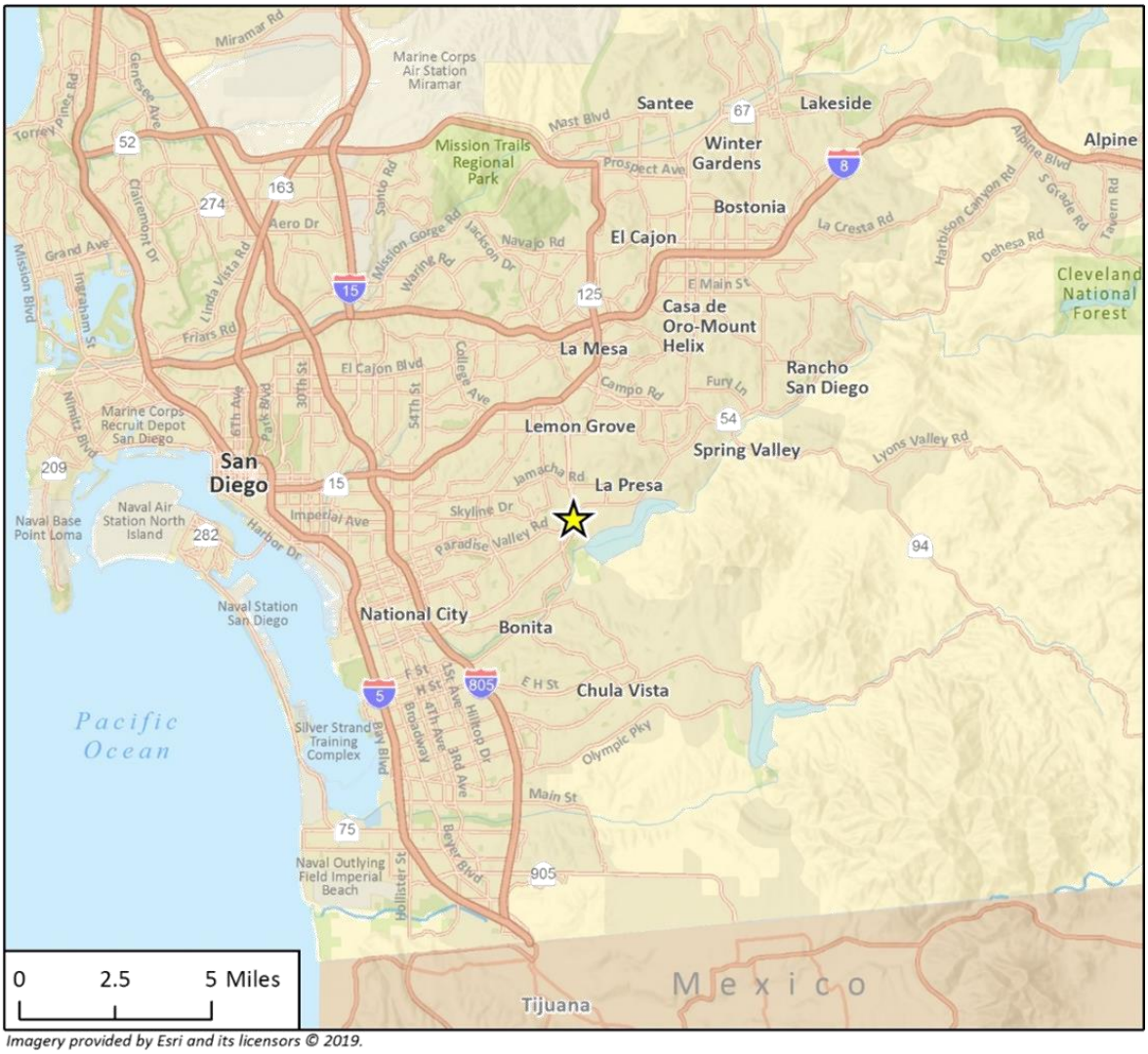
Figures

Figure 1 Vicinity Map



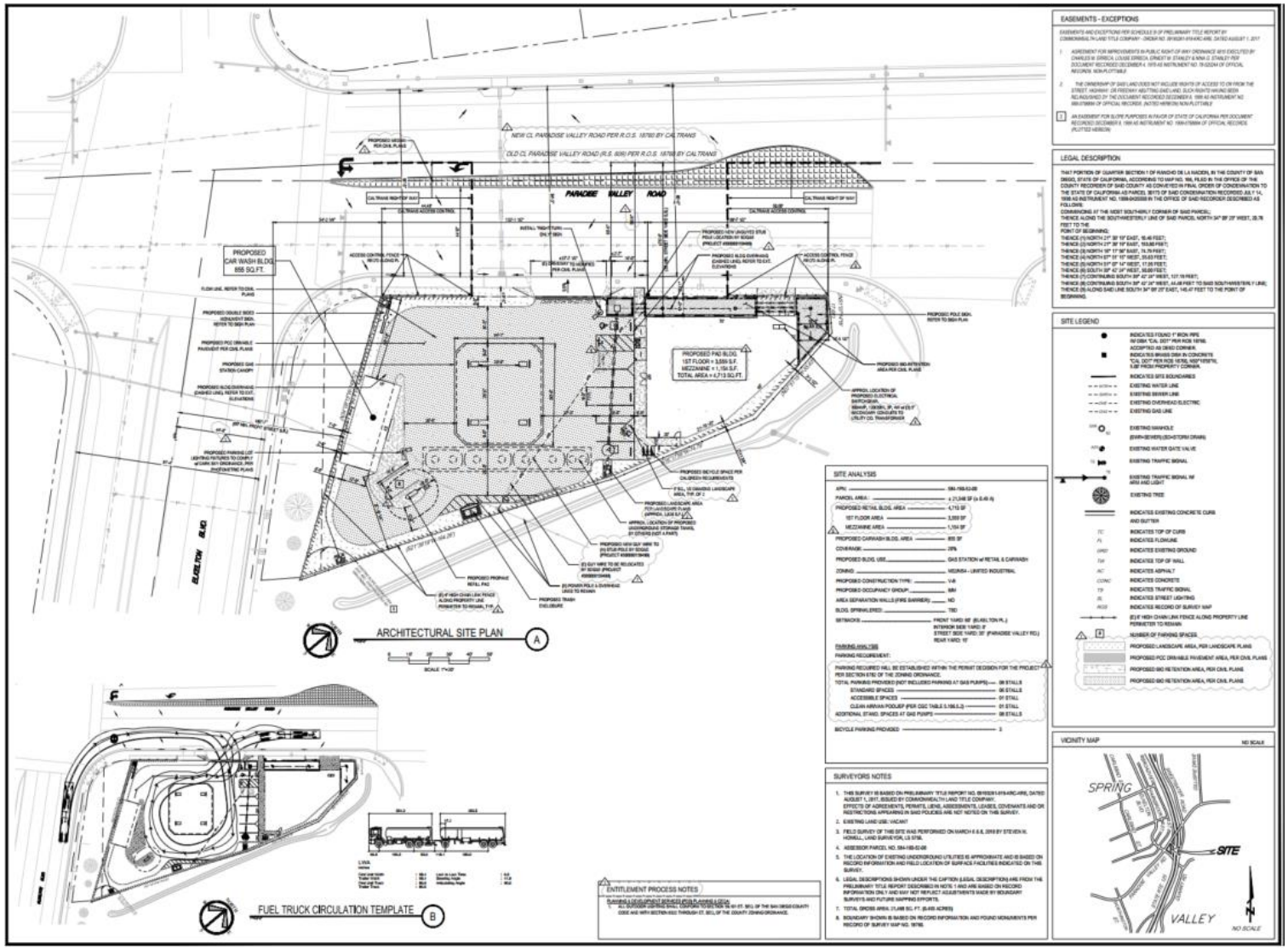
Imagery provided by Esri and its licensors © 2019.

Figure 2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2020.

Fig 2 Project Location

Figure 3 Site Plan



Source: MPA Architects, Inc. 2023.

Attachment 1

CalEEMod Reports (Annual, Winter, Summer) and Calculations