Attachment F: Critique of Costco's TIA

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Rebuttal of Costco's Traffic Impact Analysis

by
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A. Overview

This filing is intended as a rebuttal of the Traffic Impact Analysis (TIA) that Costco filed (as Exhibit P) in support of its Special Exception application (S-2863), requesting approval to build/operate a mega gas station in the southwest quadrant of Westfield's Wheaton Mall. This rebuttal is intended to meet the needs of the staff at Montgomery County Planning Commission, who are charged with evaluating Costco's filings (as well as any filings by opponents of the application) and recommend to the Planning Board whether the Board should approve, disapprove, or take no position on the application. This rebuttal is also intended to serve as a filing with the Planning Board, and with the Board of Appeals Hearing Examiner who will hear testimony regarding the application [3]. Furthermore, it is intended to be readable by the general public, who may/may not have had the time to work through the various filings (many are long and highly technical documents) that are used to convince all Parties that the application should/should not be approved. This filing will be posted to our website once all of our filings have been submitted.

B. Format

Planning staff has assured us that there is no single approved format for filings such as this rebuttal, so we [4] have adopted this discussion format, in the hope that citizens will not be put off [as they might be when approaching the highly technical, jargon-laden filings that Montgomery County Code (law) is presumed to require in cases such as S-2863].

We first explain briefly our understanding of the methodology of the TIA (and reference the report of our own traffic expert, Exhibit E). We then state what portions of the conclusions that Costco reached appear to be valid given the presumptions inherent in the use of the TIA approach. We next discuss our reasons for asserting that the approach itself is not appropriate for the elements of the Code that the TIA is used to satisfy. We then discuss (again with reference to the report of our own traffic expert) why Costco's TIA does not address certain essential points related to the impact of the proposed use (a mega gas station) at the specific site. We conclude with the assertion of the specific portions of the Code that Costco, its TIA notwithstanding, has failed to satisfy.

C. What Costco's TIA Does Show

As we studied Costco's filing, we met with planning commission staff and sought their professional guidance in trying to understand the TIA. We presented them with a large list of questions (see attachment A) and discussed with them their answers to our various questions. We came to the understanding that the TIA is based upon an agreed-upon scope of study, which involves spelling out a number of intersections that must be evaluated as to the level of traffic at each intersection under a range of conditions. The study must also consider reasonable projections of the potential

impact, on traffic at those intersections, of not only the proposed use (the mega gas station), but also of all other expected demands on traffic that can be anticipated to result from other pending developments in the range of the study. The analysis generates values for cars crossing and/or turning at each designated intersection at certain specified times of the day and days of the week. The data is then used to determine a number (the CLV) for each intersection that has been studied. These numbers are then compared with the allowable CLVs for intersections in the areas under study and, if the CLVs do not approach or exceed the allowed CLVs, the TIA is deemed to have proven that the expected traffic impact is permissible. [The report of our own traffic expert (Exhibit E), as well as his discussions with us, gave us essentially the same understanding of the process.] The applicable CLV values (as indicated in the relevant master and sector plans) are 1800, for intersections in the portion of the project area that is adjacent to the CBD of Wheaton, and 1600 for all other intersections. Exhibits 11A and 11B of Costco's TIA show that the calculated CLV values for the various intersections are all in the range of about 200-1200 and that most are around 500-1000. Planning staff explained that the calculated values seem reasonable, given the data at hand and are consistent with other such studies carried out in Montgomery County and nationwide. Our own traffic expert reaches the same conclusion. We could attempt to focus on certain individual intersections where the CLV values are quite high, but the overall pattern of the numbers is such that planning staff are very unlikely to accept any assertion that Costco's TIA fails to satisfy the standards that apply in evaluation of their compliance with Code, in so far as TIA is relevant.

D. What Costco's TIA Does Not Show

The reason we spent so much time in coming to an understanding of the TIA, was our concern as to whether it could actually allow an assessment of Costco's obligation to satisfy two sections of the relevant Code, specifically section 59-G-1.21 (a) (4) and section 59-G-1.21 (a) (8). These require Costco to prove, respectively that "*the proposed use is in harmony with the specific character of the neighborhood, in that by its size and mode of operation it will not have disruptive impacts by virtue of the additional traffic and traffic congestion it will impose on the neighborhood*" and "*prove the absence of adverse effects (inherent and/or non-inherent) on the health, safety, and general welfare of residents, visitors, or workers."* That is, Costco must prove the absence of negative impacts, on the neighborhood and/or people coming to or working in the Mall, due to traffic congestion, or the effects of traffic congestion on safety.

[We have deliberately quoted the two sections of the Code together (above) because they cannot be separated. Traffic congestion as a nuisance and traffic congestion as it impacts safety are inextricably inter-related, as we discuss later, in section E.]

We remain unconvinced that Costco has met the burden of proof on these two points. We have three concerns: two are quite specific, the other more general.

As to the specific:

1. The scoping agreement under which the TIA studies were carried out did not include a number of intersections along University Boulevard immediately adjacent

to the Kensington Heights community. These are the intersections, with University, of St. Paul, Hobson, and Drumm. None of these is a signalized intersection and thus they were not included in the scoping agreement. But each is a major point of ingress/egress for the Kensington Heights community and each is routinely clogged when the Mall experiences heavy traffic (e.g. the holiday shopping season) as well as when traffic along University is slowed by weather conditions. When weather and heavy volume at the Mall conspire (e.g. rain or snow during the holiday season), the clogging of University has a seriously negative impact on residents of Kensington Heights who are trying to exit (or enter) the neighborhood via St. Paul, Hobson, or Drumm. The intersection at Drumm is especially problematic precisely because it is not signalized (indeed cannot be signalized, due to SHA regulations) and has very poor "sight lines". The TIA is silent on these intersections.

2. The intersection of Valley View with University Boulevard is one of four entrances to the Mall for vehicular traffic. In PM hours the CLV values are projected to reach 750 (the allowed value is 1600) and we believe that when the Costco store is opened and if the gas station is approved, the percentage of traffic that uses this entrance will increase because the intersection of the ring road (within the Mall) with University (#16 on Costco's TIA maps) is already a bottle necking point (the TIA analysis cannot address this) and the increased traffic coming into the Mall is very unlikely to use the other intersection off University (at East Avenue), precisely because of the bottle-necking at the Valley View/Ring Road intersection. Costco has provided no numbers on how much additional traffic Costco will actually bring to the Mall and we assert that there is no truly comparable situation from which approximations can realistically be made about future bottle necking at the intersection of Valley View and the ring road.

As to the general:

3. We have a more general concern, namely whether the TIA approach can in fact be relied upon to provide an accurate assessment of the likelihood of traffic congestion. Experts agree that it can provide accurate estimates of CLVs. But it is a governmental decision as to what criteria to set for the cut-off value for the CLV; and it is a governmental decision as to how strictly to apply the CLV criteria. If the CLV number for the intersection of University and Valley View were to increase say to 1000 (well below the cut-off value of 1600), but we experience traffic snarls at that intersection, are we to assume we are not really "stuck in traffic"? We are certainly not the only residents of Montgomery County who experience traffic congestion. Nor are we the only ones who frequently encounter situations where the congestion is unacceptable. Are we as citizens simply not understanding that traffic is flowing smoothly, but we cannot see its smooth flow? Or is it not in fact more logical to decide that the CLV approach to evaluating what development will result in acceptable/unacceptable traffic congestion has failed us in the past and is likely to fail us in the future. While the numbers tell us that no intersections are at the failure level, are we really to accept that the time we spend in traffic is not an accurate measure of the failure of our modeling system(s) to identify failures of the road network?

E. What Costco's TIA Does Not Even Address

Even if the TIA approach is considered extremely accurate and of high predictive value as to congestion at intersections, it is simply not relevant to the issue of traffic congestion within the parking lot in which the proposed mega gas station is to be built and operated. The study of our traffic expert (Exhibit E) confirms our concerns in this regard. It notes the limited number of parking spaces available in and around the region of the Mall (southwest quadrant) where the Costco store has been constructed, but has still not opened. The traffic coming into that portion of the Mall will be carrying customers not only coming to Costco (with/without the gas station), but also to Target and the various businesses in the adjacent portion of the Mall itself. These cars will be competing for a very limited number of parking spaces. Our traffic expert lays out all the numbers, and notes, as have we, that Westfield and Costco have applied for - and been granted - exemptions so they can reduce the number of parking spaces they are required to provide. [Some of the desire to reduce the number of parking spaces that must be provided was presumably to leave more space available for the new Costco store and the anticipated Costco mega gas station.] But now the situation is bordering on the patently absurd.

Attachment B is a portion of page 32 from Costco's Land Use Report. We have expanded it and cropped out the portion that shows the parking area into which customers for Costco (the store and the proposed gas station) will drive; as well as the customers for Target and all the other stores in the adjacent portion of the Mall itself. We have placed a red "A" in the center of this parking domain. Are we really to believe that customers for the various stores will neatly sort themselves (and their cars) into the various clusters of slots that have been assigned to the various stores? Will they do so in an orderly fashion? What about pedestrians - be they people going to the stores from their cars (or returning to their cars after shopping) or simply walking through that area of the Mall on their way to some other part of the Mall (or to the Metro)? As our traffic expert observes, "This circulation of traffic raises the likelihood of a conflict, be it vehicle-to-vehicle or vehicle-to-pedestrian conflict." [Our expert is a professional and is thus not permitted to use terms like "disaster" or "total mess"]. Look again at attachment B and note the red arrow. It shows one of the few routes available to a customer of Costco who, having shopped at Costco decides to purchase gas at the proposed mega gas station. Because cars can only enter the fueling lanes from the ring road side, that customer must exit the parking area, either cross or come extremely close to the ring road, and then turn back to join one of the queues of cars (anywhere from 20-60 are anticipated at/near peak hours). Picture that on a Saturday. Do you require an expert traffic analysis to tell you what will happen? If a traffic expert (ours or Costco's) told you there would be no problem, would you believe that traffic expert? We certainly would not.

Because the above argument as to congestion is based on an attempt to “picture” the future despite and because, given that the Costco store has (as of March, 2013) still not opened, we have no baseline data about likely congestion even when the store has opened, but the gas station has not, we prepared a PowerPoint file as attempt to give some plausible “picture” of the traffic congestion we “see” coming. A pdf version of that PowerPoint “show” is Exhibit G in the packet of Exhibits.

F. Summary and Conclusions

In Sections C-E above we have attempted to guide the reader through the details of Costco's Traffic Impact Anaysis. We indicate that, based on discussions with planning staff and information from our own traffic expert, we accept that the TIA has satisfied the parameters of the study as set forth in the scoping agreement, and to the extent that any TIA is valid in such a situation as presented by S-2863. But we question whether Costco's TIA can be used to evaluate the impact on the non-signalized intersections of concern to residents of the neighborhood, or can address the probability of congestion at a specific critical intersection (#16) along the ring road. Further, we maintain that the TIA does not speak to the level of congestion that is likely to characterize the parking lot area that will be used by customers of the proposed Costco gas station and the other stores in close proximity to Costco. At this point we will simply list the elements of the Code that Costco has failed to satisfy and how it has failed; each item includes the numbering of the relevant section of the Code.

1. It has not satisfied General Conditions 59-G-1.21 (a) (2) because it has not satisfied various parts of the Specific Conditions 59-G-2.06.

2. It has not satisfied General Conditions 59-G-1.21 (a) (4) because it has failed to demonstrate the proposed use is in harmony with the specific character of the neighborhood, in that by its size and mode of operation it will have disruptive impacts by virtue of the additional traffic and traffic congestion it will impose on the neighborhood.

3. It has not satisfied General Conditions 59-G-1.21 (a) (8) because it has failed to prove the absence of adverse effects (inherent and/or non-inherent) on the health, safety, and general welfare of residents, visitors, or workers. The traffic congestion within the relevant Mall parking lot that will be generated by the proposed use will have adverse effects on residents, visitors to the neighborhood (including both the Mall and Kensington Heights), and workers. It will create a safety hazard for pedestrians walking through major portions of the southwest quadrant of the Mall, because traffic flow patterns and pedestrian paths are either too close or are in fact co-incident.

4. It has not satisfied the Conditions specific to automobile filling stations enumerated in 59-G-2.06. In particular it has failed to satisfy:

    a. Subsection (a) (2) as to traffic hazard or traffic nuisance,

We conclude that Costco has not met the burden of proof required by the various sections of the Code and that, therefore, its application (S-2863) should be denied.

ENDNOTES

1. Dr. Adelman has an AB in Biology and a PhD in Biophysics. His CV is available at (http://www.educationalassistance.org/MRA/MRAPersonal/CV.html). He has over 40 years experience in reading and evaluating complex documents and deciding whether the data presented support the conclusions reached.

2. The Stop Costco Gas Coalition was formed in October 2012 by a group of citizen-activists who were concerned that only a small segment of the public was following the Costco mega gas station issue. The SCGC website (www.stopcostcogas.org) has a large amount of information about the application, background material relevant to understanding the Special Exception process, references providing information on citizen concerns, and a listing of the members who have joined the Coalition.

3. The Special Exception process is complex and time consuming. The SCGC website (see endnote 2) has a detailed explanation of the process, as well as the information needed by concerned citizens who may wish to become involved in the process.

4. Throughout this document the terms "we" and "our" are used to convey the notion that the filing is the product of a group of people: the Stop Costco Gas Coalition Coordinating Committee. In fact, while the ideas that form the core of the document (and many of the detailed comments) are the result of a group effort, the final report is essentially the product of one person - the author. The time constraints under which we (as well as other citizens) were compelled to work made it impossible for the group to carry out any meaningful final critiquing/modification of this document (or most of the others we have submitted). Thus any errors in content, format, and/or tone are solely the responsibility of the author.

Attachment A

Questions Regarding Costo's Traffic Impact Analysis (TIA)

This is my initial list of questions. After most of them I have included a parenthetical remark as to why I am asking the question. [I am a scientist and approach the analysis of any complex document accordingly. My questions are not intended to cause you more work, nor do I wish to annoy anyone; but I think about these things as a scientist who is either reviewing (for approval/rejection) a paper submitted for publication, or is reading such a paper because it impacts my research and I need to be sure I trust it before I add it to my "database". I mark up documents as I read them and list my questions in the sequence of the document.] The questions are not prioritized; that comes later. My first few questions are relatively general, while the remainder are very specific.

1. What do the acronyms LATR, PAMR, GLA mean and please confirm that APF means Adequate Public Facilities)? [Costco should have defined these acronyms; these are public documents and interested members of the public should not be put-off by un-defined acronyms.]

2. Have MoCo police and firefighters (both voluntary and paid) provided planning staff with confirmation that they understand the nature of S-2863 and have no problems with the implications of the TIA? [Costco's TIA (p.1) states that they are prepared to provide sufficient evidence as to meeting the APF requirements, but we cannot find any exhibits relating to first responders. The APF requires adequate public safety (police and fire) facilities.]

3. Do Planning Commission guidelines require that the "Summary of Findings and Recommendations" section (pp. 2-3) be duplicated (pp. 28-29) verbatim? [Absent a requirement for this, the duplication is procedurally questionable: citizens reading this section - in duplicate - are likely to be unduly impressed by the findings, many of which (see below) are not substantiated and/or simply misleading.]

4. Why is PAMR (whatever it is) not required? (p.2)

5. Does staff have information on how many users of the WMATA parking garage are Costco members? [The TIA (p.3 and elsewhere) consistently conflates users of the garage with patrons of the gas station. Only Costco members can be patrons of the gas station.]

6. How many entrances off University Blvd. does staff count? [The Costco TIA consistently counts five (p.3 and elsewhere). In the Land Use Report Costco again refers to five entrances to the Mall, and stipulates two off Viers Mill and three off University Blvd. We are aware of only two off University Blvd. The number of entrances and their locations/usage is important to our own TIA.]

7. The TIA refers (p.4 and Exhibit 1D) to removing one lane of the ring road. Can staff determine which lane is to be removed? How will staff evaluate the effect of this decrease in ring road capacity on traffic flow when ring road use is increased by the opening of the Costco store and the proposed gas station? [The TIA ignores this issue, or rather presents it as of positive value because the surface will be used to create a pedestrian path.]

8. Can staff explain block 13 of page 5? [The page (chart?) is not labelled. Block 13 is a computation related to Equivalent Retail Space, but we do not understand the calculation or its significance.]

9. Are the Critical Lane Volume (CLV) standards stated on p. 6 accurate? If so, why is the CLV standard 1800 for the CBD and lower (1600) for the Wheaton/Kensington Policy area?

10. What is the significance of the numbers (white lettering in black dots) in Exhibit 1? [No explanatory legend.] If these are intersections that were studied, why was the intersection of University and Drumm ignored, since that intersection is of major concern to the Kensington Heights community?

11. To what extent is it appropriate for the TIA to use exhibits prepared for S-2794 (now withdrawn) rather than ones newly prepared for S-2863? Exhibit 1B is an example. Other such exhibits (see below) have exceedingly fine print tables, etc. How does staff determine that such tables do not contain information relevant to S-2794 but NOT to S-2863? [NOTE: We are not objecting per se to the use of documents originally prepared for S-2794; rather we are concerned that, by re-using and in some cases modifying such documents for use with S-2863, Costco may have conflated data that was accurate for S-2794 but is not accurate for S-2863.]

12. Exhibit 1C is similarly pertinent to S-2794, but it has the new proposed site corresponding to S-2863 marked out. How does staff evaluate what other elements of this exhibit are/are not relevant to - and accurate for - S-2863?

13. Exhibit 1D is an especially problematic example of the S-2794/S-2863 mis-labelling issue. Exhibit 1D appears to contain a great deal of numerical information. Are opponents of S-2863 expected to go over magnified versions of this exhibit? Will staff be doing this? [At 200% viewing zoom, text in the lower left corner of this exhibit appears to refer to the acoustic/green wall being 8 feet in some places and 14 feet in others. Since the dimensions of the wall have changed between the submissions of S-2794 and S-2683, this is an example of the confusion that arises - but is "hidden" in the conflated Exhibits.]

14. How can staff determine that any numerical data in Exhibit 3 (and others) were in fact determined "fresh" for S-2863?

15. Why, in Exhibit 2, are the intersections of Drumm, Hobson, and St. Paul (with University Blvd.) not labelled at all (they should be labelled as unsignalized intersections)? Was this determined in the scoping agreement and if so, why? [These intersections are major points of ingress/egress for the Kensington Heights community and even very small changes in traffic on University Blvd. have significant impacts on these intersections. Examples include times of major Mall traffic, during/after rainstorms, snowstorms, fog events, etc.]

16. On what day of the week was the intersection data of Exhibit 3 collected? [It would be most useful if the data was collected on a Saturday. If that was not the case, is there any available data that can be used to "fill-in" this gap?]

17. What is the meaning of "Pass-by Trips" (Exhibit 5) and why are these subtracted from the numbers above them to generate "New Trips"?

18. What is the "measurement" difference between Exhibit 6 and Exhibit 3? That is, was some actual measurement used to generate Exhibit 6, or was it created by some sort of calculation based on Exhibits 3 and 5? If so, how was the calculation made?

19. In what sense is Exhibit 7 a sum of actual and background traffic at the indicated intersections? That is, does it represent the sum of actual measurements (Exhibit 3) and projected traffic (Exhibit 6)? And if so, how can the numbers in Exhibit 7 be used to assess what is likely to be the situation, with respect to the various intersections, when the Costco store is actually open and the traffic it generates is added to the other numbers? [One can estimate the number of trips to the Costco store (and perhaps to the adjacent proposed gas station), but estimating how those trips will be distributed amongst the various alternative ingress/egress paths would appear to be extremely difficult in the absence of any actual data.]

20. Does using a value of 30% internal capture, rather than 52% internal capture (p. 20 - in reference to Exhibit 8) strengthen Costco's argument or weaken it?

21. Has Costco provide a siting map for the Columbia store and gas station (p. 20)? Is the siting comparable to that proposed for Westfield Wheaton Mall? [Can staff obtain a copy of this siting information for us to study?]

22. Costco states (p. 20) that the sales expected for the proposed station are 12 million gallons per year annd that this is a "worst case scenario". Does this mean that sales may be higher (better for Costco) or lower (better from our point of view)?

[We have been informed that sales at the Columbia store are approximately 9 million gallons per year. We have also been told that the Beltsville station sells about 12 million gallons per year and that Sterling is higher than that. Thus, we are confused about the reference to the Columbia store as having the second highest volume (this goes to the questions we have asked in the need analysis to try to pin these volumes down). Also, this references a “detailed study” at the Columbia store, but it does not appear that this study was provided in order to quantify the numbers provided. The discussion on page 22 looks at “new” trip generation vis-à-vis traffic outside the mall. However, we believe a further discussion needs to deal with the internal mall trip generation. Because persons will normally park for the store at locations and by routes separate from that used to reach the station and then will need to leave that location and make another drive to the station, those internal mall trips will not have any deduction for the “pass by” or “internal capture” issues. Thus, for homes along the ring road, it would appear that all of this traffic is new. Do you agree?]

23. As to the Queuing analysis (p.21), can you explain if/how this addresses the question as to how many cars are likely to be in one or more queues at times of peak usage? [The data provided appear to address the queuing capacity (42 vehicles) and the 90th percentile values for various elements of queuing, but do not seem to answer the above question.] Queueing data was provided for the Columbia store in April 2012 that indicated that there were extensive queueing lines for many hours in a row. We request that that data be put into the record now and used instead of data from California (which has not been presented in any event). We also believe similar queueing data for Beltsville and Sterling should be included to give comparative indications. Also, we note from page 63 of the Appendix that the trip generation data was obtained from Columbia more than two years ago, and only during the week, not at the peak weekend times. Thus, these values are by no means the highest likely numbers that may be seen.

24. From the values for the Columbia store, and given that the Wheaton station is expected to dispense 1.5 times as much gas (12 million gpy vs. 8 million gpy), are we correct in concluding that the Wheaton station is projected to have 6-9 trucks per day? [Note that the Land Use Report states that the number of fuel deliveries will range from

one to five per day; can staff resolve this discrepancy?] What is the average time for such a truck to dispense its load into the underground storage tank(s)? Can the truck be shut down (no diesel exhaust) for the duration of the dispensing time?

25. How will staff assess the adequacy (viz-a-viz pedestrian safety) of the "new pedestrian path along the ring road" (p.21) that Costco proposes to provide, especially given that the volume of traffic along that portion of the ring road is likely to increase considerably and the available data does not allow a reliable assessment of the extent of traffic congestion that will result? [Also, note the statements about little pedestrian activity ignores the activity of persons parking for the store in the west parking lot and having to contend with exiting traffic from the station moving back to the ring road. Similarly, the “no reason to have much of any pedestrian activity . . . other than those folks that are walking off-site onto the Wheaton property into the Mall for shopping activities.” Leaving aside the fact that the statement ignores pedestrian traffic to the Metro, this simply ignores the very traffic that it is discussing. The sector plan is seeking to promote additional pedestrian traffic within the ½ mile “ped shed.” This station is well within that area.l

26. Exhibit 8 (in conjunction with Exhibit 9A-C) is extremely important, but we have trouble understanding it. Can staff explain the various calculations? In particular footnote 2 refers to "empirical data from Costco" (what does this mean?). The same footnote refers to the PENNDOT letter showing an "internal capture + pass by combined rate of 81%"; how does staff evaluate the significance of this in view of Costco's statement (question 20 above) that it is using an internal capture of 30% rather than 52%?

27. Exhibit 9A has a series of percentage values (white numbers in black dots) around the periphery of the map. [This, as well as 9B and 9C appear to be essential to assessing how the traffic generated by the gas station will be distributed to the road network.] Are we correct in understanding these to be related to projecting the percentages of traffic that will reach the gas station coming from the various indicated "feeder" roads? If so, how were these numbers determined? Appendix C (Trip Assignments for Approved Developments) has a series of similar maps (pp. 63-71) but the percentage values on these maps vary considerably from 9A and amongst one another: only two of these other maps have the same percentage values as does 9A and two have no percentage numbers at all. Can staff help us understand the differences between these various maps?

28. Can staff explain what Exhibits 9B and 9C are used to show? Is there a comparable map in which the numbers in 9A-C are combined along with those in other maps to give a summary of expected traffic at the various intersections if/when the proposed gas station AND the store become fully operational? Is that Exhibit 10?

29. If Exhibit 10 is the summary map, does staff have all the data on the various maps in spreadsheet format so staff can determine that the various numbers have been combined correctly to produce the summary map? [The values at the various intersections, along with the numbers used to determine how customers will reach/leave the gas station are ESSENTIAL to OUR own analysis of the traffic impact of the proposed gas station. We need staff assurance that the values are what we understand them to be and that all numerical data sets have been compiled correctly.]

30. In its Land Use Report, Costco states that the Mall now has 13,500 visitors per average weekday and 17,500 per day on Saturdays. Has Costco given staff estimates on how these numbers will change once the store is open? And, if the gas station

opens after the store opens, how will the numbers subsequently change?

Attachment B

Attachment C