I-255 Gregory A. Lorton

I-255-1 The commenter thanks the County for the opportunity to provide comments on the Draft EIR and explains that the majority of comments are related to air quality, greenhouse gas emissions, and transportation and traffic.

The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

I-255-2 The comment states that even with mitigation the project exceeds thresholds for carbon monoxide (CO), nitrogen oxides (NOx), and particulates (PM_{10} and $PM_{2.5}$) during the construction phase. The commenter asks how the potential impacts of the exceedances are evaluated within the context of the entire project. The commenter asks if the San Diego Air Pollution Control District (SDAPCD) believes that these impacts are acceptable and what steps or measures will SDAPCD impose upon the project.

As explained in Section 2.3, Air Quality,

> "Additionally, as shown in Table 2.3-14, combined emissions from construction and operational activities would exceed the thresholds for NOx, CO, and PM_{10} with blasting and rock crushing activities. Combined construction and operational emissions, without blasting and rock crushing activities, would only exceed the threshold for PM_{10}. Following implementation of M-AQ-2 through M-AQ-4, PDF-1 through PDF-32, and M-AQ-6 through M-AQ-9, proposed project construction and operational emissions would remain significant and unavoidable for NOx, CO, and PM_{10} with blasting and rock crushing activities. Combined construction and operational emissions would remain significant and unavoidable for PM_{10} without blasting and rock crushing activities."

The impacts of the criteria air pollutant emission were evaluated within the context of the entire project, by combining the construction and operational emissions and comparing the combined emissions to the SDAPCD daily thresholds when operation and construction of the Project would occur on the same day.

The Project would be subject to SDAPCD Rule 50 (Visible Emissions), 51 (Public Nuisance), 55 (Fugitive Dust Emissions), 67.0.1 (Architectural Coatings).

I-255-3 The commenter asks how mitigation measure M-AQ-1, lessens the impacts associated with the Project and the likelihood that SDAPCD would modify the regional air quality strategy and state implementation plan to accommodate the Project.

As described in Section 2.3, page 2.3-29 and 2.3-30, mitigation measure M-AQ-1 is provided to ensure population growth and vehicle trips generated from the proposed project are provided to SANDAG for incorporation into the future RAQS update. This update will likely occur following project approval.

Because it is unknown at this time when this update would occur, as the update is not within the control of the County of San Diego or the project applicant, impacts would remain significant and unavoidable following implementation of M-AQ-1.

I-255-4 The comment states that the health risk assessment does not evaluate health risks to residents outside of the project area and that in some cases existing residents are closer to the expanded emission sources than the new resident receptors evaluated in the assessment. The comment states that many of the existing residents are seniors, with an increased sensitivity to air pollutants; therefore, the health risk assessment is incomplete.

The intent of the operational health risk assessment was to determine the health risk impacts associated with the operation of the I-15 Freeway, Deer Springs Road, and the ARCO gas station, to new residents and schools introduced to the project site as part of the project. Therefore, for the operational health risk assessment, off-site receptors and Sarver Lane were not included in the analysis.

I-255-5 The comment states that the Draft EIR does not appear to account for the criteria air pollutant emissions and greenhouse gas emissions associated with the congestion on the I-15.

The County does not concur with this comment. Please refer to O-1.4, specifically Response to Comment O-1.4-52. No further response is required.

I-255-6 The comment states that the Draft EIR does not appear to account for the toxic air contaminants associated with the congestion on the I-15.

Page 9 of Appendix C (Health Risk Assessment) of the air quality technical report (Appendix G of the Draft EIR), states:

> To estimate the I-15 freeway emissions, AADT volumes including the truck percentage were obtained from the California Department of Transportation (Caltrans) for 2013. Emissions were estimated for the closest segment of the freeway that extends from Deer Springs Road to the Gopher Canyon Road

junction. To estimate emissions associated with Deer Springs Road, AADT volumes were obtained from traffic counts by LLG (2014) for the two closest segments of the road to the project site: (1) I-15 to Mesa Rock Road and (2) Mesa Rock Road to Sarver Lane. AADT volumes for these segments are summarized in Table 1. To be conservative, because the freeway is expected to carry a larger percentage of trucks than the local roadways, the same truck percentage traveling on I-15 was used to estimate the truck AADT passing the Deer Springs Road. Based on the 2013 data obtained from Caltrans, the peak hourly traffic on I-15 was 2.1 times greater than the average hourly traffic. Therefore, the peak hour traffic for Deer Springs Road was assumed to be 2.1 times greater than the average hourly traffic, which was then used for the short-term emissions and acute health impact assessments.

The intent of the operational health risk assessment was to determine the health risk impacts associated with the operation of the I-15 Freeway, Deer Springs Road, and the ARCO gas station, to new residents and schools introduced to the project site as part of the project. Therefore, for the operational health risk assessment, off-site receptors were not included in the analysis.

Further, as noted in Appendix R, Traffic Impact Analysis, the proposed Project would add approximately 2,060 ADT on I-15, north of Deer Springs Road (Figure 8-11, Freeway Mainline Daily Project Traffic Volumes). Under the Existing Plus project scenario, the scenario where the proposed project would have the largest contribution to daily trips on this segment of I-15, total freeway mainline segments on this stretch of I-15 are 129,060 ADT. Thus, the proposed Project represents approximately 1.6% of the total volumes on I-15 and would not be expected to contribute to a meaningful increase in TACs to existing nearby residents.

I-255-7 The comment states that the health risks of the increased congestion were not considered for off-site receptors. Please refer to **Response to Comment I-279-6**.

I-255-8 The comment states that the calculations and methodology in the HRA and Air Quality Technical Report are obtuse and opaque. The comment states that the data used for the HRA is not clearly described and that the Report refers readers to the HARP 2 model results, which are difficult to interpret. The comment states that there is no key to allow the reader to determine where a specific location (x and y coordinate) is on a map of the project site, nor is there a table that indicates the total risk at each location and only the maximum risks for each scenario are described.

Appendix C (Health Risk Assessment) of the air quality technical report (Appendix G of the Draft EIR) provides extensive details about the operational health risk assessment, as well as summary information. For example, Table 2 presents a

summary of the roadway emissions and Tables 3 and 4 present a summary of the gas station emissions. Even more detail is provided in Tables A.1 and A.2, which present detailed emissions for all the TACs that were modeled. The resultant unmitigated cancer risk, while not shown in tabular form, is identified on page 16 of the health risk assessment, while the noncancer health impacts, which were found to be less than significant, are summarized on page 21 of the health risk assessment. The unmitigated health impacts are also summarized on page 2.3-52 of the Draft EIR, and the mitigated health impacts are summarized on page 2.3-56 of the Draft EIR.

Regarding the comment about the absence of figures showing the health impacts, Figure 2.3-1 in Chapter 2.3 shows the cancer risk results, and figures in the air quality technical report (Appendix G of the Draft EIR) provide additional information. Isopleths of cancer risk were not generated because receptors were only placed in selected areas, specifically covering the residential areas of the project site and school closest to Interstate 15 and Deer Spring Road (see Figure 4 on page 7 of the health risk assessment). Typically, isopleths can be generated using air dispersion or health risk modeling software. Creating isopleths, however, require a relatively uniform, evenly-spaced receptor grid over a large enough area so that the results are less subject to distortion (i.e., the isopleth lines are free of unusual deformations). In the case of the operational health risk assessment, such a grid was not used as it focused on future residences and the proposed school. As Figure 4 shows, the receptor locations were disjointed. Attempting to generate isopleths using these receptors would not have resulted in an accurate representation of the cancer risks. Nonetheless, Figure 5 of the health risk assessment shows the cancer risk at the school, which was found to be less than 10 in one million at all receptors, and Figure 6 shows the cancer risk for the Town Center, where the cancer risk at receptors in the eastern portion was generally found to be greater than 10 in one million and the cancer risk at receptors in the western portion was found to be less than 10 in one million. In addition, the area subject to mitigation is shown in Figure 7. Noncancer acute and chronic health impacts were found to be less than significant. Thus, no areas of the project would be exposed to significant noncancer health impacts, and no isopleth figure is necessary to portray significant health impacts. The County considers these figures to be a sufficient depiction of the cancer risks to inform the general public.

The remainder of the comment is general in nature and does not raise any specific issue regarding any particular analysis in the Draft EIR. Therefore, no specific response can be provided or is required. (Paulek v. California Dept. Water Resources (2014) 231 Cal.App.4th 35, 47 [a general response is all that is required to a general comment]). This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-255-9 The comment states that there are significant and unavoidable air quality and traffic impacts associated with the Project; however, "no action" is also an alternative and these statements are only presented in the Project Alternatives chapter.

As stated in the Draft EIR, Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines requires that an environmental impact report (EIR) "describe a range of reasonable alternatives to the proposed project, or to the location of the project, that would feasibly attain most of the basic objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(a) also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. However, an EIR need not consider alternatives that are infeasible. There also is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the "rule of reason." The "rule of reason" governing the range of alternatives specifies that an EIR should only discuss those alternatives necessary to foster meaningful public participation and informed decision-making.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the purpose of an EIR's alternatives discussion is to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternatives would impede to some degree the attainment of the project's objectives or be more costly. Further, CEQA requires that an EIR identify the environmentally superior alternative from among the alternatives.

Finally, CEQA does not require co-equal analysis of alternatives as compared to the level of analysis required for the proposed project. Therefore, it is appropriate that analysis of alternatives be considered in the Alternatives chapter only.

I-255-10 The commenter provides information about his background in environmental engineering, chemical engineering, and air quality.

The County acknowledges the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

INTENTIONALLY LEFT BLANK