

January 4, 2016

TO: Darin Neufeld
 Planning and Development Services

SUBJECT: Comments on the draft Environmental Impact Report for LAKE JENNINGS MARKETPLACE, PDS2014-GPA-14-005, PDS2014-REZ-14-004, PDS2014-TM-5590, PDS2014-STP-14-019, LOG NO. PDS2014-ER-14-14-013

1. The San Diego County Planning Commission previously denied a similar version of this project with certain findings. Please address why those findings are no longer applicable.] P-1

2. Air Quality: A new on-site air quality analysis needs to be completed since the data in Table 4 indicate the ambient concentration of CO₂, carbon dioxide, is at least ten times higher than normal. This level of 0.3 is approaching the occupational limit for exposure to carbon dioxide during an 8-hour period.] P-2

3. Aesthetics: A significant and unmitigated impact exists. The above ground power and communication lines negatively impact the visual environment of the area, contribute to visual blight, and are entirely inappropriate with a new commercial development of this size. If the 69KV transmission lines cannot be undergrounded, there is no reason why the other overhead lines should not be undergrounded, reducing the visual clutter. In addition, retaining the 12KV and communication lines will potentially result in topping of the perimeter trees as they mature. The new power poles may also intrude into the pedestrian sidewalks.] P-3

4. Transportation:] P-4
 a. Public Transit- Significant and not mitigated. There is no provision for a bus stop outside of the vehicular travel lanes or bike lanes on Olde Highway 80. Shelters or benches for bus users are not proposed.

b. Page 2.6-19 The following statement clearly identifies a major problem with the proposed project: *"Although the proposed traditional intersection improvements have been determined to be feasible, Caltrans is in the process of analyzing the feasibility of developing full or partial roundabout improvements at these locations, which if implemented, would also reduce the traffic/circulation impact to a level less than significant, should these roundabout improvements be determined to be feasible."*] P-5
 This statement indicates there are impacts that will need mitigation but that the feasibility is still being determined and the mitigation will not be part of the project's conditions of approval. The draft EIR clearly states there are significant and unmitigated impacts that will not be mitigated. This is justification for denial.

Submitted by,
 Janis Shackelford
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Response to Comment Letter P

Janis Shackelford (Letter 1 of 2)
 January 4, 2016

P-1 The currently proposed application for development of the project site stands on its own merits. The findings associated with the previously proposed commercial project are not applicable to the currently proposed project, as a completely new application has been filed and undergone development review by County staff. The currently proposed application is being processed and evaluated by County staff independently of any previous development applications for the subject property.

P-2 The County does not concur that new or additional air quality analysis is needed. The data referenced in Table 4 (Air Quality Conformity Assessment, Final EIR Appendix K) as compared to the Ambient Air Quality Standards is not applicable. Table 4 of the air quality report depicts the results of air quality monitoring samples taken at the project site. The reference to "0.3" is simply the percentage of Carbon Dioxide (CO₂) measured at the project site as compared to the other chemical compounds listed in the table. As shown, the percentage of measured compounds were Free Nitrogen (N₂) (82.6 percent), Free Oxygen (O₂) (15.4 percent), Water Vapor (H₂O) (1.7 percent) and CO₂ (0.3 percent). This equates to 100 percent for the project site. No measurable levels of the other compounds examined were detected.

There is no ambient air quality standard for CO₂ (whereas there is a standard for CO). As shown in Table 4, no CO was detected as part of the on-site ambient air quality measurements. Given these findings, no significant ambient

	<p>air quality impacts are indicated. No respirable 10- and 2.5-micron particulate matter (PM₁₀ and PM_{2.5}) was indicated in the sample. The air quality samples were tested for airborne toxics and processed to determine the relative composition of any toxics of interest. Toxicity screening against the National Institute of Standards and Technology (NIST) spectral database, which contains 191,436 different compounds, indicated no unusual compounds present.</p> <p>The analysis contained within the air quality study and Section 3.1.2 of the Final EIR demonstrates that the project would not exceed SDAPCD major source screening levels for PM₁₀, PM_{2.5}, NO_x, and/or VOCs during the construction phase of the project. In addition, there are no significant impacts identified during the operational phase of the project.</p> <p>P-3 As detailed in Section 3.1.1 of the Final EIR, impacts associated with aesthetics were determined to be less than significant. The power poles and overhead power transmission lines currently exist on the project site, and within the surrounding community; therefore, the proposed project would not introduce new power lines and power poles within the area. With respect to the existing SDG&E power lines and poles that currently traverse the project site, these lines would be relocated from Pecan Park Lane to Olde Highway 80, and the total number of existing poles would be reduced from nine poles to four poles along the project's northerly frontage.</p> <p>The trees selected for the proposed project's landscaping have been approved by the County Fire Marshal and SDG&E and do not grow to heights greater than 25 feet. The proposed overhead lines are greater than 25 feet in height and, therefore, would not interfere with the power</p>
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	<p>lines, nor would they represent a hazard as identified by the commenter. Finally, the proposed power poles will be located behind the pedestrian sidewalks and, therefore, would not impede pedestrian movement in this area.</p> <p>P-4 The proposed project’s impacts to public transit are discussed in Section 2.7.2.3 of the Final EIR. As stated on page 2.7-12 of the Final EIR, the vacation of Pecan Park Lane would result in the relocation of the existing MTS bus stop (Bus Stop ID: 40234). The proposed project would include a new (relocated) bus stop along the project frontage along Olde Highway 80, between Project Driveways 1 and 2 (as shown in Figure 1-1 of the Final EIR). As described in response to comment E-1, the Applicant and the County have agreed to provide one completed bus stop along the project’s frontage (referred to as the “nearside” location requested by MTS), as well as design the site plan and roadway improvement plan to allow for the construction of an additional bus stop near the western boundary of the site if MTS determines it is desirable in the future. In the event that an existing bus stop is temporarily affected by construction within an existing street right of way that has transit service, the contractor shall coordinate with MTS to temporarily relocate the affected transit stop location. Any impacts to area transportation facilities/resources during the construction period of the project frontage are expected to be short-term in nature and, therefore, less than significant in terms of transportation network operations. Please also refer to response to comment E-1.</p> <p>There is no code requirement that requires bus stops to be located out of the traveled way. The MTS “Designing for Transit” manual (1993) states the following:</p> <p>Bus turnouts are widened sections of roadway designed for</p>
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	<p>buses to pull out of the traffic stream. While advantageous to general traffic, turnouts make it difficult for buses to re-enter the flow of traffic. They should therefore be used only under special circumstances.</p> <p>P-5 Proposed mitigation measures would reduce the traffic impacts associated with the project to a level less than significant. The Draft EIR’s conclusion that certain traffic-related impacts would remain significant and unavoidable would only occur if Caltrans required partial, or full-roundabout improvements at the I-8/Lake Jennings Road on- and off- were ultimately determined to be infeasible either due to engineering or environmental constraints, or the timing of the actual improvements. However, Caltrans has reviewed and approved these interchange improvements in accordance with their ICE policy.</p>
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