

I-255 Gregory A. Lorton

Comment Letter I-255

Gregory A. Lorton, P.E.  
8975 Lawrence Welk Dr., #346  
Escondido, CA 92026

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Ashley Smith  
Planning and Development Services  
County of San Diego  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Dear Ms. Smith

Subject: Comments on the Newland Sierra Draft Environmental Impact Report (DEIR)

I appreciate the opportunity provided by the County of San Diego's Planning and Development Services Department to provide comments and ask questions about the Newlands Sierra project planned for the north County area. My comments and questions below focus primarily on the impacts described in the air quality section of the DEIR, and to a lesser extent on greenhouse gas emissions and transportation and traffic.

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1. Even with mitigation, the project significantly exceeds thresholds for carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and particulates (PM<sub>10</sub> and PM<sub>2.5</sub>) during the construction phase. In the third year of construction, NO<sub>x</sub> emissions are well over twice the significance threshold (590.12 pounds per day vs a threshold of 250), CO emissions are over three times the threshold (1,783.41 pounds per day vs 550), and PM<sub>10</sub> emissions are over five times the threshold (516.46 pounds per day vs 100). How are the potential impacts of the exceedances evaluated within the context of the entire project? Does the San Diego Air Pollution Control District (SDAPCD) believe that these impacts are acceptable? What steps or measures will SDAPCD impose upon the project?

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2. The first identified mitigation measure (M-AQ-1) is for SDAPCD to revise their air quality strategy and state implementation plan to accommodate the increased emissions from this project. How does the mitigation measure lessen the impacts of the significant air pollution impacts created by this project? Also, what is the likelihood that SDAPCD would modify the regional air quality strategy and state implementation plan to accommodate this particular project?

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3. The health risk assessment does not evaluate health risks to residents outside of the project area. In some cases, there are existing residents closer to the expanded emission sources than the new resident receptors evaluated in the assessment. Many of these existing residents are seniors, some with increased sensitivities to air pollutants. As such, the health risk assessment appears to be incomplete. Why does the health risk assessment not consider nearby residents? What are the increased cancer and non-cancer risks to these nearby residents?

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4. According to the Transportation and Traffic section, the project will create negative impacts to traffic on I-15. The resulting congestion from increased traffic will increase CO, NO<sub>x</sub>, and PM emissions, all of which are already substantially above significance thresholds. The DEIR does not appear to address increased criteria pollution emissions (primarily CO, NO<sub>x</sub>, and PM<sub>10</sub>), or greenhouse gas emissions (primarily CO<sub>2</sub>) resulting from increased traffic on I-15 caused by congestion due to increased vehicles entering I-15 at Deer Springs Road. This increased traffic will likely also increase emissions of toxic air contaminants from vehicles. Inasmuch as the calculated cancer risks for some locations within the project are already close to the SDAPCD cancer risk threshold (9.1 in a million versus the threshold of 10 in a million) even after mitigation, it is conceivable that incorporating the increased traffic emissions could push these locations above the threshold. Do the toxic air emissions resulting from increased traffic exceed the SDAPCD threshold of 10 in a million?
5. Also, as mentioned above, the health risks of this increased traffic congestion are not considered for existing residents near the project. How do these increased pollutants from increased freeway traffic affect risks both inside and outside of the project area? Similarly, how are existing residents living near the impacted surface roads (e.g., Deer Springs Road and Mesa Rock Road) affected by the increased traffic caused by the project?
6. The calculations and methodology in the Health Risk Assessment (Appendix C) within the Air Quality Technical Report (Appendix K) are very obtuse and opaque, even for an individual familiar with the air quality compliance and human health risk assessments. The description of cancer risks (presented in Section 4.1 of Appendix C in Appendix K) and an equation for determining cancer risk are given, but the description of where the data come from is incomplete, other than referring to the HARP 2 model results in Appendix C of Appendix C in Appendix K. Similarly, the description of non-cancer risks and an associated equation also refers to the HARP 2 model results. However, the HARP 2 results in this appendix are simply a 5,117-page data dump of computer runs for several risk scenarios. The tables are difficult to interpret in that the header rows are not provided on each page. The tables appear to calculate cancer risks and non-cancer risks for each of several dozen chemical compounds and elements at different locations indicated by x and y coordinates within the project site. Presumably, the risks from all of these compounds are summed at each location, although this is not explicitly stated. Further, 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. Also, there is no table that indicates the total risk at each location. Only the maximum risks for each scenario are described. To further the obfuscation, these results include thousands of pages in which the risk from a specific compound is zero at all locations. Rather than describing in a few sentences which compounds contribute zero cancer risk or non-cancer risk in the interest of saving thousands of pages of paper and making the report more user-friendly, the table simply dumps out the entire data set. This reader is left with the impression that the proponent wanted to create as much paperwork as possible in the hope that this would be a disincentive to attempting to understand the health risk assessment. The fact that there are appendices within appendices within appendices furthers this impression.

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7. The EIR claims that emissions that exceed significance thresholds for CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are significant and unavoidable. Similarly, traffic impacts are also significant and unavoidable. However, “no action” is also an alternative. These statements are only presented in the Project Alternatives chapter.

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As a bit of background, I have been a resident of Champagne Village since August 2015. In September 2015, I retired from a 42-year career as a chemical engineer, environmental engineer, and environmental manager. During the late 1980s and 1990s, I worked for Ogden Environmental and Energy Services as the chemical and environmental engineering manager, and participated in the development of numerous environmental impact reports.

I finished my career working for 16 years as an environmental engineer and environmental manager for the U.S. Navy – 10 years as an environmental project manager for contaminated site remediation in the Base Realignment and Closure (BRAC) Program, and the final 6 years as the Air Quality Program Manager for Navy Region Southwest. The Air Quality Program consisted of a group of seven engineers and scientists whose responsibilities included the following:

- Identify and plan for emerging air compliance issues affecting bases in California and Nevada.
- Work to ensure consistent compliance strategies among the bases.
- Work with governmental environmental regulatory agencies for short- and long-term compliance while ensuring fulfillment of the Navy’s military mission.
- Review environmental assessments and environmental impact statements on Navy projects for air quality and greenhouse gas impacts.

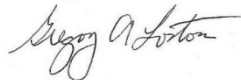
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Within this role, our group worked closely with local, state, and federal air quality regulatory agencies within whose jurisdiction Navy bases were located, including the San Diego Air Pollution Control District. As head of the group, I worked extensively with management at all levels within SDAPCD.

I have a BS and an MS in chemical engineering, an MBA in management, and a DBA in strategic management. Although I am retired, I maintain a current registration as a professional engineer in California in chemical engineering (plus three other states).

Thank you for your consideration and the opportunity to submit comments. If you have questions or need clarification, please contact me at (760) 877-9627 or greglorton@yahoo.com.

Sincerely,



Gregory A. Lorton, P.E.

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