

### I-344 Steven Scriven (3)

**I-344-1** The comment is an introduction to comments on air quality.

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-344-2** The comment introduces the commenter and states there are inconsistencies and troubling wording in Section 2.3, Air Quality of the DEIR. The comment states that many people who live in the area are older and have stated they have health ailments which are aggravated by air quality.

The County notes the comment provides background information and does not raise an environmental issue within the meaning of CEQA. 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 because the comment does not raise an environmental issue concerning the adequacy of the Draft EIR.

**I-344-3** The comment quotes information from the DEIR related to significant, unavoidable air quality impacts.

The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. 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.

**I-344-4** The comment asks if the project applicant will be required to add additional air quality mitigation measures because the measures identified in the Draft EIR do not fully mitigate impacts to air quality.

The County refers the reader to additional mitigation measures considered and added to the Final EIR. The County notes that additional measures may reduce the environmental impacts to air quality; however, the DEIR fully disclosed and analyzed the proposed project impacts to air quality and therefore, the comment does not raise a specific issue pertaining the adequacy of the analysis contained in the Draft EIR. Please refer to the Final EIR, Section 2.3.

**I-344-5** The comment asks if the proposed project would be considered for approval even with significant, unavoidable impacts. The County notes that under CEQA, any

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project with such significant, unavoidable impacts cannot be approved absent the adoption of a statement of overriding considerations in accordance with CEQA. The project proposes a Statement of Overriding Considerations, which is contained in the proposed CEQA findings. Please refer to those overriding considerations for further information.

- I-344-6** The comment states that the Draft EIR finds that impacts for PM<sub>2.5</sub> and PM<sub>10</sub> will be significant and avoidable and questions how the DEIR could find that impacts related to silica would be less than significant when past studies have found there will be grading into a lot of granite that has a high silica/quartz content.

The County refers the reader to page 2.3-49 of the Draft EIR, which analyzes potential impacts due to crystalline silica. As explained on page 2.4-50:

The winds at the project Site are predominantly from the west-southwest; therefore, receptors located east of the project would be most affected by dust from blasting activities. It would take approximately 1 minute for a dust plume to pass by a receptor. The amount of dust inhaled would be limited by the brief exposure and the variability of blasting locations and would result in few repeat exposures that could produce a chronic effect from inhalation of blasting emissions.

Materials that would be blasted at the proposed project are granitic and similar to those blasted at hard rock quarries. The SCAQMD monitored respirable crystalline silica concentrations near the Azusa Rock Quarry and found that average concentrations were 0.5 µg/m<sup>3</sup> or six times less than the REL. This concentration included emissions from blasting and other construction emission sources on-site. Accordingly, concentrations that nearby receptors would be exposed to would be considered acceptable.

In summary, deposited crystalline silica is not considered to be a source of significant health risk and impacts would be **less than significant**. Although impacts would be less than significant, mitigation measure measures M-AQ-12 and M-AQ-12 would be implemented to control fugitive dust emissions generated during blasting activities.

Accordingly, impacts were determined to be less than significant. Please see also Appendix F (Health Effects of Respirable Crystalline Silica in Blasting Dust, Sespe Consulting, Inc. 2015) to Appendix G.

- I-344-7** The comment states PM 2.5 and PM<sub>10</sub> are contaminants that can travel for up to 30 miles and settle into everything. The comment states it is dangerous for wildlife. The

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comment notes Section 2.4, Biological Resources, states there is sensitive wildlife in addition to older folks in the community. The comment states that the DEIR acknowledges significant impacts to air quality from PM 2.5 and PM10 which cannot be mitigated. The comment asks if the proposed Project will be required to provide additional mitigation measures to protect wildlife in the area from air quality impacts.

The County acknowledges the comment and directs the reader to Section 2.4, Biological Resources, specifically page 2.4-59 of the DEIR which defines indirect impacts as:

**Indirect impacts** are reasonably foreseeable effects caused by project implementation on remaining or adjacent biological resources outside the proposed development, roads, and FMZ. Indirect impacts may affect areas within the defined project Site but outside the limits of grading, non-impacted areas, and areas outside the project Site, such as downstream effects. **Indirect impacts include short term effects immediately related to construction activities** and long term or chronic effects related to trail use and development of the project Site. In most cases, indirect effects are not quantified, but in some cases quantification might be included, such as using a noise contour to quantify indirect impacts to nesting birds. (*emphasis added*)

Accordingly, such impacts from construction are considered as part of Appendix H and the DEIR. Specifically, impacts CWA-3 (Existing Core Wildlife Area), SP-3, W-7, V-5, WM-3, and WM-5.

To mitigate these impacts, mitigation measures are described in Section 2.4.15 and include the following mitigation measures:

**Impact SP-3** The significant short-term indirect impacts to summer holly and Ramona horkelia would be reduced to **less than significant** through implementation of mitigation measures **M-BIO-1**, **M-BIO-2**, and **M-BIO-3**, which require biological monitoring during construction, temporary construction fencing, and a biological monitoring report. These impacts have been reduced to less than significant because these measures would prevent and document that construction would not cause additional impacts beyond the project footprint.

**Impacts W-3 and W-7:** Potential significant short-term direct and indirect impacts from loss of County Group I and/or SSC species would be reduced to **less than significant** through implementation of mitigation measures **M-BIO-1**, **M-BIO-2**,

**M-BIO-3, M-BIO-4, M-BIO-5, M-BIO-6, and M-BIO-7**, which require biological monitoring during construction, preparation of a biological monitoring report, biological review of landscape plans, preconstruction surveys for nesting birds and setbacks, revegetation of temporarily impacted areas, and minimizing night and outdoor lighting. Biological monitoring and reporting would ensure that additional habitat is not impacted during construction and that the BMPs outlined in the SWPPP are adhered to. Preconstruction surveys would identify locations of nesting birds and implement construction limitations or provide suitable buffers between these locations and construction. The conceptual landscape plans would demonstrate that native species are being used, thus reducing the potential for invasive species to encroach upon existing native habitat. PDS would confirm use of native species during approval of the final landscape plans prior to grading. Minimizing night and outdoor lighting would reduce disruption of nocturnal wildlife movement and harm to nesting and nursery sites, and monitoring excavated areas and soil piles would prevent entrapment and potential death of wildlife species. Therefore, implementation of these mitigation measures would reduce these impacts to less than significant because the measures would minimize the potential for loss of individuals.

**Impacts CWA-1 and CWA-3:** Significant impact to the existing core wildlife area from construction-related activities that would result from short-term direct impacts would be mitigated to **less than significant** through the implementation of **M-BIO-1, M-BIO-2, M-BIO-3, M-BIO-6, and M-BIO-7**. These mitigation measures require biological monitoring during construction, temporary construction fencing, preparation of a biological monitoring report, revegetation of temporary impacts, and minimization of night and outdoor lighting. Biological monitoring and reporting and temporary fencing would ensure that additional habitat is not impacted during construction, and that the BMPs outlined in the SWPPP are adhered to. Revegetation of temporary impacts would ensure that native vegetation would be restored, thus reducing the potential for invasive species to encroach upon existing native habitat.

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Minimizing night and outdoor lighting during construction would reduce disruption of nocturnal wildlife movement.

**Impact V-5** The significant short-term, indirect impacts to special-status upland vegetation and riparian habitat would be reduced to **less than significant** through implementation of mitigation measures **M-BIO-1, M-BIO-2, M-BIO-3, and M-BIO-12**, which require temporary construction fencing, biological monitoring, preparation and implementation of a SWPPP, preparation of a biological monitoring report, implementation of a fugitive dust control plan, and obtaining permits from the appropriate federal and state agencies. Fencing, biological monitoring and reporting would ensure that additional habitat is not impacted during construction, and that the BMPs outlined in the SWPPP are adhered to. Implementation of the fugitive dust control plan would ensure that impacts related to dust are avoided to the maximum extent possible.

No additional mitigation measures are required or proposed.

**I-344-8** The comment has been combined with the above response.

**I-344-9** The comment refers to the identified significant, unavoidable impacts to and other projects in the City of San Marcos and whether the proposed Project will be required to find new mitigation measures or reassess the proposed Project to reduce affects to air quality.

The County acknowledges the comment and directs the commenter to Section 2.3.6, Cumulative Impact Analysis, which analyzes the potential impacts to Air Quality in combination with cumulative projects. As stated in Section 2.3.6,

“the proposed project’s temporary cumulative construction effects relative to NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be **significant and unavoidable** following project-specific mitigation when considered in combination with reasonably foreseeable future projects under the cumulative scenario.”

Further, the DEIR finds with respect to operational emissions that,

“Even with implementation of PDF-1 through PDF-32 and M-AQ-6 through M-AQ-9, significant reductions in VOCs, CO, PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be required to reduce emissions of these pollutants to less than significant and feasible mitigation measures are not available to achieve these reductions. When

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considered with other potential cumulative projects in the proposed project vicinity, cumulative operational emissions would be considered **significant and unavoidable.**”

Lastly, page 2.3-64 concludes with respect to the Regional Air Quality Strategy and State Implementation Plan that:

“...the proposed project would not be in conformance with the RAQS and SIP until population growth and associated trip generation is incorporated into the next update to the RAQS. 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; therefore, impacts would remain **significant and unavoidable** following implementation of M-AQ-1.”

Accordingly, the DEIR has analyzed the proposed Project at a cumulative level and determined these impacts would be significant and unavoidable. No additional mitigation measures would be available to reduce these impacts to less than significant.

**I-344-10** The comment refers to the sources used for the above comments. No response is required.