

### I-39 Karen Binns (3)

- I-39-1** 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-39-2** The comment asks if there have been any studies on the effects that blasting would have on horses, farm animals, dogs, cats, and birds. This type of analysis is not required to be included as part of a CEQA document. The project did, however, analyze the effects of construction noise on sensitive wildlife species in Section 2.4 Biological Resources.
- I-39-3** The comment asks if a study has been conducted to analyze the effects on farm animals. In particular, the comment is concerned about chickens ingesting residue from blasting and it contaminating eggs. With respect to air contamination due to dust, Appendix F to DEIR Appendix G is a letter report summarizing, “the potential health effects associated with expected respirable crystalline silica emissions from blasting.” Long term exposure to ambient respirable crystalline silica concentrations greater than 3 µg/m<sup>3</sup> causes silicosis and other adverse health effects. However, the DEIR concludes that “[m]aterials 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.” (DEIR, p 2.3-50) As a result, “Dust that is deposited near sensitive receptors is unlikely to result in exposure to respirable crystalline silica because the vast majority of deposited material is too large to be respirable.” (DEIR, p. 2.3-49) In addition, “there are no existing processes taking place or future processes that would take place as part of the proposed project at nearby receptor locations that would reduce the size of particles deposited making them smaller, respirable particles.” (DEIR, p. 2.3-49) Finally, “the small amount of respirable dust that may be deposited would need to be re-entrained into the air in order to be hazardous.” (DEIR, p. 2.3-49)
- I-39 -4** The comment states that the project is claiming to be carbon neutral and asks if this is what the County is referring to in the new Climate Action Plan. The comment also asks if the project will be buying credits to be carbon neutral. As such, mitigation measures M-GHG-1 and M-GHG-2 are provided, which would require the project to offset 100 percent of its annual GHG emissions, for a 30-year period, in order to achieve carbon neutrality (i.e., net zero emissions level). The utilization of carbon

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offsets to mitigate GHG emissions is expressly authorized by CEQA Guidelines sections 15126.4(c)(3)–(c)(4), and would reduce impacts associated with GHG emissions to a less-than-significant level. The County’s CAP is a multi-objective plan that balances environmental, economic, and community interests; implements the County’s General Plan; and aligns with multiple County initiatives. It identifies strategies and measures to meet the State’s 2020 and 2030 GHG reductions targets, and to demonstrate progress towards the 2050 GHG reduction goal. Please refer to **Response to Comment O-16-3** for a discussion regarding the Climate Action Plan and carbon neutrality. Please also see **Topical Responses GHG-1 through GHG-4**.

**I-39-5** The comment asks if the County is going to have a carbon offset fund as part of the CAP where developers can pay into to help new projects meet the requirements under the CAP. The comment asks if this would cause a conflict of interest and what would prevent the County from approving projects that are inappropriate just to receive the offset fee. The County acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Nonetheless, the County refers the commenter to **Response to Comment O-16-3**, above. 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-39-6** The comment states that the Geotechnical Report refers to 2646 Deer Springs Road as 2646 Deer Springs Place. The comment recalls there being an issue with that property in the Merriam Mountains EIR when it was set to be demolished. The comment requests that this be corrected and revised in the Final EIR. The name of the street has been corrected in the Final EIR. Please see Appendix J.

**I-39-7** The comment includes an excerpt from a letter they received from Caltrans, which states that Caltrans does not have an I-15 Deer Springs Road project and that any reference to such a project bearing responsibility for future improvements is incorrect. The excerpt further states that direct impacts from the project are the responsibility of the County and the Developer to fully and adequately mitigate and any work done in State ROW will require Caltrans oversight and encroachment permits.

As it relates to the I-15/Deer Springs Road interchange, the project has identified feasible mitigation in the form of building a new interchange and that mitigation measure is identified in the Draft EIR as M-TR-1. The process of implementing the mitigation for the interchange is detailed in the Draft EIR at Chapter 2.13. Please also see **Topical Responses TR-1 and TR-2**.

**I-39-8** The comment states that the project should not move forward until the interchange is redesigned and improved. The County acknowledges the comment and notes it

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- expresses the opinions of the commenter, and 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.
- I-39-9** The comment states that they feel that this project is “leap frog” development. The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Please also see Appendix DD to the EIR, Land Use Consistency Analysis, including the County’s General Plan Policy addressing “leap frog” development. 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-39-10** The comment asks how the SDCWA aqueduct will be affected during construction because the aqueduct will run through Sierra Park. The comment asks what mitigation would be required so as not to damage the aqueduct with heavy equipment. The comment also states that the aqueduct goes through their property and they are concerned that if it’s damaged then their property will be dug up. The County acknowledges the comment and refers the commenter to the Preliminary Grading Plan, specifically Sheet 13 of 17, which identifies the existing easement and states “Caution: Existing 66” CWA Line, Protect Per CWA Requirements.” The grading for the P14 park would match existing grades over the water line per the request of SDCWA, therefore, it is not anticipated that any excavation would have the potential to impact the water line. Additional construction details will be provided as part of the project Improvement Plans.
- I-39-11** The comment states that the green waste facility in Sierra Farms Park needs to be moved to the center of the project where the green waste will be generated rather than infringing on the neighbors. The comment also asks when the bins will be emptied, will the waste be taken off site, and if noise levels have been studied for grinding activities. First, the plans presented in the Specific Plan are conceptual and subject to subsequent Site Plan review. Second, the park would have to comply with all applicable mitigation measures and project design features. Third, chipping and grinding of wood would be the primary sources of potential noise generation at the green waste area. Noise from the green waste area would be required to comply with the County’s Noise Ordinance per Section 36.404 for daytime and nighttime noise levels. The FEIR has been revised to note that such activities would be required to comply with applicable requirements from the County Noise Ordinance. As stated in Chapter 1.0 Project Description, under PDF-28, the green waste area shall be

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maintained by the HOA. 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-39-12** The comment states: “In the Biological Technical Report there are 16 maps with no names. All they say are “Puddles.” Why aren’t they named and why isn’t the location noted? Is this in regards to the ‘fairy shrimp’ issue?” As stated in Section 2.4, Biological Resources on page 2.4-29, the Site does not support vernal pool habitat and all features mapped within the project Site have been categorized as puddles. 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-39-13** The comment asks what mitigation will be provided for the three new cultural sites that were found. As stated in Section 2.5, Cultural Resources on page 2.5-2, “the project’s APE contains eight cultural resource archaeological sites and two isolates. Although most of these sites have been disturbed by past activities or otherwise do not qualify as significant for the purposes of CEQA, three of the sites (CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822) were determined to be “unique archaeological resources,” and are, therefore, subject to additional environmental review under CEQA. Portions of each of these three sites would be affected by project-related construction. Consequently, the project may have a significant impact on each site, requiring either avoidance or mitigation. The data indicate that the significant portions of site CA-SDI-4558 can be avoided, but that it is not feasible to avoid or preserve in place site CA-SDI-5951 or CA-SDI-9822, as they are located within an area that is intended to accommodate the proposed widening of Deer Springs Road. Impacts to these sites would be mitigated to less than significant via Phase III data recovery efforts pursuant to an approved treatment plan.” 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-39-14** The comment states that it is incorrect to categorize Stephen’s Kangaroo Rat as a species with “low potential or not expected to occur,” because they have seen them frequently... The County refers the commenter to Appendix G of Appendix H, Wildlife Species with Low Potential or Not Expected to Occur, which notes that “No appropriate habitat on site. Numerous occurrences documented approximately *10.5 miles southeast* and *5 miles northwest of project site* (CDFW 2014; USFWS 2014a).” (emphasis added)

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The County notes the comment does not provide any evidence of observing Stephen's Kangaroo Rate and; therefore, the County cannot provide a more detailed response. 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.

- I-39-15** The comment states that the Biological Technical Report concludes that the development is expected to lead to a decrease in human activity on the project site. The comment asks how this is possible. As stated in Section 2.4, Biological Resources, on page 2.4-96, "the Site is currently subject to illegal/unauthorized activities, including hiking, biking, off-road-vehicle activity, parties, trash dumping, homeless population activities, and camping. With the project and associated open space preserve, all of these activities except the biking and hiking would cease, and hiking/biking would be managed and kept to select trails. To protect the proposed open space easement from unauthorized entry or disturbance, both permanent post and rail fencing, along with walls and strategic placement of signage shall be installed approximately every 200 feet. The illegal trails would be closed and new trail creation (which currently occurs) would potentially stop. Therefore, the proposed development is expected to lead to a decrease in human activity in the open space areas of the project Site." 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-39-16** The comment states that the Crystalline silica report is totally inadequate. The County acknowledges the comment and notes it expresses the opinions of the commenter, and 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.
- I-39-17** The comment states that the Draft EIR needs to be revised and recirculated. The County acknowledges the comment and notes it expresses the opinions of the commenter, and 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.

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