

RESPONSES TO PUBLIC COMMENTS

The County received numerous comments on the proposed project and the various technical reports that were prepared to assess the project's impacts. Although neither Public Resources Code section 21083.3 nor CEQA Guidelines section 15183 require the County to respond to public comments, the County provides the following subject matter responses to the topics and issues raised in the public comments.

1. Aesthetics/View Impacts

The project's impacts on Visual Resources were addressed in a Visual Resources Impact Report, posted on the County's website as Appendix B. In that report, the project's potential impacts to visual resources were analyzed from six key views. The analysis concluded that viewer exposure to the Project, which would be located on an existing flat area surrounded by steep slopes, would be minimal due to the existing topography, the Project design and existing features, as well as screening by and blending with maturing native vegetation and landscaping. Visual impacts on the traveler along I-15 and other public roads will be below the level of significance. The proposed structures will not be out of scale with or dominate existing views. Nor will the project disrupt the continuity of the topography or community character of the area. In this location, the community character is one of transitional land uses, including open space and residences interspersed with commercial uses, such as an ARCO gas station, a winery and tasting room, a golf driving range, two retail nurseries, a soil amendment operation, a large retail outlet that sells outdoor patio furniture and fountains, and a storage facility immediately east of I-15. Note also that views in this area are generally dominated by I-15 itself.

Ultimately, the Visual Resources Impact Report concluded that the Project would not have significant visual impacts because: (i) views are transitory from the I-15 freeway and the Project is located above the roadway grade, and thus there will be no substantial adverse effect on a scenic vista; (ii) no physical changes to I-15 are proposed, and thus no substantial damage to scenic resources will occur; (iii) the Project is set back from I-15, and thus largely blocked from view by existing topography and surrounding vegetation; and (iv) design measures will incorporate existing topography, existing vegetation, and landscaping with native plants to effectively screen the Project. The Visual Resources Impact Report also concluded that while residents located east of the project site (i.e., on the other side of I-15) would be able to view the project site, the impacts would not be significant. Therefore, no mitigation is required. Other aesthetic/visual issues are addressed below:

- Some comments expressed disagreement with the County's conclusion that the proposed project will not have visual impacts that are "peculiar" as defined under Public Resources Code section 21083.3(b) and CEQA Guidelines section 15183. These comments assert that the project will have significant impacts on the views currently enjoyed by the residents of the Montreux residential subdivision. As explained in the County's Statement of Reasons and section 15183 checklist, the project was subjected to an

extensive visual impact assessment to determine if it would result in adverse visual effects not otherwise considered in the 2011 GPU EIR. That assessment determined that the project would be located approximately 80 feet above I-15 and set back from the site's east-facing property, thus greatly reducing the extent to which it would be visible from public vantage points. This same assessment showed that the project's landscaping would further screen the recycling facilities from public view. With regard to impacts on views from private residences, such impacts are typically not considered significant under CEQA. (*Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 493-494.) As stated by the court in *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego* (2006) 139 Cal.App.4th 249, "obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact," because under CEQA, "the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons. (*Banker's Hill v. City of San Diego, supra*, 139 Cal.App.4th at 279.)

- One comment argued that the proposed project will have significant lighting impacts on local residents, including those across I-15 in the Montreux residential development. The comment provides no evidence in support of this assertion. The County has determined that the project's light and glare impacts will be minimal and more importantly, will be adequately controlled by the County's Light Pollution Code and Zoning Ordinance, with which the project must comply.
- The City of Escondido ("Escondido") commented that the 39-lot High Point residential development (Escondido Tract 683-J) is located just west of the project site and "provides many direct sight opportunities into the proposed industrial project site." Escondido states that such views from the High Point development would be adversely affected by the Project. Escondido's comment letter indicates further that the High Point development consists of graded pads, not homes, at this particular point in time. When the County adopted the 2011 GPU and designated the project site as Heavy Industrial (I-3) and zoned it M54, it did so knowing that the property to the west was designated by Escondido for rural residential uses. Thus, the County 2011 GPU and attendant EIR considered the impacts of placing an I-3/M54 land use (the project site) adjacent to a property identified in the Escondido general plan as rural residential. (See 2011 GPU EIR, Land Use, Section 2.9, pp. 2.9-34, 2.9-38, 2.9-48, and 2.9-52 (Map of City of Escondido Sphere of Influence)). Consequently, there is nothing peculiar about the project's view impacts on the High Point development. Further, Escondido has provided no evidence showing that the High Point residences, which do not yet exist, will, in fact, have unobstructed views into the recycling center. Nor did Escondido provide evidence that such views would be adversely affected to a significant degree by the proposed project. Finally, as mentioned above, CEQA does not require a lead agency to assign the same level of significance to *private* views as it does to *public* views. (*Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 493-494.) As stated by the court in *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego* (2006) 139 Cal.App.4th 249, "obstruction of a few private views in a project's

immediate vicinity is not generally regarded as a significant environmental impact,” because under CEQA, “the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons. (*Banker’s Hill v. City of San Diego, supra*, 139 Cal.App.4th at 279.) In this instance, the County does not find that the project’s impacts to views are significant.

- A number of comments have questioned whether the project would eliminate or disturb the “Bear Rock” formation located at the project site, asserting that such an impact would be “peculiar” to the parcel (and thus disqualify the project from the proposed exemption). However, no such impact is expected to occur because the project will avoid Bear Rock and leave it in its current condition. Moreover, the Project is located considerably downslope of Bear Rock and will not impede or adversely affect views of Bear Rock.
- Once commenter stated that storage structures on the project site required greater setbacks to reduce their visibility. Further setbacks, however, are not required, as the storage units would be situated on the site consistent with the County’s setback standards.

2. Air Quality/GHG Impacts

The June 2019 Air Quality and Greenhouse Gas Assessment, prepared by Dudek, analyzed potential air quality and greenhouse gas (GHG) impacts from construction and operation of the Project. The Assessment concluded that the Project would not conflict with or obstruct the implementation of local air quality plans because (i) the Project is consistent with the County of San Diego’s General Plan land use designation and (ii) land use designations under local general plans are accounted for in local air quality plans, State Implementation Plan, and Regional Air Quality Strategy.

For estimation of construction emissions, the Air Quality assessment assumed that heavy construction equipment would be operating at the site for up to 8 hours per day, 5 days per week during project construction, a 634-square foot covered patio would be demolished as part of the Project, and blasting operations would be required for processing rock onsite. Construction activities would be subject to fugitive dust control measures (including a dust management plan that will be incorporated as a condition of project approval), which would limit fugitive dust that may be generated during grading and construction activities. The estimated maximum daily construction emissions were determined not to exceed the County’s screening level thresholds for any criteria pollutant during construction in all construction years.

Emissions generated during the operation of the Project were estimated from landscape maintenance, energy sources, mobile sources, and off-road equipment. Air emissions modeling showed that the estimated maximum daily emissions resulting from the operation of the Project would not exceed the County’s threshold for each of the air pollutants. Project design features such as a Dust Management Plan, an Odor Impact plan, and Best Available Control Technology would be incorporated as conditions of project approval to ensure air quality impacts during project operation would remain less than significant.

With respect to evaluating exposure to sensitive receptors, the closest receptor to the Project is a residence 620 feet to the south. Due to the steep terrain between the Project and that closest receptor, and the prevailing wind direction, no toxic air contaminants are expected to impact the closest receptor. No CO hotspots will be formed because the Project will not add trips to any intersection operating at Level of Service (LOS) E or F. (Air Quality Assessment, p. 19.) The Air Quality assessment found that the Project will contribute minimally to criteria air pollutants during construction and operation and thus will not result in a significant impact on human health.

With regard to odor impacts, the Project would implement an Odor Impacts Minimization Plan and numerous project design features, which will make the odor impacts less than significant.

- Some comments questioned whether the proposed project would result in significant or peculiar greenhouse gas (GHG) impacts. To address this issue, an Air Quality and Greenhouse Gas Emissions Assessment was prepared. This assessment concluded that the proposed project's GHG emissions for both construction and operations, would not exceed 900 metric tons of carbon dioxide equivalent (MT CO₂E) per year, which the California Air Pollution Control Officers Association (CAPCOA) recommends as a "screening threshold" when evaluating whether a project would impede the State's GHG reduction goals under AB 32. (Air Quality and GHG Assessment, pp. 28-29.) Specifically, the GHG Assessment determined that the proposed project would emit 378 MT CO₂E per year, including both amortized construction emissions and annual operation emissions, well below the 900 MT CO₂E per year screening threshold. (pp. 35-36.) In addition, the proposed project, as a facility that recycles construction debris, furthers the County's objective of intercepting construction and demolition waste, diverting it away from landfills, and converting it into repurposed materials. (See 2017 Strategic Plan to Reduce Waste, pp. 1-2, 34-35.) Note that the 2017 Strategic Plan to Reduce Waste is part of, and incorporated into, the County's 2018 Climate Action Plan. The assessment also found that the project created no inconsistencies with the County's Climate Action Plan. (See CAP Checklist, as posted on County website.) No comment received by the County has presented substantial evidence to support a contrary conclusion.
- Some comments expressed concern that the project's air quality impacts would cause health effects (COPD, asthma, etc.). The Air Quality Assessment, however, determined that the project's emissions of regulated air pollutants, including particulate matter (PM₁₀ and PM_{2.5}), were well below County screening standard and state and federal ambient concentration thresholds. For these reasons, the Air Quality Assessment determined the project would not have a significant impact on human health. County staff concurred in this determination.
- A number of comments expressed concern that the project would generate PM₁₀ and PM_{2.5} emissions in violation of established, local, state, and federal standards. The Air Quality and Greenhouse Gas Emissions study assessed this issue and determined that the

proposed project, during the construction phase would generate 13.56 pounds per day (ppd) of PM₁₀ and 6.91 ppd of PM_{2.5}. These emissions are well below the County thresholds for these two pollutants (100 pounds per day for PM₁₀ and 55 pounds per day for PM_{2.5}). Therefore, the project's construction emissions of these pollutants would not be significant. With respect to the project's operational emissions, the Air Quality and Greenhouse Gas Emissions study found that the proposed project would generate 32.35 ppd of PM₁₀, which is well below the County threshold of 100 ppd, and would generate 7.78 ppd of PM_{2.5}, also well below the County threshold of 55 ppd. These facts establish that the proposed project would not result in significant PM₁₀ or PM_{2.5} emissions.

- Some comments expressed concern regarding dust impacts on neighboring properties. However, based on the Air Quality Assessment, which showed that the proposed project would not exceed the thresholds for PM₁₀ or PM_{2.5} – both of which are dust-related pollutants – the County has concluded that the proposed project's dust impacts would be less than significant. Note also that the project would have to comply with Rule 55 of the San Diego County Air Pollution Control District (Fugitive Dust Control) as a condition of approval.

3. Biological Resources Impacts

One comment asserted that the proposed mitigation measures for the project's biology impacts are not specific enough or included in the conditions of approval. As explained in the Section 15183 Checklist, the project's impacts are consistent with those considered in the 2011 GPU EIR and are subject to the mitigation measures the County adopted when it certified that EIR, specifically BIO 1.5 and Bio 1.6. In addition, the project will mitigate its impacts through on-site and off-site preservation. Finally, the project will also require a Habitat Loss Permit (HLP) for impacts to Diegan coastal sage scrub, mafic southern mixed chaparral, and other vegetative communities. The HLP sets forth specific mitigation ratios for impacts to each habitat type. The HLP and the other County-imposed mitigation measures provide specific, well defined, and sufficient mechanisms to reduce the project's biological impacts to less than significant.

One comment requested that the County impose additional mitigation for the project's biological impacts on grounds that portions of the project site had been illegally graded in the past. The County finds no CEQA justification for imposing mitigation over and above what is required under the proposed Habit Loss Permit (HLP). As explained, in the draft HLP, the applicant must mitigate at a 3:1 ratio the Diegan coastal sage scrub that was lost through unauthorized grading and mitigate at a 4:1 ratio the mafic southern mixed chaparral that was lost through unauthorized grading. Both mitigation measures are consistent with the mitigation measures the County adopted when it certified that 2011 GPU EIR, specifically BIO 1.5 and Bio 1.6.

4. Fire-Related Impacts

Some comments contended that the project constitutes a fire risk and may increase the likelihood of wildland fires. These issues were addressed in the Fire Protection Plan (FPP) for the project, which was reviewed and approved by the Deer Springs Fire Protection District (DSFPD). Per the FPP, the project applicant must install and maintain a water tank of at least 20,000 gallons that meets the requirements and specifications of the DSFPD. The applicant has decided to install a water tank with a 100,000-gallon capacity, exceeding this requirement. The water tank must also include a fire department connection consistent with County Fire Code section 903.3.2 and County policy.

In addition, the project applicant must install fire hydrants at locations determined by the Fire Marshall to meet operational needs, as set forth in County Fire Code Table 903.4.2-B. The FPP also dictates the location, dimensions, and conditions of fire access roads. The project, per the FPP, must use ignition resistant materials for all buildings and install an automatic fire sprinkler system that complies with NFPA 13 standards and includes a “Knox Box.” Finally, the FPP requires that the project create and maintain a “defensible space” around the facility. That defensible space must include a fuel break of 100 feet where brush and weeds have been cleared away from structures and 30 feet from the edge of the access road. These measures are intended to ensure that the project is not a source of fire ignition. For these reasons, the County concludes that the project did not pose a peculiar or significant wildfire risk.

5. Hazardous Materials Impacts

Some comments expressed concern that the proposed project could result in the handling and discharge of hazardous materials, including asbestos. As explained in the Section 15183 Checklist, the proposed project will not accept, handle, process, dispose of or produce asbestos or any other hazardous material or hazardous waste. To ensure no hazardous materials are processed at the facility, the project will implement a Hazardous Materials Program and Hazardous Load Check Program. The project will also be subject to regulatory oversight by the San Diego County Department of Environmental Health, Hazardous Materials Division.

6. Hydrology/Water Quality Impacts

Some comments questioned whether the proposed project would cause peculiar or significant impacts on hydrology and stormwater runoff. The County required the applicant to conduct a Drainage Study for purposes of demonstrating the project’s ability to comply with the County’s current Municipal (MS-4) stormwater permit and Watershed Protection Ordinance (WPO). That study, which showed the project could achieve MS-4 and WPO compliance, also includes a Stormwater Quality Management Plan (SWQMP), which was reviewed by County staff and found to be adequate. Based on these facts, the proposed project is not expected to cause peculiar or significant hydrological or stormwater impacts.

One comment questioned whether the proposed project would result in significant deposition of silt into local waterways. The aforementioned Drainage Study and SWQMP demonstrate that the Project will control discharge of silt/sediment to the extent required under the County's MS-4 permit. Specifically, the SWQMP requires that the applicant implement site design measures, source control Best Management Practices (BMPs), and/or structural BMPs (including installation of bio-retention basins) to reduce potential pollutants, including sediment, from being discharged to local drainages and waterways. The SWQMP would ensure that the project complies with County's WPO as well.

A number of comments sought clarification regarding how the project's water demands would be met. As indicated in the Statement of Reasons, the project would receive its water from the Vallecitos Water District, which has provided the County with a Service Availability Letter, indicating that it has sufficient water to supply the project. Note that while the project initially intended to supply a portion of its water needs through on-site groundwater pumping, the applicant has since decided to secure all water from the municipal water purveyor, i.e., Vallecitos Water District.

7. Land Use Impacts/Zoning Consistency Impacts

One comment asserted that the County's review of the project is inadequate because it addresses the applicant's intended use rather than the "maximum permitted use." The applicant determined the scope of the proposed project by setting forth a project description. The project description then forms the basis of the County's analysis of the potential impacts from the proposed project, while conditions of approval will ensure the project's operations do not exceed this proposed scope.

A number of comments contended that the project is "peculiar" because it proposes an industrial use on a parcel that is adjacent to land with residential land use designations. It should be noted that the project site was designated and zoned for heavy industrial uses as part of the 2011 GPU.

A number of comments stated that the project site is an inappropriate location for a construction debris recycling facility. As stated above, the project site has been designated and zoned for industrial uses since 2011, when the County approved the General Plan Update.

Numerous commenters asserted that the proposed project would cause their property values to drop and asked the County to evaluate this impact. CEQA, however, does not recognize changes in property values as an environmental impact and thus does not require that it be analyzed.

One comment asserted that while the Acoustical Study and the County's Statement of Reasons claim that the project will export 48 tons of material per day, resulting in only two outbound truck trips per day, the Statement of Reasons also states that the proposed project could lawfully be permitted to "export" up to 174 tons of finished product per day, requiring eight truck trips. This is not correct. The Statement of Reasons indicates that current

regulations allow recycling facilities to “*process*” – not “*export*” – 174 tons of C&D Wood debris and/or CDI debris per day. (Statement of Reasons, p. 2.) This is not a daily maximum for this particular project, but the maximum allowed at any Medium Volume Construction and Demolition/Inert Debris Processing Facilities in the County. (See 14 Cal.Code Regs. §§ 17381(t) and 17383.5.)¹ The proposed Project would stay well within this *processing* maximum. More importantly, the proposed Project would “*export*” approximately 48 tons (average) of finished product per day, requiring two truck trips per day. (Statement of Reasons, p. 2.) Thus, the acoustical analysis, traffic study, and air quality and greenhouse gas memorandum used the correct assumptions for purposes of assessing the Project’s impacts.

Some comments questioned whether the proposed project is consistent with the land use and zoning designations that apply to the site. As explained in the Statement of Reasons, the project site has a land use designation of High Impact Industrial (I-3) and a zoning classification of General Impact Industrial (M54) with a “B” Special Area Designator. Pursuant to these designations and classifications, the proposed recycling facility is authorized as a matter of right and does not require a general plan amendment, zone change, or use permit.

The City of Escondido (“Escondido”) commented that it is concerned about the subject property’s High Impact Industrial (I-3) land use designation and M54 zoning classification. Escondido then commented that the project site is within its sphere of influence and is designated as rural residential in the Escondido General Plan. According to Escondido, its preferred land use and zoning designation for the site is more consistent with the surrounding development pattern than the land use and zoning imposed by the County. It is important to note, however, that the subject property lies within the land use jurisdiction of the County, not Escondido, and is thus subject to the County’s General Plan and zoning code, not those of Escondido. Moreover, the site has been designated and zoned for industrial uses since 2011.

8. Noise/Vibration Impacts

The noise impacts of the construction and operation of the Project have been analyzed in the Noise Assessment Report, prepared by Ldn Consulting, Inc., and Supplementary Noise Technical Analysis, prepared by Dudek.

The Supplementary Noise Technical Analysis, dated May 2019, assessed worst-case conditions by modeling the noise generated by the two pieces of equipment with the highest continual noise levels operating simultaneously. Based on this modeling, the Noise Technical Analysis determined that the Project would not result in any significant noise impacts.

In addition, the Noise Technical Analysis found that the Project would have no significant groundborne noise or vibration impacts during either construction or operation. The analysis

¹ 14 Cal.Code Regs. Section 17381(t) defines “Medium Volume Construction and Demolition/Inert (CDI) Debris Processing Facility” as a site that “receives at least 25 tons per operating day and less than 175 tons per operating day of any combination of C&D debris and Type A inert debris for the purposes of storage, handling, transfer, or processing.”

also determined that Project Design Feature PDF N-1, incorporated as a condition of approval, would ensure that any vibration impacts due to blasting would be less than significant.

Additional responses to more specific noise and vibration comments are provided below:

- A number of commenters stated that local atmospheric/meteorological conditions – such as wind, temperature, and humidity – could amplify noise levels. By way of response, while it is true that such conditions can occasionally amplify noise, they can also dampen noise. More importantly, such conditions are highly variable, uncertain, and often short-lived, which makes them difficult to measure or include in a noise model or calculation for a given project. It should be kept in mind, however, that the primary factors for determining sound levels at a given location are *distance* from the noise source and intervening *topography*. Thus, distance measuring, coupled with an assessment of intervening topographical features, is the accepted methodological approach used by acoustical experts when assessing noise levels, and is also consistent with the County’s guidelines for determining the significance of noise impacts. This is the methodology used in this case. Atmospheric variables are not likely to have a material impact on the noise levels determined through the distance calculation.
- One comment stated that the acoustical analysis should have assumed that the project’s wheeled loader, dump truck, tab grinder, trammel screen, and crusher were all operating simultaneously. According to the comment, this is the only way to conduct a “worst-case” analysis. As noted in the acoustical analysis, the noise model assumed that the two pieces of equipment with the highest continual noise levels would operate simultaneously. Such an assumption does, in fact, constitute a worst-case scenario because, due to the low amount of product throughput at the project site and a small work staff, no more than two (2) pieces of equipment would be operating during any one-hour period.
- Some commenters stated that the proposed project would generate significant amounts of noise and violate certain provisions of the County Noise Ordinance. The Acoustical Analysis determined that due to (i) the low number of trucks entering and exiting the project site; (ii) operational constraints of the recycling facility; (iii) ridgelines and other topographical features that are located between the facility’s equipment and residential uses; and (iv) the lot line boundary adjustment that puts greater distance between the facility and land zoned for residential uses, the project would not generate noise in excess of any standard set forth in the County’s Noise Ordinance.
- Numerous comments expressed concern that blasting associated with construction of the project would disrupt local residents. According to the Acoustical Analysis, blasting would not take place within 400 feet of noise-sensitive or vibration-sensitive land uses. This will be a condition of project approval. In addition, all blasting activities must be conducted in a manner, and with the necessary controls, to comply with the San Diego

County Noise Ordinance, including the noise levels set forth in Section 36.409 and 36.410.

- Numerous comments asserted that the project, by starting its daily operations at 5 a.m., would violate the County Noise Policy N-5.2. However, Noise Policy N-5.2 provides that noise-generating industrial facilities be located at the maximum practical distance from residential zones, and that setbacks should be imposed between noise generating equipment and sensitive uses. The proposed project is consistent with this policy, as evidenced by the information set forth in the Acoustical Analysis. Policy N-5.2 also provides that the County should “limit the operation of noise generating activities to daytime hours as appropriate where such activities may affect residential uses.” The project is consistent with this Policy as well. Specifically, the Acoustical Analysis shows that the project noise levels would not exceed daytime or nighttime noise thresholds for those residential uses located nearest the project site. For example, the Acoustical Analysis determined that the project’s operational noise levels would be below the nighttime threshold of 57.5 dBA at all surrounding properties where residential uses are allowed, with one exception.² That exception is the Caltrans parcel directly east of the project site, which is planned and zoned for residential use. Project-related noise at that location would be 58 dBA, just above the 57.5 dBA threshold. However, the Caltrans parcel, which is zoned A-70 (Limited Agricultural), is located immediately west of I-15 and is on a steep slope. Due to Caltrans’ ownership of the parcel, and its steep slope, it is unlikely that residential uses would ever be placed on this property. Moreover, because the Caltrans parcel is located immediately adjacent to I-15, traffic noise from the freeway has the potential to mask the noise coming from the project. Specifically, while project-generated noise at the Caltrans parcel could reach 58 dBA, freeway noise at the Caltrans parcel are estimated to range between 69 and 78 dBA at most times of the day, based on standard noise assumptions for roadways with more than 10,000 average daily trips. (See email from Mike Greene, certified Acoustician, dated April 22, 2020, forwarded to County staff on April 23, 2020.) For all the reasons discussed above, the project would not have a significant noise impact. Note also that the project is consistent with the County’s Noise Ordinance.
- The City of Escondido commented that operation of the proposed project could have significant noise impacts on the High Point residential development west of the project site. According to the Acoustical Analysis, the project’s operational noise levels at the boundary of the biological open space west of the recycling facility would be 64.7 dBA, which is below the County’s industrial noise standard of 75 dBA. In addition, the High Point property line is located another 750 to 800 feet west of the project/biological open space boundary. Thus, after accounting for distance-related sound attenuation, the sound levels at the High Point property line would be substantially less than 64.7 dBA and would not exceed County standards. This is not a significant or peculiar impact.

² The nighttime threshold was used because the project will operate from 5 a.m. to 7 p.m., and two of those hours – 5 a.m. to 7 a.m. – fall within the definition of “nighttime” for purposes of regulating noise.

- The Acoustical Analysis also determined that residential uses to the east of the project site, all of which are located more than 1500 feet away, would not receive project-related noise in excess of County standards.

9. Odor

Numerous comments expressed concern that the proposed project would create odors that neighboring residents and landowners would find offensive. As state above, the project would only process construction debris not household refuse. Therefore, the risk of offensive odors is low. Nevertheless, because the NCER facility will accept and process tree waste, it has the potential to generate odors that neighboring residents might find offensive. Though the potential for this impact is low, the County has required that the applicant prepare and implement an Odor Impacts Minimization Plan (OIMP) that complies with Title 14 California Code of Regulations, Division 7, Chapter 3.1, section 17863.4. This OIMP shall include an odor monitoring protocol, identification of potential odor receptors, a description of meteorological conditions that would affect the movement of odors, a response protocol, and design considerations intended to minimize odors. The County has concluded that with implementation of the OIMP, along with subsequent incorporation of odor-reducing/odor-avoiding Best Management Practices, the project will not result in significant odor-related impacts.

10. Traffic/Road Safety Impacts

In the Preliminary Traffic Assessment prepared by RBF, the County analyzed daily traffic volumes, roadway segments, and peak hour intersection operations, to determine traffic impacts from the Project. It concluded that the Project generated trips would be below the County's minimum threshold and significance criteria. The Project will be subject to the payment of Traffic Impact Fees addressing cumulative impacts that may occur in the vicinity of the Project site.

- Numerous comments expressed concerns over the traffic impacts of the proposed project. The County investigated this issue and made the following determinations:
 - The project, including anticipated truck traffic, would generate 110 passenger car equivalent (PCE) average daily trips (ADTs).
 - Using SANDAG's 2035 traffic volumes, all intersections and road segments would continue to operate at level of service (LOS) D or better with the Project.
 - The additional 110 PCE ADTs from the Project do not exceed the 2,400 ADT (or 200 peak hour trips) required for study under the region's Congestion Management Program as developed by SANDAG.
 - The Project would add only 29 trips during the a.m. peak and only 32 trips during the p.m. peak.

Based on this evidence, the County concluded the Project would not result in any peculiar or significant impacts on traffic or transportation. In addition, some commenters questioned

whether the ambient traffic counts were outdated and thus provided an inappropriate baseline for assessing the project's traffic contribution. However, as noted above the ambient traffic levels were derived from SANDAG's regional Congestion Management Program and account for growth up through 2035.

One commenter also stated that the project will be widening a portion of Mesa Rock Road to address a significant traffic impact, and that, for this reason, an EIR is required. That is incorrect. Mesa Rock Road is being widened to update the road's dimensions and bring them into compliance with current County standards. There are no significant, project-related traffic impacts on Mesa Rock Road.

11. Vectors

One comment stated that the Project could cause pests and related vectors to be released into the environment. Given that the proposed project will receive and process construction debris exclusively, the risk of vectors being released is low. However, because the facility will be receiving green waste in the form of tree waste, the County is requiring the applicant to prepare and implement an Integrated Pest Management (IPM) plan. The applicant has prepared the IPM plan and the County has reviewed and approved it. Based on these facts, the County has concluded that the project will not have a peculiar or significant impact on vector transmission.

12. Project's Eligibility for Exemption Under CEQA Guidelines Section 15183 and Public Resources Code Section 21083.3(b).

A number of commenters questioned whether the proposed project is eligible for exemption under CEQA Guidelines Section 15183, asserting that the Section 15183 exemption applies to residential projects, not industrial projects like NCER. Section 15183, however, is not limited to residential projects. Instead, the text of section 15183 refers generally to "development projects." The term "residential" does not appear anywhere in the text of this guidelines section. The California Resources Agency, which drafted and, along with the Office of Planning and Research, adopted section 15183, is explicit when it intends to restrict a particular guideline or exemption to residential projects or other projects of a specific type. See for example, CEQA Guideline sections 15179.5 and 15182, both of which make specific references to "residential," "commercial," and mixed-used" projects, whereas section 15183 does. In addition, no published court opinion has held that section 15183 applies only to residential projects. To the contrary, California courts have cited section 15183 in a variety of contexts, including a project that consisted of an airport land use plan. (*Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2007) 41 Cal.4th 372, 388-389, n.7.)

More importantly, section 15183 implements and derives from Public Resources Code section 21083.3, subsection (b), which provides as follows:

If a project is consistent with the general plan of a local agency and an environmental impact report was certified with respect to that general plan, the application of this division to the approval of that development project shall be

limited to the effects on the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report.

As the quoted text indicates, any development project that is consistent with a local agency's general plan is exempt from CEQA so long as the general plan in question was the subject of a certified EIR. The only exception to the exemption is when there is evidence that the proposed project – despite its consistency with the general plan – exhibits the potential to cause impacts “peculiar to the parcel or the project” that “were not addressed as significant effects in the prior environmental impact report.” Not only is this language nearly identical to that used in Guidelines section 15183, it makes no reference to residential projects and provides an independent basis for the exemption applied to the current project under review (NCER). Note also that the proposed project does not seek approval for any intensity of use beyond what the existing land use and zoning designations allow.

- Other comments expressed the opinion that the project did not qualify for a section 15183 exemption because the project requires site plan approval and a boundary adjustment and must meet or comply with a number of development criteria. By way of response, to qualify as exempt under Public Resources Code section 21083.3(b) and/or CEQA Guidelines section 15183, a project need only establish that it is consistent with the general plan and complies with the land use designation and underlying zoning of the subject parcel. That an otherwise-eligible project may also require subsidiary entitlements (e.g., site plan approval) or may be subject to additional development or operational conditions is not material to whether the project qualifies for review under section 15183. In fact, section 15183 applies even when the project in question must implement mitigation measures to address significant impacts. So long as the mitigation measures derive from the lead agency's uniform standards and policies, these can be applied to the project without disqualifying the project from the exemption.
- Some comments question why the County, which initially indicated that the project would require an EIR, later changed course and decided that the project could be processed via Public Resources Code section 21083.3(b) and CEQA Guidelines section 15183. In this case, after the initial EIR technical studies for the project were prepared, it became apparent that the project could be processed under Public Resources Code section 21083.3(b) and Guidelines section 15183.³ Thus, while the County may have initially required an EIR for the project, the data generated through the various technical studies showed that the project would result in no “peculiar” impacts not previously address in the 2011 GPU EIR. Moreover, the technical studies indicated that the project would not result in any significant effect that could not be mitigated through the imposition of uniform standards or policies.

³ The project's technical studies addressed a variety of topics, including aesthetics, air quality, biological resources, hazards and hazardous substances, hydrology, public services, traffic, GHG emissions, public utilities, energy use, water quality, noise, and cultural resources.

- Some comments have claimed that the technical studies on which the County relies on to apply section 15183 are outdated or inadequate. The County disagrees, and notes that no evidence has been submitted showing that the technical studies are insufficient or otherwise incapable of supporting the County's decision to process the proposed project as exempt under Public Resources Code section 21083.3(b) and/or CEQA Guidelines section 15183. The technical studies required and reviewed by the County provide substantial evidence that the project qualifies for the 15183 exemption from CEQA.
- A number of commenters asserted that the project would have significant offsite and/or cumulative impacts and that as a result, the project is not eligible for exemption under section 15183. The County disagrees. County staff assessed the proposed project for potentially significant off-site and/or cumulative impacts and, based on that analysis, concluded no such impacts would result. None of the public comments submitted to the County identified any specific off-site impact of the project that would be significant and not mitigable through the County's uniformly applied mitigation measures. Nor did any comment identify any significant cumulative impact to which the project would make a cumulatively considerable contribution. Therefore, the project would not cause a significant off-site and/or cumulative impact such that the project would be ineligible for the CEQA exemption provided under Public Resources Code section 21083.3(b) and/or CEQA Guidelines section 15183.
- One comment stated that the project does not qualify for the proposed exemption because "substantial new information" shows that the project will result in more severe impacts than those analyzed and contemplated in the 2011 GPU EIR – the document that addressed the impacts of designating the project site for Heavy Industrial uses. The comment, however, did not identify any "substantial new information" demonstrating that the project will result in impacts more severe than those anticipated and studied in the 2011 GPU EIR. For these reasons, the County confirms its conclusion that there is no substantial evidence of any impact that would disqualify the project from review under Public Resources Code section 21083.3 and CEQA Guidelines section 15183.
- One comment asserted that the project does not qualify for the proposed exemption because the project will not implement all of the mitigation measures set forth in the 2011 GPU EIR. The relevant test is whether the proposed project would result in impacts peculiar to its implementation or operation, or to the site itself, that were not addressed as significant impacts in the 2011 GPU EIR when the industrial land use and zoning designations were applied to the parcel(s) in question, or that there is new information showing more severe significant impacts than discussed in the prior EIR. The County thoroughly examined the project with this threshold question in mind. Through its review of the various technical studies prepared for the Project, the County determined that there were no such "peculiar" impacts, and that to the extent the Project would result in any significant impacts at all, those could be mitigated to a less than significant level through the application of standard mitigation measures, including those set forth in the 2011 GPU EIR. Thus, the Project remains eligible for the exemption.

- The key inquiry for the project is whether the County possesses sufficient information to determine whether the project qualifies for review under Public Resources Code section 21083.3 and/or CEQA Guidelines section 15183. That inquiry will necessarily be different from and less intense than the kind of impact analysis typically required of an EIR. In this particular instance, the County completed a high level of environmental review, resulting in numerous technical studies and impact-specific memoranda. The Project has been fully assessed and there is no substantial evidence showing that the Project would result in peculiar impacts disqualifying it from review under CEQA Guidelines section 15183.
- Some comments expressed a desire for the County to prepare a project specific EIR. However, Public Resources Code section 21083.3(b) and CEQA Guidelines section 15183 constrain the County's ability to require an EIR for any project that is consistent with the general plan and zoning code designations for the parcels in question. In this case, the project site is designated for heavy industrial uses and expressly allows recycling facilities such as the one proposed here. Therefore, the County may not require an EIR for the project unless there is evidence to indicate that the project or the project site would result in peculiar impacts not contemplated in the 2011 GPU EIR. Even if such impacts are identified, the County may not require a new EIR if the impacts in question can be mitigated through uniformly applied measures and standards. (CEQA Guidelines §15183.) In this case, the County, after much review of the technical data, determined that the Project met the qualifying criteria under Public Resources Code section 21083.3(b) and Guidelines section 15183. Hence, no EIR was required.
- Some comments stated that the County, in processing the project under Public Resources Code section 21083.3 and Guidelines section 15183, was improperly limiting public participation. The County disagrees. CEQA does not require projects that qualify for review under Public Resources Code section 21083.3 and Guidelines section 15183 to complete a public review and comment process. In this particular case, however, the County released the various technical reports for public review and invited the public to comment on the Project, consistent with past and current County practice. The County also held a public meeting at which County staff explained the process and notified the attendees that they could submit comments on the Project. These facts indicate that the County did not unlawfully limit public participation but rather provided numerous opportunities for public input beyond what CEQA requires.

13. Age of Technical Reports and Existing Conditions Baseline

Some comments questioned whether the County could rely on technical reports that are more than five years old. By way of response, there is nothing inherently unreliable about technical reports that are five or more years old. In many cases, the resource(s) under review do not change rapidly over time and there is no need to re-prepare a technical report provided

the project itself stays the same. Moreover, the County required the applicant to review each study prior to final submission to ensure that the information, analyses, and conclusions remained valid. County staff then independently reviewed the studies themselves and, where required, updates to the studies were prepared. Thus, it is incorrect to assume that the various technical reports prepared for the project are outdated or provide inaccurate information. The County made a concentrated effort to ensure that the studies and reports in question were sufficient to allow the County decisionmakers to determine whether the project did or did not qualify for the proposed exemption. The County also notes that none of the comments identified any particular deficiency in the technical reports or came forward with information indicating that conditions at the site had materially changed since the technical reports in question had been prepared.

One comment contended that the County failed to use the proper “existing conditions” baseline when it conducted its analysis of the project, citing CEQA Guidelines section 15125, subdivision (a). It must be remembered, however, that section 15125, subdivision (a), applies to projects for which an EIR is required. Here, section 15125(a) does not apply to the 15183 process. But if it did apply, the operative date for determining the existing conditions baseline would be September 12, 2014, the date of the County’s Notice of Preparation. And while the County ultimately determined that the project qualified for an exemption under section 15183 and did not require an EIR, the NOP date is still instructive for purposes of determining the proper existing conditions baseline. In this case, the County issued the NOP on September 12, 2014. Since that time, the County has required new or updated studies on each relevant resource and/or impact category. To the extent the applicant submitted studies prepared prior to the NOP, the County required that they be reviewed in light of current conditions to ensure their assumptions, descriptions, analyses and conclusions were still valid.

ATTACHMENT

From: [David Hubbard](#)
To: [Ochoa, Regina](#); [Kazmer, Gregory](#); [Slovick, Mark](#); [Neufeld, Darin](#)
Subject: FW: NCER Project -- Noise question
Date: Wednesday, May 20, 2020 11:22:40 AM
Attachments: [SD County I15 Noise Contours.pdf](#)
[LEQ to CNEL Calculations.pdf](#)

Here are the attachments.

From: Michael Greene <mgreene@dudek.com>
Sent: Wednesday, April 22, 2020 9:27 AM
To: David Hubbard <DHubbard@gdandb.com>
Cc: Alexandra Martini <amartini@dudek.com>
Subject: RE: NCER Project -- Noise question

Hi David, I've located the following information from a report prepared for the County of San Diego's General Plan Update EIR (2011):

<https://www.sandiegocounty.gov/content/sdc/pds/gpupdate/environmental.html>

Please see the attached, which is a portion of the Appendix F Noise Technical Report. The highlighted lines (the PDF tool I am using didn't let me select just one row, but the results we care about are the same) show the portion of the I-15 that is adjacent to the project site.

As you will note, at 100 feet from the I-15 centerline on the southbound side, the predicted 24-hour weighted average noise level (CNEL) is 81.6 dBA. This location would be just about at the toe-of-slope of the embankment. At a distance of 375 feet, which I believe would be well into the project site, beyond the Caltrans parcel in question, the noise level is estimated to be approximately 75 dBA CNEL. It should be noted that because the noise contour calculations do not account for noise reduction from terrain, this last estimate is overly high (Ldn's ambient noise measurement, approximately 400 feet from the I-15 centerline, was approximately 58 dBA L_{eq}). However, the Caltrans parcel is on the downslope facing the freeway and thus would not have the benefit of terrain shielding; thus, it is anticipated that the ambient noise level on the Caltrans parcel would be within the 75 dBA CNEL noise contour. The noise levels during the early AM and daytime hours (the period of interest) would vary throughout the day. Based upon the attached calculations, which use typical changes in traffic volume flow throughout a 24-hour period for roadways with Average Daily Traffic volumes above 10,000, the daytime hourly average noise levels would range from approximately 69 to 78 dBA L_{eq} , assuming a 24-hour weighted average level of 78 dBA CNEL (i.e., a level that is over 75 dBA CNEL but less than 81.6 dBA CNEL – somewhere roughly in the middle portion of the Caltrans parcel).

Please let me know if you have any further questions.

Thanks,



Mike Greene, INCE Bd. Cert.
Environmental Specialist / Acoustician
1 SW Columbia Street, Suite 1500
Portland, OR 97258
o: (949) 373 8317 / m: (949) 373 8317
mgreene@dudek.com

From: David Hubbard <DHubbard@gdandb.com>

Sent: Tuesday, April 21, 2020 11:22 AM

To: Michael Greene <mgreene@dudek.com>

Subject: NCER Project -- Noise question

Mike:

I've got a quick question regarding the NCER project. You may recall that Caltrans owns a parcel between the project site and the I-15 freeway, and that project-related noise levels at the boundary with the Caltrans parcel would be slightly over the County residential noise threshold. I believe the noise study concluded that this would not be a significant effect because (i) the parcel is owned by Caltrans and there are no homes on it, (ii) the parcel is steeply sloped and thus not likely to be developed for residential uses, and (iii) the parcel is immediately adjacent to the I-15, which likely generates higher noise levels on the parcel than the project would. It's point (iii) that I am interested in. Is there a way for you to determine what the I-15 noise impacts on the Caltrans parcel would be, during the 5 a.m. to 7 p.m. timeframe? Let me know if you have questions.

David Hubbard
760.431.9501
www.gdandb.com



NOTICE: This communication and any attached document(s) are privileged and confidential. In addition, any disclosure of this transmission does not compromise or waive the attorney-client privilege or the work product doctrine. If you have received this communication in error, please delete it and contact me at dhubbard@gdandb.com.

Worksheet: CNEL From Short-Term Sample

Project:	NCER Hilltop				Peak-Noise		
INPUT:	Selected Hour:	77.3	dBA (L _{eq})	Selected Hr:	7	(Hrs 1-24)	Hour Leq: 77.6 (dBA Leq)

1-Hour Period Beginning at:	Percent of ADT Flow (assume >= 10,000 ADT)	Change From Hr: 7 (Assumed Pk-Noise Hr.)	Expected L _{eq} (H)	Resultant 24-hr. L _{eq}	Weighting for CNEL	Adjusted L _{eq} (H)	Resultant CNEL	Weighting for L _{dn}	Adjusted L _{eq} (H)	Resultant L _{dn}
0100	0.8	-10.5	66.8	74.0	10	76.8	78.0	10	76.8	77.6
0200	0.6	-11.7	65.6		10	75.6		10	75.6	
0300	0.4	-13.5	63.8		10	73.8		10	73.8	
0400	0.5	-12.5	64.8		10	74.8		10	74.8	
0500	1.2	-8.7	68.6		10	78.6		10	78.6	
0600	5.3	-2.3	75.0		10	85.0		10	85.0	
0700	8.9	0.0	77.3		0	77.3		0	77.3	
0800	5.8	-1.9	75.4		0	75.4		0	75.4	
0900	4.6	-2.9	74.4		0	74.4		0	74.4	
1000	4.5	-3.0	74.3		0	74.3		0	74.3	
1100	4.7	-2.8	74.5		0	74.5		0	74.5	
1200	4.8	-2.7	74.6		0	74.6		0	74.6	
1300	4.9	-2.6	74.7		0	74.7		0	74.7	
1400	5.2	-2.3	75.0		0	75.0		0	75.0	
1500	6.8	-1.2	76.1		0	76.1		0	76.1	
1600	9.5	0.3	77.6		0	77.6		0	77.6	
1700	8.9	0.0	77.3		0	77.3		0	77.3	
1800	6	-1.7	75.6		0	75.6		0	75.6	
1900	4.4	-3.1	74.2		5	79.2		0	74.2	
2000	3.4	-4.2	73.1		5	78.1		0	73.1	
2100	2.9	-4.9	72.4		5	77.4		0	72.4	
2200	2.3	-5.9	71.4		10	81.4		10	81.4	
2300	2	-6.5	70.8		10	80.8		10	80.8	
2400	1.4	-8.0	69.3		10	79.3		10	79.3	

APPENDIX F

NOISE TECHNICAL REPORT

Noise Technical Report
for the County of San Diego
General Plan Update

Prepared for:

County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA, 92123

Prepared by:



9275 Sky Park Court, Suite 200
San Diego, California 92123

May 21, 2009

Appendix B

Traffic Noise Levels

Roadway			Number Lanes	Peak Hour Traffic		ADT	Vehicle Mix				Speed	CNEL Distance to dBA Contour Line (feet)												
Street Name	Segment						MDT	HDT	%MDT	%HDT		UNIQUE	ID	OLOS	IFC	IMED	HOV	TNM Code	100 feet	75 CNEL	70 CNEL	65 CNEL	60 CNEL	55 CNEL
	From	To		AM	PM																			
HUTCHISON	BLACKWELL	MASON	2	477	791	5748	172	115	3%	2%	30	1911	3	5	1	0	LC	61.2	--	--	42	132	315	
HUTCHISON	EAST VISTA	BLACKWELL	2	485	791	5869	176	117	3%	2%	30	1915	3	5	1	0	LC	61.2	--	--	42	132	315	
I-15 HOV NB	SR-163 NB	SR-163	9	-10	3200	25363	761	1268	3%	5%	65	1274	3	1	2	0	HOV	0	0	0	0	0	0	
I-15 HOV NB	SR-163 NB	SR-163	9	-10	3200	25363	761	1268	3%	5%	65	1308	3	1	2	0	HOV	0	0	0	0	0	0	
I-15 HOV SB	POMERADO	POMERADO	2	1402	-10	16720	502	836	3%	5%	65	1268	2	1	2	0	4F	78.8	214	500	988	1925	3750	
I-15 HOV SB	POMERADO	POMERADO	2	1402	-10	16720	502	836	3%	5%	65	1305	2	1	2	0	4F	78.8	214	500	988	1925	3750	
I-15 NB	POMERADO	POMERADO	6	11437	10116	151219	4537	7561	3%	5%	65	1277	11	1	1	1	12FHOV	83.7	538	1071	2000	3889	7250	
I-15 NB	POMERADO	POMERADO	6	10116	151219	4537	7561	3%	5%	65	1288	11	1	1	1	12FHOV	83.7	538	1071	2000	3889	7250		
I-15 NB	POMERADO	POMERADO	6	11792	11050	162466	4874	8123	3%	5%	65	1299	11	1	1	1	12FHOV	83.7	538	1071	2000	3889	7250	
I-15 NB	POMERADO	CARROLL CANYON	5	12979	11160	166543	4996	8327	3%	5%	65	1308	11	1	1	1	10FHOV	83.1	479	950	1825	3550	6714	
I-15 NB	CENTRE CITY	CITRACADO	5	6277	9492	116192	3486	5810	3%	5%	65	1584	5	1	1	0	10F	82.5	438	873	1680	3227	6214	
I-15 NB	CITRACADO	CITRACADO	5	6216	9012	113255	3398	5663	3%	5%	65	1596	4	1	1	0	10F	82.5	438	873	1680	3227	6214	
I-15 NB	CITRACADO	09TH	5	6347	9138	116347	3490	5817	3%	5%	65	1621	4	1	1	0	10F	82.5	438	873	1680	3227	6214	
I-15 NB	09TH		4	5843	8688	110675	3320	5534	3%	5%	65	1632	5	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	SR-78 WB	SR-78 EB	4	3379	6365	70793	2124	3540	3%	5%	65	1666	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	SR-78 WB	SR-78 EB	4	3379	6365	70793	2124	3540	3%	5%	65	1674	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	SR-78 WB	SR-78 EB	4	3379	6365	70793	2124	3540	3%	5%	65	1682	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	SR-78 WB	SR-78 EB	4	3379	6365	70793	2124	3540	3%	5%	65	1688	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	SR-78 WB	SR-78 WB	4	3380	6859	75955	2279	3798	3%	5%	65	1692	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	SR-78 WB	EL NORTE	4	3411	7505	80109	2403	4005	3%	5%	65	1700	5	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	SR-78 WB	EL NORTE	4	3411	7505	80109	2403	4005	3%	5%	65	1712	5	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	EL NORTE	CENTRE CITY	4	2907	7122	73497	2205	3675	3%	5%	65	1739	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	DEER SPRINGS	DEER SPRINGS	4	2876	6828	69485	2085	3476	3%	5%	70	1748	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	CENTRE CITY	DEER SPRINGS	4	2876	6828	69485	2085	3474	3%	5%	70	1750	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	CENTRE CITY	DEER SPRINGS	4	2878	6830	69513	2085	3476	3%	5%	70	1755	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	CENTRE CITY	DEER SPRINGS	4	2878	6830	69513	2085	3476	3%	5%	70	1766	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	CENTRE CITY	DEER SPRINGS	4	2878	6830	69513	2085	3476	3%	5%	70	1794	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	DEER SPRINGS	DEER SPRINGS	4	2761	6308	64713	1941	3236	3%	5%	70	1810	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	DEER SPRINGS	DEER SPRINGS	4	2761	6308	64713	1941	3236	3%	5%	70	1821	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	DEER SPRINGS	GOPHER CANYON	4	3142	6834	70595	2118	3530	3%	5%	70	1905	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	GOPHER CANYON	GOPHER CANYON	4	2873	5983	63107	1893	3155	3%	5%	70	1921	3	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	GOPHER CANYON	GOPHER CANYON	4	2873	5983	63107	1893	3155	3%	5%	70	1953	3	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	GOPHER CANYON	OLD 395	4	3083	7020	70952	2129	3548	3%	5%	70	1965	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	GOPHER CANYON	OLD 395	4	3083	7020	70952	2129	3548	3%	5%	70	1982	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	OLD 395	OLD 395	4	3044	6670	69105	2073	3455	3%	5%	70	1992	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	OLD 395	OLD 395	4	3044	6670	69107	2073	3455	3%	5%	70	2004	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	OLD 395	PALA	4	3056	6677	69252	2078	3463	3%	5%	70	2061	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	PALA	PALA	4	2421	5966	1790	2983	3%	5%	70	2077	4	1	1	0	8F	81.6	375	770	1480	2800	5571		
I-15 NB	PALA	PALA	4	2421	6237	59666	1790	2983	3%	5%	70	2092	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	PALA	STEWART CANYON	4	2794	6754	65272	1958	3264	3%	5%	70	2150	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	STEWART CANYON	STEWART CANYON	4	2794	6754	65272	1958	3264	3%	5%	70	2160	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	STEWART CANYON	STEWART CANYON	4	2794	6754	65272	1958	3264	3%	5%	70	2170	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	STEWART CANYON	MISSION	4	2794	6754	65272	1958	3264	3%	5%	70	2226	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	MISSION	MISSION	4	2560	5836	57761	1733	2888	3%	5%	70	2246	3	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	MISSION	MISSION	4	2560	5836	57761	1733	2888	3%	5%	70	2277	3	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	MISSION	RAINBOW VALLEY WEST	4	2802	7055	66373	1991	3319	3%	5%	70	2300	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	RAINBOW VALLEY WEST	RAINBOW VALLEY WEST	4	2801	7023	66254	1988	3313	3%	5%	70	2305	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 NB	RAINBOW VALLEY WEST	RAINBOW VALLEY WEST	4	2801	7023	66254	1988	3313	3%	5%	70	2306	4	1	1	0	8F	81.6	375	770	1480	2800	5571	
I-15 SB	MIRAMAR	MIRAMAR	6	10139	10072	131309	3939	6565	3%	5%	65	1269	4	1	1	1	12FHOV	83.7	538	1071	2000	3889	7250	
I-15 SB	MIRAMAR	MIRAMAR	6	10139	10072	131309	3939	6565	3%	5%	65	1298	4	1	1	1	12FHOV	83.7	538	1071	2000	3889	7250	
I-15 SB	CARROLL CANYON	MIRAMAR	6	11264	10333																			