Response to Comment Letter X1

Gregg Curtis
March 6, 2014

X1-1 This comment raises concerns related to groundwater use during construction and operation of the Proposed Project. Potential impacts related to groundwater use are considered and addressed in the Draft Program Environmental Impact Report (DPEIR); see Section 3.1.5.3.4, Groundwater Resources, and Section 3.1.9.3.1, Water. Also refer to common response WR1.

X1-2 Fugitive dust impacts are analyzed in Section 2.2.3.2 of the DPEIR. Particulate matter (PM$_{10}$ and PM$_{2.5}$) emissions were estimated for the Proposed Project and project design features have been identified to reduce impacts related to fugitive dust emissions.

Moreover, as stated in Section 2.2.2 of the DPEIR, the San Diego Air Pollution Control District’s (SDAPCD’s) Regulation IV: Prohibitions; Rule 55: Fugitive Dust, regulates fugitive dust emissions from any commercial construction activity capable of generating fugitive dust emissions beyond the project site (SDAPCD 2009). Compliance with this rule would further minimize fugitive dust impacts. Furthermore, County Code Section 87.428 requires that “All clearing and grading shall be carried out with dust control measures adequate to prevent creation of a nuisance to
persons or public or private property.” Project design feature PDF-AQ-1 will be incorporated to minimize fugitive dust during construction activities and comply with County Code Section 87.428. Fugitive dust violations can be reported to the SDAPCD, which would investigate the complaint, and to County staff. Regarding fugitive dust following completion of construction activities, dust control measures including the application of a nontoxic soil stabilizer or other acceptable methods that would be applied annually have been incorporated as conditions of approval for the Proposed Project to reduce fugitive dust impacts.

In addition, Mitigation Measure M-BI-PP-5, as described in Section 2.3.6.1 of the DPEIR, requires the development of a project-specific fugitive dust control plan.

Please refer to the response to comment I34-4 regarding the potential for traffic hazards. In addition, please refer to common response TRAF1, which addresses maintenance of project area roads.

“Fire prevention fees” were not discussed in the DPEIR since this topic is not related to environmental impacts (see 14 CCR § 15131). The Proposed Project’s potential impact to fire hazards in the area were analyzed in Section 3.1.4, Hazards and Hazardous Materials.
X1-5 The County disagrees that the Proposed Project would result in higher ambient temperatures in the area surrounding the Proposed Project sites; see response to comment I91-5.

The County acknowledges the commenter’s opposition to the Proposed Project. The information in this comment will be in the FPEIR for review and consideration by the decision makers.

References

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