

APPENDIX D

AIR QUALITY MEMORANDUM

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SUBJECT: Air Quality Memorandum for the updated El Corazon Development in Oceanside CA

- **ZA17-00004; D18-00017; T17-00004**

Ldn Consulting, Inc. (Ldn) has reviewed the proposed El Corazon Specific Plan Amendment (SPA), construction plan and associated traffic analysis report. The El Corazon Specific Plan site is located in the area bound by Mesa Drive, Rancho Del Oro Drive, Oceanside Boulevard and El Camino Real within the City of Oceanside. The proposed Specific Plan Amendment (SPA), Development Plan (DP) and Tentative Map (TM) address adjustments to various land use and circulation elements in the Specific Plan and divides the project area into several parcels, streets and infrastructure areas which will facilitate the future build out of a variety of land uses consistent with those envisioned by the Specific Plan.

The SPA also adds the word "arenas" to allowed uses in the Commercial Recreation and Entertainment Districts. Overall, the amendment proposes minor adjustments to the size of certain districts (i.e., smaller Parks and Recreation, Civic Services, and Hotel Districts, larger Habitat and Village Commercial, and Oceanside Boulevard Commercial Districts). In addition, the proposed project would change the presumption in the certified 2009 El Corazon Specific Plan FEIR from exporting excess earthwork material off-site to balancing such material on-site to be disposed at identified locations within the El Corazon Specific Plan, although a minor amount of local soil export on a case-by-case basis may occur.

The purpose of this analysis is to determine if the proposed modifications would result in additional or increased air quality impacts compared to those identified in the certified 2009 El Corazon Specific Plan FEIR.

Project Information

Construction

As stated in the certified 2009 El Corazon Specific Plan FEIR, the El Corazon project is proposed to be constructed in six phases over 15 to 20 years. During that time, it is possible that construction activities would result in short-term air quality impacts due to potential use of heavy construction equipment and fugitive dust and emissions from vehicles used by contractors and City personnel at the project site. Construction equipment, employees, and the potential for soil import/export could generate a substantial amount of construction-related traffic. This increase in traffic could

generate sufficient ADT to result in significant impacts to the local roadway networks. With respect to soil import/export, earthwork would be necessary to stockpile materials and to load haul trucks. The FEIR assumed that large quantities of graded material would be exported offsite. Specific mitigation to address these construction-related air quality impacts were spelled out on pages 4.2-20 and 4.2-21 of Section 4.2 of the FEIR. The FEIR concluded that potential impacts related to fugitive dust would be mitigated below a level of significance, however, construction emissions for reactive organic gasses (ROG) would remain significant and unavoidable.

Under the proposed SPA, DP & TM, the project would shift the presumption from offsite soil export to balancing at least 75 percent of excess earthwork onsite, although a minor amount of local soil export on a case-by-case basis may occur. This change to the project would greatly reduce or make unnecessary the large number of offsite haul trips anticipated by the FEIR. On average, material export requires typically a 20-mile round trip for each hauled load offsite. The project applicant indicated that the balanced earthwork would be approximately 1.68 million CY. A typical haul truck could move roughly 10-15 CY per trip. Given this, the proposed SPA, DP & TM would reduce haul trips by as much as 84,000 to 112,000 trips or 1,680,000 to 2,240,000 haul miles offsite. In addition, when trucks enter and leave construction sites, some dust (even with mitigation) is transferred from the haul truck tires to the offsite roadways. Greatly reducing the number of haul trucks leaving the site will also reduce these fugitive dust emissions.

The earthwork necessary to stockpile graded material would be similar whether preparing to export soil offsite (as assumed in the FEIR), or balancing soil onsite (as under the proposed SPA, DP & TM). To mitigate onsite fugitive dust emissions, the FEIR provides mitigation measures, including but not limited to heavy wetting of disturbed soils, covering backfill material when not actively hauled, minimizing height and speed of soil loader bucket emptying, speed of construction equipment onsite, etc. The same mitigation measures required in the FEIR would also be a requirement under this proposed SPA. Additionally, the distance to move the hauled material onsite is virtually the same distance needed to get the material offsite. Therefore, the onsite dust generation from the trucks would be similar.

Finally, onsite material haulage to permit soil balancing onsite may also include larger trucks that would result in fewer haul trips and less onsite dust emissions.

Therefore, given the changes proposed by the SPA, DP & TM, fugitive dust emissions would be less than what was identified in the 2009 El Corazon Specific Plan FEIR and would significantly reduce offsite haulage air quality emissions. Onsite construction activities must still adhere to the mitigation measures identified in the 2009 El Corazon Specific Plan FEIR and no increased air quality impacts would be expected.

Operational

The Specific Plan allows for a variety of park, habitat and open space, hotel, commercial, and residential uses within prescribed planning areas. The VC and OBC districts, as proposed, represent approximately 54 acres of the overall Specific Plan area.

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In conjunction with the Development Plan & Tentative Map, current amendments to the Specific Plan are also proposed as necessary to address acreage adjustments for the various land use districts. Revisions to the Specific Plan Circulation component are also proposed to accommodate roadway location and street section revisions necessary to support the proposed project and future development.

The proposed SPA, Development Plan & Tentative Map divides the project into several parcels, with major streets and infrastructure being provided by the Master Developer, to facilitate build out with a variety of commercial and residential uses consistent with the Specific Plan. The site has been designed to accommodate future development of a broad range of product types from multi-family buildings, small/medium/large retail, large office/manufacturing/warehouse users and sporting facilities such as an arena. The lot sizes and configurations have been designed to maintain flexibility in responding to the needs of the market as the project builds out, by providing lots which can easily be combined in a variety of configurations to accommodate larger users or can be developed with smaller uses.

The Development Plan & Tentative Map area of the proposed project encompasses 82.9 acres within the southeastern portion of the Specific Plan site, including 14.4 acres of existing and proposed public streets. The Development Plan & Tentative Map would facilitate the ultimate buildout and operation of 155,000 sf of retail, 169,000 sf of office, 170,000 sf of manufacturing/storage, 24,000 sf of commercial, 268 apartments and an 8,000-person capacity multi-story arena.

Approval of the proposed Development Plan & Tentative Map would result in the creation of future building pads, roads, sidewalks, parking and associated infrastructure to allow for the above identified land uses, but would not include the construction of any buildings. It is recognized that, beyond the scope of this Development Plan, Tentative Map and Specific Plan Amendment, the proposed development of areas within the VC and OBC Districts will require additional processing and approval of requisite Development Plans and Conditional Use Permits as part of separate discretionary review processes. Future development applications for each lot will be submitted to the City of Oceanside for review, in a phased manner, to ensure that individual developments meet the standards and goals of the El Corazon Specific Plan.

Findings

Consistent with the El Corazon Specific Plan land use and development goals, this project will provide for residential, office and retail development of this former mining site in a key corridor of Oceanside that creates a high-quality environment for businesses, employees, residents and customers. The proposed Specific Plan Amendment, Development Plan and Tentative Map application is consistent with the Specific Plan Vision Statement; does not change the general location or mix of planned land uses and park areas within the Specific Plan area; and would allow for the implementation of planned land uses and continued build-out of the Specific Plan area as originally envisioned with mixed-use, commercial, office and industrial development supporting park areas and operations.

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With respect to construction-related air quality impacts, Ldn Consulting has reviewed the 2009 El Corazon Specific Plan FEIR and has evaluated how those impacts may change under the proposed SPA, DP & TM. Under the proposed SPA, DP & TM, fugitive dust emissions would be less than what was identified in the FEIR, due to significantly reduced air emissions related to offsite haulage of soil in favor of balancing soil onsite. Onsite construction activities must still adhere to the mitigation measures identified in the FEIR and no increased air quality impacts related to onsite soil balancing would be expected.

With respect to operational air quality impacts, Ldn Consulting reviewed the updated traffic analysis prepared by Linscott, Law & Greenspan Engineers (LLG) for the El Corazon Specific Plan Amendment, Development Plan and Tentative Map (2018). The trip generation, project mitigation measures and intersection volumes were specifically reviewed. The total trip generation for the entire El Corazon site, with the ultimate land uses of the proposed project, is 26,708 average daily trips (ADT), about 8,600 fewer than the approved Specific Plan. Total trip generation for the entire El Corazon site, with the ultimate land uses of the proposed project and the temporary "Field of Dreams" site is 29,025 ADT, or approximately 5,600 ADT fewer than those analyzed within the FEIR under the approved Specific Plan. Overall, the trip generation was reduced by the proposed SPA, DP & TM and the intersections are anticipated to operate at an acceptable level under the proposed SPA, DP & TM.

Therefore, there are no changes to the conclusions of the certified 2009 El Corazon Specific Plan FEIR regarding air quality impacts because the revisions to the Specific Plan would not cause new significant environmental effects to air quality or cause a substantial increase in the severity of previously identified significant air quality effects, and no additional mitigation measures are necessary. If you should have any questions regarding this proposal, please call me at (760) 473-1253 or jlouden@ldnconsulting.net at your convenience.

Sincerely,
Ldn Consulting, Inc.



Jeremy Loudon, Principal