

February 5, 2021

Mr. Everett DeLano, Esq.
DELANO & DELANO
104 W. Grand Avenue, Suite A
Escondido, CA 92025

Subject: Trails at Carmel Mountain Ranch Draft EIR Noise Review, City of San Diego

Dear Mr. DeLano:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of potential environmental noise impacts identified in the Trails at Carmel Mountain Ranch Draft Environmental Impact Report, December 2020 (hereinafter referred to as DEIR).

According to the DEIR, the project proposes to redevelop the closed Carmel Mountain Ranch Country Club and associated 18-hole golf course with a total of 1,200 multi-family homes and a mix of open space and recreational uses. The project also proposes a future development of community commercial amenities that would include an art studio and a café/restaurant/banquet area. The proposed project is located within the Carmel Mountain Ranch Community and City of San Diego.

The purpose of this letter is to review the DEIR from a noise impact standpoint and provide comments to help ensure that all potential impacts from the project are adequately identified and the effects mitigated to the maximum extent feasible.

RK is located in Newport Beach, California and specializes in environmental planning for governmental agencies, private sector businesses, and community groups. The firm principals have over 70 years of combined engineering and planning experience throughout Southern California. RK has prepared hundreds of noise impact studies, and we are fully aware of the complexity of data gathering, modeling, and the possibility for error within these technical documents.

Comments

The following comments are offered with respect to the analysis of potential noise impacts described in the DEIR:

1. Section 5.11.1, Existing Conditions. The DEIR provides a very narrow assessment of existing ambient noise conditions by only measuring noise levels for 10- or 15-minute periods during morning hours, between 10 am and noon, on one weekday. The proposed project consists of uses that will generate noise 24-hours a day, 7 days a week (i.e. parking lot noise, mechanical equipment, outdoor social activities, etc.). Therefore, the DEIR should identify the existing ambient environment during all hours of the day when the project has the potential to generate noise.

2. Section 5.11.3, Short-term Construction Noise Impact Analysis. Page 5.11-9 of the DEIR concludes that “the majority of construction operations associated with the proposed project would exceed the City’s 75 dBA 12-hour average property line noise level threshold”. However, the DEIR has not adequately demonstrated how mitigation measure MM-NOI-1 will effectively reduce the impact to less than significant levels. According to Table 5.11-6, construction noise levels will need to be reduced by more than 10 dBA, and in cases where construction noise occurs closer than 50-feet, noise levels will need to be reduced even further. Page 5.11-20 mentions potential noise reductions may be achieved from barriers and enclosures, but MM-NOI-1 only requires barriers around impact tools. Construction noise impacts will be caused by more than just impact tools. As identified in Table 5.11-5, there are many different types of construction equipment that will generate noise in excess of 75 dBA. Therefore, given the close proximity of the project site to adjacent residential homes, the following mitigation measure should be required:
 - Install temporary noise barriers around all active construction sites. Noise barriers should be at least 8-feet high and installed at the first phase of construction, prior to performing any demolition, excavation or grading activities. The noise barrier walls should present a solid face area and include sound absorptive material or blankets which can be installed in multiple layers for improved noise insulation.

Due to the variability of construction activities and the limitation of noise barriers to shield second floor or third floor residential receptors, it is still likely construction

noise levels will exceed the threshold of significance near residential property lines. Therefore, the DEIR should provide further mitigation, as follows:

- Implement an active construction noise monitoring program that will report real-time noise levels at residential property lines closest to the active areas of construction. Repeated violations should result in citations and/or revocation of building permit.
3. Section 5.11.3, Residential Mechanical Equipment. Page 5.11-17 of the DEIR states, "Assuming an attenuation rate of 6 dB per doubling of distance and shielding that would break the line of site [*sic*] to the outdoor HVAC equipment, the noise level at the nearest receiving property line would be approximately 44.5 dBA during continuous operation, exceeding the San Diego Municipal Code residential noise level standard of 40 dBA between 10:00 p.m. and 7:00 a.m.". The result is a potentially significant impact. MM-NOI-2 indicates that the mitigation to alleviate this potential impact is to shield units behind a barrier so that line of sight from the noise source to the property line of the adjacent noise-sensitive receptors is blocked. However, the analysis has already taken barrier shielding into consideration and it was demonstrated that the resulting noise levels would still result in a significant impact. Thus, MM-NOI-2 does not demonstrate how it would further reduce the impact to less than significant levels, but rather defers mitigation to subsequent studies at a later time.
 4. Section 5.11.3, On-Site Traffic Noise Compatibility. The DEIR finds that the project will expose future residences living in the Unit 5 development area to excessive noise levels that fall within the "incompatible" limits of the City of San Diego General Plan Noise Element. Per the City's Noise Compatibility Guidelines, Table NE-3, new construction should not be undertaken and severe noise interference making outdoor activities unacceptable would occur for land uses within incompatible areas. The DEIR goes on to make unsubstantiated claims that an earthen berm and intervening buildings would block freeway noise to the future outdoor activity areas. However, the primary areas of concern should be the habitable dwelling units where future residences will live, which based upon this review, would be located approximately 600 feet from the centerline of the I-15 Freeway. The DEIR instead analyzes noise impacts at 850 feet away, thus underestimating noise levels. Furthermore, first row units facing the freeway, and in particular any unit located above ground floor level, will receive very little noise attenuation from the

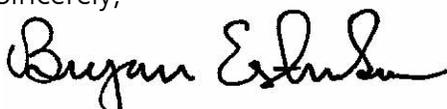
topography. The final EIR should make it clear that residential units are being proposed adjacent to the I-15 freeway in an incompatible area for noise.

5. Section 5.11.3, General Comment. The DEIR does not analyze all potential sources of noise generated by the project, and as a result, noise impacts are under-reported. In particular, parking lot noise associated with internal drive-aisles and on-site circulation, vehicle idling, horn honking, door slamming, loading/unloading activities, trash collection, and truck deliveries are common sources of noise that would occur during both daytime and nighttime hours. These types of noise sources were not evaluated and should be considered within the DEIR as stationary sources of noise that would contribute to the project's overall noise impact.
6. Section 5.11.3, General Comment. The DEIR does not address the City of San Diego CEQA Significance Determination Thresholds, July 2016 initial study checklist question, which, as stated on Page 50 requires that a project be evaluated to determine whether it would result or create a significant increase in the existing ambient noise levels. As stated previously in Comment #1, the DEIR provides a very narrow assessment of existing ambient conditions and only measures noise levels for a short period of time during daytime hours. However, as identified in the DEIR, the project will generate noise levels during both daytime and nighttime hours. Therefore, in addition to comparing stationary noise levels to the allowable noise levels in the noise ordinance, the DEIR should also disclose changes in ambient conditions from the combined impact of all project noise sources. Failing to do so conceals the overall impact of the project, especially during nighttime hours when noise levels are likely much lower than what was measured during the day.

Conclusions

RK appreciates the opportunity to work with the DELANO & DELANO in reviewing the Trails at Carmel Mountain Ranch DEIR. If you have any questions please give call at (949) 474-0809

Sincerely,



Bryan Estrada, AICP
Principal

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