

AIR QUALITY SUPPLEMENTAL MEMORANDUM

To: Greg Shannon, Midway Rising, LLC
From: Sharon Toland, Principal Technical Specialist
RE: Privately Owned Parcels and Effects on the Air Quality Analysis
Date: October 18, 2024
CC: Kelsey Hawkins, Project Manager, and Diane Sandman, EPC Vice President, Harris & Associates

The purpose of this memorandum is to address changes to the Midway Rising Project (Project) made following the completion of air quality modeling provided in the Air Quality Technical Report and Health Risk Assessment (Air Quality Report). Modeling assumes development of 2.85 acres of privately owned parcels on the south side of Kurtz Street at 3467, 3487, and 3495 Kurtz Street. The Air Quality Report modeling assumed the privately owned parcels would be developed with 373 market-rate dwelling units, 10,000 square feet of commercial land use, a 3,500-seat theater, and a parking garage containing 707 parking stalls. Following the completion of modeling, the privately owned parcels were removed from the Specific Plan and are no longer part of the Project. Removal of privately owned parcels from the Project reduces the overall construction required, as well as operational emissions from vehicle trips, area sources, and commercial kitchen natural gas use. The following sections compare the conclusions of the Air Quality Report to the scenario currently proposed where the privately owned parcels have been removed from the Project to demonstrate that the Air Quality Report represents a conservative analysis for the Project. The study site plan refers to the site plan used for Project air quality modeling that includes the privately owned parcels. The Project without the privately owned parcels is referred to as the modified site plan.

This memorandum incorporates the findings of two traffic memorandums prepared by Kimley-Horn related to the effect of removal of the privately owned parcels: (1) EIR Appendix D2: Midway Rising [PRJ-1106734]: Privately Owned Parcels and Effects on the Vehicle Miles Traveled Analysis, and (2) EIR Appendix D1: Midway Rising [PRJ-1106734]: Privately Owned Parcels and Effects on the Local Mobility Analysis. These memorandums include a review of the previously completed Vehicle Miles Traveled Analysis and Local Mobility Analysis that are based on the site plan that included the privately owned parcels. Kimley-Horn determined that the conclusions of the previously completed Vehicle Miles Traveled Analysis and Local Mobility Analysis remained valid with removal of the privately owned parcels. The Vehicle Miles Traveled Analysis and Local Mobility Analysis, based on the study site with the privately owned parcels, provide a conservative analysis of potential Project impacts, and revised traffic modeling was determined not to be necessary.

Threshold 1: Consistency with Regional Air Quality Plans

The Air Quality Report determined that the Project would not exceed applicable San Diego Air Pollution Control District (SDAPCD) thresholds for construction and would, therefore, be consistent with construction-related assumptions in the State Implementation Plan and Regional Air Quality Strategy. The modified site plan reduces the overall construction effort; therefore, construction emissions would decrease, and no new impact would occur related to construction emissions compared to SDAPCD thresholds. During operation,

the Project was determined to be consistent with the Regional Air Quality Strategy because the Project would be VMT-efficient and the net increase in mobile emissions attributable to the Project would not exceed SDAPCD thresholds. Kimley-Horn determined that the modified site plan would not result in any changes to the conclusions of the VMT analysis and the Project would result in a net decrease in vehicle trips compared to the study site plan. Mobile emissions would decrease compared to the study site plan and no new exceedance of SDAPCD thresholds would occur. As such, there would be no change in the conclusion regarding air quality plan consistency with the modified site plan.

Threshold 2: Conformance to Federal State and Ambient Air Quality Standards

The modified site plan would reduce total construction compared to study site plan assumptions, including a reduction of 2.85 acres of disturbance area, approximately 6,000 cubic yards of fill, and 84,000 square feet of building demolition. As such, the total number of working days, grading area, and truck trips would be incrementally reduced compared to the analysis included in the Air Quality Report. Phase 1 development would also decrease from 1,242 units to 875 units, and commercial development would be reduced from 100,888 square feet to 90,888 square feet. There would be no change to the anticipated construction equipment fleet, or maximum anticipated daily vehicle and truck trips. As such, an increase in construction emissions would not occur under the modified site plan and there would not be a change in the conclusion regarding construction emissions and air quality standards.

Operation of the Project without the privately owned parcels would incrementally reduce VMT, landscape area, consumer product demand, and architectural coating use compared to the study site plan. Kimley-Horn calculated that the modified site plan would result in a net decrease of 2,864 daily vehicle trips compared to the study site plan (EIR Appendix D2). Therefore, emissions from the modified site plan would be reduced compared to the study site plan and no new exceedances of SDAPCD thresholds would occur. The study site plan was determined to result in maximum net daily emissions of 153.7 pounds per day compared to the threshold of 137 pounds per day. The reduction of 373 market-rate dwelling units and 10,000 square feet of commercial land use represents an approximately 8 percent reduction in residential units and 7 percent reduction in commercial development. Removal of the theatre would also incrementally reduce operational volatile organic compound emissions. A reduction of approximately 7 percent in Project volatile organic compound emissions would result in emissions of approximately 143 pounds per day and would continue to exceed the SDAPCD threshold for volatile organic compound emissions. This calculation provides a rough estimate for comparison but does not represent the actual reduction in emissions that would occur with the modified site plan. For example, this calculation does not calculate actual change to landscape area or allowable restaurant space. However, it is reasonable to conclude that the potentially significant impact would continue to be anticipated for the modified site plan, and Mitigation Measure AIR-1 would continue to be required. The study site plan is therefore a conservative analysis of Project operation emissions, and there would no change in the conclusion.

Threshold 3: Impacts to Sensitive Receptors

As described above in Threshold 2: Conformance to Federal State and Ambient Air Quality Standards, the modified site plan would result in a net decrease in vehicle trips on the Project site. Therefore, new congestion would not occur compared to the study site plan and there would be no change to the conclusion regarding carbon monoxide hotspots. Total construction effort would be reduced compared to the study site plan; therefore, there would be an incremental decrease in exposure to diesel particulate matter from construction activities. As such, the calculated cancer and non-cancer risks for construction of the study site plan are conservative for the modified site plan. There would be no change to haul routes or maximum daily construction effort due to the modified site plan. As a result, a significant impact to the Villa Marbella apartment would still be anticipated for the modified site plan and mitigation measure AIR-2 would continue

to be required. The modified site plan would reduce total development and would not introduce any new operational sources of toxic air contaminants. As such, there would be no changes to the conclusions related to sensitive receptors as a result of removal of the privately owned parcels from the Project.

Threshold 4: Odors

The modified site plan would reduce total development and would not introduce any new construction or operational sources of odors. As such, there would be no change to the conclusion related to odors as a result of removal of the privately owned parcels from the Project.

Conclusion

The modified site plan would reduce the total construction and daily operations on the Project site compared to the study site plan. As such, the study site plan analysis adequately and conservatively analyzes the impacts that would occur. The conclusions of the Air Quality Report remain valid and do not need to be updated as a result of removal of the privately owned parcels from the Project.

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