

I-269 Donna McClelland

- I -269-1** The commenter thanks the County for considering her comments and explains that she has several concerns.

The County acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

- I -269-2** The commenter asks what is going to happen to wildlife while blasting is conducted. The commenter asks if they would die immediately or would die from being forced out of their habitat.

The Draft EIR's Air Quality chapter, and particularly Section 2.3.5, Impact Analysis therein, comprehensively evaluates the project's construction-related air quality impacts, including those attributable to blasting . Please refer to **Topical Response AQ-1**.

The comment addresses general subject areas, which received extensive analysis in the Draft EIR, specifically in Section 2.3, Air Quality. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -269-3** The commenter explains that homeowners would be subjected to noise and air quality impacts associated with blasting.

The Draft EIR's Air Quality chapter, and particularly Section 2.3.5, Impact Analysis therein, comprehensively evaluates the project's construction-related air quality impacts, including those attributable to blasting. Please refer to **Topical Response AQ-1**. Please refer to **Topical Response NOI-1**. Noise and vibration impacts associated with Project construction, including blasting were analyzed in Section 2.10, Noise of the Draft EIR.

The comment addresses general subject areas, which received extensive analysis in the Draft EIR, specifically in Section 2.3, Air Quality. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

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- I -269-4** The commenter asks if the developer is developing in an appropriate area if they have to resort to blasting.

This comment is general in nature and does not raise any specific issue regarding any particular analysis in the Draft EIR. Therefore, no specific response can be provided or is required. (*Paulek v. California Dept. Water Resources* (2014) 231 Cal.App.4th 35, 47 [a general response is all that is required to a general comment]). This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -269-5** The comment states that the General Plan took 10 years and millions of dollars to develop and when it was approved, the County agreed to downzone the property to 99 from 200 dwelling units. The commenter urges the County to recommend against the project to safeguard the General Plan.

Please refer to **Topical Response LU-1**

- I -269-6** The comment states that the project is proposed in a sensitive area and if the project is developed, it would sever critical north/south and east/west corridors.

For information on wildlife corridors and connectivity refer to **Topical Response BIO-2**. The County acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.

- I -269-7** The comment states that the project sought special treatment, or a “carve out” of the regional biological mitigation plan, before the plan has been adopted by the County, and federal and state wildlife agencies.

As detailed in the Draft EIR, the project has been identified as a proposed hardline area in the draft North County MSCP, which means both the project’s development areas and biological open space areas have been incorporated into the overall conservation strategy of the draft plan. (Draft EIR, p. 2.4-82, 2.4-6.) The County acknowledges that the Draft NC MSCP is currently in draft form and has not yet been approved. See Topical Response BIO-1. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

- I -269-8** The comment states that the project would result in significant impacts to cultural resources by expanding Deer Springs Road.

As stated in Section 2.5, improvements to Deer Springs Road may result in direct impacts to unanticipated significant archaeological deposits from CA-SDI-4558

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located beneath the surface along the current road shoulders. Additionally, during excavation, there is potential to discover human remains. However, these impacts would be mitigated to a less than significant level.

The County acknowledges the comment and notes it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

- I -269-9** The comment states that the project would generate 28,000 new trips per day on local roadways and would bring I-15 traffic to an LOS F.

The comment is general in nature and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Given that the comment is general, a general response is all that is required. (*Paulek v. California Dept. Water Resources* (2014) 231 Cal.App.4th 35, 47-52.) Therefore, no further response is required or needed.

- I -269-10** The comment states the project would widen Deer Springs Road and build a new I-15 interchange, drawing cut through commuters. The comment states that the developer would begin construction before Caltrans finishes its analysis and approves a redesigned interchange.

The project has identified feasible mitigation in the form of building a new interchange and that mitigation measure is identified herein as M-TR-1. The process of implementing the mitigation for the interchange is subject to a three-phase process under the jurisdiction of Caltrans. The first phase involves the preparation of a Project Initiation Document (PID) consisting of a Project Study Report-Project Development Support (PSR-PDS) document. The purpose of the PSR-PDS document is to define the purpose and need for any proposed improvements, identify a reasonable range of alternatives (i.e., interchange configurations), and develop an action plan for implementation of the improvements. In 2014, in response to the project's traffic impact analysis, which identified significant direct and cumulative impacts to the Interchange, the project applicant initiated the PID process with Caltrans to begin evaluating different configurations for mitigating impacts to the Interchange.

After completion of the PID phase and approval of the PSR-PDS document, the process advances to the second phase known as the Project Approval and Environmental Document (PA&ED) process. The PA&ED process includes an appropriate CEQA/NEPA environmental document for the proposed improvements, including consideration of alternative configurations and a Project Report (PR),

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which constitutes an engineering technical document that serves as the basis for detailed construction plans.

At the conclusion of the PA&ED process, Caltrans will select an Interchange configuration and the process enters the third phase, which involves the Plans Specification and Engineering Phase (PS&E), where detailed engineering documents and construction plans are prepared for the Interchange. Finally, the PS&E phase is followed by the acquisition, if any, of any required right-of-way and construction of the new Interchange.

All aspects included in the process of implementing the mitigation for the Interchange improvements are subject to Caltrans' review, oversight, and approval. As of this writing, Caltrans is within the first PID phase. Caltrans has not completed this phase nor initiated the PA&ED phase. To date, the PSR-PDS document includes preliminary interchange alternatives consisting of an expanded diamond interchange, a diverging diamond interchange, and a roundabout interchange.

The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -269-11** The comment states the Vallecitos Water District projects a water deficit for the next 20 years and a 36% water supply cut to existing customers would occur to serve the project.

Refer to **Topical Response UTL-2**. The Twin Oaks Valley Property Owner's Association made the same or similar comment in a newspaper ad, noting that "36% cuts to resident's water supply" would be required so as to serve the proposed project. The Vallecitos Water District responded by posting on its website a "Correction of Misinformation." According to the District, it is not mandating the rationing of its water supplies to existing District customers (by 36% or any percentage), so as to be able to serve any proposed new development, including the Newland Sierra project. For that reason, the District considered the Twin Oaks' statement "false," requiring correction. See Topical Response to Comment (**TR-UTL-2 Reduction in Water Consumption for Existing Residents**). The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -269-12** The comment states the project is in a "Very High Fire Hazard Severity Zone" and the project would not provide enough emergency access routes in the event of a fire and gridlock during an evacuation would compromise the safety of the region.

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The County acknowledges the comments and notes that it addresses general subject areas, wildland fire evacuation, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

Nonetheless, please refer to **Topical Response HAZ-1** which notes that, the Draft EIR notes that while prior evacuations within the project vicinity have experienced traffic congestion, the project includes improvements to Deer Springs Road, which would increase capacity of the main evacuation route compared to the existing condition. Further, when compared to the existing condition, improvements to North Twin Oaks Valley Road and Buena Creek Road would expand the traffic network capacity to assist evacuation efforts for the surrounding community.

The Evacuation Plan also provides that “fire and law enforcement official will identify evacuation points before evacuation routes are announced to the public. Evacuation routes are determined based on the location and extent of the incident and include as many pre-designated transportation routes as possible.” Accordingly, the Draft EIR, Appendix N-2 “defers to Law Enforcement and Office of Emergency Services” because, “among the most important factors for successful evacuations in urban settings is control of intersections downstream of the evacuation area.”

I -269-13 The comment states that the County spent 10 years and millions of dollars developing the General Plan, which protected and downzoned the project area.

The County acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

I -269-14 The comment states that the County has not completed their Climate Action Plan; therefore, the County should not consider the project until the Climate Action Plan is complete. The comment states that the Golden Door and Sierra Club recently won a trial court decision invalidating the County’s threshold for measuring GHG impacts.

The County refers the commenter to **Topical Response GHG-3** regarding the County’s 2018 CAP. The County adopted its CAP on February 14, 2018.

Regarding the invalidated GHG threshold, the County acknowledges the comment and notes the proposed project did not use the Efficiency Metric for analyzing the proposed project’s impacts. Refer to **Response to Comment O-1-186**. This comment

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is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.