

## **RESPONSES TO PUBLIC COMMENTS RECEIVED DURING PUBLIC REVIEW AUGUST 9, 2018 – SEPTEMBER 24, 2018**

### **Response to comments received from Valle de Oro Community Planning Group**

- A-1 The County appreciates the review and comments from the Valle de Oro Community Planning Group (VDOCPG) in its letter dated September 9, 2018. The County acknowledges VDOCPG's concerns regarding the use of a Mitigated Negative Declaration (MND). Consistent with CEQA Statue § 21064.5, a MND was prepared because revisions in the Project plans and proposals made by or agreed to by the Project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record, there is no substantial evidence that the Project as revised will have a significant effect on the environment. No changes were made to CEQA documentation as a result of this comment.
- A-2 The County appreciates this comment from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding open space easements in relation to past Project approvals.

The MND identifies that the Project would develop a 8.9 acre site with a retirement center (Project site), which is currently designated as Open Space-Conservation within the General Plan, thereby requiring a General Plan Amendment. The project also requires a Rezone and Major Use Permit. Mitigation of the Project's potential impacts on biological resources proposed biological open space easements on two parcels along the south side of Campo Road (SR94), the West Mitigation Parcel and East Mitigation Parcel. The West Mitigation Parcel is 7.5 acres and the East Mitigation Parcel is 7.4 acres.

The Biological Letter Report for the Project identified significant impacts to approximately 5.8 acres of sensitive Diegan coastal sage scrub, 0.6 acre of non-native grassland, Palmer's goldenbush, San Diego sunflower, unique coast cholla patches, California gnatcatcher, orange-throated whiptail and raptor foraging habitat. Mitigation for significant impacts to coastal sage scrub, non-native grassland, Palmer's goldenbush, San Diego sunflower, orange-throated whiptail, raptor foraging habitat, and California gnatcatcher was proposed to be provided within the two mitigation parcels located south of SR 94, south and southeast of the Project site. The Project site and both mitigation parcels are currently owned by Skyline Church and have no dedicated open space easements.

The comments from VDOCPG (and from the Sierra Club, below) resulted in a staff re-examination and clarification of how the Project's proposed mitigation parcels

are related to past Project approvals. A Final Environmental Impact Report (EIR) that analyzed the first church proposal was certified March 1 1991. A Final Subsequent Environmental Impact Report that was certified August 21, 1996, analyzed changes to the original proposal. Changes included moving the church on the property, redesigning the campus, and adding a cemetery. Review of the past EIRs, decision documents, and plot plans showed that the current 8.9-acre Project site proposed for the retirement center was not included in any prior mitigation for the approved and constructed church development.

The August 21, 1996 Final Subsequent Environmental Impact Report (EIR) and May 29, 1996 "Additional Information Statement" both discuss the 8.9 acre Project site. The Additional Information Statement includes the following: "It is important to note, however, that the acquisition of the Via Mercado parcel is not required to mitigate significant impacts to biological resources nor is it included as part of the proposed Project." Therefore, the Project site was not part of any prior mitigation for the previously approved and constructed larger church development and there was no prior project condition that required preservation of this site. It should be noted that the 8.9 acre Project site was not owned by the church during the time of the prior 1996 EIR was certified and the 1996 Project approvals (SPA 94-001, MUP Mod P88-039-W1, MUP 95-001, R 94-005, TM 5059) were granted. Past Project approvals and analysis did not include the Project site as part of Project mitigation. Therefore, the Project site is eligible for the proposed General Plan Amendment.

Additional review of the past documents (EIRs, decision documents, tentative map, and plot plans) concluded that the documents identify the large area to the north and east of the church site for a required open space easement. This easement was established. The documents also show that the 7.5 acre West Mitigation Parcel was not included as part of any prior mitigation for the previously approved and constructed larger church development. Therefore, the Western Mitigation Parcel is eligible for dedication of open space to mitigate Project impacts.

The additional review of the past documents resulted in inconclusive evidence regarding the East Mitigation Parcel and its relation to past Project approvals. In light of this, the Applicant has removed the East Mitigation Parcel from the Project's proposal for mitigation. Instead, mitigation requirements that would have been satisfied by the East Mitigation Parcel will be satisfied at an alternative offsite mitigation parcel that has yet to be determined. This mitigation will be a condition of the Major Use Permit approval for the Project. The Applicant also will dedicate an open space easement over the East Mitigation Parcel in order to resolve concerns about past requirements for this parcel.

As a result of this comment, the Biological Letter Report has been revised to clarify the situation. In turn, the Initial Study Section IV, Biological Resources, the

biological mitigation measures in the Mitigated Negative Declaration, and the Ordinance Compliance Checklist have been clarified as well.

The Major Use Permit Decision will include a finding that the revised mitigation measures are equivalent to or more effective than the draft measures in mitigating potential significant effects and that the revised measures themselves will not cause any potentially significant effect on the environment.

A-3 The County acknowledges and appreciates the VDOCPG reference to the April 7, 1996 letter. The commenter is correct in stating the April 7, 1996 VDOCPG letter requests the acquisition, restoration and preservation of the Project site to mitigate impacts. However, review of the past EIRs, decision documents and plot plan provide evidence the Project site was not part of any prior mitigation for the previously approved and constructed larger church development. Please see response A-2 above. No changes were made to CEQA documentation as a result of this comment.

A-4 The County acknowledges and appreciates the VDOCPG reference to the May 23, 1996 Staff Report. Review of the past EIR shows the May 29, 1996 "Additional Information Statement" information was incorporated into the August 26, 1996 Final Subsequent EIR. Please see response A-2 above.

Review of the past EIRs, decision documents and plot plan provide evidence the Project site was not part of any prior required biological or community character mitigation for the previously approved and constructed larger church development, and there was no prior project condition that required preservation of this site. It should be noted that the 8.9 acre Project site was not owned by the church during the time of the prior EIR was certified and MUP was issued. Therefore, past project approvals and analysis did not include the Project site in the analysis or as part of Project mitigation and the 8.9 acre Project site is not identified on the approved Plot Plan for the prior EIR and MUP. Therefore, the Project site was not conditioned to be granted into an open space easement as mitigation for any past Project impacts or approvals. No changes were made to CEQA documentation as a result of this comment.

A-5 The County appreciates this review and comment from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding cumulative analysis for the Project. As explained in response A-2, the project site was not required as mitigation for and was not part of the church project. The MND for the Project takes into account and provides analysis for the whole of the action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts. No changes were made to CEQA documentation as a result of this comment.

- A-6 The County acknowledges and appreciates the VDOCPG reference to the June 4, 1996 letter. The commenter is noted in stating this letter identifies the initial willingness regarding the acquisition and preservation of the Project site. However, the 1996 church project approvals did not require the current Project site to be utilized as part of mitigation for biological or any other environmental impacts. See response A-2 and A-4. No changes were made to CEQA documentation as a result of this comment.
- A-7 The County appreciates this comment from the VDOCPG in its letter dated September 9, 2018. Please see response A-2. No changes were made to CEQA documentation as a result of this comment.
- A-8 The County appreciates this comment from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding use of parcels for open space for past Project approvals. The East Mitigation Parcel is no longer proposed as mitigation for the current project. Please see response A-2, including changes to the CEQA documents.
- A-9 The County appreciates this review and comment from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the boundaries of the Rancho San Diego Specific Plan Area.

The comments from VDOCPG resulted in a staff re-examination and clarification regarding the location of the Project site in relation to the Rancho San Diego Specific Plan boundaries. This included re-examining: the original Rancho San Diego Specific Plan SP 79-05 (approved January 16, 1980); the Environmental Impact Report for the original Rancho San Diego Specific Plan (certified September 27, 1979); Rancho San Diego Specific Plan Amendment SPA87-001 (approved March 6, 1988); the Final Environmental Impact Report for Rancho San Diego Specific Plan Amendment SPA87-001 (certified March 6, 1988); and Rancho San Diego Specific Plan Amendment SPA13-001 (approved December 4, 2013); and GIS data information. This research conducted by County staff reaffirmed that the 8.9 acre Project site is not located within the Rancho San Diego Specific Plan area. (See Responses to Comments Appendix A.) It should be noted that the existing church development is located within the Rancho San Diego Specific Plan area and the formerly proposed east mitigation parcel also is located in the Rancho San Diego Specific Plan. However, these areas would not undergo any land use changes from implementation of the Project and do not require any Specific Plan Amendments. Therefore, the Project site is not located within the Rancho San Diego Specific Plan. The MND does not analyze the Rancho San Diego Specific Plan because it is not located within the Specific Plan area and a Rancho San Diego Specific Plan Amendment is not required. No changes were made to CEQA documentation as a result of this comment.

A-10 The County appreciates this review and comment from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the boundaries of the Rancho San Diego Specific Plan Area. The comment refers to an e-mail of May 20, 2016 stating that the maps in the Specific Plan are difficult to interpret. The Specific Plan Amendment referred to in the e-mail is SPA13-001 (approved December 4, 2013). The e-mail went on to explain that staff found an earlier document, a Final Environmental Impact Report (FEIR), with a clearer map. The FEIR referred to was for SPA87-001. The FEIR was certified and the Specific Plan Amendment was approved on the same date, March 16, 1988. The comments from VDOCPG resulted in a staff re-examination and clarification regarding the location of the Project site in relation to the Rancho San Diego Specific Plan boundaries, including a review of the most current Specific Plan, SPA13-001. Please see response to comment A-9. No changes were made to CEQA documentation as a result of this comment.

A-11 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the boundaries of the Ranch Specific Plan Area.

The text on page 1 of the Rancho San Diego Specific Plan refers to the 1996 SPA 94-001 and the 1991 SPA 88-004 and discusses these areas being designated within the plan as institutional areas. The Project site has an existing land use designation of Open Space-Conservation, not institutional. The 8.9 acre Project site was also not owned by the church during the time the 1996 EIR was certified and Project approvals (SPA 94-001, MUP Mod P88-039-W, MUP 95-001, R 94-005, TM 5059) were granted. The Project site was not included in the earlier 1991 project nor was the Project site owned by the church when the earlier EIR was certified and approvals were granted for the church in 1991 (GPA91-02, SPA88-004, R88-013, P88-039). Please see responses A-2 and A-9.

The text on page 5 of the Rancho San Diego Specific Plan refers to the 1996 SPA 94-001, which did not include the Project site. Please see response A-2. Open space upland habitat area references on this page refer to the East Mitigation Site and do not identify the Project site as part of the Rancho San Diego Specific Plan.

The table on page 7 and 8 of the Rancho San Diego Specific Plan refers to the Specific Plan Land Uses that would occur under SPA 94-001. SPA 94-001 did not include the Project site. Please see response A-2 above.

The text on page 24 of the Rancho San Diego Specific Plan makes no reference to the Project site or church property and is instead referencing the Rancho San Diego Village shopping center.

The text on page 25 of the Rancho San Diego Specific Plan refers to the Specific Plan Land Uses that would occur under SPA 94-001. SPA 94-001 did not include the Project site. Please see response A-2 above.

No changes were made to CEQA documentation as a result of this comment.

- A-12 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the boundaries of the Rancho San Diego Specific Plan Area and the preparation of an EIR. Please see response to A-1, A-9 and A-11. No changes were made to CEQA documentation as a result of this comment.
- A-13 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the re-designation of open space in the context of a scenic highway. Potential impacts to scenic highways are evaluated within Section I. Aesthetics, questions I.a) and I.b) of the MND. As stated in this analysis, the Project site is not visible from any State scenic highway although the Project site is located on a County scenic highway. Based on a site visit by County staff, photo simulations and a detailed analysis of visual compatibility, the Project was determined to be compatible with the existing visual environment in terms of visual character and quality. The Project would not damage scenic resources along the County scenic highway and no mitigation is required. No changes were made to CEQA documentation as a result of this comment.
- A-14 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the aesthetics of the Project's sound wall. As a design feature, the Project is proposing an 8-foot wall along the top of slope along Campo Road. The visual impacts associated with this wall are provided in the MND's photo simulations, which were included in the analysis of potential impacts to visual character and quality in the area. Please refer to response A-13 regarding visual impacts to scenic highways. As discussed in MND question I.a, based on a site visit by County staff, photo simulations and a detailed analysis of visual compatibility the Project, including the construction of the noise wall, was determined to be compatible with the existing visual environment in terms of visual character and quality. The Landscape Concept Plan dated September 11, 2017 proposes the planting of street and small trees to screen and soften the appearance of the noise wall. The project would not damage scenic resources along the County scenic highway or damage community character and no mitigation is required. No changes were made to CEQA documentation as a result of this comment.

- A-15 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding compatibility with the General Plan and community character. Please refer to response A-13 and A-14. Within the MND, Section X, Land Use and Planning, question b) evaluates the Project's consistency with existing applicable land use plans, including the General Plan. As discussed in this section, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect. No changes were made to CEQA documentation as a result of this comment.
- A-16 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the Project's consistency with community character and views. Please see response to A-13 and A-14 above. No changes were made to CEQA documentation as a result of this comment.
- A-17 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding traffic safety as it relates to the possible increased risk of rear-end accidents as more vehicles would be turning right from westbound Campo Road into the private entrance. Campo Road (SR-94) is classified as a Freeway/Expressway on the San Diego County Mobility Element map with a posted speed of 55 miles per hour. The current intersection includes three through (westbound) lanes. The right hand lane is a combination right turn and through lane. This lane currently handles 1,852 AM peak hour trips and 1,587 PM peak trips through the intersection. This lane currently handles 12 AM peak hour right-hand turn trips and 11 PM peak hour right-hand turns. The facility would add a total of 708 average daily trips (ADT's). All 100% of these trips will access the site from westbound Campo Road and would turn right into the existing driveway. This project would add 16 AM peak hour right-hand turn trips and 29 PM peak hour right-hand turn trips. If you combine the existing and proposed right hand turns the total AM peak hour would equal 28 turns and the PM peak hour would equal 40 turns. The level of service on the through right-hand lane would prohibit changing this lane into a right-hand turn only lane. The threshold to require an additional dedicated right-hand turn lane is 300 peak hour trips, which would not be met with the existing plus proposed number of trips.

The driveway entrance will not be blocked by other cars and would have enough room to safely turn into the driveway. Drivers also do not need to stop to make this turn, just to slow down from the expected speed on westbound Campo Road. There is adequate sight distance from trailing drivers at the expected speeds to notice brake lights and turn signals of the turning cars to react when the car in front is turning. Therefore, no safety concerns are warranted regarding rear-

end accidents in this circumstances. No changes were made to CEQA documentation as a result of this comment.

- A-18 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The comments from VDOCPG resulted in a staff re-examination and clarification regarding the location of the Project site in relation to biological resource impacts, the cactus wren, and other species referred to by the commenter.

The comment lists some species that were included in the Biological Resources Letter Report for the Project. These include Palmer's goldenbush, San Diego sunflower, California gnatcatcher, orange-throated whiptail, San Diego desert woodrat, and raptors including red-tailed hawk. The MND fully analyzed the potential biological impacts on these species from the Project and concluded that any potential significant impacts on them would be adequately mitigated.

The comment lists other species that were included in "previous biological surveys". Review of the past EIR, decision document, and plot plan provide evidence the Project site was not included in any past biological resource surveys.

Further research was conducted to substantiate whether or not cactus wren was documented on the Church site or adjacent to the site. The following documents were reviewed:

- Draft Subsequent Environmental Impact Report for the Proposed Skyline Wesleyan Church at Rancho San Diego (February 1996),
- Final Subsequent Environmental Impact Report for the Proposed Skyline Wesleyan Church at Rancho San Diego (August 1996), and
- Final Environmental Impact Report for Rancho San Diego Specific Plan Amendment (August 1987).

As stated above, these documents did not include the 8.9 acre Project site. No cactus wrens were documented on the Skyline Church Site, or on the Rancho San Diego Specific Plan Amendment in the vicinity of the Skyline Retirement Center project site. If the commenter has a report documenting cactus wren onsite it should be provided for County review. However, cactus wren was not found onsite during the biological consultant's nine site surveys between 2014 and 2017, nor by the County biologist that detected gnatcatcher onsite in 2016. Even so, translocation of coast cholla cactus, important cactus wren habitat, is included as a condition for the Project.

Other species listed in the comment as included in "previous biological surveys" (greater roadrunner, and Scott's oriole) are not protected species, but nesting of these species is protected by federal and State law. Therefore, any potential significant impacts on would be adequately mitigated.



No changes were made to CEQA documentation as a result of this comment.

- A-19 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. This statement is correct in identifying the proposed Project would have direct and indirect impacts to biological resources. Within the MND, Project specific biological resource impacts are identified in Section IV. Biological Resources a), b) and e). These analyses identify that biological resource impacts would be less than significant with mitigation incorporated. As stated in response A-2, the East Mitigation Parcel is no longer proposed as mitigation for the current project. Instead, mitigation requirements that would have been satisfied by the East Mitigation Parcel will be satisfied at an alternative offsite mitigation location. No changes were made to CEQA documentation as a result of this comment.
- A-20 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the Project's mitigation ratio. Mitigation for impacts to protected vegetation and animal species is provided in accordance with County, state, and federal regulations. Additionally, there are no existing open space easements on the Project site, please see response A-2. No changes were made to CEQA documentation as a result of this comment.
- A-21 The County appreciates the review and comments from the VDOCPG in its letter dated September 9, 2018. The County acknowledges VDOCPG's concern regarding the consistency with community character and the use of a MND. Please refer to response A-1 and response A-15.

#### **Responses to letter received from the Sierra Club**

- B-1 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges receipt of the Sierra Club's California Housing Policy report and appreciates the groups concerns regarding the need to protect the environment when developing housing. No changes were made to CEQA documentation as a result of this comment.
- B-2 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges Sierra Club's questions and concerns regarding the determination of potentially significant biological and GHG/climate change impacts. The County appreciates the opportunity to address the following comments. No changes were made to CEQA documentation as a result of this comment.

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- B-3 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges Sierra Club's request to recirculate the MND, based upon the comments identified within the letter. CEQA Guideline Section 15073.5(c) only requires recirculation of an MND when a new, avoidable significant effect occurs or new mitigation measures are required. CEQA Guideline Section 15073.5(c) does not require recirculation when mitigation measures are replaced with equal or more effective measures. Please see response A-2. As a result of VDOPG and Sierra Club comments, the Biological Letter Report has been revised to clarify the Project's mitigation proposal. In turn, the Initial Study Section IV, Biological Resources, and the Ordinance Compliance Checklist have been clarified as well. The revisions do not require recirculation per CEQA Guideline Section 15073.5(c).
- B-4 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. This comment summarizes the Project. No changes were made to CEQA documentation as a result of this comment.
- B-5 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges Sierra Club's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- B-6 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. This comment summarizes the Project. No changes were made to CEQA documentation as a result of this comment.
- B-7 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges Sierra Club's concern regarding mitigation of San Diego sunflower individuals.

Project mitigation for San Diego Sunflower occurs in the form of habitat based mitigation that will occur through purchase and preservation of habitat, specifically in the form of coastal sage scrub. This mitigation approach is considered acceptable for CRPR 4 Species. As noted in the CNPS Inventory of Rare and Endangered Plants, this species is "Locally Common in Southern SDG. CO." Coastal sage scrub in the offsite mitigation parcel south of State Route 94 contains San Diego Sunflower. Additional coastal sage scrub mitigation land purchased offsite is likely to support San Diego Sunflower because the offsite coastal sage scrub mitigation land will also be within southern San Diego County. This mitigation, in combination with other requirements, will reduce the Projects impacts to below a level of significance. No changes were made to CEQA documentation as a result of this comment.

- B-8 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges Sierra Club's concern regarding the NAP habitat area and the long-term viability of the San Diego sunflower.

The NAP San Diego sunflower area in question is not intended to provide for the long-term viability of the San Diego sunflower. This portion of the site is neither impacted nor preserved. Long-term viability of the San Diego sunflower species is to be supported by the San Diego Sunflower habitat-based Project mitigation. Coastal sage scrub mitigation will provide suitable preserved habitat. Coastal sage scrub in the West Mitigation Parcel includes San Diego sunflower, as well as CRPR 4 Ashy Spikemoss, which was not found on the project site. The additional coastal sage scrub mitigation that is required to be purchased offsite will also likely support San Diego sunflower because the offsite coastal sage scrub mitigation will be in southern San Diego County.

Translocation is not an option because translocation requires removing San Diego sunflower from the NAP area, which would result in direct impacts to San Diego sunflower in the NAP area, which is not a part of the Project. In-perpetuity maintenance of the West Mitigation Parcel includes invasive species removal, which is expected to increase cover and quality of native species, including the San Diego sunflower already growing in that location. Promotion of natural recruitment within occupied habitat that has an existing San Diego sunflower seedbank is more likely to successfully increase numbers, with lower use, than alternatives. Self-sowing of naturally occurring onsite seed in the mitigation area is considered a superior method to application of offsite seed for reasons of genetic integrity. No changes were made to CEQA documentation as a result of this comment.

- B-9 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges Sierra Club's concern regarding off-site mitigation land.

On the offsite West Mitigation Parcel, on the south side of SR94, two zoning districts (Use Regulations) apply. Most of the site, approximately 5.8 acres, is zoned Open Space (S80), while the southern portion of approximately 1.7 acres is zoned Holding Area (S90).

The Open Space Use Regulations (S80) are intended to provide for appropriate controls for land generally unsuitable for intensive development. Typically, the S80 Use Regulations would be applied in both urban and rural environments to hazard or resource areas, public lands, recreation areas, or lands subject to open space easement or similar restrictions. This zoning designation does not indicate that the open-space-zoned area is already required to be maintained as natural open

space. The Holding Zone (S90) zoning is intended to prevent isolated or premature land uses from occurring on lands for which adequate public services and facilities are unavailable or for which the determination of the appropriate zoning regulations is precluded by such things as a lack of data. Allowable uses in both the S80 and S90 zones include residential and agriculture, among others. Placing a biological conservation easement on the property, with a Resource Management Plan, will provide protection for the mitigation sites that does not now exist. In addition, as explained in the response to comment A-2, the West Mitigation Parcel was never set aside as open space to mitigate for another project's biological impacts; therefore use of the site as mitigation for this project's impacts is appropriate.

All of the East Mitigation Parcel is zoned Open Space (S80). As explained in the response to comment A-2, the Applicant has removed the East Mitigation Parcel from the Project's proposal for mitigation for the project. Instead, mitigation requirements that would have been satisfied by the East Mitigation Parcel will be satisfied at an alternative offsite mitigation parcel. The Applicant also will dedicate an open space easement over the East Mitigation Parcel in order to resolve concerns about past requirements for this parcel.

In addition, preservation and in-perpetuity management of biological open space is the method of upland habitat mitigation specified in and required by the County MSCP Subarea Plan, which is a Natural Communities Conservation Plan approved by the County, USFWS, and CDFW. As a result, this is an acceptable and appropriate method of mitigation for the project. No changes were made to CEQA documentation as a result of this comment.

- B-10 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges Sierra Club's identification of a typo within the Global Climate Change Evaluation (GCCE). The sentences in Section 2.1 on page 22 should have referenced the Rancho San Diego rather than Valley Center region but the statements are accurate for the project site concerning the description of the onsite vegetation and anticipated carbon sequestration by that vegetation. The correction of this typo does not result in a substantial revision to the document, such as identifying a new, avoidable significant effect or remodeling of calculations. Therefore, consistent with CEQA Guideline Section 15073.5, recirculation of the document is not required due to this typo. As described in CEQA Guideline Section 15151, perfection in CEQA documents is not required, but rather a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. The typos have been corrected in the report. No other changes were made to CEQA documentation as a result of this comment.

- B-11 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County acknowledges receipt of the two letters written by Chatten-Brown & Carstens LLP, provided as context. The letters do not pertain directly to the Skyline Retirement Center project. No changes were made to CEQA documentation as a result of this comment.
- B-12 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. This comment describes the September 18, 2018 letter to the County in which Sierra Club requested the County to not consider for approval any projects that include a General Plan Amendment and rely on offsite carbon credit purchases, in light of the San Diego Superior Court's issuance of a stay and injunction on September 14, 2018, and that an *ex parte* hearing was requested on September 25, 2018.

The Petitioners' *Ex Parte* applications for OSC re Contempt were denied without prejudice by the court (Dept. 72) on September 25, 2018. Again, the September 18, 2018 letter was provided by the commenter as context for following comments and is not directed specifically at the Skyline Retirement Center project. However, in response to a lawsuit filed against the County in March 2018, the San Diego Superior Court issued a writ in December 2018 ordering approval of the CAP and it's EIR to be set aside. This writ enjoined reliance of the CAP's mitigation measure M-GHG-1 which allows for purchase of carbon credits from local to international sources. The County appealed the Superior Court ruling which stayed the writ allowing the CAP and it's EIR to remain in place. The project GHG technical report still includes the purchase of carbon credits to mitigate project GHG emissions. No changes were made to CEQA documentation as a result of this comment.

- B-13 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. This comment describes the September 7, 2018 letter to the City of Oceanside as pertaining to the use of inappropriate and arbitrary lifecycle periods for calculating project GHG emissions and the use of offsite carbon credits. The letter to the City of Oceanside was provided by the commenter as context for following comments and is not directed specifically at the Skyline Retirement Center project. No changes were made to CEQA documentation as a result of this comment.
- B-14 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County agrees that Table 5 in the GCCE Report presents a summary of project annual greenhouse gas (GHG) emissions after factoring in all proposed onsite GHG reduction measures. Table 6 in the Report is a summary of annual project total operational emissions for years 2020 through 2049. No changes were made to CEQA documentation as a result of this comment.

- B-15 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County disagrees with the sentence as stated. Proposed mitigation measure GHG-1 in the GCCE report applies to construction emissions only and requires purchase and retiring of carbon offsets in a quantity to offset 100% of the project's construction emissions, prior to the approval of the first grading permit. Proposed mitigation measure GHG-2 in the GCCE report applies to operational emissions and requires purchase and retiring of carbon offsets in a quantity to offset those emissions for a 30-year period (to net zero emissions).

As a result of this comment, the County recognized an inconsistency between the GCCE report and the mitigation measure included in the draft Mitigated Negative Declaration (MND). Mitigation measure GHG#1 in the MND has been revised to make it consistent with project mitigation measure GHG-1 in the GCCE report and to be specific to offsetting project construction emissions.

In addition, mitigation measure GHG#2 has been added to the MND to be consistent with project mitigation measure GHG-2 in the GCCE report and to be specific to offsetting the project operational emissions. Also, in the GCCE report, GHG-2 has been corrected to refer only to buildings permits and delete reference to a Site Plan for a Special Area Regulations "D" Designator because there is no such Designator on this site.

Please refer to the response to comment B-25 for the revised MND mitigation measures GHG#1 and GHG#2. These revisions further clarify the proposed measures to offset construction and operational emissions of GHGs and do not require recirculation.

- B-16 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The comment states that this approach reflects the County's recently adopted Climate Action Plan, which allows credits to be obtained from local, regional, statewide, or even global sources. The sixth performance standard for project mitigation measure GHG-1 and seventh performance standard for GHG-2 allow for consideration of credits to be obtained from local, regional, statewide, or even international (global) sources.

These mitigation measures do not conflict with the mitigation measures contained in the Supplemental EIR prepared for the CAP. The SEIR's mitigation measure GHG-1 (M-GHG-1) requires projects that include a GPA to reduce their emissions to ensure that CAP emissions forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved. Options 1 and 2 of M-GHG-1 allow for offsite mitigation including purchase of carbon offset credits after all feasible onsite design features and mitigation measures have been incorporated, including from local, regional, statewide, or international sources.

Thus, the GHG mitigation approach for the proposed project does not conflict with CAP SEIR M-GHG-1.

However, in response to a lawsuit filed against the County in March 2018, the San Diego Superior Court issued a writ in December 2018 ordering approval of the CAP and its EIR to be set aside. This writ enjoined reliance of the CAP's mitigation measure M-GHG-1 which allows for purchase of carbon credits from local to international sources. The County appealed the Superior Court ruling which stayed the writ allowing the CAP and its EIR to remain in place.

No changes were made to CEQA documentation as a result of this comment.

- B-17 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The commenter is correct in that PDS does not provide any guidance specific to private development projects for creating GHG emissions reduction credits onsite. PDS does consider (to the satisfaction of the Director of PDS) the geographic priorities for private projects to obtain GHG emission reduction credits as stated in the sixth and seventh performance standards of Skyline Retirement Center's proposed mitigation measures GHG-1 and GHG-2, respectively, listed in the GCCE report. The quote contained in the comment is the last sentence of these two performance standards.

As a result of this comment, the sixth and seventh performance standards have been revised to remove the last sentence as the County has no requirement that local GHG reduction offset projects be financially competitive in the global offset market.

- B-18 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The comment alleges that financial underpinnings of the project's mitigation measures will result exclusively in the purchase of the cheapest carbon offset purchases that will most likely be from international sources.

As stated in the previous response to comment B-17, the sentences in the sixth performance standard for project mitigation measure GHG-1 and seventh performance standard for GHG-2, which required local GHG offset project and programs to be financially competitive in the global offset market, have been removed. The stated performance standards allow for consideration of GHG offset credits to be obtained from local, regional, statewide, or even international (global) sources, to the satisfaction of the Director of PDS. However, the purchased carbon credits must achieve real, permanent, quantifiable, verifiable, and enforceable reductions. Thus, the project will not automatically be allowed to go straight to purchasing credits from potentially lower-cost international sources after proposing onsite GHG reduction measures.

- B-19 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The comment is correct in that the GCCE Report limits its analysis to a 30-year project life and that projected/estimated emissions for that 30-year period are addressed by the project's mitigation measures. The comment is not correct in that project emissions are still calculated to be approximately 960 MTCO<sub>2</sub>e per year after year 30 (2049), as the Table 6 of the GCCE Report does not project emissions beyond year 30 ; however, Table 6 does provide an estimate that emissions will be approximately 960 MTCO<sub>2</sub>e in year 30.

The use of a 30-year lifecycle for the calculation GHG emissions that need to be mitigated is appropriate for the following reasons: 1) The California Air Resources Board (CARB) is the state agency charged with the responsibility for, and expertise to administer the state's GHG emissions policies. CARB has concurred with a 30-year lifecycle for purposes of CEQA evaluations intended to demonstrate a no net increase in GHG emissions; 2) The South Coast Air Quality Management District has identified the use of a 30-year project life for purposes of delineating the GHG offset obligations of residential/commercial projects; 3) The 30-year project life has been accepted as an industry standard by multiple lead agencies and expert consultants for analyzing GHG emissions in CEQA documents; and 4) It would be speculative to forecast beyond a 30-year project life in light of evolving policies, regulations, and standards that would be needed to achieve the 2050 horizon-year goal of EO-S-3-05. Speculation is contrary to CEQA Section 15145. No changes were made to CEQA documentation as a result of this comment.

- B-20 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The comment is correct in that the County does utilize a mitigation approach recommended by the South Coast Air Quality Management District (SQAQMD) including amortizing construction emissions over a 30-year period and adding those emissions to operational emissions for the 30-year period to evaluate potential impacts and significance. However, the proposed project's mitigation measure requires 100 percent of the project's construction GHG emissions (1,038 MTCO<sub>2</sub>E) to be offset prior to issuance of the project's first grading permit. No changes were made to CEQA documentation as a result of this comment.

- B-21 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The project's mitigation approach includes the reduction measures (project design features) listed in Table 4 of the GCCE Report and applies appropriate credit for those reductions to arrive at the project's total estimated GHG emissions in year 1 of the project as shown in Table 5 of the Report. The Report and MND do contend that potential impacts from project GHG emissions are reduced to less than significant.



No changes were made to CEQA documentation as a result of this comment. In addition, a condition has been added to the Mitigated Negative Declaration for clarity and to ensure the project implements a solar system that is consistent with the description of the system that was provided in Attachment B of the Global Climate Change Evaluation Report.

- B-22 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The County notes the commenters' opposition to the use of a 30-year lifecycle for the proposed project. Although the resources at the internet links contained in the comment describe building lifespan expectations as shorter than desired or expected, the reported lifespans still appear to be generally more than 30 years. Likewise, the proposed project for a retirement center for an independent and assisted-living population could be expected to be in use for more than 30 years. Please see response to comment B-19 above for why the use of the 30-year lifecycle is appropriate for analysis and mitigation of GHG emissions. No changes were made to CEQA documentation as a result of this comment.
- B-23 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. Please see response to comment B-19 above for why the use of the 30-year lifecycle is appropriate for analysis and mitigation of GHG emissions. No changes were made to CEQA documentation as a result of this comment.
- B-24 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. Please see responses to comments B-17 and B-18. No changes were made to CEQA documentation as a result of this comment.
- B-25 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. The comment asserts that the mitigation approach incorporating the use of non-local carbon offset credits is inconsistent with the County's General Plan and represents a temporary reduction of GHG emissions and not a 100% carbon offset as the project MND asserts.

The project's GCCE Report concludes that emissions of GHGs would be fully offset through the purchase of carbon credits. [This mitigation is consistent with the General Plan because it reduces project-related emissions at a level that aligns with the statewide reduction targets established by AB 32 and SB 32. Furthermore, General Plan Goal COS-20 does not discuss carbon offset credits or any other form of mitigation. It simply expresses the County's commitment to reduce county-wide GHG emissions and does not dictate how those emissions will be achieved. Furthermore, the use of carbon offset credits to mitigate significant cumulative impacts is consistent with the purpose and intent of the General Plan to address *global* climate change impacts as required by AB 32 and SB 32. The global nature of climate change was also recently highlighted by the California

Supreme Court (see Center for Biological Diversity et al., v. California Department of Fish and Wildlife, and The Newhall Land and Farming Company, 62 Cal. 4th 204, 219 (2015)). As a result, the use of carbon offsets for mitigation is consistent with the County's General Plan. (from Newland Sierra Topical Response GHG-1 (p. 83 and 84 June 2018))]

In addition, the County disagrees that the mitigation amounts to a temporary reduction for offsetting the project's emissions. Please refer to responses to comment B-19 above for why the use of the 30-year lifecycle is appropriate for analysis and mitigation of GHG emissions.

However, MND mitigation measures GHG#1 has been revised to make it consistent with project mitigation measure GHG-1 in the GCCE Report and be specific to offsetting project construction emissions as follows:

**GHG#1-CARBON OFFSET CREDITS-Construction Emissions**

**INTENT:** In order to offset 100% of the project's ~~annual total construction~~ GHG emissions, ~~for a 30-year period, in order to achieve carbon neutrality (i.e., a net zero emissions level),~~ carbon offset credits shall be purchased ~~for the amount of 1,038 MTCO2E.~~ **DESCRIPTION OF REQUIREMENT:**

The project applicant shall purchase and retire carbon offsets in a quantity sufficient to offset 100% of the project's construction emissions (1,038 MTCO2E). The purchased carbon offsets used to reduce project construction GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions (Cal. Health & Saf. Code section 38562(d)(1)). The credits must be purchased from an offset project included in a registry approved by the California Air Resources Board. The Project applicant or its designee shall submit proof to the County [DPW, PDCI, PDS], that offsets are unavailable and/or fail to meet the feasibility factors defined in CEQA Guidelines Section 15364 in a higher priority category before seeking offsets from the next lower priority category.

**DOCUMENTATION:** Applicant shall submit documentation that the carbon offset credits have been purchased after receiving approval from the County [DPW, PDCI, PDS] that the purchase of credits complies with the GHG requirements of this condition.

**TIMING:** Prior to approval of any grading or improvement plan or construction permit, and prior to use of the property in reliance of this permit, the offset credits must be purchased. **MONITORING:** ~~The [DPW, PDCI] shall make sure that the project applicant complies with the GHG requirements of this~~ The [DPW, PDCI] shall contact the [PDS, PCC] if the project applicant fails to comply with this condition. The Project applicant or its designee shall provide evidence to the satisfaction of the Director of the Planning & Development Services Department (PDS) that the Project applicant has purchased and retired carbon offsets in a quantity

sufficient to offset 100% of the construction GHG emissions (1,038 MTCO<sub>2</sub>E).

In addition, MND mitigation measure GHG#2 has been added to be consistent with project mitigation measure GHG-2 from the GCCE Report and be specific to offsetting the project operational emissions as follows:

**BUILDING PERMIT:** *(Prior to approval of any building plan and the issuance of any building permit associated with an implementing Site Plan).*

**GHG#2–CARBON OFFSET CREDITS-Operational Emissions**

**INTENT:** In order to offset 100% of the project's annual operational GHG emissions, for a 30-year period, and in order to achieve carbon neutrality (i.e., a net zero emissions level), carbon offset credits for the amount of 30,843 MTCO<sub>2</sub>E shall be purchased. **DESCRIPTION OF**

**REQUIREMENT:** The project applicant shall purchase and retire carbon offsets in a quantity sufficient to offset 100% of the project's incremental portion of the operational emissions associated with the implementing the Major Use Permit for a 30–year period (30,843 MTCO<sub>2</sub>E). The purchased carbon offsets used to reduce GHG emissions shall achieve real, permanent, quantifiable, verifiable, and enforceable reductions (Cal. Health & Saf. Code section 38562(d)(1)). The credits must be purchased from an offset project included in a registry approved by the California Air Resources Board. The Project applicant or its designee shall submit proof to the County [PDS], that offsets are unavailable and/or fail to meet the feasibility factors defined in CEQA Guidelines Section 15364 in a higher priority category before seeking offsets from the next lower priority category.

**DOCUMENTATION:** Applicant shall submit documentation that the carbon offset credits have been purchased after receiving approval from the County [PDS] that the purchase of credits complies with the GHG requirements of this condition.

**TIMING:** Prior to approval of any building plan or issuance of any building permit, the offset credits must be purchased. **MONITORING:**

The Project applicant or its designee shall provide evidence to the satisfaction of the Director of the Planning & Development Services Department (PDS) that the Project applicant has purchased and retired carbon offsets in a quantity sufficient to offset 100% of the construction GHG emissions (30,843 MTCO<sub>2</sub>E).

Another MND mitigation measure GHG#3 has been added to ensure the use of solar photovoltaic panels as described in the GCCE:

**GHG#3–PHOTOVOLTAIC PANEL SYSTEM(S)**

**INTENT:** The intent of this condition is to ensure implementation of the proposed photovoltaic panel system to offset 28% of the project's annual

electrical demand. **DESCRIPTION OF REQUIREMENT:** The project applicant shall install photovoltaic panel system(s) to offset 28% of the annual electrical demand of the project facilities. Appendix B of Global Climate Change Evaluation for Skyline Retirement Center, dated 12/19/2018, estimated the project would consume 2,075,600 kilowatt hours (KWH) per year. The project applicant must provide design details demonstrating that 28% of the project's energy would be generated through the photovoltaic system. This would amount to the generation 581,168 KWH per year OR another value as long as substantiation is provided by the project applicant. The necessary KWH can be produced through 1,200 panels with an estimated generation of 500 KWH per year per panel, OR another value; which would require further substantiation from the project applicant. **DOCUMENTATION:** Applicant shall submit documentation that the photovoltaic panel system is included on building plans and provide calculations that the system will offset 28% of annual electrical demand of the facilities. **TIMING:** Prior to approval of any building plan or issuance of any building permit, the photovoltaic panel system must be included on such plans and calculations provided. **MONITORING:** The [PDS, PLAN CHECKER] shall ensure that the project applicant complies with this condition by verifying that the photovoltaic panel system complies with this condition.

- B-26 The County appreciates the review and comments from the Sierra Club in its letter dated September 23, 2018. This is a summary comment opposing the “unlimited” use of the offsite carbon credits to mitigate project GHG emissions, and the use of the 30-year project lifecycle. The commenter also disagrees that the project would fully mitigate its foreseeable GHG emissions.

The County disagrees with the statement that it is allegedly allowing “unlimited” use of offsite carbon credits. The project is required to reduce GHG emissions to fullest extent possible through onsite measures and design features. Then the County would allow for the purchase offsite credits pursuant to the geographical priorities stated in the revised sixth and seventh performance standards of the GCCE mitigation measures GHG-1 and GHG-2, respectively.

Please also see the responses to comments B-17 through B-19.

**Response to comments received from Skyline Church, Daniel Grant**

- C-1 The County acknowledges and appreciates the comments from the Skyline Church in its letter dated September 7, 2018 and received via e-mail on September 24, 2018.

- The County acknowledges the receipt of the letter from the Chair of the Valle de Oro Community Planning Group dated December 12, 2017. The County also has received minutes of the September 4, 2018 meeting of the VDOCPG. The County recognizes that the Skyline Church and the VDOCPG have different perspectives on the history of the 1996 church project. No changes were made to CEQA documentation as a result of this comment.
- C-2 The County acknowledges and appreciates the comments from the Skyline Church in its letter dated September 7, 2018. The County is aware of the June 4, 1996 letter by the Skyline Church. The County recognizes that the Skyline Church and the VDOCPG have different perspectives on the history of the 1996 church project. No changes were made to CEQA documentation as a result of this comment.
- C-3 The County acknowledges and appreciates the comments from the Skyline Church in its letter dated September 7, 2018. The County is aware of the April 7, 1996 letter from the Chair of the Valle de Oro Community Planning Group. No changes were made to CEQA documentation as a result of this comment.
- C-4 The County acknowledges and appreciates the comments from the Skyline Church in its letter dated September 7, 2018. The County is aware of the June 21, 1996 staff report. The report states that the Via Mercado parcel was not required to be included in mitigation for the church project. Please see responses A-2 and A-4. The County recognizes that the Skyline Church and the VDOCPG have different perspectives on the history of the 1996 church project. No changes were made to CEQA documentation as a result of this comment.
- C-5 The County acknowledges and appreciates the comments from the Skyline Church in its letter dated September 7, 2018. The County is aware of the Additional Information Statement, dated May 23, 1996, referred to in the comment. This Additional Information Statement supplemented the Draft Subsequent Environmental Impact Report dated February 14, 1996. The Additional Information Statement was incorporated into the Final Subsequent Environmental Impact Report. It states that the Via Mercado parcel was not required to be included in mitigation for the church project. Please see responses A-2 and A-4. The County recognizes that the Skyline Church and the VDOCPG have different perspectives on the history of the 1996 church project. No changes were made to CEQA documentation as a result of this comment.
- C-6 The County acknowledges and appreciates the comments from the Skyline Church in its letter dated September 7, 2018. Please see responses A-2 and A-4. The County recognizes that the Skyline Church and the VDOCPG have different perspectives on the history of the 1996 church project. No changes were made to CEQA documentation as a result of this comment.

- C-7 The County acknowledges and appreciates the comments from the Skyline Church in its letter dated September 7, 2018. The commenter refers to the same letter, dated June 4, 1996, that is referenced in comment A-6. The County has reviewed the 1996 approvals of the church project. The current 8.9-acre Project site proposed for the retirement center was not included in any prior mitigation for the approved and constructed church development. Please see responses A-2 and A-4.

Regarding mitigation for the current Project, after review of the mitigation requirements of those 1996 approvals, the East Mitigation Parcel will no longer be included in the Project's proposal for mitigation and the mitigation that parcel was providing will be fulfilled at an alternative offsite mitigation parcel. The Biological Letter Report, the Initial Study Section IV, Biological Resources, the Mitigated Negative Declaration, and the Ordinance Compliance Checklist have been revised accordingly.

#### **Response to comments received from John Bathke**

- D-1 The County appreciates the review and comments from Mr. John Bathke in his letter dated September 24, 2018. The County acknowledges Mr. Bathke's opposition to the Project and appreciates the opportunity to address the following comments. No changes were made to CEQA documentation as a result of this comment.
- D-2 The County appreciates the review and comments from Mr. John Bathke in his letter dated September 24, 2018. The County acknowledges Mr. Bathke's concern regarding the loss of open space and direct and indirect biological impacts of the Project. The County notes that the address given in Mr. Bathke's comment is a residence that does not abut the Project site but, rather, faces land already preserved with an existing open space easement north of the existing church. The proposed Project site does not include that land. Regarding other biological impacts, please see responses to comment A-2. Initial Study Section IV. Biological Resources, also analyzes the Project's direct and indirect biological resource impacts and identifies mitigation for the Project through habitat-based mitigation and biological open space easements. Standard avoidance measures, such as temporary fencing, biological monitoring, and avoiding grading during the avian breeding season, will also reduce the project's impacts to below a level of significance. No changes were made to CEQA documentation as a result of this comment.
- D-3 The County appreciates the review and comments from Mr. John Bathke in his letter dated September 24, 2018. The County acknowledges Mr. Bathke's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2 and A-4.

- D-4 The County appreciates the review and comments from Mr. John Bathke in his letter dated September 24, 2018. The County acknowledges Mr. Bathke's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2 and A-4.
- D-5 The County appreciates the review and comments from Mr. John Bathke in his letter dated September 24, 2018. The County acknowledges this resident's opposition to the Project. The County is unaware of any additional proposals for the Project site. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from California Native Plant Society, Frank Landis**

- E-1 The County appreciates the review and comments from the San Diego Chapter of the California Native Plant Society (CNPSSD) in their letter dated September 24, 2018. This comment provides an overview of the CNPSSD's work and focus. No changes were made to CEQA documentation as a result of this comment.
- E-2 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's concerns regarding the use of a MND. Please see response to comment A-1. No changes were made to CEQA documentation as a result of this comment.
- E-3 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's concerns regarding the use of an MND for a General Plan Amendment. An MND is appropriate for this project even though it requires a General Plan Amendment because all significant impacts from the project can be mitigated to a less than significant level, and there is no substantial evidence that the project may have a significant effect on the environment. Consistent with CEQA and County processes, the County has prepared a draft Mitigated Negative Declaration for the Project. Please see response to comment A-1. The Project is not tiering off the existing General Plan Programmatic EIR. No changes were made to CEQA documentation as a result of this comment.
- E-4 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's concern regarding the Project's proposed mitigation. Initial Study Section IV. Biological Resources, analyzes the Project's direct and indirect biological resource impacts and identifies mitigation for the Project through habitat-based mitigation and biological open space easements. Standard avoidance measures, such as temporary fencing, biological monitoring, and avoiding grading during the avian breeding season, will also reduce the project's impacts to below a level of significance. Please also see response to comments A-19, A-20 B-7, B-8 and B-9

above, which pertain to the adequacy of the Project's proposed mitigation. No changes were made to CEQA documentation as a result of this comment.

- E-5 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's question regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- E-6 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's concern regarding Palmer's goldenbush. The Palmer's goldenbush within the Not a Part (NAP) area is afforded "protection" only in the sense that it may not be removed during this Project. These NAP individuals do not constitute mitigation for impacts to the Palmer's goldenbush species. Mitigation for Palmer's goldenbush is provided offsite at a location that is contiguous with undevelopable State Land that connects to a National Wildlife Refuge, as shown in Figure 4 of the Project's Resource Management Plan. Regarding San Diego sunflower, please see the response to comment B-7. No changes were made to CEQA documentation as a result of this comment.
- E-7 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's concern regarding the offsite biological open space easements. The combination of the easement and the required in-perpetuity management mitigates for physical loss of plants. The Project's required Resource Management Plan provides more than just protection, it provides in-perpetuity management for the benefit of the covered native plants and animals. Removal of invasive species from the preserved land, as required under the Resource Management Plan, may be the single most effective way to promote growth and spread of native plants growing there, including Palmer's goldenbush. Invasives removal will increase availability of water, ground space, and nutrients for the native species, and remove non-native biomass that can physically block growth of native species. Careful land management within the biological conservation easement allows natural regeneration and spread of plants suited to the location, and is expected to lead to spread of new Palmer's goldenbush from the existing population. No changes were made to CEQA documentation as a result of this comment.
- E-8 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD'S concerns regarding the climate change analysis. Initial Study Section VII. Greenhouse Gas Emissions, identifies that the Project prepared a greenhouse gas analysis report titled "Global Climate Change Evaluation for Skyline Retirement Center". The analysis provided within the Initial Study and the greenhouse gas analysis report is Project specific. Some sentences were revised in Section 2.1 of the report for



accuracy. Please see response to comment B-10. No changes were made to CEQA documentation as a result of this comment.

- E-9 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD'S concerns regarding the County Climate Action Plan. Please see response to comment B-12.
- E-10 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's concerns regarding the use of a MND. Please see response to comment A-1. Per State CEQA Guidelines Section 15070, the County believes the analysis for the Project demonstrates that it will not have a significant effect on the environment. In addition, pursuant to Section 15073.5, the County does not believe the minor revisions made the MND as result of responding to comments requires recirculation of the MND. Therefore, an EIR is not required and no changes were made to CEQA documentation as a result of this comment.
- E-11 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's concerns regarding the analysis of land use, rare plans and greenhouse gas reductions. Please see response to comment A-1 and E-10. Per State CEQA Guidelines Section 15073.5(c) the CEQA documentation does not require recirculation. No changes were made to CEQA documentation as a result of this comment.
- E-12 The County appreciates the review and comments from the CNPSSD in their letter dated September 24, 2018. The County acknowledges CNPSSD's request to receive any future information on the project. No changes were made to CEQA documentation as a result of this comment.

#### **Response to comments received from Josan Feathers**

- F-1 The County appreciates the review and comments from Ms. Josan Feathers in the letter dated September 24, 2018. The County acknowledges Ms. Feather's concern regarding existing open space easements in relation to past Project approvals. Please see response to comment A-2 and A-4.
- F-2 The County appreciates the review and comments from Josan Feathers in her letter dated September 24, 2018. Please see response to comments A-2, A-3, and A-4.
- F-3 The County appreciates the review and comments from Ms. Josan Feathers in her letter dated September 24, 2018. The County acknowledges Ms. Feather's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

- F-4 The County appreciates the review and comments from Ms. Josan Feathers in her letter dated September 24, 2018. The County acknowledges Ms. Feather's concern regarding an April 7<sup>th</sup>, 1996 letter from the VDOCPG. Please see response to comment A-3.
- F-5 The County appreciates the review and comments from Ms. Josan Feathers in her letter dated September 24, 2018. The County acknowledges Ms. Feather's concern regarding a May 23<sup>rd</sup>, 1996 AIS. Please see response to comment A-4.
- F-6 The County appreciates the review and comments from Ms. Josan Feathers in her letter dated September 24, 2018. The County acknowledges Ms. Feather's concern regarding a June 4<sup>th</sup> 1996 letter from Skyline Church. Please see response to comment A-6.
- F-7 The County appreciates the review and comments from Ms. Josan Feathers in her letter dated September 24, 2018. The County acknowledges Ms. Feather's concerns regarding the Project Applicant. No changes were made to CEQA documentation as a result of this comment.
- F-8 The County appreciates the review and comments from Ms. Josan Feathers in her letter dated September 24, 2018. The County acknowledges Ms. Feather's concerns regarding a 2015 Administrative Permit. Based on the comment, the application was withdrawn when the proposed fuel management was deemed unnecessary, so speculation on possible other motives is moot. This comment does not pertain to the environmental analysis within the MND. No changes were made to CEQA documentation as a result of this comment.
- F-9 The County appreciates the review and comments from Ms. Josan Feathers in her letter dated September 24, 2018. The County acknowledges Ms. Feather's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Dan Silver, Endangered Habitats League**

- G-1 The County appreciates the review and comments from the Endangered Habitats League (EHL) in their letter dated August 13, 2018. The County acknowledges EHL's position that the project is a good example of the MSCP streamlined permitting process. No changes were made to CEQA documentation as a result of this comment.
- G-2 The County appreciates the review and comments from the EHL in their letter dated August 13, 2018. The County acknowledges EHL's concern regarding wildlife agency concurrence with the proposed mitigation. The County has

coordinated with the wildlife agencies regarding the Project's proposed mitigation and will continue to do so as appropriate. Comment H-1 from the California Department of Fish and Wildlife refers to several meetings about the Project. County staff last discussed the proposed mitigation with staff from both the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service on June 21, 2018. Follow up communication led to both agencies concurring with the proposed mitigation. Biological mitigation measures have been revised as explained in the response to comment A-2. The County will coordinate with the wildlife agencies on this revision and ensure their concurrence prior to Project approval. As stated in the draft Multiple Species Conservation Program (MSCP) Findings, the Project requires wildlife agency concurrence to place a Minor Amendment area into a biological open space easement as part of mitigation for proposed project impacts in order to achieve conformance with the MSCP. No changes were made to CEQA documentation as a result of this comment.

- G-3 The County appreciates the review and comments from the EHL in their letter dated August 13, 2018. The County acknowledges EHL's concern regarding the Project's proposed mitigation. Please see response to comment A-2, E-4 and E-7.
- G-4 The County appreciates the review and comments from the EHL in their letter dated August 13, 2018. The County acknowledges EHL's concern regarding wildlife agency input. Please see response to comment G-2 and H-1.
- G-5 The County appreciates the review and comments from the EHL in their letter dated August 13, 2018. The County acknowledges EHL's concern regarding offsite carbon offsets. The fifth performance standard in proposed mitigation measures GHG-1 and GHG-2 requires the purchased carbon offsets to "achieve real, permanent, quantifiable, verifiable, and enforceable reductions in accordance with California Health and Safety Code, Section 38562(d)(1))." Please see response to comment B-12 and B-18. In addition, a condition has been added to the Mitigated Negative Declaration for clarity and to ensure the project implements a solar system that is consistent with the description of the system that was provided in Attachment B of the Global Climate Change Evaluation Report. No changes were made to CEQA documentation as a result of this comment.
- G-6 The County appreciates the EHL's interest in reviewing their stated concerns with the County. Please see responses to comments G-1 through G-5.

**Response to comments received from Christine Beck, California Department of Fish and Wildlife**

- H-1 The County appreciates the review and comments from Christine Beck of the California Department of Fish and Wildlife in her email dated September 24, 2018.

This comment confirms Project consultation between the County and USFWS. No changes were made to CEQA documentation as a result of this comment.

- H-2 The County acknowledges and appreciates this comment regarding the salvage and translocation of Coast Cholla and barrel cactus. Attachment C (Guidelines for Cactus Salvage) of the County's Report Format and Content Requirements for Biological Resources includes requirements for salvage of Coast Cholla. Based on those requirements, the project will include a mitigation measure to prepare a Coast Cholla mitigation plan or to coordinate with the U.S. Fish and Wildlife Service to relocate cactus for restoration on other sites, as detailed in a condition in the Mitigated Negative Declaration (MND). In addition, the Guidelines for Cactus Salvage include recommendations rather than requirements that other cactus species including barrel cactus be salvaged. No barrel cactus was observed on the Project site. However, in response to this comment, the Initial Study was revised and the condition in the MND has been revised to encourage that if any barrel cactus is found, it should be salvaged concurrently with the Coast Cholla. In addition, the review of the Coast Cholla conditions generated by this comment identified clarifications needed for a mitigation plan and secured agreement created specifically for cactus. Those clarifications have been made.

#### **Response to comments received from Cindy Pino, Sweetwater Authority**

- I-1 The County appreciates the review and comments from Cindy Pino of the Sweetwater Authority in her letter dated August 30, 2018. The County acknowledges receipt of the 06/02/2016 Sweetwater Authority letter and has included compliance with Sweetwater Authority Resolution 84-8, as a condition of Project approval. No changes were made to CEQA documentation as a result of this comment.

#### **Response to comments received from Bill Tippetts**

- J-1 The County appreciates the review and comments from Bill Tippetts in his email dated August 13, 2018. The County acknowledges Mr. Tippetts' concern regarding the biological status of the Project site. Neither the project site's land use designation (Open Space) nor zoning (Transportation & Utility Corridor) determines whether it has "elevated" biological status under the Multiple Species Conservation Program (MSCP). The MND fully analyzed the potential biological impacts from the project and concluded that any potential significant impacts would be adequately mitigated. No changes were made to CEQA documentation as a result of this comment.
- J-2 The County appreciates the review and comments from Bill Tippetts in his email dated August 13, 2018. The County acknowledges Mr. Tippetts' concern regarding

the MSCP status of the Project site. To clarify, biological impacts on the project site require 9.3 acres of mitigation. The mitigation is proposed offsite, not on the project site. The original proposal specified two offsite mitigation parcels, one of which is in a PAMA area. However, as explained in the response to comment A-2, that parcel will no longer be proposed for mitigation for this project and the mitigation it would have provided will occur elsewhere. Mitigation sites will have biological easements placed over them and a Resource Management Plan (RMP) will be required. The RMP will include measures for controlling invasive species and other means of protecting the mitigation site. No changes were made to CEQA documentation as a result of this comment.

- J-3 The County appreciates the review and comments from Bill Tippetts in his email dated August 13, 2018. The County acknowledges Mr. Tippetts' concern regarding offsite carbon offsets. Please see response to comment B-17 and B-18.

**Response to comments received from Valle de Oro Community Planning Group  
Speaker Slip/Written Input**

- K-1 The County appreciates written input from Susan Nichols during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- K-2 The County appreciates written input from David Zimmerman during the Project's public meeting on 9/04/18. The County acknowledges this resident's opposition to the location for this Project, due to neighborhood character and biological diversity. Please refer to comment A-13, A-14, A-15 for additional information related to community character. Please refer to comment A-18 and A-19 for additional information related to biological diversity. The MND fully analyzed the potential biological impacts from the project and concluded that any potential significant impacts would be adequately mitigated. No changes were made to CEQA documentation as a result of this comment.
- K-3 The County appreciates written input from Duane Norman during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project based on issues related to open space preservation. Please refer to response A-2.
- K-4 The County appreciates written input from Carol Peluso-Briggs during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project due to traffic and open space. Please see response to comment A-2. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, impacts would be

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less than significant with mitigation incorporated. No changes were made to CEQA documentation as a result of this comment.

- K-5 The County appreciates written input from Julia Borysensieca during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- K-6 The County appreciates written input from Paul Falk during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- K-7 The County appreciates written input from Nickolas Green during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project due to traffic flow and construction. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, impacts would be less than significant with mitigation incorporated. No changes were made to CEQA documentation as a result of this comment.
- K-8 The County appreciates written input from Dennis Donley during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- K-9 The County appreciates written input from Donna Byron during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project due to traffic, noise and aesthetics. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, transportation impacts would be less than significant with mitigation incorporated. Initial Study Section XII. Noise provides an analysis of the Project's impacts related to noise. As discussed in this section, noise impacts would be less than significant with mitigation incorporated. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. No changes were made to CEQA documentation as a result of this comment.
- K-10 The County appreciates written input from Alex Concho during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project. No changes were made to CEQA documentation as a result of this comment.

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- K-11 The County appreciates written input from John Bathke during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- K-12 The County appreciates written input from Carole Sanford during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project due to traffic issues, aesthetic issues and open space issues. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, transportation impacts would be less than significant with mitigation incorporated. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. Please refer to response A-2 regarding open space.
- K-13 The County appreciates written input from Mary Sannwald during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project due to the open space designation. Please see response to comment A-2.
- K-14 The County appreciates written input from Ralf Bauer during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- K-15 The County acknowledges this residents request to be included in Project emails. No changes were made to CEQA documentation as a result of this comment.
- K-16 The County appreciates written input from Gary Westergren during the Project's public meeting on 9/04/18. The County acknowledges this residents opposition to the Project due to open space issues and this residents request to be included in Project emails. Please see response to comment A-2. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Bill Hoffman**

- L-1 The County appreciates the review and comments from Mr. Bill Hoffman in his email dated September 21, 2018. The County acknowledges Mr. Hoffman's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- L-2 The County appreciates the review and comments from Mr. Bill Hoffman in his email dated September 21, 2018. The County acknowledges Mr. Hoffman's

concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

- L-3 The County appreciates the review and comments from Mr. Bill Hoffman in his email dated September 21, 2018. The County acknowledges Mr. Hoffman's suggestion to build mixed use residences off-site, at an alternative location. Construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Allison Henderson**

- M-1 The County appreciates the review and comments from Ms. Allison Henderson in her email dated September 21, 2018. This comment does not pertain to the environmental analysis. No changes were made to CEQA documentation as a result of this comment.
- M-2 The County appreciates the review and comments from Ms. Allison Henderson in her email dated September 21, 2018. The County acknowledges Ms. Henderson's concern regarding General Plan Amendments. Although amendments to the General Plan are allowed, Government Code Section 65358 limits the number of times any General Plan mandatory element can be amended to four times per year. No changes were made to CEQA documentation as a result of this comment.
- M-3 The County appreciates the review and comments from Ms. Allison Henderson in her email dated September 21, 2018. The County acknowledges Ms. Henderson's concern regarding the development of the Project site. Please refer to comment A-2. Initial Study Section X., Land Use and Planning also provides an analysis of the Project's conflicts with applicable land use plans. As stated in this section, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No changes were made to CEQA documentation as a result of this comment.
- M-4 The County appreciates the review and comments from Ms. Allison Henderson in her email dated September 21, 2018. The County acknowledges Ms. Henderson's concern regarding the development of East County, when compared to the Rancho Santa Fe area. This comment does not pertain to the environmental analysis. No changes were made to CEQA documentation as a result of this comment.
- M-5 The County appreciates the review and comments from Allison Henderson in her email dated September 21, 2018. The County acknowledges Ms. Henderson's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.



**Response to comments received from James Merzbacher**

- N-1 The County appreciates the review and comments from Mr. Jim Merzbacher in his email dated September 05, 2018. The County acknowledges Mr. Merzbacher's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- N-2 The County appreciates the review and comments from Mr. Jim Merzbacher in his email dated September 05, 2018. The County acknowledges Mr. Merzbacher's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Lynn Mitchell**

- O-1 The County appreciates the review and comments from Ms. Lynn Mitchell in her email dated August 20, 2018. The County acknowledges Ms. Mitchell's concern regarding open space and noise. Please see response to comment A-2. Initial Study Section XII. Noise also provides an analysis of the Project's impacts related to noise. As discussed in this section, noise impacts would be less than significant with mitigation incorporated. Initial Study Section IV. Biological Resources, also analyzes the Project's direct and indirect biological resource impacts and identifies mitigation for the Project through habitat-based mitigation and biological open space easements. As discussed in this section, biological resource impacts would be less than significant with mitigation incorporated.
- O-2 The County appreciates the review and comments from Ms. Lynn Mitchell in her email dated August 20, 2018. The County acknowledges Ms. Mitchell's concerns regarding traffic. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, transportation and traffic impacts would be less than significant with mitigation incorporated. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.
- O-3 The County appreciates the review and comments from Ms. Lynn Mitchell in her email dated August 20, 2018. The County acknowledges Ms. Mitchell's opposition to the Project. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Susan Nichols**

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- P-1 The County appreciates the review and comments from Susan Nichols, Grossmont-Mt. Helix Improvement Association (GMIA) President, in her email dated September 24, 2018. This comment provides an overview of the GMIA. No changes were made to CEQA documentation as a result of this comment.
- P-2 The County appreciates the review and comments from Susan Nichols, GMIA President, in her email dated September 24, 2018. The County acknowledges the GMIA's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.
- P-3 The County appreciates the review and comments from Susan Nichols, GMIA President, in her email dated September 24, 2018. The County acknowledges the GMIA's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- P-4 The County appreciates the review and comments from Susan Nichols, GMIA President, in her email dated September 24, 2018. The County acknowledges the GMIA's opposition to a past proposal on the Project site and request for selection of an alternative location. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.
- P-5 The County appreciates the review and comments from Susan Nichols, GMIA President, in her email dated September 24, 2018. The County acknowledges the GMIA's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Ralph W. Boldrick**

- Q-1 The County appreciates the review and comments from Ralph W. Boldrick in his email dated September 21, 2018. The County acknowledges Mr. Wilke's support for the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Stephen Bickley**

- R-1 The County appreciates the review and comments from Mr. Stephen Bickley in his email dated September 24, 2018. The County acknowledges Mr. Bickley's concerns regarding aesthetics of the Project. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. No changes were made to CEQA documentation as a result of this comment.

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- R-2 The County appreciates the review and comments from Mr. Stephen Bickley in his email dated September 21, 2018. The County acknowledges Mr. Bickley's concerns regarding a 1996 letter from Skyline Church and open space easements in relation to past Project approvals. Please see response to comment A-2 and A-6. No changes were made to CEQA documentation as a result of this comment.
- R-3 The County appreciates the review and comments from Mr. Stephen Bickley in his email dated September 21, 2018. The County acknowledges Mr. Bickley's concerns regarding the VDOCPG's 1996 position. Please see response to comment A-2 and A-3. No changes were made to CEQA documentation as a result of this comment.
- R-4 The County appreciates the review and comments from Mr. Stephen Bickley in his email dated September 21, 2018. The County acknowledges Mr. Bickley's concerns regarding biological resources and traffic. Initial Study Section IV. Biological Resources, analyzes the Project's direct and indirect biological resource impacts and identifies mitigation for the Project through habitat-based mitigation and biological open space easements. Standard avoidance measures, such as temporary fencing, biological monitoring, and avoiding grading during the avian breeding season, will also reduce the project's impacts to below a level of significance. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, impacts would be less than significant with mitigation incorporated. No changes were made to CEQA documentation as a result of this comment.
- R-5 The County appreciates the review and comments from Mr. Stephen Bickley in his email dated September 21, 2018. The County acknowledges Mr. Bickley's opposition to the Project and reference to two unrelated County Projects. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Lisa Foland**

- S-1 The County appreciates the review and comments from Lisa Foland in her email dated September 05, 2018. The County acknowledges the Ms. Foland's opposition to the existing church and proposed Project due to aesthetics. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. No changes were made to CEQA documentation as a result of this comment.
- S-2 The County appreciates the review and comments from Lisa Foland in her email dated September 05, 2018. The County acknowledges Ms. Foland's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

- S-3 The County appreciates the review and comments from Lisa Foland in her email dated September 05, 2018. The County acknowledges Ms. Foland's concern regarding the Project Applicant nonprofit status. This comment does not pertain to the environmental analysis. No changes were made to CEQA documentation as a result of this comment.
- S-4 The County appreciates the review and comments from Lisa Foland in her email dated September 05, 2018. The County acknowledges Ms. Foland's opposition to the Project and concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Dennis Donley**

- T-1 The County appreciates the review and comments from Dennis Donley in his email dated August 20, 2018. At the request of the commenter, this comment has been withdrawn. The topic is addressed in responses to comments A-2 and A-4.

**Response to comments received from Alicia Massery**

- U-1 The County appreciates the review and comments from Ms. Alicia Massery in her email dated September 05, 2018. The County acknowledges Ms. Massery's concerns regarding the analysis of environmental impacts related to the Project. Please see response to comment A-1. No changes were made to CEQA documentation as a result of this comment.
- U-2 The County appreciates the review and comments from Ms. Alicia Massery in her email dated September 05, 2018. The County acknowledges Ms. Massery's concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- U-3 The County appreciates the review and comments from Ms. Alicia Massery in her email dated September 05, 2018. The County acknowledges Ms. Massery's concern regarding the Project Applicant nonprofit status. This comment does not pertain to the environmental analysis. No changes were made to CEQA documentation as a result of this comment.
- U-4 The County appreciates the review and comments from Ms. Alicia Massery in her email dated September 05, 2018. The County acknowledges Ms. Massery's concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from James Marshall**

- V-1 The County appreciates the review and comments from Mr. James Marshall in his email dated September 20, 2018. The County acknowledges Mr. Marshall's concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Jane LiVigni**

- W-1 The County appreciates the review and comments from Ms. Jane LiVigni in her email dated September 05, 2018. The County acknowledges Ms. LiVigni's concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- W-2 The County appreciates the review and comments from Jane LiVigni in her email dated September 05, 2018. The County acknowledges Ms. LiVigni's concerns regarding past project approvals and mitigation requirements and opposition to the Project. Please see response to comment A-2. All public comments have been included as part of the public record and considered during review of the Project by the County. The Project site is not currently being plowed or prepared for development, as the Project has not yet been approved.

**Response to comments received from Maria Morgan**

- X-1 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- X-2 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The Project would not cut through the Avocado Village area. No changes were made to CEQA documentation as a result of this comment.
- X-3 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's request to locate the Project to an alternative site. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.
- X-4 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

- X-5 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's concerns regarding operation of the retirement facility. Initial Study Section 8, Description of Project, provides details on the proposed facility. Total units for the Project would be 232, divided between 85 independent living units and 147 assisted living units. Total estimated workers onsite at any time is not expected to exceed 30. No changes were made to CEQA documentation as a result of this comment.
- X-6 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's request to locate the Project to an alternative site. Please see response to comment -K-2.
- X-7 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's concern regarding Project access. Initial Study Section 8., Description of Project, provides details on facility access. Access to the Skyline Retirement Center would be provided from an existing private driveway off Campo Road (SR94), which connects to the adjacent Skyline Wesleyan Church's parking lots. The Project would not provide access through any existing neighborhood, Cuyamaca College or Avocado Village. Existing access to the existing church site will remain unchanged and will not be expanded as part of the Project. No changes were made to CEQA documentation as a result of this comment.
- X-8 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's concern regarding Project traffic. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, impacts would be less than significant with mitigation incorporated. Please see the response to comment X-7. No changes were made to CEQA documentation as a result of this comment.
- X-9 The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County appreciates the review and comments from Ms. Maria Morgan in her email dated September 05, 2018. The County acknowledges Ms. Morgan's request to locate the Project to an alternative site. Please see response to comment K-2.

**Response to comments received from Aaron**

- Y-1 The comment summarizes a phone conversation regarding the Project between Avocado Village Community resident, Aaron, and County of San Diego Staff, Jeff

Smyser, on August 16, 2018. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Terri Steele**

- Z-1 The County appreciates the review and comments from Ms. Terri Steele in her email dated September 24 and September 21, 2018. The County acknowledges Ms. Steele's concerns regarding the Project and her support for the recommendations of the VDOCPG and GMIA. Please refer to Letter A for responses to VDOCPG comments and Letter P for responses to GMIA comments. All comments submitted during the Project's public review have become part of the public record. No changes were made to CEQA documentation as a result of this comment.
- Z-2 The County appreciates the review and comments from Ms. Terri Steele in her email dated September 21, 2018. The County acknowledges Ms. Steele's concern regarding open space in relation to past Project approvals. The Church purchased the property, which was not owned by the County. Please see response to comment A-2.
- Z-3 The County appreciates the review and comments from Ms. Terri Steele in her email dated September 21, 2018. The County acknowledges Ms. Steele's concerns regarding aesthetics. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. No changes were made to CEQA documentation as a result of this comment.
- Z-4 The County appreciates the review and comments from Ms. Terri Steele in her email dated September 21, 2018. The County acknowledges Ms. Steele's concerns regarding traffic, dust and noise. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, traffic and transportation impacts would be less than significant with mitigation incorporated. Initial Study Section III. Air Quality provides an analysis of the Project's impacts related to air quality and dust. As discussed in this section, air quality impacts would be less than significant. Additionally, Initial Study Section XII. Noise provides an analysis of the Project's impacts related to noise. As discussed in this section, noise impacts would be less than significant with mitigation incorporated. No changes were made to CEQA documentation as a result of this comment.
- Z-5 The County appreciates the review and comments from Ms. Terri Steele in her email dated September 21, 2018. The County acknowledges Ms. Steele's opposition to the Project and concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2. Please refer to

Letter A for responses to VDOCPG comments and Letter P for responses to GMIA comments. All comments submitted during the Project's public review have become part of the public record. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Marianne McNabb and Leland Blanchard**

- AA-1 The County appreciates the review and comments from Ms. Marianne McNabb and Mr. Leland Blanchard in their letter dated September 6, 2018. The County acknowledges Ms. McNabb and Mr. Blanchard's concerns regarding existing traffic and aesthetics. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic, including existing traffic conditions. As discussed in this section, impacts would be less than significant with mitigation incorporated. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources, including an analysis of existing conditions. As discussed in this section, aesthetic impacts would be less than significant. No changes were made to CEQA documentation as a result of this comment.
- AA-2 The County appreciates the review and comments from Ms. Marianne McNabb and Mr. Leland Blanchard in their letter dated September 6, 2018. The County acknowledges Ms. McNabb and Mr. Blanchard's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- AA-3 The County appreciates the review and comments from Ms. Marianne McNabb and Mr. Leland Blanchard in their letter dated September 6, 2018. Please see response to comment A-2.
- AA-4 The County appreciates the review and comments from Ms. Marianne McNabb and Mr. Leland Blanchard in their letter dated September 6, 2018. The County acknowledges Ms. McNabb and Mr. Blanchard's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- AA-5 The County appreciates the review and comments from Ms. Marianne McNabb and Mr. Leland Blanchard in their letter dated September 6, 2018. The County acknowledges Ms. McNabb and Mr. Blanchard's concern regarding the Project Applicant nonprofit status. This comment does not pertain to the environmental analysis. No changes were made to CEQA documentation as a result of this comment.
- AA-6 The County appreciates the review and comments from Ms. Marianne McNabb and Mr. Leland Blanchard in their letter dated September 6, 2018. The County



acknowledges Ms. McNabb and Mr. Blanchard's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

AA-7 The County appreciates the review and comments from Ms. Marianne McNabb and Mr. Leland Blanchard in their letter dated September 6, 2018. The County acknowledges Ms. McNabb and Mr. Blanchard's opposition to the Project and concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Eric Rumsey**

BB-1 The County appreciates the review and comments from Mr. Eric Rumsey in his email dated September 07, 2018. The County acknowledges Mr. Rumsey's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Gary Westergren**

CC-1 The County appreciates the review and comments from Mr. Gary Westergren in his email dated September 5, 2018. Please see response to comment A-2.

CC-2 The County appreciates the review and comments from Mr. Gary Westergren in his email dated September 5, 2018. The County acknowledges Mr. Westergren's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

CC-3 The County appreciates the review and comments from Mr. Gary Westergren in his email dated September 5, 2018. The County acknowledges Mr. Westergren's concern regarding the Project Applicant nonprofit status. This comment does not pertain to the environmental analysis. No changes were made to CEQA documentation as a result of this comment.

CC-4 The County appreciates the review and comments from Mr. Gary Westergren in his email dated September 5, 2018. The County acknowledges Mr. Westergren's concern regarding existing open space easements in relation to past Project approvals. Please see response to comment A-2.

CC-5 The County appreciates the review and comments from Mr. Gary Westergren in his email dated September 5, 2018. The County acknowledges Mr. Westergren's concern regarding a past proposal regarding Walmart. The County has no knowledge of alternative development plans, if the Project is not approved. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Gerald Wilke**

- DD-1 The County appreciates the review and comments from Mr. Gerald Wilke in his email dated September 05, 2018, and revised September 06, 2018. Please see response to comment A-2.
- DD-2 The County appreciates the review and comments from Mr. Gerald Wilke in his email dated September 05, 2018, and revised September 06, 2018. The County acknowledges Mr. Wilke's opposition to the Project's proposed mitigation due to concern regarding past project mitigation requirements. Please refer to comment A-2.
- DD-3 The County appreciates the review and comments from Mr. Gerald Wilke in his email dated September 05, 2018, and revised September 06, 2018. The County acknowledges Mr. Wilke's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Holly Yarris**

- EE-1 The County appreciates the review and comments from Ms. Holly Yarris in her email dated September 22, 2018. The County acknowledges Ms. Yarris' concern regarding open space. Please see response to comment A-2.
- EE-2 The County appreciates the review and comments from Ms. Holly Yarris in her email dated September 22, 2018. The County acknowledges Ms. Yarris' concern regarding Project compliance with the General Plan. Initial Study Section X., Land Use and Planning, provides an analysis of the Project's conflicts with applicable land use plans. As stated in this section, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No changes were made to CEQA documentation as a result of this comment.
- EE-3 The County appreciates the review and comments from Ms. Holly Yarris in her email dated September 22, 2018. The County acknowledges Ms. Yarris' opposition to the Project. Please refer to responses to Letter A, which address each of the VDOCPG issues of concern.
- EE-4 The County appreciates the review and comments from Ms. Holly Yarris in her email dated September 22, 2018. The County acknowledges Ms. Yarris' opposition to the project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Laurinda Ream**

FF-1 The County appreciates the review and comments from Ms. Laurinda Ream in her email dated September 25, 2018. The County acknowledges Ms. Ream's support for the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Nuri Pierce**

GG-1 The County appreciates the review and comments from Ms. Nuri Pierce in her email dated September 21, 2018. The County acknowledges Ms. Pierce's opposition to the project. It should be noted that the Major Use Permit for the Project has not been denied and is currently under consideration by the County. No changes were made to CEQA documentation as a result of this comment.

GG-2 The County appreciates the review and comments from Ms. Nuri Pierce in her email dated September 21, 2018. The County acknowledges Ms. Pierce's concern regarding existing open space easements in relation to past Project approvals. Please see response to comment A-2.

GG-3 The County appreciates the review and comments from Ms. Nuri Pierce in her email dated September 21, 2018. The County acknowledges Ms. Pierce's opposition to the project and request for Project denial. No changes were made to CEQA documentation as a result of this comment.

GG-4 The County appreciates the review and comments from Ms. Nuri Pierce in her email dated September 21, 2018. The County acknowledges Ms. Pierce's request to locate the Project on an alternative site. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.

GG-5 The County appreciates the review and comments from Ms. Nuri Pierce in her email dated September 21, 2018. The County acknowledges Ms. Pierce's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Glenn Pezzoli**

HH-1 The County appreciates the review and comments from Mr. Glenn Pezzoli in his email dated September 05, 2018. The County acknowledges Mr. Pezzoli's opposition to the Project and concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Barbara Moore**

- II-1 The County appreciates the review and comments from Barbara Moore in her email dated September 22, 2018. The County acknowledges Ms. Moore's support for the project. The Otay Water District has provided documentation that it has adequate facilities and capacity to provide water and sewer service to the site. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Marie Mixon**

- JJ-1 The County appreciates the review and comments from Ms. Marie Mixon in her email dated September 21, 2018. The County acknowledges this Ms. Mixon's opposition for the project due to open space, aesthetic and rural issues. Please refer to response A-2 for information related to open space and prior project approvals. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. Initial Study Section X, Land Use and Planning provides an analysis of the Project's conflicts with applicable land use plans, such as those pertaining to the rural character of the area. As stated in this section, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

**Response to comments received from Lawrence Klein**

- KK-1 The County appreciates the review and comments from Mr. Lawrence Klein in his email dated September 21, 2018. The County acknowledges Mr. Klein's support for the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Beth Jacobson**

- LL-1 The County appreciates the review and comments from Ms. Beth Jacobson in her email dated September 06, 2018. The County acknowledges Ms. Jacobson's opposition to the Project and concern regarding existing open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from John A. and Amy F. Malone**

- MM-1 The County appreciates the review and comments from Mr. John Malone and Ms. Amy Malone in their email dated September 24, 2018. The County acknowledges the commenters' opposition to the Project due to concerns raised by GMIA. Please refer to Letter P for responses to GMIA comments on the Project.
- MM-2 The County appreciates the review and comments from Mr. John Malone and Ms. Amy Malone in their email dated September 24, 2018. The County acknowledges

the commenters' opposition to the Project due to concerns raised by VDOCPG. Please refer to Letter A for responses to VDOCPG comments.

MM-3 The County appreciates the review and comments from Mr. John Malone and Ms. Amy Malone in their email dated September 24, 2018. The County acknowledges the commenters opposition to the Project and concern regarding aesthetics and open space easements in relation to past Project approvals. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. Please see response to comment A-2 regarding open space. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Jennifer Bergovoy**

NN-1 The County appreciates the review and comments from Ms. Jennifer Bergovoy in her email dated August 15, 2018. The County acknowledges Ms. Bergovoy's opposition to the Project due to the proposed land use change. Please see response to comment A-2. Initial Study Section X, Land Use and Planning, also provides an analysis of the Project's conflicts with applicable land use plans, such as those pertaining to the rural character of the area. As stated in this section, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

NN-2 The County appreciates the review and comments from Ms. Jennifer Bergovoy in her email dated August 15, 2018. The County acknowledges Ms. Bergovoy's concern regarding global climate change and wildlife. Initial Study Section VII. Greenhouse Gas Emissions, provides a Project specific greenhouse gas analysis. The results of this analysis determined that Project impacts would be less than significant with mitigation incorporated. Initial Study Section IV. Biological Resources, identifies that mitigation for the Project's direct and indirect impacts to biological resources shall be provided through habitat-based mitigation and biological open space easements. The results of the analysis determined that biological resource Project impacts would be less than significant with mitigation incorporated. No changes were made to CEQA documentation as a result of this comment.

NN-3 The County appreciates the review and comments from Ms. Jennifer Bergovoy in her email dated August 15, 2018. The County acknowledges Ms. Bergovoy's request to locate the Project to an alternative site. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Jennifer Bergovoy**

- OO-1 The County appreciates the review and comments from Ms. Jennifer Bergovoy in her email dated September 21, 2018. The County acknowledges Ms. Bergovoy's opposition to the Project and concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.
- OO-2 The County appreciates the review and comments from Jennifer Bergovoy in her email dated September 21, 2018. The County acknowledges Ms. Bergovoy's concern regarding Project impacts to wildlife. Initial Study Section IV. Biological Resources, identifies that mitigation for the Project's direct and indirect impacts to biological resources shall be provided through habitat-based mitigation and biological open space easements. The results of the analysis determined that biological resource impacts would be less than significant with mitigation incorporated. No changes were made to CEQA documentation as a result of this comment.
- OO-3 The County appreciates the review and comments from Jennifer Bergovoy in her email dated September 21, 2018. The County acknowledges Ms. Bergovoy's request to locate the Project to an alternative site. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Kathleen Browneller-Bickley**

- PP-1 The County appreciates the review and comments from Ms. Kathleen Browneller-Bickley in her email dated September 24, 2018. The County acknowledges Ms. Browneller-Bickley's concern regarding existing open space in relation to past Project approvals. Please see response to comment A-2.
- PP-2 The County appreciates the review and comments from Ms. Kathleen Browneller-Bickley in her email dated September 24, 2018. The County acknowledges Ms. Browneller-Bickley's concerns regarding traffic in the area. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, impacts would be less than significant with mitigation incorporated. No changes were made to CEQA documentation as a result of this comment.
- PP-3 The County appreciates the review and comments from Ms. Kathleen Browneller-Bickley in her email dated September 24, 2018. The County acknowledges Ms. Browneller-Bickley's concerns regarding open space easements in relation to past Project approvals. Please see response to comment A-2 and A-6.

**Response to comments received from Dana Bair**

QQ-1 The County appreciates the review and comments from Mr. Dana Blair in his email dated August 24, 2018. The County acknowledges Mr. Blair's support for the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Dawn Allard**

RR-1 The County appreciates the review and comments from Ms. Dawn Allard in her email dated September 07, 2018. The County acknowledges Ms. Allard's opposition to the Project and concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Mary Eileen Birchmore**

SS-1 The County appreciates the review and comments from Ms. Mary Eileen Birchmore in her email dated September 21, 2018. The County acknowledges Ms. Birchmore's concerns regarding open space. Please see response to comment A-2. It should also be noted the Initial Study Section IV. Biological Resources provides an analysis of direct and indirect biological resources impacts for the Project. As stated in this section, the Project would result in less than significant impacts through habitat-based mitigation and open space easements. Initial Study Section X, Land Use and Planning also provides an analysis of the Project's conflicts with applicable land use plans. As stated in this section, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Tom Dillon**

TT-1 The County appreciates the review and comments from Mr. Tom Dillon in his email dated September 21, 2018. The County acknowledges Mr. Dillon's opposition to the Project and concern regarding open space . Please see response to comment A-2.

**Response to comments received from Olivia and Clive Dorman**

UU-1 The County appreciates the review and comments from Ms. Olivia Dorman and Mr. Clive Dorman in their email dated September 21, 2018. The County acknowledges the Dorman's opposition to the Project and concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Connie Lind**

VV-1 The County appreciates the review and comments from Ms. Connie Lind in her email dated September 23, 2018. The County acknowledges Ms. Lind's support for the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Sharon Hogg**

WW-1 The County appreciates the review and comments from Ms. Sharon Hogg in her email dated September 24, 2018. The County acknowledges Ms. Hogg's opposition to the Project and concern regarding open space. Please see response to comment A-2. Initial Study Section X, Land Use and Planning also provides an analysis of the Project's conflicts with applicable land use plans. As stated in this section, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

WW-2 The County appreciates the review and comments from Ms. Sharon Hogg in her letter dated September 24, 2018. The County acknowledges Ms. Hogg's request to locate the Project on an alternative site. Regarding construction of the Project at an alternative location, please see the response to comment K-2. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Martin and Deanna Greenberg**

XX-1 The County appreciates the review and comments from Mr. Martin Greenberg and Ms. Deena Greenberg in their email dated September 21, 2018. The County acknowledges the Greenberg's opposition to the Project and concern regarding open space in relation to past Project approvals. Please see response to comment A-2. Please refer to Letter P for responses to GMIA concerns regarding the Project.

XX-2 The County appreciates the review and comments from Mr. Martin Greenberg and Ms. Deena Greenberg in their email dated September 21, 2018. The County acknowledges the Greenberg's concerns regarding traffic and smog. Initial Study Section XVI. Transportation and Traffic provides an analysis of the Project's impacts related to traffic. As discussed in this section, impacts would be less than significant with mitigation incorporated. Initial Study Section III. Air Quality also provides an analysis of the Project's impacts related to air quality, such as smog. As discussed in this section, air quality impacts would be less than significant. No changes were made to CEQA documentation as a result of this comment.

XX-3 The County appreciates the review and comments from Mr. Martin Greenberg and Ms. Deena Greenberg in their email dated September 21, 2018. The County



acknowledges the Greenberg's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Steven Jay Gross**

YY-1 The County appreciates the review and comments from Mr. Steve Gross in his email dated September 19, 2018. The County acknowledges Ms. Gross's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.

YY-2 The County appreciates the review and comments from Mr. Steve Gross in his email dated September 19, 2018. The County acknowledges Ms. Gross's concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Tony Gaipa**

ZZ-1 The County appreciates the review and comments from Mr. Tony Gaipa in his email dated September 21, 2018. The County acknowledges Mr. Gaipa's support for the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Sonya Heiserman**

AAA-1 The County appreciates the review and comments from Ms. Sonya Heiserman in her email dated September 25, 2018. The County acknowledges Ms. Green's concerns regarding aesthetics. Initial Study Section I. Aesthetics provides an analysis of the Project's impacts related to visual resources. As discussed in this section, aesthetic impacts would be less than significant. No changes were made to CEQA documentation as a result of this comment.

AAA-2 The County appreciates the review and comments from Ms. Sonya Heiserman in her email dated September 25, 2018. The County acknowledges Ms. Heiserman's opposition to the Project and concern regarding open space easements in relation to past Project approvals. Please see response to comment A-2.

**Response to comments received from Rosalie Green**

BBB-1 The County appreciates the review and comments from Ms. Rosalie Green in her email dated September 24, 2018. The County acknowledges Ms. Green's opposition to the Project and concern regarding open space. Please see response to comment A-2. Section IV. Biological Resources,

also analyzes the Project's direct and indirect biological resource impacts and identifies mitigation for the Project through habitat-based mitigation and biological open space easements. Standard avoidance measures, such as temporary fencing, biological monitoring, and avoiding grading during the avian breeding season, will also reduce the project's impacts to below a level of significance.

**Response to comments received from JD Mitchell**

CCC-1      The County appreciates the review and comments from Mr. JD Mitchell in his email dated September 21, 2018. The County acknowledges Mr. Mitchell's support for the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Anne-Marie and Jim Roach**

DDD-1      The County appreciates the review and comments from Ms. Ann-Marie Roach and Mr. Jim Roach in their email dated September 21, 2018. The County acknowledges Ms. Roach's concern regarding open space. Please see response to comment A-2 and BBB-1.

**Response to comments received from Harris Steinberg**

EEE-1      The County appreciates the review and comments from Mr. Harris Steinberg in his email dated September 6, 2018. The County acknowledges Mr. Steinberg's opposition to the Project. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Mark Schuppert**

FFF-1      The County appreciates the review and comments from Mr. Mark Schuppert in his email dated September 6, 2018. The County acknowledges Mr. Schuppert's concern regarding the Rancho San Diego Specific Plan and references to the Project site. Please see response to comment A-11. No changes were made to CEQA documentation as a result of this comment.

**Response to comments received from Jacob Armstrong of the California Department of Transportation (Caltrans)**

GGG-1      The County appreciates the review and comments from Jacob Armstrong of the California Department of Transportation in his letter dated September 26, 2018. The sidewalk is proposed to be five feet wide, as noted in the Caltrans letter. The sidewalk has been widened to six feet on the plans to

be consistent with the Caltrans requirement. No changes were made to CEQA documentation as a result of this comment.

GGG-2      The County appreciates the review and comments from Jacob Armstrong of the California Department of Transportation in his letter dated September 26, 2018. The three turn lanes are the existing condition, as indicated in the Traffic Impact Study. The proposed retirement center project does not propose changes. No changes were made to CEQA documentation as a result of this comment.

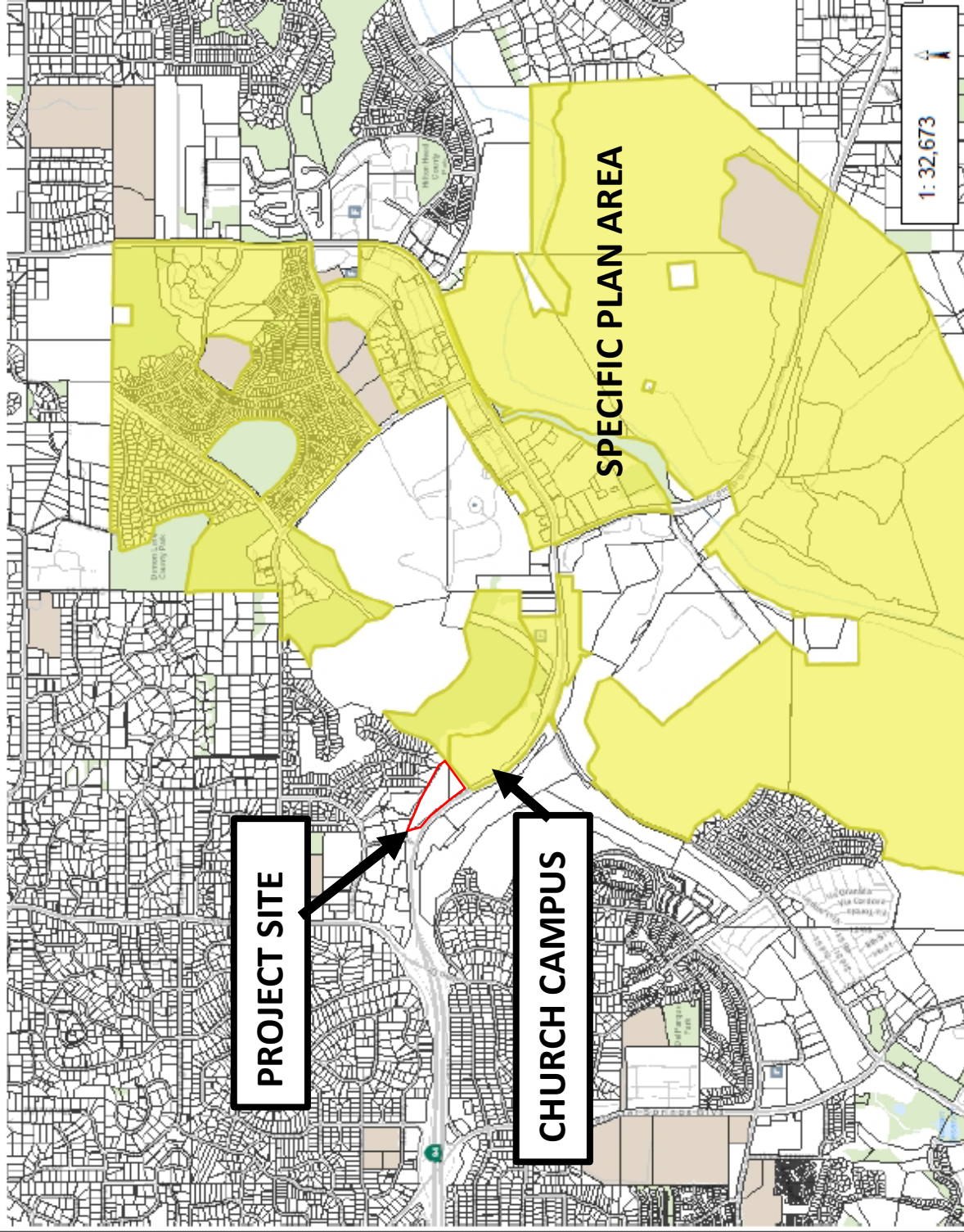
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Response to Comments  
PDS2015-MUP-15-029  
PDS2015-ER-15-08007

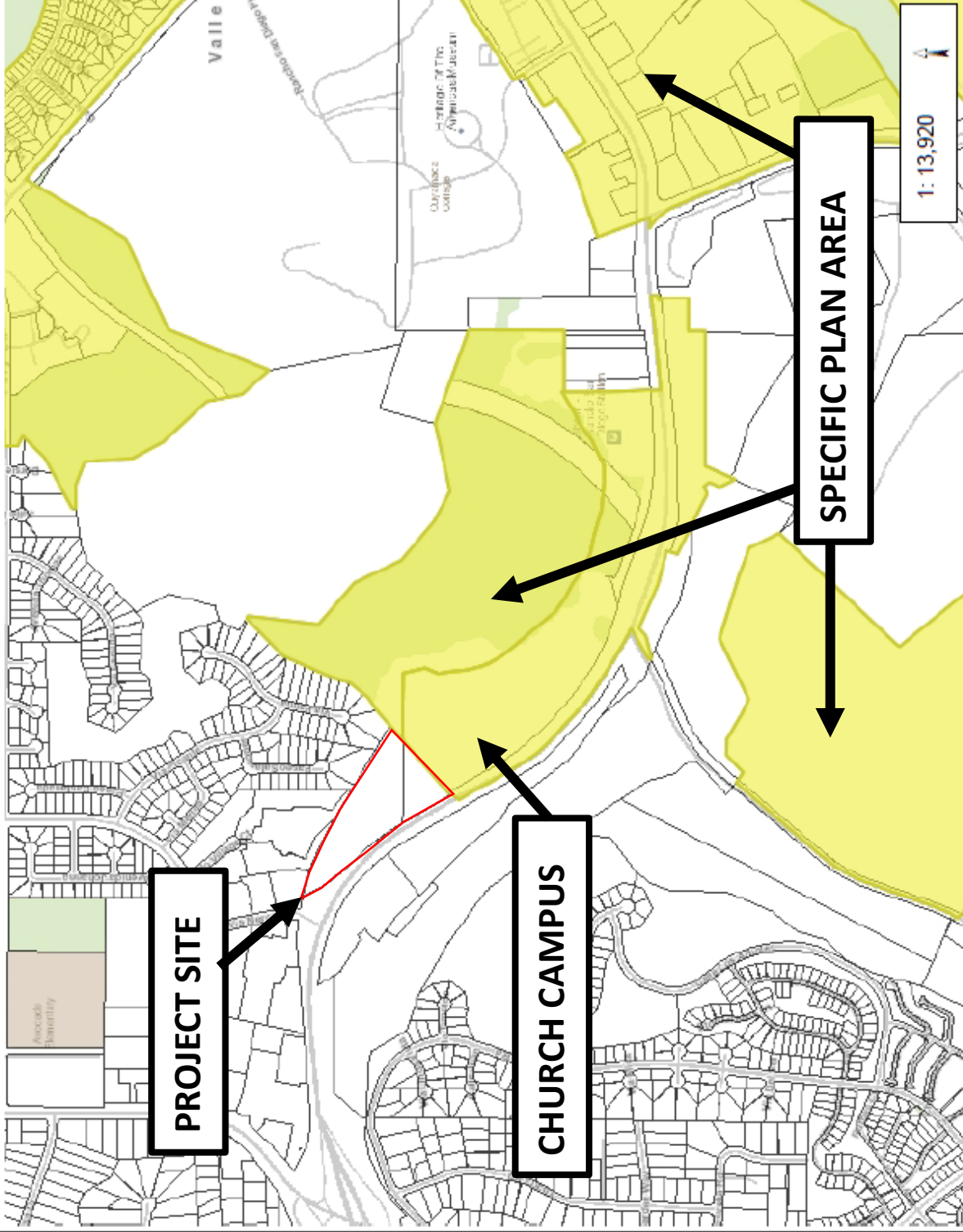
## **APPENDIX A**

### **SITE LOCATION OUTSIDE OF RANCHO SAN DIEGO SPECIFIC PLAN BOUNDARIES**

# RANCHO SAN DIEGO SPECIFIC PLAN (DETAIL)



# RANCHO SAN DIEGO SPECIFIC PLAN (DETAIL)



Legend

☐ Parcels

CURRENT  
GIS DATA

Notes

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.  
 THIS MAP IS NOT TO BE USED FOR NAVIGATION

3810-79-005  
excerpt: PAS 2011-~~77~~  
Decision

**RANCHO SAN DIEGO**

**SPECIFIC PLAN**

(A Large-Scale Project)

Proposed by:

**RANCHO SAN DIEGO**

2700 Jamacha Road  
El Cajon, CA 92020  
(714) 462-9110

Prepared by:

**PRC TOUPS**

2223 Avenida de la Playa, Suite 267  
La Jolla, CA 92037

Presented to:

**COUNTY OF SAN DIEGO**  
**DEPARTMENT OF PLANNING AND LAND USE**  
9150 Chesapeake Road  
San Diego, CA 92123

**prc**

**PRC Toups Corporation**

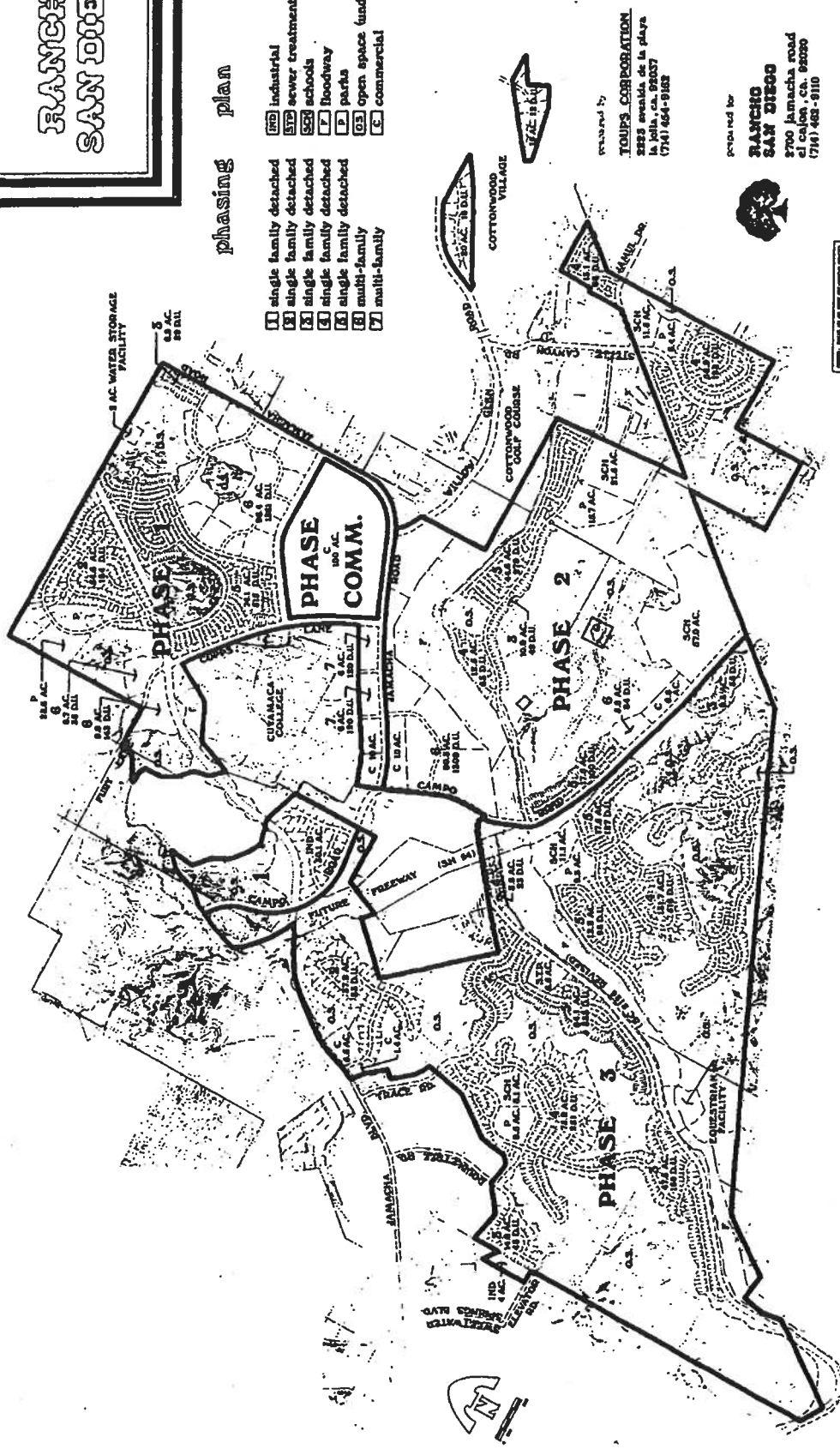
2223 Avenida de la Playa La Jolla, California 92037  
Telephone (714) 454-9162

A Planning Research Company

# RANCHO SAN DIEGO

## phasing plan

- 1 single family detached
- 2 single family detached
- 3 single family detached
- 4 single family detached
- 5 single family detached
- 6 multi-family
- 7 multi-family
- 8 industrial
- 9 sewer treatment plant
- 10 schools
- 11 floodway
- 12 parks
- 13 open space (undisturbed)
- 14 commercial



DESIGNED BY  
**TOWERS CORPORATION**  
 2225 Avenida de la Playa  
 San Diego, CA 92107  
 (714) 464-9182

PREPARED FOR  
**RANCHO SAN DIEGO**  
 2700 Jamacha Road  
 El Cajon, CA 92020  
 (714) 482-9110

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EXCERPT: PSD-3810-79-005  
Environmental Doc

LOG #79-19-34  
EIR certified 9/7/79

DRAFT  
ENVIRONMENTAL IMPACT REPORT

RANCHO SAN DIEGO  
SPECIFIC PLAN

SAN DIEGO COUNTY, CALIFORNIA

LSP 79-05  
TM 4032

Lead Agency

Environmental Analysis Division  
County of San Diego  
9150 Chesapeake Road  
San Diego, CA 92123

environmental studies group

Prepared For:

Rancho San Diego  
2700 Jamacha Road  
El Cajon, CA 92020

**prc**

**PRC Toups Corporation**

2223 Avenida de la Playa La Jolla, California 92037  
Telephone (714) 454-9162

A Planning Research Company

**specific plan**

- 1 single family detached  
 2 single family detached  
 3 single family detached  
 4 single family detached  
 5 single family detached  
 multi-family  
 multi-family  
 industrial  
 sewer treatment plant  
 schools  
 floodway  
 parks  
 open space (undisturbed)  
 commercial

Prepared by

**TOUPS CORPORATION**  
2223 avenida de la playa  
La Jolla, CA 92037  
1714 454-9182

for pastured

**BLANCHETT**  
**SAN DIEGO**  
2700 Jamacha r  
del Cajon, ca. 920  
714 483-9110



68  
23  
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20

PD 97011-3813-87-001

**RANCHO SAN DIEGO  
SPECIFIC PLAN  
SPA87-001**

**Prepared for:**

**Home Capital Development Group  
707 Broadway, Suite 1017  
San Diego, CA 92101**

**Prepared by:**

**Brian F. Mooney Associates  
9903-B Businesspark Avenue  
San Diego, CA 92131**

**Estrada Land Planning  
533 "F" Street, Suite 205  
San Diego, CA 92101**

**Approved By The Board of Supervisors  
March 16, 1988**



# RANCHO SAN DIEGO

A Home Capital Community

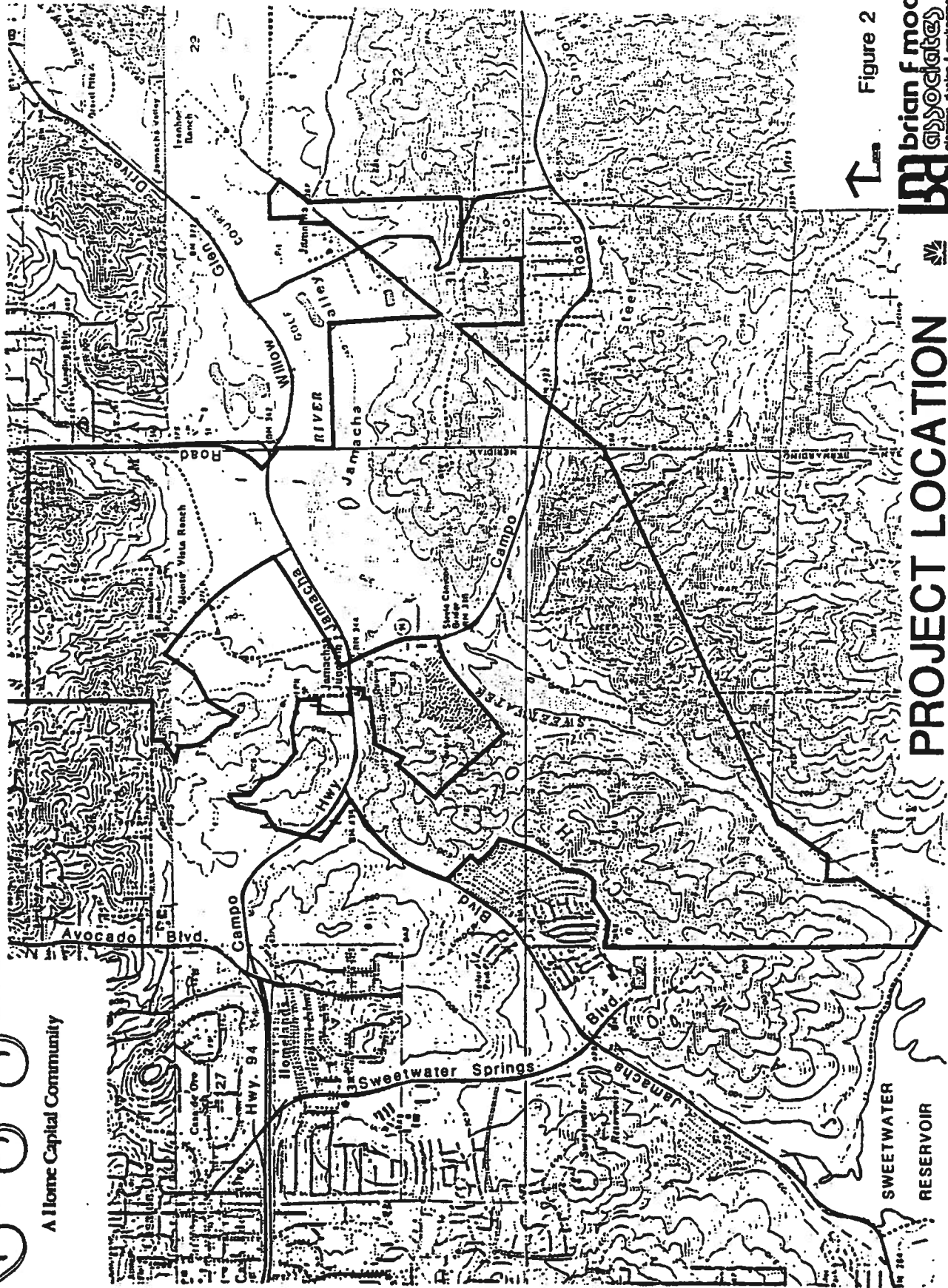


Figure 2

## PROJECT LOCATION

**brian f mooney**  
**associates**  
 planning, design & environmental studies  
 11001 LINDSEY AVE  
 SAN DIEGO, CA 92121  
 619-594-1100

certified  
3/16/1988

FEIR-RanchoSD-SPA87-001

**FINAL  
ENVIRONMENTAL IMPACT REPORT  
FOR  
RANCHO SAN DIEGO  
SPECIFIC PLAN AMENDMENT  
(SPA87-001, R87-006, Log #87-19-6)**

**brian f mooney**  
**associates**  
planning, design & environmental studies

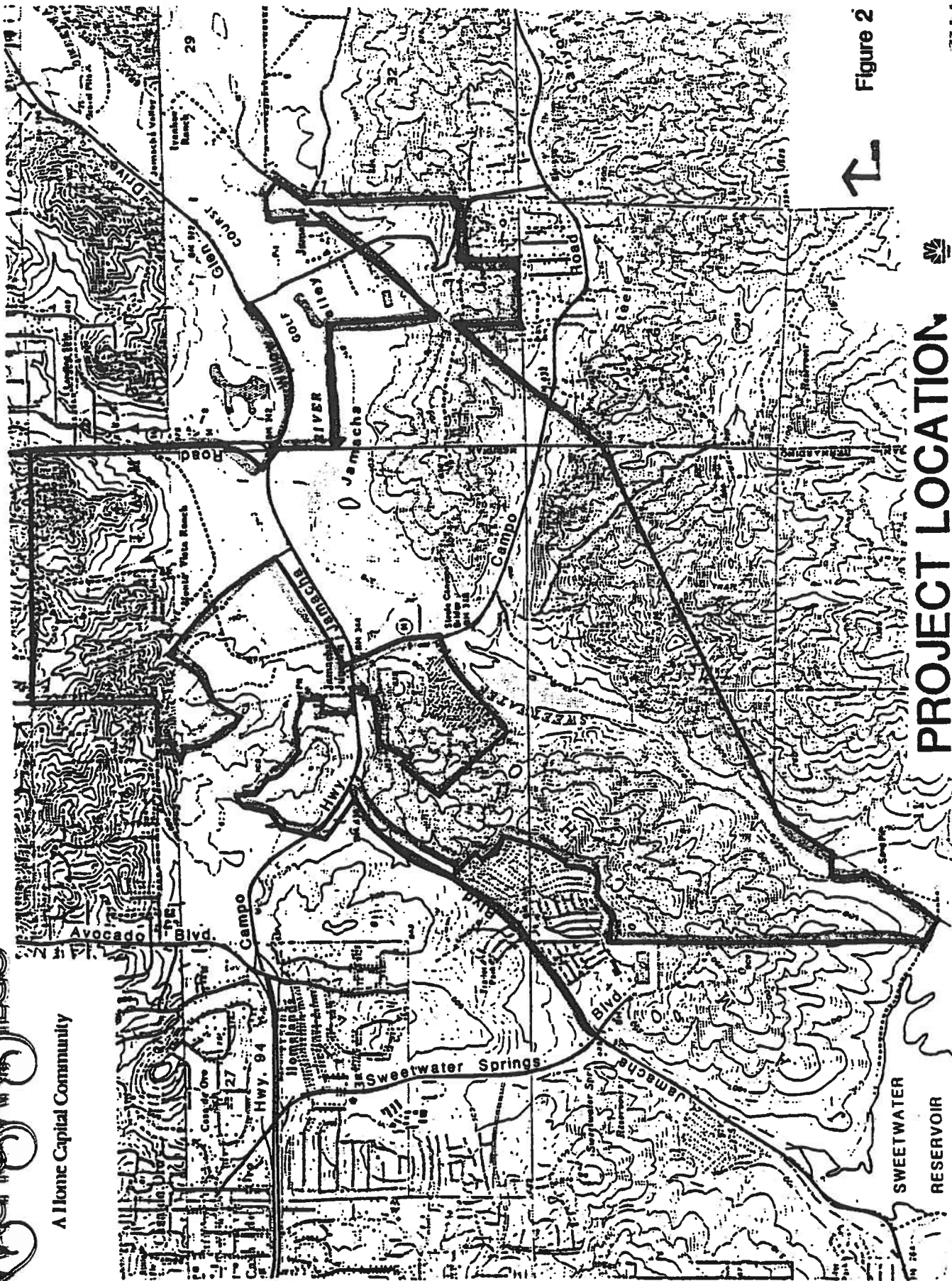


Figure 2

**PROJECT LOCATION**

**RANCHO SAN DIEGO  
SPECIFIC PLAN  
SPA 13-001**

Prepared for:  
North Island Credit Union  
P.O. Box 85833  
San Diego, CA 92186

Rancho San Diego Specific Plan  
Approved and Amended by  
The Board of Supervisors  
(December 4, 2013 SPA 13-001)  
(March 6, 1996 [1] SPA 95-002)  
(July 17, 1996 SPA 95-002)  
(August 21, 1996 SPA 94-001)



A Home Capital Community

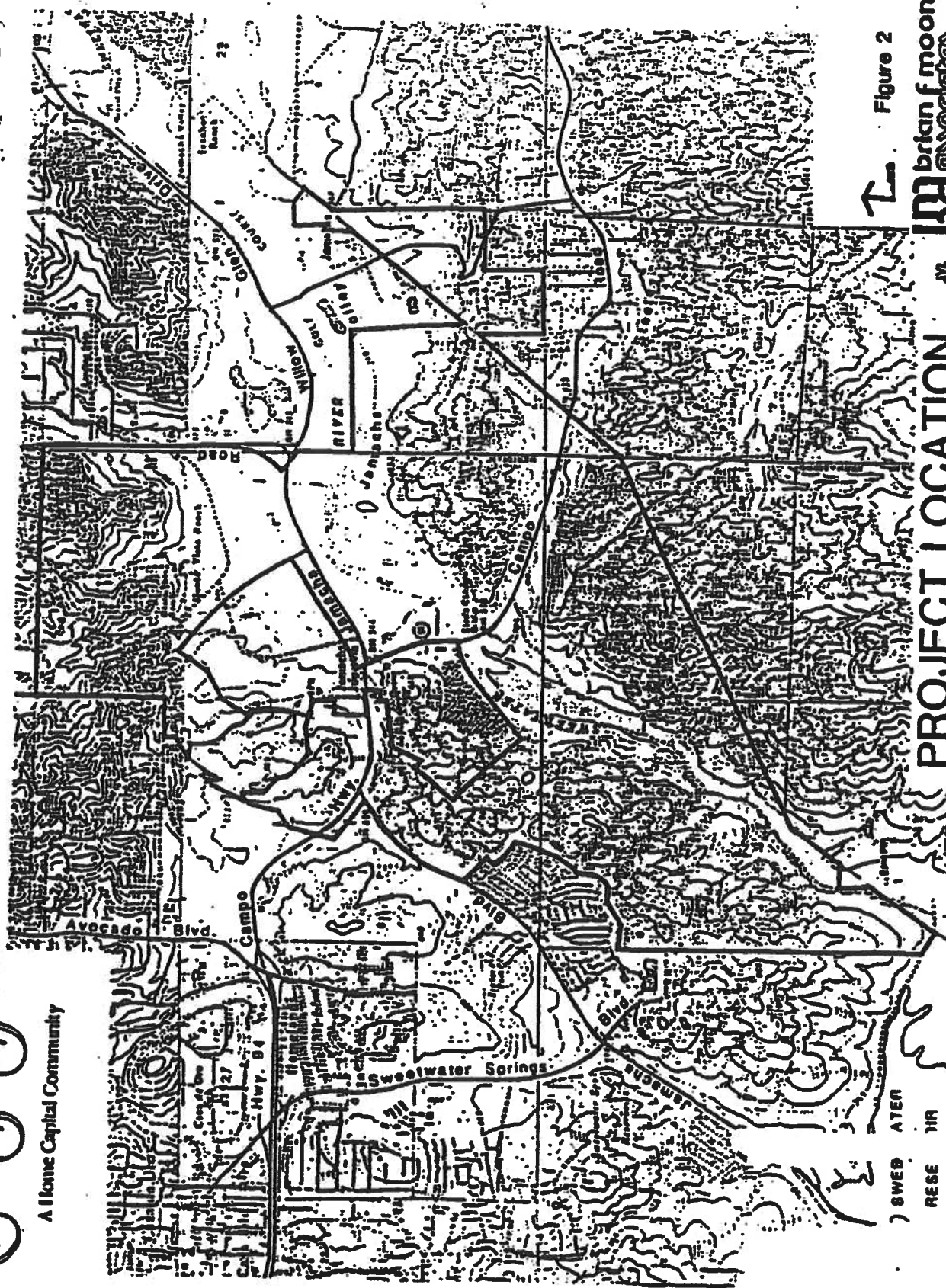


Figure 2

# PROJECT LOCATION

brian f mooney  
PROJECT

PROJECT LOCATION  
PROJECT LOCATION  
PROJECT LOCATION