

I-183 James and Susan Hennenhoefer

- I-183-1** The comment thanks the County for the opportunity to voice concerns regarding the Draft EIR. The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.
- I-183-2** The comment states that the County approved the General Plan and spent millions in the process. The comment urges the County to recommend against the Newland Development and to continue to safeguard the rural environment. The Draft EIR directly compares the proposed project land uses to the Existing General Plan Land Uses in Section 4.5, Existing General Plan Alternative. (Draft EIR, p. 4- 16.) Compared with the project, Section 4.5.5 has determined that the Existing General Plan Alternative would actually result in greater significant impacts to Transportation and Traffic, Biological Resources, Cultural Resources, Aesthetics and Mineral Resources compared to the project. (Draft EIR, p. 4-24.) See **Topical Response LU-1**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- I-183-3** The comment states the project has sought special treatment under the draft North County MSCP prior to adoption of the plan by the applicable agencies. The comment does not raise an issue related to the adequacy of any specific section of the Draft EIR or its analyses. The County also does not concur with this comment for the reasons set forth in **Topical Response BIO-1**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- I-183-4** The comment states that the project would add 28,000 new trips per day to the local roads and would bring I-15 traffic to level “F”. The comment restates information contained in the Draft EIR concerning trip generation and does not raise any issue concerning the analysis in the Draft EIR. Specifically, Section 2.13.6 of the Draft EIR projects the anticipated project trips. Section 2.13.9 analyzes the project’s impacts to the transportation network, including impacts to freeway segments. The Draft EIR identified impacts TR-18 (I-15 from Deer Springs Road to Pomerado Road) and TR-41 (I-15 from Old Highway 395 to Pomerado Avenue) as significant and unavoidable direct and cumulative impacts, respectively. To clarify, however, the I-15 segments identified operate at LOS F under existing conditions. (See Table 2.13-3, Existing Freeway Mainline Operations.) Please refer to **Responses to Comments O-1-237 and O-1-253**, as well as **Topical Response TR-1** addressing impacts and mitigation concerning the I-15 mainline.

Comment Letter Responses

The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

I-183-5 The comment states that the project proposes to widen Deer Springs Road to six lanes and build a new I-15 interchange. The comment also states that Newland plans to start building before Caltrans finishes its analysis and approval of a re-design interchange at Deer Springs Road and I-15. As stated on page 2.13-2 in Section 2.13, Transportation and Traffic, the project proposes two options for Deer Springs Road (Option A and Option B), neither of which propose full buildout of a six-lane roadway as identified in the County's General Plan (6.2 Prime Arterial). Option A would require the reclassification of Deer Springs Road in the County's General Plan Mobility Element (County of San Diego 2011a) from a 6.2 Prime Arterial classification (six-lane) to a 4.1A Major Road with Raised Median classification (i.e., a four-lane road) between the San Marcos City Limit (just north of the Twin Oaks Valley Road) and Sarver Lane; to a 2.1B Community Collector with Continuous Turn Lanes classification (i.e., a two-lane road) between Sarver Lane and Mesa Rock Road; and back to a 4.1A Major Road classification between Mesa Rock Road and the I-15 Southbound (SB) Ramps.

Option B would construct the entire length of the road from the I-15 SB Ramps to its intersection with Twin Oaks Valley Road as a four-lane road, with an approximately 7,600-foot-long section of the road between Sarver Lane and Mesa Rock Road as a 4.1B Major Road (four lanes of travel with intermittent center turn lanes), and the balance of the road, including its intersections with Sarver Lane and Mesa Rock Road, as a 4.1A Major Road. Option B would not require the reclassification of Deer Springs Road; the roadway would remain as a 6.2 Prime Arterial (six-lane) in the County's General Plan Mobility Element (County of San Diego 2011a) from I-15 to the San Marcos City Limit.

Regarding the comment that Newland plans to start building before Caltrans finishes its analysis and approval of a re-design interchange at Deer Springs Road and I-15, refer to **Topical Response TR-2**.

I-183-6 The comment states that VWD projects a water supply deficient for the entire area and that they will require a 36% water cut to existing customers. The Twin Oaks Valley Property Owner's Association made the same or similar comment in a newspaper ad, noting that "36% cuts to resident's water supply" would be required so as to serve the proposed project. The VWD responded by posting on its website a "Correction of Misinformation." Please refer to **Topical Response UTL-2**.

Comment Letter Responses

I-183-7 The comment states that the proposal does not provide sufficient emergency access routes in the event of a fire. The comment also states that gridlock occurs on I-15. With respect to emergency evacuation, Appendix N-2 is the Evacuation Plan for Newland Sierra, which was prepared in coordination with the Deer Springs Fire Protection District and County of San Diego, and does not conflict with existing evacuation and pre-plans. From Page 2.8-20 of the Draft EIR, “the intent of the evacuation plan is to guide implementation of an evacuation procedure such that the process of evacuating people from the Site is facilitated in an efficient manner and according to a pre-defined, practiced evacuation protocol.” Appendix N-2 identifies the proposed project’s evacuation road network, including internal roads which connect to three primary ingress/egress roads, and ultimately connect to major evacuation routes, including, Deer Springs Road, Sarver Lane, North Twin Oaks Valley Road, Buena Creek Road and Interstate 15. In addition, the proposed project includes improvements to Deer Springs Road which would increase capacity of the main evacuation route compared to the existing condition. Further, improvements to North Twin Oaks Valley Road and Buena Creek Road would expand capacity of the network to assist evacuation efforts for the surrounding community. Please see **Topical Response HAZ-1** for a more detailed explanation of evacuation.

Relative to the concern that increased traffic from the project during an evacuation would result in gridlock, which has been experienced in previous evacuations within the project vicinity, the proposed project includes improvements to Deer Springs Road which would increase capacity of the main evacuation route compared to the existing condition. Further, improvements to North Twin Oaks Valley Road and Buena Creek Road would expand capacity of the network to assist evacuation efforts for the surrounding community. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-183-8 The comment states that this is yet another development designed to compromise the General Plan. The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

I-183-9 The comment states that the County should not approve the project until the Climate Action Plan (CAP) has been completed. The comment also states that the Golden Door and Sierra Club recently won a trial court decision invalidating the County’s threshold for measuring greenhouse gas impacts. The County refers the commenter to **Topical Response GHG-3** regarding the County’s 2018 CAP. The County adopted its CAP on February 14, 2018.

Comment Letter Responses

Regarding the invalidated GHG threshold, the County acknowledges the comment and notes the proposed project did not use the Efficiency Metric for analyzing the proposed project's impacts. Refer to **Response to Comment O-1-186**. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.