

I-189 Maryrita Hillengas and David Paul

- I-189-1** The County acknowledges the comment as an introduction to comments that follow. The comment expresses the opinions of the comment, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. 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-189-2** The comment states the project would sever wildlife corridors in a sensitive area if developed. The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. Specifically, Section 2.4.10 Habitat Connectivity and Wildlife Corridors, which describes existing conditions on the project site with respect to wildlife corridors, and Section 2.4.12.4 Wildlife Movement and Nursery Site, which analyzes the proposed projects impacts. The Draft EIR further identifies impacts WM-1 (short-term direct impacts to potential foraging and nesting habitat), WM-2 (permanent, direct impacts to the loss of potential foraging and nesting habitat), WM-3 (impact to movement of large mammals from loss of wildlife corridors), WM-4 (impacts to habitat connectivity for larger wildlife species) and WM-5 (impacts to wildlife behavior resulting from noise and/or nighttime lighting in a wildlife corridor) as significant impacts and recommends mitigation measures, including M-BIO-1, M-BIO-2, M-BIO-3, M-BIO-6, M-BIO-7 and M-BIO-8A through M-BIO-8E, which reduce the anticipated impacts to less than significant levels. 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-189-3** The comment states the proposed project has sought a “carve out” of the 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 or analysis of the Draft EIR. The Draft EIR fully analyzes the proposed projects impacts on biological resources, including the project’s compliance with Local Policies, Ordinances and Adopted Plans (See Draft EIR Section 2.4.12.5). Page 2.4-83 states that, “habitat loss from the proposed project would not preclude or prevent the North County Plan from achieving the preliminary conservation objectives from the draft North County Plan Planning Agreement (County of San Diego 2008 and 2014),” and that “the proposed project would not preclude or prevent preparation of the subregional NCCP, and impacts would be less than significant.”
- I-189-4** The comment states the project would impact significant cultural sites. The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. Specifically, Section 2.5.3 identifies ten

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significant impacts to cultural resources, including Impacts CR-2, CR-3 and CR-4 related to the widening of Deer Springs Road, and Impact CR-10 related to the potential for discovery of human remains. Section 2.5.6 identifies mitigation measures which reduce all impacts to cultural resources to less than significant. 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-189-5 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 and does not raise an environmental issue within the meaning of CEQA. The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. Specifically, Section 2.13.6 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 a 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.) 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-189-6 The comment states that the project proposes to widen Deer Springs Road to six lanes and build a new I-15 interchange, drawing thousands of cut-through commuters. 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.

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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, the project applicant is to coordinate with Caltrans to improve the interchange based on the lane configuration ultimately approved by Caltrans. Construction of the interchange improvements will mitigate the project's identified significant impacts at that location. Moreover, the Draft EIR identifies the 370th dwelling unit as the trigger for improving the I-15/Deer Springs Road interchange to avoid a significant impact. (See Draft EIR Appendix R, Table 16-11, Existing + Project Mitigation Phasing Summary – Intersections.) Because implementation of the I-15 interchange improvements is within the jurisdiction and control of Caltrans, and the County cannot assure their implementation, the Draft EIR properly identifies the impact as significant and unavoidable. However, the project applicant to date has been coordinating closely with Caltrans regarding the interchange improvements and, therefore, it is reasonable to conclude as a practical matter that the improvements will be in place prior to the triggering of a significant impact. See **Topical Response TR-2**.

- I-189-7** The comment states that Vallecitos Water District projects a water supply deficit for the next 20 years and that the District's Water Supply Assessment requires a 36% water supply cut to existing customers in order to serve the Newland Sierra development.

Regarding the proposed projects impacts to water supply, the Draft EIR analyzes water supply in Section 2.14.1, Water Supply and Service, Appendix S, Water Supply Assessment. Please to **Topical Responses UTL-1** and **UTL-2**.

- I-189-8** The comment states that the project is in a "Very High Fire Hazard Severity Zone" (VHFHSZ) and that the project does not provide enough emergency access routes in the event of a fire which would cause gridlock during an evacuation. The Draft EIR addresses the project's location in a VHFHSZ in Section 2.8 Hazards and Hazardous Materials. Refer to **Topical Response HAZ-1** and Appendix N-2.

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- I-189-9** The comment states that the County Board of Supervisors spent millions of dollars and 10 years developing a General Plan that protected and downzoned this area, and that a few years ago the Board of Supervisors voted to approve the plan and protect this area from development. The comment does not challenge the adequacy of the Draft EIR, nor does it does not raise an environmental issue within the meaning of CEQA. However, it should be noted the Draft EIR includes the Existing General Plan as an Alternative. Please refer to Draft EIR Section 4.5 for a comparison of the impacts of the proposed project and the Existing General Plan. In addition, the Draft EIR thus acknowledges the project would develop more residential than permitted by the existing General Plan land use designations, but would develop substantially less commercial space and retain more open space than existing General Plan designations. See **Topical Response LU-1**.
- I-189-10** 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.

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.