I-201 Gwen Hulbert

- **I-201-1** 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-201-2 The comment states that changes to PAMA habitat are unmitigable and that preserving a chunk of land east of Ramona doesn't mitigate impacts on the Merriam Mountains area. The County acknowledges that the off-site mitigation area is located approximately 20 miles east of the project Site and with some elevation and topographical differences compared to the project Site. However, the County allows for off-site mitigation areas that provide similar vegetation communities and habitat types. The proposed off-site mitigation area is located entirely within the PAMA and conservation of this site contributes to the overall preserved lands within the PAMA and provides an important block of habitat for that region.

As described in the Newland Sierra Off-Site Mitigation Memorandum (Appendix K to Appendix H of the Draft EIR), the mitigation site is comparable to or better than the habitat that is being impacted on the Newland Sierra site. The mitigation site includes a variety of topographic relief, a comparable suite of vegetation communities, and rock resources. Therefore, it contributes to the vegetation community mitigation requirements described in Table 2.4-27, pgs. 2.4-172 and 2.4-173 of the Draft EIR. Please refer also to **Topical Responses BIO-1 and BIO-2.**

- I-201-3 The comment states that several of the areas designed as open land would be surrounded by roads on all sides as well as nearby development severely impacting the species found in that area. The Draft EIR provides a summary list of the potential long-term indirect effects associated with development that is the analytic basis for the significance determination. The Biological Resources Technical Report (Appendix H of the Draft EIR) provides details regarding these potential long-term indirect effects. In addition, Section 2.4 of the Draft EIR the Draft EIR addresses both direct and indirect impacts to species, habitat connectivity and wildlife corridors, including from project development, road crossings, human access, increased noise, night lighting, etc. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.
- **I-201-4** The comment states that the County did a fine job of developing the General Plan several years ago, taking into consideration many complex factors. The County notes

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the comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. 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 because the comment does not raise an environmental issue.