

I-332 Ana Rosvall

I-332-1 The commenter explains that she is a member of the Twin Oaks Valley Sponsor Group and they have submitted a letter as a group opposing the project and most of her concerns are provided in that letter. The commenter explains that she is also writing as an individual to express her personal opposition to the Project and to ask questions that she felt were not adequately addressed in the EIR. The commenter explains that she loves the rural area and is deeply disturbed by the Project.

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-332-2 The comment explains that the County spent 13 years and 7 million dollars on the General Plan and that the Project does not comply with the General Plan. The comment states that the General Plan should not be amended for the Project and the General Plan is the County's land constitution.

Please refer to **Topical Response LU-1**. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-332-3 The comment states that the mitigation land purchased in Ramona is not the same land as the Project site because it is too far inland and does not contain the same wildlife habitat; therefore it is not appropriate.

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. 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-332-4 The comment states that the Project was bad when it was denied before as the Merriam Mountains project and the changes, now that its proposed as Newland Sierra are negligible.

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The previous project denial has no bearing on the current project or its environmental analysis because: (a) the prior project was considered and rejected more than seven years ago under different factual and legal circumstances, (b) the prior project was subject to different environmental analyses, and (c) the prior project involved different features, plans, and amenities. The Draft EIR for the proposed project has been prepared in compliance with CEQA, and represents a substantial size reduction when compared to the prior project, as it would develop approximately 20% fewer homes, preserve an additional 17 acres of open space onsite plus an additional 218 acres off-site, and generate approximately 7,000 fewer daily trips overall. Nonetheless, 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 requiring any further response under CEQA.

- I-332-5** The comment states that there are too many things that are not known about the Project.

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

- I-332-6** The comment states that it is not known what is planned for the I-15 onramp and offramp and that Caltrans, as of right now, does not have plans to alter it. The comment states that the I-15 is already overcrowded and the Project would bring it to an “F (failing) grade.”

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

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

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

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

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

- I-332-7** The comment states that the Project's plans for onsite biological mitigation is all wrong and the Project would build homes in prime habitat areas, and would chop up the open space area into islands, cutting off connectivity. The comment states that this would be devastating to the species that live there as they would not be able to move as they would be blocked by the homes, freeways, and a four lane road.

Section 2.4-10, Habitat Connectivity and Wildlife Corridors, in the Draft EIR provides detailed discussions of habitat connections and potential movement corridors under existing and post-development conditions on the project Site and in the project vicinity, including across Deer Springs Road and I-15. Sections 6.2.2 and 6.2.3 of the Draft EIR Technical Appendix H, Biological Resources Technical Report, pages 6-4 through 6-10, further detail anticipated project effects to connectivity between blocks of habitat and the creation of non-natural movement corridors.

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To reduce the project's significant impacts to less-than-significant level relative to wildlife movement, the Draft EIR identifies mitigation measures M-BIO-8A through M-BIO-8E, which would provide for habitat management and conservation of open space areas that would allow for wildlife movement and use (Draft EIR, p. 2.4-106 to 2.1-119). See Topical Response Biology-2 (Wildlife Corridors). 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-332-8** The comment states that the comments above have likely been addressed, but that the following comments have likely not been addressed yet.

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-332-9** The commenter explains that they are concerned about the air pollutant emissions, noise, and vibration impacts that would result from on-site rock crushing operations during construction. The comment states that the Draft EIR makes it difficult to determine how much rock crushing would occur, but the air quality section states there will be 5,650 tons of rock crushing per day per crushing facility.

The comment states that the noise section states there will be two rock crushing locations. The commenter asks if there would be two separate locations crushing 5,650 tons of rock per day, how many days this would occur, if this would occur simultaneously. The commenter asks if the Draft EIR analyzes the full extent of rock crushing at both locations occurring simultaneously and suggests that the Draft EIR did not analyze the full extent of the impacts.

The commenter is directed to Section 3.1.3, Rock Crushing Emissions Methodology of the Air Quality Technical Report (Appendix G of the Draft EIR). As explained in Section 3.1.3 of the Air Quality Technical Report:

“While a single primary crusher and screen may be all that is required, use of a secondary crusher and additional screen would expedite this process. To generate a conservative emission estimate, it was assumed that a feed hopper, primary and secondary crushers, two screens, and several conveyors for transfers would be used.”

Additionally, Table 17 of the Air Quality Technical Report (Appendix G of the Draft EIR) provides the maximum daily processing rate of the rock crusher for Phase 1 and 2 of Project construction. As summarized, Phase 1 would last 206 days and would

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involve the maximum processing rate of 7,500 cubic yards of rock per day. Phase 2 would last 113 days and would involve the maximum processing rate of 5,000 cubic yards of rock per day.

- I-332-10** The comment asks how air pollutant emissions, noise, and vibration impacts of rock crushing are analyzed and if they are only analyzed as an “average” throughout the day.

The commenter is directed to Section 3.1.3, Rock Crushing Emissions Methodology of the Air Quality Technical Report (Appendix G of the Draft EIR) and Section 3.3.1, Potential On-Site Temporary Construction Noise Impacts of the Noise Report (Appendix Q of the Draft EIR), which describes the methodology of the crushing analysis. The air quality, noise, and vibration impacts analyses assumed a worst case scenario for rock crushing activities. The maximum throughput per day was analyzed; therefore the maximum criteria air pollutant emissions were calculated. Both the 8 hour average and impulsive noise associated with crushing activities were analyzed in the noise analysis. Additionally, all overlapping construction activities, including those from general construction activities, blasting, and rock crushing were accounted for in the quantification of maximum daily emissions and noise and vibration impacts.

- I-332-11** The comment states that air pollutant emissions, noise, and vibration would occur at each instance of rock crushing, not as a steady average throughout the day. The comment states that to understand the impact on the community, it is important that the community fully understand the impacts at the moment of crushing.

Please refer to **Response to Comment I-344-10**.

- I-332-12** The commenter asks if the combined impact of two rock crushing operations at both locations are analyzed.

Please refer to **Response to Comment I-344-9**.

- I-332-13** The comment states that this is confusing and that once the full extent of rock crushing and its impacts are clearly described in the EIR, it should be recirculated for public review so people can understand how rock crushing would impact the daily lives of the surrounding community.

Please refer to **Response to Comment I-344-9**. No recirculation of the EIR would be required because the impacts associated with rock crushing were described in the Draft EIR.

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