

I-4 Lisa Amantea (2)

- I-4-1** The comment states that the project will cause significant loss to critical biological habitat including, but not limited to, native plant species and wildlife preservation and connectivity. All potential impacts to biological resources including plant and wildlife species have been adequately disclosed and mitigated for in the Draft EIR. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. Please see **Topical Responses BIO-1 and BIO-2**. 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-4-2** The comment asks by what analysis is the conclusion drawn that “due to the dense nature of the chaparral covering most of the project, wildlife movement is generally confined to existing dirt roads,” as stated in the Executive Summary in Section S.0.3. As stated in Section 2.4, Biological Resources, on page 2.4-53, “Although many species are known to use mature chaparral, some chaparral may be very dense and difficult for medium to larger wildlife, such as mule deer, to maneuver through. As such, dirt access roads and trails may serve as a primary route for medium to larger wildlife movement.” Additionally, as stated on page 2.4-78, “much of the area is encompassed by dense chaparral. In such habitat, unmaintained dirt roads on Site may serve as important wildlife corridors for large mammals, including mule deer, coyote, gray fox, and bobcat.” The County acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.
- I-4-3** The comment states that purchasing the dissimilar land in Ramona does not appear to be a valid “swap” for mitigating impacts to California gnatcatcher. The comment also asks how this property is being used to mitigation wildlife connectivity. 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

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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.

Regarding the commenter's question about how the off-site mitigation land in Ramona is mitigating for the loss of wildlife connectivity, as stated on page 2.4-93, "the off-site mitigation area in Ramona would connect segments of the Cleveland National Forest and San Diego County Parks land and provide protection for continued use by a variety of wildlife. The preservation of 211.8 acres of one large off-site parcel situated in a key natural gap in the adjacent agricultural (ranches, poultry farms) landscape amid cattle ranch lands and open space would provide for connectivity between segments of the Cleveland National Forest located approximately 2 miles to the east and west, and San Diego County Parks land located approximately 3 miles to the north and south."

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-4-4 The comment states that the development will use ridge tops and fill in river bottoms, but denies any significant impact to wildlife as they will use the mid-slope to travel. The comment asks if there is evidence that this is the case. The project does not propose to grade ridge lines or fill in river bottoms. Wildlife corridors and potential impacts to species traversing the project site have been fully disclosed in Section 2.4.12.4 Wildlife Movement and Nursery Sites. Please also see **Topical Responses BIO-1 and BIO-2**. 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-4-5 The comment states that the County spent 10 years coming up with the 2011 General Plan and that Newland Sierra seeks to amend that plan by stating that the development poses no significant impacts. The County disagrees with this comment. All potential impacts whether mitigable or not, have been disclosed in the Draft EIR. Please see **Topical Responses LU-1 and LU-2**. 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-4-6 The comment states that the development is situated in PAMA of the NCMSCP. The comment asks if this is in essence building what is already considered mitigated land. As detailed in the Draft EIR, the project has been identified as a proposed hardline area in the draft North County MSCP, which means both the project's development areas and biological open space areas have been incorporated into the overall

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- conservation strategy of the draft plan. (Draft EIR, p. 2.4-82, 2.4-6.) The Draft EIR states that, based on the proposed hardline area as shown for the draft North County MSCP, the proposed biological open space would assemble approximately 1,209 acres of on-site habitat into three cohesive, contiguous blocks and an additional off-site block of habitat totaling 212 acres (providing habitat value for proposed MSCP-covered species), and protect the biological open space from future encroachment through habitat management and land stewardship in perpetuity (see Draft EIR Figure 2.4-4; and Draft EIR, p. 2.4-82.) The project has been designed in accordance with this proposed hardline area. See **Topical Responses BIO-1 and BIO-2**. 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-4-7** The comment states that the County already denied this project twice under different names and that it doesn't seem right that it keeps coming back to take up peoples time and tax dollars over and over. 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 on site 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-4-8** The comment asks how this project does not fit the criteria for leapfrog development. Please see Appendix DD, Land Use Consistency, to the EIR for a project conformance analysis with General Plan Policy LU-1.2 Leapfrog Development. 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-4-9** The comment asks that by allowing a development of this magnitude, essentially ignoring the General Plan and PAMA/NCMSCP, what protection is left against other such developments. The County disagrees that the project ignores the General Plan or North County MSCP. See **Topical Responses LU-1, LU-2, BIO-1, and BIO-2**. 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.

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I-4-10 The County acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.